

On-Time Comment Index

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Name: Aaron Bloomquist

Community of Residence: Palmer, Alaska

Comment:



PC01

Honorable Board Members,

As an active participant in Dall Sheep Management in Alaska for over 20 years, I would like to simply state some FACTS that many forget in these discussions, or chose to ignore in favor of emotional, non-fact based arguments. I was a participant in the original "Sheep Working Group", have served over 20 years on AC's (4 as chair of Anchorage AC), and currently chair the Big Game Commercial Services Board (these comments are my own, not as a member of the BGCSB). I have analyzed volumes of ADF&G sheep data including compiling average age of harvest by area for the original sheep working group among other data sets that ADF&G should have provided.

First, there is ZERO biological need to change from our standard Full Curl/8year old management method. This fact has been reiterated every time we have decided to use some other type of method for social reasons. Most recently, ADF&G stated this fact during the original 19c discussion but it seems that a local biologist undermined the narrative to some extent for social reasons. It was stated definitively when 13D went to a draw, and that decision was made to preserve an experience, and to mitigate crowding (again a social decision). Before that, it was stated when the TMU went to a draw to manage for trophy rams (social decision). It was stated when Delta and Mt. Harper went to draw to preserve an esthetic wilderness experience (social decision). We have enough sheep in hunted areas right alongside closed National Park Units to show that hunting is simply not a factor in the overall populations of Dall Sheep. These NPS closed areas provide a great "control" area to observe populations and they have shown populations at the same level, within a fairly small margin of error. If we had the luxury to manage any other animal on an 8-year old average harvest, with only male take, we could literally have a year-round season and no bag limit and still have enough breeding age males to maintain the breeding of females in the population. Yes, we have some sheep taken under 8 years of age but 95% of the state has averaged over 8 long term. This is unarguably true for all species we hunt in Alaska, including slower breeding animals such as bears and goats. For moose and elk, if we could manage for 8-year-old take, we would have large trophies that were not even legal yet (as we do occasionally with sheep). Caribou and deer would have the majority of males die before they even become legal.

Second, sheep management is largely self limiting with population fluctuations. We have seen effort and take, both in resident and nonresident statistical categories fluctuate with populations. It may take a couple years for everyone to figure it out, but in the mean time, we are still taking rams that average over 8 years of age. There may be small fluctuations in things like hunter success and sublegal take, but, in the end, most hunters adapt to the resource available.

Third, any time we make a drastic management decision, it adversely impacts other areas. I have been in the Eastern Brooks Range sheep mountains for about 20 years and have personally witnessed the fluctuations due to regulatory decisions. This is the most remote sheep hunting area and the most expensive to access. When the Chugach went on draw, we saw a marked increase in pressure. Now that 19c has had a drastic management decision, we have had an increase in pressure like no one has ever seen. Even though it was 100% on the back of nonresidents and guides, the residents also think there are no sheep left and have relocated. This trend has worsened exponentially in the couple years since the BOG closure. I have talked to many of these new-to-the-area hunters and 90% or more of them would have been hunting the Western Alaska range and NONE of them have even tried to look for sheep in 19C since the board decision. I also know a couple hunters that stuck in 19c and have been successful every year since. I was woken up by airplanes flying and looking for sheep at least once per day (the arctic has flying light early morning and late evening) from August 4-25th this year. We had a legal ram chased away by a plane on the 8th that I didn't relocate in 15 days of hiking. Even the ewes were acting very weird and spending more time in the rocks and high places. The passage of the no-fly-and-spot reg slowed down the flying for a while but now the cub guys know there is zero enforcement.

Fourth, we have far fewer sheep hunters than at any time in a few decades but the country seems more crowded than ever. People are less willing to be in the same area as other hunters without causing a "conflict" or thinking the simple fact someone else is present is a "conflict". Much of this is due to the fact that the average sheep hunter has much more

money and resources invested than in the past. Guides have relatively similar equipment as they did 30 years ago and use similar areas, although with far fewer hunters, but those hunters are paying 700% more than they were 30 years ago. Residents are fewer also but many have very expensive planes and lots of money to spend flying and relocating. This effort and investment in both categories makes people feel entitled to the area. This attitude makes the country seem more crowded, when, in reality, it is not. Add fewer sheep, almost statewide, and the anxiety of another person in "your spot" is amplified.

In summary, the 19c decision was not necessary biologically and has adversely impacted other areas. If this type of draconian decision is left to stand we are probably on our way to a statewide method change for social reasons (not biological). This fact bumps up against Article 8 constitutional questions. With these changes, are we managing for "sustained yield"? We will certainly not be managing at anything close to "maximum sustained yield". Are we really managing for the "maximum benefit of the people" (which the courts have directed the board to consider all "Alaskans" as "people", not just hunters); or will we be managing for maximum benefit of the few luck sheep hunters that can draw a tag; or maximum benefit of resident sheep hunters over the economic benefit of a guided sheep hunt which brings new money to the state and helps the ALL the "people" that don't hunt?

Please overturn the 19c decision and return nonresident management to the tried and true full curl/ 8 year old method that allows for sustained yield and maximum benefit for Alaskans.

Thank You!

Name: Scott Collins

Community of Residence: Anchorage, Alaska



PC02

Comment:

I've hunted dall sheep in GMU 19C since 2005, as an Alaska resident on personal hunts. The ability to hunt sheep each year is a deeply valuable experience, an important aspect of my identity, and something that I don't take for granted. I appreciate this working group considering how to ensure sheep hunting opportunities continue to be maximized for Alaska residents. I would like to share several perspectives on how we can accomplish that goal.

1) Alaska has historically experienced significant reductions in our sheep populations. It takes many years, but our sheep populations have rebounded from each of those declines. Those rebounds have occurred while maintaining the ability of Alaska residents to hunt sheep every year with a harvest ticket. For the sake of current and future generations of Alaskans, I hope we continue to value and prioritize resident sheep hunting opportunities that are core to the hunting culture of our state. It would be a shame for a short-term reduction in sheep populations to be used as an "excuse/reason" to limit resident hunting opportunities over the long-term.

2) Resident sheep hunting harvest and success rate is low relative to non-resident sheep harvest. In recent history, the majority of sheep harvest in 19C has been by non-resident hunters. In 2022, 90% of all sheep harvested in 19C were by non-residents. In 2022, resident hunters only took 3 sheep in 19C. In 2023 the BOG wisely closed non-resident sheep hunting in 19C, and residents only harvested 5 sheep (after taking only 3 sheep in 2022). Restricting resident sheep hunting in 19C, or other parts of the state, is unnecessary, will not result in the population rebounding quicker, and will push more sheep hunters to other areas of the state causing increased crowding and hunter conflicts.

3) We need to recognize the reality of non-resident demand for hunting in Alaska, particularly sheep hunting demand. For practical purposes, non-resident demand for Alaska hunting is virtually unlimited. The demand far exceeds what

the resource can bear and this is a trend that will continue to get worse. All other US Western states have recognized that non-resident demand will overwhelm hunting by residents in their own state. As a result, ALL other Western states significantly limit non-resident hunting through a draw permit process, while at the same time maintaining significantly more opportunity for their resident hunters. Although it varies a little from state to state, most Western states allow non-resident hunters to have permits for 10% or less of the sheep harvest. With that perspective, it's wildly beyond reason to allow non-residents to harvest 20% or 50% or 90% (as was the case in 19C in 2022) of the sheep harvest. We need to recognize that there is an allocation issue that must be addressed. It can and should be addressed while preserving resident hunting opportunity. Alaska has precedent for recognizing the need to limit non-resident harvest without limiting resident harvest. A great example is black bear hunting in Southeast Alaska. Years ago it was recognized that non-resident harvest was the driver of unsustainable harvest. As a result we now require non-residents to draw a permit to hunt black bears in that area while continuing to allow residents to hunt using harvest tickets. I suggest this is a good model to use for managing sheep hunting, including in 19C. We should require non-residents to draw a permit to hunt sheep while allowing resident hunting to continue under existing regulations and bag limits using harvest tickets. This is the most impactful action we can take to preserve the opportunity for current and future generations of Alaskans to continue to hunt sheep.

Thank you for your work in this working group.

Scott Collins

Anchorage, Alaska

Name: Robert Fithian

Community of Residence: Anchorage, Alaska

Comment:



PC03



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October 14, 2024

Comments Regarding GMU 19C Dall's Sheep Management and

Hunting Seasons Dear GMU 19C Dall's Sheep Working Group,

These comments are provided to you from a Alaskan conservationist and professional guide who has been active in the field guiding hunters within GMU 19C for well over forty years.

My experience in the conservation arena includes:

Twelve years of dedicating fifty days a year to the Board of Game process as Executive Director of the Alaska Professional Hunters Association.

Several appointments and terms served from Alaska Governors to a National Park Service Subsistence Resource Commission.

Two appointments and terms served from the combined Secretaries of Interior and Agriculture to a White House Hunting and Wildlife Conservation Council in which I represented Americas hunting industry relative to wildlife conservation.

Presented numerous presentations throughout North America about wildlife conservation in Alaska of which many were focused on predator/prey relationships.

Presented presentations at climate change symposiums/seminars and debates relative to impacts on wildlife conservation in Alaska.

Provided ADF&G McGrath numerous comprehensive written reports of wildlife and range conditions within that portion of GMU 19C that I operate from.

Comments:

1. Dall's sheep management has a long and proven success history by utilization of the full-curl concept. This management tool recognizes that harvest of 8 YO full-curl or older class rams does not affect annual recruitment.
2. The full curl law has held and maintained its performance ground. No matter how many older age class rams are harvested or die of natural causes, recruitment is still viable and sustainable through the less than full curl or eight-year-old rams. Harvest or die off of older aged rams has little or no effect on recruitment.

3. During the ensuing years after the 1989 and 1991 Alaska ballot initiatives passed which stripped the State's effective ability to manage our wolf populations, Dall's sheep, moose and caribou populations within my historical operating region within 19C dropped from moderate to Low-Density Equilibriums (LDE).
4. My historic records from the early 1980's to 1998 relative to the region I operate within, reflect annual sighting on average of 340 Dall's sheep per year.
5. Since the late 1990's Dall's sheep annual sighting by my records has numbered less than 100 within the region I operate within.

During the same period of time (1988 – 2020) 19C went through the following relative to Dall's sheep:

- a. Subsistence utilization/dependency was much greater than it is now as the Nikolai, Telida and McGrath human populations were much higher then. Additionally, the GMU19D East Predator Management Program has worked well to maintain healthy moose populations within that community dependent region while the historical and traditional subsistence use areas within 19C have dropped to LDE.
- b. Alaska lost the former guide area system which had restricted commercial impact and provided a level of conservation. (1988 Owsichuk Decision) That action put the guide industry into a near free for all, especially on SOA lands and GMU 19C.
- c. Alaska also lost the Guide License and Control Board (1989 legislative sunset) and subsequent guide licensing increased to over 100 new registered guides per year. (up from 6- 10 per year) Most of the newly licensed guides focused on State of Alaska lands like 19C as they provided easy to achieve commercial permitting.
- d. Due to items b. and C., the number of licensed guides registered within the GOUA which I operate within 19C went from 3 to 14.
- e. Also during the late 1990's to current, we had several harsh winter

years which have also contributed to the LDE factor.

- f. **Still, due primarily to the full curl law, the Dall's sheep numbers have allowed for sustainable hunter harvest levels without imposing restrictions on hunting, and without hunting by humans having any impact on annual recruitment.**

2024 BOG and Legislative actions have been adopted/passed that have created two important wildlife conservation measures for GMU 19C:

- **BOG development of Intensive Management for GMU 19C.**

Although this initiative is focused on helping 19C moose which is has been held in LDE for many years, there will be associated positive impact on all prey species.

- **Legislative passage of Guide Concession Program to be initiated in GMU 19C.**

This program will ultimately control commercial effort and harvest of Dall's sheep by professional guide service business who operate within GMU 19C.

You as a working group should strongly support and encourage both measures.

Regarding your continued work as a Subcommittee:

Over many years I have watched and often participated in numerous BOG subcommittees and, I submitted a BOG proposal to create yours.

My recommendation for you at this time would be to look carefully at your objectives and finalize your recommendations to the BOG promptly. You do not necessarily need a consensus and the BOG needs your recommendations sooner than later.

The history of full-curl management, the creation of a Guide Concession program and the added benefit of a predator management program within GMU 19C will provide for sustainable Dall's sheep harvest by human hunters.

General hunting season dates for Dall's sheep within 19C should stay as it has been for many years: Aug. 10 - Sept. 20 for both residents and nonresident hunters.

In no way should you support a drawing permit program for 19C Dall's sheep. The end result of that concept does not fit 19C nor the long and arduous effort to create the Guide Concession Program.

Strongly support the development of the Guide Concession Program.

My 2023 and 2024 observations of the Dall's sheep population, habitat and feed within the GMU 19C region I operate within support the comments and recommendations contained within this letter.

Respectfully Submitted:



Robert R. Fithian

Name: Lucas Hickle

Community of Residence: Wasilla, Alaska



PC04

Comment:

I am a lifelong Alaska resident who has hunted 19C my entire life. The guides have always had a significant advantage to hunting in this unit compared to residents. The amount of money they charge makes them able to fly around and spot every moving creature in the mountains. I work a full time job as an Alaskan resident. I cant afford to do their level of spotting and compete with them. We also can't always make it up for the opening of day of hunting season with our work schedules. Without a doubt, the guides who do it for a living will be up there and be posted up on any legal ram in the first week of the season. These are a couple of the big reasons that guided hunters have had significantly higher levels of success and harvest rates of sheep than residents in 19C.

I believe it was a great decision by the board to close down all Non-Resident hunting before abruptly changing it for the residents. The thing I care most about is the long term stability of the sheep population in 19C. If they need to reduce the number of sheep harvested, it needs to come from people who kill the most sheep (the guides/nonresidents). I think that science backs up the full curl conservation theory, and I hope they allow us residents the ability to harvest sheep for the remainder of the time it is closed for Non-Residents. I think we should look at the data that comes from this to see if we can open it back up to Non-Residents in future years.

My recommendation are:

Keep Sheep hunting in 19C closed to Non-Residents to see how the sheep populations trend.

If Non-Resident sheep hunting ever opens back up in 19C, the rules have to change to level the playing field with Resident Hunters. Give residents an opportunity to harvest the rams we spot in the preseason. If a guide sees a nice ram they'll be posted up on it before residents get the chance. The harvest rates should be closer to 80% residents; not the other way around.

Season as follows:

Resident-August 10th-September 20th

Non Res- August 15th-September 20th.