



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION
Headquarters

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November 7, 2024

An Agenda Change Request (ACR 9) has been submitted to the Alaska Board of Game (board) requesting to change 5 AAC 85.055. The proponent asks the board to: 1) maintain resident sheep hunting in Unit 19C by general season harvest ticket, 2) keep Unit 19C closed to nonresidents until a drawing permit can be established, 3) if a Guide Concession Program is established, offer nonresident hunting opportunity by drawing permit, and 4) if the sheep population declines to the point where residents need to be restricted, create a drawing permit hunt for both residents and nonresidents with a 90% allocation to residents and a 10% allocation to nonresidents.

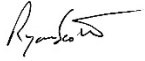
With respect to the board's Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.
- C. Biological concerns: Sheep trend counts in Unit 19C indicate there was a large decline in total sheep numbers beginning after the winter of 2018/2019. Surveys in 2024 continue to show low numbers and this trend is largely thought to be based on winter weather events. In response to public concerns over sheep populations, the board formed a Unit 19C sheep working group to address sheep management in Unit 19C.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is unaware of any unexpected resource situation that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action. As written, this ACR would institute regulatory action that would preclude a biologically allowable resource harvest opportunity for Regulatory Year (RY) 2025. Full-curl management allows for continued, conservative harvest of mature ram sheep.

There is a positive customary and traditional use finding for sheep in Unit 19, and an amount reasonably necessary for subsistence of 1-5 sheep. In March 2023, the board passed Proposal 204 which closed the Unit 19C youth hunt as well as all nonresident hunting for a 5-year period. The general season fall hunt (harvest ticket) for residents remains open from August 10 – September 20. There is also a winter registration permit hunt (RS380) for residents only, October 1 – April 30, with a bag limit of one sheep with $\frac{3}{4}$ curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited. The structure of this hunt provides subsistence opportunity according to the pattern of customary and traditional uses. RS380 was closed by emergency order in RY20 and has had a restricted bag limit of rams only since RY21 due to biological concerns created by the harvest of ewes.

The next regularly scheduled board meeting for Unit 19 is during winter/spring of 2026/2027. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2025 Statewide meeting in Anchorage to allow for more public input and so the board can address it with the Unit 19C sheep proposals that were deferred from the March 2024 Board of Game meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Scott", with a stylized flourish at the end.

Ryan Scott
Director
Division of Wildlife Conservation