

## **Department of Fish and Game**

DIVISION OF WILDLIFE CONSERVATION Headquarters

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November 14, 2022

An Agenda Change Request (ACR 11) has been submitted by the Alaska Department of Fish and Game to the Alaska Board of Game requesting to change 5 AAC 85.025(a)(8) Hunting seasons and bag limit for caribou. The proponent is asking the board to establish a Tier II hunt for Nelchina caribou to address a population currently under objective.

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. This ACR is in response to the lack of a needed regulation that was unforeseen.
- D. The department is aware of 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). The Nelchina Caribou herd has been identified as important for customary and traditional uses and is currently under population objective. It is possible that the harvestable surplus in the future may fall below the low end of the ANS range, which means harvestable surplus may not be enough to provide a reasonable opportunity for all residents to participate in hunts that provide caribou for subsistence uses (Tier I registration and community). The creation of a Tier II would further restrict the taking of game to assure that the population is maintained on a sustained yield basis and assure the continuation of subsistence uses.

The next regularly scheduled board meeting for Unit 13 regulations is during winter/spring of 2024/2025 and the next regularly scheduled board meeting is January 2023. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2023 Southcentral meeting to allow for more public input.

Sincerely,

Ryan Scott

Ryan Scott Assistant Director Division of Wildlife Conservation