

Public and Advisory Committee Comments

Adam Agosti	PC01
Alaska Professional Hunters Association (APHA)	PC02
Alaska Safari Club International.....	PC03
Alaska Wild Sheep Foundation	PC04
Marshall Alexander	PC05
Rod Arno/Alaska Outdoor Council	PC06
Zach Baker.....	PC07
Robert Bourland.....	PC08
Scott Breitsprecher	PC09
Jeff Burwell.....	PC10
Jeff Carlson.....	PC11
Robert Caywood	PC12
Ivan Clark.....	PC13
Aaron Colburn	PC14
Scott Collins.....	PC15
Shawn Davis	PC16
Eric Eckard	PC17
Kolton Eischens	PC18
Jacques Etcheverry	PC19
Fairbanks Fish and Game Advisory Committee	PC20
Chase Ferris.....	PC21
Paul Ferucci	PC22
Paul Forward	PC23
Colt Foster	PC24

Public and Advisory Committee Comments

Steve Gabrielsen	PC25
Brett Gibbens	PC26
Karen Gordon.....	PC27
Steven Hallenbeck.....	PC28
Nathan Hannah	PC29
Drew Hatter	PC30
Wayne Heimer	PC31
Jerry Herrod	PC32
Pete Imhof.....	PC33
Dan Jirak.....	PC34
Gabriel Juliussen	PC35
Grant Kopplin	PC36
Travis Kuehl.....	PC37
Zachary Larsen	PC38
Michael Larson.....	PC39
Philip Latteier	PC40
Caleb Latteier	PC41
Jerry Lees.....	PC42
Erin Lester	PC43
Ernesto Lopez.....	PC44
David Lorrington.....	PC45
Michael Makar	PC46
Marty Meierotto	PC47
Joseph Mirasole	PC48

Public and Advisory Committee Comments

John Monnin	PC49
David Moore	PC50
Henry Munter	PC51
Ian Newman	PC52
Philip Nuechterlein	PC53
Brian O’connor	PC54
Jacob Ohms	PC55
Spencer Pape	PC56
Rich Peterson	PC57
Richard Ray	PC58
Jack Reakoff	PC59
Resident Hunters of Alaska (RHAK)	PC60
Chase Ronsman	PC61
Otis Rowland	PC62
Kim Saner	PC63
James Smith	PC64
Matt Soloy	PC65
Brian Stoltz	PC66
Dustin Tallman	PC67
Zachary Truskolaski	PC68
Kristina Votaw	PC69
Jay Wattenbarger	PC70
Wild Sheep Foundation	PC71
Ethan Williams	PC72

Public and Advisory Committee Comments

Birch Yuknis..... PC73

Frank Zaldivar..... PC74

Adam Zank PC75

Adam Agosti

Wasilla, AK 99623



PC01

Alaska Department of Fish and Game

ATTN: Board of Game, Dall Sheep informational meeting: October 19, 2022

P.O. Box 115526

1255 W. 8th Street

Juneau, AK 99811-5526

Dall Sheep Action

To whom it may concern,

My name is Adam Agosti. I am a lifelong Alaskan, who was born and raised in this great state. As many others, I am deeply drawn to the wild and rugged backcountry of Alaska. Our resources are invaluable, and we have responsibility to be stewards to the land. As an avid sheep hunter who wants to see these wonderful animals prosper, action must be taken before we lose this crucial resource. I personally have seen a decline in sheep population in my 6 years of hunting sheep consistently.

With the growing popularity of Dall sheep hunting, actions must be taken to ensure the sheep populations stay healthy. There are some factors that are completely out of our control, such as winter weather and natural disasters, however there are factors that are in our control. Dall sheep is an Alaskan resource, though it draws in many people from all over the world. We must ensure Alaskans from all walks of life are able to use this public resource if they desire too.

Actions that are within our span of control:

-Education. Dall sheep regulations are complicated at best and require a great amount of knowledge and field time to determine a legal ram. I am not talking about the curl and a half ram, but the ram that just meets full curl or passes the stick or base angle test. I believe **ALL** sheep hunters should be required to take a Dall sheep legality course before heading off into the backcountry to best prevent the possibility of taking a sub legal ram, especially now with the population dwindling.

-Limiting non-resident sheep tags through guide outfits, or next of kin hunting. I know this is a statement with great impacts, due to professional guide outfits relying on non-resident hunters for their income. As stewards of the land, it would be in their best interest to have this great resource thrive for generations.

-Predator control. Sheep are a target to predatory animals, especially in the winter months when they may be at lower altitudes. Incentivize and liberalize predator hunting. Open wolf and coyote hunting to year-round or until area quotas are met.

-Limiting access to areas, such as walk in only. With the ever-growing use of airplanes to get to the backcountry, limiting access to fly in hunting operations, where walk in hunters are able to enter, via road system or trails, without the competition of airplanes.



-Draw system. This would be a last resort if the population continues to decline. As much as I don't want to see it go to a draw system statewide, it may be necessary to preserve the sheep and I would accept that in the name of conservation.

Thank you for your time and reading my comments.

Respectfully,

Adam Agosti



October 13th, 2022

Dear Alaska Board of Game Members:

The Alaska Professional Hunters Association (APHA) submits the following comments for your special October 19th meeting to consider information on sheep populations. The APHA is a statewide organization with the mission to support and enhance wildlife conservation, hunting guide professionalism and fair chase hunting in Alaska. The APHA held a special group teleconference and solicited and received email input from members to prepare these comments. Guides who rely on sheep hunting from every mountain range in Alaska that contain sheep except the Kenai, provided the input reflected in these comments.

Guide Observations, Sheep Numbers and Conservation:

Guides report that full curl rams and sheep numbers have declined significantly in the following regions: Talkeetna Mountains, south side of the Brooks Range, north and south side of the Alaska Range, north and south side of the Wrangell Mountains and in western portions of the Chugach Range. Guide estimates for the declines vary from 50% to 70% of the total population in many areas. The north-central Alaska Range to the western Alaska Range is reported to have gone from record high numbers of sheep to extremely low numbers during the past two winters.

Declining hunter success rates, harvest of younger rams, anecdotal reports of marginal and/or sub-legal rams being harvested by guides and residents and diminished interest from clients to hunt sheep in Alaska in the future, are some of the outcomes of these declines that are consistent across the different regions. Guides also expressed strongly that they will be adjusting hunt numbers downward with some intending not to offer sheep hunts in the next few years. Many of the guides who indicated they will not be offering sheep hunts in the next couple of years have been guiding hunters for decades. Additional observations include:

- Guides in most areas of the state observed significant sheep population declines in the past two years
- Guides attributed declines to weather but guides expressed concern about Movi and predation as potential exacerbating factors in the decline
- Guides familiar with areas closed to hunting observed declines in closed areas that mirrored areas open to harvest
- Guides who hunt in drawing areas observed declines at the same rate as areas managed by harvest ticket with general season, open opportunity
- Legal ram numbers are diminished significantly
- Success rates have declined
- Younger rams are being harvested
- Concerns expressed about sub-legal take



Management Discussion:

The APHA's members expressed a variety of viewpoints about sheep management in Alaska. Some guides voiced concerns about younger than usual sheep being harvested. Some guides questioned whether full curl management is sufficient to recover populations quickly. All guides agreed that predator control or other intensive management techniques could rebuild populations sooner. All guides felt strongly that winter weather conditions, and in some cases predators, caused the sheep declines, not human hunting. All guides expressed a desire to work with and support management of sheep with the goal of rebuilding populations.

The APHA has members who hunt on state, federal and private lands. Guides who hunt on state land were more likely to entertain total closure of sheep hunting opportunities for residents and non-residents in their units. Guides holding federal concessions and private land permits were more likely to support status-quo or some alternative strategies to reduce harvest and grow mature rams without total closures. All guides felt strongly that drawing hunts were the most harmful for all user opportunity with a strong consensus being that other alternatives should be attempted first. Opposition to drawing hunts was based on the fact that strictly controlled drawing areas and national park areas experienced declines similar to, or worse in some cases, than areas managed with over-the-counter general seasons hunts. Federal concession holders expressed confidence that hunt numbers could be sustainably reduced voluntarily until hunter success rate and legal ram numbers begin to rebound, while state land permit holders were fearful that unlimited guide numbers could undermine efforts to reduce effort. All guides in attendance, regardless of land permit status, expressed an interest in learning more about sheep biology and what kinds of conservation strategies could be done to help aid recovery. All guides were also supportive of a thoughtful and deliberative approach to considering what restrictions might be appropriate, if any.

APHA Analysis:

Dall sheep management in Alaska has been an objective success for many, many decades. Full curl management allowed populations to recover from the steep declines in the early 90s with little or no additional restrictions. The recent crash in sheep populations in Alaska is not isolated. We hear similar declines have occurred across Dall sheep populations in the Yukon and Northwest Territories, although these are anecdotal reports at this time. What is clear is that sheep populations in un-hunted areas have fared the same as hunted areas. Hunted areas have all declined regardless of how they are managed. The only areas that we are receiving reports of slightly better mature ram numbers are federal areas limited to one guide, but this is anecdotal at this stage. The APHA understands that three basic paths forward are being discussed at this time.

1. Status-Quo



This option makes no changes to sheep management in Alaska and allows the population decline to run its course while limiting hunter harvest to full curl, 8 yr. old or double broomed rams. Option 1 assumes that hunter effort will decline based on lower resource abundance but does not modify hunting opportunity.

- Advantages
 - Allows for more data gathering
 - Spreads pressure evenly across the state
 - Negligible cost
- Disadvantages
 - Risk of additional federal land closures
 - Harvest rates might be high enough that populations or hunt quality could remain depressed longer

2. Statewide Sheep Hunting Closure

This option closes sheep hunting statewide for a period of time with the assumed goal of allowing additional immature rams to recruit to legal age and/or horn configuration. Some supporters of this option feel this will help ewe fecundity and potentially boost lamb production.

- Advantages
 - Statewide action forestalling piecemeal federal closures
 - Allows for thorough survey and inventory post-decline
 - Harvest pressure will not intensify in areas left open
- Disadvantages
 - Lack of scientific data supporting population level benefits of closing hunting
 - Unprecedented
 - Significant cost to both the state and the public
 - Closures will impact areas not affected by population declines

3. Form Working Group or Sheep Management Task Force

This option assumes that a formal group of agency personnel and perhaps limited numbers of stakeholders would meet publicly to review scientific research and data, and to discuss conservation objectives that benefit and recover sheep populations in Alaska. This option assumes that the work product would incorporate a series of recommendations based on best available science, to accomplish conservation goals. This option also assumes that implementation of the plan may require action by decision making bodies including: ADFG, Board of Game, Big Game Commercial Services Board, AK legislature and land owners. For this discussion it is assumed federal representatives will participate and sign off on the final work product.

- Advantages



- Leverages and elevates state's role as wildlife manager
- Generates "buy-in" from hunting public to work towards sheep conservation goals
- Creates a defensible process that promotes legislative action if funding or statutory reforms will be needed to assist population recovery
- Reduces risk of dual state/federal sheep management
- Disadvantages
 - Defers immediate management actions
 - Potentially costly - additional workload for agency personnel, additional time commitment for volunteer board of game members, additional work for members of public to participate
 - Potential to result in conservation objectives requiring opportunity reductions and allocation changes to non-resident hunter opportunity

Federal Issues:

Alaska's department of fish and game has overseen a successful sheep management strategy since statehood. Until 2022, all federal lands open to hunting were managed by the state with the only difference between state and federal land units being that guides are limited by concessions on federal lands. In late summer of 2022, the Federal Subsistence Board closed large portions of the central Brooks Range to all hunting based on concerns that harvest under the full curl management strategy had the potential to have population level impacts on weather decimated sheep populations. The recent FSB closure was supported by federal land managers whose lands are currently open to sport hunting. State managed sheep hunting opportunities on national wildlife refuges and park preserves are likely being scrutinized by federal managers at this time.

The FSB voted to close sheep hunting even as the state opposed the closure and argued that full curl management effectively neutralizes human hunting effects on the population level. Because the FSB acted on recommendations from federal biologists, it is clear federal managers have their own ideas on how to manage sheep. This divergence between state and federal managers is troubling and needs to be rectified soon. Alaska's board of game has more tools available to work towards conservation objectives than do the federal managers. Federal managers can limit commercial opportunities and close areas based on rural determinations while the Board of Game can alter seasons, bag limits, methods and means and discriminate in allocations regimes in a more targeted manner. Large Dall sheep population declines have occurred before. It is imperative that federal and state managers agree on conservation concerns, management objectives and ultimately how to manage human harvest to rebuild herd numbers.

The APHA encourages the Board of Game to work with the department to develop a venue where federal managers can be brought to the table to work through harvest data and the best available science with the goal of maintaining a cohesive, statewide sheep hunting



management structure into the future. Hunting guides who rely on sheep hunts for their livelihood will be more than willing to be part of the solution and work with both state and federal managers to maintain stability while populations rebuild.

The APHA is supportive of federal concessions and remains supportive of limiting guides on state land with a similar program. The worst-case scenario for federal concession holders, is reductions by federal landowners as a result of dual state/federal sheep management strategies.

Summary:

In the near term the APHA is narrowly focused on understanding the recent sheep population declines. Many of our members reduced sheep hunting effort in 2022 and will be either further reducing effort in subsequent years or, in some cases, not taking any sheep hunters beyond 2023. Guide reductions in sheep hunting effort is based on the goal of providing high quality, high success rate opportunities through periods of low abundance. We expect this reduction in guided effort to begin showing up in harvest reports in 2022 with further reductions in 2023. We also expect reductions of guided sheep hunting effort in the 30-40% range to occur on both state and federal lands, although larger reductions are possible in harder hit regions.

Reductions in guided hunter numbers will likely have little or no population level benefits for sheep in Alaska. The APHA is supportive of considering additional options to support population recovery such as predator control on state land areas where predation is a significant natural mortality factor. The APHA is also supportive of additional studies that quantify impacts to sheep population, if any, from full curl harvests. This type of study would compare geographically similar areas closed to hunting with areas that remain open to harvest. Our members have expressed the need to more fully understand impacts from full curl management, if there are any, with the goal of defending state management strategies and ensuring that management remains conservation based and sound. Finally, we are concerned about illegal take of young rams.

As an association, we are confident in our representation that Alaska's guides are open to a robust discussion on sheep conservation in Alaska and will be willing to work towards achieving set management objectives as well as securing any resources necessary to help the department. The APHA encourages the Board of Game and the department to take the ram by the horns to fully lead a science-based discussion for the benefit of hunters and one of Alaska's most important and globally significant wildlife populations.



Alaska Safari Club International
P.O. Box 770511
Eagle River, AK 99577

13 October 2022

To Chairman Burnett and Alaska Board of Game members,

Thank you for the opportunity to provide comments ahead of the informative Board of Game meeting scheduled for October 19, 2022 pertaining to the status of Dall sheep in Alaska. The Safari Club International Alaska has always been “First for Hunters”. Core to this mission, SCI Alaska has a long-standing vested interest in healthy and abundant Alaskan wildlife resources which can then support ongoing sustainable and quality harvest opportunities.

While we recognize all wildlife populations fluctuate over time, it has become difficult to ignore steady and significant declines in Dall sheep in some areas of the State. From Dall sheep Emergency Order closures in the western Brooks Range, to recent federal Dall sheep closures in the central Brooks Range, to being on the verge of closing the Tok Management Area, to minimally viable sheep numbers on portions of Kenai sheep range, it is clear we need to start talking about how to better manage Dall sheep in our state.

We come to you today as an organization of concerned Alaskan hunters first and foremost, ready and willing to start thinking outside the box. Resident sheep hunters and guides will be the first to describe the late spring in 2013, how it resulted in high lamb mortality, and how it has impacted sheep hunting success these last three years. They will also tell you how the winter of 2021-22 started too early in the month of September and didn’t end until early May, and the negative impacts this had on older cohorts of sheep as well as on lambs.

As this is an informational meeting, we look forward to learning more about current population dynamics as well as what future plans ADF&G has as well as the Board. As we move forward together, we have a few thoughts and recommendations:

Management

We are thankful for ADF&Gs increased research efforts focused on Dall sheep in the past decade. We have learned of a widespread occurrence of a new strain of M. ovi, but we don’t yet fully know what if any effect it is having on sheep. We have learned central Chugach sheep are in poor physical condition and have numerous predators and mortality factors. We also understand managers fly well established survey areas on a regular rotation in some regions, but there’s no consistency statewide. We know full-



curl management is a sustainable harvest structure, but it doesn't preclude creative management strategies that may best suit Alaska.

Recommendations to ADF&G:

- **Monitoring:** Raise the bar. Increase consistency of comprehensive sheep surveys statewide. 1) Surveys every 3 years should be the minimum, with more in poor years, 2) Use consistent and experienced survey pilots and observers, 3) use consistent methodology, track ewes, lambs and age classes of rams, document conditions, use photography if necessary. Consider expanding survey windows to include post-season. Use experienced contractors if staff are unable to prioritize surveys. Incorporate sheep hunter and guide input as they are in the field annually in significant numbers. Balance funding for research and management; research must inform management. Every manager must submit detailed survey memos, documenting data collected and observations in a consistent manner. Communicate this information to the public in a more regular and consistent manner. Draft non-intensive management plans (such as for muskoxen in 26b) to affect positive change for Dall sheep going forward. Work closer, across the state with federal groups at all levels from direct agency outreach to regular involvement in the federal process to reduce further federal closures.
- **Research:** Shift from baseline data collection to active management projects. Identify areas to test strategies of sheep population recovery such as 1) an interior area where target predators can be removed (example remove entire wolf packs in TMA or DMA high country early in the winter to increase adult over-winter survival), 2) an area where target predators can be removed such as coyotes to increase lamb survival especially following current Snowshoe hare declines, 3) pursuit of experimental golden eagle removal with federal authorities to increase lamb survival, 4) an area where heavy snowfall consistently reduces sheep numbers such as the Kenai, Talkeetna or Mentasta mountains due to movement and foraging limitations, supplement feed/minerals to increase over-winter survival, 5) an area where habitat change has occurred such as the elevational creep of shrub growth such as the Kenai or central Chugach, either study existing new fire effects on sheep or establish a study area where controlled burns, fertilizing, etc. can be used to restore historical sheep habitat, or some combination of the above.
- **Administrative:** Explore options for expanding the toolbox for Dall sheep management. Whether it is working on reducing predation from priority and/or protected species, updating intensive management statutes or exploring non-intensive management options, take action now to reduce declines in sheep populations and actively work towards recovery. The last Dall sheep operational plan period 2016–2021 just ended. It was too wide of a period, the public is not able to get adequate and timely population and harvest updates this way. Going forward, ensure that upcoming reports are more regular, comprehensive, action-oriented and on-time. Make this a DWC priority.

Allocation

As Dall sheep populations decline, allocation becomes more and more important. While harvest is not believed to be the cause of any current Dall sheep declines, it will become more contentious going forward. Unless the Board cycle is amended, we will see a series of cascading declines in viable sheep hunting opportunities, more overreach by the FSB, increased hunter conflict and a continual increase in



the take of sublegal rams. This will consistently increase pressure on remaining areas, creating a negative feedback loop for Dall sheep hunters and populations alike until conditions improve.

Recommendations to the Alaska Board of Game:

- Cycle modification: Sec. 16.05.300 states that “(a) Each board shall hold at least one meeting a year and as many other meetings as it considers necessary.” Regional BOG meetings are currently 3 years apart. This has proven ineffective for adequately tracking populations and modifying harvest/control plans. Going back to a 2-year regional cycle would much better serve the public and the wildlife resources we rely on.
- Special meeting: It is time to think outside the box on tackling Dall sheep harvest opportunities and schedule a statewide Dall sheep meeting where all regulations pertaining to Dall sheep are opened up. It is only with this type of meeting where we can effectively address widespread population issues with possible changes such as:
 - Implement drawing hunts statewide, perhaps with a sunset clause. This is the only way to reduce harvest pressure across the board efficiently and effectively. This would help to restore hunt quality statewide instead of further eroding it with piecemeal changes. At this time, we know of no single sheep population that is increasing or near historic highs. We all know of full-curl areas that continue to see drastic declines in sheep numbers. As conservationists, we must collectively take a step back.
 - Implement reduced harvest opportunities across the board such as 1 sheep / 4 years for resident hunters to match non-resident hunters.
 - Collectively discuss a new process for dealing with sublegal take. We can no longer accept even a single sublegal Dall sheep harvested and left in the field for fear of confiscation. This only hurts conservation efforts.

Thank you again for the opportunity to offer comments ahead of this special meeting. We are all here because Dall sheep populations are in trouble. Some areas will have updated count numbers, some will not. Some will have new research data, most will not. Some will be on the docket, and some will fall through the cracks due to poor weather, a lack of priority by individual biologists or regions or a lack of funding.

We must do better collectively if we are to see Dall sheep populations return to full health and abundance. If we stay with the status quo, we may not have Dall sheep in some areas within 5 years. These are unprecedented times.

John Sturgeon,

President SCI-AK



Dear Alaska Board of Game Members

The Alaska Wild Sheep Foundation (AK WSF) would like to submit the following comments for the Board of Game special October 18th meeting to review information on Dall sheep populations.

AK WSF is an Alaska tax-exempt, non-profit corporation with our mission focused on wild sheep conservation in Alaska. We have a membership of approximately 700, mostly in Alaska but also members in Canada, lower 48, and Mexico who share a passion for the resource. As stated, our focus is on conservation of the resource so we do our best to remain neutral on allocation questions unless they have a definite conservation impact.

In the absence of formal population data, we have relied on hunter and guide observations which have all indicated that sheep numbers are down drastically. Sheep populations appear down statewide with numbers indicating from 50-75% decrease being reported depending on the areas. Some areas were much less affected than others and the converse is also true. Our fellow WSF friends in Canada also report similar decreases throughout thimhorn range.

With the exception of a growing sub-legal ram harvest, the decrease in population numbers is likely attributable to a series of bad winters and the ever-present predator population. This appears to be the position of ADF&G and we would agree. We are therefore facing a decline largely caused by nature and not by hunting. Presentations by ADF&G last January also point to a similar down-turn in the early 90s with a subsequent recovery. Solutions to the population problem should therefore be driven by conservation and not by allocation fixes.

Assuming the decline is naturally produced and the full curl rule is still a good methodology then a natural recovery as occurred in the 90s seems possible. The question becomes are we doing all we can to facilitate and help guarantee the natural recovery of the resource. With the great team of biologists in ADF&G and the ability of NGOs to provide additional resources, we need not accept status quo. It is time to use our collective intellect and resources to challenge ourselves to look for ways to improve our management systems to help guarantee a natural recovery. Actions like developing dedicated funding streams and adding Dall sheep to the Intensive Management Program or other predator controls should certainly be considered.

The current situation provides a good opportunity for ADF&G to form a working group with all their sheep biologists and some of the NGOs to discuss opportunities to improve the Dall sheep management system. These actions could also help assuage concerns from the sheep hunting community that nothing is being done to improve the situation.



Part of any discussions might also be how to improve the information flow on what is happening to wild sheep in Alaska. The exceptional presentations made last January by the department and available online are an excellent example – we just need updates on a more regular basis.

The Board of Game process is still the best way to deal with the reduced harvest opportunity to help eliminate hunter friction while the resource hopefully recovers. There seems to be a number of good ideas out there for discussion. It should be realized that this will not “put more sheep on the mountain” but will decide who gets to hunt the survivors. Dealing with hunter/public frustration is an important part of the process and should not be ignored.

The increasing harvest of sub legal rams is a trend that we clearly have to reverse. All of us can be part of the solution. Education is the initial step with the development of a mandatory class on field judging sheep developed by ADF&G which includes judging and ethics and the presentation of numerous annual field judging/hunting clinics conducted by NGOs like AK WSF. The fines should be stiffened immediately for professionals and if the education does not work on private hunters, then follow with an increase there as well. We also need to review the number of sub legal rams harvested and what was the outcome in each case to make sure our evaluation of harvested sheep and subsequent actions are appropriate and consistent.

We can look at the current situation as a crisis or an opportunity. With a little cooperation from Mother Nature the sheep could potentially rebound naturally. We simply need to challenge ourselves and pull together and seek meaningful ways to enhance our management of this important resource. This can only help to facilitate and guarantee a natural recovery.

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

Kevin J Kehoe, President
Alaska Wild Sheep Foundation

[REDACTED]
[REDACTED]



PC05

Submitted by: Marshall Alexander

Community of Residence: Anchorage, AK

Comment:

Non-residents need to be on a draw system that can also give the outfitter they are working with the ability to book hunts. It works currently in the draw area now. Other states make this work on many species. Also draw cost can increase for both non-residents and residents, if the funds can be directed to sheep. Unlimited tags for non-residents needs to end, they will be ok.



PC06

Submitted by: Rod Arno/Alaska Outdoor Council

Community of Residence: Palmer, Alaska

Comment:

The Alaska Outdoor Council (AOC) is hopeful that when the Alaska Board of Game (board) is considering future management considerations for Dall sheep on October 19, 2022 that they base any changes to the current management of harvest limited to full curl rams on substantial population data.

If the Alaska Department of Fish & Game (the department) provides data that indeed there is a conservation concern for Dall sheep populations under a full curl harvest regime, either statewide or for certain specific herds, that the board consider future actions that will conserve current sheep populations.

If sheep population are not limited by habitat and are well below historical populations that leaves the board but one option, reduce harvest by predators. Weather considerations are clearly beyond the board's purview.

AS 16.05.255(a)(6) allows the board to authorize predation control to recover depleted prey populations. 5 AAC 92.106 - 127 lays out the necessary steps for the department to implement predator control, the law could not be made any clearer.

The board certainly has the authority and responsibility to reduce harvest of rams less than full curl, ewes, and lambs whenever sheep populations are at historic low levels.

It would be inconsistent with Article 8, Section 4 for the board not to close regulated hunts of ewes in populations not sustaining themselves, regardless of how insignificant that harvest number may be.

Harvest of sublegal rams in areas managed under a full curl regime during times of low sheep population should not be tolerated. Violators of the full curl regulations should be prosecuted.

Individuals and special interest groups wanting to increase their allocation of Dall sheep harvest should adhere to the board's 3-year meeting cycle and submit proposals accordingly for specific areas for the board to act on.

Rod Arno
Public Policy Director
Alaska Outdoor Council



PC07

Submitted by: Zach Baker

Community of Residence: Anchorage

Comment:

Dall sheep are arguably Alaska's most coveted big game species. Unfortunately, the populations of these sheep are down. As an Alaskan resident I wanted to express my concern.

I love hunting, and harvesting these incredible animals and would hate to see the opportunity to do this disappear in the future.

I'm writing to tell you that non-resident hunters should never be given priority over residents. Alaska's constitution states that, "the State shall provide for the utilization, development, and conservation of all natural resources belonging to the State, for the maximum benefit of its people." Alaska's people. Not California's people. Not Texas's people. Not the lower 48's people, but Alaskan residents!

Please don't allow outsiders to take what belongs to the people of Alaska. Unlimited nonresident sheep hunting needs to stop wherever it is allowed!

Please prioritize Alaska's hunters and protect our priceless sheep populations.



PC08

Submitted by: Robert Bourland

Community of Residence: Damascus Oregon

Comment:

Please consider using method of take as a management tool to help with declining sheep populations. Using regulations on equipment like archery, traditional archery, flintlock muzzleloaders etc, allows opportunity for hunters to still go afield while helping the sheep with lower harvest rates.

Thank you!

Bob Bourland



PC09

Submitted by: Scott Breitsprecher

Community of Residence: Eagle River AK

Comment:

I seriously urge the Board to look at the evidence of the total decline of the Dall Sheep population and take actions to preserve one of Alaskas great resources. Part of this action should be to immediately limit non-resident hunters and increase the cost of non-residents to hunt Dall Sheep in Alaska.

Sincerely

Scott Breitsprecher



PC10

Submitted by: Jeff Burwell

Community of Residence: Wasilla

Comment:

Hello,

Worst winter and predator decline in the past 5 years that I have experienced. While I'm no biologist it seems the only three things we can do as humans is:

1. Don't Kill Them (change season strategy and 1 every 4)
2. Kill what Kills Them (control wolves and golden eagles)
3. Feed/Mineral Them (try a study area) We now have a 46 day season over the counter tag and can harvest one every year...

Jeff Burwell, Guide sheep in the Mentasta Mountains and TMA since lat 1980's.



PC11

Submitted by: Jeff Carlson

Community of Residence: Chugiak, AK

Comment:

As a resident hunter of Alaska I support the following.

1. Protect our dall sheep population first and foremost

2. Assure that resident hunters have access to Alaska Dall sheep resources prior to guides (both resident and non-resident) and their non-resident hunters.
 3. I oppose a draw system if resident hunters are not removed from the equation as a first step since they are required to have guides that utilize mechanical means to spend hours locating legal rams ahead of season and a pass this cost onto their clients to assure client success that has resulted in a diminishing population due to the commercialization of Dall sheep.
 4. Urge game management follow the science of why the population has reached critically low levels. Do not allow revenue generation for guides via non-resident hunters to play into decision making.
-



PC12

Submitted by: Robert Caywood

Community of Residence: Chugiak, AK

Comment:

The sheep numbers are extremely low and will remain low unless predator control on Golden Eagles. There are 4 times more Golden Eagles than originally estimated

Start predator control on Golden Eagles.



PC13

Submitted by: Ivan Clark

Community of Residence: Chugiak

Comment:

Dear Board,

Dall sheep are important to the residents of Alaska and elsewhere. I believe we are at a pivotal point in management that could change the future outcome of sheep hunting success and experience for decades to come. I urge the Board to request the Department to model current sheep populations including cohort populations, and project it out 10 years. I believe the model will demonstrate that low populations of sheep will be a continued issue for years to come, and become ever worse due to the effect of the 2021 winter. The harvest will may increase above what we saw this year, next, but we will see an unprecedented low harvest in a few short years.

We have fewer sheep on the landscape than at maybe any time in the past. The harsh winters of 2012 and again in 2021 leave a skewed distribution of age class in sheep (both rams and ewes). The 2022 harvest data proves we are not only missing 8-9yo (born after 2012) rams we are missing the older age class of rams (9+). The relentless pressure in 2020-2022 to find rams (due to lack of legal 7-9yo) increased hunting pressure on older rams. We are shifting the harvest to an ever younger class of rams, to the point that the majority of harvest will be skewed to nearly all being 7-8yo. Once we hit the "population trench" of 2021 I estimate the harvest of rams will be 50% of what we saw this year.

While we had a couple easy winters following 2012, the last 3 winters have been abnormal, and the population was depressed since 2012.

As we shift the apex of the age of harvest distribution curve from a 9yo center point to 8yo rams, we are basically eliminating the chance for harvest of older rams because they don't live that long. We have no idea what the significance of those older rams are to a herd, but do know the significance they have to hunters. More pressure is being placed on rams of a younger age class than ever before. Unless we reduce this pressure on young rams we will struggle to replace what few older rams survive each year to breed and provide hunting opportunity.

The argument that the older rams are "surplus" to the population has never been proven to be sustainable long term. The studies suggest that shooting FC rams has limited effect on sheep populations, but if you look at the long-term trend of harvest for rams over the last 30 years, it has declined lineally. What has been a constant in that time? FC regulations. I don't believe we truly fully understand if FC is having an effect or if its just the long term trend we are in and will continue to be in.

I am unsure what the best management course of action would be, however limiting harvest of young rams may be prudent. I implore the board to take action to reduce NR participation as a first step (45% of all rams), and a second step to somehow limit the harvest of young rams.

Regards

Ivan Clark



PC14

Submitted by: Aaron Colburn

Community of Residence: Eagle River, AK

Comment:

I propose the state implement sheep draw hunts for all State, BLM, and Private lands for nonresident hunters or place a quota on general season sheep hunts in all for GMU's for nonresidents. The Board of Game should consider removing all 3/4 curl or less hunts, making them all full curl, double broomed or 8 year old plus hunts. Remove all sheep hunts where the taking of ewes is legal. A hunter (resident & nonresident) who harvests a sublegal sheep shall not be allowed to hunt sheep for 4 years. A nonresident sheep hunter who is successful shall not be allowed to apply for a sheep hunt in the state of Alaska for 10 years.



Submitted by: Scott Collins

Community of Residence: Anchorage, Alaska

Comment:

I've hunted dall sheep in Alaska since the early 1990s, as an Alaska resident on personal hunts. During that time, I've observed long-term declines in sheep populations throughout much of the state. During the last few years that decline has become more significant in portions of the state, particularly the Western Alaska Range and Brooks Range (those are the areas I'm most familiar with). These declines are primarily due to hard winters/springs that have resulted in fewer sheep on the mountain currently. These types of declines have occurred in the past and are a natural part of the cycles of game populations. Full curl regulations are effective at continuing to allow the opportunity for hunters to pursue sheep without significantly effecting the long-term sheep population. I strongly encourage you to look past the near term reduced sheep population and maintain the opportunity to hunters to pursue sheep. In particular, resident hunters should continue to be able to hunt sheep every year under general season harvest tickets in all areas where that is currently allowed. Putting more of the state to draw permits will crowd hunters in the remaining areas that can be hunted without a draw permit. Putting the entire state under draw permits for sheep will unnecessarily limit sheep hunting opportunity and have little benefit to the long-term sheep population.

Should the BOG decide that sheep hunting pressure needs to be limited, I strongly recommend existing resident hunting opportunity be preserved under general season harvest tickets with the opportunity to hunt sheep every year and non-resident hunting be limited to drawing tags in part/all of the state. In accordance with the state constitution, non-resident hunting opportunities should be limited before resident opportunities are limited. In addition, in some areas of the state, non-resident hunters account for more than 90% of the sheep harvest, so limiting non-resident hunting is required to reduce hunting harvest while resident hunting opportunity can be preserved with minimal impact to sheep populations. Demand for non-resident sheep hunting is virtually unlimited with popularity continuing to increase. In those areas of the state without sole guide use areas, non-resident draw tags are an effective method to limit non-resident harvest to sustainable levels (similar to black bear draw tags in Southeast AK, while residents hunt under harvest tickets).

Thank you,

Scott Collins

Anchorage, AK

**PC16**

Submitted by: Shawn Davis

Community of Residence: Fairbanks Alaska

Comment:

To ADF&G Board of Game

As far as regulation solutions to sheep hunting in the state of Alaska, it is very simple. When there is a population concern in a certain game unit, we need to not give out any harvest tags to out of state residents before completely canceling all sheep hunting to Alaska resident's and out of state residents in those game units. Ultimately we as a state need to implement all Dall Sheep hunting for out of state residents to a lottery for a total of 10% of the overall harvest. No different than all the other Western States. I have been fortunate to have chased sheep in Alaska for over 2.5 decades and have had some of the best days of my life in the field with my wife and good friends spending time with sheep and harvesting sheep. 2 seasons ago we started taking my long time sheep hunting partners son on the youth hunt. Now mind you, my partner and his son are both Alaska born and raised and it would be a crying shame if the young Lad had to start putting in for a lottery for all Dall Sheep hunting in Alaska because of poor policy choices made over the years to cater to out of state resident hunters and the guiding industry. This also applies to Kodiak Brown Bear, Nunivak Island Muskox, Mountain Goat and coveted moose tags around the state. As appointed board members to our game board, I trust in you to make proper decisions concerning our sheep management decisions to give Alaska residents preference when a need comes to limiting harvest numbers in a certain unit and really in the overall harvest number.

Thank you for taking the tome to look over and consider these straight forward and simple solutions to help in our sheep population and management issues.

Shawn Davis

**PC17**

Submitted by: Eric Eckard

Community of Residence: Wasilla, Alaska

Comment:

Our sheep population is a very bad way. We need to take a good look into how we a managing this population. There come up with a system that allows the sheep to build back there #'s.

1. Non resident, 1 sheep every 10 years
2. Road access sheep areas ALL DRAW. units,
- 3 Establish a min legal population for areas , closed areas to hunting if they fall below that threshold.

4. Weighted point system for a legal ram by age for # of years before you can harvest a sheep again. 6 years old/5 years, 7years/4years, 8years/3years, 9years/2years, 10yers+/next year. This would give us a healthier population and better allow our rams to breed stock.



PC18

Submitted by: Kolton Eischens

Community of Residence: Big Lake, Alaska

Comment:

Couple ideas:

- no ewe tags anywhere
- full curl only tags no “any ram” tags
- quota hunts for each subunit having a educated number of sheep that can only be harvested and then an emergency order closure
- NR can only shoot 1 ram every 6-10 years
- R can only shoot a ram every 2-4 years
- if the resource isn’t sustainable to have guides taking rams limit them before limiting residents, for example if Guide A normally brings 8 hunters into area and harvest 6/8. Drop that to 4 hunters, start charging double for guided hunts (stone sheep and others are way more than what dall sheep hunts go for) now the guides are making the same money and less rams being taken. These guides say they are “booked until 2025” perfect charge 40k instead of 20k the rich folk in the hunting industry will pay it and they will still be booked

Just thoughts. Looking forward to hearing and hoping something gets done or there is a plan going forward. Thanks for all you all do for us sportsmen/women



PC19

Submitted by: Jacques Etcheverry

Community of Residence: North Pole,Ak

Comment:

Good evening board members.

I like many others spent a great amount of time this fall searching for a legal ram and while I did not find one I saw promising numbers and urge you to leave all hunts as they are and not implement hunting restrictions.

Thank you for your time



**Fairbanks
Fish & Game Advisory Committee**

**Interior Region
Fish & Game Advisory Committees**

Central	Middle Nenana River
Delta Junction	Middle Yukon River
Eagle	Minto-Nenana
Fairbanks	Ruby
GASH	Stony Holitna
Koyukuk River	Tanana-Rampart-Manley
Lake Minchumina	Upper Tanana Fortymile
McGrath	Yukon Flats

October 13, 2022

To: Board of Game

Re: Dall Sheep Informational Meeting

Dear Chairman Burnett and members of the board,

The Fairbanks Fish & Game Advisory Committee met on October 12th for a regularly scheduled meeting and voted 7-4 to send this letter below:

With Dall sheep across the state in severe decline, and proposals to shut sheep seasons down completely in some areas, along with more recent federal closures to sheep hunting, the Board of Game needs to address the issue of unlimited nonresident sheep hunting where it occurs to protect our sheep resource and resident sheep hunting opportunities.

Before any new restrictions or limits are put in place on resident sheep hunters, if there is unlimited nonresident sheep hunting in those areas, it needs to be restricted or limited as a first step.

Should any sheep hunting closures take place via Board of Game actions, the board needs to ensure when it opens again to sheep hunting, nonresidents are restricted or limited,

Mark Richards – acting Chair



PC21

Submitted by: Chase Ferris

Community of Residence: Palmer, AK

Comment:

I personally would like to see a shift in tag allocation to benefit the resident hunters instead of benefitting guides. If we are trying to increase sheep populations, wouldn't it make sense to limit out of state hunters before having to turn all areas into a draw tag or shutting them down completely. If we limited the number of non residents in all areas, who have the highest success rate of all sheep hunters in Alaska, we may be able to gauge if further action is needed.

Also, it would be beneficial in my opinion to turn all units into guide concessions and limit the number of guides in a particular area, much like the concessions in federal reserves. Nothing worse than having multiple guides in a single chunk of ground who have the time and resources to scout sheep from June through July.

As a resident who thoroughly enjoys hunting sheep, I hope for the longevity of sheep hunting being over the counter for residents. At our current trajectory it will not be as our system is beneficial to guides and not resident hunters.



PC22

Submitted by: Paul Ferucci

Community of Residence: Anchorage

Comment:

I'm 54, born/raised here in this great state. This was my 13th consecutive year sheep hunting in Alaska. I feel lucky my son was able to harvest a ram after three previous unsuccessful seasons. It is clear to me, mature ram density is declining, I don't know all the reasons why, nor does anyone. I am concerned future generations are not going to have the opportunity that I have had and my children have had.

I'm in support of restricting the number of hunters in the field state wide. Something should change in that regard now, not 5 or 10 years from now. I'm in favor of residents harvesting one ram every 4 years, out of state hunters one every 10 years, or going to a draw state wide if out of state residents are limited to 10-15% of those tags. Other options to consider would be creating more weapon restriction hunts such as archery only.

Sincerely,

Paul Ferucci

Anchorage



I am a lifelong Alaskan, avid hunter of sheep and other big game species since about 1992, and currently split my professional obligations between working as a rural family doctor in Kotzebue and guiding backcountry skiing out of Girdwood. I have spent most of my life in and around sheep country in Alaska.

I have three primary points that I'll list here and then expound on below:

- 1) **Climate Change** is real, caused by human activity and is not going to reverse itself and it's negative affects on Dall Sheep in Alaska. We must address management with this in mind, and not defer to "weather events" that will "go back to normal".
- 2) As sheep populations decline, I keep hearing and reading about the possibility of closures or going to draw hunts. Why not just **make the hunting more challenging by limiting methods of take** or scouting instead of drastically decreasing hunting opportunity. Creating archery, muzzleloader or other weapons limited hunts could accomplish decreased take, increase of legal rams with no decrease in hunter opportunity. (No one is a born a "bowhunter" and any hunter is capable of learning archery or other more primitive weapons.)
- 3) We must limit **Non-resident harvest** before that for resident hunters. I do not know of anywhere else in North America where non-resident (guided) hunters are allowed to take more than half of the total harvest each year. There are many areas in Alaska where this is the case and even where resident harvest is higher, non-resident take is still proportionally very high (upwards of 40% across the state). This is anathema to our state constitution and flies in the face of the reason many of us have chosen to make Alaska home.

Explanation:

Climate Change:

Practically every scientific organization on the planet (including IUCN of which WSF is a member and the Wildlife Society), national government, insurance company and financial institution on the planet has accepted that **Climate change is happening, is caused by humans, and will significantly worsen unless drastic action is taken.** Peruse the site of any wildlife or other scientific organization in the world and you will find a similar statement.

Meanwhile, every biologist I have spoken with (and there have been many) has recognized this as the primary issue with our sheep population in almost every circumstance of decline and mountain range. Similarly, at every board of game or ADFG discussion I've attended, there is constant talk about "weather events" but few, if any will acknowledge that this isn't some transient issue.

Why does this matter for the decisions made by the BOG and ADFG? Management decisions must be made with the understanding that the climate and weather patterns in Alaska (or anywhere else on the planet) are not going back to "normal". We must plan for continued weather events that hurt sheep such as rain on snow events, deep wet snow and massive vegetation changes that are already being observed and directly linked to sheep survival (see the work done by ADFG (including presentation from 2017) showing the connection between Chugach sheep population and changing vegetation.

We must manage sheep populations with this in mind and cannot keep talking about when things go back to “normal”.

2) Management by weapons restriction, not draw hunts

Whenever the topic is raised of managing declining sheep populations the specter going to draw hunts is raised. This has already happened in the Chugach and I know there have been discussions about doing this on the Kenai and in unit 19. Even worse, we’ve recently seen a complete closure in part of the Brooks range because of concern that hunters were effective enough to harm the sheep population.

It’s also well understood that because of rifle technology, GPS and internet information, and the use of aircraft for aerial spotting and undeveloped landings, many sheep hunters (particularly outfitters but some residents) have become very effective at killing sheep. Anecdotally, the vast majority of rifle hunters I know state that the only challenge is finding a legal ram. Once a legal ram is identified most hunters I know claim a very high kill rate.

It’s also worth noting that the overall harvest of legal rams has remained relatively steady despite the overall decline of the sheep population. To me and others this suggests that we’re consistently killing a larger percentage of a declining population.

Going to a draw hunt or, in the extreme example, shutting down areas completely have multiple adverse affects. First and foremost, it greatly decreases the opportunity for people to go hunting. In current areas with draws most of us can only hope to draw a tag once or twice in our lives. Second, if more areas go to a draw, that will increase hunting pressure in the ever fewer general season hunting areas thus increasing pressure on sheep populations and decreasing hunter enjoyment.

Why not just go to some weapons limited hunts? If areas of concern changed to archery only, for example, everyone who wanted to could still go hunting but the overall impact on the animal population would be greatly decreased. Based on fish and game statistics archery hunters for sheep have a small fraction of the success rate of rifle hunters but still have all the excitement and adventure associated with sheep hunting.

Even in easily accessible Eklutna where there are 26 tags per year (and then another 40 for the late season) for **any ram** there still remains a robust population of mature rams year after year providing an excellent hunting experience for anyone who draws the tag. And yes, Eklutna is managed by draw but based on the low success rates demonstrated by hunters in that tag, it seems very reasonable to expect that in a larger, much less accessible general season hunting area and a full curl only requirement, the harvest would be very very small while still giving everyone the opportunity to pursue sheep hunting. Skilled and lucky hunters would still kill a few rams each year but overall the impact on the population would be very low. The extended observation period afforded by bowhunting at close ranges would also likely decrease the number of borderline and sub-legal rams being killed.

And to preemptively address a counter-point that will likely be brought up here that “there is no evidence that decreasing ram harvest helps the population”, isn’t decreasing the ram harvest the whole point of going to a draw hunt?

This would also not be a novel approach. In Alberta there has been a long standing “Bowzone” for Bighorns that has proven popular with hunters, biologists and other local land stakeholders.



Similarly, there is an archery only stone sheep hunting area in BC called Todagin. These hunts are popular.

Archery has been used a management tool to decrease harvest while maintaining opportunity all over North America for many years. It's time we consider it for sheep in Alaska.

If populations or hunting pressure is getting to the point where a draw or closure is being considered, please choose weapons restrictions instead of dramatically limiting hunting opportunity.

Similarly, **we should eliminate all aerial spotting** of sheep both in-season and out. This would decrease aerial harassment year round and make hunting a little more equitable and come close to something that actually resembles "fair chase" that so many hunters espouse. There is simply no way to argue that spotting a sheep from the air and then shooting it, especially with a rifle, a few days or weeks later, is in any way a fair chase or ethical pursuit.

If we make sheep hunting a little bit harder hunters and sheep will both benefit. Since when are sheep hunters afraid of something that is actually challenging?

3) Non-Resident harvest:

It's no secret that in Alaska the guided non-resident hunters have very high success rates. This information is easily accessible on the ADFG site and demonstrates that in some areas non-resident hunters have greater than 70% success rates and many guides state in their marketing that they have "100% shot opportunities" many seasons. In addition the overall portion of the harvest by non-residents is upwards of 40-60% in many parts of the state.

I have never heard of another area in North America where there is unrestricted take by non-residents but that is what we have on state owned lands in Alaska. Even in federally managed lands where there are quotas put in place, the number of rams allocated often equals or eclipses the take of resident hunters in the same areas.

Just for one example, in 2021, non-residents killed 203 sheep while residents killed 283. That means that non-residents killed 42% of the total sheep harvested. There is nowhere else in North America where regulations allow this on a state or province wide level. It's also worth noting that for those who hunted in 2021, non-resident success rates was 48% while residents were at 17%. This makes it clear that reducing opportunity for non-residents will be much more effective at decreasing harvest.

(There is the argument that this bring money into the state but I would argue that the money from 500 or so non-resident sheep hunters, once distributed to a handful of outfitters and guides (many of whom are non-residents themselves) is a relatively small contribution to the state economy when compared to the total money contributed to the economy by the remainder of resident and non-resident hunters during.)



Before any limitations are made to resident hunting opportunities, we must decrease the non-resident harvest. Allowing non-residents to continue harvesting such a massive proportion of our sheep is unsustainable.

Some thoughtful, area based, restrictions on non-resident harvest is truly the "low hanging fruit" of sheep management and, along with weapons restrictions, should be the first steps considered before otherwise limiting hunter opportunity when adjusting to declining sheep numbers.

Paul Forward
Girdwood, AK



Submitted by: Colt Foster

Community of Residence: Eagle River, AK

Comment:

As a lifelong Alaskan I've hunted sheep throughout the state for 33 years while being very selective on which rams to harvest. It saddens me to see the low numbers of sheep overall especially lambs and mature rams. Any avid sheep hunter has seen this steady decline for years and I urge the board to take action before the entire state is forced to be on drawing or worst, shut down! Full curl management has worked well for many years and I think it will continue once we have more of a surplus of rams. Unfortunately right now we have very few rams in the 8-11 year range so lots of young rams or barely legal are being shot. This is why the sublegal harvest is on the rise and probably should be an even higher number. I can't help but be frustrated seeing pictures of dead rams that were given warnings instead of citations. Especially when my group of hunting partners are actively passing on younger legal rams to help the resource. This year I had to explain to my 11 year old daughter why she should pass on a ram and then later saw a picture of it dead. We need some mature rams to do the breeding and to lead the herds to better feed or to avoid predators. I feel like the burden of selective conservation can't all fall on hunters like me, and something needs to change before it's too late for everyone. The most immediate change needs to be to restrict the unlimited nonresident hunting pressure. This has gone on way too long and if allowed to continue will push us to major long term issues including a statewide limited drawing. This is what has happened to most of the western states with limited entry species such as bighorn sheep, desert sheep, goats, shiras moose along with high demand elk, mule deer and pronghorn tags. Nonresidents of those states are limited to 10% of the allotted tags. It's shocking that we are still allowing unlimited nonresident hunters for the majority of Alaska when the sheep population has dropped so low. Nobody, resident or nonresident, wants to see Alaska go to a statewide limited drawing. Please make some changes while we still can.



Submitted by: Steve Gabrielsen

Community of Residence: Fairbanks, AK

Comment:

1. Alaska's sheep are a valuable and iconic natural resource of the State. This renewable resource needs to be conserved so that future generations are able to enjoy hunting & viewing these magnificent beasts.
2. In keeping with the state constitution it is the duty of the BOG to make rules and regulations that conserve this natural resource, In particular Alaska residents.

This means, that any alterations to hunting opportunities should be made in a manner which favors and gives preference to residents, over non-residents.

3. In light of declining sheep numbers across the state swift action, grounded in scientific based best management practices supported by ADF&G, is needed to curb population declines and reestablish sustainable harvests.



PC26

Submitted by: Brett Gibbens

Community of Residence: McGrath, AK

Comment:

The McGrath Advisory Committee is extremely concerned about the dire status of the sheep population in Game Management Unit 19. We support a 5 year closure to sheep harvest by all user groups, both resident and non resident. While we understand that the "full curl" management strategy is widely accepted, and also that there are many factors adversely affecting this sheep population besides human harvest, we believe that the one factor we can help control would be to shut down human harvest in an effort to allow more rams to reach maturity and allow for breeding by large mature rams. During this closure period, we would also support continued efforts to get surveys done of the population in the area, which have been problematic for several years due to weather., as well as a serious discussion about predator control of wolves in Game Management Unit 19C, as has been effective in other parts of Game Management Unit 19 for rebuilding struggling ungulate populations. We all need to make an immediate effort to salvage this rapidly declining population and help ensure that the future of GMU 19 will include a healthy sheep population. Further, we believe that the sheep numbers are so low and the population so dire, that we request action as soon as possible, rather than waiting for the normal cycle for our region.



PC27

Submitted by: Karen Gordon

Community of Residence: Fairbanks, Alaska

Comment:

At present there is no need I can see for Board action at this time. Here's why:

We don't know that the declines in sheep populations are statewide at this time.

The full curl regulation protects populations from overharvesting of rams.

There is little that can be done to speed recovery unless predator control is done.

Hunter success remains high because few hunters go out when they think populations are low.

If there turns out to be a significant problem other than nonresident funding being low, the Department should submit proposals for the Board on schedule.

I broke my finger today, and am unable to send a comment so I have asked a friend to send this in for me...Karen



PC28

Submitted by: Steven Hallenbeck

Community of Residence: North Pole, AK

Comment:

#1 Close ALL Non resident sheep hunt opportunities in GMU 19c and 20a IMMEDIATELY.

#2 Implementation of statewide draw for non residents on all STATE LAND where currently there is zero controls on this limited resource. Limit non residents to 10 percent of previous year of successful hunts. This year for example would be 40 non resident permits available statewide on AK state land. (we had 399 successful sheep hunts this year combined non resident and resident)

#3 Implementation of registration for all resident hunters in all unlimited harvest ticket hunts.

These three suggestions are required for the ever decreasing legal rams that are currently available. The “we only harvest surplus rams” argument is NOT WORKING and unless we get in front of the limited harvestable rams we will continue to have hunter conflict. Residents MUST have the first priority and it is plainly obvious this resource can’t sustain current BOG ignoring this problem AGAIN.



PC29

Submitted by: Nathan Hannah

Community of Residence: WASILLA

Comment:

To Whom it may concern,

I am taking this opportunity to express my concerns and get my recommendations on the record in regard to sheep hunting in Alaska in its current state. ADFG is reporting continued declines in population across most mountain ranges with the Federal Wildlife Service echoing much of the same for their controlled lands. My own experiences in the field this fall along with multiple reports from other experienced resident hunters confirm. While there are many contributing factors and potential solutions that can certainly be debated most everyone agrees the majority of the issue is the weather and is largely out of our control. What is not out of our control is harvest management of hunting. If the resource is limited it is time to limit the take. Non-resident hunters do and always have taken more percentage of the annual harvest and must be limited. I would propose a multi-prong approach to setting the priority of a limited resource back to the residents of Alaska and in return taking less sheep off the mountain. First is a new requirement for all AK registered Big Game guides and Assistant Guides to be verified Alaska Resident. If you don't get a PFD you shouldn't be able to work in the guide industry in Alaska. No exceptions. Second would be to move Non-resident to at least a one every

four years bag limit or draw only. This would keep the Resident Alaska Guides in business without affecting their livelihood. Third would be to increase Non-Resident Tag fees considerably and add a \$25 or \$50 Resident stamp to help make up the revenue difference. The stamp would go directly to sheep management and not the general fund. Lastly in areas identified as at-risk would proceed to limit Non-Resident to Draw only and then further to eliminate Non-Resident sheep hunting altogether before affecting Resident opportunity. This aforementioned process to be required as law. With sheep populations suffering, this restructuring of the guide industry regulations in Alaska and prioritization of its residents would without a doubt leave more sheep in all ranges of Alaska. When considering what is actually in our control this is the most sustainable plan to ensure future hunting opportunity for all while being fair and just to the folks that actually contribute to Alaska's economy and communities.

Kind Regards,

Nathan Hannah



PC30

Submitted by: Drew Hatter

Community of Residence: Anchorage, AK

Comment:

Just wanted to write and say I am onboard with the proposals and stance of RHAK (Resident Hunters of AK) concerning this issue. I believe they have already submitted a letter outlining their stance. Thanks.



PC31

Submitted by: Wayne Heimer

Community of Residence: Fairbanks, Alaska

Comment:

October 11, 2022

Board of Game:

Please be aware you may be being manipulated by special interests which are not in accord. These special interests will use their self-defined "sheep crisis" to promote their specific goals, even if it means disadvantaging others.

Alaska's Dall sheep have been through low population cycles before, and will probably recover in time. According to at least one published USGS study, Dall sheep populations "bloomed" during the period of maximal glacial recession in Alaska. If so, this would explain high population numbers up to the early 1990s and beyond.

If the Board feels compelled save sheep hunting (actually the ADF&G Commissioner's responsibility), the Board's options include facilitating radical predator control to benefit sheep and arguing for opening closed federal lands to full-curl ram hunting over the period it takes for sheep populations to recover. Pursuing both would be the most effective way to cope with the present challenge, but would represent a departure from established practice and social tradition.

If the Board chooses to take no action, hunters will likely "self-limit" as they have done in the past with ANILCA and other local losses in hunting opportunity. If the Board does not choose to be immediately proactive by adjusting predator harvest methods, means, and bag limits (facilitating predator harvests to benefit sheep) and advocating for opening of National Park Service lands to mature ram harvests, I think prudence suggests waiting at least one year to see what happens with hunter numbers.

No adjustments to seasons and bag limits or specific allocations are likely to be biologically effective in making more harvestable rams.

Wayne Heimer from Fairbanks



PC32

Submitted by: Jerry Herrod

Community of Residence: Anchorage, Alaska

Comment:

Proposal For "Buffer Zones" In High Hunter Use Areas Of 13A ATV Access- Creating Archery Only Areas or New Draw Areas For Areas Along Glenn Highway High Use ATV Access.

There are numerous high use areas of 13A that are accessible by ATV users. These areas see extremely high pressure during sheep season and oftentimes multiple people are stalking the same ram(s).

Particularly, the areas of very easy ATV access include Buffalo Mine area, Eska Mountain, Kings River, Caribou Creek, Chickaloon River, Boulder Creek, Purinton Creek/Anthracite Ridge, Syncline Mountains. All of these areas appear to hold numbers of sheep that can support future numbers of legal rams and some rams are present throughout these ranges.

However, with the fewer numbers of sheep in general and recent years of hard winters in the Talkeetnas, the availability of legal rams is few and far between and the constant ATV Hunter access and pressure has done nothing but diminish the opportunities to have available legal ram surplus.

Although the area has historically enjoyed a reasonable rate of harvest, it's not sustainable considering hunter use and ATV access increases yearly. The area just on the other side of the Glenn Highway, Unit 13D, is currently a draw area and offers a true opportunity for hunters to harvest genuinely mature rams.

I have spent many seasons hunting 13A from the Glenn Highway access points and a person can simply look at any trailhead during hunting season and see dozens upon dozens of trucks and trailers and ATV's parked at any one of these access points into 13A. The pressure is obvious. In many of these areas ATV users will "cut trail" and create their own new trails off of the main routes and cut

through the alpine tundra land, permanently scarring the land and creating nothing but quagmire. These new “cuts” into the alpine tundra are often leading up and into sheep territory. This “trail cutting” may be a separate issue on its own but, the added pressure is there no doubt on sheep.

While every single individual at every trailhead may not be hunting sheep at the same time, a good number of them will add a sheep tag to their billfold and set forth into the hills.

Simply put, too many can access the very few rams in these areas too easily. The rams never have a real chance at maturity. The area certainly lends itself to having good habitat for sheep if the pressure could be alleviated.

There are some who will argue that this area is not a place that would develop large mature rams and the genetics are poor but the facts are there in harvest data for anyone willing to look it up.

These types of areas would be ideal for buffer zones that would be draw only areas or if the board would consider making archery only areas.

Proposal For Sub-Legal Harvest Penalty (In Addition To Current Fines Under Statute)

Residents - If a ram is brought to sealing and is found to be sub-legal; upon conviction that hunter will not be allowed to hunt sheep for 4 years. If that hunter subsequently brings in a second sublegal ram they will lose their opportunity to hunt sheep indefinitely upon a second conviction.

Non-Residents - If a ram is brought to sealing and is found to be sub-legal; upon conviction that hunter will not be allowed to hunt sheep for 8 years. If that hunter subsequently brings in a second sublegal ram they will lose their opportunity to hunt sheep indefinitely upon a second conviction.

These penalties would coincide with other penalties listed in the violation; fines, seizure of gear etc.

Sheep hunting has become more popular than ever before due to social media and everyone wanting to be a "hardcore" mountain hunter. Along with this comes individual's desires to absolutely have to kill a sheep. If the penalties were harsher, then it would give hunters a great motivation to ensure a mature ram harvest and not to shoot marginal rams or rams that would have definitely been legal the following season.

Rams should not be harvested because someone felt "it looked big" or "it's close enough isn't it" or "well gee whiz, I thought it was 8 years old". This isn't merely anecdotal, as ADFG sees more and more sub legal harvest every year and those are documented numbers.

Create more "archery only" areas under registration tag or draw areas. Currently archery hunters take a backseat to the unrestricted hunting seasons.

More archery only areas would allow for the sheep to have a chance at coming back in numbers along with still providing hunter harvest opportunity in areas like the Kenai Mountains, in one specific example.

Also dividing the DS141 hunt into two separate seasons. Hunters often hunt on top of each other and the current hunt may not provide a quality fair chase pursuit. separating the hunt into two seasons would alleviate the pressure.



PC33

Submitted by: Pete Imhof

Community of Residence: Wasilla AK

Comment:

Where do we start, first we all acknowledge we got a sheep population down turn that none of us have ever seen, sheep need our help now, there's areas in Alaska that can't afford one more bad winter or there completely gone. So how and what can we do, look at salt and mineral licks, call biologists in the Yukon and ask about the big 9 area, it works, lamb ewe ratio is superior to adjacent areas, secondly Predator control, then we need control burns to regain winter habitat in certain regions. If it's funding we're lacking I would think the wild sheep foundation would help. I personally think we're in a situation thats going to require transplants to assist in the recovery in certain areas. we also need to think about complete closure for a few years, that will reset the clock on killing young and sublegal rams, then come back to the starting line with allocations for the guiding industry and a draw system for non residents, residents will also have to except some sorta of restriction, 1 in 4 etc. Remember one thing in my rambling, it's about our sheep that need help now, we can't afford to wait on the polical food chain... thanks for reading.

<https://www.facebook.com/groups/587724652038357/permalink/1171124287031721/>

Please read comments from a post I made several months ago. Thanks



PC34

Submitted by: Dan Jirak

Community of Residence: Wasilla

Comment:

Please consider limiting nonresident hunters in areas that are having severe population declines and nonresidents take the vast majority of sheep.(80-90% in 19c) 19c and 20a are the main areas of concern. Please do something before we are all on a draw system statewide



Submitted by: Gabriel Juliussen

Community of Residence: Kenai, AK

Comment:

I'm a lifelong Alaskan resident and I've been hunting Dall Sheep in the Alaska Range since 1995. In 2014-2016 I took my daughters on successful hunts in this same area.

I understand the current concern about low sheep populations. I also understand that most of the sheep taken in Alaska are guided non-resident hunters. I strongly believe that this resource should be available for Alaska residents. I've encountered numerous guided hunters over the years. I believe the Board should reduce the number of guides to ensure this valuable resource is remains available for Alaska residents to hunt each year with a harvest ticket, and not have to rely on drawing a permit.



Hello, my name is Grant Kopplin. I am 27, live in palmer Alaska and have been an avid sheep hunter for the last 5 years and will hopefully continue to hunt sheep for as long as I can. In the short five years I've been hunting sheep, I have noticed a significant decline in sheep numbers in the Alaska range and northern Wrangell mountains where I hunt. These declines are no secret and it sounds like all mountain ranges are experiencing the same thing.

I understand that fluctuations in sheep populations are natural, and these declines can mostly be attributed to weather, but it seems we've reached a very significant bottom in numbers and I believe its time for the BOG, ADFG, and the state to step in and actively manage our sheep. It seems that these nasty, wetter winters, with freeze thaw cycles are becoming more common and I really think ADFG needs to be looking at all options to help these sheep get through these winters. Below I am going to just bullet a few points and ideas I hope you all will consider and research.

- Predator management – I understand that weather is mainly to blame for the declines, but predators no doubt are taking a toll on sheep as well. especially when they are so weak and vulnerable from the winter weather. This is the one factor that we can control and influence and I beg the BOG and ADFG to utilize the tools and methods we have to better control predators to allow our sheep populations to recover. I understand predator management can be controversial to those who do not understand actual wildlife management but I ask that you ignore their ignorance and listen to science and do what is best for Alaskans and our wildlife
- Supplemental feed program – I understand this isn't as simple as dumping hay in the mountains, but is there not a safe and effective way to supplement feed and minerals for sheep in the winter? Sounds like these during these nasty winters the feed they depend on becomes very difficult to access causing poor nutrition and higher mortality. So, is there any way we can harvest vegetation in the fall and spread in the mountains during the winter when they need it? Or pellets? Or at least put mineral licks throughout the winter range to help them? I really think this should be researched and could be a potential tool to help our sheep get through the winter.
- Cost – I understand these things take money, and the state isn't exactly just forking over money to ADFG left and right. As a resident sheep hunter, I fully support having to pay for a locking tag to help raise money for sheep research and management. I personally feel comfortable paying \$100 for one, knowing it goes back into management. But maybe something more like \$25 or \$50 would be more reasonable? Whatever you decide. but I support paying more some how to help fund sheep research and management. I'm sure the nice folks at wild sheep foundation would love to spend some money on some new predator management and supplemental feed plans as well! I am also willing to bet there are a few resident pilots and guides who will gladly assist in any operations to help improve our sheep numbers. I know I will! I do not fly, id volunteer somehow though!
- Education - maybe create an sheep judging class or video that people must watch or attend before going afield to better judge sheep to help with the sublegal take. I would be ok with doing it! As sheep hunters we should be striving to harvest the oldest rams we can and that should be stressed in the video or class.

Next, I want to talk about allocation, or the changing of our current system for hunting sheep. From everything I've ever heard, and from what I hear from our folks down at ADFG, the full curl



regulation is about as conservative as you can get for harvesting rams. So by harvesting only 8 year old (or older) rams or full curl rams, we are leaving enough breeding age rams on the mountain to satisfy all the breeding requirements for the ewes. Ensuring that the next generation is still brought in at maximum capacity. So in theory, harvesting a mature 8 year old or full curl ram, wont have an effect on the future population growth. If the BOG and ADFG still holds this to be true, then I don't think we need to change any of our allocative regulations. I remember hearing about how in the 1980s we had similar decline in GMU 20a and they decided to leave it to a harvest ticket hunt and wait for it to rebound. It rebounded just fine being an open area still and was near record harvest again until just recently. So it seems like the system we have in place works and I think its important to still leave as much opportunity to hunt as we can for people. That should be the goal. Changing things over to a draw system vs harvest ticket just because times are slim isn't actually changing or improving what causes the declines in the first place.

If ADFG, the BOG, and the public no longer believe that the unlimited harvest of full curl or 8 year old rams in harvest ticket areas is not having an effect on population growth, then I understand that further restrictions may need to be put into place. I understand this is controversial. but I want to say that any restriction put on resident opportunity should not be done without also limiting non resident hunting opportunity. At the end of the day the residents should be the priority and have the majority of sheep allocated to them because it says so in our state constitution. I ask the BOG, as fellow Alaskans, and the keepers of our wildlife, that you please keep this fact in mind and think of your fellow statesmen and women first while making decisions. Below is one last point and idea I wanted to throw out there.

- State concession areas – I think this needs to happen. The fact that there is unlimited guiding on state lands is crazy. I do think when a guide has a concession area, he or she is more likely to take care of it and kind of manage their own area better. Where as currently an infinite number of guides can all be competing for a limited resource on state land, hunt it out, then move onto the next area and do the same thing.
- for a potential allocative option for residents vs nonresidents I had this idea I thought was very fair. All areas that are open to sheep hunting with a harvest ticket would remain open to residents, but Residents would go to one sheep every four years like brown bears in unit 8 and 9. Nonresidents would go to a state wide draw system and the number of tags allocated would be 20% of the state wide historical sheep harvest. So for example if the total sheep harvest averaged 400 rams over the last 30 years then there would be 100 draw tags available state wide for nonresidents. Those tags would then be divided up amongst the different mountain ranges accordingly. maybe based off historical harvest percentage. And then nonresidents would apply for tags based off mountain ranges and if drawn could then find a guide in that area. I believe something along these lines is a very fair system where both sides are giving. I believe there would be less resident hunters afield and some residents would be much more selective and target older age class rams. Non resident pressure would also be cut down. I think something like this would allow more rams to reach mature age and improve the hunt quality for everyone. This system would ensure that residents still had priority to our resource but would also leave a very generous amount of tags to nonresidents. 20% is more than any other state and we would still be by far by the #1



state for nonresident sheep hunting opportunity. If need be, maybe even take an extra 5% off of the resident 75% for next of kin hunters? I clearly don't have all details hammered out but I do think we could come up with a very fair system like this that would satisfy all parties and help reduce harvest and pressure. Just an idea and I would be happy to work on it more. If you guys decide that there will be an allocative change maybe create another meeting in a couple months to allow for proper proposals and ideas to be submitted before making a final decision.

Thank you for your time and reading this. Feel free to email me or call me with any questions or comments.

Grant Kopplin

[REDACTED]

[REDACTED]



PC37

Submitted by: Travis Kuehl

Community of Residence: Wasilla, AK

Comment:

90% of our sheep are being shot by non-resident, guided hunters. The very few legal rams that we have left to hunt are being treated as a business opportunity for guides, rather than a hunting opportunity for residents. Please fix this. Thank you.



PC38

Submitted by: Zachary Larsen

Community of Residence: Globe, Arizona

Comment:

Please consider restrictions on weapon technology as a means to reduce success rates while keeping liberal opportunities to hunt. I support things like traditional archery seasons or units as a way to allow more people, more time afield while having minimal impact on populations, age class and population dynamics. Also, I have previously been a guide in Ak and will be back as a non resident and maybe a future resident hunter. Thanks for your efforts!



PC39

Submitted by: Michael Larson

Community of Residence: Eagle River, Alaska

Comment:

1A. Proposal to allocate more non motorized controlled used areas. In strategic areas determined by ADFG for improved sheep habitat and population.

1B. Proposal to limit commercial operations for sheep in controlled use areas to draw hunts only.

Create more areas that limit aircraft and motorized vehicle access during sheep season to combat the environmental stressors and hardships our current sheep population must already endure. Limit commercial operations for sheep in controlled use areas to draw hunts only and prioritize true fair chase opportunities for the middle class Alaskan resident.



Submitted by: Philip Latteier

Community of Residence: Eagle River, AK

Comment:

It is PAST time to protect the Dall Sheep!

Non-Resident hunters need to be limited!

ALL subsistence hunts must STOP!

There needs to be proactive action to help dwindled populations, such as the Western Brooks. 20+ years and NO recovery is UNACCEPTABLE

Money needs to be raised to research and implement these actions.

Locking tags for NON-residents need to be increased drastically- 100-1000%!!!

Residents should also have to buy a locking tag! charge according to need of funds.

Stricter rules for harvest of Sub-Legal Rams- increased fines, loosing sheep hunting privileges for multiple years!

Actions such as transplants from non-hunttable herds (nat'l parks, private), Habitat improvements- BURNS to create food.



Submitted by: Caleb Latteier

Community of Residence: Eagle River, AK

Comment:

Need to limit Non- Residents on sheep

Need to stop all subsistence hunts! No biological support at all

Need to proactively help sheep populations, like Western Brooks not just say- its the weather and do NOTHING like the past 20 yrs

Money to fund this can come from increased locking tags fees for Non-Residents AND actually add a locking tag fee for Residents! will cut down on opportunist sheep kills and create a new source of revenue for Sheep only. Increase fines for Sub-legal Harvest! make it a real penalty! And suspend sheep hunt privileges for years. Guides will also need to pay a substantial fine if a client kills a sub legal, maybe should be a fine as big as what they charged the client?? Yes!

Ideas for proactive action-

Habitat improvement! actively light fires to clear brush and create food, especially in winter range!

Transplant sheep from non-hunttable herds, Nat'l Parks, private lands. some areas may have numbers so low its not possible to repopulate otherwise.

Team up with NGOs to accomplish this- WSF, GSCO



PC42

Submitted by: Jerry Lees

Community of Residence: Fairbanks, Alaska

Comment:

Jerry Lees, Life long Sport Sheep Hunter.

I have been sheep hunting in Alaska for 43 years and I have deep concerns for the future of our sheep in Alaska. We all agree that our sheep populations are in trouble for a variety of reasons. We may not all agree on what those reasons exactly are, but we do agree that it has resulted in poor sheep populations in most areas of the state.

There are a variety of factors deemed responsible for their low numbers including back-to-back harsh winters with freezing rain events and late springs, depredation from Wolves, Eagles, and Bears, advancements in technology making it easier for humans to gain access to sheep, the over hunting of areas driven by the availability of over the counter sheep tags (in most areas) and no regulatory limit to the number of guides and air taxis operating in the state managed hunting areas, additionally some want to blame some decline on the supposed loss of feed / habitat from global warming which promotes the brush to grow farther up the mountains than any time in recent history. A lot of us old school sheep hunters don't agree with all these theories but none the less we have far less sheep to hunt than in any time period in my life. The word was out amongst sheep hunters, and many were and are choosing to cancel their hunts. We need to take immediate and effective actions to reduce our sheep harvests and provide an environment in which sheep can flourish. The first thought that comes to mind is that we need to regulate all non resident sheep harvest through the drawing permit system. Non residents make up more than half of our total state wide sheep harvest and as high as 70% in some hunting units such as units 14,16,26C. The guiding industry has been unchecked since the exclusive guide concessions went away back in the 80's. By implementing the drawn permit system for non residents we can then control the take by non residents which make up 80 percent of the guided hunters. They currently harvest over 50% of our sheep. We are required by our state constitution to restrict this group before all others. "Sustainable yields for the benefit of the residents of Alaska". We must reduce the negative impact that Non Residents are having on a very limited resource our sheep populations. I realize the state relies on the revenue from non resident hunters and I would propose raising the Non Resident tag fees on sheep to \$4000.00 ea. which is commonly found in other states with sheep populations. Guided sheep hunts are currently selling for around \$20,000. and a 20% tax via the tag fees is reasonable. Additionally I would like to propose That the number of non resident tags to be limited to 10% of the previous years harvest in any game management unit. Further I propose the consideration of resident Sport hunting sheep tags having a fee set to a minimum of \$100 so that resident hunters can help to better fund the ADFG budget and their voices would be heard by The Board of Game.



PC43

Submitted by: Erin Lester

Community of Residence: Anchorage, AK

Comment:

Hello, I'm a lifelong Alaskan, mother, lover of the outdoors and hunter.

I've recently become aware of the upcoming sheep meeting and wanted to express a few thoughts.

When I killed my the one and only ram that I've taken I shot its at 30 yards with my rifle. I know someone who has posed the idea of transitioning some areas of Alaska to archery only and I wholeheartedly would support that. Even as a relative novice, actually killing a sheep with a rifle is pretty easy once a legal ram is located and adding archery into the mix would be a fun challenge and also decrease the harvest while still allowing everyone to get out and hunt. I'm planning to buy my first bow this winter to start learning to shoot. I hope that Alaska will one day have areas that are exclusively for archery sheep hunting.

We also need to decrease the non-resident guided harvest. Guided hunters kill a huge portion of our sheep and if there are issues in the population numbers it only makes sense that resident hunters be given priority. We must start limiting the guide harvest in many parts of the state right now.

Finally, Alaska is changing rapidly due to climate change and based on everything I've seen and read, the sheep population decline is being caused, in large part, by anthropogenic climate change yet we almost never see those words in any official ADFG correspondence. Has politics trumped science when it comes to management of sheep?



PC44

Submitted by: Ernesto Lopez

Community of Residence: Eagle river Alaska

Comment:

I would like to see some measures taken by the BOG and ADFG to address the dall sheep issue. Such actions would be:

- 1). Accurate population counts across the state.
- 2) Active predator management during winter time when sheep are concentrated on wintering grounds and spring time during lambing season.
- 3) Restructuring of current seasons. Do we really need a 50 day season for HT sheep hunting?
- 4) Non resident quota on sheep. We are the only state to not have a quota on sheep.

5) Waiting period if you kill a sublegal ram. Currently if you harvest a sublegal you can hunt the next year. Have a waiting period in conjunction with a fine might help limit harvest of sublegals. Preliminary data for 2022 season is showing 10% sublegal harvest

6) Waiting period if you kill a 7 year old ram. The age class is lacking and taking a 7 year ram eliminates 1 of the 3 ways the ram can be legal pushing the envelope of sublegal. If you kill a 7 year old ram you sit out two years.

7). Stop believing rams 8 and older are surplus rams. How we can have any surplus sheep when populations are so low? We need healthy % of all age class represented

With only 400 rams killed this year to not address the issue before next season would be a failure of ADFG and BOG. If no action is taken at the very least we should line up all of ADFG and be able to kick them in the nuts.

Respectfully,

Ernesto Lopez



PC45

Submitted by: David Lorrington

Community of Residence: Fairbanks, Ak

Comment:

I request the Board of Game consider not changing the Full Curl Dall Sheep Management scheme.

I also request that the Board not to place any resident sheep hunter on a drawing permit system unless the Nonresident hunters are prohibited from taking Dall sheep first.

I understand that there are significant reductions in sheep numbers statewide and that the Board and the Department have management decisions that need to be made.

Thank you, Dave Lorrington, Fairbanks, Ak.



PC46

Submitted by: Michael Makar

Community of Residence: Anchorage,ak

Comment:

I'm a lifelong Alaskan since 1973 when my father moved our family to Alaska. We are hunters and rely on the bounty of the land to eat at our dinner table.

We are at a critical point for the Dall Sheep population as supporting data shows. There needs to be restrictions placed in all aspects of the hunting of Dall Sheep in Alaska.

First, Non-resident hunting needs to be restricted and greatly reduced. The current unrestricted non-resident hunting is not sustainable.

Second, I would like to see a limit of all non-residents to 1 sheep in a lifetime.

Third, resident hunters should be restricted to one sheep per person every 4 years.

I have watched the Sheep populations in Ak dwindle, and I ask you to make the correct constitutional decision and put Alaskans first

so that my children and grandchildren can hunt sheep in the future.

Thank You.

I'm a lifelong Alaskan since 1973 when my father moved our family to Alaska. We are hunters and rely on the bounty of the land to eat at our dinner table. I have hunted sheep every season (except 2 due to injuries). I guided as an assistant guide for many years and appreciate the industry and traditions. I earned my assistant license when I was 18 years old and great respect for the business However there must be a line in the sand where the resource (Dall Sheep) needs to recover.

We are at a critical point for the Dall Sheep population as supporting data shows. There needs to be restrictions placed in all aspects of the hunting of Dall Sheep in Alaska.

First, Non-resident hunting needs to be restricted and greatly reduced. The current unrestricted non-resident hunting is not sustainable.

Second, I would like to see a limit of all non-residents to 1 sheep in a lifetime.

Third, resident hunters should be restricted to one sheep per person every 4 years.

I have watched the Sheep populations in Ak dwindle, and I ask you to make the correct constitutional decision and put Alaskans first

so that my children and grandchildren can hunt sheep in the future.

Thank You.



PC47

Submitted by: Marty Meierotto

Community of Residence: Two Rivers

Comment:

Marty Meierotto, AK resident, hunter, trapper, pilot, and father to same

I have been hunting sheep in AK for over 30 years. I have never seen the sheep population so low in the areas I hunt. I have witnessed the decline for years. Much of the country is completely empty of sheep where once there were many. Particularly the 40-mile and Charley river country. Competition for the few remaining sheep is intense. I have quit hunting sheep.

We need to quit arguing about who has the right or pays the most to kill the last Dall ram in this state. All sheep supporters know what needs to be done. If you are swayed by special interest groups, personal gain, or the money trail, you are failing. This isn't a hunting issue, its the future of our sheep issue. Do something meaningful before it is too late. PLEASE



PC48

Submitted by: Joseph Mirasole

Community of Residence: Healy, Alaska

Comment:

Limit non-resident hunting in areas that show a decline of sheep population.

Engage with conservation groups for habitat improvement projects and population surveys. Use there dollars and volunteers.

Follow the North American Wildlife Conservation Model in making decisions.



From: John M Monnin

[REDACTED]

Utqiagvik, AK 99723

To: Alaska Board of Game

I am writing in regard to the Dall Sheep Informational Meeting October 19, 2022.

Our Dall sheep issues are many and complex. Overall we've lost perspective that our goals should be about the sheep and not the hunters. If sheep populations were good and harvest sustainable we would not be having this discussion. The sheep need to be the focus.

From the year 2000 thru 2019 we averaged 825 sheep statewide annually. In 2020 it was 627. In 2021 it was 487. This year through October 6th that number is 418. That data speaks for itself, in volumes. We are at all-time lows for harvest and all-time highs for confiscation and sub legal rams.....with over 40% of the 2022 harvest being five, six and seven year old rams. This is not sustainable, the full-curl standard is no longer an acceptable harvest criteria.

Many factors have led to this decline: bad winters, wet springs, low pregnancy rates, loss of habitat, predators and hunting. We aren't doing anything for habitat. We do virtually nothing to control predators. At this point our sole control is to control harvest. 2012-2014 saw very sub-standard lamb crops, which partially has led to these low numbers. The current lamb crops are worse.

We've already waited too long to be proactive....and we're realistically past the point of being reactive. It's time to shut down the sheep hunting completely and put together a large Working Group with all interests represented and make a tangible, sustainable, long-term plan. We cannot continue to decimate the resource while we make decisions on their survival.

If this Board doesn't act and act aggressively to reduce harvest significantly AND make a plan to protect and restore sheep populations, the Federal Gov't will shut down all federal land; which in turn puts ALL pressure on state lands. The Federal/State, love/hate relationship has impacted many things including sheep, it's a battle we cannot win and shouldn't have to fight. Let's make a plan to take care of the resource now and we won't have to.



PC50

Submitted by: David Moore

Community of Residence: Wasilla

Comment:

As per our state constitution these animals belong to us first. Quit giving them away to non-residents First. We can't put it any simpler than that.



PC51

Submitted by: Henry Munter

Community of Residence: Girdwood, AK

Comment:

Thank you for the opportunity to comment on dall sheep management in Alaska. I hope that as the effects of climate change increase stress on dall sheep populations that the board consider archery-only hunts as a management tool. I have had the fortune of participating in DS141. It's an incredible sporting opportunity, and a win-win for the joint goals of great hunts and healthy wildlife.

Thanks,

Henry



PC52

Submitted by: Ian Newman

Community of Residence: Eagle River

Comment:

The sheep numbers are extremely low and with the low numbers I feel that residents should have a priority over nonresidents. Alaska is the only state that does not limit nonresidents statewide.

Make the entire state drawing for all nonresident sheep hunter with a 10% cap on the nonresidents. Limit nonresidents to being allowed to hunt for sheep once every 10 years instead of 4 years.



PC53

Submitted by: Philip Nuechterlein

Community of Residence: Eagle River, Alaska

Comment:

If the board deems it necessary to limit hunting opportunities in the interest of preserving wildlife, please limit "elite/wealthy" hunting interests before you start limiting opportunities for the "man/woman of simple means".



PC54

Submitted by: Brian O'connor

Community of Residence: Wasilla, ak

Comment:

First off, thank you for your time. I believe our states dall sheep regulations should be changed in the following ways:

- Limit the number of guides for nonresident hunters. And/or limit the number of rams taken by a guide. The success rate of a guided hunt is very high.
- limit the % of nonresident tags issued for guided hunters
- Create a 1 ram per # regulatory years in zones with low ram numbers.
- Re-evaluate the hunting season length.

Thank you for your considerations.



PC55

Submitted by: Jacob Ohms

Community of Residence: Girdwood, Alaska

Comment:

With an overall decline in sheep harvest numbers throughout the state, something needs to be done.

Regulate guides and make a permit system for non resident hunters. Cap those numbers so no guide can overuse state land.

Cap the number of air taxi drop offs that each air charter can do.

If we go to draw in all units, it will hurt the resident hunter the most.

I've seen large numbers of rams over the past few years and think weather has been a huge factor in the low harvest rates.

If you decided that it cannot be sustained, go to every 2 or 3 regulatory years for resident hunters. This will give people more motivation to only harvest older, bigger and more mature rams.

Thank you



PC56

Submitted by: Spencer Pape

Community of Residence: Wasilla, AK

Comment:

Board of Game Members:

Good day and thank you for your time and dedication to this board. My name is Spencer Pape, I'm a resident of Wasilla and have been a big game guide/outfitter (#1302) for 18 years. Through guiding big game hunters, outdoor recreating, and working on environmental remediation projects, I spend roughly 70 days afield in 19C alone. While I am concerned about the Dall sheep population in the area, as well as statewide, I'm also concerned with the loss of another hunting opportunity. My predecessor in this unit shared with me nearly 50 years of sheep population cycles, along with a vast knowledge of Western Alaska. Dall sheep populations have shown a cyclical pattern ever since record keeping began in the 1920s. Per the 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. 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 for many other big game species. However, their adaptation to the alpine environment seems to serve them well." Through my observations, 3 out of the last 5 winters have been detrimental to Dall sheep populations. Due to the inclement winter seasons, coupled with the rise in predator populations, the sheep haven't had it easy. Yes, the population is down, but there are still good numbers of sheep on the mountain, I have seen them firsthand. For my outfit, this past Dall sheep season didn't end with every sheep tag being punched, but it did inspire optimism for the future with the sheep that are out there. With the full curl regulation that's in place, I have no doubt that the numbers will come back. While I understand that the purpose of the board, and its decisions, is to put the welfare of the state's game populations first, I would like to strongly urge the board to be mindful of the hunting opportunities for both residents and nonresidents as it pertains to Dall sheep.

Respectfully,

Spencer Pape



PC57

Submitted by: Rich Peterson

Community of Residence: Girdwood

Comment:

Please manage sheep with the an understanding of the affects of climate change and that we should consider weapons restrictions hunts like “archery only” as a management tool in the face of declining sheep numbers.

Thank you



PC58

Submitted by: Richard Ray

Community of Residence: Chugiak, Alaska

Comment:

First, nonresident sheep tag prices need to be increased. I checked 11 states and the lowest sheep tag was \$1200, the highest was \$3173 and the average was \$1940. Alaska only charges \$850 - less than half the average. We need to properly value our sheep. The increase in funds would allow for more research - especially when combined with matching funds. We need to stop undervaluing our sheep and get market price!!!!

Second, there needs to be a reduction in non-resident sheep hunting pressure. This will reduce overall pressure and provide a better hunting experience for all. Unlimited tags for nonresidents is really unfair to residents - especially when virtually every other state limits the tags to a maximum of 10% and the harvest is similar. Yes, residents get a free tag and consequently many residents get a tag and never really sheep hunt. A few people opportunistically harvest a sheep. But the resident to non resident tag ratio is very skewed as a result. Maybe a 25% reduction from 2022 levels would be a good start. And all nonresident tags become a draw. This should be by mountain range and or area within the range and would serve to spread out demand. And no, residents should not be subjected to a draw for sheep.

Maintain the current full curl/age harvest guidelines. The reduction in pressure will serve to allow rams to be passed as the pressure is lower and a hunter would have some confidence to hunt for a older/bigger ram.

Third, encourage the harvest of predators. This becomes especially important in severe winters when sheep are most vulnerable.

Fourth, What is the impact of late winter/early spring helicopter ski operations on sheep and lambing. Maybe the increased funding from an increase in tag prices could provide funding.

Yes, I am a resident and believe residents should have a benefit in opportunity. We are Alaskans!!!I am not opposed to a reasonable tag fee (\$50) if that makes everyone feel good - knowing it will reduce tag numbers and opportunistic harvest.

Lastly, a short story. A few years ago I contacted a transporter about getting dropped off at a strip to hunt sheep. The response was - I can't drop you off in a guide area. When I asked where was not a guide area all I heard was silence. Yep, a resident getting squeezed out by the guide system.

Please, let's achieve a balance for the sheep and all the rest of Alaska game .

Richard Ray



PC59

Submitted by: Jack Reakoff

Community of Residence: Wiseman Village

Comment:

Dear Alaska Board of Game,

I really appreciate your increased attention to the Dall Sheep population decreases and management issues in many mountain ranges or segments of ranges in Alaska . The dramatic declines are do to, of course early deep snow, large ice crusting during unusual rain events multiple times throughout the winter, and late spring melt timing.

Predation on vastly reduced populations even at normal levels, is very limiting. Even a few sheep lost is significant to the recovery of the sheep population back to Carrying Capacity.

Dall sheep are not migratory. They have very limited home ranges. They typically do not move over 6-12 miles linear in their whole lives. Long range dispersal is extremely rare, and normally occurs when sheep populations are exceptionally high. Younger sheep are highly reliant on older sheep to teach range use for best feed, important minerals, and most importantly predator evasion tactics.

It is a fallacy that rams die at high rates after 8 years of age. Most rams 8-10 years will actually survive sever winters better than almost or all lambs, yearlings, and ewes of their age class. Rams are larger and can take more snow depth, they are very good at predation evasion. The large mature rams are important for all the sheep to break trails in deep snow years.

After 11 year and older rams die at exponentially higher rates.

Of course rams over 8 die at high rates in high harvest areas. These data facts of survival are reflected in age at harvest for heavily harvested versus harvest rates in areas that maintain many of the 8-10 year age classes, post hunting.

Sustained yield sheep management should never rely on dispersals from distant healthy populations to supplement suppressed populations below carrying capacity.

Sustained yield management should always track composition of the ram populations to assure mature breeding rams are present post hunt, and are available for younger sheep predation evasion. Ewe composition is then inferred from the 2-7 year old rams composition.

Sustained yield management should eliminate the 8 year old regulation. Most hunters can not age a sheep when in-hand, let alone when they are at range. The annuli and anomalies in the horn confuse most hunters to over count the rings, to take sub-full curl rams. It is an absolutely critical issue to address the sun-legal take.

Regulations should be for only full curl, or both horns broken harvest.

Sustained yield Dall Sheep management should not rely only on full curl regulation. Populations that are staggering at 10-30 % of the carrying capacity from previous data sets, should move to conservation mode.

Road access to areas of suppressed Dall sheep populations should be moved to limited draw permits until the populations achieve carrying capacity.

Areas 20 miles distant from roads with suppressed populations should move to a shortened 5 day season until carrying capacity is achieved.

Jack Reakoff

Wiseman Alaska



unapologetically **FOR ALASKAN RESIDENTS**

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

October 11, 2022

To: Alaska Board of Game

Re: Comments for October 19, 2022 Dall Sheep Informational Meeting

Dear Chairman Burnett and members of the Board of Game,

Resident Hunters of Alaska (RHAK) has been submitting proposals over several cycles now regarding conservation concerns for our declining sheep populations and the continued unlimited nonresident sheep hunting opportunities granted by the Board of Game (board) in several areas of the state.

Most recently, at the 2022 Statewide Board of Game meeting, the board heard and deliberated RHAK proposal 267¹ – accepted as an Agenda Change Request in 2021 under the criteria for conservation concerns –which asked to restrict or limit nonresident sheep hunting in Unit 19C where sheep populations have drastically declined and nonresident sheep hunters take the overwhelming majority of the harvest each season.

The year prior to our Agenda Change Request (ACR) that was accepted for the Statewide meeting in 2022 as proposal 267, the board heard another ACR (ACR 3)² from a guide with twenty years of experience guiding in Unit 19C, outlining conservation concerns due to the same drastic declines in the sheep population and asking for the sheep season in Unit 19C to be shut down for two years for everyone.

Here are the Department comments on ACR 3 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.”*

Even though the author of ACR 3 outlined the same sheep conservation concerns RHAK expressed a year later, and the Department stated they also had conservation concerns, the board did not accept ACR 3 to be heard during the next board cycle and thus took no action.

Fast forward now to RHAK proposal 267, which started as ACR 4³. Here are the Department comments on RHAK ACR 4 from 2021: *“The Department believes that existing regulations are*

¹ <http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2021-2022/proposals/267.pdf>

² <http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2020-2021/acr/acr3.pdf>

³ <http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2021-2022/acr/acr4.pdf>



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.”

It should be noted that RHAK ACR 4 and RHAK proposal 267 are identical. Yet somehow a few months after ACR 4 became proposal 267 and got a lot more attention from the public at large, the Department changed their opinion completely regarding any biological or conservation concerns or that the existing hunting regulations were contributing to declines.

The board voted down RHAK proposal 267 by a vote of 1-6, with one board member agreeing that there were valid conservation concerns for the 19C sheep population and to limit nonresident sheep hunters as a first step. But after the McGrath Fish & Game Advisory Committee testified, expressing the same conservation concerns that RHAK and others have long held, asking that Unit 19C be completely shut down to all sheep hunting for two years, proposal 267 was brought up at the very end of the meeting for reconsideration to completely shut down Unit 19C to all sheep hunting for two years.

The board member who brought it up for reconsideration was one of the six no votes on RHAK proposal 267 and stated that the comments from the McGrath Fish & Game Advisory Committee, which he said was made up of a fair number of guides, had convinced him the problem in Unit 19C was real, and that sheep hunting should be shut down for two years. Along with the other board member who had voted in favor of proposal 267, he voted for a complete closure. The motion for a complete closure failed 2-6 and thus the board again took no action to protect the 19C sheep resource, limit nonresident sheep hunters, and protect resident sheep hunting opportunities.

So here we have a situation where a board member voted no on RHAK proposal 267 to limit nonresident sheep hunters based on conservation concerns for the sheep population, having seen the Department presentation earlier showing that nonresident sheep hunters took 85% of the harvest in 2021 in Unit 19C, now pushing to shut the entire season down for everyone, rather than to support limits on the component taking nearly all the harvest each year!

This outlines the kind of situation resident sheep hunters find themselves in when dealing with the Board of Game, which as a body is completely unwilling to limit or restrict nonresident sheep hunters.

And what about the guide industry, what did they have to say about RHAK proposal 267? Here is the Alaska Professional Hunters Association (APHA) opening statement on RHAK proposal 267, just as it appeared in their public comments (PC 007⁴): *“The APHA opposes Prop 267 because it is NOT conservation based and purely allocative.”*

This comes after a guide with 20 years of experience guiding sheep hunters in Unit 19C asked for a complete sheep hunting closure in 2020 due to the drastic decline in the sheep population

⁴ http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2021-2022/swr/pc_01-50.pdf



and his on-the-ground conservation concerns, and other guides expressing similar concerns, but APHA was stating that that there were absolutely no sheep conservation concerns.

Not surprisingly, as the Statewide 2022 Board of Game meeting moved along and more testimony was heard, APHA was changing their mind on whether or not there were valid conservation concerns, and privately supporting a complete closure rather than placing limits on their sheep-hunting clients. That way, the area didn't go to draw-only with a limited allocation to nonresidents, and when the unit opened up again everything would be the same, no limits at all on the nonresident sheep hunters required to hire a guide.

Of all the guides who proposed or supported a complete closure to sheep hunting in Unit 19C, not one (!) supported limiting the component taking 85% of the annual harvest.

Where Our Sheep Resource is Now, Late 2022

In preparing these comments, I have reached out to Department biologists across the state to get the latest trend count information and preliminary harvest data from 2022. Sheep harvest data from 2022 was not yet available for most areas. A big thank you to all the biologists who helped provide information.

Statewide (information from [REDACTED]) – *“Survey numbers were down everywhere, both in overall numbers of adults in the population, and low lamb numbers were evident in most units. Overall, and from conversations with FBX, Palmer, and Glenallen we’re at about 8-9% sublegals out of the total number presented for sealing statewide, which is in line with last year but approximately double the three or four years prior.”*

Unit 19C (information from AB [REDACTED]) – the 2022 sheep trend count in 19C was impacted by fires/smoke and then rains, so only a portion of the survey area was flown, showing a 50% decline in total sheep numbers compared to surveys since 2010. Lamb percentage was 11%, and only 1% of the sheep seen were legal rams. The average legal rams since 2010 was 5.7%

Preliminary 2022 harvest data shows that 29 total sheep were taken in Unit 19C, with nonresident sheep hunters making up 66% of all sheep hunters and harvesting 90% of the rams.

Table below from [REDACTED]

Unit 19C Sheep Harvest

Year	Nonresident	Resident	Total	%Nonresident
2018	79	39	118	67%
2019	75	39	114	66%
2020	54	14	68	79%
2021	34	6	40	85%
2022	26	3	29	90%



Unit 19C Sheep Hunters

Year	Nonresident Hunters	Resident Hunters	Total Hunters	%Nonresident
2018	107	107	214	50%
2019	93	97	190	49%
2020	83	83	166	50%
2021	67	56	123	54%
2022	37	19	56	66%

Unit 20A (information from AB [REDACTED]) – The 2022 trend count in the Central Alaska Range portion of Unit 20A was conducted in July in survey units 1-3. 292 total sheep were counted, which was 70 less than in 2021 and below the 2017-2021 5-year average of 507 sheep. There were 83 rams, which was 41 less than in 2021, with 20% of the rams observed as legal for harvest. Only 19 lambs were observed, which was half as many as observed in 2021 and well below the 5-year average of 82. The number of observed lambs in 2020 and 2021 was the fewest ever seen in the survey area dating back to 1983.

Preliminary 2022 harvest data for Unit 20A was 34 sheep. 23 were harvested by nonresidents and 11 by residents.

The Full Curl Harvest Strategy - Is it Always Sustainable Management?

Just prior to the sheep season in the Brooks Range this fall, the Federal Subsistence Board (FSB) closed sheep hunting for all users on federal lands for two years in Unit 24A and portions of Unit 26B west of the Sag River within the Dalton Highway Corridor Management Area, due to conservation concerns for the sheep population.

RHAK had the same conservation concerns as the proponent of the closure, but with the FSB system there is no avenue to just restrict nonresidents, who accounted for 40% of the sheep harvest in these areas, and without any assurances that when sheep hunting opened again that nonresidents would be limited, we opposed the hunting closure.

RHAK and others had previously (and unsuccessfully) proposed that the Board of Game limit nonresident sheep hunters in these areas over conservation concerns and fears that residents would lose general sheep hunting opportunities

At the FSB meeting, Department staff explained that there were no real conservation concerns for the sheep population in these areas; weather, not hunting, was the cause of the declines, and that the Full Curl/8-year-old (FC) harvest management strategy is sustainable, even when sheep populations are low. There didn't need to be any restrictions on hunting under the FC harvest regulations, even when sheep populations were in decline.

One of the federal land manager members on the FSB then inquired of Department staff about the complete closure to all sheep hunting in northwest Alaska (Unit 23) instituted by the Board of Game in 2015 based on advice and support from the Department. Unit 23 has been closed for quite a long time with no expectation it will ever open up again to sheep hunting in the near



future. How then, it was asked, is the FC management strategy always sustainable? If it was, why were northwest Alaska areas completely shut down to all sheep hunting? And when will sheep hunting be allowed again in these areas?

The Department did not have a real answer. How is it as well that in other areas where the Department and Board of Game managed for maximum general sheep hunting opportunities, such as in the Chugach Mountains, those areas went to draw-only after conservation concerns were raised by the Department?

Two opposites can't be true; the FC management strategy can't always be sustainable and at the same time the Department has conservation concerns from maximum sheep hunting opportunity and then supports draw-only hunts or complete closures.

The Board of Game uses the consistent Department position that the FC harvest strategy is always sustainable as a means of not taking action on limiting nonresident sheep hunters in large areas of the state. At the same time, the board requests information from the Department on sheep numbers so they can make an informed decision, but the Department does not do widescale sheep monitoring *because the FC harvest strategy is sustainable under all conditions*. (It also costs a helluva lot of money that would come from moose and caribou density estimates.)

Annual or sporadic composition trend counts are done, which are extremely valuable data, but they are done in small areas of the state and that data is then extrapolated to give an indication of what may be happening unit-wide. Often weather precludes doing an annual or semi-annual sheep survey.

The end result of all this is another catch-22. The Department says the FC management harvest strategy is always sustainable, and thus we don't need to do widescale sheep monitoring. The board demands "hard data" to make an informed decision, and the Department says they will get that limited data to the board, and when that data ends up proving sheep populations are in steep decline, the Department says there is still a harvestable surplus, FC management works and there doesn't need to be any limits or closures.

Rinse and repeat; this has been going on for years, and because of the Board of Game's refusal to take action to restrict or limit nonresident sheep hunters, we end up with complete closures like the one instituted by the FSB this year on federal lands in the Brooks Range, and a likelihood more of these types of federal actions will follow.

It's Not Just About Sheep Conservation!

For twenty years now, resident Alaskans have been submitting proposals to the Board of Game to limit nonresident sheep hunters where they are not currently limited. The board is well aware of the crowding and conflicts that occur in areas where they allow unlimited nonresident hunting. These types of scenarios negatively impact resident sheep hunters in many ways, from gaining access to the sheep hunting areas, conflicts in the field ("You are in my guide area" is not an uncommon phrase heard by resident hunters from guides, as if they own our public lands),



intense competition, far fewer legal rams and lower success rates. Unlimited nonresident sheep hunting also ends up creating guide-on-guide conflicts and unhappy clients.

The long-held Board of Game “solution” to these known problems is to somehow limit guides, which has been a stalling tactic to continue to do nothing, as the board has absolutely no authority over guides. What they do have authority over, and what is part of what they should have done long ago, is to limit the nonresident sheep hunters who are required to hire a guide.

We have the only Dall sheep population in the country. For many resident Alaskan hunters, Dall sheep and the other species that inhabit Alaska are a large part of why we live here. Every other western state except Alaska severely limits nonresident hunters to draw-only hunts for most species with a very limited allocation. Our state constitution demands we do the same in Article 8, yet the Board of Game refuses to do so when it comes to nonresident hunting of Dall sheep.

When I speak to nonresidents (even nonresident sheep hunters!) from other states at fairs and shows about unlimited nonresident sheep hunting in Alaska, the problems it creates, nonresident sheep harvests of 40-80+ percent and loss of resident hunting opportunities, to a T they tell me: *“We would never allow that in our state!”*

The fact that this is still being allowed by the Board of Game is one of the greatest travesties to our Dall sheep resource and to resident Alaskan sheep hunters.

Closing Comments

We all know that sheep are in trouble across the state, and we can intuit correctly that hunting was not the primary cause of declines, as these declines have happened in draw-hunt-only areas and on federal lands where sheep hunting is not allowed. We can also rightly infer that there is a harvestable surplus of sheep, even now with steep population declines, because after every season we seal some sheep that are over 8 years old, and thus would have been legal the next season.

However, we have gotten to the point where so few legal rams are on the landscape that at minimum hunting by nonresident sheep hunters needs to be restricted or severely limited. We can’t go with, “these declines have happened in the past and we didn’t impose limits and the sheep rebounded,” or “the FC management strategy is sustainable under all conditions.” Or that “guides will self-regulate” when populations are low. A few guides may self-regulate, but when a guided sheep hunt goes for upwards of \$25,000+ and the Department and Board of Game are saying there is a harvestable surplus there is little incentive to do so.

The state of Alaska has really never been in these circumstances; the climate and habitat are changing rapidly and these conditions are not what we saw in the past and are significantly different than some uncommon extreme weather events that led to past declines.

The focus for the Board of Game should be prioritized to:

1. Protect the sheep resource
2. Protect resident sheep hunting opportunities



Taking no action is not appropriate and hasn't been appropriate for a very long time now. Nonresident sheep hunters need to be restricted, or limited across the state to draw only hunts with a very limited allocation wherever that isn't happening now as a first step, before any complete restrictions or complete closures. It would be a great injustice should the board either shorten seasons for all or institute complete closures, both of which came up at the 2022 Statewide meeting on RHAK proposal 267 as viable solutions. Resident sheep hunters should not continue to pay the price and be restricted or limited when unlimited nonresident sheep hunting is taking place.

The issues on federal NPS and USFWS lands aren't any better because as sheep decline the federal managers do not change the numbers of sheep or clients that guides can take according to their exclusive guide use area concession permits that are valid for ten years. So, unless the board imposes limits on nonresident sheep hunters across the state, nothing changes on federal lands.

If no actions are taken soon, the sheep recovery will not happen or take much longer, and resident sheep hunters, guides and their nonresident clientele will all suffer the consequences.

We urge the board to address this issue during the next cycle and move to better protect our sheep resource and to ensure resident general sheep hunting opportunities can continue.

Sincerely,

Mark Richards

Executive Director Resident Hunters of Alaska (RHAK)



PC61

Submitted by: Chase Ronsman

Community of Residence: Talkeetna, AK

Comment:

-Chase Ronsman, AK resident

With understanding the recent hard winters on dall sheep populations and changing climate patterns, please consider allowing or shifting to regulations for bow hunting or even traditional bow hunting in order to preserve hunting periods instead of full time closures or more extensive draw hunts. Thank you for consideration!



PC62

Submitted by: Otis Rowland

Community of Residence: North Pole

Comment:

Please don't make residents have to win a drawing to hunt sheep.

If anyone needs to be limited it should be a nonresident .

Thank you for your time



PC63

Submitted by: Kim. Saner

Community of Residence: Soldotna AK

Comment:

I am very concerned about the sustainability of the Dall sheep population. It is evident that the DOG has out of state hunters as their priority and not a sustainable sheep population that is available for residents into the future. With the recent declines it is likely that a draw will be the only way a resident can hunt in the future. This is not what our goals should be. First sustained populations for the welfare of the species. Second, general hunt opportunities for residents and lastly hunt opportunities for non-residents. There should never be a draw hunt implemented unless non-residents have had restrictions placed on their opportunities first.



Submitted by: James Smith

Community of Residence: Anchorage, Alaska

Comment:

With declining sheep populations in certain areas of the state for many reasons. I would think age class restrictions should apply in statewide areas. I think this will make an Individual both a resident or a guide and his/her non resident hunter think twice about pulling the trigger. This should start based on the 2022 harvests and moving forward. We as residents and guides all need to take a long look in the mirror and try to do our part. We have no control over the weather and climate. But as hunters we do.

Residents should go to 1 and 4 as well in the declining problematic areas until populations increase.

Here is my proposal for statewide sheep season:

9 plus year or older an individual can hunt the following year.

8 yr old- can't hunt the following year for sheep

7 yr old "legal furl curl" can't hunt for 2 years for sheep.

7 yr old not legal can't hunt for 3 years for sheep.

6 yr old "legal" can't hunt for 3 years.

6 year old not furl curl or broomed can't hunt for 5 years.

Thank you for your time. This should be about the sheep not self interests. State lands in 19c and 20 need to go to concessions for sheep guides.

Thank you

James Smith

907-388-6842



If stricter management must happen, please consider the following:

- 1) Consider nonresident restrictions as a number #1 source of management. Only RESIDENT guides should be permitted to take sheep hunters. Quantity of hunters should be limited to each guide in areas that are not limited. For example, one experienced resident hunter may be successful with one tag, but one experienced guide can be successful with unlimited amounts of tags. Unit 19C is a perfect example, 85% of harvest is nonresident guided hunters.
- 2) Hunting pressure has reduced with success rates, if hunting opportunities were closed and then reopened when surveys show better numbers, hunting pressure would increase dramatically the first year.
- 3) RESIDENT ONLY Youth hunts should not be shut down. This is a chance for a young hunter to experience sheep hunting without the stress of congestion or competition in most cases. Harvest is not the main aspect of this hunt. Consider youth hunter success rates vs nonresident success rates before closing youth seasons.
- 4) Dall sheep education in relation to a legal ram should be mandatory for all sheep hunters entering the field, that meet certain criteria. The criteria could be outlined as:
 - a. A non-successful permit or harvest ticket holder (meaning someone who has never killed a legal ram) (Any ram or sheep hunts should not qualify as successful)
 - b. First time permit or harvest ticket holders
- 5) Sub legal kills should have stricter fines and/or punishment. Around 50% of sub-legal sheep being harvested comes from nonresident guided hunters; guides must also be susceptible to penalties on the first offense. There should be no excuse for a professional hunter to take a sub-legal ram. A "ding" on their record is not enough.
- 6) If one range or area must be shut down, all areas should be shut down to avoid over pressure and crowding in certain areas.

Thank you,

Matt Soloy

[REDACTED]

[REDACTED]



Submitted by: Brian Stoltz

Community of Residence: Fairbanks, AK

Comment:

More should be done to discourage the harvest of sub legal sheep. I am not sure what the numbers from this year are, but I know of a few taken that were confiscated and they were rams that were clearly not legal.

It is purely anecdotal, but there is a certain mentality that if you shoot a sub legal sheep, you just self report and pay a small fine. I know of several folks that did so.

For those that shoot a sub legal sheep - even if you self report - there need to be more substantial fines and a loss of sheep hunting privileges for a reasonable period of time. This should include residents, non residents and youth hunters alike.

Thank you for your time!

Brian Stoltz

Fairbanks, AK



Submitted by: Dustin Tallman

Community of Residence: Wasilla, AK

Comment:

To the members of the Alaska Board of Game, please consider making changes to the current regulations regarding the harvest of Dall Sheep. For too long you have heard from residents of the State of Alaska, and maybe have seen for yourselves, that the Dall Sheep population is declining, yet you have done nothing to protect the FUTURE hunting and allocation opportunities for Alaska resident hunters. When you read the written testimony and hear the phone testimony, keep in mind that the Alaska Constitution states; The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people. Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use. As members of the Board of Game, you have the opportunity to be the voice of Alaska residents and remind the legislature that the game should be managed for the residents of Alaska first and foremost. At the current rate, the same opportunities I had to hunt sheep while growing up will not be there for my kids. Between the harsh winters, depredation, and high success rate of guided non resident hunters, the sheep population doesn't stand a chance. Please consider limiting the quota for non resident hunters, doing away or changing the full curl rule, and increasing the youth hunting season.

Thanks for you time



PC68

Submitted by: Zachary Truskolaski

Community of Residence: Girdwood, AK

Comment:

I believe it would be productive for the board to evaluate additional weapons restrictions for Dall Sheep hunts, such as “Archery Only”, in order to maintain healthy management of the species. Unprecedented advances in technology enable hunters to travel further into remote places and make further shots with centerfire rifles. It would be interesting to hear from the board on whether or not they believe these advances infringe on the fair chase of Dall Sheep. As a new resident to Alaska I possess what I would qualify as an “outsiders opinion”. That being said it seems to me that long range shooting, which I would qualify as in excess of 500 yds, creates the temptation to shoot at game that may be unrecoverable. Archery tackle removes that temptation as the shooter is likely sharing terrain with the quarry, rather than shooting across a canyon or up into steep cliffs. However if the board finds that management objectives are being met, I would understand a continuance of the current regulations.



PC69

Submitted by: Kristina Votaw

Community of Residence: Anchorage, AK

Comment:

My understanding is that based on preliminary 2022 reported harvest data, this is the lowest sheep harvest on record. Sheep are in severe decline Alaska-statewide for various reasons, not just as a result of hunting or over-hunting. I am an Alaskan and a hunter and I think we should make it a priority to protect our sheep. At the same time, it saddens me to know that declining sheep populations will inevitably lead to less opportunity for Alaskans to hunt sheep here at home in our own ranges. I have two children and would love to one day be able to take them on sheep hunts. It’s extremely difficult to draw desirable tags in this state due the large number of people putting in for the low number of available tags. I would ask the Board to consider limiting the number of non-resident sheep hunts, particularly in Unit 19C where nonresidents with guides accounted for 90% of the sheep harvested this fall, and also in any other units where nonresident sheep hunting is unlimited BEFORE making any more sheep hunts draw only for everyone.

Thank you for your time and consideration. This is an issue that is important to all Alaskans.



Submitted by: Jay Wattenbarger

Community of Residence: Two Rivers, AK

Comment:

I fully support RHAK's position on sheep hunting management in Alaska. I've been an avid sheep hunter in Alaska for over 30 year, hunting in the Alaska Range, Wrangell Mountains, Yukon-Tanana uplands, and the Brooks Range. Over that time I've witnessed the overall decline in sheep numbers and an increase in non-resident sheep hunters (guided). I chose not to sheep hunt this year, primarily due to competition from guides in the area I hunt.

It is time for the BOG to follow what is clearly stated in Alaska's hunting regulations:

"Nonresidents are allowed to hunt when there is enough game to allow everyone to participate. When there isn't enough game, nonresident hunters are restricted or eliminated first. If more restrictions are necessary, seasons and bag limits may be reduced or eliminated for some residents."



October 13, 2022

Ms. Kristy Tibbles
Executive Director, Alaska Board of Game

Dear Ms. Tibbles/BOG:

Please accept this letter from the Wild Sheep Foundation (WSF) regarding the October 19, 2022 Alaska Board of Game (BOG) public meeting on Dall's sheep management. From many conversations with our Fish & Game Department colleagues, Alaskan hunting outfitters, resident and non-resident hunters and WSF members with keen interest in Dall's sheep management in Alaska, plus our Alaska Chapter WSF leadership, we are well aware of the ongoing situation and management challenges facing Dall's sheep in Alaska, and facing those responsible for their conservation.

WSF will (remotely) attend next week's live-streamed BOG public meeting; WSF will listen intently to survey/inventory, ram harvest, and other pertinent data to be presented by ADF&G reps, along with discussion of future management considerations. WSF realizes no oral testimony will be taken next Wednesday, so we hope this letter serves as our sincere expression of interest in this topic, in hopes that WSF may engage in future, further discussions about Dall's sheep management options.

WSF is well aware of the Dall ram harvest history over the past ~45 years, as well as statewide trends in both resident and non-resident hunting participation and ram harvest. WSF fully believes the current situation is not a harvest allocation issue; rather, WSF believes the focus should be on making rational decisions and implementing tangible actions to improve the status and trajectory of Dall's sheep in Alaska. The complexity of the current situation involves a number of factors, including compromised lamb survival/recruitment, habitat quality considerations in the face of changing climatic conditions, travel/access management, predation, disturbance, recent disease challenges, and many more biotic and abiotic parameters.

WSF is aware of previous dramatic fluctuations in Dall's sheep numbers (in Alaska, and range-wide); we're also aware that abundant, high-quality habitat has "always" been available, to help facilitate Dall's sheep recovery. With the biotic and abiotic changes Alaska has/is/and will experience, WSF is most concerned about helping maintain and/or enhance Dall's sheep habitat quality and quantity in Alaska.

Having just granted \$1.22M in wild sheep conservation project funding, with (again) no project proposals received from Alaska, WSF stands ready to engage and assist the managers of Alaska's Dall sheep populations and habitats. Thank you for your leadership on this issue; we look forward to next Wednesday's live-streamed public meeting.

Sincerely,

Gray N. Thornton
President & CEO

Brett K. Jefferson
N.A. Conservation Chair

Jack Atcheson, Jr.
Int'l Conservation Chair

Kevin Hurley
VP for Conservation



Submitted by: Ethan Williams

Community of Residence: Wasilla

Comment:

Concerning the state of our Dall Sheep populations, I think we have a crisis in the making. There have been ideas that have been brought up that indicate some of the causes of this situation. There is also similar thinking that has been initiated as to the solutions of this predicament we are in with our sheep populations and quality. In order to solve and cure our dilemma, I feel, that every segment associated with Dall Sheep management, consumption, and enjoyment is going to have to sacrifice something in order to bring back a healthy resource. I feel we need to go to ground zero and implement the solutions for future healthy populations. Only then can clarity be achieved with the complications that include money and politics. I personally believe that we need to close all sheep hunting for a minimum of two years while working on the solutions that will insure better Dall Sheep survival. We need to be proactive in forming a successful management program moving forward. Thank You.
Ethan Williams



Submitted by: Birch Yuknis

Community of Residence: Wasilla, Alaska

Comment:

BOG thank you for taking the time to read my comments. I am fairly certain the presentation is going to detail the dismal nature of Alaska Dall sheep populations. That sheep numbers are down across the State. That our winters have been changing. Hopefully the presentation talks some about non-human predation. Then there is human predation.

What can we, as a State, fix/work on? I am pretty sure no one has control over the Weather, but as an individual, there is little I can do to change it. The non human predation by bears and canines can be slightly addressed with some predator management. The Golden Eagle predation is untouchable by the BOG due to Federal Migratory bird ramifications. The human predation is where the BOG can and should do something to manage the humans. As of late most of the BOG arguments for human predation have centered on Non resident vs resident or bow hunter vs non bow hunter or even airplane sheep hunter vs non airplane sheep hunter. Some have called for closure of Sheep season. Some like to cherry pick Heimer's research and use the statement that "Full Curl" harvest does not harm the sheep population. If you look deeper at Heimer's research, he even stat's that this is only true if you have enough adult males to help protect the herd. So you can't remove every Full Curl ram and expect the herd to do well.

Whatever side you are on, hunter (of any kind) or even non hunter who just wants to see sheep on the mountain, ALL agree something needs to be done. The BOG can no longer kick the can down the road and not do anything definitive. The BOG is going to have to impose restrictions on human

predation. As a resident I would prefer to see nonresident harvest reduced or eliminated before I see resident harvest reduced or eliminated. Going to a one every four harvest strategy only hurts the residents.

Something has to be done and allot of people will not be happy no matter what you decide.

I apologize for the rambling, but I wanted to get a note into the BOG for this meeting.

Thank you, Birch Yuknis

Alaska Resident all my life, except for some schooling.



PC74

Submitted by: Frank Zaldivar

Community of Residence: Fairbanks Alaska

Comment:

Dear board, I'm a new resident of Alaska coming from Nevada. I moved here in 2021. Coming from the great state of Nevada and the only state that has 3 species of sheep. I would highly recommend a 10% nonresident quota on all sheep game management units. If you are not aware Nevada is a draw only state. As a resident of Alaska I believe the board has a responsibility to uphold resident hunting opportunities before nonresidents. I strongly recommend and whole heartily believe in the support of RHAK proposal 267 and RHAK ACR 4 from 2021. I hunted sheep this year in unit 14A with a friend who has been hunting it for years. We seen one legal ram in 8 days. When I moved to alaska I believed that this was a destination for dall sheep but I was sadly mistaken. I believe this board has failed at understanding the concerns of resident hunters and has show time and time again for a lack of using multiple sources before making a sound decision on the great dall sheep that call Alaska home.

For your consideration Frank Zaldivar, Alaska resident Fairbanks.



PC75

Submitted by: Adam Zank

Community of Residence: Willow, AK

Comment:

Good afternoon to all parties reading this comment.

I strongly recommend ADFG and the board of game consider imposing or implementing new regulations on harvesting of Dall sheep as well as harsher penalties for violations of taking an sublegal ram. It is no secret that Alaska's Dall sheep population has reached a critically low point. Potentially reducing non resident tag allocation to no more than 10% and limiting Dall sheep harvest for all hunters to 1 every 4 years are likely unpopular options however it has come to the point where they need to be put in place. Habitat management is also an issue with encroachment of shrubbery on Dall

sheep feeding grounds and habitat in general. Collaboration with the Wild Sheep Foundation which raises significant funds to "keep sheep on the mountain" should be explored in a more active approach as well. Finally, penalizing the take of sub legal rams needs to be addressed. Understandable no one is perfect and people make mistakes however hunters and guides who have killed multiple sublegal rams needs to experience stiffer monetary fines and license suspensions.

Thank you for your time and I strongly urge you to consider these comments by outdoors men and women who have taken the time to share their thoughts. Have a good day and let's all work together to help better manage the Alaskan Ovis dalli.
