
ALASKA BOARD OF GAME

Special meeting to form a board committee on Unit

19C Sheep and other business

Web Conference | July 20, 2023

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Submitted by: Spencer Pape

Organization Name:

Community of Residence: Wasilla, Alaska

Comment:

Dear BOG members,

With regards to forming a board committee with authority to form a working group for the purpose of making recommendations to the Board for future management of Dall sheep in Unit 19C. I believe the formation of this committee and group is a monumental first step in the conservation of Alaska's Dall sheep. I'm in full support of such and as a Registered guide with a private land hunting concession within 19C will be more than amicable to assist and participate in the rehabilitation of Alaska's Dall sheep populations through the BOG and committees.

Respectfully,

Spencer Pape



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

July 17, 2023

To: Alaska Board of Game

Re: July 20, 2023 non-regulatory meeting – Formation of a board committee with authority to form a working group for the purpose of making recommendations to the Board for future management of Dall sheep in Unit 19C.

Dear Chairman Burnett and members of the Board,

The board and the Department have already spent hundreds of thousands of dollars on a Sheep Working Group (SWG) and a sheep "survey" to define what the problems were that sheep hunters were experiencing in the field and make recommendations to the board for future management of Dall sheep in Unit 19C and other areas of the state *where the board allows unlimited nonresident sheep hunting opportunities.*

After all the money and time spent on the SWG and the Brinkman survey we came away with a consensus that the problems experienced by sheep hunters derived from too many nonresident sheep hunters and too many guides, and the best solution was to limit nonresident sheep hunters. The SWG also made a consensus statement that can be found in the meeting summaries: "**Residents should have a sheep hunting priority.**"

We believe that it would be a waste of time and money to form another sheep working group to come up with the same conclusions and recommendations as the former SWG and the Brinkman survey. We **oppose** the formation of another SWG.

The Department is ultimately responsible for sheep management and is best suited to offer any new recommendations as to how sheep should actually be managed in Unit 19C and elsewhere (absent allocations). Certain ideas being tossed out, such as increasing the minimum age requirement for a legal Dall sheep to 9 years old, or Full Curl, may be beneficial for the sheep and allow for more mature rams on the mountain. Perhaps the Department will decide that FC harvest management is not always sustainable under all conditions. These and other ideas and decisions are best left to the Department to determine if they have merit, and any recommendations then come in the form of proposals from the Department.

Again, another SWG is not necessary and would be a waste of time and money. And again, both the former SWG and the Brinkman survey have addressed what the problems are and the best solutions. As long as the board continues to refuse to move to draw-only hunts for nonresident sheep hunters in areas where maximum sheep hunting opportunity is allowed, we'll continue to see the same problems that



eventually lead to restrictive draw-only hunts for all or more closures. The board should focus on two things:

1. Sheep conservation
2. Ensuring residents continue to have general sheep hunting opportunities.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska (RHAK)



Submitted by: Karen Gordon

Organization Name:

Community of Residence: Fairbanks, AK

Comment:

To the Board of Game:

Please drop the notion of a working group for GMU 19C.

The Board continues to ignore the science repeatedly provided by the Department expressing there is no conservation concern in 19C and thus no working group is necessary. Indeed, every Alaskan sheep working group created so far has failed and done so miserably, even when using an otherwise successful international facilitator. To create a needless working group would be wasting precious dollars in an unwarranted extravagant expense.

The Board has fueled pursuit of the non-issue of 19C with unjustifiable and misplaced fervor. The Board of Game would be overreaching its authority by thinking to form a working group to deal with what some members of the Board have been duped into thinking is an emergency situation when the problem is not a biological issue at all, but really just an emotional runaway based on fear mongering fabrications.

The Board seems unwavering in its headlong descent into a political response rather than following the science. And in the process, the Board fails to stay in their own lane and is determined to usurp the Commissioner's authority to "manage."

The Alaska Statutes prohibit the Board of Game from embarking on administrative territory that falls under the purview of the Commissioner. Moreover, the Board has neither the legal nor the administrative authority to cause or involve itself in the creation of any management plan.

Here are reasons why the Board should NOT pursue a working group for a 19C management plan:

- 1) AS 16.05.020(2) defines the duties of the Commissioner, and his very first mandate is to "manage." The law clearly does not give any such authority to the Board. The Board would be overstepping its bounds by presuming to take on authority not granted it by the Legislature, and thus usurping the Commissioner's legitimate authority.
- 2) Management plans are administrative in nature and AS 16.05.241 forbids the Board to engage in administrative matters, thus the Board is violating statutes to presume to establish a working group for administrative and political purposes in the face of the Department already twice saying there is no conservation concern. Essentially, the Board is trying to fix something that isn't broken.
- 3) Moreover, a working group will embark on yet another Quixotic path to solving a problem that doesn't exist while wasting state dollars in the process. It will cost a hundred thousand dollars at least to support the waste of the people's money on a working group when the Board instead should be listening to its experts who have already told the Board that nothing needs to be done. Indeed, the Board has no spending authority and has no business seeking to resolve a political situation that isn't in its purview.

Sincerely,

Karen Gordon

Fairbanks



PC4

July 14, 2023

Alaska Board of Game

Public Comments to Non-Regulatory Special Meeting, Thursday, July 20, 2023

Members of the Board of Game:

My name is Michelle Heun. I own and operate High Lake Lodge, a small family business in Unit 13E. I am a licensed Transporter (GUIT1063).

I oppose the formation of a board committee to form a working group for the purpose of making recommendations to BOG for Dall sheep management in Unit 19C. The Board has the Advisory Committee and area biologists regular reporting. The formation of another board committee would add an additional layer of bureaucracy not needed for the conservation and development of AK wildlife resources. The Board made a decision; stand by your decision.

The BOG member assigned to the BGCSB should have knowledge of the civil end of industry. I trust the Board will select a member who can be relied upon and report accurately during this very transitional time.

My business is impacted by EO R4-1-23, of 6/30/23, closing Nelchina caribou hunts. I respect and anticipated this action. Again, the conservation and development of Alaska wildlife resources is vital to our state regarding both resident and non-resident hunters. I support a three year moratorium on all Caribou hunts in Unit 13, as the biologists have recorded low numbers in the most recent surveys.

Respectfully Submitted,

Michelle Heun
Owner/Operator
High Lake Lodge, Inc
GUIT1063
PO Box 1092
Palmer, AK 99645
(907) 745-2368



July 18, 2023

Kevin J Kehoe
President, Alaska Wild Sheep Foundation
13845 Mainsail Drive
Anchorage, AK 99516
kevinkehoe@alaskan.com

RE: Comments on behalf of the Alaska Wild Sheep Foundation on Special Meeting to form a committee on Unit 19C Sheep

Dear Alaska Board of Game:

The Alaska Wild Sheep Foundation (AK WSF) is a 501c (3) non-profit corporation based in Alaska with almost 800 members throughout Alaska. Our mission is to enhance wild sheep populations, promote scientific wildlife management, educate the public on wild sheep, and protect and enhance sheep hunting and viewing opportunities in Alaska. The AK WSF also functions as a chapter under our national parent organization, The Wild Sheep Foundation, which provides a significant corporate reach-back and resourcing capabilities. Over the years the Wild Sheep Foundation team has provided in excess of \$3M to the State of Alaska for wildlife conservation.

AK WSF is tentatively supportive of the Board of Game (BOG) forming a working group to develop a sheep management plan in game management unit (GMU) 19C as long as the primary focus of the plan is conservation and not allocation. With sheep numbers in a significant decline across the state we should be focused on determining if we are doing everything we can to facilitate and help guarantee a natural recovery of the resource before we focus on who gets to shoot the survivors.

GMU 19C encompasses a vast contiguous sheep range from Denali National Park extending southwest to the Lake Clark National Park boundary. This area is mostly accessible by airplane only, with limited overland and river access to sheep range from local communities, principally in winter time. This unit is diverse in the type and quality of sheep habitat with large glaciated areas balance by lower elevation "foothill" range. Many of these factors offer advantages from a scientific perspective however the remote setting makes management, even basic survey and inventory, costly. GMU 19C is mostly public state and federal lands being primarily state land where sheep occur. There is at least one large tract of private land owned by CIRI native corporation.

In principle GMU 19C should be a good starting point to determine a pro-active management strategy to form the basis of an action plan applicable throughout Alaska's sheep ranges. Dall sheep declines across the Alaska Range are well documented even as more data and survey results are expected later this year. Population declines of this magnitude have not occurred for some time and while concerning, represent an opportunity to advance our understand of Dall sheep and potentially enhance our management strategies.



The AK WSF mission fits hand in glove with a conservation driven approach to a sheep management plan. We have provided financial and other support to ADF&G on more than one occasion. If the conservation is taken by the BOG and ADFG as the primary focus of the plan, then AK WSF will look for ways to offer financial and other support both for the development of a management plan and assistance funding potential plan outcomes such as research, habitat improvement, and predator control as a couple of examples.

The AK WSF support is not contingent on our having a “seat at the table” in the working group. We fear that this would lead to all conservation NGOs in the state then demanding a seat. This would make the group unwieldy, unworkable, and much less likely to succeed in developing a plan of action. Rather, we would like to see a small group that is composed of reasonable representatives from entities that will be essential to putting the plan into place. State and federal land managers will need to be at the table, a BOG member or two, a couple members of the public and probably one or two other seats. We want to see the group supported by ADFG professionals who have experience developing successful management or research plans, probably both. This is to say the AKWSF trusts a professionally staffed group that is just large enough to be legitimate with both public employees and private persons mixed to ensure recommendation made are able to be put into place and are accepted as legitimate.

During the past decade ADFG has done a great job of allocating money to sheep research. This research includes mortality studies, habitat assessments and the beginning phase of understanding the impacts of climate change on all sheep. AK WSF is supportive of a planning process that takes a “deep dive” into all sheep ecology with the goal of understanding the cause of the decline, habitat limitations, research gaps and most importantly how we might rebuild sheep populations that decline like they have in GMU 19C. AK WSF understands the successful “full curl management” of hunting but we see hunting as likely not having any significant impacts at a population level. This is not to say that hunting has no impact on sheep populations but we have not data to support human take of full curl rams has any impact what so ever. AK WSF supports a comprehensive review a host to factors including but not limited to the impacts of hunting, natural predation, disease, changing weather patterns and habitat succession. The AK WSF see this decline as either an opportunity to understand how a sheep population recovers or a critical time to study sheep in the midst of a population free fall that may continue for some time.

In summary the AK WSF remains optimistic and ready to support any effort that focuses on Dall sheep conservation with the set goal of identifying ways to help recover sheep populations and advance our understanding of Dall sheep conservation. Conversely, AK WSF would not be interested in offering support for a management plan that solely focuses on human use, hunting and allocation.

Sincerely,

A handwritten signature in blue ink that reads "Kevin J Kehoe".

Kevin J Kehoe
President, Alaska Wild Sheep Foundation



Submitted by: Rod Arno

Organization Name: Alaska Outdoor Council

Community of Residence: Palmer, Alaska

Comment:

Re: Formation of a board committee to create a GMU19C Dall sheep “working group”.

The Alaska Outdoor Council (AOC); recommends that the BOG decline the request to form a board committee under AS16.05.310 to rehash data gathered by ADF&G regarding recent Dall sheep populations and habitat in GMU19C. Board of Game members have access to numerous current field studies on Dall sheep, habitat, predation, past weather anomalies, harvest, as well as an exhaustive study on hunters attitudes about Dall sheep hunters conducted by UAF.

All BOG members take an “Oath of Office” per Alaska State Constitution, Article XII, Sec.5 and AS 39.05.040 to support and defend the Constitution of the State of Alaska. The framework for the management and allocation of natural resources (Dall sheep) is clearly laid out in Article 8, Natural Resource of the Constitution of the State of Alaska;

Section 2. General Authority - The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and water, for the maximum benefit of the people.

Alaska State Constitutional authority for the Board of Game is not negotiable. Natural resources (Dall sheep) are to be utilized, developed and conserved for the maximum benefit of the people.

The Alaska State Legislature has enshrined numerous statutes in; Title 8. Businesses and Professions, Title 16. Fish and Game, Title 44. State Government, all consistent with Article 8. Natural Resource of the Alaska State Constitution,.

AS 16.05.221. Boards of fisheries and game. (b) For purposes of the conservation and development of the game resources of the state, there is created a board of game, composed of seven members appointed by the governor, subject to confirmation by a majority of the members of the legislature in joint session. The governor shall appoint each member on the basis of their interest in the public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view of providing diversity of interest and points of view in the membership.

AOC recommends that BOG members acquaint themselves with current state laws regarding allocating game harvest before deliberating on Dall sheep proposals in GMU19C at the Interior Region meeting March 2024. The allocation criteria for fish in AS 16.05.251 has been approved by the Alaska Supreme Court and surely would be applicable the game.

Alaska Board of Game letter to FSB regarding closer to all Nelchina caribou hunts on federal lands.

AOC supports such a letter as a notice to the FSB that if they don’t close the Nelchina caribou hunt on federal lands during the 23/24 fall/winter season the Alaska Board of Game will withdraw their signatures from the MOU between the State of Alaska and Federal Agencies on the coordinated management of subsistence uses of fish and wildlife resources on federal public lands.



Submitted by: Thor Stacey

Organization Name: Alaska Professional Hunters Association

Community of Residence: Juneau, AK

Comment:

Dear Board of Game Members,

The Alaska Professional Hunters Association (APHA) submitted comments for the March, 2023 meeting supporting the development of a sheep management plan in lieu of taking action on the board generated proposal to close all hunting in the unit. Unfortunately the board reallocated the resource by closing all nonresident hunting for a period of five years while resident hunting opportunities remain open as before. This action will reduce human harvest in the near term but may drive resident interest in the unit in the long run. This action was especially problematic because div. of wildlife staff testified that declining sheep numbers in 19C are attributed to weather events, no human harvest. Furthermore, data does not exist that demonstrates harvest of full curl rams has population level impacts on dall sheep. As a board you made a purely allocative decision without defining a conservation or management outcome. The APHA's members who guide in the unit were singled out with a total closure not justified by an scientific evidence presented at the meeting by professional staff on any level.

Instituting a total nonresident sheep hunting closure in 19C has thrown management and allocation of all sheep hunting opportunities into chaos. If your decision will be a precedent for how you allocate hunting opportunities in other units with sheep declines we expect small, sustainable, Alaskan owned guide businesses will be eliminated or made much less viable across the state. You action combined with the Federal Subsistence Board's action to close portions of the S. side of the Brooks Range effectively rejects full curl management of all sheep in Alaska and yet there is no scientific basis, not even a smidgen, for this new direction being taken by state and federal allocative boards. Work needs to be done to with professional staff to affirm, reject or modify full curl management of dall sheep hunting in Alaska or future board decisions will follow the 19C precedent by reducing hunting opportunities without defined conservation objectives.

As board you could have moved slowly, gathered more data and worked with staff to develop a plan for 19C. The APHA strongly supports the development of a 19C sheep management plan that prioritizes conservation of dall sheep first. As guides we want to help were we can by sharing knowledge gained over decades of hunting in the unit and potentially in efforts to rebuild, survey or monitor sheep populations in 19C. The fact is sheep numbers have cratered in the area and the weather may not get better in the future. The sheep are the priority, they must come first. The APHA is frustrated by the board's action but looking forward we are asking that you roll up your sleeves and work with the department to set some population objectives that hopefully involve sheep efforts to recover sheep numbers. Looking back is not constructive, looking forward requires pulling together to develop a plan.



Comment Received 7/18/2023

I encourage the Board of Game to resist the inclination to form “. . . a board committee with authority to form a working group for the purpose of making recommendations to the Board for future management of Dall sheep in Unit 19C.” (from news release about upcoming special meeting). Here are my reasons:

1. The Board of Game (the regulator) should not purpose to drive management (which is the function of the manager).
2. According to Alaska Statute, **Section 16.05.241 Powers excluded**, the Board of Game is specifically does “. . .not have administrative, budgeting or financial powers Art 3 ch 206 SLA 1975).”

My commentary: The ultimate goal here seems to be for the Board to drive a new Dall sheep management plan specifically for GMU 19C. I argue this is an administrative function, which is among the “**Powers excluded**” from the Board of Game. This is my position because of my past experience (dating from 1974) in drafting and reviewing management plans both within and external to the Department of Fish and Game. Based on this experience, I argue nothing could be more “administrative” than planning a response to an unexpected future one cannot control. Today’s statewide Dall sheep status shows we can’t control the weather effects on Alaska’s game populations. In the case of Dall sheep, the chances that lowering or redistributing harvests of full curl rams (by, for, or to anyone) will hasten population recovery are almost unthinkably remote. Any management action, short of total predator control probably won’t make any difference to Dall sheep populations recovery in GMU 19C.

I argue that management planning is an administrative activity that is beyond the purview of the Board. Certainly, management plans involving seasons and bag limits require passing regulations. Management *per se*, via its administrative function (for which management plans provide guidance) is not a Board function. “Management” is the responsibility of the “manager,” the Commissioner of Fish and Game and, by extension, a function of the Department. If the ‘manager’ needs regulations to implement a plan the Commissioner’s Office has approved, it may come to the Board of Game. I can find no language that involves the Board in the administration of management. Deviation from this pattern of Constitutional and Statutory process is not something I can not rationalize.

Also, making management plans (particularly as they have evolved to the present) is an expensive activity. Read simply, AS 16.05.241 says the Board simply can’t spend or budget money for any purpose.

Now, if the Board of Game is excluded from budgeting and financial powers, who is to pay for the management plan the Board hopes to establish for GMU 19C? I’ve heard the Wild Sheep Foundation (WSF) may be a funding source. While I am intimately familiar with the altruistic philosophy of the WSF, I must realize it is a special interest (not necessarily selfish or evil—just special). It is just another among the spectrum of special interests in Alaska’s Dall sheep resource. Does Alaska want a special interest, no matter how altruistic, to pay for management planning?

Some history about past working groups: Going back to investigating the relevance of the “Who’s gonna pay?” question it occurred to me from past experience with Board-orchestrated working groups, that the legal opinion that came from the last working group was that the Board could not create its own management plans.

At that time we were all told that both the expenditure of funds, and the writing of management plans were among the “Powers excluded” from the Board. Hence, the Wildlife Director of the day (as I recall from meeting with him) chose not to risk spending PR money on ‘planning’ (an arguable violation of PR fund expenditure restraints). Consequently the cash the Wildlife Director had budgeted required “re-purposing to get around exactly what the stated intention of today’s Board is. There was uncertainty about whether PR funds could be spent on planning. I think spending PR (restoration) money for planning is still an open question.



Consequently, the Wildlife Director chose to explain that the Board's working group was specifically NOT about gathering public input for a new management plan. The group's function was changed to just '*Listening to the selected public about all things Dall sheep.*' The group assembled by the Board was a collection of competing special interests, and despite the expenditure of \$200,000 from the Wildlife Division's (non-PR) budget and the guidance of a famous facilitator, nothing was accomplished.

3. The existing/original management plan for GMU 19C was then known as the "Farewell Sheep Management Plan." It was approved by the Board in 1975, and to my knowledge, has not been materially changed. The management goal at that time was "Hunting under aesthetic conditions." This original goal raises some questions: Is this still a relevant goal? Is/has it been generally achieved? Is there a need to alter that existing management goal?

(Another historic note: That goal was established because hunting under uncrowded conditions was already happening prior to 1974, and we saw no reason to change it. A check on the background supporting that plan indicates the intensity of use up through covid was remarkably similar to that prior to 1974.)

My commentary: I argue questions about the management goal are really for the 'manager" (the Department of Fish and Game, which is empowered to do the administrative, budgeting, and financial work necessary for management planning). By extension I argue the answers to these management questions are beyond the "regulator" (the Board, which is prohibited from addressing these fiscal and administrative powers). Hence, if the Department (influenced by local complaint or an evolved view of management plans) decides changes in the management plans are necessary, it may exercise its administrative, budgeting, and financial expenditure powers (within any relevant constraints) to rewrite the management plan for GMU 19C.

After the Department staff (the on-ground managers) has written a plan it deems necessary for management purposes, the Commissioner may (or may not) approve the plan. If the plan is accepted by the Commissioner, the Department may submit any required regulatory changes as regulatory proposals (within the Board's specific functions) to the to the Board for approval through appropriate procedures. Once the Department (the manager) has submitted it's regulatory proposals (backed by policy rationale and biological data) the Board, after hearing input from local Advisory Committees, may or may not approve the Department's proposed regulations. I can find no directive involving the Board in more than regulations (primarily seasons and bag limits) that may implement (or block) the Department's planned implementation via regulation.

As close as I can come to Board of Game involvement in management planning is the following: **AS 16.10.375, Regional Salmon Plans.** clearly assigns authority to the Commissioner to approve regional salmon management plans. The Board of Fisheries is not included or even mentioned.

Also, **AS 16.20.3110. Game management Plan for Bison** clearly assigns authority for approving this plan to the Commissioner. The Board of Game is not mentioned or included in this approval.

AS 16.20.350 (relating to establishing (perhaps, 'the' moose range) shows management responsibility for the Moose Range is clearly placed with the Department. The Board of Game is not included or mentioned.

If management is to be "by specific plan," it appears planning and management functions are the responsibility of the Department. I can find no place for the Board to be involved in planning recommendations (beyond, my hypothetical case where a Board resolution may come from the Board to the Department because the Department has not addressed a local concern that is outside of, or a significant deviation from, the existing management plan. This sort of specific planning detail is what occasioned Joel Bennet's failed lawsuit. Is the level of detail that interested Mr. Bennet necessary to manage?



Please indulge a philosophical consideration: The reason anyone makes a plan is to control or prescribe and adaptive reaction to anticipated future events. This assumes control of or at least generally predictable future events.

By making what experience has shown to be specific “pie in the sky” wildlife management plans, the basic assumption underlying wildlife management plans is that ‘all’ environmental factors will be stable, or at least predictable. This is clearly not a correct assumption as shown by events (driven by weather where Dall sheep are concerned— or wolf harvests in Southeast) we cannot anticipate, control, or manage. When we act like we can predict or control the future, we’re probably kidding ourselves. The better ‘management plan’ exists in Alaska’s Constitution Article VIII Sections 1-4. That direction should be sufficient.

4. The Board of Game got (at it’s request) a comprehensive status report and analysis of causes for Dall sheep population declines from the Department in October of last year. The available data strongly suggest the cause of sheep declines is weather-related, and that mature ram harvests were not a factor.

Then, in December, members of the Board of Game received complimentary copies of how we got where we are with Dall sheep management in Alaska. Both the management history and the Department recognized that harvests of surplus mature Dall rams by humans are biologically sustainable (even after adverse weather). Nevertheless, the Board acted independently of this presumably expert advice to curtail (or reallocate) harvest of mature Dall rams by nonresidents in GMU 19C.

My comment: The inconsistency here is the apparent assumption that an (apparently anticipated compensatory resident harvest, if we’re to provide maximum use opportunity) will be somehow less biologically relevant to population recovery than the existing harvest by nonresidents. That makes no biological sense to me.

Consequently, I reason this decision could not have been driven by biological conservation concerns, sustainability, or opportunity for maximum use (from Article VIII of Alaska’s Constitution). Consequently it does not appear rationally related to “conservation and development” (the reasons the Board of Game exists). Hence, this prohibition must have been driven by other forces. The record shows that human emotion was the major influence.

My recommendation for the Board is that it NOT INTRUDE FURTHER into fundamental management for any species, specifically Dall sheep in GMU 19C at this time. One management mistake has (in my opinion) already been made. Following the statutory guidelines is a big enough job for the Board.

IN SUMMARY: I think the decision to ban nonresident hunting in GMU 19C was a ‘reach’ by the Board. The ‘reach’ came via a “Board-generated” proposal that was ‘creatively managed’ by the way it was proposed, the way it was amended by the Board, and then passed by the Board., and the way the economic considerations were set aside. I urge the Board to NOT intrude further into management, but stick to its statutory “management requirements” and respect its prohibitions on administrative or fiscal activity. We have the Department for that.

I **encourage the Board** to consider the other given reasons for this meeting. I do not support allocations of Alaska’s caribou resource for federal preferences that are contrary to the Alaska Constitution. Doing so cedes Alaska’s right to manage to the federal subsistence program which is not allowable under the “common use clause” of Alaska’s Constitution.

If the Board needs to assign a member to the “Guide Board,” that’s OK with me.

Thanks for your consideration,

Wayne E. Heimer, (no longer a manager, but still a Dall sheep biologist)