

PROPOSAL 181

5 AAC 85. 055. Hunting seasons and bag limits for Dall sheep.

Limit nonresident sheep hunting in Unit 20A by drawing permit only as follows:

Limit nonresident sheep hunters in Unit 20A to draw only permits with a limited allocation of up to 20 permits.

Unit 20 Remainder Nonresident Hunters

**One ram with full curl horn or larger
by drawing permit only, every four
regulatory years; up to 20 permits may be issued**

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORNS
OR LARGER EVERY FOUR REGULATORY YEARS]

We understand that the board and the department may want higher “up to” language so when/if the sheep population increases the number of permits can increase. At this time, however, considering the declining sheep population in Unit 20A and the extremely low recruitment, we do not believe nonresidents should receive more than 20 permits.

Alternatively, the board has in the past set regulations for sheep hunting that only offer hunting opportunity when there is a certain amount of estimated harvestable surplus. So, if for example the estimated harvestable surplus of sheep in Unit 20A was 50 legal rams, the board could, under a nonresident draw permit system, allocate a percentage of the harvestable surplus to nonresidents.

We would support allocating 25% of the estimated harvestable surplus to nonresidents under such a system, which would look like this:

Unit 20 Remainder Nonresident Hunters

**One ram with full curl horn or larger
by drawing permit only, every four
regulatory years; the number of permits
issued is up to 25 percent of the estimated
harvestable surplus**

Aug 10 – Sept 20

[ONE RAM WITH FULL CURL HORN
OR LARGER EVERY FOUR REGULATORY YEARS]

What is the issue you would like the board to address and why?

- Conservation concerns for the declining sheep population in Unit 20A.
- Continued unlimited nonresident sheep hunting opportunity in Unit 20A
- Nonresident sheep hunters taking majority of the harvest in Unit 20A

- Crowding and conflicts with unlimited nonresident sheep hunting opportunity in Unit 20A
- Concerns residents could lose general sheep hunting opportunity in Unit 20A.
- Questions on whether FC harvest management is always sustainable.

At the 2023 Southcentral Region meeting in Soldotna, the Board of Game spent considerable time deliberating board-generated Proposal 204 to completely close sheep hunting in Unit 19C for five years, based on conservation concerns the board had for that declining sheep population.

The department opposed Proposal 204, saying that while they were concerned with the recent sheep population declines, they had no conservation concerns for the sheep population because full-curl management (FCM) was sustainable under all conditions. Hunting was not the cause of sheep declines, they said, and any hunting restrictions would not help the sheep rebound faster.

The board, however, questioned the department's position on FCM harvest sustainability, based on recommendations the department made in the past to restrict sheep hunting in other areas that allowed unlimited hunting opportunity. For example, the department used an Emergency Order in 2014 to close all sheep hunting in Unit 23, and recommended that the board completely close Unit 23 to all sheep hunting in 2015, based on conservation concerns for the sheep population.

Unit 23 is still closed to all state sheep hunts, even though the sheep population there is much higher than in other areas, like the Kenai Peninsula, where the Department opposes any sheep hunting restrictions.

Department Position that Unlimited Sheep Hunting Opportunity under FC Harvest Management is Sustainable Doesn't Add Up

Here is part of the Department's statement and justification for closing Unit 23 to all sheep hunting in 2014¹: *"This emergency order closes all sheep seasons in Game Management Units 23 and 26(A) for all resident and nonresident hunters due to severe decline in sheep numbers in the contiguous populations of the DeLong Mountains and Schwatka Mountains.*

Sheep populations in the western Brooks Range within Units 23 and 26(A) experienced severe winter conditions in 2013-2014. Starvation and loss of protective habitat resulting from ground-fast ice have contributed to increased declines of sheep populations in the De Long Mountains and Schwatka Mountains. Previous declines during 2009–2011, low reproductive potential, and poor lamb production over a multi-year period have significantly reduced the number of sheep in Units 23 and 26(A).

*The large decline in the overall population, the low numbers of rams in the population, and the apparent very low recruitment rate **all suggest that any level of harvest could be detrimental to the population, prolong the decline, and limit recovery.**" [our emphasis]*

This statement from the department on the Unit 23 sheep hunting closure is the exact opposite of what the department has been saying about other sheep populations in other areas (like Unit 19C and 20A) that are experiencing similar declines for similar reasons. For those areas, the department has stated that continued unlimited sheep hunting opportunity will **not** prolong the declines and will **not** limit recovery.

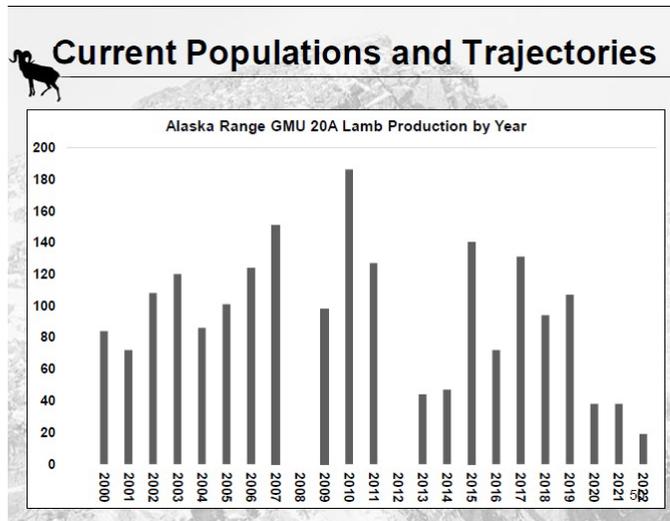
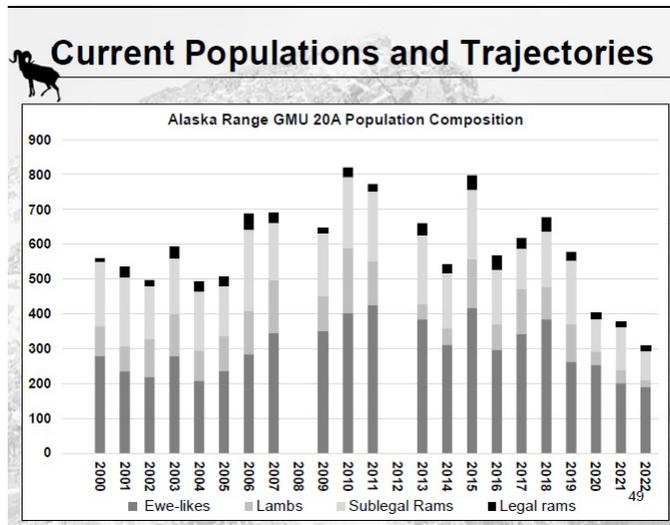
And What About the Sheep Hunting Restrictions in the Chugach Mountains?

A similar thing happened in the Chugach Mountains where maximum sheep hunting opportunity was allowed under FCM harvest, until the department suddenly had conservation concerns for that sheep population in 2008 and recommended hunting restrictions, which the board then passed and are still in place today.

These concrete examples of the department disagreeing with their own premise that unlimited sheep hunting opportunity under FCM harvest is always sustainable are why we believe that continued unlimited nonresident sheep hunting opportunity in Unit 20A needs to be curtailed and limited.

Below are sheep population and harvest data from the Department and further comments.

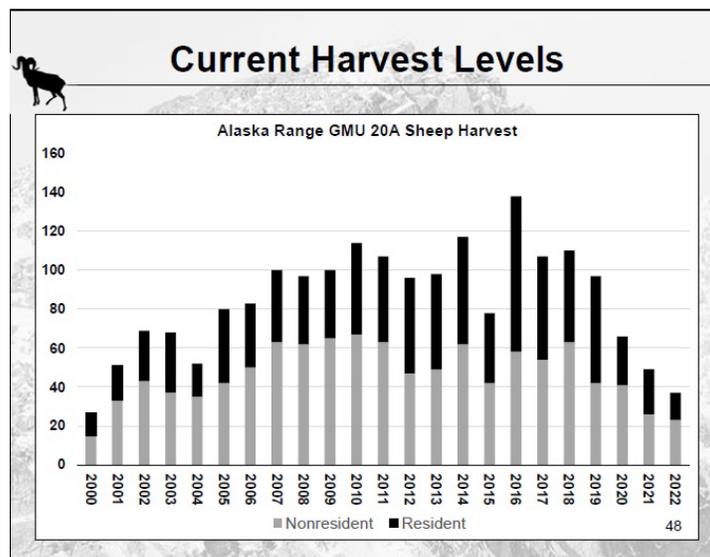
ADF&G 20A Sheep Population & Harvest Data:



Looking at the increased lamb production in 2015 and 2017 may lead one to believe that 2023 and 2025 will see better legal ram numbers, but information from the most recent 2022 trend count shows that recent severe winters have devastated those cohorts, as well as recruitment the past few years.

The low lamb recruitment the past three years in Unit 20A is as much a concern as the “*poor lamb production over a multi-year period*” that “*significantly reduced the number of sheep in Units 23 and 26(A)*” and led to the complete sheep hunting closure in those units.

The bottom line is that the near future for sheep in Unit 20A is grim.



Hunters consistently harvested 100 sheep from Unit 20A for over a decade, but consistent severe winters, late springs, predation and other factors led to steep population declines that became noticeable in the decreased harvest numbers starting in 2019.

Unit 20A Sheep Harvest Statistics from ADF&G (Last Five Years):

| Year | Total Hunters | Resident Hunters | Nonres Hunters | Total Harvest | Nonres Harvest | Resident Harvest |
|------|---------------|------------------|----------------|---------------|----------------|------------------|
| 2018 | 276 | 196 | 80 | 107 | 62 | 45 |
| 2019 | 249 | 183 | 66 | 89 | 40 | 48 |
| 2020 | 245 | 184 | 61 | 63 | 41 | 22 |
| 2021 | 179 | 134 | 45 | 44 | 26 | 18 |
| 2022 | 138 | 93 | 45 | 36 | 24 | 12 |

Average nonresident sheep harvest over last five years is 58%. **Nonresident hunters took 66% of the sheep harvest in 2022.**

Below are some quotes from the department memorandum with the results of the Unit 20A 2022 sheep survey:

“The number of observed lambs in 2020 and 2021 was the fewest ever seen in the survey area dating back to 1983. This 2022 survey was the third consecutive year of exceeding the poorest lamb crop on record.”

“The number of sheep observed on this survey was the lowest ever observed in this survey area. The low number of sheep during the 2020, 2021 and 2022 surveys (Table 1) are likely attributed to 3 consecutive hard winters which had deep snow and late breakup, both of which can lead to poor lamb survival. This may have also had a negative effect on adult sheep as well. We are also entering the time frame in which the poor cohorts of 2013 and 2014 may be shown in the low number of legal rams available.”

Again, this is comparable to the situation we had in Unit 23, yet somehow the department does not have any conservation concerns.

How can we trust the department not to eventually say they have conservation concerns for the sheep in Unit 20A and then recommend restrictions that once again fall on resident sheep hunters? It is past time for the board to put all nonresident sheep hunters in Unit 20A on draw-only hunts with a limited allocation to protect the sheep resource and protect resident sheep hunting opportunities.

¹ <https://www.ADF&G.alaska.gov/static/applications/webintra/wcnews/2014/orders/05-06-14.pdf>

PROPOSED BY: Resident Hunters of Alaska

(HQ-F23-019)
