



February 10, 2014

Alaska Department of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK. 99811-5526

To the Directors of the Alaska Board of Game:

Ahtna Tene Nene' Customary and Traditional Use Committee is hereby submitting additional comments on Proposal 85-Hunting seasons and bag limits in Unit 12 for the Nelchina caribou.

Although, Proposal 85 proposes a winter hunt, if Nelchina Caribou Herd is sustainable to allow a winter hunt, we are still opposed to opening a winter hunt in Unit 12 for the Nelchina Caribou Herd.

Opening a Unit 12 Nelchina Caribou Hunt from October 21-March 31 will increase additional harvest on the Nelchina Caribou Herd. Within the past few years, Unit 13 Nelchina Caribou hunting season has been closed by Emergency Order, due to over harvest. Opening a winter hunt will bring an influx of hunters in Unit 12 to harvest a caribou. A Nelchina Caribou winter season hunt in Unit 12 will eventually take its toll on the Nelchina caribou herd.

Just one harsh winter and a late season Nelchina Caribou migration, such as this past spring 2013, will continue to reduce the survival rate of calves of the Nelchina Caribou Herd. One winter of high levels of snow depth will also impact this caribou herd. Snow depth this past winter has been high during the month of November 2013.

Intermingling of Mentasta Caribou Herd and Nelchina Caribou Herd occurs. Opening a winter hunt will cause incidental harvest of Mentasta Caribou Herd. The Mentasta Caribou herd is in a severe population decline, it is in a downward spiral, mainly due to lack of predator control in Game Management Unit 11 and 12. Mentasta Caribou Herd

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P.O. Box 649 – Glennallen, Alaska 99588  
Phone: (907) 822-3476 – Fax: (907) 822-3495

will be further impacted, hunters will kill Mentasta Caribou herd while attempting to harvest a Nelchina Caribou Herd.

We hope that the Board will take caution in deliberating this proposal and will oppose a winter hunt in Unit 12 for the Nelchina Caribou Herd.

Sincerely,

*Roy S. Ewan*  
for  
*Roy S. Ewan*

Roy S. Ewan  
Chairperson