



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Fish and Game**

DIVISION OF WILDLIFE CONSERVATION
Headquarters

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October 9, 2013

RC 3

Mr. Ted Spraker, Chair
Alaska Board of Game
P.O.Box 115526
Juneau, Alaska 99801

Mr. Spraker:

The AHTNA Customary and Traditional Use Committee has submitted an Agenda Change Request (ACR) to the Alaska Board of Game requesting to change 5 AAC 92.072, Community Subsistence Harvest Hunt Area and Permit Conditions. Under the Board's ACR policy, the Board will accept an ACR only:

- A) for a conservation purpose or reason;
- B) to correct an error in a regulation; or
- C) to correct an effect on a hunt that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling. [5 AAC 92.005 (a) (2-3)].

With respect to these criteria, the Department does not believe there are any conservation concerns that warrant the Board's consideration of this issue out of cycle. The Department can use its Emergency Order authority to address any conservation concerns that may arise. As stated by the proposer, the Department agrees that the request does not address an error in regulation. Finally, it appears there were no effects that were unforeseen when the regulation was adopted; the board was presented with information concerning increased participation in the CSH when it last considered the issue in cycle. This is a determination for the board to make and due to the allocation nature of this ACR, the Department has no recommendation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Doug".

Doug Vincent-Lang, Director
Division of Wildlife Conservation