

Unit 19C Sheep

PROPOSAL 76

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen all Unit 19C sheep hunts as follows:

Full curl management is the best option biologically for Dall sheep management supported by our ADF&G biologist. I propose that the Board of Game (BOG) reinstates the subsistence sheep hunt as previously allowed. As well as reinstate a nonresident hunt of one ram every four regulatory years with hunt dates of 8/15-9/10 annually.

What is the issue you would like the board to address and why? The nonresident and subsistence season for Dall sheep in Unit 19C. Dall sheep have been shown to be on cyclical patterns since the beginning of their study and tracking in Alaska in the 1920s. Full curl management has been implemented since 1992 and this is one of the most conservative approaches to sheep management in the United States that have sheep. This ruling was decided on at a time where Dall sheep were at remarkably similar numbers to their current numbers. We have seen an abundance of sheep in 2003 and 2018 since that time. Biologist support this management strategy and do not support closures. The numbers seen in Unit 19C are paralleled in other units of the state including those in national parks where no hunting is permitted. This is a predator and weather issue much more than it is hunter take. Over the past five years numbers of hunters have declined by 62%, this is resident, nonresident & subsistence hunters. The numbers are reflecting the effort in the field and self regulating already. By closing two user groups down this will send more pressure into other areas of the state and create even more problems. ADF&G studies have shown that the mortality rate of Dall sheep greatly increase after eight years. This population which is legal to hunt is going to die of natural causes and go unused. This eight year old population is also at the end of their competitive mating life. Not managing these animals does not add sheep on the mountains.

PROPOSED BY: Anthony Marchini

(EG-F23-268)

PROPOSAL 77

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen Unit 19C to sheep hunting as follows:

The Board should rescind Proposal 204 as passed in Soldotna.

What is the issue you would like the board to address and why? The Board erred greatly by passing Proposal 204 as amended from the last Board of Game meeting in Soldotna.

I urge the board to rescind its actions on Proposal 204 which was “faulty” on several fronts. Here are a few of the elements which were disregarded:

Board-Generated Proposals

The Board should be receiving proposals from the public, not creating its own proposals that it then passes. This action essentially supersedes the rights of the public and appears to be a conflict of interest since the board can hardly be unbiased as to its very own proposal.

Conservation to Discrimination

The drafting of board-generated Proposal 204, based on emotion and not facts, was written as a self-perceived rescue operation for the sheep of Unit 19C by precluding all hunting for five years. This is so outlandish it clearly has absolutely no basis in fact for its creation, either for the duration or the severity of the proposal. But somewhere along the chronology of the discussion, the conservation motive was cast aside for an arbitrary and capricious substitute precluding only nonresident sheep hunting. There was no legitimate reason to discriminate against nonresidents.

Board of Game Usurps the Commissioner's Authority to Manage

We can see the first duty of the Commissioner in statute is to manage. So why did the board step in and presume to do so by creating Proposal 204? If there really was a conservation concern, the Commissioner could at any time create an emergency order to modify the harvest. But there wasn't a conservation concern on the part of the real manager to justify the board's actions, therefore the Board overstepped its bounds in creating and passing Proposal 204.

Ignores the Economic Wellbeing of the State per AS 16.05.020

In sheep hunting across the state, if you don't include the sale of Governor's tags, nonresident sheep hunters contribute about 86% of the sheep hunting revenue that goes to the Fish and Game Fund. Residents contribute 14%. Historically in Unit 19C nonresident hunters contribute 95% of sheep hunter funds going into the Fish and Game Fund. So if the statutes require, in the decisions about how wildlife should be managed, that the "general wellbeing of the economy" be given credence, under what mathematical system would the board exclude the users who pay 95% of sheep hunter revenue in Unit 19C? Before the current weather mediated lower sheep numbers, equal numbers of resident and nonresidents hunted in that unit each year. With the Pittman-Robertson match residents on average over five years brought to the Fish and Game Fund \$18,000 per year while nonresidents contributed \$367,000 annually. Failing to consider the importance of the economic implications of the final outcome of the board's decision, precluding nonresidents is clearly nothing short of a grievous fiscal error on the part of the board.

Ignores the October Department Sheep Report

In October the board called on the department for a "state of sheep" report. Department staff gave a wonderful and detailed report, and in so doing said straight out the decline in sheep numbers, where they occur, are weather-driven, AND there is NO CONSERVATION CONCERN. The board apparently failed to hear what everyone else heard from these dedicated department sheep biologists. But the department again sent the same message to the board at the recent Board of Game meeting, and the board appeared to have not heard it. It would be inappropriate if this occurred because the board was so invested in their own proposal (read conflict of interest) that they once more ignored what the experts had to say and acted in contrary to the data provided them (twice). Indeed, if there is no conservation concern as stated by the managers (the department), why did the board act so egregiously by taking matters into its own hands thinking they had the data and scientific knowledge greater than that of the department's

experts?

Ignores the Protective Nature of Full Curl

It is widely known and accepted by biologists who have been in the business for several decades that a full curl harvest regime is helpful to the population as a whole in that only the surplus mature rams are harvested. The father of sheep biology, having proved the benefits of full curl, and this work was retested on Dall sheep¹, Testimony was given to the Board of Game that this regime is the most protective to sheep while also keeping the young rams from over stressing at breeding time and wearing themselves out trying to copulate as they would without the presence of mature rams to disincentivize them from acting out. Oddly, in Units 7 and 15 where the sheep situation is much worse off than that in Unit 19C, the board just let full curl ride, but in Unit 19C, a lesser affected area, the board went straight to not letting full curl do its job and instead did the irrational thing by precluding hunters when there was no reason to.

Going Emotional Instead of Relying on The Science

I was told that a retired trooper in the hopes of precluding any sheep hunting in Unit 19C (where his son got a 42” ram a couple years ago) was saying if there are no rams to break trail in the snow for the lambs, the latter would die. If it is true, this story got any traction at all it is a fanciful fabrication. Lambs don’t hang out with rams. They stay with their mothers who don’t hang out with the rams either. The board must base its decisions on truth and data as shared by the department’s experts, not on emotional tales invented to elicit an emotional response.

Ignores the Adaptability of Sheep

Sheep have been in Alaska for thousands of years. And in those years there surely must have been fluctuations in population numbers. We know that parts of Alaska experienced both tropical epochs followed by deep glaciation. Sheep are adaptable. They have probably suffered much worse than things are now in Unit 19C, or even Units 7 and 15. They will be fine. The current low numbers are due to weather events, and they will rebound. Until then there is no reason or any scientific basis to curtail any hunting at this time.

So please rescind what was passed for all the wrong reasons of Proposal

204. Thank you very much.

¹The author provided names of individuals which were redacted as a matter of proposal policy.

PROPOSED BY: Karen Gordon (EG-F23-315)

PROPOSAL 78

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years.

Harvest ticket. August 10 - September 20 [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, “Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.” This cyclical pattern is well documented in the 2022 Board of Game (BOG) Dall’s Sheep Informational Meeting Presentation that was presented by ADF&G. In 1945, 1992 and 2022 were all noticeable downturns in overall sheep populations. In retrospect, an abundance of sheep were observed in 1930, 1968, 2003 and 2018. The department opposes a closure of Dall sheep hunting but remains neutral as to who gets to hunt Dall sheep based on historical trends in Dall sheep populations and the states full curl eight-year-old regulation.

The board adopted the full curl regulation in 1992 and is one of the most conservative approaches to Dall sheep management. The harvesting of full curl, eight plus year old rams is just a small fraction of the overall population and the empirical evidence has shown to have no detrimental effects on the overall population. This regulation has allowed the department to have a longer hunting season and provides ample opportunity for all to hunt a full curl ram. Full curl regulation has been the best management tool for 30 years now. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, eight plus year old rams makeup less than 5% of the overall sheep population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season. The full curl eight plus year old ram resource will go unutilized when hunter participation is limited and or restricted. Since the start of the decline, Unit 19C has seen a significant decline in Dall sheep hunter participation. In 2018, Unit 19C saw a record number of participants at 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. That is a 62% decline in sheep hunters in a five year period. Why? The short answer is self-regulation. ADF&G records of hunter participation show that during low levels of a game population, less hunters go to the field. Unit 19C Dall sheep hunter participation shows this exact trend. As the sheep population declined and overall success rates decreased, sheep hunters turned their attention and focused their efforts in other areas of the state. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. On the flip side, the five year period leading up to 2018 saw a steady increase in Dall sheep hunter participation due to good numbers of sheep and higher than normal success rates. Hunter participation will rise and fall right along with the rise and fall of Dall sheep populations. The department estimated 40 harvestable rams in Unit 19C for the 2022 season and records show that 27 residents participated in the hunt. Again, the Dall sheep resource will go unutilized by limiting nonresident

participation.

If nothing is changed, a harvestable number of rams will go unutilized in Unit 19C. Other units will see a noticeable increase in Dall sheep hunter participation. Not only in guided nonresident hunters but also in second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. On a side note, any Alaska businesses that are related to nonresident sheep hunting will suffer.

PROPOSED BY: Spencer Pape, Seth Kroenke, Jeff Rost, and Jon Burrows (EG-F23-307)

PROPOSAL 79

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen Unit 19C to nonresident sheep hunters as follows:

Unit 19C Dall Sheep Hunting Season Dates 2024:
Nonresident Hunters: Aug 10 - Sept 20, 2024.

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting opportunity within Unit 19C.

Dall sheep management in Alaska has been successfully conducted for several decades by utilizing the “Full Curl” concept of management which recognizes that harvest of older age class rams does not impact overall sheep population trends. This is a long time proven scientific basis that has successfully spanned numerous historical varying Dall sheep population trends, eras, and regions throughout the state without requiring changes to allocation.

Through addressment of an out of cycle proposal (2023 instead of 2024) relative to closing nonresident Dall sheep allocation within Unit 19C, the proposal as passed was emotionally driven, ignored long term proven scientific management, was out of bounds in relation to the integrity of the process, and hurtful to those who depend upon the scientific driven conservation basis of wildlife management.

By deviating from proven, scientific management guidelines, we have paved the way for utilization of non-science-based action to base similar hunter restriction or elimination efforts within both State and Federal wildlife management arenas.

Board of Game (BOG) decisions turning away from Dall sheep full curl management will lead to similar requests relative to moose management by antler restrictions.

If it is not broken, don’t fix it. Do not open Pandora’s Box of curses. Full curl management and antler restrictions work.

Elimination of allocation without proven science and ignoring proven science to take away livelihoods generates unneeded disrespect for the BOG process. How can any professional guide service provider try to build viability and sustainability within a conservation based operating basis, not live in fear of BOG actions. This type of action generates unneeded disrespect for the

process.

BOG action taking away nonresident hunter allocation, will not affect the Dall's sheep population trend within Unit 19C.

ADF&G Department of Wildlife Conservation staff provided the BOG solid data that Dall sheep management by full curl guidelines works. The BOG chose to differ from known and proven science by eliminating nonresident allocation within Unit 19C.

Professional guides would have a few hunters according to viable opportunity, the dreams of their clients would be intact, local businesses would have continued to have revenue, resident hunters would have opportunity and all of us should have turned together to focus on initiatives that would actually help our wild sheep.

The Alaska Board of Game and Big Game Commercial Services Board have a liaison position which was developed for situations that need addressed by both entities. That position should be encouraged to bring

concerns relative to conservation trends for distribution to professional service providers who operate within the regions and species of concern. This position was designed to help buffer conservation and allocation concerns and should be encouraged.

Respectfully Submitted

PROPOSED BY: Taiga Resources Conservation (EG-F23-310)

PROPOSAL 80

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen sheep hunting in Unit 19C to nonresidents as follows:

What solution do you recommend?

Reauthorize nonresident Dall sheep hunting in Unit 19C as follows:

5 AAC 85.055. Unit 19C Sheep

Nonresident hunters. One ram with full curl horn or larger every four regulatory years.
Harvest ticket. **August 10 - September 20** [No open season]

What is the issue you would like the board to address and why? Reauthorize nonresident Dall sheep hunting in Unit 19C.

Dall sheep populations have a cyclical pattern observed since the 1920s when record keeping began.

I quote, from Alaska Department of Fish and Game (ADF&G) website, "Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result

of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.”

The cyclical pattern has been documented in the 2022 Board of Game (BOG) Dall Sheep Informational Meeting Presentation presented by ADF&G. In 1945, 1992 and 2022 displayed noticeable downturns in overall sheep populations. While an abundance of sheep were observed in 1930, 1968, 2003 and 2018. Primarily due to weather events.

The board adopted the full curl regulation in 1992. This is one of the most conservative approaches to Dall sheep management. Limiting harvest to full curl, eight plus year old rams, which are a small percentage of the overall sheep population has been proven to have no detrimental effects on population. Even compared to National Parks in Unit 19C where hunting is not allowed. Full curl regulation has been the standard management tool for 30 years protecting our sheep herds from overharvest while allowing all users opportunity to hunt.

Department studies show once a ram is more than eight years, chances of survival are much lower. Very few rams survive beyond 12 years. Full curl, eight plus year old rams' constitute less than 5% of the total sheep population. The harvesting these older rams eight years + has shown no negative impacts on sheep populations. Taking older rams out of the herd gives the younger sheep less risk of injury during the rutting season and less grazing competition. Resulting in better chance of breeding age rams surviving a difficult winter.

Unit 19C recently has seen a large decline in hunter participation

During the 2018 season, Unit19C saw a record number of 212 hunters. The following five years saw a steady decline with the 2022 season having 81 hunters go to the field. In a 5-year period there was a 62% decline in sheep hunters. Hunters tend to self-regulate as game populations cycle leading to fewer hunters. ADF&G records of hunter participation show when game populations are low, fewer hunters hunt that area. Dall sheep hunter participation in Unit 19C represents these trends. The sheep population declined, success rates were lower, sheep hunters moved to other areas. ADF&G website indicates other units with sheep populations have increased in hunter participation since 2018. In Unit 19C the five year period leading up to 2018 there was an increase in Dall sheep hunters due to good numbers of sheep and above historical success rates. These trends show hunter participation follows the cyclic nature of Dall sheep populations. An ADF&G estimated 40 harvestable rams in Unit19C for the 2022 season, 27 residents participated in the hunt. By closing the nonresident season the Board of Game went against ADF&G opposing the proposal to close the season for five years. This shuts out an entire user group. Following the data this will move sheep hunters to other areas of the state while there is an opportunity for harvestable rams in Unit 19C.

If nothing is changed:

Other units will see a noticeable increase in Dall sheep hunter participation many of which are showing the same decline due to winter events as Unit 19C. From guided nonresident hunters, second degree of kindred hunters and youth hunters. Thus, creating more pressure on the Dall sheep resource in those units. Creating additional competition amongst user groups in these areas. All while harvestable mature rams will be available the to hunt is lost for three (**yes 3**) user groups.

Alaska businesses that are related to nonresident sheep hunting will suffer:

1. Loss of revenue
2. Loss of jobs
3. Loss of license monies and associated Pittman-Robertson match funds
4. Land use permit monies
5. Potential business closures by commercial operators

All from an adopted proposal unsupported by our professional biologists at the Alaska Department of Fish and Game.

PROPOSED BY: Jeff Pralle

(EG-F23-275)

PROPOSAL 81

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reestablish seasons and bag limits for sheep hunting in Unit 19C as follows:

I don't have access to the new language passed by the board in March. My ideal suggestion would be for two members of the board call a meeting to delay implementation of this action for one year pending better data. Failing that, the seasons and bag limits for Unit 19C should be reestablished for the 2024 season.

END NOTE: The practice of board-generated or board amended proposals is not clearly permitted in Alaska Statute or regulations. Just where the idea arose is uncertain, but it seems to have come along when former ADF&G biologists (who were accustomed to being managers) began to serve on the Board of Game.

Complicating the issue is the underlying confusion between “management” and “allocation.” management has to comply with the Alaska Constitution and statutes. However, “management” can be effectively altered or truncated by regulation. There is little safeguard against this eventuality. If the Board of Game cannot tease this confusion out satisfactorily with the actual manager of record, the Commissioner’s Office/department, it would be rational for the legislature to provide more direct guidance. That process is presently being debated for the “Area M” commercial fishery via HB 128.

When the Board of Game makes its own proposal for regulatory change where the manager has not been substantively involved, then subsequently amends the proposal in deliberation (with no

opportunity for public comment), and the final board vote is apparently swayed by emotional appeal. The optics (whether procedurally allowable or not) are not good.

What is the issue you would like the board to address and why? The recent board action banning nonresident Dall ram hunting in Unit 19C should be rescinded or delayed. I offer two lines of thinking for this suggestion. One is biology and management related. The other is procedural.

BIOLOGY AND MANAGEMENT:

1. Dall sheep populations have waxed and waned with variations in environmental resistance for thousands of years. Although Dall sheep populations are currently down compared to the highs of the last several decades (most likely due to weather), there is no evidence suggesting the light past harvests of mature rams are linked in any way to today's declines. Consequently, there is no rationale for assuming an adjustment in Dall ram harvest opportunity is necessary as a matter of Dall sheep conservation or would be likely to speed population recovery at this time.
2. This means any change in harvest opportunities at this time would be inconsistent with the known biology and management history for Dall sheep.
3. Consequently, any change in harvest opportunity would have to be for reasons other than biological conservation. That is, any change would be arbitrary.
4. The arbitrary nature board action banning nonresidents from Dall ram harvest opportunity leads to questions about procedure.

PROCEDURAL ISSUES (THE SEQUENCE OF EVENTS)

1. The apparent declines in Dall sheep populations have lead to the *intuitive assumption* that the light and sustainable mature ram harvests contributed to population declines, and if continued will delay population recovery.
2. Sufficient concern over these *intuitive assumptions* was expressed to the Board of Game that it requested an informational meeting with Alaska's Dall sheep biologists and managers about the status of Dall sheep research and management last October.
 - a. It is significant that these concerns were solicited by the Board of Game rather than volunteered by the manager of record, the Commissioner's Office through the Department of Fish and Game. According to the established statutes, the Commissioner's Office is the manager. It is not known why the department did not bring concerns about sheep populations to the Board of Game.
3. When the Board of Game became concerned, the board inquired of the department about whether (or not) there was conservation concern requiring regulatory action. This department reported to the board on October 19, 2022.
4. At that time, the department gave an excellent three hour presentation to the Board of Game. The gist of the data presented was that ram hunting had little to nothing to do with the population declines. The coinciding changes in weather severity of recent years have apparently resulted in the population declines due to poor lamb production and recruitment.

5. The obvious recommendation that flowed from the available data presented to the board was that there was no immediate need for harvest opportunity adjustment at this time.
6. Despite this strong presentation by the department, a senior board member immediately announced he would be bringing forth a board Agenda Change Request (ACR) to allow consideration of a board-generated proposal for total Dall sheep harvest closure for all Alaska residents (including recognized subsistence users) as well as nonresident hunters in Unit 19C.
7. This ACR was considered by the board, and passed by a 6-1 vote. Subsequently, a board-generated proposal was drafted.
 - a. At this time, the total input from the “generating board” is unknown. Whether the whole board, a select committee, or just the senior member participated in drafting the board-generated proposal is unknown. It appears the managers (the department) were not asked for, nor did they provide any input.
8. Subsequently, the board met in mid March to consider the board-generated proposal to close all Dall sheep in Unit 19C for five years.
9. Reports from the board meeting in March were that the proposal to curtail all Dall sheep hunting opportunity in Unit 19C for five years was unlikely to pass.
 - a. A similar ACR by the Resident Hunters of Alaska (RHAK) to eliminate non-resident hunting had been denied by the board in the interim.
 - i. Eventually the board would ban nonresident hunting as RHAK had suggested, but via differing methodology in spite of the fact that the board had denied RHAK’s request for an ACR to deal with the alleged crisis presented as a result of non-resident hunting in Unit 19C.
10. In an apparent effort to garner more board support (votes) for the (his or the Board’s?) board-generated proposal, the sponsoring board member moved to amend the proposal to simply ban nonresident hunting.
 - a. Whether strategically planned or not, this amendment would have left the biologically more risky (because it allowed a lengthy season and bag limit of multiple sheep, including ewes—but biologically inconsequential because of limited participation) subsistence hunt in place.
11. The board approved the amendment, and moved to consider the amended proposal.
 12. During deliberation, it looked like the board-generated and subsequently board-amended proposal was unlikely to pass.
 13. The sponsoring board member then offered an emotional argument sufficient to persuade enough board members to pass the board-generated and board-amended proposal by a one vote margin.
 - a. It is reported that the emotionally-charged appeal by the senior Board member persuaded two members to change their votes.
 14. As things stand at present, nonresident participation in mature Dall ram harvesting is

scheduled for prohibition in Unit 19C, but unlimited resident hunting for mature Dall rams and the biologically riskier subsistence hunt. are still allowed by regulation.

PROCEDURAL COMPLICATIONS:

1. The board, which according AS 16.05.221 (b) was created for,

“ . . . the conservation and development of the game resources of the state” appears to have, by the use of this Board-generated and amended proposal, assumed management authority that properly resides in the Commissioner’s Office.

a. Alaska law (**AS 16. ARTICLE 1. Sec. 16.05.010.**

Commissioner of the Department of Fish and Game (THE DEPARTMENT OF FISH AND GAME) says “The commissioner is the principle executive officer of the Department of Fish and Game.”

2. **Sec. 16.05.020 . Functions of the commissioner.** says, “The commissioner shall (2) manage, protect, maintain, improve, and extend the . . . game resources of the state in the interest of the economy and general well-being of the state.”

a. By eliminating non-resident mature Dall ram hunting, the board has arbitrarily usurped the Commissioner’s obligation and authority to manage in the best interests of Alaska’s economy.

1. Nonresident hunting in Unit 19C is certainly going to generate less revenue than when mature Dall rams were more abundant, but the economic contribution from non-resident Dall ram hunters to both the private economic and ADF&G funding sectors is nonetheless significant. In license and tag fees alone, non-residents provide about twenty times more management revenue than residents in Unit 19C. Additionally, the economy of the private sector benefits substantially from cash spent on nonresident hunting apart from license and tag fees.

2. In eliminating participation by nonresident hunters, the Board seems likely to violate the POLICY Section of Alaska Constitution Article VIII. Sec. 1 POLICY. This section says, “It is the policy of the

State to encourage . . . development of its resources by making them available for maximum use consistent with the public interest.”

a. Unit 19C has always been a major non-resident use area because the logistics involved in hunting there are complicated and more costly than most residents are willing to pay. Consequently, excluding nonresident participation is highly unlikely to make the harvestable rams available in Unit 19C for “maximum use consistent with the public interest.” It is doubtful, given the circumstances of lower ram abundance and consistently challenging logistics that residents will take the maximum allowable harvest of rams. Nonresident participation, will not harm the population, and there is no evidence that banning nonresident hunters will hasten population recovery.

b. It seems unlikely that resident hunters (particularly in light of diminished resources) will flock to Unit 19C to “replace all non-resident use for mature Dall ram hunting.’ If so, this will result in practical submaximal use, and be out of step with constitutional policy.

3. Alaska Constitution Article VIII. Sec. 4. Sustained Yield. says:

“ . . . replenishable resources . . . shall be utilized, developed, and maintained on the sustained yield principle subject to preferences among beneficial uses.”

a. If use isn't maximized, sustainable yield will be hard to realize, and maximal use via open hunting opportunity will not be offered either. Unless resident hunters gravitate to a challenging, non-resident- free, logistically challenging, and expensive locale in Unit 19C (where harvest of mature Dall rams has been historically light) the sustainable yield will not be recognized or even provided for.

PROPOSED BY: Wayne Heimer (EG-F23-266)

PROPOSAL 82

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change nonresident sheep hunting in Unit 19C as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; up to 10 permits may be issued Aug 10 – Sept 20
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Alternatively, the board could use a percentage of the estimated harvestable surplus of legal rams to allocate draw permits to nonresidents, as follows:

**Unit 19C
Nonresident Hunters**

One ram with full curl horn or larger by drawing permit only, every four regulatory years; the number of permits issued may be up to 25 percent of the estimated harvestable surplus of sheep. Aug 10 – Sept 20
[ONE RAM WITH FULL CURL HORN
OR LARGER, EVERY FOUR REGULATORY YEARS]

Note: The Department states that there is currently a harvestable surplus of 30 legal rams in Unit 19C.

What is the issue you would like the board to address and why? Since our formation in 2016, Resident Hunters of Alaska (RHAK) has been submitting proposals (all voted down) to limit nonresident sheep hunters in Unit 19C, based on sheep conservation concerns and fears residents would lose general sheep hunting opportunities if nonresidents were not limited. For over a

decade, unlimited nonresident sheep hunters have taken nearly 80 percent of the annual ram harvest in Unit 19C. In RY 2020, the department closed the winter subsistence sheep hunt based on biological concerns for the sheep population, but the board did not act as required to place any restrictions on the general hunt. The sheep population continued to decline and in 2022 nonresident sheep hunters took 90 percent of the harvest of a significantly reduced sheep population.

Our concerns and fears were realized when the board, after years of implying that unlimited sheep hunting opportunity under full-curl harvest management was sustainable, submitted their own board-generated Proposal 204 out of cycle for the 2023 Region II (Southcentral) meeting to completely close all sheep hunting in Unit 19C for five years for everyone, based on conservation concerns for the sheep population.

Proposal 204 was amended to close Unit 19C sheep hunting only for nonresidents for five years and passed by a 4-3 vote.

RHAK has never sought to eliminate nonresident sheep hunters, and had the board taken action in previous years to limit nonresident sheep hunters, this complete nonresident sheep hunting closure in Unit 19C would not have been necessary and would not had such an impact on guides and their clients who already had hunts booked, as well as impacts to department revenues from the loss of income from the sale of nonresident hunting licenses and sheep tags.

This proposal is being drafted after the board decision in March of 2023 to close Unit 19C to all nonresident sheep hunting for five years, recognizing that there will likely be proposals submitted for the Region III (Interior and Eastern Arctic) meeting in 2024 to open the nonresident sheep hunt earlier.

We could support a nonresident opening prior to 2028 if nonresident sheep hunters were put on a draw permit system now with a limited allocation of permits.

PROPOSED BY: Resident Hunters of Alaska (HQ-F23-015)

PROPOSAL 83

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only, as follows:

Reinstate nonresident Dall sheep hunting in Unit 19 but by bow and arrow only as follows:

Unit 19

Nonresidents

BAG LIMIT: ONE RAM WITH FULL-CURL HORN OR LARGER EVERY 4 REGULATORY YEARS BY BOW AND ARROW ONLY

SEASON DATES: AUG 10 - SEPT 20

[No open season]

What is the issue you would like the board to address and why? I believe a solution to continue nonresident sheep hunting opportunity while also reducing the take would be to allow hunting by bow and arrow only. The Board of Game recently closed sheep hunting to nonresidents in Unit 19 due to perceived ideas of hunter impact by locals. The department evidence did not support that nonresident sheep hunters who were limited to one full curl ram every four years, were the reason for sheep population decline in Unit 19. The department cited that weather was the driving factor in the sheep decline. I feel that taking away hunting opportunity in this case is not solving anything and is also potentially hurting outfitters in the area for no good reason.

Bringing back the nonresident season, but limiting the take to bow and arrow only would accomplish three things. First, it would bring back the opportunity to pursue mature rams and allow guides to continue offering sheep hunts. Second, the take would be extremely minimal due to the challenges of hunting sheep with archery equipment, therefore accomplishing the original goal of limiting harvest numbers. Third, this would be a great opportunity to build a record and data of how bowhunting can be used as a valuable management tool that can save hunting opportunities while at the same time not making a negative impact on game populations.

This data could also be used to revisit this topic in the next Board of Game cycle for this area.

PROPOSED BY: Mike Harris (EG-F23-299)

PROPOSAL 84

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years as follows:

One full-curl or larger ram every two regulatory years for residents. Nonresidents are already at one legal ram every four regulatory years. This places a higher priority on shooting mature aged rams and lessens the chance of a sub legal ram taken by mistake. Rams “close” to legal will be passed over and saved for the next season when they are obviously of age and legal hence giving them at least one more season of mating to help the population.

What is the issue you would like the board to address and why? The harvesting of sublegal rams. While the bulk of the sheep population issue is weather and predator related. An issue that we can help is the taking of sub legal rams. 8 year old, full curl or double broken rams are the statewide professional biologist standard of management. To put more of an emphasis on this and leaving breeding age rams in the population longer therefor putting more sheep on the mountain in the long term. Taking of sub legal or immature rams needs to be placed in a higher priority.

PROPOSAL 85

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams, as follows:

Resident hunters in Unit 19C:

Harvest of a ram 8-year-old or older and hunter will be eligible to hunt sheep the next season. Harvest a 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a 6-year-old or younger ram, and the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full-Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska’s sheep population has been noted to be on a steady decline and it’s time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

Because of this decrease the Board of Game (BOG) adopted Proposal 204 during the 2022/2023 meeting cycle which imposes a five year moratorium on nonresident hunters in this area. This is a step in the right direction but our biologists are telling us that due to climate change, the conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines, which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a fiveyear-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Full-Curl Management regulation. Shooting a full curl seven- year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C. I am open to this being adopted region or statewide but have targeted it here to Unit 19C due to recent concerns. Unit 12 would also be a good place to introduce this regulation.

PROPOSED BY: Paul Forward (EG-F23-285)

PROPOSAL 86

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams, as follows:

***This is a more conservative version of the other proposal with more conservative age requirements. This is consistent with some of the theories on ram viability put forth by multiple wildlife biologists from Alaska and British Columbia.

Resident hunters in Unit 19C:

Harvest of a ram 10-years-old or older and hunter will be able to sheep hunt again in Alaska the next season.

Harvest of a full-curl or carger ram 8 or 9-year-old, the hunter will be ineligible to hunt sheep for next one season.

Harvest a full-curl or larger but 7-year-old ram, the hunter will be ineligible to hunt sheep for the next two seasons.

Harvest a full-curl or larger but 6-year-old or younger ram, the hunter will be ineligible to hunt sheep for the next three seasons.

***If nonresident hunting is allowed to resume after the five year moratorium, a similar stratification system could be used to encourage local hunting guides to adopt a similar strategy.

What is the issue you would like the board to address and why? In recent years there has been widespread concern raised about the harvesting of young rams during Full Curl Management (FCM) sheep hunts throughout Alaska. During the emergency meeting last October and during my multiple conversations with sheep biologists both in Alaska and British Columbia, consistent concerns have been raised that harvesting younger rams has an adverse affect on the sheep population. Alaska’s sheep population has been noted to be on a steady decline and it’s time for hunter/conservationists to take some responsibility to do everything possible to conserve sheep.

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conditions that have led to this sheep decline will not be changing in a meaningful way. Unlike previous sheep declines which bounced back after a decade or two, this decline is very likely only the beginning of an essentially irreversible trend. It is up to us to find ways to conserve the sheep population with a focus on long term, sustainable practices.

Because of this we need to look at other creative options to maintain our sheep population. One area of improvement could be to focus more on harvesting older rams. Unfortunately, in recent years there is a concerning trend toward younger rams being killed. In Unit 19C the average age of rams killed was under eight-years-old and if a few old outliers are removed from the approximately 50 or so rams killed when calculating, the average age of a sheep killed is under 7.5 with a concerning number of six and even a five-year-old ram having been killed. (In Unit 12 recent harvest statistics show an average age of around 7.2 years old in 2022.) This suggests that a large number of the total mature ram population is being killed, potentially leaving a much smaller potential breeding population.

Of note, this regulation does not change Management regulation. Shooting a full-curl seven-year-old ram, for example, will not be illegal but will only result in some suspended hunting privileges. This is akin to some of the laws proposed and adopted in some places for shooting nannies instead of billy mountain goats.

To this end I am proposing a strategy to encourage the harvest of older rams in Unit 19C.

PROPOSED BY: Paul Forward (EG-F23-287)

PROPOSAL 87

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C as follows:

Unit 19C Resident Dall Sheep General Season: August 15th - September 10th.

Nonresident Dall Sheep Season: August 21st - September 10th.

Youth Hunt Season: None

Subsistence Hunt Season: no recommendations

Bag limit for resident or nonresident: Same as current - one ram that is 8-years-old, broken on both sides, or full-curl or passes the angle or stick test on at least one side.

Methods and Means: General harvest methods.

What is the issue you would like the board to address and why? The Board of Game (BOG) had legitimate conservation concerns about Dall sheep populations in Unit 19C and submitted a board generated proposal for the Southcentral Region Meeting in Soldotna in March of 2023. It would've impacted all user groups equally by closing the season for five years for everyone.

They ended up amending the original proposal and passing one that was mostly if not entirely allocative, by closing in entirely to nonresidents and leaving the entire resident season - except for the youth hunt, in place. This caused serious financial losses to many, including the state of Alaska Department of Fish and Game.

PROPOSED BY: Wayne Kubat

(EG-F23-322)

PROPOSAL 88

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change all sheep hunting in Unit 19C to archery only, and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only as follows:

This proposal would transition all sheep hunting in Unit 19C to **by bow and arrow only**.

Resident: One ram with full-curl horn or larger **by bow and arrow only**.

Nonresident (when/if moratorium ends): One ram with full-curl horn or larger every four regulatory years **by bow and arrow only**.

What is the issue you would like the board to address and why? The purpose of this proposal is to maintain hunting opportunity for resident and nonresident hunters (when/if the moratorium is removed) while decreasing harvest in the Unit 19C sheep population that has felt a dramatic population decrease in recent years. The goal of this proposal is to transition Unit 19C general season sheep hunting to archery only.

Justification:

As our state sheep population continues to decline or remains low, archery can be a very valuable management tool that will maintain opportunity while reducing harvest impact.

During the 2022/2023 Board of Game meeting in Soldotna, a five year moratorium on nonresident hunters (Proposal 204) was passed because of significant concern that the sheep population was decreasing beyond sustainable limits despite Full Curl Management (FCM). While this five year moratorium will likely substantially decrease harvest, it will also decrease opportunity for nonresident hunters. Going forward, an alternative would be to change Unit 19C to archery only. This will likely have an even more dramatic effect on sheep harvest (archery hunt success rates for sheep are generally much lower). This will have zero adverse affect on opportunity because anyone who wants to hunt sheep in that area, including nonresidents will still be able to hunt. They will just have to use a bow instead of a rifle.

Of note, the success rate for nonresident hunting in these areas has been as high as 80% over the past five years and is consistently over 40% for resident hunters. These are extremely high success rates, higher than those for many other species in many parts of the state. Transitioning this area to archery hunting would allow for true fair chase hunting with decreased success rates but will maintain opportunity for *anyone* who wants to hunt it (they would just use a bow now). Skilled hunters who know how to pursue and stalk sheep will still kill rams but the overall take will be

reduced due the increased difficulty.

***Regarding opportunity: in the past there has been some resistance to transitioning existing rifle hunts into archery hunts because of the perception of some that this somehow decreases opportunity. It is, however, well established throughout the United States and in Alaska that all hunters are capable of taking advantage of archery hunts by the simple means of purchasing and learning to shoot a bow. Those who wish to sheep hunt in Unit 19C who are not already among the thousands of Alaskans who enjoy bowhunting, can easily obtain equipment and proficiency. Currently it's possible to buy an effective hunting bow for less than the cost of most rifles and to learn to shoot accurately in a matter of weeks. This change will not adversely affect any hunters opportunity, it will just make the hunt a little more challenging and thereby decrease total harvest.

***Precedent: There are examples, both in and outside Alaska of the success of archery only sheep areas. In In Alaska, DS140/141 and DS240/241, which are bowhunting only draw hunts for any ram in an easily accessible area, the success rate over a ten-year period was about 2–3 rams per year for almost 70 tags awarded each year, and only a small fraction of the rams that were killed in these hunts would be considered legal in a full curl only area. Specifically, in the Eklutna area, where almost 70 hunters per year are allowed to bow hunt for any ram in an easily accessible area, there is still a steady population of mature rams despite all the hunting pressure. This is an example of how archery hunting allows for tremendous amounts of hunting opportunity with minimal impact on the animal population.

Similarly, there are very popular and well accepted hunts in Canada including the Canmore “Bow Zone” and the Todagin Mountain area of British Columbia. Both are over the counter archery sheep hunts that have proven popular with hunters and very affective in expanding hunter opportunity while having minimal harvest affect.

PROPOSED BY: Paul Forward (EG-F23-288)

PROPOSAL 89

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen the subsistence winter sheep hunts in Unit 19C as follows:

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct. 1-Apr. 30

What is the issue you would like the board to address and why?

Reinstate:

One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check

in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323

RS380

Oct. 1-Apr. 30

This hunt was closed at the last Board of Game meeting along with closing the nonresident season against the opposition by Alaska Department of Fish and Game to this proposal of a five year closure to all hunters due to lack of biological reason for a closure. Reopening this hunt will allow local residents without use of aircraft traditional harvest of sheep. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition.

PROPOSED BY: Jeff Pralle (EG-F23-278)

PROPOSAL 90

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C as follows: Reinstate RS380 Dall sheep hunt.

5 AAC 85.055 Unit 19C Sheep

Residents: One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning Sept 26; check in/out required due to small quota; aircraft prohibited. (no open season)

RS380

Oct 1-Apr 30

What is the issue you would like the board to address and why? Reauthorize RS380. One ram with 3/4 curl horn or smaller; excluding rams with both tips broken; by permit available online at <http://hunt.alaska.gov>, or in person in McGrath and Nikolai beginning September 26; check in/out required due to small quota; aircraft prohibited. Contact McGrath at (907) 524-3323.

The Alaska Department of Fish & Game advised the Board of Game in March of 2023 that there is no biological reason to close this hunt as well as the general season hunt for Dall sheep. Reopening this hunt will allow LOCAL residents to traditionally harvest sheep for subsistence needs. Historical use and harvest of RS380 is low with an average of two sheep taken a year. This is an important cultural hunt for the local hunters on the upper Kuskokwim to hunt without competition. The low harvest has no detrimental effects on the overall sheep population.

PROPOSED BY: Spencer Pape (EG-F23-300)

PROPOSAL 91

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan as follows:

Unit 19C Sheep Hunting

Guided nonresident bag limit- *management plan recommendation*
Non-guided nonresident bag limit- *management plan recommendation*
Resident bag limit- *management plan recommendation*
Subsistence hunt bag limit- *management plan recommendation*
Youth hunt bag limit- *management plan recommendation*

Guided nonresident season- *management plan recommendation*
Non-guided nonresident season- *management plan recommendation*
Resident season- *management plan recommendation*
Subsistence season- *management plan recommendation*
Youth hunt season- *management plan recommendation*

Sheep hunting Methods and Means-

Guided nonresident- *management plan recommendation*
Non-guided nonresident- *management plan recommendation*
Resident- *management plan recommendation*
Youth hunt- *management plan recommendation*

What is the issue you would like the board to address and why? This proposal is designed to provide a vehicle to address significant weather driven sheep declines in the western Alaska Range. In response to sheep declines the board has closed nonresident sheep hunting only for nonresidents for a period of five years. This closure is only allocative in nature and will not result in positive conservation outcomes for depleted sheep populations in the affected area.

The Alaska Professional Hunters Association (APHA) supports a more holistic and comprehensive approach to sheep management and conservation. The APHA is on record supporting the development of a western Alaska Range sheep management plan that could be limited to Unit 19C or expanded to other Unit subunits in the western Alaska Range. This proposal is designed to be a vehicle to be amended to incorporate the portions of such a plan that require Board of Game action.

PROPOSED BY: Alaska Professional Hunters Association (EG-F23-259)

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Close all nonresident sheep hunting in Unit 19 as follows:

Close all nonresident hunts for sheep in Unit 19.

What is the issue you would like the board to address and why? Declining numbers of legal rams in Unit 19. Over hunting plus harvesting of sub legal rams by guided nonresident hunters.

PROPOSED BY: Chris Bouch (EG-F23-171)

Note: Proposal 190 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2025.

PROPOSAL 190

5 AAC: 85.055. Hunting seasons and bag limits for Dall sheep.

We request a closure for 2025 to all general season hunts except the RS380 subsistence hunt.

In 2026/27 there will be a temporary draw hunt with a sunset clause after two years where 80% permits are allocated to residents and 20% to nonresidents, with a 5% cap for second degree kindred (2DK) nonresident hunters, coming out of the nonresident allocation. The 2DK hunt sponsor shall also notch harvest ticket for bag limit.

We request Unit 19C be used as the pilot program for the guide concession program, implemented by 2028.

In 2028, if the guide concession program for Unit 19C is in place, then residents and nonresidents will go to harvest ticket hunts.

What is the issue you would like the board to address and why? We remain concerned primarily about the health of the sheep population in Unit 19C. Please refer to the charge statement of the working group, the results of the working group meeting in October 2024, and the attached letter.

This approach prioritizes the well-being of the species over the distribution of hunting opportunities. The primary goal is to balance the interests of conservation, local communities, and economic factors.

These adjustments are about managing the resource sustainably rather than just allocating hunting rights.

The board deferred all proposals for sheep hunting in Unit 19C out of cycle to allow the sheep working group to submit a proposal which is timely with the other proposals.

The closure was a temporary measure put in place, and we are now in a position to create future hunting opportunities for multiple users. The Unit 19C sheep working group will not achieve our

mandate. In this time of uncertainty, we are trying to ensure the healthy sheep populations in Unit 19C.

October 21, 2024

To: Board of Game

To: Ryan Scott, Director of the Division of Wildlife Conservation, Alaska Fish and Game
From: Unit 19C Sheep Working Group

The Unit 19C Sheep Working Group members want to thank the Board of Game for creating the working group and giving it the opportunity to focus on understanding and addressing the key issues facing sheep in Game Management Unit 19C. Our group was comprised of nine individuals who collectively represented subsistence users, nonconsumptive users, guides, transporters, private landowners, and general Dall sheep hunters (see enclosed roster). During discussions regarding recommendations to be made to the Board of Game, including discussions regarding pending proposals and development of an Agenda Change Request, Board members Stosh Hoffman and Jake Fletcher did not participate. They reserved taking any action at the working group level in favor of fully participating as Board of Game members.

The group has worked hard through two facilitated two-day workshops (in June and most recently in October 2024) to be in a position to make recommendations. These recommendations are based on conservative management to ensure long-term sustainability of the Unit 19C Dall sheep population, sharing impacts among user groups, and exploring novel approaches to address declining sheep populations and increasing challenges between interest groups. Our recommendations are based on the best science (western and traditional knowledge) available, and we encourage the Alaska Department of Fish and Game to continue to learn about sheep populations, specifically adding radio collars to better understand mortality issues. Regarding any form of predator control, the sheep working group wants to assure positive results without causing unintended consequences, clear biological objectives that are measurable, humane control methods if used, clear efforts to gain public support, and most importantly to let science guide any steps regarding predator control. At this time, the sheep working group wishes to see the guidelines above followed and the research documenting mortality prior to any predator control for sheep.

The Unit 19C sheep working group made a specific proposal recommendation based upon a guide concessionaire program being in place. If this program isn't in place in time, the sheep working group would like to meet again in April 2026 to explore alternative possibilities. The sheep working group will do its best to be present with all members for the Board of Game discussions to be held in Anchorage in March 2025. To further assist the Board and implement the working group's mandate, the team went through the existing proposals submitted to the Board and wish to make the following recommendations. The sheep working group supports proposal 92 recommending hunter education. The group neither supports nor opposes proposals 93-101, 110, and 115-117. The sheep working group opposes proposals 102-109, 111-114 and 118 because these proposals are inconsistent with our proposal to the Board.

Once again, the Unit 19C Sheep Working Group expresses its gratitude to the Board for putting their faith into the working group to propose recommendations and better understand and address the key issues facing Dall sheep in Unit 19C. Most members of the working group support these recommendations.

Sincerely,

Unit 19C Dall Sheep Working Group

Enclosure: Unit 19C Working Group Membership Roster

Unit 19C Sheep Working Group Members

Jerry Burnett, Board of Game, Chair Stosh Hoffman, Board of Game Member Jake Fletcher, Board of Game Member

Scott Crowther, Anchorage Advisory Committee Brett Gibbens, McGrath Advisory Committee

Mike Litzen, Guide with Dall sheep hunting experience in Unit 19C Michelle Quillin, Fall season Dall sheep resident hunter

Chait Borade of CIRI, Unit 19C private landowner

Patricia Owen, Denali National Park & Preserve, non-hunting use of Unit 19C

PROPOSED BY: Unit 19C Sheep Working Group (HQ-F24-ACR5)

Note: Proposal 192 was accepted by the Board of Game as an Agenda Change Request for consideration at the Statewide Regulations meeting scheduled for March 2025.

PROPOSAL 192

5 AAC: 85.055. Hunting seasons and bag limits for Dall sheep.

Modify the resident and nonresident hunt structure for sheep in Unit 19C.

Resident sheep hunting opportunity in Unit 19C remains open under a general season.

Continued general resident sheep hunting opportunity August 10 – September 20 does not pose a conservation concern for sheep in Unit 19C at this time.

Nonresident sheep hunting in Unit 19C remains closed until such a time that a draw permit system is in place to limit nonresident sheep hunters.

The season then remains the same, August 10 – September 20. The board should set a conservative “up-to” number of permits and give the Department the authority to determine the number of permits allocated, with the intention that nonresident sheep hunters and their guides don’t overwhelm the area and continue to cause conflicts in the field.

Alternatively, if a Unit 19C Guide Concession Program to limit the number of guides and their sheep-hunting clients in the unit is implemented, nonresident sheep hunting can again

be allowed, but it should also be under a draw permit system with a limited allocation (*any nonresident draw permits would essentially go to the guided hunter booking with the guide with an exclusive concession*).

Should there come a time when the sheep population in Unit 19C further declines and it is determined that resident sheep hunters need to be limited under a draw permit system along with nonresidents, **the allocation of permits shall be a 90/10 split as in other areas where both resident and nonresident sheep hunters are on a draw permit system: 90 percent to residents, and 10 percent to nonresidents.** Nonresident second-degree-of-kindred (2DK) permits shall be placed in the nonresident pool of tags.

What is the issue you would like the board to address and why?

Unit 19C Sheep Conservation Concerns

Continued Unit 19C Resident General Sheep Hunting Opportunity

Unit 19C Nonresident Sheep Hunting Opportunity after the Closure Period

(Note: we apologize for the length of this section below, but it is important that newer board members have the facts as to past board actions that led to the point we are at now)

At the November 10, 2022, Agenda Change Request (ACR) meeting, the board took up ACR 12 submitted by Resident Hunters of Alaska (RHAK) that asked to consider limiting nonresident sheep hunters in Unit 19C out of cycle based on sheep conservation concerns.

The board voted unanimously to *not* accept RHAK ACR 12, saying it ***did not meet the criteria for acceptance because there were no conservation concerns for Dall sheep in Unit 19C.***

Minutes later, at the very same meeting, the board voted 6-1 to create a board-generated proposal that would close Unit 19C to all sheep hunting for five years, stating that ***there were valid conservation concerns for the sheep population.*** That proposal would become Proposal 204 to be heard out of cycle at the 2023 Southcentral meeting in Soldotna.

This overt manipulation of the public process – the board on one hand telling RHAK that our ACR did not meet the criteria for acceptance because there were no sheep conservation concerns, while on the other generating their own proposal based on sheep conservation concerns – should not have been allowed to happen and was carried out so that there would only be one out-of-cycle 19C sheep proposal (the board’s) before the board at the 2023 Southcentral meeting.

Board-generated Proposal 204 was deliberated at the 2023 Southcentral meeting. The board amended the proposal to exempt resident sheep hunters from the 19C closure. A resident closure or any new limits on resident sheep hunters was deemed not necessary. The proposal then passed to close Unit 19C to nonresident sheep hunters for five years.

There were a lot of questions and backlash after the board closed Unit 19C to nonresident sheep hunting. The board decided to create a new Sheep Working Group (SWG) that would focus solely on Unit 19C sheep management concerns and provide recommendations to the board at a future date.

The 19C SWG was formed in late 2023, with six public members and three board members. A facilitator was hired, and the group was to hold meetings in 2024.

2024 was also the year for the in-cycle Interior Region III board meeting, which includes Unit 19C. There were several public proposals before the board regarding Unit 19C sheep hunting, to include reversing the nonresident closure, as well as Proposal 82, from RHAK, asking to reopen Unit 19C sheep hunting for nonresidents, but limit nonresident sheep hunters in 19C to draw-only permits with a limited allocation.

All the 19C sheep proposals before the board at the 2024 Region III meeting were submitted on time by the May 1, 2023, deadline, nearly a year before the board would hear them. But the board deferred all the in-cycle 19C sheep proposals another year out to the 2025 Statewide meeting, stating that they did not want to make any decisions on Unit 19C sheep until after the SWG recommendations were submitted. They would take all the deferred proposals up along with the SWG recommendations at the same time.

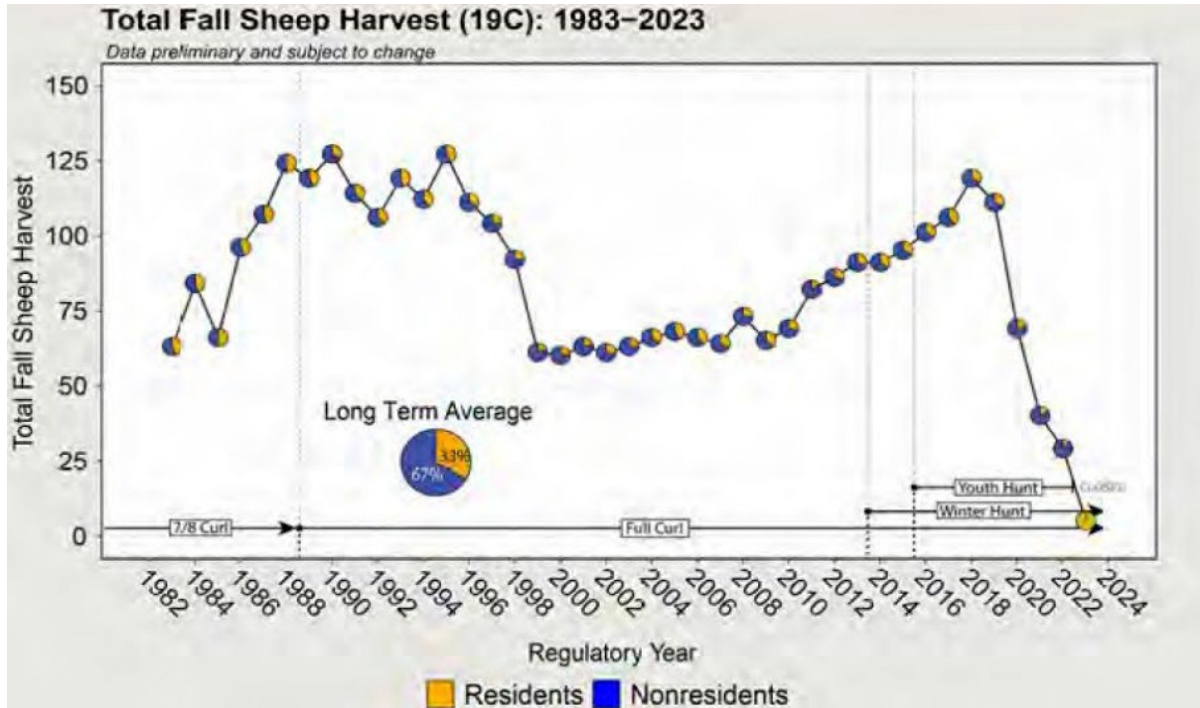
That action amounted to more circumvention of the public process and smacks of favoritism to the 19C SWG recommendations that can only come before the board via an ACR from the group, due by the November 1, 2024, deadline.

The 19C SWG met in mid-October 2024 to finalize recommendations to the board. Six members of the nine-member group supported an ACR asking the board to include resident sheep hunters in the 19C sheep hunting closure during the 2025 season, make all sheep hunting in Unit 19C during the 2026 and 2027 seasons draw-only hunts (with 80 percent of the permits going to residents and 20 percent to nonresidents), and if the Guide Concession Program to limit guides in 19C was not in place by 2028, then the SWG would meet again to discuss other recommendations.

Based on the information coming out of the 19C SWG, that they will submit an ACR that is in effect a new Unit 19C sheep management allocation plan, and the board's seeming willingness to accept it and hear it out-of-cycle at the 2025 Statewide meeting with all the deferred public proposals, RHAK is submitting this ACR to the board (that includes new data) for the same type of management allocation plan consideration.

The board has identified a conservation concern for Dall sheep in Unit 19C if continued unlimited nonresident sheep hunting is allowed and used that as justification for closing nonresident sheep hunting for five years (2023-2027).

In the ADF&G chart below, you can see that 19C sheep harvests started to drop dramatically in 2019, which correlated with the observed sheep population decline from the Department's aerial trend count surveys:



Nonresident sheep hunters have always taken the majority of the sheep harvest in Unit 19C, but as the ADF&G chart below shows, the percentage of nonresident sheep harvests increased dramatically as the sheep population declined:

Contemporary Trends (2013-2022)

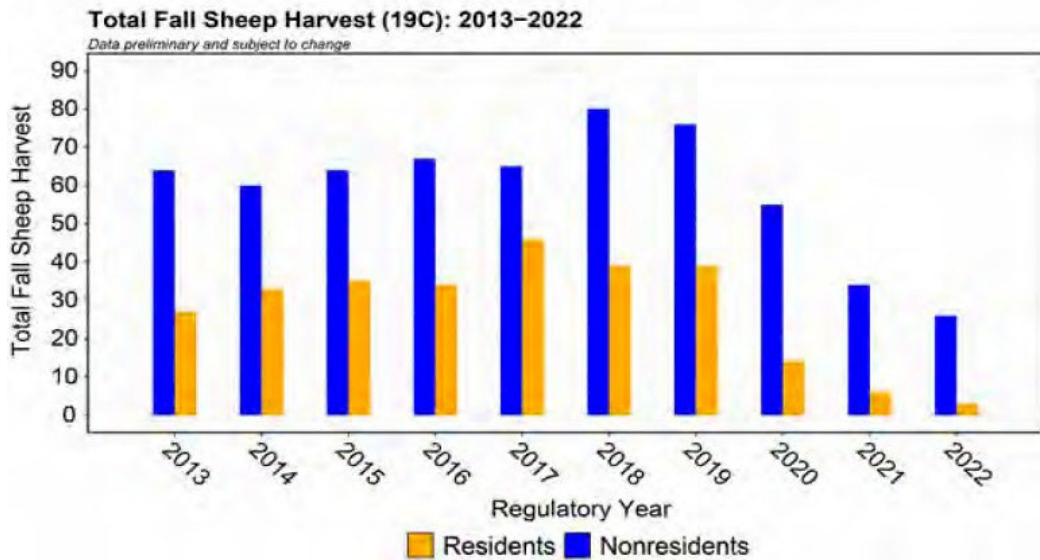


Figure 3. Total annual sheep harvested during the fall general season (GS000) from RY13 to RY22. Color indicates total fall resident (orange) and nonresident (blue) sheep harvested each year.

In 2022, the last year nonresident sheep hunting was allowed, nonresident sheep hunters took 26 sheep (90% of the harvest), while residents took three sheep.

The board decision to exempt resident sheep hunters from their own closure request at the 2023 Southcentral meeting was based on the rationale that resident sheep hunters were not a part of the problem. Clearly there was a harvestable surplus of rams in the unit for a general resident sheep season, while also maintaining the resident winter subsistence sheep hunt.

In the subsequent two seasons where only resident sheep hunting was allowed in Unit 19C, the resident participation and harvest was:

Year	Unit	Resident Hunters	Sheep Harvested
2023	19C	49	5
2024	19C	~40	10 (<i>preliminary ADF&G data</i>)

It is not expected that the number of resident hunters, or resident sheep harvests, will dramatically increase while the area is closed to nonresidents.

The 2024 aerial trend count survey below showed a bit of good news, with a higher number of total sheep from the previous year and higher lamb recruitment, but of course we don't know what mother nature will bring this winter, and we won't know until next year how many of those lambs made it through their first year.

ADF&G Chart

Table 1. Cumulative 19C Aerial Survey Data

	2010	2013	2014	2015	2016	2017	2019	2023	2024
Approx. Area (mi2)	453	453	453	453	453	453	453	453	453
Total Rams	348	268	374	301	255	343	202	98	101
Legal Rams	56	60	55	46	53	60	33	13	16
Sublegal Rams	292	208	319	255	202	283	169	85	89
"Ewes"	864	490	639	499	593	697	390	242	247
Lambs	287	94	168	167	195	266	178	73	120
Lambs:100 "Ewes"	33	19	26	33	33	38	46	30	49
Rams:100 "Ewes"	40	55	59	60	43	49	52	40	41
Legal Rams:100 "Ewes"	6	12	9	9	9	9	8	5	7
Sublegal Rams:100 "Ewes"	34	42	50	51	34	41	43	35	36
% Lambs	19	11	14	17	19	20	23	18	25
% Rams	23	31	32	31	24	26	26	24	21
% Legal Rams	4	7	5	5	5	5	4	3	3
% Sublegal Rams	19	24	27	26	19	22	22	21	19
Total Sheep	1499	852	1181	967	1043	1306	770	413	473

There is currently a harvestable surplus of sheep in Unit 19C for resident sheep hunters under a general season opportunity. But the board may be considering eliminating, or limiting, resident sheep hunting opportunity in Unit 19C out of cycle in 2025. There are currently no deferred Unit 19C proposals before the board that ask to eliminate resident sheep hunting opportunity.

The "Regular Cycle" public process has been circumvented by the board. On top of that, the newer 3-year cycle just makes this all worse in terms of making any needed changes between regional meetings.

The board has chosen to form a 19C Sheep Working group, decide the makeup of that group, and then take recommendations from that group regarding 19C sheep management and allocations via an ACR. Based on that, and even though resident sheep hunting in Unit 19C is currently allowed, we believe that resident sheep hunting opportunity may be limited or shut down altogether before the next Region III cycle.

This request is indeed allocative, in the sense that it wants to ensure resident sheep hunters in Unit 19C don't lose opportunity and asks to limit nonresident sheep hunters to draw-only permits. RHAK has conservation concerns for the 19C sheep population if unlimited nonresident sheep hunting is again allowed. But we don't believe continued resident general sheep hunting opportunity poses a sheep conservation concern. Resident sheep hunters do not need to be denied

opportunity, nor do they need to go on a draw permit system. We would like the board to consider our ACR in the same vein as they do the ACR from the 19C SWG, which is also allocative.

PROPOSED BY: Resident Hunters of Alaska (RHAK)

(HQ-F24-ACR9)
