



Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION
Headquarters

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November 14, 2022

An Agenda Change Request (ACR 12) has been submitted by Resident Hunters of Alaska to the Alaska Board of Game requesting to change 5 AAC 85.055(a)(4) Hunting seasons and bag limit for Dall sheep. The proponent is asking the board to limit or restrict all nonresident sheep hunting in Unit 19C with a preferred option to implement a draw for nonresidents with up to 20 permits issued.

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. Due to large scale weather events, sheep populations have declined in many areas of the state, including 19C. Although populations in some areas of the state (including 19C) appear to have declined by 60-70%, current harvest and regulations are not responsible for the decline. In Unit 19C harvest in the two most recent years was down to 40 and 29 sheep, down from an average of 96 from 2011 through 2020. The department currently estimates that harvestable surplus on this population, absent additional changes to composition or abundance, would be 20-30.
- D. There is a winter registration permit hunt (RS380) for residents only with a bag limit of one sheep with $\frac{3}{4}$ curl horn or smaller, excluding rams with both tips broken, lambs, and ewes with lambs during October 1 – April 30. While the regular sheep season can provide for subsistence opportunity, the winter registration hunt was structured specifically to provide 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 for RY21 and RY22 due to biological concerns associated with the harvest of ewes.
- 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.

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. There is a youth hunt from August 1-5 and an unrestricted fall hunt (harvest ticket) for both residents and nonresidents from August 10 – September 20. Fundamental to the full-curl strategy is the concept that the older ram age classes that are targeted are also numerically few, resulting in minimal harvest at the population level. However while full curl rams are few in number they are an important component of the population.

In 2020 ACR3 was submitted to the Board which would have closed the Unit 19C general sheep season to all hunters for 2 years or shortened the season from August 10-September 20 to September 10-20. The Board did not accept the ACR because the Department has emergency order authority to close or shorten

seasons. In 2021, ACR 4 was submitted to the board, and was accepted. The proponent (Resident Hunters of Alaska) asked the board to limit or restrict all nonresident sheep hunting in Unit 19C with a preferred option to implement a draw for nonresidents with up to 30 permits issued. The board did not adopt this proposal (Proposal 267) when it came before them in 2022.

The next regularly scheduled board meeting for Unit 19 regulations is during winter/spring of 2023/2024. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2023 meeting in Soldotna to allow for more public input.

Sincerely,

A handwritten signature in cursive script that reads "Ryan Scott".

Ryan Scott
Assistant Director
Division of Wildlife Conservation