



November 13, 2018

An Agenda Change Request (ACR 7) has been submitted by the Mid-Lower Yukon Fish and Game Advisory Committee to the Alaska Board of Game requesting to change 5 AAC 92.200 Purchase and sale of game. The proponent is asking the board to prohibit the sale of moose antlers in Unit 18 except for naturally shed antlers and antlers that have been made into an article of handicraft.

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. However, the advisory committee has cited changing social conditions which have resulted in selection of larger moose for harvest and harassment of moose in early winter to cause antler shedding for sale.
- C. The department does not believe that there is a biological concern that is caused by existing regulations. Harassing wildlife is already prohibited.
- 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). 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.
- 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.

Current regulations allow the sale of naturally shed antlers or antlers that have been separated from the skull plate.

A proposal was passed in 1990 to prohibit the sale of unmodified caribou antlers in Unit 23 and later modified to allow the sale of naturally shed antlers and handicrafts made from caribou antlers. In 2014 the board failed to support Proposal 28 during the Arctic/Western Region meeting, which would have removed the restrictions on selling caribou antlers in Unit 23 once they had been removed from the skull.

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 stylized flourish at the end.

Bruce Dale
Director
Division of Wildlife Conservation