



November 9, 2018

An Agenda Change Request (ACR 6) has been submitted to the Alaska Board of Game requesting to change 5 AAC 92.085 Unlawful methods of taking big game, for hunting moose. The proponent is asking the board to establish a minimum caliber for hunting moose in Unit 18.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C. The department does not believe that there is a biological concern that is caused by existing regulations.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is unaware of any unexpected resource situations that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action.

There is a positive customary and traditional use finding for moose in Unit 18, and an amount reasonably necessary for subsistence of 200–400 moose.

The current regulations state that big game can be harvested by any caliber firearm as long as it is a center-firing cartridge. The board has established standards for some weapons, and the department educates hunters on the pros and cons of legal weapons and calibers. The decision as to which legal caliber is used to harvest game is left to the individual hunter and their capabilities. If this proposal were adopted, moose would have stricter weapons requirements than other big game species. Creating an additional level of weapons restrictions for individual big game species adds complexity to the regulations and may cause additional confusion for the public. A similar proposal was submitted during the 2016 statewide board meeting, imposing a minimum caliber requirement of .243 for hunting moose. The department commented that if a minimum caliber were adopted by the board, that the adoption should be for all big game species and not just moose. The proposal did not pass.

The next regularly scheduled board meeting for statewide regulations is during winter/spring of 2020/2021. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2019 meeting in Anchorage to allow for more public input.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Dale', with a horizontal line underneath.

Bruce Dale
Director
Division of Wildlife Conservation