



Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION
Headquarters

1255 West 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.4190
Fax: 907.465.6142

November 12, 2021

An Agenda Change Request (ACR 4) has been submitted by Resident Hunters of Alaska to the Alaska Board of Game requesting to change 5 AAC 85.055(a)(4) Hunting seasons and bag limit for Dall sheep. The proponent is asking the board to limit or restrict all nonresident sheep hunting in Unit 19C with a preferred option to implement a draw for nonresidents with up to 30 permits issued.

With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C. The department believes existing regulations are contributing to a decline in sheep populations in Unit 19C. Sheep survey data in 2019 indicate there was a large decline in total sheep numbers after the winter of 2018/2019. The department was not able to conduct surveys in 2020 or 2021 due to poor weather. However, reports from guides and hunters in the field as well as surveys in other portions of the Alaska Range corroborate a large decline in sheep in unit 19C has taken place. Due to biological concerns the RY20 winter hunt (RS380) was closed by emergency order and in RY21 the RS380 bag limit was restricted to rams only. General season harvest in RY21 is on track to be the lowest recorded in the past 40 years.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is unaware of any unexpected resource situation that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action.

There is a positive customary and traditional use finding for sheep in Unit 19, and an amount reasonably necessary for subsistence of 1-5 sheep. There is a youth hunt from August 1-5 and an unrestricted fall hunt (harvest ticket) for both residents and nonresidents from August 10 – September 20. There is also a winter registration permit hunt (RS380) for residents only with a bag limit of one sheep with $\frac{3}{4}$ curl horn or smaller; excluding rams with both tips broken, lambs, and ewes with lambs during October 1 – April 30. While the regular sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide subsistence opportunity according to the pattern of customary and traditional uses. RS380 was closed by emergency order in RY20 and has a restricted bag limit for RY21 due to biological concerns.

In 2020 ACR3 was submitted to the Board which would have closed the Unit 19C general sheep season to all hunters for 2 years or shortened the season from August 10-September 20 to September 10-20. The

Board did not accept the ACR because the Department has emergency order authority to close or shorten seasons. If the Department uses its emergency order authority to make changes to the general sheep season it would affect both residents and nonresidents. Potential changes could include closing the youth hunt, closing or shortening the general season hunt, or continuing to limit the bag limit during the winter registration permit hunt or closing it entirely.

The next regularly scheduled board meeting for Unit 19 regulations is during winter/spring of 2023/2024. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2022 meeting in Fairbanks to allow for more public input.

Sincerely,

A handwritten signature in cursive script that reads "Ryan Scott".

Ryan Scott
Assistant Director
Division of Wildlife Conservation