

Attached are written comments on wildlife proposals for Central/Southwest Region meeting.
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Bullet Points for Proposals for Central/Southwest Region Meeting

Proposal 51 - Expand the DI454 bison hunt area in Unit 11

- We oppose Proposal 51.
- We are concerned that this could increase trespass on Ahtna lands.
- One of the primary reasons for the closure that we instituted was the State of Alaska's lack of consultation with us when opening new lands to hunting.
- We have yet to be consulted concerning this closure and we oppose hunting within rights-of-way through Ahtna lands.

Proposal 53 – Increase the community subsistence caribou hunt allocation in Unit 13

- We support Proposal 53 to increase the number of caribou allotted for the state Community Subsistence Hunt (“CSH”) to 500, accommodating for the additional demand by a larger number of hunters participating in the CSH.
- Managers have repeatedly failed to provide participants in the CSH the opportunity to reach the quota.
- This is a failure to provide a reasonable opportunity for a normally diligent hunter to participate with a reasonable expectation of success, according to 5 AAC 16.05.258(f).
- CSH should be kept open as stated in Board finding number 2015-209-BOG: "Keep the Copper Basin community subsistence hunt open for the entire season or until the Copper Basin community subsistence caribou quota has been met, whichever occurs first." ADF&G has failed to follow this direction from the BOG.
- Regulatory language for the CSH states that "up to 400 animals may be taken." ADF&G managers have provided an allocation of as few as 200 animals in some years.

- ADF&G should be closing sport hunts early, not the CSH. In 2021, the ADF&G closed the draw-hunts only a few days before they closed the CSH.

Proposal 54 – Increase the youth hunting season for caribou in Unit 13

- We oppose Proposal 54.
- Youth can hunt with their parents during regular hunting seasons just as people have done for generations.
- There are already adequate youth hunt opportunities currently available in the region.
- We cannot keep adding non-subsistence hunts while subsistence hunts are being closed prior to the subsistence season end dates and prior to harvest allocations being met.

Proposal 59 - Increase the community subsistence any bull moose hunt allocation in Unit 13

- We support Proposal 59, increasing the number of moose allotted for the state CSH to 150 to accommodate for the additional demand by a larger number of hunters participating in the CSH.
- Today, a majority of the moose harvests in this hunt are by urban residents. Increasing the quota would reflect the larger population base that the hunt is now serving.

Proposal 62 – Establish an antlerless moose season in Unit 13E

- Ahtna opposes Proposal 62. The bull-cow ratio currently meets management objectives, and the harvest objective is below management objectives.
- Currently, it appears the moose population is estimated at approximately 11 animals above management objectives.
- Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.
- Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur.
- From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population.
- Cows harvested may also have calves with them, the killing of which would orphan the calves.

Proposal 63 - Eliminate the restrictions of one harvest report per household and one bag limit per household in the community subsistence hunt for Unit 13

- We support Proposal 63, as it will help provide for the subsistence priority established in Alaska's statutes.
- The current regulations effectively preclude multiple members of the same household from hunting simultaneously in different places, because only one permit is issued for the entire household.
- Caribou are only present at certain places and at certain times. Allowing only one household member to hunt at a time severely limits community harvest opportunity.
- One caribou is not enough for many households, especially considering the well-documented patterns of sharing and redistribution that typically accompany subsistence uses of fish and wildlife.
- This proposal would not increase the allocation or quota for the CSH, and thus would place no extra conservation burden on the resource.

Proposal 64 - Eliminate the salvage requirement for hide of moose for Alaska residents aged 60 years and older

AND

Proposal 65 – Eliminate the moose hide salvage requirement for hunters aged 62 years and older

- We support Proposals 64 and 65 with a modification requiring that the entire hunting party be over the age 62 for the hide salvage requirement to be optional.
- We also suggest clarifying that these proposals should apply only to hunters who are actually participating in the hunt, regardless of who holds the tags for them. This would give those hunters that are older, and who do not have younger hunters in their parties or do not have access to ATVs, the opportunity to leave hides in the field.
- This would eliminate a potential barrier that is likely to disproportionately discourage elders from participating in this hunt.
- Some elders hunt alone, or in groups with other elders. It is important that subsistence regulations reflect this pattern of hunting.

Proposal 66 – Clarify the Unit 13 Tier I subsistence caribou permit condition that members in a household may not hunt caribou or moose in any other state hunts in other locations.

AND

Proposal 212 - Clarify the Unit 13 Tier I subsistence caribou permit condition that members of a household may not hunt caribou or moose in any other state hunts in other locations

- Ahtna supports Proposals 66 and 212.
- The public should be able to have a clear understanding of the conditions associated with the CSH.
- Federally qualified hunters are still limited to one moose per person, whether they take it under state or federal regulations.

Proposal 69 – Increase the bag limit for brown bear in Unit 13

- Ahtna opposes this proposal due to potential impacts on an ongoing research project.
- Ahtna is currently partnering with AITRC and the ADF&G on a population density study to fill significant data gaps on brown bears in Unit 13.
- This collaborative study will produce a population abundance estimate by the next regulatory cycle to better inform the Board in addressing proposals.
- After joint research is completed, we will reevaluate whether an increase would be appropriate or not.

Proposal 74 – Limit motorized access during the community subsistence moose hunt in Unit 13

- Ahtna opposes Proposal 74.
- A majority of locals depend on motorized transportation for access to the CSH.
- Restricting motorized access will have the effect of restricting subsistence opportunity.

Proposal 209 – Modify the Copper River bison harvest opportunity in Units 11 and 13D

- Ahtna strongly opposes Proposal 209, which would expand the bison hunt in units 11 and 13D.
- We cannot find any studies that have been conducted to address the issue of the carrying capacity of the Tonsina bison herd, or that otherwise would support an increase in harvest.
- There is concern about increased trespass on native corporation lands that adjoin the proposed area.

- Ahtna and Chitina Native Corporation were never consulted about this proposal.
- The bison hunt is a drawing permit hunt and is not customary or traditional.

Proposals 210 – Eliminate the community subsistence harvest moose hunts in Unit 13

- Ahtna opposes this proposal to eliminate the CSH.
- The CSH provides an opportunity to hunt for moose and caribou that is consistent with the customary and traditional use pattern identified by the BOG in 2006 and 2011.
- The CSH provides an important opportunity for Alaskans to meet their subsistence needs.
- Elimination of the CSH system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.
- If the CSH were eliminated, the only other viable option would be to return to Tier II status for all of Unit 13.
- Rather than eliminating the CSH, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of “community” (as defined in 5 AAC 92.072(i)(2)).
- Subsistence needs for customary and traditional users of the resource are not being met.

Proposal 211 – Repeal the Copper Basin area community subsistence harvest hunt area for moose and caribou

AND

Proposal 244 – Eliminate all community subsistence harvest hunts

- Ahtna opposes Proposals 211 & 244.
- Proposal 211 submitted by the Alaska Outdoor Council contains misinformation.
- State and federal community harvest systems recognize in regulations the customary and traditional patterns of harvest and uses.
- ADF&G research demonstrates that in rural Alaskan communities, on average 30% of a community’s households often provide 70% of the wild food harvests for an entire community.
- The proponents of this Proposal state that a community hunt for moose and caribou in the Copper Basin were found to be unconstitutional.
- This is not true. In 2018, the Alaska Supreme Court ruled: “We upheld the bifurcated hunt system on the basis that the community harvest permit

system applied equally to all Alaska citizens and thus did not implicate equal protection or the equal access clauses...”

- This ruling is stated in *Manning v. State Dep’t of Fish & Game*, 420 P.3d 1270, 1279 (Alaska 2018) (citing *Alaska Fish & Wildlife Conservation Fund v. State*, 347 P.3d 97, 102-03 (Alaska 2015)).
- The statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of moose and caribou in the Copper Basin.
- The state may not rely on federal subsistence hunting opportunities that are limited to federally qualified rural residents to provide for subsistence uses.
- Ahtna Intertribal Resource Commission (AITRC) manages a community’s permits for moose and caribou hunts on federal lands in Units 11, 12, and 13.
- The community harvest system that AITRC administers does not allow the Alaska Board of Game to forgo its statutory authority to provide for subsistence uses
- Alaska Statute 16.05.330(c) is clear: “The Board of Fisheries and the Board of Game may adopt regulations providing for the issuance and expiration of subsistence permits for areas, villages, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game.
- Unit 13 would need to go back to a Tier II status for moose and caribou in Unit 13 if the CSH hunt were eliminated

Proposal 213 - Remove the requirement for Tier I caribou hunters to hunt moose in Unit 13

- Ahtna supports Proposal 213.
- Moose hunters will have the option of hunting outside of Unit 13.
- Large numbers of Copper Basin residents currently must compete with hunters from throughout Alaska for a small number of moose.
- Tier I may have to shut down, however, CSH Unit 13 caribou should not be closed by Emergency Order.

Proposal 214 – Eliminate all moose drawing permit hunts in Unit 13

- We support Proposal 214 with modification, based on a review of the data, to only eliminate the DM335-DM339 nonresident draw hunts.
- Alaska State law specifies that subsistence uses have priority over other uses of fish and wildlife.

- Nonresident drawing hunt opportunities should not be allowed to continue while Alaska residents' needs are not being met.
- This modification will still allow for residents to apply for draw permits.

Proposal 216 – Establish an antlerless season in Unit 13C

- Ahtna opposes Proposal 216. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio.
- According to the ADF&G Area Biologist, the cow-calf ratio is low (12:100 rather than the objective of 30:100).
- This antlerless hunt drawing permit would only provide for non-subsistence uses.
- Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any bull allocation to the CSH.
- This would help to ensure that subsistence needs are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

Proposal 217 – Eliminate all caribou drawing permit hunts in Unit 13

- Ahtna supports Proposal 217.
- In 2020, ADF&G closed the Community Subsistence Hunt, failing to provide reasonable opportunity to meet subsistence needs. This is despite the fact that the BOG stated in its 2015-209-BOG finding to keep the Copper Basin community subsistence caribou hunt open for the entire season or until the community subsistence caribou quota has been met, whichever occurs first.
- Eliminating non-subsistence opportunities would be a positive step toward meeting these goals.

Proposal 218 – Increase bag limit for brown bear in Unit 13

- Ahtna is strongly opposed to Proposal 218. No data have been presented to signify that the population can withstand an increase in the bag limit to two brown bears per year.
- The State of Alaska's aerial surveys will be done in 2022.
- ADF&G, AITRC and Ahtna are currently working on a study on bear density that will be completed in 2023.

Proposal 219 – Modify the Unit 13 predation control program

- Ahtna supports Proposal 219, which would add intensive management to Unit 13D. This would be an important tool for managers seeking to ensure healthy ungulate populations in the area.
- Currently there are wolf refugia in both Wrangell St. Elias and Denali National Parks. As a result, there are plenty of places in the broader landscape for wolf populations to remain strong.
- There are also areas within 13D that provide refugia as it is difficult to access via plane.

Proposal 220 – Close moose and wolf hunting within Unit 13A

- Ahtna strongly opposes Proposal 220. There are triggers for when intensive management happens.
- Currently, population, harvest, and bull-cow-ratio are all within management objectives.
- This would close the CSH and take away subsistence opportunity.
- This proposal would simply shift hunting to other areas, causing hunting pressure to increase in those areas.