

ACR #4 – Limit or restrict all nonresident sheep hunting in Unit 19C.

SUBMITTED BY: Resident Hunters of Alaska

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.

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

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM.

Continued sheep declines in Unit 19C, unlimited nonresident opportunity and increasing nonresident harvests.

WHAT SOLUTION DO YOU PREFER?

Limit or restrict all nonresident sheep hunting in Unit 19C. Our preferred option would be for all current nonresident sheep hunting in Unit 19C to go to draw only, with a limited allocation of not more than 30 permits. With continuing sheep declines and high nonresident harvests, this would be a far better solution than going to draw only for everyone down the line – which is very likely if sheep don't rebound – and a subsequent draw only hunt for all with a 10 percent nonresident allocation of permits.

The Board of Game (board) really should have a framework in place so that before any resident sheep hunting opportunities can be limited or restricted; if nonresident hunting is allowed, then that component should always be addressed first. That didn't happen in Units 13D/14A in the Chugach when we had similar issues and conservation concerns. That didn't happen in Unit 19C in 2020 when the Department of Fish and Game (department) closed the subsistence sheep season.

STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:

1) To correct an error in regulation.

N/A

2) To correct an effect of a regulation that was unforeseen when a regulation was adopted.

N/A

3) Does the request identify a biological concern for the population or a threat to meeting objectives for the population?

The department had conservation concerns for the Unit 19C sheep population in 2020, enough so that the RC 380 subsistence sheep hunt in the unit was canceled. No trend counts were able to be conducted in 2020 or 2021, but reports from guides and hunters in 2021, and department observations, show that the situation has not improved and in fact is likely worse.

The 2021 RC 380 subsistence sheep hunt will nearly be eliminated, with no ewes allowed to be taken and a reduced quota of only 2 rams less than $\frac{3}{4}$ curl.

- 4) **Does the request identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f)?**

Customary and traditional subsistence sheep hunting opportunities in Unit 19C were denied in 2020 and severely curtailed in 2021 over sheep conservation concerns, yet unlimited nonresident sheep hunting opportunities are still being allowed.

- 5) **Does the request identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future?**

We are greatly concerned that a continued delay to address severe sheep declines in Unit 19C will lead to the area going draw only for all, or an emergency action by the department restricting sheep hunting for all, when the hunters taking the vast majority of the sheep harvest each year are nonresident hunters. Continued unlimited sheep hunting opportunity in Unit 19C, along with unlimited number of guides in the unit, has gone on too long and needs to be addressed before resident sheep hunting opportunities are limited or restricted. The same is true on the subsistence side when the department restricts subsistence sheep hunting opportunities because of ongoing sheep conservation concerns in Unit 19C. The current dynamics with the sheep population and unlimited nonresident sheep hunting opportunity is not beneficial to any group, including guides and their nonresident clients.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?

See above; the unanticipated postponement by a year of in-cycle board meetings due to the ongoing pandemic has further pushed this issue to the Region III (Interior Eastern Arctic Region) 2024 meeting. Continuing to wait until the in-cycle regional meeting to address this issue could lead to all resident hunters losing opportunities should the sheep population continue to decline. The board should address this issue at one of the 2022 regulatory meetings.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

N/A

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

The board considered a similar ACR in 2020 submitted by a longtime guide in Unit 19C who relayed that he'd witnessed severe sheep declines and requested that all sheep hunting in Unit 19C (for both residents and nonresidents) be restricted for two years. At that 2020 ACR meeting, the board heard testimony from the department in which sheep data was presented showing that "a likely decline of 40% to 60% has occurred in 19C." The department also canceled the 2020 RC 380 subsistence sheep hunt in Unit 19C due to conservation concerns. That ACR was voted down 2-5.

The new information is that in Unit 19C (and statewide), sheep numbers are even lower and less legal rams were available in 2021. Also, the percentage of sub-legal sheep that went through the Anchorage office in 2021 was >10 percent, with sub-legal take evenly split between guided and unguided hunters.

Some of the declines and less available full-curl rams in 2021 can be attributed to previous bad winters and low recruitment, but overall we are seeing different weather patterns and warmer, wetter winters that will exacerbate declines and lead to decreased sheep habitat.

Since 2016, RHAK has submitted proposals to the board regarding conservation concerns for the Unit 19C sheep population and continued unlimited nonresident sheep hunting and harvests in Unit 19C. The vast majority of sheep harvests in Unit 19C are from nonresident guided hunters, and with continued sheep declines in the unit the percentage of nonresident harvests has only increased. In 2021, preliminary data for Unit 19C is that there were a total of 97 sheep hunters, 58 nonresident, and 39 resident. Total sheep hunters overall in Unit 19C continues to decline, which correlates with decreased involvement due to sheep hunters recognizing poor sheep population dynamics. **Nonresident sheep hunters accounted for 60 percent of total sheep hunters in Unit 19C in 2021 and took 85 percent of the total harvest.** (See department data below). There are no limits on guides in Unit 19C or nonresident hunters required to hire a guide. This same scenario of unlimited guides and nonresident hunters led to the loss of general hunting opportunity for all in the Chugach in 2009. This has been our concern all along, that the board would wait too long to impose limits on nonresident hunters, until the situation became more concerning and it went to draw only for all, with residents again losing opportunity when resident hunting was far and away much less of an impact on sheep harvests.

RHAK fully understands that the root of these sheep declines in Unit 19C and elsewhere across the state are the result of changing weather patterns and bad winter conditions, avalanches, drownings, predation etc. We have no real means to control non-human predation, as sheep are not included in our Intensive Management species. The main non-human predators of sheep are golden eagles, which are federally protected. **The one thing we can control, however, is the human component.**

To be clear, we are not intimating that limiting nonresident sheep hunters in 19C will somehow lead to increased sheep populations. In other areas with longstanding draw-only sheep hunting opportunities with limited allocations for all, sheep populations have declined. Available tags are being decreased due to conservation concerns or meeting the management goals.

What we are saying, is that limiting nonresident opportunity now will lead to less sheep mortality overall and help prevent the loss of resident sheep hunting opportunities down the line (including subsistence sheep hunts) should the sheep population not rebound.

We recognize that the management strategy for Unit 19C is to provide maximum sheep hunting opportunity, given the department's continued position that the full-curl management regime is sustainable in areas where unlimited sheep hunting opportunity is allowed. But in other units with the same management strategy, sheep hunts have gone to draw only because of sheep conservation concerns. It isn't at all far-fetched to believe the same could happen in Unit 19C. Continued

unlimited nonresident sheep hunting opportunity and increasing nonresident harvests in Unit 19C should be addressed now.

ADF&G Data 19 C sheep harvests 2017-2021 (*2021 data is preliminary)

	N	R	Total killed
2017	61	46	107
2018	79	39	118
2019	75	39	114
2020	53	14	67
2021	33	6	39

(*Total # of sheep hunters in 2021 was 97, with 58 nonresident and 39 resident)

STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.

Resident Hunters of Alaska (RHAK) is a hunting conservation organization advocating for sustainable wildlife management policies geared toward a resident hunting priority.

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.

See above, a similar ACR was heard at the November 18, 2020 ACR meeting, and was voted down 2-5. RHAK has submitted similar proposals during in-cycle regulatory meetings to limit nonresident sheep hunting opportunities in Unit 19C since 2016.