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Resident Hunters of Alaska (RHAK)

A Voice for Alaskans! Protecting and Enhancing our Hunting Opportunities!

Proposal 267
Limit Nonresident Sheep Hunters
in Unit 19C

Proposal 267 – Limit or restrict all nonresident sheep hunting in Unit 19C

ADF&G Comments on RHAK Agenda Change Request #4, now proposal 267:

“The Department believes that existing regulations are contributing to the decline in sheep populations in Unit 19C...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.”

ADF&G Comments on ACR #3, submitted by Unit 19C guide in 2020:

“There may be a biological concern if existing regulations remain in place, although ADF&G does have emergency order authority to close seasons if necessary. The Unit 19C sheep population experienced a large decline in sheep in 2019. It also likely experienced a large decline in 2020, although we were unable to survey this summer. Due to biological concerns, the RY20 winter hunt (RS380) was closed by emergency order. In addition, there was a very poor lamb cohort in 2013 and those sheep would be 8 years old in RY21. Combined, these effects suggest few full curl rams will be available in RY21 and hunting will be poor.”

Timeline of Department comments:

November 2020 – Department states there “may be a biological concern” for Unit 19C sheep population.

The Department closes the Oct. 1-April 30 2020/2021 winter subsistence sheep hunt (RS 380) by emergency order based on “biological concerns.”

November 2021 – Department states that “existing regulations are contributing to the decline in sheep populations in Unit 19C.”

The Department restricts the 2021/2022 winter subsistence hunt to maximum of one ram with less than $\frac{3}{4}$ curl. There is a positive Customary and Traditional Use finding with an ANS of 1-5 sheep.

March 2022 – Department is “neutral” on RHAK proposal 267, states that “while it is clear sheep have declined in 19C, the decline was weather related and not hunting related.”

AS 16.05.258(b)(2): If the harvestable portion of the stock or population is sufficient to provide for subsistence uses, and some, but not all, other consumptive uses, the appropriate board

(A) shall adopt regulations that provide a reasonable opportunity for subsistence uses of those stocks or populations

(B) May adopt regulations that provide for other consumptive uses of those stocks or populations; and

(C) Shall adopt regulations to differentiate among consumptive uses that provide for preference for the subsistence uses, if regulations are adopted under (B) of this paragraph

(3) If the harvestable portion of the stock or population is sufficient to provide for subsistence uses, but no other consumptive uses, the appropriate board shall

(A) Determine the portion of the stocks or populations that can be harvested consistent with sustained yield; and

(B) adopt regulations that eliminate other consumptive uses in order to provide a reasonable opportunity for subsistence uses; and

(4) If the harvestable portion of the stock or population is not sufficient to provide a reasonable opportunity for subsistence uses, the appropriate board shall

(A) adopt regulations eliminating consumptive uses, other than subsistence uses;

Department Slides/Comments on
RHAK Proposal 52 to implement drawing
hunts for nonresidents in 19C & 20A
March 2020 Region III Meeting

“There is no biological concern
given the full curl requirements
for nonresidents and residents”

Unlimited nonresidents, unlimited guides,
guided sheep hunt >\$20,000, there is
always no biological concern until the
tipping point, just like in the Chugach.

Proposal 52 - Sheep Drawing Permit

What would the proposal do?

Implement drawing hunts in the place of nonresident harvest ticket sheep hunts in Unit 20 remainder and Unit 19C and limit the allocation to 50 permits for each hunt.

- Nonresidents only eligible for 50 permits in Unit 19C and 50 permits in Unit 20 remainder
- Nonresidents only eligible for permit every 4 regulatory years
- Residents continue hunting with HT in both locations or by RS380 in 19C

Proposal 52 - Sheep Drawing Permit

- This proposal may eliminate ~35 nonresident hunters in Unit 19C and ~23 nonresident hunters in Unit 20 remainder
- There is no biological concern given the full curl requirements for nonresidents (every 4 regulatory years) and residents
- In both locations the department has heard concerns regarding allocation issues

Rationale for opposition to Proposal 267:

It will be too great of a loss of revenues to the Department if we restrict or limit nonresident sheep hunters, and a loss of income to guide and other businesses.

There is no need to limit nonresident sheep hunters, there are no conservation concerns with the full curl management strategy.

Alaska Professional Hunters Association (APHA) comments on Proposal 267:

“The APHA opposes Prop 267 because it is NOT conservation based and purely allocative.”

ADF&G Commissioner Doug Vincent-Lang:

“My number one goal, as mandated by Alaska’s constitution, is to deliver to the people of Alaska the maximum use and benefit of fish and game resources while ensuring a sustained yield for future generations.”

(source: <https://www.adn.com/opinions/2021/06/05/defending-the-hunting-rights-of-alaskans/>)



- Sheep are in decline
- Climate and sheep habitat changing
- Successive bad winters and icing events
- Can't control predation
- Fewer FC rams, sub-legal harvest increasing

Bottom Line

Watchful Waiting not a solution at this time when we have biological concerns.

Nonresident guided hunters take vast majority of harvest annually. That is the component that needs to be limited or restricted.

There is no need to limit or restrict residents at this time.



**Board Members
Board Support & ADF&G Staff**



unapologetically FOR ALASKAN RESIDENTS

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