

**ACR #1** – Close the trapping season for river otter in Units 14A, 14B, and 16.

**SUBMITTED BY:** Dewey Bitler

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

Alaska Administrative Code Number 5 AAC 92.008. Trapping river otter, Central Alaska Units 14A, 14B and 16.

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

Lack of salmon to Susitna River drainage caused by the northern pike infestation. Northern Pike eat all the salmon fry. The main predator of Northern Pike is river otters, and their numbers are suppressed by a liberal trapping regulation. River otter start having their pups in January while the trapping season goes until March 31<sup>st</sup>. The river otter can eat 2-3 pounds of fish a day. We are spending millions of dollars on gillnetting Northern Pike when the river otter can do it for free. At \$100 a pelt it doesn't make sense to pull a predator like that out of the ecosystem.

**WHAT SOLUTION DO YOU PREFER?**

Central Region

River Otter

Area 14A, 14B and 16

NO OPEN SEASON

In the future have a shorter season corresponding to mink with a limit of 2.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

- 1) To correct an error in regulation.**
- 2) To correct an effect of a regulation that was unforeseen when a regulation was adopted.**

We have to do everything we can to help the salmon. There are many problems causing the demise of the salmon. One problem is the Northern Pike infestation that was unforeseen. Everything that Fish and Game has tried has not worked. We need to use every tool available to combat Northern Pike. One tool is the river otter.

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

Low numbers of salmon return to Susitna River drainage. Low numbers of river otter.  
High numbers of Northern Pike.

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

The benefits far outweigh any inconvenience this ACR would cause. It would make for better trapping opportunities in the future.

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

A delay would prolong the absence of salmon.

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

River otter numbers will stay suppressed and Northern Pike numbers will increase.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

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

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

Hunter and fisherman. I do not want to see Northern Pike expand into lakes I fish for trout

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

To my knowledge this ACR has not been considered before.

**ACR #2** – Award DI403 and DI404 permit recipients whose tags were cancelled on July 24, 2024 the same hunting permits for an upcoming season, and develop a plan with ADF&G to ensure late season changes do not impact hunters.

**SUBMITTED BY:** Lang Van Dommelen

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

Alaska Administrative Code Number 5 AAC: 92.050. Required permit hunt conditions and procedures.

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

The Board of Game should consider addressing the cancelled DI403 and DI404 permits that were cancelled on July 24, 2024. This cancellation happened after impacted hunters were contacted by ADF&G to congratulate hunters and encourage hunters to begin their planning process. Some hunters were given the opportunity to hunt this season while approximately half of hunters were not given this opportunity.

**WHAT SOLUTION DO YOU PREFER?**

The preference would be awarding these cancelled tags during an upcoming hunting season. I would also encourage the Board of Game to work with ADF&G to develop a plan to ensure late season changes do not leave hunters who were expecting and planning to hunt a particular unit or species hanging. Successful hunting in Alaska requires extensive planning, especially for those who do not have access to motorized means of transportation.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

N/A

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

Develop regulations that would ensure that this type of change does not occur in the future.

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

These tags were cancelled to account for a biological concern.

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

N/A

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

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

Hunters who had their tags cancelled will not be eligible to bison hunt.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

This seeks to address how tags were cancelled after they were awarded during the November 2023 draw application period for the 2024 hunting season

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

Every year both resident and nonresident hunters entire the draw application period with the hope of drawing a tag. In 2024, tags for DI403 and DI404 were awarded in February. In April, ADF&G emailed tag winners congratulating them and encouraging them to plan their hunt. In late July of 2024 they again contacted winners and announced that roughly half the tags were being cancelled. The timing of this is problematic because hunting in Alaska, especially for those who do not own airplanes and boats requires significant planning, additionally, me and other hunters who were planning this once in a lifetime hunt had already made significant financial investment in this hunt with the purchase of new gear, ensuring rifles met the hunt requirements, etc. Addressing how this situation will be rectified will give hunters better information and the ability to plan. Unfortunately, I and other cancelled permit holders will not have this information prior to the draw application period.

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

Hunter

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

The Alaska Department of Fish and Game has stated that they plan to also request an ACR.

**ACR #3** – Allow a permittee who had their Unit 20D bison permit revoked for regulatory year 2024, to have the permit transferred to regulatory year 2026 upon request, or remove the lifetime and ten-year loss of eligibility for those hunters to apply.

**SUBMITTED BY:** Alaska Department of Fish and Game

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

Alaska Administrative Code Number 5 AAC: 92.050. Required permit hunt conditions and procedures.

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

The department manages the Delta Bison Herd within a narrow range of abundance in an attempt to avoid conflicts with agriculture and maintain a viable and sustainable population. The department adjusts permits and bag limits annually in an attempt to keep the population at approximately 360 adults, post hunt. The department assumes that natural mortality is going to be very low in this population, and when natural mortality events occur, as in the historic winter of 2021/2022, permit numbers or hunt conditions must be significantly changed. The department is often unaware of the degree of mortality until after permits have been awarded. A mortality event in the spring of 2024 also led to a situation where too many permits were awarded, running a risk of unsustainable harvest.

**WHAT SOLUTION DO YOU PREFER?**

After conducting post-calving surveys in the summer of 2024, the department recognized the need to reduce the overall number of permits, and to change the bag limit to bulls only. Chances of winning a Delta bison permit are extremely low, existing regulations allow residents to be eligible for a permit only once every ten years, and existing regulations allow nonresidents to be eligible for a permit once per lifetime. Given these restrictions, the department would like the board to consider transferring any DI403 and DI404 permits awarded for the 2024 regulatory year that were subsequently taken away, to be transferred to regulatory year 2026. This would allow those who had been announced as winners for regulatory year 2024 to hunt in regulatory year 2026.

Absent the transfer of permits across regulatory years, the department would like the board to consider lifting the lifetime and 10-year loss of eligibility for those hunters that were awarded permits that were subsequently revoked, allowing those hunters to begin applying again.

5 AAC 92.050(a)(6) would therefore read:

(E) a permittee who had their Unit 20(D) bison permit revoked for regulatory year 2024 may, upon request, have the permit transferred to regulatory year 2026.

Also offered for consideration, adding a new sub-subparagraph to 5 AAC 92.050(a)(4)(H):

5 AAC 92.050(a)(4)

(H) a resident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit for 10 years; a nonresident who is a successful applicant for a bison drawing permit hunt is ineligible to apply for another bison drawing permit;

**(i) however, a resident who had their Unit 20(D) bison permit revoked for regulatory year 2024 is eligible to apply for another bison drawing permit for regulatory year 2026; and a nonresident who had their Unit 20(D) bison permit revoked for regulatory year 2024 is eligible to apply for another bison drawing permit.**

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

N/A

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

This regulation covers the vast majority of permit issuance scenarios, however due to the timing of bison surveys, the department's attempts to manage within a narrow window of abundance for this population, and the early notification of permit winners, there are occasionally scenarios where the department must retract permits or eliminate a hunt entirely. Applicants are warned that hunts could be eliminated, and that application fees may not be refunded. The Delta bison hunt is unique in that it is highly sought after, and bison hunts in general have a lifetime or 10-year moratorium (depending upon residency) on re-applying after winning, further emphasizing how unique it is to win such a permit, and how unusual it is to win and then lose such a permit.

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

By reducing the overall number of permitted hunters the department has addressed the conservation concern.

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

N/A

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

N/A

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

Permit winners that have had their permits retracted will be unable to hunt, and may not have the chance again, even if they are allowed to reapply. Previous attempts to adjust hunt conditions to allow all winners to hunt have resulted in low success rates, and short hunt windows. Many hunters expressed a preference to simply hunt in a different year, rather than have the hunt conditions drastically altered. Although it does not address the loss of opportunity in 2024, the department is considering advertising a more conservative number of permits in the drawing supplement, which may mitigate this issue moving forward.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

Although this change does address allocation of permits, it is not associated with particular user groups, other than current and future winners.

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

This is a novel circumstance, that requires timely action, if permits are to be deferred to a later regulatory year.

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

The department administers this hunt.

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

This ACR has not been considered before, although similar ACR's have been considered in the past (i.e. transferring bear permits awarded during the Covid-19 pandemic.)

**ACR #4** – Change Unit 18 moose hunt area boundaries of Zone 2 of the RM615.

**SUBMITTED BY:** Organized Village of Kwethluk, Chariton Epchook

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

Alaska Administrative Code Number 5 AAC 85.045. Hunting seasons and bag limits for moose.

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

Moose hunting in Zone 2, change boundaries in Akulikutak and Kwethluk Rivers. Moose hunters from Kwethluk and surrounding villages have to travel 18 air miles to the Zone 2 boundary using a lot of unleaded gasoline and often times have problems where some people do not reach the Zone 2 boundary when the river is low and have difficulty finding the main river channel.

**WHAT SOLUTION DO YOU PREFER?**

“Zone 2: In Unit 18, all Kuskokwim River drainages south and east of a line beginning at the confluence of Whitefish Lake and Ophir Creek at the Unit 18 boundary and continuing southwest to the confluence of Tuluksak and Fog Rivers, then southerly to the lower eastern Kisaralik River-Kasigluk River cutoff, then westerly to the western lower Kasigluk River cutoff then to the Akulikutak River where it meets an unnamed creek, coordinates: 60.70057, -161.25313, then westerly to the confluence of the Kwethluk River and Whitefish Net Creek, coordinates: 60.700663, - 161.252974, then southwesterly to the confluence of Eek River and Middle Fork Eek River, then southwesterly to end at 600 4.983 N, 1610 37.14W.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

With the current regulation, people from Kwethluk and other villages have to travel over 18 airmiles to reach Zone 2 to hunt moose. With this change request, people will travel a little over 10 air miles.

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

With the current regulation, people from Kwethluk and other villages have to travel by boat over 18 airmiles to reach Zone 2 to hunt moose on the Kwethluk and Akulikutak Rivers. With this change request, people will travel less miles and save on high prices of unleaded gasoline. The Zone 2 border was put into place in 2017 when unleaded gasoline prices were much lower than today.

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



The quotas for bull moose harvest in Zone 2 in previous years may have not been met and with this change the season may be closed earlier than October 15th of each year.

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

It does not.

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

It does not.

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

Zone 2 bull moose hunt will continue to not meet it's quota of moose limit for the area.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

It is good for all area moose hunters traveling by boat from other surrounding villages where they do not have to bring a lot of unleaded fuel.

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

It is not allocative.

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

I am a hunter and a subsistence user.

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

This proposal has not been considered.

**ACR #5** – Modify the resident and nonresident hunt structure for sheep in Unit 19C.

**SUBMITTED BY:** Unit 19C sheep working group

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

Alaska Administrative Code Number 5 AAC: 85.055. Hunting seasons and bag limits for Dall sheep.

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

Declining sheep populations in Unit 19C

**WHAT SOLUTION DO YOU PREFER?**

We request a closure for 2025 to all general season hunts except the RS380 subsistence hunt.

In 2026/27 there will be a temporary draw hunt with a sunset clause after two years where 80% permits are allocated to residents and 20% to nonresidents, with a 5% cap for second degree kindred (2DK) nonresident hunters, coming out of the nonresident allocation. The 2DK hunt sponsor shall also notch harvest ticket for bag limit.

We request Unit 19C be used as the pilot program for the guide concession program, implemented by 2028.

In 2028, if the guide concession program for Unit 19C is in place, then residents and nonresidents will go to harvest ticket hunts.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

N/A

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

N/A

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

Yes

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

No

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

No

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

The Unit 19C sheep working group will not achieve our mandate. The board deferred all proposals for sheep hunting in Unit 19C out of cycle to allow the sheep working group to submit a proposal which is timely with the other proposals.

The closure was a temporary measure put in place, and we are now in a position to create future hunting opportunities for multiple users. The Unit 19C sheep working group will not achieve our mandate. In this time of uncertainty, we are trying to ensure the healthy sheep populations in Unit 19C.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

We remain concerned primarily about the health of the sheep population in Unit 19C. Please refer to the charge statement of the working group, the results of the working group meeting in October 2024, and the attached letter.

This approach prioritizes the well-being of the species over the distribution of hunting opportunities. The primary goal is to balance the interests of conservation, local communities, and economic factors.

These adjustments are about managing the resource sustainably rather than just allocating hunting rights.

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

N/A

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

Unit 19C sheep working group established by the Board of Game.

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

No

October 21, 2024

To: Board of Game

To: Ryan Scott, Director of the Division of Wildlife Conservation, Alaska Fish and Game

From: Unit 19C Sheep Working Group

The Unit 19C Sheep Working Group members want to thank the Board of Game for creating the working group and giving it the opportunity to focus on understanding and addressing the key issues facing sheep in Game Management Unit 19C. Our group was comprised of nine individuals who collectively represented subsistence users, nonconsumptive users, guides, transporters, private landowners, and general Dall sheep hunters (see enclosed roster). During discussions regarding recommendations to be made to the Board of Game, including discussions regarding pending proposals and development of an Agenda Change Request, Board members Stosh Hoffman and Jake Fletcher did not participate. They reserved taking any action at the working group level in favor of fully participating as Board of Game members.

The group has worked hard through two facilitated two-day workshops (in June and most recently in October 2024) to be in a position to make recommendations. These recommendations are based on conservative management to ensure long-term sustainability of the Unit 19C Dall sheep population, sharing impacts among user groups, and exploring novel approaches to address declining sheep populations and increasing challenges between interest groups. Our recommendations are based on the best science (western and traditional knowledge) available, and we encourage the Alaska Department of Fish and Game to continue to learn about sheep populations, specifically adding radio collars to better understand mortality issues. Regarding any form of predator control, the sheep working group wants to assure positive results without causing unintended consequences, clear biological objectives that are measurable, humane control methods if used, clear efforts to gain public support, and most importantly to let science guide any steps regarding predator control. At this time, the sheep working group wishes to see the guidelines above followed and the research documenting mortality prior to any predator control for sheep.

The Unit 19C sheep working group made a specific proposal recommendation based upon a guide concessionaire program being in place. If this program isn't in place in time, the sheep working group would like to meet again in April 2026 to explore alternative possibilities. The sheep working group will do its best to be present with all members for the Board of Game discussions to be held in Anchorage in March 2025. To further assist the Board and implement the working group's mandate, the team went through the existing proposals submitted to the Board and wish to make the following recommendations. The sheep working group supports proposal 92 recommending hunter education. The group neither supports nor opposes proposals 93-101, 110, and 115-117. The sheep working group opposes proposals 102-109, 111-114 and 118 because these proposals are inconsistent with our proposal to the Board.

Once again, the Unit 19C Sheep Working Group expresses its gratitude to the Board for putting their faith into the working group to propose recommendations and better understand and address

the key issues facing Dall sheep in Unit 19C. Most members of the working group support these recommendations.

Sincerely,

Unit 19C Dall Sheep Working Group

Enclosure: Unit 19C Working Group Membership Roster



## Alaska Board of Game

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### Unit 19C Sheep Working Group Members

Jerry Burnett, Board of Game, Chair

Stosh Hoffman, Board of Game Member

Jake Fletcher, Board of Game Member

Scott Crowther, Anchorage Advisory Committee

Brett Gibbens, McGrath Advisory Committee

Mike Litzen, Guide with Dall sheep hunting experience in Unit 19C

Michelle Quillin, Fall season Dall sheep resident hunter

Chait Borade of CIRI, Unit 19C private landowner

Patricia Owen, Denali National Park & Preserve, non-hunting use of Unit 19C

\*\*\*\*\*

Working Group members may be reached by contacting:

Kristy Tibbles, Executive Director, Alaska Board of Game

Email: [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov) | Phone: (907) 465-6098

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

**ACR #6** – Define the beginning and terminus of the Nine Mile trail in the Ladue River Controlled Use Area.

**SUBMITTED BY:** Alaska Wildlife Troopers

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

Alaska Administrative Code Number 5 AAC: 92.540(3)(I)(ii)

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

This controlled use area allows exceptions for use of motorized vehicles on the Nine Mile and Liberty Creek trails. Neither of these trails are defined in regulation as to their official start, terminus, or scope.

Recent development of a large mine in the area of the Nine Mile trail has caused a dramatic increase in vehicle traffic and new branches of trails have begun to appear making it impossible to know which trail(s) are the original Nine Mile trail and which are continuations or offshoots.

AWT has received numerous complaints annually about moose hunters straying beyond the original Nine Mile trail however enforcement has proved challenging without a clear delineation and definition of where the trail exists and/or ends.

**WHAT SOLUTION DO YOU PREFER?**

5AAC 92.540(3)(I)(iii). The Nine Mile Trail as referenced in this regulation refers to the single primary ATV trail beginning along the Taylor Highway at coordinates (1) N63 24.233 x W142 28.422, entering the western portion of the defined controlled use area at coordinates (2) N62 23.879 x W142 9.073, and terminating at coordinates (3) N62 32.420 x W141 27.995. Only the single primary trail including connected bypasses no more than 20 feet.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

This change will better define the beginning and terminus of the Nine Mile trail and uses the same GPS coordinates where Tok ADF&G has established markers designating the beginning and terminus of the trail. It additionally spells out that side trails and extensions are not considered part of the trail and thus motorized vehicles are not allowed in those areas.

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

When the exclusion for the Nine Mile trail was put in there was little ATV traffic on this trail and due to the remoteness of the area, there was little traffic to keep the trail established against overgrowth. The re-establishment of a large gold mining operation near the terminus

of the Nine Mile trail has introduced additional traffic that has caused the trails system to be expanded well beyond the original trail. A defined beginning and end to the excluded trail within the CUA is needed for enforcement to be able to properly charge violations by users taking motorized vehicles deeper into the CUA beyond the original established trail.

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

N/A

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

N/A

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

N/A

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

There will continue to be more motorized vehicle impact within the Ladue Controlled Use Area branching further and further off of the original established Nine Mile Trail. AWT will be unable to enforce many of these violations without a clearly defined beginning and end of this trail

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

This does not affect allocation of the resource as it merely defines a trail already listed as an exclusion to motorized access within a controlled use area. Further the points listed are the same used by Tok ADF&G to advise users where the trail system starts and ends and are also the locations where notices are posted. This ACR simply adds those GPS points into the regulation for enforceability by AWT.

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

N/A

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

The Alaska Wildlife Troopers are the primary enforcement agency for Alaska's Fish and Wildlife laws and regulations. AWT occasionally faces situations where the intent of the board or wildlife managers cannot be enforced due to incorrect, confusing or missing definitions that are required



for a successful legal action against a violator. AWT has had concerns with this particular situation within the Ladue CUA for more than a decade however until recently, very few people accessed the area via motorized vehicles and the trail system therefore was shrinking by overgrowth, not growing in size and scope.

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

It has not.

**ACR #7** – Change the opening date for moose hunting in Unit 22B Remainder from September 1 to September 6.

**SUBMITTED BY:** City of White Mountain

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

Regulation: 5 AAC 85.045(20) - Moose Hunting Seasons in Unit 22B Remainder

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

The current moose hunting season for Unit 22B Remainder is structured in a way that significantly limits the opportunities for local subsistence hunters in White Mountain. The season start date of September 1 coincides with poor hunting conditions that make it difficult for local hunters to access moose effectively.

Challenges and poor hunting conditions: Early September in the White Mountain region brings warmer temperatures, resulting in moose staying in higher elevations or more forested areas, which are difficult for hunters to access. Wet conditions and frequent high-water events during this time also make travel by boat or ATV hazardous, as hunters must cross rivers and marshlands that can become impassable. Dense vegetation at the start of the season reduces visibility, making it harder to spot moose.

Additionally, local subsistence hunters are facing inefficiency in their use of fuel. During the first five days of the season, it is rare for hunters in 22B Remainder to successfully catch moose. As a result, significant amounts of fuel are wasted as hunters drive up and down the Niukluk and Fish River and its tributaries searching for moose without success. If the season were to open on September 6, the likelihood of catching a moose would increase, thereby improving the efficiency of fuel use for local hunters.

This proposal seeks to address these challenges by changing the season start date to September 6 to better align with local hunting conditions, allowing White Mountain residents a fairer chance to harvest moose for subsistence.

**WHAT SOLUTION DO YOU PREFER?**

We propose changing the moose hunting season in Unit 22B Remainder from the current start date of September 1 to September 6. This adjustment would apply only to the 22B Remainder area (that portion of Unit 22B West of the Darby Mountains). The focus is on improving hunting opportunities specifically for the local community in 22B Remainder. The proposed new season in Unit 22B Remainder would open on September 6 and close September 20 unless closed by emergency order.

This solution balances the need to support local subsistence hunters while ensuring sustainable moose harvests in 22B Remainder.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

N/A

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

When the current regulations were adopted, they did not fully account for the specific challenges faced by local subsistence hunters in White Mountain. The early season start date of September 1, combined with challenging hunting conditions, puts local hunters at a disadvantage compared to non-local hunters who have greater access to transportation and better equipment.

The unforeseen effect is that local hunters must travel greater distances to search for moose, thereby increasing their risk, cost, and effort. Wet, high-water conditions, dense brush, and short daylight hours further hinder their ability to hunt successfully during this time. Hunters are spending every opportunity to be on the Niukluk and Fish River and its tributaries looking for moose burning ample amounts of fuel with a small chance of success. Changing the season start date to September 10 would alleviate these challenges and give White Mountain residents a more reasonable opportunity to harvest moose for subsistence as well as saving a lot of money in fuel costs.

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

No, there is no immediate biological concern. Moose population data for Unit 22B Remainder indicates a stable population with a high bull-to-cow ratio. Adjusting the season dates will not negatively affect the population.

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

While moose hunting is a relatively new practice in the Bering Strait Region, having only become common in the last 50 years, the unforeseen and unexpected event is the challenge of trying to catch a moose during the first days of the season in early September. The September 1 opening date may align well with the Nome School District schedule and Labor Day, providing people in Nome the opportunity to hunt over the long weekend. However, for the villages such as White Mountain and Golovin, the timing of the season opening in relation to Labor Day has little impact. People in the villages are primarily focused on

catching a moose to fill their freezers for the winter, and the urgency of that need remains regardless of a holiday weekend.

The unforeseen effect is that, due to the inefficiency of hunting in the first week of September in 22B Remainder, the effort to catch a moose increases dramatically without a corresponding increase in success. During the first days of the season, it is rare for locals to successfully catch moose, yet the fuel and time spent hunting are considerable. As a result, hunters in White Mountain face a significantly reduced catch-to-effort ratio and burn excessive amounts of fuel, increasing their individual costs.

By moving the season start date to September 6, the likelihood of catching a moose would increase, reducing the amount of fuel wasted and improving the efficiency of local hunting efforts. This change would allow White Mountain residents to hunt more efficiently, saving money and resources while still meeting their subsistence needs.

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

N/A

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

If this issue is not addressed, local subsistence hunters in White Mountain will continue to struggle to harvest moose, further exacerbating food insecurity and economic challenges in the community. The continued advantage for non-local hunters, combined with worsening environmental conditions during the early season, will widen the disparity between local hunters and those from outside the area.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

This ACR is not predominantly allocative. It seeks to address a timing issue specific to the 22B Remainder area that affects the ability of local subsistence hunters to participate in hunting, rather than redistributing resources among user groups. By adjusting the season start date this proposal aims to support local hunters without altering the overall allocation of moose in the unit.

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

N/A

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

The City of White Mountain is actively involved in this issue. Through ongoing discussions with local hunters, the city council, and community members, we have identified the challenges posed by the current moose hunting regulations. This ACR is submitted on behalf of the local subsistence hunters, who are significantly affected by the current regulations and seek an adjustment to ensure they can meet their subsistence needs.

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

This issue has not been previously considered as an ACR or as a formal proposal to the Board of Game.

**ACR #8**– Limit moose hunting permits in Unit 22B Remainder to one permit per household, establish smaller hunt areas within Unit 22B Remainder and limit hunters to one of those hunt areas.

**SUBMITTED BY:** City of White Mountain

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

Regulation: 5 AAC 92.052(7) and 5 AAC 92.052(20) - Limiting permits per household and restricting hunters to specific units in Unit 22B Remainder

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

Current moose hunting regulations in Unit 22B Remainder do not adequately limit hunting permits per household, nor do they restrict hunters to specific units. This results in a disproportionate number of non-local hunters overwhelming the area, which significantly reduces the opportunities for local subsistence hunters to successfully harvest moose.

Challenges: The lack of restrictions on hunting permits allows multiple members of a single household to acquire permits, leading to over-hunting in certain areas. Additionally, without requiring hunters to choose specific zones, hunters from outside 22B Remainder—especially from Nome—can saturate prime hunting areas, further decreasing local hunting success.

**WHAT SOLUTION DO YOU PREFER?**

We propose limiting the number of moose hunting permits in Unit 22B Remainder to one permit per household. Furthermore, hunters should be required to select a specific subunit within 22B Remainder to hunt in, rather than having unrestricted access across the entire unit. These measures would reduce hunting pressure in key areas and improve the opportunities for local subsistence hunters.

This solution would ensure a more equitable distribution of hunting permits and better align with the needs of local subsistence hunters, while preventing non-local hunters from dominating specific hunting grounds.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

**1) To correct an error in regulation.**

N/A

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

When the current permit regulations were adopted, they did not foresee the overwhelming number of non-local hunters coming into Unit 22B Remainder and dominating key hunting

areas. The lack of a permit limit per household, along with unrestricted access across the entire unit, has created an inequitable situation for local subsistence hunters in White Mountain.

The unforeseen effect is that non-local hunters, with better access to transportation and equipment, can outcompete local hunters for moose. Limiting permits to one per household and restricting hunters to specific subunits would help mitigate this issue and provide local subsistence hunters with a more reasonable opportunity to harvest moose.

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

No, there is no immediate biological concern. Moose population data for Unit 22B Remainder indicates a stable population with a high bull-to-cow ratio. Adjusting permit regulations will not negatively affect the population.

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

Yes. The current regulations did not anticipate the influx of non-local hunters into 22B Remainder, especially from Nome. As a result, local subsistence hunters are left with diminished opportunities to harvest moose. The lack of permit restrictions and specific subunit hunting requirements has made it difficult for White Mountain residents to effectively hunt in their traditional areas.

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

N/A

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

If this issue is not resolved, local subsistence hunters in White Mountain will continue to face difficulties in successfully harvesting moose. The lack of restrictions on permits and subunit selection will allow non-local hunters to dominate key hunting areas, further diminishing local hunters' ability to meet their subsistence needs.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

This ACR is not predominantly allocative. It seeks to address a permit distribution issue specific to Unit 22B Remainder, ensuring local subsistence hunters have a fairer opportunity to participate in hunting. Limiting permits to one per household and requiring hunters to select specific subunits

would not reallocate moose between user groups but rather ensure more equitable access for local hunters.

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

N/A

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

The City of White Mountain is actively involved in this issue. Through ongoing discussions with local hunters, the city council, and community members, we have identified the challenges posed by the current permit regulations. This ACR is submitted on behalf of the local subsistence hunters, who are significantly affected by the current regulations and seek an adjustment to ensure they can meet their subsistence needs.

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

This issue has not been previously considered as an ACR or as a formal proposal to the Board of Game.



**ACR #9** – Modify the resident and nonresident hunt structure for sheep in Unit 19C.

**SUBMITTED BY:** Resident Hunters of Alaska

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

Alaska Administrative Code Number 5 AAC: 85.055. Hunting seasons and bag limits for Dall sheep.

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

**Unit 19C Sheep Conservation Concerns**

**Continued Unit 19C Resident General Sheep Hunting Opportunity**

**Unit 19C Nonresident Sheep Hunting Opportunity after the Closure Period**

*(Note: we apologize for the length of this section below, but it is important that newer board members have the facts as to past board actions that led to the point we are at now)*

At the November 10, 2022, Agenda Change Request (ACR) meeting, the board took up ACR 12 submitted by Resident Hunters of Alaska (RHAK) that asked to consider limiting nonresident sheep hunters in Unit 19C out of cycle based on sheep conservation concerns.

The board voted unanimously to ***not*** accept RHAK ACR 12, saying it ***did not meet the criteria for acceptance because there were no conservation concerns for Dall sheep in Unit 19C.***

Minutes later, at the very same meeting, the board voted 6-1 to create a board-generated proposal that would close Unit 19C to all sheep hunting for five years, stating that ***there were valid conservation concerns for the sheep population.*** That proposal would become Proposal 204 to be heard out of cycle at the 2023 Southcentral meeting in Soldotna.

This overt manipulation of the public process – the board on one hand telling RHAK that our ACR did not meet the criteria for acceptance because there were no sheep conservation concerns, while on the other generating their own proposal based on sheep conservation concerns – should not have been allowed to happen and was carried out so that there would only be one out-of-cycle 19C sheep proposal (the board's) before the board at the 2023 Southcentral meeting.

Board-generated Proposal 204 was deliberated at the 2023 Southcentral meeting. The board amended the proposal to exempt resident sheep hunters from the 19C closure. A resident closure or any new limits on resident sheep hunters was deemed not necessary. The proposal then passed to close Unit 19C to nonresident sheep hunters for five years.

There were a lot of questions and backlash after the board closed Unit 19C to nonresident sheep hunting. The board decided to create a new Sheep Working Group (SWG) that would focus solely

on Unit 19C sheep management concerns and provide recommendations to the board at a future date.

The 19C SWG was formed in late 2023, with six public members and three board members. A facilitator was hired, and the group was to hold meetings in 2024.

2024 was also the year for the in-cycle Interior Region III board meeting, which includes Unit 19C. There were several public proposals before the board regarding Unit 19C sheep hunting, to include reversing the nonresident closure, as well as Proposal 82, from RHAK, asking to reopen Unit 19C sheep hunting for nonresidents, but limit nonresident sheep hunters in 19C to draw-only permits with a limited allocation.

All the 19C sheep proposals before the board at the 2024 Region III meeting were submitted on time by the May 1, 2023, deadline, nearly a year before the board would hear them. But the board deferred all the in-cycle 19C sheep proposals another year out to the 2025 Statewide meeting, stating that they did not want to make any decisions on Unit 19C sheep until after the SWG recommendations were submitted. They would take all the deferred proposals up along with the SWG recommendations at the same time.

That action amounted to more circumvention of the public process and smacks of favoritism to the 19C SWG recommendations that can only come before the board via an ACR from the group, due by the November 1, 2024, deadline.

The 19C SWG met in mid-October 2024 to finalize recommendations to the board. Six members of the nine-member group supported an ACR asking the board to include resident sheep hunters in the 19C sheep hunting closure during the 2025 season, make all sheep hunting in Unit 19C during the 2026 and 2027 seasons draw-only hunts (with 80 percent of the permits going to residents and 20 percent to nonresidents), and if the Guide Concession Program to limit guides in 19C was not in place by 2028, then the SWG would meet again to discuss other recommendations.

Based on the information coming out of the 19C SWG, that they will submit an ACR that is in effect a new Unit 19C sheep management allocation plan, and the board's seeming willingness to accept it and hear it out-of-cycle at the 2025 Statewide meeting with all the deferred public proposals, RHAK is submitting this ACR to the board (that includes new data) for the same type of management allocation plan consideration.

## **WHAT SOLUTION DO YOU PREFER?**

### **ACR SUMMARY – 19C SHEEP MANAGEMENT**

**Resident sheep hunting opportunity in Unit 19C remains open under a general season.** Continued general resident sheep hunting opportunity August 10 – September 20 does not pose a conservation concern for sheep in Unit 19C at this time.

**Nonresident sheep hunting in Unit 19C remains closed until such a time that a draw permit system is in place to limit nonresident sheep hunters.** The season then remains the same, August 10 – September 20. The board should set a conservative “up-to” number of permits and give the

Department the authority to determine the number of permits allocated, with the intention that nonresident sheep hunters and their guides don't overwhelm the area and continue to cause conflicts in the field.

Alternatively, **if a Unit 19C Guide Concession Program to limit the number of guides and their sheep-hunting clients in the unit is implemented, nonresident sheep hunting can again be allowed, but it should also be under a draw permit system with a limited allocation** (*any nonresident draw permits would essentially go to the guided hunter booking with the guide with an exclusive concession*).

Should there come a time when the sheep population in Unit 19C further declines and it is determined that resident sheep hunters need to be limited under a draw permit system along with nonresidents, **the allocation of permits shall be a 90/10 split as in other areas where both resident and nonresident sheep hunters are on a draw permit system: 90 percent to residents, and 10 percent to nonresidents.** Nonresident second-degree-of-kindred (2DK) permits shall be placed in the nonresident pool of tags.

**STATE IN DETAIL HOW THIS ACR MEETS THE FOLLOWING CRITERIA:**

- 1) To correct an error in regulation.**

N/A

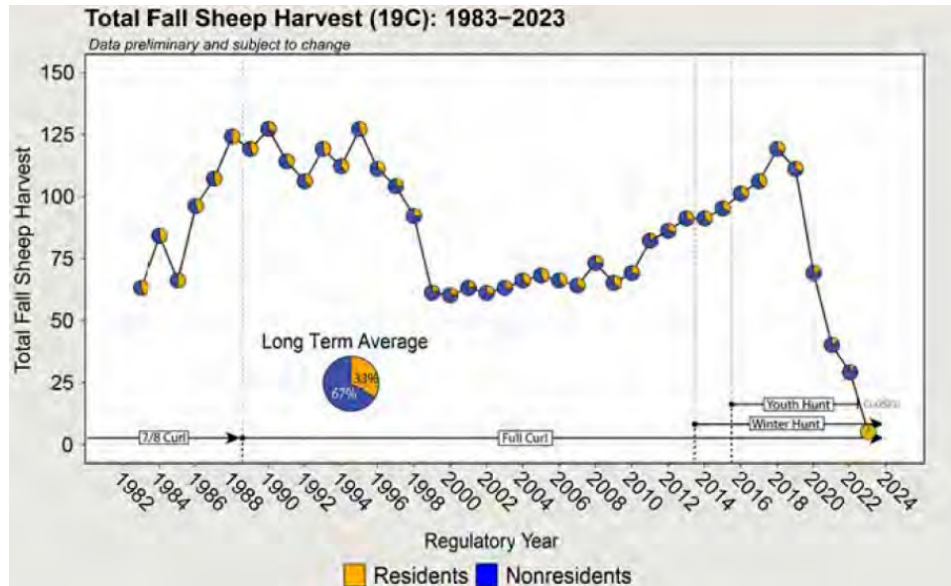
- 2) To correct an effect of a regulation that was unforeseen when a regulation was adopted.**

N/A

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

The board has identified a conservation concern for Dall sheep in Unit 19C if continued unlimited nonresident sheep hunting is allowed and used that as justification for closing nonresident sheep hunting for five years (2023-2027).

In the ADF&G chart below, you can see that 19C sheep harvests started to drop dramatically in 2019, which correlated with the observed sheep population decline from the Department's aerial trend count surveys:



Nonresident sheep hunters have always taken the majority of the sheep harvest in Unit 19C, but as the ADF&G chart below shows, the percentage of nonresident sheep harvests increased dramatically as the sheep population declined:

## Contemporary Trends (2013-2022)

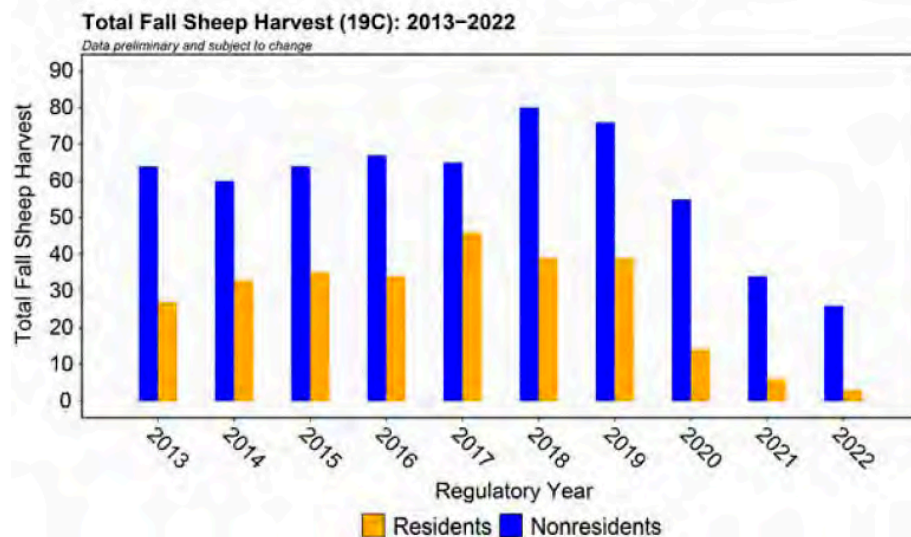


Figure 3. Total annual sheep harvested during the fall general season (GS000) from RY13 to RY22. Color indicates total fall resident (orange) and nonresident (blue) sheep harvested each year.

In 2022, the last year nonresident sheep hunting was allowed, nonresident sheep hunters took 26 sheep (90% of the harvest), while residents took three sheep.

The board decision to exempt resident sheep hunters from their own closure request at the 2023 Southcentral meeting was based on the rationale that resident sheep hunters were not

a part of the problem. Clearly there was a harvestable surplus of rams in the unit for a general resident sheep season, while also maintaining the resident winter subsistence sheep hunt.

In the subsequent two seasons where only resident sheep hunting was allowed in Unit 19C, the resident participation and harvest was:

Year	Unit	Resident Hunters	Sheep Harvested
2023	19C	49	5
2024	19C	~40	10 ( <i>preliminary ADF&amp;G data</i> )

It is not expected that the number of resident hunters, or resident sheep harvests, will dramatically increase while the area is closed to nonresidents.

The 2024 aerial trend count survey below showed a bit of good news, with a higher number of total sheep from the previous year and higher lamb recruitment, but of course we don't know what mother nature will bring this winter, and we won't know until next year how many of those lambs made it through their first year.

### ADF&G Chart

Table 1. Cumulative 19C Aerial Survey Data

	2010	2013	2014	2015	2016	2017	2019	2023	2024
Approx. Area (mi2)	453	453	453	453	453	453	453	453	453
Total Rams	348	268	374	301	255	343	202	98	101
Legal Rams	56	60	55	46	53	60	33	13	16
Sublegal Rams	292	208	319	255	202	283	169	85	89
"Ewes"	864	490	639	499	593	697	390	242	247
Lambs	287	94	168	167	195	266	178	73	120
Lambs:100 "Ewes"	33	19	26	33	33	38	46	30	49
Rams:100 "Ewes"	40	55	59	60	43	49	52	40	41
Legal Rams:100 "Ewes"	6	12	9	9	9	9	8	5	7
Sublegal Rams:100 "Ewes"	34	42	50	51	34	41	43	35	36
% Lambs	19	11	14	17	19	20	23	18	25
% Rams	23	31	32	31	24	26	26	24	21
% Legal Rams	4	7	5	5	5	5	4	3	3
% Sublegal Rams	19	24	27	26	19	22	22	21	19
Total Sheep	1499	852	1181	967	1043	1306	770	413	473

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

N/A

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

Yes, there is currently a harvestable surplus of sheep in Unit 19C for resident sheep hunters under a general season opportunity. But the board may be considering eliminating, or

limiting, resident sheep hunting opportunity in Unit 19C out of cycle in 2025. There are currently no deferred Unit 19C proposals before the board that ask to eliminate resident sheep hunting opportunity.

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

The “Regular Cycle” public process has been circumvented by the board. On top of that, the newer 3-year cycle just makes this all worse in terms of making any needed changes between regional meetings.

The board has chosen to form a 19C Sheep Working group, decide the makeup of that group, and then take recommendations from that group regarding 19C sheep management and allocations via an ACR. Based on that, and even though resident sheep hunting in Unit 19C is currently allowed, we believe that resident sheep hunting opportunity may be limited or shut down altogether before the next Region III cycle.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.**

N/A

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

This request is indeed allocative, in the sense that it wants to ensure resident sheep hunters in Unit 19C don’t lose opportunity and asks to limit nonresident sheep hunters to draw-only permits. RHAK has conservation concerns for the 19C sheep population if unlimited nonresident sheep hunting is again allowed. But we don’t believe continued resident general sheep hunting opportunity poses a sheep conservation concern. Resident sheep hunters do not need to be denied opportunity, nor do they need to go on a draw permit system. We would like the board to consider our ACR in the same vein as they do the ACR from the 19C SWG, which is also allocative.

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

Alaska Hunting Conservation Organization

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

See our comments above on ACRs RHAK has submitted in the past regarding Unit 19C sheep issues. RHAK currently has a deferred proposal (#82) about 19C sheep issues that will be heard at the 2025 Statewide meeting. That proposal was submitted on time, prior to the May 1<sup>st</sup>, 2023, deadline, a year and a half ago, after consultation with ADF&G biologists and speaking to hunters and guides in Unit 19C.

Since that time, of course new information is available that is not included in our deferred proposal that was submitted on time. But the only avenue the board gives us to submit a new proposal with new information is via an ACR.