THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Fish and Game**

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An Agenda Change Request (ACR 4) has been submitted to the Alaska Board of Game (board) requesting to change 5 AAC 92.111(c). Intensive Management Plans I, the Mulchatna Caribou Herd Predation Management Area. The proponent is asking the board to add wolves back into the Intensive Management (IM) plan. This would mean that wolves can be removed if and when appropriate as part of the active IM program to restore the abundance of the Mulchatna Caribou Herd (MCH).

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 MCH is below population objectives and the inability to take wolves as part of the predator removal program is contradictory to the department and Board of Game's intent of restoring a harvestable surplus of the herd as quickly as practicable.
D. Removing wolves as part of the IM program due to a court finding was unforeseen and affects the board's ability to provide for reasonable opportunity for customary and traditional wildlife uses of the MCH.
E. Not being able to remove wolves as part of the IM program delays the recovery of the herd needed for a harvestable surplus sufficient to allow for customary and traditional use of the population.

The requested change will provide the board with the opportunity to restore the portion of the MCH IM plan that included wolves that was invalidated by the Alaska Superior Court in March 2026 after the court identified deficiencies in the 2022 board record. The board has identified the MCH as important for providing high levels of harvest for human consumptive use and established population and harvest objectives of 30,000 – 80,000 and 2,400 – 8,000, respectively. The board established a positive customary and traditional use finding for the MCH and set an amount reasonably necessary for subsistence of 2,100 - 2,400 caribou.

The next regularly scheduled board meeting for the Central and Southwest Region is during winter/spring of 2027/2028. If the board accepts this ACR, the department recommends the proposal come before the board at its January meeting in Kotzebue, where there are other proposals to address hunting the MCH in Unit 18.

Sincerely,

Ryan Scott

Ryan Scott
Director
Division of Wildlife Conservation