

**ACR #6** – Designate the Macomb Plateau Controlled Use Area as a Refuge or Critical Habitat Area.

**SUBMITTED BY:** Friends of the Macomb Plateau

**CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.**

Alaska Administrative Code Number 5 AAC NEW

**WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.**

We are a statewide group of hunters and hikers who are alarmed by the unexpectantly rapid acceleration of the effects of climate change upon the wildlife habitat of Alaska.

In Unit 20D the Macomb caribou herd calve and rut on the relatively small, elevated Macomb Plateau. In winter the caribou generally depart the tree barren Plateau for the boreal forest where they mainly feed on lichen.

The past two years have seen heavy deep snows in the Interior. The rain-on-snow event of December 2021 and the late Spring of 2023 have adversely impacted the harvestable populations of the Macomb herd. These adverse weather events are expected to become more frequent in the future. At this time (winter 2023), harvest numbers are at an all-time low and the last population estimate was 550 caribou, well below what the population is managed for.

We are requesting the Board of Game elevate the management status of the Macomb Plateau from Controlled Use Area to refuge or to work with the legislature for a critical habitat designation in order to restrict the use of motorized vehicles during those months when there is insufficient snow cover to mitigate the damage to habitat and trails. We feel this is a reasonable request which would lessen the stress on the caribou's calving and rutting grounds and thus enable them a refuge so the herd can continue to mate and give birth and remain as a critical component to this unique ecosystem and a reliable resource for hunters in the future.

We refer to the 1990 Department of Fish and Game report to the Board of Game titled "Off-Road Vehicles and Hunting in Alaska" for a balanced presentation of the issues regarding ORV use and habitat damage.

**WHAT SOLUTION DO YOU PREFER?**

We would prefer the Board of Game designate the management of the Macomb Plateau be changed from Controlled Use Area to refuge or work with the legislature for a critical habitat designation.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

- A. **To correct an error in regulation.**
- B. **To correct an effect of a regulation that was unforeseen when a regulation was adopted:**

**C. Does the request identify a biological concern for the population or a threat to meeting objectives for the population?**

Our request addresses the long-term threat to meeting objectives for the caribou population of the Macomb Plateau.

**D. Does the request identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f)?**

Our request identifies the long-term threats of climate change as an unexpected effect that will reduce all types of end users from having a reasonable opportunity to enjoy game resources.

**E. Does the request identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future?**

It cannot be determined exactly how the delay in acting on our request would negatively affect the resource in the short term.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?**

Our request is admittedly focused on long term concerns, so the problem does not require action prior to the regular cycle in order to be a valid solution.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

We are not advocating either an increase or decrease in the allocation of any game.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.**

N/A

**STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.**

We are a group of hunters and hikers who regularly frequent the Plateau. Some of our group members are locals and landowners living very close to the Plateau. Some of our members access the Plateau in winter with snowmachines.

**STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.**

We do not believe this proposal has been considered before.