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Submitted By
Jimmie Hunt
Submitted On
4/23/2015 2:55:37 PM
Affiliation

Dear Board of Game

I'm asking you to reconsider your action on proposal 207 and set a meeting to consider rescinding it. I am a pilot and I believe this regulation is to broad and should be rescinded. It is not in the best interest of the public in my opinion.

Thank you,

Jimmie Hunt



Submitted By

Joel

Submitted On

4/23/2015 1:19:58 PM

Affiliation

I very much support propoal 207 .. I think it would equalize the playing field . although possibly hard to enforce .



To: Alaska Department of Fish and Game
Board Support Section/ Board of Game
Fax 907-465 6094

From: John D Frost MD
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907-360-1301 cell, 907-562-5742 Fax
jdfrostmd@gci.net

Re: Proposal 207 Date: April 22, 2015 two pages

Dear Board of Game Members,

I would urge the Board of Game to call a special meeting for the purpose of rescinding the Board Generated Proposal #207, which was passed at the March meeting of the Board of Game in Anchorage.

I believe that the proposal as passed at the end of the Board session was not a good one and there are many unintended consequences that were not adequately considered.

The Board has three basic options:

- Do nothing and leave the regulation as passed
- Rescind the proposal
- Delay the date of implementation until after reconsideration at the statewide meetings next Winter.

The basic problem with the regulation is that it makes every resident sheep hunter who may try to access sheep country with an aircraft subject to prosecution for flying and spotting sheep. Even though unenforceable in most instances, it will almost certainly lead to modification of flying sheep hunters activities. It will increase rather than reduce crowding at the very beginning of sheep season. It may cause potential flying safety concerns either from the perspective of increased risk of midair collisions by increased crowding on August 8th and 9th or of pilots pushing bad weather to get to sheep hunting areas before the flying season is closed. Even if a hunter accesses sheep country with his plane prior to season, he still might be reported for flying and spotting sheep when he leaves the area after his hunt.

I have three personal anecdotes regarding flying safety while sheep hunting that are affected by this regulation.

- Last year I flew from Anchorage to the Northeastern Brooks Range with my daughter to hunt sheep. We knew exactly where we wanted to land because we had hunted there the year before. I arrived in the area about 9pm on the 9th of August. I had already been flying over eight hours for the day and was



tired. I chose to NOT land on the short high elevation strip because of fatigue and instead landed about 15 miles away on a big safe strip. After sleeping the night we got up and flew to the high strip in the early morning of the 10th. I circled the landing area four or five times assessing the wind, the landing surface area and the best way to set up for landing. Then I landed. We did not kill a sheep or even see a legal sheep (from the plane or from the ground). The safety of #1 not pushing and landing when I was tired and #2 making several passes on the landing area to assess the wind and any terrain changes since last year might be compromised by this regulation and the desire to remain absolutely legal.

- Many years ago on my first sheep hunt ever I was flying alone out of Bettles and went a full week before the sheep season, specifically to locate areas with sheep in them. I found a suitable lake and planned to fly into it on the 9th of August. But on the 9th the weather was bad and I chose to not try to push through Atigun Pass in marginal weather. That year the weather cleared up on the 10th and I flew in on the 10th and killed my first sheep with a rifle on the 11th.
- What is a hunter to do if he flies to a specific strip planning to hunt there and finds that the strip is blocked by other hunters or has been washed out since he was last there? Or what if winds and weather preclude him from getting to a suitable landing area? In either instance must he then go home without hunting or can he go and look for another suitable area in which to hunt?

I am aware that the Board of Game has had many proposals regarding problems with sheep hunting in Alaska. However nearly all of these proposals have been tabled, to be reconsidered next year. It is not clear to me why the Board felt it necessary to pass this one. Perhaps it was because it was the end of the Board meetings and you simply wanted to get home. Certainly there was not much public testimony in favor of this proposal.

I am concerned that this Board Generated proposal did not follow the protocol that you require of the public ie. It was not submitted by May first last year. There was not adequate time for public testimony and then the Board did not follow the public testimony that was given. I personally plan to submit a proposal for next year's statewide meeting by May first that asks to rescind the Proposal #207 and I believe many others will do the same.

Thank you for your consideration of my comments,

Sincerely,

John D. Frost MD

Submitted By
Josh Pepperd
Submitted On
4/23/2015 11:13:15 AM
Affiliation
Alaskan

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~~Alaska Department of Fish and Game - Board of Game

P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposition 207

Dear Board of Game Members,

I support a meeting to rescind Prop 207 and stand in strong opposition to this proposition for the following reasons.

- o UNSAFE. There were mid-air collisions on August 9th, representing decision-making compromises in favor of pilots.
- o UNENFORCEABLE. Every flight in sheep country is suspicious; none of it can be proved.
 - This will place a fiscal burden on the Department in a budget climate that renders such a measure irresponsible to employ resources for enforcement.
 - Due to lack of enforcement ability, there will be no way to measure the success or failure of this proposition relative to actual sheep population increases or declines. This will leave the BOG in an uninformed position for future management decisions.
 - Alaska airspace is a "Common Use Airspace;" Board of Game has no business attempting to regulate this Federal Classification of Airspace.
- o UNPOPULAR. Executive action by this BOG-generated proposal ignores recommendations from Troopers, local AC's, and majority public testimony.
- o INEFFECTIVE. There is zero empirical evidence to connect aircraft with crowding or animal counts.
- o UNALASKAN. This Proposition disproportionately impacts resident DIY hunters in favor of guided non-residents. We vehemently protect our other natural resources and then 'give' this one away to the detriment of the resource and the detriment of Alaskan residents. This is unacceptable!

Mr. Lew Bradley wrote an intelligent and informed analysis of actions that could be taken to proactively and accurately solve the sheep management issues. Please rescind Proposition 207 and work with Alaskans to find a real solution. Our natural resources cannot afford anti-Alaskan solutions that impact current and future generations!

Respectfully,

Josh Pepperd

CC: Governor Walker
Lt. Governor Mallot
Alaska Airmens Association
Alaska Attorney General
Department of Fish and Game – Sam Cotton Director
Alaska State Representatives and Senators

Submitted By
Keith Woodworth
Submitted On
4/23/2015 1:40:37 PM
Affiliation
N/A

Comments on Proposal "207"

When I first saw this proposal, I thought that it was so obviously slanted to commercial operator's interests that it wasn't worth further consideration. Based on the Alaska BOG's position I was wrong.

A review of how commercial activities associated with sheep hunting are (generally) conducted in Alaska has not been discussed- openly - that I'm aware of. From my noncommercial view point, this is how sheep hunting in remote areas is conducted.

Initially, licensed Guides with their staff of Apprentice Guides survey large areas of interest for ram bands, and access. Once a suitable hunting area is located. Steps are made to tie up the principle access points through the construction of improvements such as structures and runway "improvements", in some cases with (non-exclusive) land Management agency permits. Because hunter numbers are the name of this game, these sites are occupied by "camps" and employees prior to the beginning of the hunting season. Scouting and verification of ram bands was also completed prior to the sheep season opening date.

Camp access is either provided by the Guide or some combination of Guide and local Air Taxi Operators (ATO). The Air Taxi service providers have a more than likely unwritten agreement that the Air Taxi will not fly their own private clients into the area being hunted by the guide who is using his ATO service. There is nothing which precludes the ATO from flying hunters into other areas where there is no "Gentleman's Agreement" between ATO's over "exclusive" areas that they will provide access into. "Nitch Skill" access sites such as certain water bodies, or difficult spots are exclusive sites protected by skill levels or specialized equipment which others do not possess.

ATO/Outfitters provide sheep hunter access and other support into areas where they are normally not in conflict with Guides – to some degree. With sheep hunting areas, the concentration of hunters by several ATOs or outfitters may be high due to limited "safe" aircraft access points. In these operations, access and services are provided to a specific point which is known to the service provider who is being paid for; skill level, area familiarity and the possibility of seeing sheep. Fees reflect ATO costs, any equipment provided and if necessary preseason scouting costs.

In commercial operations, someone other than the "provider" is paying the operational costs. With Guides, the clients are clearly paying a lot of the costs but not necessarily all of the costs. With ATO's quite likely at some point, and often ongoing, the hunting public is paying for access and sheep location information on publicly managed areas in Alaska. This is done through contracts between ATOs or Federally licensed individuals who fly sheep and other wildlife surveys for both the State and Federal wildlife management organizations. In reality, this also includes pilots that worked for Federal or State agencies and as part of their jobs became familiar with specific areas and obtained a level of skill suitable for providing commercial services to interested Sheep Hunters.

A close analysis of "Proposal 207" would show that the impact on any of the above established commercial operators or those that might buy into an established commercial operation is nearly nil. For the most part, commercial service providers have already booked up their clients for the (this -15) season prior to opening day. Due to the limited huntable sheep resource, any new operation would have a difficult time locating a "conflict free" area to work in without public funding as explained above.

On the other hand, the impact on private hunters using personally owned or managed aircraft is that of nearly totally elimination from the hunting resident public. The flexibility to adjust for work requirements, weather events and avoiding the "commercially produced first day rush" would be eliminated under the "proposed regulations". Mid-season hunting opportunities for noncommercial hunters would really become a guessing game as the preseason ram bands would have been dispersed into other low or inaccessible hunting pressure areas. Commercial operations would be able to keep track of this movement or displacement through day to day operations or "historical area knowledge".

As a hunter that doesn't like to hunt during the often "hot" early season when meat care is a problem, this proposal would result in preseason overcrowding and occupancy of suitable access points. Therefore, "207" eliminates my flexibility and puts me in direct conflict with commercial operators.

My opinion is that any person using commercial services would support "207". Why not, it goes a long ways towards eliminating competition with private aircraft hunters. Anyone using road access or personally controlled river access means would be for or against with a leaning towards support (no skin lost). And for the private pilot, the proposal denies equal access to a publicly owned resource under the "guise" of management!

There are "seemingly" only two reasonable ways of resolving the existing sheep management issue; intensive management - we are all on permits and can fight over allocation ratios, or, reducing the length of the sheep season by starting on August 25th or later. Obviously, neither of these alternatives could be implemented for the 2015 season but the reduced season could be implemented in 2016. Under a total state wide permit system, the existing season dates could be retained. Under the shortened season alternative, commercial operators loose one and quite possibly two cycles of paying hunters while "locals" have to prioritize their fall hunting and possibly go prepared for bad weather in the high country. In either case The Sheep Win ... Something that "207" does not accomplish!



Keith Woodworth
Ester, AK 99725
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- Fax Transmission

To: Board

From: From: Ken Wolter

Fax: 19074656094

Date: 4/23/2015

RE: Rescind Prop 207

Pages: 1

Comments:

From: Ken Wolter
Sent: Thursday, April 23, 2015 9:32 AM
Subject: Rescind Prop 207

I Ken Wolter support having a meeting to rescind 207

Ken Wolter
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Wasilla AK 99623
907 982 9889

Submitted By
Kyle Jones
Submitted On
4/23/2015 2:17:48 PM
Affiliation
Alaskan

Proposal 207, according to Chairman Ted Spraker, is intended to address complaints about competition and reduce hunting pressure enough to avoid putting a permit system system in place. In reality, Proposal 207 will do neither of these things and I am opposed to this regulation. This law will not address the perceived overcrowding because there is not a widespread issue with aircraft buzzing sheep hunters during open season. This law will not reduce hunting pressure, because this will not keep hunters out of the field. I concede that even more restrictive laws that would outright ban the use of aircraft for sheep hunting would do both of these things, but only in the remote areas that are only accessible by aircraft. Overcrowding would skyrocket as these hunters move into areas that are accessible by ground.

I hold strongly the principals of ethical hunting and fair chase, and wholly agree with same-day airborne hunting restrictions. I use my aircraft to create separation from other hunters, not to give me an advantage. One of the greatest things about Alaska is my ability to study a map and set out in search of my own space, unburdened by the state or anyone else telling me where I should go. I can build my own understanding of how to safely and ethically harvest in that area. This regulation will completely forbid the harvest of any animal observed from the air for the entire season, regardless of how ethically it is pursued.

Under this law, I am exposed to frivolous accusations from anyone on the ground for doing what has been a fundamental freedom of Alaskan pilots: exploring. Or, perhaps worse, I am unfortunate enough to accidentally see a ram from the air and am now required to start the process over again, pushing on in search of a new area to hunt because by this regulation that animal is disqualified for the year.

The enforceability of this regulation is highly suspect in my mind, but in this realm of law the Troopers or federal enforcement can cite me, and, if they feel justified as part of further investigation, seize my aircraft as "evidence". It would then be my responsibility to prove a negative... more than one aircraft has been surrendered in settlement by pilots who cannot afford to lawyer up and go the distance in our justice system.

This regulation is a slippery slope, and has consequences that reach far beyond hunting into the restriction of activities within the national airspace. The regulation should be repealed, and put to bed as a knee jerk reaction that will accomplish nothing except provide a red herring for those seeking real solutions to the declining sheep population in the state.

Submitted By
Lars Gleitsmann
Submitted On
4/23/2015 2:47:11 PM
Affiliation
Mr.

Hi,

As the elected government affairs officer of an local Aviation Grassroots Organisation (the EAA Chapter42) I want to hereby oppose the Proposal #207 as written. The #207 as fostered by Ted Spraker and Ned Turner is very clearly a "Government Over-reach" issue:

The State of Alaska has the authority to create laws related to hunting. This is an attempt to create a law **regarding flying** by the **AK-State Board of Game**. The Board of Game should limit itself to hunting – **not flying**.

The Alaska Supreme Court has very clearly held that there are no superfluous words in statutes and, as such, every word has important meaning. I can provide citations for you. The proposal clearly states the following: Quote

1. From August 10 to September 20 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purpose of Dall sheep hunting. Using an aircraft for the purpose of spotting sheep or locating Dall sheep during the open hunting season is prohibited. (End of Quote)

The AK-BoG simply cannot regulate the use of aircraft that are not actively involved in hunting, as that is a matter of the FAA! Of course the BoG can regulate Aircraft use as part of hunting activities, which is ok and understandable, but this wording clearly does not draw the lines as it should. So, at best, we would see this as inept and uneducated wording by the BOG. Following statements made by Ted Spraker it is clear that this is a planned and deliberate action, way overstepping the boundaries of the mandate of the BoG. If actually applied as law, after review of the AK A.G. , it will never stand in court and there are already official statements by State-Troopers about it not being viable. There are many members of the local A.C. of the BoG that have already resigned in protest to the clear executive fiat committed by Ted Spraker. The A.C. Members said that #207 was not in fact based on desire by multiple public comments, but that it was made up by Spraker and Ned Turner. Rumor and Grapevine has it that it was based on Lobbying by a rich Lodge Owner who brings out of state hunter in by the use of horses. Be all that as it may; It is clearly not a viable regulation:

"From August 10 to September 20 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purpose of Dall sheep hunting."

This prohibits the use of aircraft between August 10-September 20 to do anything other than what is listed. So, for example, my son and I go sheep hunting and get two sheep. On the way out, we decide to take a fly-by of the kill site (several miles in). In doing so, a Trooper seeing me doing it. This is illegal. This conduct had nothing to do with fair chase or same day airborne, but it is illegal under this proposal. It is a restriction on flying.

"Using an aircraft for the purpose of spotting sheep or locating Dall sheep during the open hunting season is prohibited."

This is clear and unambiguous. This means that if anyone decides to fly in the Alaska Range to spot sheep for taking pictures, it is unlawful for him to do so between August 10 and September 20.

It also means that if I take a sheep this August 10 and decide that I want to fly around in the mountains of the Alaska range this September looking for 2016 sheep hunting spots, it is illegal.

The State of Alaska has the authority to create laws related to hunting. This is an attempt to create a law regarding flying.

They could have very easily and very clearly put out further restrictions on hunting and spotting animals from aircraft for the purpose of hunting, but instead they consciously chose to broadly restrict "flying in the mountains" for any other purpose. Of course this is in conflict with FAA rules and the general "fly as low as you want over un-inhabited terrain" etc etc. ... Here we clearly have a Government Entity, the Board of Game, that consciously voted (one member voted against this so called "Proposal #207") to exceed its mandate to regulate hunting and ventured into regulating flying...

It also creates serious safety hazards as pilots who know about this may fear enforcement of it and thus alter their normal operations to "stay legal". To fly low in the mountains is often necessary because of Cloud Layers preventing flight over the mountains, thus palnes fly through mountain passes. The same is true due to icing conditions and high wind conditions. With 82% of all Alaska Villages (official AK-DOT number!) not reach-able by the national road system, mounatin flying is a way of life in Alaska and often the only way for Essential Services.



So, we can only hope that #207 gets voted out or revoked. At a minimum the wording needs to be modified. If that is not the case it is clear to our membership and our national aviation organisations that there will be lawsuits as a follow up to curb this executive fiat. I also seriously doubt that the FAA will leave this "mission creep", as they might call it, be without any legal action.

Best Regards,



Dear Alaska Board of Game,

I, as a non-pilot resident hunter, strongly encourage the Board of Game to call a special meeting to rescind prop 207. I understand population dynamics and the need to regulate the sheep harvest. Certainly there are better ways to do so, without the arbitrary nature of this measure.

Thank you,

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Submitted By
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Submitted On
4/23/2015 12:21:14 PM
Affiliation

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Having read both proposals 207 and 208 ,submitted by the Board of Game I think both should be withdrawn or voted down. Proposal 208 is written in such a manner as to actually harm the resident sheep hunter. The Board has stated that they will not accept any public proposals dealing with season dates, permits, or bag limits, yet they are submitting their own proposals dealing with the same issues. The board needs to accept all proposal not just the ones they generate.

Testimony to Alaska Board of Game 2015

Circumstances have changed and sheep harvests are at an all-time low. The following is the testimony that I gave to the BOG in an effort to give them the facts as I see them concerning the plight of our sheep populations. I also offer some management steps that address the issues. I also testified at a 2013 BOG meeting much the same; stated at that time that if we don't put non-residents on a 10% draw allocation soon, within 5-10 years sheep harvests would be so low that we would be looking at a draw for not only non-residents, but residents as well. 167 concerned sheep hunters showed up at a work session in Wasilla and were saying a lot of the same things I am. So I am not just a disgruntled hunter wanting to kick the non-residents out. All sides recognize that there are problems, but a stalemate is at hand on how to go forward. Many proposals were before the Board and at the heart of the proposals is the 10% allocation. Consider the following information offered to the Board; then decide what is best for the resource given constitutional guidelines.

Addressing Dwindling Sheep Populations and Low Harvests

Interested people from all corners are concerned with issues involving sheep and the plight of our dwindling populations from a hunters as well as a management perspective. To say the least it is a controversial topic and evident that there is a resource shortage. Finally all parties involved are acknowledging this fact. Below are some brief stats from the months I have spent categorizing harvest stats over the past 30+ years of data taken from ADF&G's published numbers.

As of 2010 – Ave. ram harvest over the past 30 years is 1044 with an average of 2939 hunters. Current harvest as of 2013 was 708.

	<u>Year</u>	<u>Harv.</u>	<u>Res</u>	<u>NR</u>	<u>Res NR</u>	<u>Res % Htrs.</u>	<u>Harvest % Res/NR</u>	<u># Hunters</u>	
High	1989 –	1454	930	475	35%	77%	79%	64% Res 33% NR	3337
Low	2010 -	744	443	294	23%	65%	80%	60% Res 40% NR	2414
Curr.	2013 -	708	431	268	23%	63%	81%	61% Res 39% NR	2363

Established current facts:

1. Sheep harvests have declined steadily from the mid-1990's to the present (2015), from a high of 1454 to a low of 708 in 2013 which is a 51% reduction.
2. Sheep population estimates are down possibly 40-50% from those of the 70's - mid-90's.
3. Testimony from many veteran sheep hunters, guides and transporters verify that they are not seeing near the sheep on the mountain as in earlier years and in many cases, where used to see hundreds of ewes and lambs, there were only a few or none.
4. Weather patterns have changed since the late 80's and early 90's. We no longer get the cold dry winters, but warmer temperatures have brought record snowfalls and other year's very little snow coupled with melting and freezing conditions making it difficult for sheep to get to the feed. Also some very late springs by as much as 6 weeks in 2013 was devastating to older rams and new lambs. Record warm summers created dry conditions affecting the nutritional value and good fat supplies for them to go into the winter months on.
5. Predator control programs were severely hampered and mostly stopped during the Cooper and Knowles administrations which allowed wolf numbers to rebound, so it is no coincident that it occurred at the same time many populations of sheep, moose and caribou were dropping dramatically. Wolves are not the only recognized predator on sheep; bear and coyote numbers have increased as well.
6. Sheep hunter numbers have dropped by 20% over the same time period; 90's to 2015, mainly with Resident hunters; the reason is unclear, but probably because of lack of success and turning to other forms of hunting. The percentage is actually 35% reduction if compared to the high years rather than the average.

7. Hunter success for residents averages 23% while NR hunter success is 60%.
8. Non-Resident hunters average 40% of the total sheep harvest with some popular areas historically NR harvest was 60% or higher – example is 13D before going to a permit draw.
9. Registered and Master Guide numbers prior to the 1988 Owsichek ruling was around 200 compared to 600 today.
10. DNR said that 75% of assistant sheep guides are NR.
11. Since Owsichek 1988 there has not been a limit on the number of guides in a given GUA.
12. Since Owsichek 1988 guides have been able to apply for new GUA's on a yearly basis which does not encourage stewardship.
13. There are no quotas or limiting allocations in open state GUA's as to the number of rams one guide can harvest.
14. All other natural resources like timber and minerals have a resource fee attached to the harvest with the exception of our fish and game resources.
15. Alaska resident hunting & fishing licenses have not increased since 1993 and are less than found in most other states.
16. All Resident big game tags are free in Alaska except for Mush-ox and some brown bear. Most other states and provinces have tag fees for residents; the average sheep tag fee being \$194. The high is \$508 in Utah for a resident sheep tag. On top of that, some states charge a trophy fee when an animal is harvested; the highest being \$3180 for NR of Wyoming.
17. Most states allocate around 10% of sheep harvests for NR.
18. Alaska's constitution says we are to manage fish & game for sustainability and for residents first.

Related Sheep Management Problems:

Alaska's sheep populations are significantly down as well as harvest levels and quality of large rams 40"+ have dropped by 50-67%.

Intermediary reductions in NR allocations are not being implemented to address the shortage of harvestable rams, improve resident success and allow more sheep to survive to improve population levels. Harvest levels in areas hit the hardest have been allowed to reach a critical point at which they are put on permit draw status for both R & NR. Shouldn't recognition of the declining harvests trigger the management steps of **Residents First** by putting NR hunters on a limited draw prior to going to R draw? Limiting R opportunity without previously limiting NR harvest is not in keeping with what our constitution mandates as proper management of the wildlife resource that belongs to the people of Alaska, not NR.

The crowding issue keeps coming up and it is pointed out that 8 out of 10 hunters in the field are R hunters so the crowding issue is mostly from residents. 25% of sheep hunting areas were lost with the setting aside of Gates of the Arctic & Wrangell-St. Elias lands as National Parks in 1978 and implemented in 1980. Most of the Kenai and Chugach Mountains are permit areas now which has displaced hunters to other Mtn. Ranges. The Alaska Range has been hit hard. The Talkeetna's harvest has been low for years. The last strong hold, the Brooks Range, is rapidly being exploited and recent winters have drastically reduced populations there. Those few areas that harbor the remaining remnant of rams are being targeted; thus the crowding issue.

The fact that ADF&G depends on License and Tag Fees to supply a high percentage of their yearly budget appears to have them dependent on NR Fees since they pay more. The money trail has created a system that caters to NR and thereby allowing them to harvest far greater percentage of the annual harvest than is allowed in all lower 48 sheep states. We also virtually give our game away to both R & NR compared to fees assessed by lower 48 sheep states. Currently R pay nothing for a sheep tag compared to \$508 that Utah R pay. Also NR only pay \$425 for a sheep tag here while we can expect to pay as much as \$3180 for a tag if we are lucky enough to draw the typical 10% tag allocation for NR. Are we continuing to favor NR hunters because of the dollar amount paid? If R hunter license and tag fees were commensurate with those paid by R hunters of other sheep hunting states and NR hunters

paid a successful harvest fee similar to Canada, ADF&G would have better funding than they receive now. The allocation of the resource would be in line with that of other US sheep hunting states. The constitution mandate would be addressed and it appears to be the magic bullet needed that would address somewhat fewer rams available to hunters since the NR 20% of hunters is taking 40% of the annual harvest. It would address the crowding issue to a degree because less rams would be harvested by NR which makes more available for R to harvest. Sub-units 13D & 14A could be returned to general hunting because R hunters are not that successful (currently only 23%). It would solve virtually every issue except the over-harvest by predators that have not been managed for sheep population increases.

Management steps to help the low sheep harvest dilemma:

1. Go to a permit draw for NR on a 10% allocation of the current harvest. Since the 2013 harvest was 708, 71 rams would be allocated to NR and at their 65% success rate, 109 permits could be issued. This alone would leave 200 more legal rams on the mountain that is currently being harvested by NR hunters.
2. Increase License: Res Lic - \$50 Res Sheep Tag - \$200
& Tag Fees NR Lic - \$150 NR Sheep Tag - \$1000 NR Trophy Fee \$1000 if successful
3. Limit Sheep Guides to 4 rams/year
4. Limit transporters and air taxis to only be allowed to drop off 1 party of hunters each per landing strip for any given 7 day period. Designated landing strips might have to be gone to in order to keep some from landing on a different gravel bar nearby. The purpose is to keep down crowding and the same air taxis from dropping several parties on top of each other.
5. Restore GMU sub-units 13D and 14A to open general hunt status at full curl harvest minimum.
6. Divide all GMU's and sub-units with sheep populations into smaller hunting areas similar to that of sub-units 14C, 13D and 14A. Establish the number of harvestable surplus rams in each area and when that number is reached, emergency close it as is currently done in many goat area hunts. The only exception should be for NR guided hunters. They could continue to hunt since their guide may not have alternate areas to hunt. Their numbers would be minimal and would not cause a significant resource problem.
7. Finally; institute predator management statewide on wolves and coyotes. Allow aerial hunting and land and shoot by the public on state lands. This would be the most economical means to manage wolf populations. Guides could market hunts to NR hunters which would bring money into the state and help by reducing the predation on sheep by wolves. If this was not effective enough in keeping wolf populations at determined levels by ADF&G, then the department should collar animals in major wolf packs to make location easy and with the use of helicopters wolves could be surgically removed to reach the desired management goal for each area. Predator management was successful in increasing all game populations historically when it was used statewide. Compare that to game populations that have dropped significantly when it was not allowed or only done piece meal. It is time that the state not worry about out-side interest groups and manage our populations based on the science and trained biological opinion of managers hired to do the job without constraints of emotion, threats and law suits. Our state has enough money to fight these groups and not let them dictate how we should manage our state!

Lew Bradley



Submitted By
Linwood Fiedler
Submitted On
4/23/2015 1:11:10 PM
Affiliation
Alaskan resident

Phone
907-321-1012

Email
mushonalaska@gmail.com

Address
PO Box 135
Willow, Alaska 99688

Please resind 207. It is not the best way to regulate sheep hunting and targets the aviation community. 207 is poorly written as well and will be a legal nightmare for the state as pilots contest any conflicts with this regulation and its stipulations. There are several other ways to control sheep harvest. We all want a healthy sheep population but thhis is not the way to go about it. Linwood Fielder

Submitted By
Loren J Karro
Submitted On
4/23/2015 12:13:57 PM
Affiliation
Self

Phone
907-745-3712
Email
lorenk@mtaonline.net
Address
26239 E Buckshot Dr.
Palmer, Connecticut 99645

I would like to urge the Board of Game to reconsider their adoption of Proposal 207, as amended, at a special meeting called as soon as possible under public notice and other regulations. Time is of the essence, so that regulations can be clarified before the 2015 sheep season opens. I have testified numerous times before the Board of Game as to my belief that this proposal is illconcieved, unnecessary and an unworkable solution to nothing. It will not in any way alleviate the percieved overcrowding during sheep season, nor will it help disperse sheep hunters to different time periods or areas to hunt in. Indeed, it may well have the opposite affect of more sheep hunters going out right at the start of season so as not to break the law by spotting a sheep to hunt after August 9th. This proposal was adopted by the Board of Game at the last minutes of the Region 2 meeting, after all other statewide sheep proposals were either opposed or tabled until the statewide meeting. Written and oral public testimony, the Advisory Committee opinions, and even the opinions of Public Safety officials have all been overwhelmingly against this proposal. I also believe that the testimony by a Board of Game member that sheep killed after being spotted by air at any time prior to the hunt are ineligeable for entry in Boone and Crocket records was misleading, and will be shown to be incorrect. This proposal appears to be an attempt to single out and penalize hunters who use one form of transportation for one type of hunting. What about atv or aircraft use for moose hunting, or boat use to spot bears and deer along beaches (or airboats spotting moose on rivers)? Ethical use of aircraft is presently defined and regulated by the same day airborne regulation, which has worked well for decades, by the federal airborne hunting act and by FAA regulations, and use of aircraft for sheep hunting should continue under these restrictions and regulations.

I would further urge the Board of Directors to form a Dall sheep working group, which should work with the Department of Fish and Game and their biological studies, surveys, and resulting harvest goals, to formulate a statewide sheep conservation plan and sheep hunting policies. They should then work to recommend sheep hunting restrictions and regulations that recognize and conform with these findings. I urge the Board of Game to adopt no additional statewide sheep hunting regulations, unless necessitated by a biological emergency, until such a group has been convened and formulated a policy for review.

Thank you for the opportunity to comment, and for your time in considering these important problems.



Submitted By
Mark E. Amberger
Submitted On
4/23/2015 12:36:30 PM
Affiliation

Phone
9073734945

Email
marke111@mtaonline.net

Address
1423 N Shoreline Dr
Wasilla, Alaska 99654

Hello

I am totally opposed to the proposed Aerial Sheep Spotting Law proposal 207. This law is unenforcible. Many pilots notice sheep while flying visitors or while pleasure flying. The law is vague and seems to have no science backing it in the proposal. Flying and hunting is already prohibited. If specific flying is being used that spots sheep and information is communicated to clients on the ground target that group not every pilot that might see a sheep and is now accused of spotting. This hunter / pilot might decide to hunt in a area after a pleasure flight and now accused of breaking the law. This law is garbage and must not implimented.

Sincerely

Mark Amberger

Submitted By
Mark
Submitted On
4/23/2015 2:42:01 PM
Affiliation
none

Phone
907-232-5951
Email
akcub@mtaonline.net
Address
box 870623
wasilla, Alaska 99687

To whom it may concern

I object to the regulations relating to aircraft and sheep hunting. It currently is 2:30 pm on 4-23-15. I have just found out about the comment period 5 minute ago. Just the fact that this notice to comment was sent out yesterday with a timeline of 3pm today shows there are some serious problems relating to this regulation that affects so many. In a state that has the number of pilots that Alaska has (and are affected by your decisions) do you truly believe 24 hrs is enough time to get the word out for comments? Do the right thing and schedule the meeting to consider rescinding prop 207. Obviously there are some significant issues with this proposal.

Mark Englerth



Dear Board Members,

I was recently notified of Proposal 207. I am against this proposal for the following reasons:

1. Flying Safety- As a pilot for over 39 years, Proposal 207 could definitely increase the chance of mid air collisions. Like myself, many pilots are flying every time the weather permits to look for game and new hunting areas. That is one of the primary reasons we invest in an airplane. Proposal 207 will increase all of us pilots spotting for game and hunting areas into a more precise time frame. When you limit the days a pilot can fly, coupled with small weather opportunities, especially in the mountains, it is a recipe for disaster.
2. Pilot harassment- Any aircraft flying after Aug 10, regardless of the reason, could be reported to the Troopers as a possible violator of Proposal 207. Pilots who are flying for moose areas to hunt during the rut, could be reported. I don't believe putting pilots into a situation of justifying to the Troopers why they are flying in the Talkeetnas looking for moose is the proper law to enforce.
3. Hunting reality- Anytime that we hunt we are well aware that some factors might alarm the game and they move away from our location. Wind shift, fog, other hunters, bears, helicopters, and any unusual noises etc. All these factors can happen and scare that trophy ram. Most pilots I know, who spot hunters in an area will fly somewhere else and try not to alarm the sheep. If sheep hunters see an airplane flying too low or harassing game, report it to the Troopers. But don't pass Proposal 207 and stop law abiding pilots from flying when they have good weather and an opportunity to get into the mountains. That is why we bought the planes in the first place, the freedom of flight. Please don't take that freedom away!

Marlin Dubetz

Submitted By
Martin Hinshaw
Submitted On
4/23/2015 2:17:42 PM
Affiliation
None
Phone
907-947-4052
Email
Martin@hinshaw.org
Address
4645 N. Gunflint trail
Wasilla, Alaska 99623

I am not a sheep hunter. I do own several aircrafts and I do spend a lot of time in the mountains, flying and camping. I often have to search for landing spot. Lot of circling, spotting and low approaches. Probably the same maneuvers a sheep hunter/pilot would do.

We all know when it comes to these violations, you are guilty until proven innocent. So what happens when a guide calls in my tail number and turns me in for what was my mountain flying? We all know I will have to fight to prove my innocence at great cost to me.

This is really a very stupid way to solve this problem. I hope you revisit the logic and come up with a better solution.

Submitted By
Matt Soloy
Submitted On
4/23/2015 12:30:21 PM
Affiliation

Phone
232-9597
Email
matt_soloy@hotmail.com
Address
P.O. Box 874645
Wasilla, Alaska 99687

~~I am writing to support rescinding proposal 207.

Proposal 207 generates nothing but problems for Alaskan resident hunters. When this proposal was passed by the board I believe some major consequences were over looked.

- Congested air space just prior to season could cause mid-air collisions
- Higher volumes of air traffic before season causing undesirable hunting areas
- Will cause a sense of anxiety, panic, and urgency to hunters
- Completely unenforceable and a waste of time for state troopers to try and prove
- Will cause crowding for all hunters with all types of transportation
- Solves nothing for managing the state resource
- Unconstitutional

The board of game got this one wrong. This does nothing to solve anything with sheep management. If the public and the board feels the need to restrict hunters for the sake of saving the resource, then restrictions must be put on non-residents first. Guides on state lands are allowed to take as many hunters as they can and harvest as many animals as they want. These hunters will typically be non-selective. How can you allow letting sheep populations and quality to decline and allow having guides doing this? Allocating a certain amount of sheep tags to guides on state land would certainly drive the price for a hunt up, allowing the guide to still make a living. On top of all that a guide does not make his living solely on sheep hunters.

When I am scouting for sheep hunting, I am not just looking to see if there are sheep in the area, I am just as equally looking to see if there are people in the area. Would it be fair for me to have to try and defend myself from accusations of "scouting for sheep" just because I was flying to make sure I did not cause a conflict? If I see a camp or other planes I move on. Hunters that don't have planes most certainly can hire someone to scout around before or they most likely have a friend that would be willing to fly around. I chose flying as my mode of transportation in the field, and have a high degree of commitment to do so. Why is it fair to take that away from Alaskan hunters? Would it be fair to limit somebody based on their physical ability or there quality of gear or rifle?

Proposal 207 is unsafe, unfair, unenforceable, unpopular, and ineffective. Please get this right and rescind this proposal.

Submitted By
William King
Submitted On
4/23/2015 11:49:35 AM
Affiliation

Alaska Department of Fish and Game - Board of Game

P.O. Box 115526
Juneau, AK 99811-5526
Re: Proposition 207

Dear Board of Game Members,

I support a meeting to rescind Prop 207 and stand in strong opposition to this proposition for the following reasons.

- **UNENFORCEABLE.** Every flight in sheep country is suspicious; none of it can be proved.
 - This will place a fiscal burden on the Department in a budget climate that renders such a measure irresponsible to employ resources for enforcement.
 - Due to lack of enforcement ability, there will be no way to measure the success or failure of this proposition relative to actual sheep population increases or declines. This will leave the BOG in an uninformed position for future management decisions.
 - Alaska airspace is a "Common Use Airspace;" Board of Game has no business attempting to regulate this Federal Classification of Airspace.
- **UNPOPULAR.** Executive action by this BOG-generated proposal ignores recommendations from Troopers, local AC's, and majority public testimony.
- **INEFFECTIVE.** There is zero empirical evidence to connect aircraft with crowding or animal counts.
- **UNALASKAN.** This Proposition disproportionately impacts resident DIY hunters in favor of guided non-residents. We vehemently protect our other natural resources and then 'give' this one away to the detriment of the resource and the detriment of Alaskan residents. This is unacceptable!

Mr. Lew Bradley wrote an intelligent and informed analysis of actions that could be taken to proactively and accurately solve the sheep management issues. Please rescind Proposition 207 and work with Alaskans to find a *real* solution. Our natural resources cannot afford anti-Alaskan solutions that impact current and future generations!

Respectfully,

William A. King

Submitted By
Neil DeWitt
Submitted On
4/23/2015 1:34:05 PM
Affiliation
Anchorage AC

To all members of the BOG,

Since your vote on proposal 207 (air planes and sheep) I have not talked to one person happy or that supports your decision. With this info I request you reconsider your position and reconsider proposal 207. At the reconsideration meeting I request you resend your vote. After the resended vote I request you let the AC's know and bring it back up for a vote at the state wide meeting in Fairbanks, as everyone expected in the first place. With this we the AC's can possibly get the public input and get it forwarded to the BOG.

This process of short notice isn't working. I hope you will change back to your old ways and give the AC's time to do their jobs. Also there are rules that in my oppinion have not been followed(meeting notices). Please give us the required notice so we can do our jobs too.

Thank you for your time and service on the BOG

Neil DeWitt

Anchorage AC Member



Submitted By

Orion Harger

Submitted On

4/23/2015 1:02:00 PM

Affiliation

I believe this a half measured knee jerk reaction for Game Management and is poorly and unclearly focused at the Aviation Population and Industry. It is Poor and unclear policies like this that will litter our legal system with problems. My first question is how will you measure or determine what is Aerial spotting. If I were to be black bear or goat spotting/ hunting am I going to have to prove or justify why am flying through the mountains potentially with financial or legal requirements.

Do not specifically target the aviation community for sheep hunting and create a monumental legal conundrum for the courtroom and enforcement officers with proposal 207. If the intent is reduce sheep harvest to sustain the population there are many other ways to accomplish this. Keep it fair to all Alaska hunters, close off an area entirely to hunting till populations rebound, make an area a drawing hunt. Manage the units with complete restricted access as has been done in other Areas but include aircraft (wood river, yanert river).



4/23/15

Dear ADF&G,

I support having a meeting to rescind Board action on Proposal 207, as amended, related to aircraft restrictions during sheep hunting seasons.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Richter", written over a horizontal line.

Patrick Richter
1508 His Way Lane
Edna Bay, Alaska 99950
(907)594-6312



4/23/15

Dear ADF&G,

I feel meeting should be held to rescind Board action on Proposal 207, as amended, related to aircraft restrictions during-sheep hunting seasons.

Thank You,

A handwritten signature in black ink that reads "Heather Richter". The signature is written in a cursive style.

Heather Richter
1508 His Way Lane
Edna Bay, Alaska 99950
(907)594-6312



4/23/15

Dear ADF&G,

I support having a meeting to rescind Board action on Proposal 207, as amended, related to aircraft restrictions during sheep hunting seasons.

Thank You,

Spencer Richter

Spencer Richter
1500 Emerald Cove
Edna Bay, Alaska 99950
907-617-6719

Submitted By
Paul and Donna Claus
Submitted On
4/23/2015 1:44:40 PM
Affiliation
self

April 22,2015

TO: Alaska Board of Game

RE: Teleconference Friday, April 24, 2015

Our family has been hunting sheep in Alaska since the 1950's. We are recreational hunters, have a guiding operation in a Federal Area, own an Air Taxi and have subsistence rights to hunt the sheep. We see all sides of this argument. We hunt recreationally for ourselves and occasionally we will go on a subsistence hunt.

There are several points that we would like to make.

1. Tough decisions need to be made. Someone will find you wrong NO MATTER what you do. Just make firm decisions based on careful thought and ignore the whiners. We have sheep to protect and laws that have to be followed in order to keep the Federal officials out of state business.
2. The animals of Alaska are NOT owned by the people of the state but we are responsible for taking care of them. No one can own a wild animal. If we own them then they are domestic so lets get that off the table. We need to manage them in such a way that they will continue to freely inhabit their lands in good numbers and recognize that no one owns them.
3. Federal law mandates the rights of U.S. citizens over the exercise of policing wildlife. If a state is inconsistent by denying or granting limited access to wildlife based on residency then this is denial of equal protection under the federal Constitution. This is deemed to be an interfering in the "immunities and privileges" on a federal level. Unless you are willing to go up against the Federal courts this one needs to be followed.
4. There have been federal cases brought concerning fees non residents were charged compared to residents that were accepted by the Supreme Court, see Baldwin v. Montana Fish and Game Commission., (\$9.00 vs. \$225 recreational elk hunting) Here in Alaska the comparable amounts far exceed Montana already. Do we want to challenge this one in Federal court?
5. Then we go to the commercial side of hunting. It is hard to think about interstate commerce here in Alaska as we are so removed BUT, it is recognized fully on the Federal side of things. There is a long standing legislation called the dormant Commerce Clause that applies to commercial endeavors. There are several instances of Federal Court taking states to task for limiting the commercial side of hunting. For instance Arizona and South Carolina have gone to Federal court with their regulation of commercial activities. They were both found to substantially affect and discriminate against interstate commerce and are now under strict scrutiny or banning of their laws specifically. Already in Alaska according to Fish and Game records there is a 5 to 1 ratio of Alaska hunters to outside hunters over the last five years. This hardly says that outsiders are responsible for hunting more than citizens of the state. They are already held back by the simple fact they are required to have a guide for sheep and Alaskan's are not. This apparently satisfies the Clause although we don't know if it has ever been challenged in court. Someone else may be able to fill us in on that one.
6. Now we get to airplane use. Our life is centered on airplanes as there are no roads anywhere near our place in a National Park. We live on property that has been in the family years before the Jimmy Carter era. We raised our kids here, have commercial hunting, recreational clients, and an air taxi. Once again we see all sides of this debate. But, want to share some thoughts. If someone can tell us how on earth policing of airplanes spotting animals is going to work, let us know. We fly our planes for hunting and recreational adventures during hunting season. There are places to land within our guide areas but, IF you are a good pilot you will circle potential landing spots several times looking for safety problems. The pilot may not even be aware of sheep below him as landing without mishap is the main goal. For someone on the ground who has the animal in sight it looks as if he is circling the animal. So, now with sat phones and cell phones, any time a plane is circling above it is "spotting sheep" and will be reported. Who is going to field these calls? Who is going to have to forgo being out in the field making personal contact with hunters and guides to sit back in the office and listen to this circumstantial and unprovable mayhem? By what standard is someone spotting a sheep?
7. Just for your information hunters on foot-it is close to impossible for a pilot to find a person who is intentionally wanting to be found let alone someone who not wanting to be seen. Just because a plane flies over you and you THINK he saw you chances are no one is even aware you are around unless by some pure chance you are seen. Many times we can't find our own people on the ground even when they are jumping up and down and waving things. To assume you have been seen or that the pilot is looking for you is rather silly in most cases. Good grief, animals have been shot out from under our hunters many times and we didn't even know anyone was on the ground with us. And, our hunters have gotten an animal out from under other hunters whom we didn't even know they were there let alone see them from the air.
8. For years, there has been an ethics rule to not spot specific sheep and we have followed that rule closely. We do not pick specific



sheep for a hunter. But, we also don't think it is ethical to drop someone somewhere with the hope of stumbling into sheep. We know where they generally are and take our hunters there, but we don't go for a specific from the plane and most times we don't know if they are rams or ewes.

9. We know there are guides who take to the skies and harass others and we know our hunters have been harassed by others, but for us this is not an option, our business is too important to us to risk law enforcement run ins. For all those who don't own planes, it is horrible to be charged with a crime as you will lose your plane, business and hope for the future. Most of us simply will not risk it, we just can't. You must think of that when you are accusing others of these kinds of things.
10. If you take an air taxi into your hunting area are you not looking out the window the ENTIRE time and sometimes asking the pilot to circle around an area for a closer look or do you put shades over the windows so you can't see? Is this spotting sheep?
11. For those of you that walk in to an area, our hats are off to you. We do that with subsistence, sometimes going 60 to 70 miles with endless up and down. It is hard work and it is painful when a plane load of hunters flies over you. Maybe there should be more walk-in only areas? There is one that is relatively close to us and we do try to avoid it when we are flying. But, we do feel your pain, and we really do respect you.
12. Now for the kicker. It would be very hard to find someone who depends fully on sheep for their survival. Our world simply doesn't have a place for that for the most part anymore. The 80 to 100 pounds of meat just doesn't make for a survival animal. Yes, it is the best in our opinion but to say that it is a needed subsistence animal is stretching it. It is a WANTED meat source as it is incredibly tasty and healthy. We make sure we take every last scrap of a sheep and it is immediately put in fridges and processed for the freezer. That option is not available for most hunters. We see the backpacks that supposedly hold a whole sheep from hunters who are doing their own thing. But they are going to have some tasty and appreciated meals and should be able to have them as long as there are enough sheep on the mountains.

Our Proposals, based on these and other arguments.

1 sheep every two years for residents.. If you are so dedicated that you want to take one every year, there is a way to do it: Move to a subsistence community. There have been many of us who have sacrificed other things to do this. And a question? How many is enough?

1 sheep for nonresidents every three years. This affects guides more than anyone but it values our sheep higher on the world market. It brings us closer to the true value of these magnificent creatures. (This would include those who hunt as relatives.)

More walk-in only areas if possible?

If there is public cry out for airplane law. How about 24 hour fly and hunt for EVERYONE? Private, Guide and Air Taxi. This affects us all in all facets equally. But to have the 207 proposal is a giant black hole of accusations and recriminations that cannot be proved one way or the other.

These proposals are equal for ALL Alaska hunters. Everyone gives up something in order to begin the protection of the animals. For those hunters who have an aversion to outside hunters you can be happy that they will be punished more.

We bring these with great thought, a bit of humor but more than that a desire to protect these creatures. We would give up our hunting and guiding rights for them if it was needed. We expect others to have the same philosophy. No one owns these animals, no one has more right to harvest them than someone else and no one should stand in the way of their protection.

Paul and Donna Claus



April 22, 2015

Dear Board of Game Members:

I am a lifelong Alaskan, born and raised here 46 years ago. My first sheep hunt was at age 12 (1980) with my father in the Brooks Range.

Please seriously consider a future meeting to discuss rescinding Proposal 207. I feel strongly, as many of my fellow Alaskans do, that this proposition is unsafe, unenforceable, unpopular, and "unAlaskan". Most importantly, it is an ineffective means to solve the sheep hunting issues concerning competition, over-crowding, and lower sheep populations.

Sincerely,

Paul G. Ferucci
11830 Moose Road
Anchorage, Alaska 99516
(907) 830-6971
ferucci@alaskan.com



Submitted By
Paul Lacey
Submitted On
4/23/2015 2:37:23 PM
Affiliation
Aspiring Sheep Hunter

I moved to Anchorage last May for work with abundant hunting opportunity being my biggest attraction. Long story short, I highly anticipate sheep hunting and will likely be hiking from the road system for the next couple years.

Since I've sheep hunting with a general tag off the road system is rather tough I hope to one day be able to afford an air-taxi service into sheep country. Not having the luxury to pay for multiple trips I do not expect to get more than one opportunity a year at a maximum once I can afford it. With my work's construction schedules and weather I may not be able to go out for opening day. Not being able to scout remote areas from air would make my dream much less likely.

As a blue collar Alaskan, I cordially ask you to not approve this proposition and keep my dreams and many other hunters aspirations alive.

Thanks for the consideration,

Paul Lacey



April 23, 2015

From: Pete Dickinson
36275 Mere Circle
Soldotna, AK 99669
907-252-4022

To: Alaska Department of Fish and Game
Board of Game
Fax: (907) 465-6094

Board of Game members:

I am lifelong resident of Alaska and writing to ask that you rescind proposition 207 as it does not represent Alaskans true intentions of the management of sheep.

- The proposition, if enacted into law, will make the first part of the season crowded and unsafe with so many hunters in the field at the same time.
- It is already illegal to harass game from a plane. If done properly, sheep and people will not be affected by flying. Conversely, AK State Troopers will be overloaded with cases to investigate alleged misuse of planes, taking away from their real job of catching poachers and those who are hunting illegally.
- The ability to enforce this proposition would be nearly impossible costing the state and citizens. The proposition does not put more sheep on the mountain; it is the dumbing down to the lowest level for the benefit of few (liberalization). Everyone has the same opportunity to be successful at what they put their effort toward. This is America isn't it? Will you take guns away next because the gun hunters are more successful than the primitive weapon hunters?
- I am an avid sheep hunter and have been fortunate to take some nice trophies. Over the past ten years, I've passed on many sheep as I have not found one better than what I've already taken. A plane allows you selective opportunity to take a good representation of the species and not the first legal sheep spotted, which in most cases is a young ram that should be left to grow, procreate and become the best class of ram possible for some fortunate hunter to potentially take.
- The proposition negatively affects local resident pilots and those who use planes to scout. It is discrimination against locals who have worked hard for the ability to use a plane or fly one themselves. I have hunted sheep for over 20 years and use an airplane to scout where older sheep live and where others are not hunting. If I see a camp or people, I look elsewhere or come back at a later time.
- Guides will still be allowed to fly in and out of areas without suspicion and will know exactly where to go before the season starts. If this proposition passes, if a non-guided hunter goes hunting in ANWR on Sept 1st, he would have to fly blindly into an area where a guide may have clients hunting in already. Neither the guide nor the non-guided hunter want this.

Didn't most advisory boards advise against this? How did it pass? The Board of Game needs to seriously look at the impact of this proposition for all parties concerned and stop it immediately. There are alternatives that could satisfy most everyone that would be ethical and fair to all parties.

Regards,


Pete Dickinson

Submitted By
Ricky
Submitted On
4/23/2015 11:20:36 AM
Affiliation

Phone
907 841-4001

Email
rdolfi@live.com

Address
PO Box 1337
Palmer , Alaska 99645

Greetings,

Thank you for taking the time to read my comment. I'm a born and raised Alaskan, I intend on this being home for the remainder of my life. I have a strong commitment to preserving Alaska, and doing my part to ensure that my children experience the same breathtaking experiences.

Being fortunate to have been raised in an outdoor environment involving aircraft, hunting, and fishing. In my youth, I was able to experience sheep hunting and the mountain adventures with my Dad, it's one of my most cherished moments. I have longed to share the same experiences with my daughters and son. For my entire life I have experienced flying in the mountains and partaking in various activities, hunting, camping, rock climbing, fossil hunting, blueberry picking etc... There are many activities throughout the summer season I intend on sharing with my family in the mountains. Due to my adventures I experienced in my youth, I had set out on a lifelong dream to own a plane. I was not able to afford one, so I bought a wrecked SOA department of interior Supercub, and we began the long rebuild process. My family and I worked as often as possible to raise extra money, we were able to finish it in September 2014 and looked forward to starting our adventures.

Having recently read the Proposal 207 and seeing some of the comments from board members such as "never feel sorry for an airplane owner", I'm severely disappointed. I feel not only is sheep hunting jeopardized with Proposal 207, most all of the activities we do in the mountains is at risk... I feel it is in part, an assault against General Aviation, especially with the previously mentioned comment... This is how many feel, and partly why this proposal has reached the AOPA and Alaska Airman association, it is now being published nationwide... How is it, I'm doing other activities, not related to sheep hunting, simply flying and camping in the mountains, that I can be reported and expected to defend myself? Summer is short, there are many activities that one could falsely mistake for spotting sheep or hunting during August and September... I offer an open invitation to any of the Board members to come enjoy a flight or two with me, I'd love to show the amount of activities that we partake in that Proposal 207 jeopardizes. Please reconsider this proposal and recognize this does not address the issues you are trying to solve.

Kind Regards

Ricky Dolfi

(907) 841.4001

Rdolfi@live.com



Submitted By
Rob Stapleton
Submitted On
4/23/2015 12:25:54 PM
Affiliation
Aviator, Professional photographer

Phone
9072309425

Email
robstapleton@alaska.net

Address
1497 N.Heather Meadows Loop
Anchorage, Alaska 99507

I am in favor of having the special meeting to address the text and verbage in Prop 207 that may limit flights in the mountains during sheep hunting seasons.

RS

Wasilla Dental Center

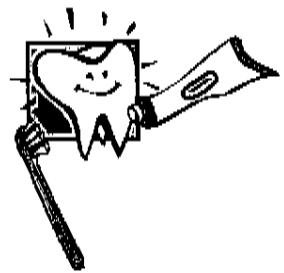
Robert Cassell D.D.S
Brian Wight D.D.S
Justin Coffman D.D.S

351 W Swanson Suite #1
Wasilla, AK 99654

Fax number: 907-376-7855

Phone number: 907-376-5315

Email: clinic@wasilladentalcenter.com



FAX COVER SHEET



Date: 4-23-15

Number of pages (Including Cover Sheet) one (1)

From: Robert Cassell

Message To: Game Board Fax Number: 907-465-6094

Comments:
- Support having a meeting to review progress 2015
- Include proposals for state-wide seasons and bag limits
for non-resident hunters

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Submitted By
Robert Churchill
Submitted On
4/23/2015 2:50:13 PM
Affiliation

Phone
9072798927

Email
rock4@gci.net

Address
3415 Wentworth St.
Anchorage, Alaska 99508

My comments are related to Proposal 207 which is currently under discussion by the Board of Game. In order to put my comments in perspective, let me share some of my experience with natural resource issues in Alaska. I was a member of my local Fish and Game Advisory Committee for approximately 10 years and a member of the Board of Game for approximately 4 years. In addition, I served a number of terms on the Southcentral Subsistence Council. In that time I always asked myself when it came to considering new regulations the following: 1. Is the regulations necessary; 2. Is the regulation understandable; 3. Is it enforceable and 4: Are there significant unintended consequences.

I'm not sure this regulation is necessary as we have regulations regarding both same day hunting and harassment of game from an aircraft. However my concern is that many of these hunts are out of base camps which hunters either fly into or are flown into. This would potentially put any hunter who arrived by aircraft in a position of being accused of using the aircraft in violation of this regulation.

Further this could put pilots in a situation of flying into their final destination in marginal conditions the day before the hunt to avoid the appearance of violating this regulation.

I would appreciate it and feel it would be beneficial if this regulation were rescinded by the BOG. This could be reconsidered under the state wide regulations at another time.

Thank you for your time

Bob Churchill

Submitted By
Robert Stone
Submitted On
4/23/2015 2:19:14 PM
Affiliation

Dear Board of Game,

I support a meeting to rescind Proposition 207. I strongly oppose Proposition 207 and encourage you to rescind it.

-The State of Alaska does not have jurisdiction over the airspace.

-Proposal 207 is an attack on private pilot hunters.

-There exists no evidence that restricting "spotting" to before the season will increase sheep populations.

-Proposition 207 will not stop spotting for sheep, it will instead crowd all pilots into the August 1-9 window, thereby creating a dangerous mid-air collision problem.

-Proposition 207 will pit the guides against the non-guided Alaskan residents because the non-guided hunters (being unable to spot) will land on established strips instead of looking for sheep and other places to land. These strips are currently used by guides. There will be conflict.

-Proposition 207 is unenforceable. Proposition 207 will cost the State a tremendous amount of money and resources for enforcement. Every flight in sheep country is suspicious and could lead to enforcement actions. There will be an increased amount of litigation over whether pilots are spotting or flying.

-The Alaska Airmen oppose Proposition 207

-AOPA opposes Proposition 207.

-SCI opposes Proposition 207.

-EAA opposes Proposition 207.

-The Troopers acknowledge that enforcement will be very difficult.

-The Local AC's oppose Proposition 207.

-Proposition 207 is a danger to pilots and passengers because you are placing pressure on the pilots to fly during a certain time frame, without regard for weather.

Thank you for allowing me to voice my opinion.

-Rob Stone

Submitted By
Rod Arno
Submitted On
4/23/2015 2:07:54 PM
Affiliation
Alaska Outdoor Council

Alaska Board of Game members,

The Alaska Outdoor Council (AOC) is fully supportive of expanding the Call for Proposals for the Alaska Board of Game (BOG) March 2016 Statewide meeting to include 5 AAC 85.055. If indeed the majority of board members who voted to defer Board Generated Proposal (BGP) #208 to the 2016 Statewide meeting were considering the conservation of Dall sheep populations statewide than you will also vote to include 5 AAC 85.055 in the call for proposals.

It's hard to understand why the board has waited until 6 days before the deadline for the public to submit proposals to the next scheduled BOG statewide meeting regarding sheep hunting opportunity after the majority of the BOG members chose to defer their BGP #208 a month ago. Again if the intent of those BOG members who voted to defer BGP #208 to the statewide meeting is due to concerns of Dall sheep conservation it would be consistent with state statutes and regulations to allow the public to have input in the BOG regulatory process. AOC requests that the BOG would inform the public as soon as possible of their action to extend the submission deadline date to allow the public to submit proposals under 5 AAC 85.055, once the BOG makes the right decision to include 5 AAC 85.055 in the call for proposals to the BOG 2016 Statewide meeting.

AOC does not support any sheep working group created by either the BOG or the ADF&G until such time as the department has published an update of the 1974 sheep management plans statewide. Clearly BGP #208 is intended to re-allocate the harvest of full curl rams statewide. Until the department can provide the public current data on the available harvestable surplus of rams there is no reason for a group of stakeholders to meet to consider who gets to harvest sheep resources on a sustained yield bases for each sheep population.

AOC asks that the BOG rescind the amended BGP #207. Changing the current hunting culture in Alaska by singling out aircraft access is a tall order for the majority of the BOG members to try and achieve. Since the public overwhelmingly opposed proposal #207 at its last two scheduled meeting and the fact that there was no conservation concern addressed by adoption of the restrictions on aircraft use for sheep hunting AOC feels it would be in the best interest of preserving the BOG regulatory process by voting the amended proposal 207 down. If the public, department, or the board want to regulate game locating by motorized methods they can submit such proposals at statewide regulatory meetings.

AOC is supportive of allowing the Alaskan hunting public to have ample opportunity to participate in the BOG regulatory process regarding Dall sheep management statewide.



4/23/2015

Roger A. Denny Jr.
P.O. Box 770752
Eagle River, AK 99577

Alaska Board of Game
1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Agenda for April 24, 2015; Comments on Topics Related to Sheep Hunting

Dear Members of the Alaska Board of Game:

I appreciate that the Board has put the following topics on its agenda for a teleconference on Friday, April 24, 2015:

1. Expanding the Call for Proposals to include proposals related to statewide hunting seasons and bag limits for sheep, and extending the proposal deadline if necessary.
2. Request for a future meeting to consider rescinding Board action on Proposal 207, as amended, related to aircraft restrictions during sheep hunting seasons.
3. The schedule for a Board meeting to consider agenda change requests submitted for the 2016 Board meeting and to discuss establishing a sheep working group.

These comments support (1) expanding the Call for Proposals and extending the deadline, and (2) a future meeting to consider rescinding Proposal 207. If these two topics lead to improving the situation, then it should be unnecessary to consider agenda change requests for 2016 and establishing a sheep working group.

A. Two initial observations.

Two reasons appear to account for the fact that resident sheep hunters have offered so many proposals in recent years. First, although the number of resident sheep hunters vastly outnumbers (by about four to one) the number of nonresident sheep hunters, the success rate for nonresidents is much higher (often about twice as high) such that nonresidents now account for over 40 percent of the statewide harvest and approaching 60 percent in some game units. Many resident sheep hunters feel this current state of affairs cannot continue. Otherwise, the State will be unable to offer reasonable sheep hunting opportunities to residents. Second, Alaska has yet to join most western states in limiting nonresident harvest of comparable big game species to about 10 percent of total harvest. Many resident sheep hunters believe the State needs to do so.



- B. Expanding the Call for Proposals to include those related to statewide sheep issues such as seasons, bag limits and resident versus nonresident participation, and extending the proposal deadline, will facilitate solutions.**

If the two foregoing observations characterize the current situation more than short-term vagaries in sheep populations due to events like hard winters, then the Board would be wise to expand the Call for Proposals to include those related to statewide sheep issues. This should include is related to (a) 5 AAC 92.008, (b) resident versus nonresident participation, (c) overall sheep harvest, (d) seasons, (e) bag limits, and (f) any other statewide sheep issues.

Doing so allows the Board to respond to the past efforts by the public to offer proposals, and therefore puts the Board in a better position than it would be in if it restricts the public's opportunity to offer proposals.

- C. The Board should scheduling a meeting to consider rescinding Proposal 207, as amended, and withdraw Proposal 208, so as to facilitate solutions.**

By the same token, if the Board addresses statewide issues, then it is likely that (a) Proposal 207 will be unnecessary, and (b) consideration of Proposal 208, which lacks any relationship to previous public proposals and does not meet the Board requirements for an agenda change requests, will be rendered moot. Therefore, the Board should schedule a meeting to consider rescinding Proposal 207 and withdrawing Proposal 208.

- D. If expanding the Call for Proposals and scheduling a meeting to reconsider Proposal 207 lead to improvements, then it should be unnecessary to consider agenda change requests for 2016 and establishing a sheep working group.**

People participate in the Board process because they have faith that doing so helps the Board. For that reason, I am skeptical of altering the process by using agenda change request (particularly when the criteria do not seem to be met), or by establishing a sheep working group that inevitably seems to lead to greater voices for those represented than those not. The Board has at its disposal all the information and the tools necessary to address sheep issues. It can do so best by hearing from the public directly, rather than through the perspective of some special working group.

Thank you for your time!

Roger A. Denny Jr.
41 Year Alaskan Resident

Submitted By
Scott Kolstad
Submitted On
4/23/2015 2:46:15 PM
Affiliation

Dear Board of Game Members,

I am in favor of a future Board of Game meeting for the board to consider rescinding proposal 207, and I encourage the Board of Game members to rescind proposal 207.

I am opposed to proposal 207 as it unfairly punishes one user group (resident hunters with airplanes and their hunting partners), will likely result in widening the harvest success gap between resident hunters and guided nonresident hunters by reducing the success rate of resident pilots/hunters, it is likely to increase hunting pressure early season and put later season hunters at a disadvantage, attempts to regulate use of airspace, and ultimately does not address the real issue at hand of a decreased sheep population.

Proposal 207 unfairly targets one user group, resident pilots and their hunting partners, and will widen the success gap between guided non-resident hunters and residents by reducing the success rate of resident pilots/hunters. Certainly some guides use airplanes to spot sheep during the sheep season; however I don't think guides will be as affected as resident hunters since they know their areas a lot better and can justify spending the required time scouting preseason. For example a 2 week scouting trip in the Brooks Range would not be feasible for most resident pilots/hunters. However if a guide depends on sheep hunting as a profession, he is able to invest the time and money preseason as required (and write off his expenses). Also, if a resident pilot/hunter does invest the time and money into a scouting trip or two prior to the season, finds where he wants to hunt, then returns during the sheep season only to find another hunter or guide is the spot he had scouted preseason, then under 207 that pilot/hunter is not allowed to go look for another place to hunt and results in a very frustrating situation that could increase conflict in the field.

Proposal 207 also punishes hunters who are lucky enough to draw a later season limited drawing sheep permit. Early season permit hunters would have an advantage that they could spot sheep up until the time the season opens. After the 1st and 2nd season permit hunts have passed, the sheep will have moved to different locations compared to preseason due to hunting pressure. The 2nd and 3rd season permit hunters would be at a disadvantage to the 1st season hunters as they would not be allowed to fly the area to relocate sheep that they may have scouted preseason.

This will likely increase early season hunting pressure for general harvest areas as well. Early season hunting pressure is already a problem and does not need additional concentration of hunters.

Proposal 207 also attempts to regulate airspace in mountainous areas of Alaska during sheep season. Only the Federal Aviation Administration (FAA) may regulate the airspace of any part of the United States, not the Alaska Department of Fish & Game or the State of Alaska.

Ultimately proposal 207 does not address the real problem at hand of a decreased sheep population. Please rescind proposal 207 and form a sheep working group to look at the issues in detail and come up with sound recommendations that will benefit the resource, the sheep, and ultimately benefit all user groups.

Sincerely,

Scott Kolstad



April 23, 2015
From: Shae Reed
36257 Dawn Drive
Soldotna, AK 99669
(907) 398-8912

BOG members,

My name is Shae Reed. I am writing you today to ask that you please rescind proposition 207. This proposition has so many problems and does not address the real problem at hand, sheep populations. I understand there are issues with dall sheep hunting in Alaska but this proposition is not going to help with the underlying issues. This proposition is going to make the first part of the season very crowded, which in turn makes it unsafe with all the pilots and hunters being in the same area at once. Proposition 207 was supposed to make this stop.

This proposition is effecting local pilots very negatively, locals have worked very hard to get and use airplanes ethically. Yet the guides will still be able to fly the areas without suspicion, they know where they will be taking their clients before the season even starts.

Harassing game from a plane is already illegal, if done in the right manner, people and sheep will not be affected by flying as they have since planes were originally used for hunting. Proposition 207 is going to make flying around August 10th very dangerous in the mountains. Proposition 207 makes no sense.

Please do the right thing and stop this badly written proposal and work on better alternatives.

Regards,

Shae Reed



Taiga Resources Conservation



PC126
1 of 5

a management and consulting firm specializing in conservation based natural resource industry support. We provide industry, governmental, regional, and community assistance in understanding, developing, and maintaining conservation based initiatives that will help sustain long term stewardship for important social/cultural atmospheres, fish, wildlife, land/water habitats, and industry developments within them.

HC60 Box 299C Copper Center, Alaska USA 99573 Phone: 1.907.822.3410
Email: taigaresources@gmail.com Web: www.taigaresources.com

April 23, 2015
Lower Tonsina, Alaska

Alaska Department of Fish and Game
Board of Game
P.O. Box 115526
Juneau, AK 99811-5526

Re: Written Testimony for the April 23, 2015 Special Board of Game Meeting

Dear Alaska Board of Game,

The following comments are submitted by Taiga Resources Conservation for whom I am the founder and CEO. They are submitted from my knowledge and long history of representing wildlife conservation, hunting and the professional guide outfitter industry within Alaska and the United States.

Please know that I continue to serve by nomination from every United States Professional Guide and Outfitter Association and joint appointment of the Secretaries of Interior and Agriculture on the bipartisan Whitehouse created Wildlife and Hunting Heritage Conservation Council. From this history, knowledge and advocacy the following comments are submitted.

Proposal 207: For the best interest of Alaska, our wild sheep populations and all people who enjoy knowing that Alaska cares about prudent stewardship and respect for them, I fully support the BOG adopting this proposal as you have and strongly urge you to continue with your support for it.

This proposal as passed begins the process of respect that our wild sheep populations and all hunters and conservationists deserve. Yes, you will hear a hue and cry from people who depend upon an airplane to find and then kill wild sheep or those who have been conditioned to believe that using an airplane to find and kill big game animals is an acceptable means and method of harvest. I disagree with this cry for the short and long term best interest of the whole.

This proposal is very important for our wild sheep that deserve our respect and all

people, whether they be people who just enjoy seeing or hearing about healthy wildlife populations and know they are being taken care of respectfully or those of us conservationist/hunters who know that hunting goes hand in hand with the great North American Model of Wildlife Conservation.

You as the Board of Game have the responsibility and the ability to steer Alaska's wildlife conservation and hunting heritage into the future and I believe that for this heritage to be viable and sustainable, the foundation has to be built within the state founding fathers constitutional mandates with the additional side boards of "Resource First and Fair Chase" ethics.

Resource first is simple; we do not hunt or book hunters unless we have harvestable surpluses of healthy wildlife populations. Currently, we have serious concerns over wild sheep science, inventory and overcrowding of sheep hunters nearly statewide. How could you as the BOG not support actions such as Proposal 207 in light of these serious concerns? You are right on track with this proposal and I urge you to continue to support it.

Some will suggest that you as the Board of game should not have to address ethics. This is a wrong supposition as our ethics as hunters spell our future to hunt. Taking this vein a little further, the truth of it is that only six percent of America's human population hunts and about the same percentage of Americans oppose hunting, with the remaining 88 percent who hinge the balance of steering the pro or anti-hunting percentage.

With the rate of ecotourism and wildlands being visited by non-hunting public throughout many of our sheep ranges growing, we have to be fully respectful and cognizant of the delicate balance we have.

In today's world here in Alaska, any person who uses an airplane to search over habitats which may or probably does have other hunters or non-hunting public within them to find an animal to kill is working against the best interest of the whole and against the principles of fair chase.

I wish there was a way in which I could place each of you in the many instances during my thirty plus years of guiding sheep hunters and hunting sheep in Alaska that my clients from all over the world have had to stop their quality wilderness fair chase hunts to sit and watch a pilot or multitudes of pilots with their airplanes search every nook and cranny of the sheep habitats searching for rams, and when they find them, grinding the country to determine if the rams are trophy quality and legal and then, systematically search the country to find the closest place to land, followed by landing, setting up a camp, often multitudes of trips to support additional hunters or clients and then an effort the next day, to kill the sheep identified from the air.

As a general resident hunter example, on my wife's and my only ever personal hunt over thirty years ago we utilized an air taxi service to drop us at a location, found a

band of mature rams, conducted a long stalk just in time to have an airplane fly into the valley we had been placed, buzz our camp, clearly see us and the rams and then conduct a systematic hazing to run the rams out of the country. This noise brought a legal bull moose out of the brush below our camp which we decided to focus on only to have the airplane spend a number of passes running him out of the country as well. Our one and only personal sheep hunt had been ruined. Reaching out to the FAA and AST a few days later we were told that they had so many similar complaints that they could not follow up on them.

There is a long history of airplane use by hunters in Alaska and it is an important manner and tool with which to continue to support hunting with. However, using the plane as a tool to find and then kill a specific animal is not in the best interest of the whole.

It was not surprising to see Dr. Brinkmans survey results and then see your proposal addressing airplane use, and then see that the majority of the ACs did not support it. ???

Do we think this concern is just going to go away? Are we naive enough to believe that it will not grow?

Dr. Brinkmans work showed the dissatisfaction sheep hunters have with aircraft impacting their sheep hunting experience. There are numbers of resident hunters and guides who have historically explained to me that it takes between 40 and 200 plus hours of flying to produce a 40 inch ram. This type of impact on the country, the wildlife, and other hunters, especially those who cannot afford to own or operate an airplane is just not right.

Any professional guide, air taxi or transporter should know the habitats and the wildlife populations within them well enough to know how many hunters they can book to have good harvest success without having to jump into an airplane or multiples of airplanes to go and search over habitats other hunters or tourists are enjoying, to find an animal to kill.

As well, any resident hunter should be able to recognize that an every year harvest of a once in a lifetime ram is not respectful of the whole. Resident hunters, guides or transporters all have the ability to fly habitats before the sheep season to discern population densities that support a quality hunt.

I encourage you again to support your proposal to limit the use of aircraft, to encourage hunters to respect the wildlife and others in the field and to take it even a bit further and incorporate the same standard that the BGCSB adopted some years ago that prohibits the use of an aircraft to spot an specific animal with the intent to harvest that animal.

O yes, you will hear the cry and theory of how unenforceable it is and how any flight may be misconstrued to be seen as a flight to search for a specific animal etc..

This is not sound reasoning. With today's current and growing high tech photography and videography ability in the field, anyone who resorts to negatively impacting wildlife, other hunters or non-hunters in the field is subject to rapid identification and recording of defined actions. Any reported history of such actions also lends itself to enforcement.

Or the cry of, if you are going to restrict airplane use to kill an animal with you need to also limit horses, boats, atv's, etc.. The true response to this is that we do not utilize these other forms of access to conduct wildlife population density surveys with and they do not represent the potential abuse factor that aircraft do. This issue is not about this mode of access versus that mode of access, it is rather, an issue of "respect for the whole".

Truly, anyone who steps into a plane and uses it to locate an animal to kill regardless of the impact it is causing to the wildlife, the wilderness experience of others or to other hunters in general, knows what those impacts are and if they don't, they should.

They also know what the more respectful use of aircraft is to the whole when they are used to support the logistical aspect of a hunt rather than used as a tool of harvest. I believe that it goes along ways towards preserving Alaska's wildlife conservation and hunting heritage to take the high road here and to show the average Alaskan hunter and hunters from around the world that we do respect them and the resources and the quality of the experience they are dependent upon or hoping to enjoy.

Please continue to support proposal 207 as passed.

Please also turn together and work to create a sheep management working group. After many years of watching and participating in wildlife conservation throughout North America, I firmly believe that the people which would be incorporated into such a group can better influence prudent, respectful and needed stewardship conservation than what can be expected by the wildlife and conservation agencies on their own. Your BOG process is the most democratic of all wildlife conservation and management programs. However, this particular issue in light of conflict, needed science and turning together warrants establishment of the working group.

As Always, Most Respectfully,



Robert Fithian





April 23, 2015

From: Tanya Dickinson
36275 Mere Circle
Soldotna, AK 99669
907-252-4022

To: Alaska Department of Fish and Game
Board of Game
Fax: (907) 465-6094

Board of Game members:

I've been an avid hunter all of my life and just recently started sheep hunting. I became aware of proposition 207 and was immediately disgusted by the intentions of the proposition. It is discrimination in its simplest form to the residents of Alaska.

The season, particularly the first part, will be overly crowded and causing unsafe hunting conditions. State troopers will be flooded with cases to investigate, costing the state and citizens unnecessarily. The ability to enforce this proposition would be nearly impossible.

A plane allows selective opportunity to take a good representation of the species and not the first sheep spotted when hiking in 20 miles or a young full curl ram that should be left to grow to an older age and better class. When you do not selectively take the largest and oldest sheep out of the population, you essentially kill two rams; 1) a younger full curl ram that you chose to kill and 2) the old ram that dies of old age on the mountain that a hunter did not have the ability to scout.

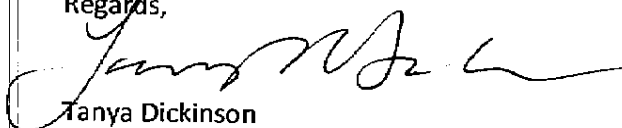
Guides will still be allowed to fly in and out of areas without suspicion and will know before the season starts where they are going to put clients. Under 207, if a non-guide leaves to hunt sheep in ANWR on September 1st, he would have to fly blindly into an area and possible hunt in an area that a guide already has clients in.

The proposition is a politically driven piece of garbage and represents dirty liberal politics. The State of AK Constitution states that game is to be managed for the residents of the state, not for profit-making guides.

I find it very hard to believe that this proposition was ever passed when I have yet to find a single advisory board that was in favor of it.

The Board of Game needs to find whatever ethics they have and stop this proposition. There are better alternatives that need to be explored and the residents of Alaska need to be the first party concerned when a proposition is made.

Regards,



Tanya Dickinson

Submitted By
Thomas Scarboro
Submitted On
4/23/2015 2:21:54 PM
Affiliation

The Board of Game should include proposals relating to season dates, permits & allocation, and bag limits for statewide consideration. The board should clearly state what proposals it will accept and not accept for the statewide meeting next March. The comment period should be extended because the process has been very confusing for people wanting to submit proposals.

The Board should rescind proposal 207. Since Proposal 207 is unenforceable, it is a waste of the State's money during a time of budget shortfalls.

If a sheep working group is formed, it should consist of current biologists from the Alaska Department of Fish and Game and knowledgeable residents. It should not consist of members who make money off the resource who will make decisions benefiting them.

The board should look at requests from the public and not generate their own proposals. I have never seen a proposal that mirrors Proposals 207 & 208. Where do these ideas come from? There should be more emphasis on resource management for resident hunters. Let's put Alaska and Alaskans first.

Respectfully,

Thomas Scarboro

Submitted By
Tony Caligiuri
Submitted On
4/23/2015 12:27:22 PM
Affiliation
Boone and Crockett Club

Phone
641-414-3797
Email
tcald@boytharness.com
Address
1 Boyt Drive
Osceola, Iowa 50213

Dear Sirs

We have been asked to clarify the Boone and Crockett Club's position on aircraft with regards to time frames and use as it applies to the club's acceptance of record book entries under the club's rules of fair chase. The club was asked to clarify this issue with regards to Alaskan sheep entries in 2007 and our position remains the same today. Please reference paragraph four from a July 4th, 2007 letter from Eldon Buckner, Chairman- Records of North American Big Game Committee to Wayne Kubat,

"In summary, Boone and Crockett is going to continue to accept trophies taken legally in Alaska as long as the required time after flying, as specified in Alaska regulations, has been honestly observed"

Unfortunately, I am unable to attach the entire letter due to the format of the comments portal but it is on file with Boone and Crockett and I have forwarded a copy to Dan Montgomery, board member of the Alaska Professional Hunters Association as well.

Please do hesitate to contact me directly or B&C headquarters should you need additional information.

Sincerely

Tony Caligiuri

Member, Boone and Crockett Board of Directors

Deputy Chairman, Big Game Records Outreach Committee



RE: Proposal 207 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Modify sheep hunting opportunities statewide.

BOG members,

My name is Travis Drake and I am a resident Alaskan that hunts sheep annually. I am writing you today to ask that you please **rescind** proposition 207 as I do not think it addresses the issue of declining sheep populations. This proposition will create further strife between Guides and resident hunters and will turn known landing strips into crowded camping sites for many airplanes and hunting parties. Safety is a concern for this centralized activity as well.

If this proposal becomes law it will be difficult to enforce. There will be many calls to the State Troopers but these calls and subsequent investigations will fail to make cases against offenders because it will be very difficult to prove someone was flying around looking for sheep or a new sheep area. Additionally it is already illegal to harass game from a plane.

This proposal will allow guides to get into areas before the sheep season, set up camps and deter hard working Alaskan residents (*who only have limited, planned vacation time to spend afield vs. guides who can take months off and collect \$ from clients then leave the state with their cash having not contributed \$1 to conservation*) from being able to chase our game. Now we will land, get in arguments with guides and compete for the same sheep in a centralized area.

In closing, this proposal negatively effects local resident pilots the most. It is simply put, discrimination against locals that have worked hard to get and use airplanes ethically.

Please do the right thing and stop this poorly written proposal and work on better alternatives that keep sheep populations and Alaska Residents first.

Sincerely,

Travis Drake

22668 Sambar Loop

Chugiak, Alaska 99567

mallarddrake03@hotmail.com or tdrake@gci.com



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April 23, 2015

Alaskan's and ADF&G.

I strongly encourage a special meeting to rescind prop 207. The exploring/hunting/flying/Alaska rights and experience is at harm. This regulation takes impossible measures to ensure little to nothing. I love and respect this land and law and encourage you to do the same.

Kindly and Respectively,

Tyler Loken

Submitted By
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Submitted On
4/23/2015 1:53:26 PM
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Fairbanks Fish and Game Advisory Committee (FAC) Comments – Special Non-Regulatory meeting of the Board of Game, Friday, April 24th, 2015.

The FAC has been notified of the special Board of Game meeting that has been called for Friday, April 24th. We note that there are three discussion points for the Friday meeting, the first of which is to expand the Call for Proposals for the March 2016 meeting so that seasons and bag limits for statewide sheep may be addressed by the public and to extend the proposal deadline. As the notification of the meeting came out on Wednesday the 22nd, there is not time to call a meeting of the AC. Our last meeting was April 8th, and at that meeting we approved several proposal submissions for the 2016 statewide meeting but none of them addressed sheep as we could not propose any new regulations on seasons and bag limits at that time. Additionally, if we are be given the opportunity to submit sheep proposals, we could not make the current May 1st deadline for proposals due to the inability of the AC to meet in time to approve any new proposals (not enough time for proper public notice). If the deadline was extended to June 1st, the AC could decide to meet and possibly submit new proposals.

The second discussion point in the notice is to set up a future meeting to consider rescinding the BOG's action on Proposal 207. At the 2015 Wasilla and Anchorage BOG meetings, the Fairbanks AC gave written and verbal testimony opposing all of Proposal 207. We would like to take this opportunity to restate our position on this proposal :

Proposal 207 would impose restrictions on sheep hunters, guides, transporters, and air taxis that would prove very costly for all involved. The proposed restrictions are rife with enforcement issues and there is wide concern that these restrictions will be carried over to all big game species. Under 12 AAC 75.340 (d) (8), big game guides are already to, "avoid using any aircraft in any manner to spot big game for the purpose of taking a specific animal..." The Fairbanks AC voted unanimously to oppose Proposal 207.

The third discussion point references scheduling a Board meeting to consider agenda change requests for the 2016 meeting and to discuss establishing a sheep working group.

The Fairbanks AC has previously submitted comments on the formation of a sheep working group. To restate those:

1. The sheep management plans are the purview of ADF&G and they should be allowed to complete the review and update first.
2. Once those plans are revisited then ADF&G can come to the ACs and public with the new plans and begin a discourse.
3. The FAC does not favor a statewide focused working group, it would be too broad and difficult to make effective. Successful working groups have been very focused, such as the 40 Mile group, Western Arctic Caribou Herd, etc.
4. The FAC is opposed to having too many special interest groups involved and think it should mainly be an effort between the ACs and ADF&G.
5. Our vote on this issue was for the following motion, "The FAC opposes a working group as the only solution to the proposals and issues surrounding dall sheep hunting. The issues are too diverse and complex for solution by a working group." The vote was 9 in support, 1 against, and 1 abstention.

Thank you for your consideration of our comments and thoughts.

Fairbanks Fish and Game Advisory Committee



Submitted By
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Submitted On
4/23/2015 2:40:46 PM
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self

Being on the board is a thankless and intense responsibility and I appreciate the effort every member puts forth. However, I feel strongly that the BOG got it wrong - very wrong, when they passed proposal 207 dealing with airplane restrictions, and I feel that consequences from passing 207 negatively impacted ADF&G. Several sporting groups got together and worked hard to support HB137 to increase license revenues in light of state budget cuts to ADF&G from declining oil revenue. A majority of advisory committees and the public were offended by 207 passing, and those parties then contacted their legislators, and HB 137 crashed and burned. Several million dollars of revenue to ADF&G went away, and management in the future will suffer. The BOG should make a good faith effort to the public to rebuild their trust and confidence and rescind 207 ASAP.

Several false statements were made by board members during deliberation. Chairman Spraker's testimony during deliberation that sheep that are spotted and harvested under Alaska's same day air borne regulations are illegal to enter into B&C is false and wrong. The letter from B&C that Chairman Spraker referenced also had some mis statements and the Board will be receiving a letter from B&C shortly retracting some of the statements in that letter. Also, Chairman Spraker and Vice Chair Turner both made statements to the effect that general flying around on the valley floor looking for other camps is permissible, but the wording of what was passed does not allow that. Chairman Spraker and Vice Chair Turner's statements that this wasn't a BOG generated proposal just doesn't stand up. The public had years to submit this proposal on their own and never did. Vice Chair Turner's statement that the public didn't submit their own proposal because they didn't know the BOG had authority to do so is also a weak argument and a big stretch.

This proposal is excessively broad and puts suspicion on any one flying a plane in the mountains during sheep season, which could subsequently lead to hunters having to regularly defend their use of airplanes. AWT stated on the record at the Region 2 BOG meeting that it would be hard to enforce because it only applies to sheep. It could also cause safety concerns if a pilot refrains from doing multiple passes and go a rounds on marginal strips because he's afraid of being sited for spotting. Also, we heard from the sheep survey and ADF&G that most sheep hunting effort occurs during the first 10 days. This proposal will only make that worse, as more hunters will opt to hunt early to avoid the risk of getting sited. Some current draw areas have multiple and/or late start dates, and the current proposal restricts aircraft use for several days in advance on some of these hunts. Additionally, this is an extremely divisive issue that does nothing to put more sheep on the mountain and stands to unravel any effort to come up with meaningful regulations and better management strategies.

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4/23/2015 2:08:58 PM
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As a sheep hunter that has not spotted sheep from an aircraft I see little to no reason to apply a longer than next day flying restriction to sheep hunters. Sheep hunting is a challenging endeavor, and the use of an aircraft to spot the sheep is very little advantage to the hunter the big scheme of the hunt. I suppose next you will want to take away spotting scopes, because it gives an unfair advantage. Having an idea where the sheep are prevents unnecessary wildlife interactions that impact the habitat of our sheep.