
ALASKA BOARD OF GAME

Committee meeting regarding Unit 19C sheep

Web Conference | November 17, 2023

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**Fairbanks
Fish & Game Advisory Committee**

**Interior Region
Fish & Game Advisory Committees**

John Siegfried
Chairman
3081 Monteverde Road
Fairbanks, Alaska 99709

Central	Middle Nenana River
Delta Junction	Middle Yukon River
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October 12, 2023

To: Alaska Board of Game – Unit 19C Sheep Working Group Committee

Re: Unit 19C Sheep Working Group Formation

Dear Chair Hoffman and members of the Unit 19C Sheep Working Group committee,

The Fairbanks Fish & Game Advisory Committee (FAC) met last night, October 11th, and discussed the upcoming Nov. 17th meeting of the Unit 19C Sheep Working Group (SWG) committee and the public notice soliciting comments from the public about the formation of the SWG.

We voted unanimously in support of the inclusion of a representative from the FAC on the Unit 19C SWG to represent the interests of our constituency, who hunt sheep in various units within the state. This is not just a “local” issue whereby only the Advisory Committees that oversee Unit 19C should be represented. The FAC should be represented on the SWG and have a voice in any new sheep management plan and framework for Unit 19C.

Sincerely,
John Siegfried - Chairman



Dear Alaska Board of Game Members

The Alaska Wild Sheep Foundation (AK WSF) would like to submit the following comments for the Board of Game special November 17th meeting regarding Unit 19C sheep. The AK WSF concern remains that we are focused too much on the hunting allocation issues in 19C and not on the conservation aspects that would help guarantee the natural recovery of Dall sheep in 19C and the State.

AK WSF is an Alaska tax-exempt, non-profit corporation with our mission focused on wild sheep conservation in Alaska. We have a membership of approximately 800, mostly in Alaska but also members in Canada, lower 48, and Mexico who share a passion for the resource. As stated, our focus is on conservation of the resource so we do our best to remain neutral on allocation questions unless they have a definite conservation impact.

The Problem: Dall sheep numbers in unit 19C and throughout much of the State are extremely low – maybe at an all-time low.

According to ADF&G biologists the problem is likely natural, brought on by a series of bad winters, continuous predation and other similar factors.

There is no indication that the current problem was caused by over-hunting or human activities in general.

The solution to the root problem therefore should be a conservation plan aimed at helping guarantee the regeneration of the resource and only then if we are convinced that there is a harvestable excess should the allocation issues be addressed.

Development of a comprehensive conservation plan will require the inclusion of technical experts (i.e., biologists, preferably more than one to facilitate multiple perspectives). It also necessitates the inclusion of land owner and land manager representatives and possibly other staff representatives to guarantee buy in to the plan and ensure success during the execution phase of any approved plans. A good plan may also require significant additional outside resources to execute properly.

Based on these views, our suggested composition for the working group would include but may not be limited to:

- Representative from F&G Advisory Committee/Resident 19C Hunter
- Subsistence hunter from 19C
- Guide who operates in 19C



- Alaskan sheep hunter from outside 19C
- Representatives from each major land owner in or adjacent to 19C (CIRI, Park Service Rep, etc.)
- An individual who uses 19C for other uses and is familiar with the area
- 2x State Sheep Biologists (AB area 19 and one other)
- Federal sheep biologist
- Board of Game Member
- DNR Representative
- Other staff representatives if required

Note: Individuals who can fulfill the requirement of more than one category will help reduce the number of players so the working group remains manageable.

AK WSF and other non-governmental conservation organizations can help provide the additional resources and public support necessary to accomplish a more comprehensive plan.

We can look at the current situation as a crisis or an opportunity. Although Nature will be the greatest determining factor, we must challenge ourselves to seek meaningful ways to enhance our field management of this important resource to facilitate and guarantee a natural recovery.

Kevin J Kehoe, President
Alaska Wild Sheep Foundation
(907) 868-8821
kevinkehoe@alaskan.com



Submitted by: Cody Doig

Community of Residence: Eagle river ak

Comment:

As an avid bow hunter that moved from the lower 48 to Alaska, I can fully appreciate the difficulty of managing the resource when demand is increasing but supply seems to be diminishing.

During other big game, season structure evaluations, I have seen state agencies successfully implement archery only seasons as management tools. The benefit of the archery only limitation is the ability to limit harvest while maintaining opportunity. This, of course, has its limitations, depending on participation, but it also serves as a stopgap to allow the state agency to pause and evaluate extraneous factors, influencing, ram mortality. In other words, it's a nice mechanism to allow the state agency to maintain opportunity without affecting harvest, or take, to provide enough time to evaluate constantly evolving data, surveys, etc.

The other advantage, while I support the current restrictions on non-residents, is that non-residents could be brought back into the fold to the benefit of guides and outfitters as archery-only clients.

Regardless, I appreciate the difficulty of the issue, and the complexity of the data and socioeconomic factors. Sheep hunting is a dream for some of us. It makes good sense to do what we can to protect the sheep and the culture in Alaska.



United States Department of the Interior

NATIONAL PARK SERVICE

Denali National Park and Preserve

P.O. Box 9

Denali Park, Alaska 99755

November 7, 2023

Dear Members of the Alaska Board of Game,

Thank you for convening a working group to discuss the future of sheep management in GMU 19C. Given the range-wide decline in Dall's sheep, this is a significant step to further our collective understanding of the status and utilization of the sheep bands in this area.

The sheep range within Denali National Preserve (south) GMU 16B and 19C are contiguous with sheep ranges outside the NPS boundaries within GMU 19C. The NPS conducts occasional sheep surveys and hunting patrols on these lands. I recommend that a National Park Service (NPS) Wildlife Biologist be considered for the working group. The NPS would be pleased to participate and provide capacity to this important working group. Please contact Dave Schirokauer at dave_schirokauer@nps.gov or 907-683-9605 if you would like to discuss further.

Thank you for your consideration,

Brooke Merrell

Brooke Merrell
Superintendent Denali National Park and Preserve
Brooke_Merrell@nps.gov



Board of Game:

These observations and commentary are from a research paper following the earlier Board of Game Dall sheep management planning gambit. That failed exercise was before any current Board member experience except, perhaps, Board Member, Hoffman. The present exercise seems dangerously destined to repeat that failure.

The essence of these comments I've reproduced for you after analysis of that failure is that management planning is an **administrative activity** the Board, by statute, can't do (see below). Planning on how to make a plan is **even more 'administrative.'** The Board's earlier foray into a 'Dall sheep working group' was an expensive and abject failure. The Board would be wise to consider it's own statutory purposes: what it's statutory 'management requirements' are, and what the Board is specifically forbidden from doing....which is exactly what your present exercise regarding GMU 19C looks like from this perspective.

I suggest it would be wise to drop this entire project. Management plans are only relevant in stable situations. Our recent and ongoing experience with Dall sheep and weather shows that's not how things work in Alaska.

I have reproduced and modified Appendix #3 (pages 26 -33) from the earlier Alaska Wildlife Conservation 'white paper.' I have updated it to relate to the Board's the present consideration of management in GMU 19C.

Respectfully,

Wayne E. Heimer, Still a Dall sheep biologist and a sheep manager of some experience during an 'earlier life.'

Appendix 3. Annotated commentary on Board of Game statutes from Alaska Statutes Title 16.

Section 16.05.221: Boards of fisheries and game

Text:

b) For purposes of the conservation and development of the game resources of the state, there is created a Board of Game composed of seven members appointed by the governor, subject to confirmation by a majority of the members of the legislature in joint session. The governor shall appoint each member on the basis of interest in public affairs, good judgment, knowledge, and ability in the field of action of the board, and with a view to providing diversity of interest and points of view in the membership. The appointed members shall be residents of the state and



shall be appointed without regard to political affiliation or geographical location of residence. The commissioner is not a member of the Board of Game, but shall be ex officio secretary.

Commentary: The Board of Game exists to 'conserve and develop' Alaska's game resources. Hence, I argue, anything beyond the "conservation and development" function specified in Alaska Statutes is beyond the authority or proper function of the Board of Game. "Conservation and development" are rather broad concepts. Subsequent Sections of Alaska Statute 16 clarify constraints on Board of Game action. That is, they establish some guidelines on what "conservation and development" may include.

It appears from Sec. 16.05.255 (discussed below) that the Board's role in conservation and development is to be accomplished through making regulations regarding 'habitat protection, opening and closing seasons, regulating methods and means, setting bag limits, classifying game, and predator management.'" These functions are defined as the "management requirements" for appropriate regulations. I suggest these "management requirements" are restrictive with respect to options of the Board of Game, and make all regulations considered by the Board subject to the strictures of constitutional policy and statutory management by the Commissioner and his employees (which constitute the Department of Fish and Game). These statutory "management requirements" cannot be understood as permissions for the Board to infringe on the prerogatives of the Department, which is staffed by trained professionals not gubernatorial appointees.

Finally, **Section 16.05.241 details "Powers excluded" from the Board of Game.** This section (discussed below) says the Boards (of Fish and Game) have regulation-making powers, but **do not have administrative, budgeting or fiscal powers.**

Commentary specific to the Dall sheep working group:

I reason the Board may legitimately establish any subcommittee or working group it thinks advisable or helpful as long as the group serves the conservation and development of Alaska's game resources, operates within the constraints of "management requirements," and requires no administrative, budgeting, or fiscal commitments.

With respect to today's Dall sheep working group, there is no serious contention that full-curl ram harvests, unhappy resident Dall sheep hunters

(historically famous for complaining about one another--and particularly guides and nonresidents) or weather-related population contractions



constitute manageable conservation threats.

Biologically, we could harvest every full curl ram in the mountains, and reproduction, recruitment, and longer-term genetic diversity would not suffer. Historically, we have harvested only about half of mature rams known to have been recruited to legal status for the last two decades (Heimer 2014). If that trend continues, there is no reason to tamper with hunting opportunity. Hence, there is no reason to alter the existing management plan. Planning is the risky responsibility of managers, not regulators.

We have inherited a check and balance system (the Board and Department) where managers can't regulate, and regulators are not supposed to manage. I suggest we honor this system.

Furthermore, I argue that if there is **no harvest-driven conservation problem** because the sheep declines in GMU 19C are weather related--as is the consensus among the professionals at ADF&G--the need to alter management plans (particularly if alteration involves more restrictions on hunting opportunity) will have to be justifiable as a means of **fostering the development** of game resources or it is also out of bounds.

It seems to me that the Board may legitimately be challenged to demonstrate why its formation of another Dall sheep working group is necessary for "conservation and development" of the Dall sheep resource of Alaska.

If, as Heimer and Want showed in their 2014 paper, hunter success has been stable since 1967 and the statistical harvest rate is light, the Board will have some difficulty explaining why it needs to involve itself as manager.

The basic question then becomes, *"Why is this working group necessary for the "conservation and development" of Dall sheep in Alaska?"*

Rationally, I suggest the other driver for alterations in GMU 19C, is the resident hunter's persistent complaint that, "We don't like nonresidents or guides!" Furthermore, I argue this is an insufficient biological or human justification for management intervention by the Board. What difference does it make to a Dall sheep population if a mature ram is killed by a resident or a nonresident...particularly when harvest rate is light?



Section 16.05.241 Powers excluded.

Text:

The boards have regulation-making powers as set out in this chapter, but do not have administrative, budgeting or fiscal powers. (Art 3 ch 206 SLA 1975)

Commentary:

From this statute I argue that because the Department is part of the Executive (administrative) branch of government, the Department, and not the Board of Game, should have the administrative powers required for making or modifying management plans. Ergo, the Board of Game is excluded from this management function.

Established traditional process infers the Board may pass regulations to implement management plans as necessary, and tradition seems to have established that the Board accepts or approves Department management plans prior to passing regulations to implement them. This is a tradition. It is not a statutory mandate. The Board appears to be limited to passing regulations (which statutes prescribes **must conform to management constraints** on the Board of Game.

The tradition of Board of Game involvement in management planning was never legislatively prescribed. It began with Board approval of the first species policies and management plans more than 40 years ago. The legislature was not involved. The policies were constructed (with some extra-constitutional constraints) by the Department and approved by the Board of Game. This process, though not statutory, has been with us so long it seems 'logical by default.' I suggest it may not be. Management plans only work when things are stable, and the weather has not been stable for Dall sheep. Perhaps more basically, the Board may not be acting within its statutory guidelines when it assumes the role of manager. That responsibility is statutorily vested in the Commissioner's Office, and implemented through the Department of Fish and Game via recommendations (proposals to) the Board of Game. The Board's drafting of its own proposals and then passing them is a recent innovation.

In spite of the long tradition of deference from the Commissioner to the Board of Game, the administrative power to make management plans does not lie with the Boards except through this extra-statutory tradition.

The Board may make regulations consistent with management constraints, but "that's it" according to Alaska statute.

Management policies and plans are not necessary if the policies of the Alaska Constitution are followed. These policies dictate management direction. If additions or changes to those policies are desirable the legislature must make them.



The Boards clearly lack not only administrative, but also budgeting or fiscal powers. This raises the pertinent question about budgeting for a management planning group.

Question: How can the Board spend money on things like the proposed working group (or the past Brinkman survey or the earlier Dall sheep working group)?

Answer: The Board can't. It will have to convince the Department to allocate funding for what the Board considered important. The most recent appropriate example remains the Board requesting a sheep status update (which cost money in staff time). The Department funded that staff time at the Board's request. The research was done, and the presentation occurred, but apparently had little influence on the Board's decision curtailing hunting opportunity in GMU 19C.

Commentary:

It appears that the Department (i.e. Commissioner) would certainly be within his administrative and fiscal authority to tell the Board, *"No, I'm not going to authorize that expenditure from Fish and Game funds."*

Similarly, the Commissioner would seem have the independent authority to tell the Board, *"Sorry, I can't authorize spending for your working group if it's purpose is to write management plans. That's my responsibility as manager, and I'll take care of it within constitutional and statutory guidelines."*

At present, there are remaining questions about expenditure of Pittman-Robertson funds associated with the working group. The proposed group seems likely (as did the previous working group upon which this one seems to be modeled) to take itself into the deliberation of specific regulatory proposals, which is apparently not allowed under the Pittman-Robertson rules.

Sec. 16.05.255. Regulations of the Board of Game: management requirements.

Text:

The Board of Game may adopt regulations as it considers advisable in accordance with the Administrative Procedure Act (AS 44.62) for

- (1) setting apart game reserve areas, refuges, and sanctuaries in the water or on the land of the state over which it has jurisdiction, subject to the approval of the legislature;
- (2) establishing open and closed seasons and areas for the taking of game;



(3) establishing the means and methods employed in the pursuit, capture and transport of game;

(4) setting quotas, bag limits, harvest levels, and sex, age, and size limitations on the taking of game;

Commentary: Presumably these limits on Board actions (management requirements) would be intended to limit the Board the “conservation and development of” Alaska’s game resources consistent with policy of Constitution Article VIII.

(5) classifying game as birds, song birds, big game animals, fur bearing animals, predators or other categories;

(6) methods, means, and harvest levels necessary to control predation and competition among game in the state;

Commentary: I infer “competition among game” refers to competition among game species, not hunters.

(7) watershed and habitat improvement, and management, conservation, protection, use, disposal propagation and stocking of game;

(8) prohibiting the live capture, possession, transport, or release of native or exotic game or their eggs;

(9) establishing the times and dates during which the issuance of game licenses, permits and registrations and the transfer of permits and registrations between registration areas and game management units or subunits is allowed;

(10) regulating sport hunting and subsistence hunting as needed for the conservation, development, and utilization of game.

Commentary: I don’t see anything here about administering or managing for the aesthetic or preferential use of groups of hunters unless necessary for conservation, development and utilization of game. That is, I see nothing here about allocating or restricting groups for other than what is necessary for conservation, and development and utilization of Dall sheep.

So, unless the case for a working group can be made as necessary for conserving, developing or using Dall sheep by restricting nonresident participation, I don’t see how the BOG can lead in any way.



The only legitimate function I can imagine for the working group would be to advise the Department to develop a common intellectual currency regarding Dall sheep and to plan appropriately within this context.

Under 16.05.255(10) the Board of Game must explain why it doesn't implement an Advisory Committee recommendation. Many Advisory Committees recommended against a Dall sheep working group to rewrite management plans. Their common basis was that they think the Advisory Committees should have a larger role than the potentially affected interests. Of course, Advisory Committees aren't in the statutory business of writing management plans either. They exist to advise the Board of local concerns about proposed regulations.

This Section also says that taking of moose, deer, elk, and caribou by residents for personal or family consumption has preference over taking by nonresidents. **Dall sheep are notably, and intentionally absent from this list because they are not a major food item. Hence, provisions for special use by residents seem to go beyond the Board's permitted statutory options where Dall sheep are concerned.**

(11) taking game to ensure public safety;

(12) regulating the activities of persons licensed to control nuisance wild birds and nuisance wild small mammals;

(13) promoting hunting and trapping and preserving the heritage of hunting and trapping in the state.

Commentary: Here, I suggest that consideration of any restriction of opportunity to hunt Dall sheep except for biologically related conservation purposes is antithetical to promoting hunting or preserving the *heritage of hunting* in Alaska.



Submitted by: Spencer Pape

Community of Residence: Wasilla

Comment:

Board of Game Members:

My name is Spencer Pape, I'm a resident of Wasilla, and have been a big game guide/outfitter (#1302) in unit 19 for 20 years. Through guiding big game hunters, outdoor recreating, and working for Brice Environmental on the remediation of the abandoned Farewell airbase, I spend roughly 70 days afield in 19C alone. I am highly concerned about the Dall sheep population in the area, as well as the state and just as concerned with the loss of another hunting opportunity.

Through boots on the ground, my observations indicate harsh winter events have been the primary cause to the decline in Dall sheep numbers and a close second would be the increase in overall numbers of predators. This year alone I found 5 dead heads at the bottom of avalanche shoots and 4 dead heads in the wide open that indicate towards predators. With the last 2 winter seasons running longer than normal, coupled with the rise in predator populations, the sheep haven't had it easy. I observed more predators this past fall than I have ever seen in my 13 years in the Farewell area. This being said, there are still sheep out there and I observed a huntable population of rams on the mountain this past season. ADF&G records show that when a particular game population is low, less hunters will go to the field for that species. This was just the case, as less than 20 residents participated in the unit 19C general season Dall sheep hunt.

While I understand the purpose of the board, and its decisions, is to put the welfare of the state's game populations first, passionate sheep hunters would rather have the board trust in the departments research and the findings of empirical evidence from full curl management and act constructively to maintain Dall sheep hunting opportunities rather than destructively by closing sheep hunting opportunities. Consider other methods for Dall sheep regulations such as the harvest of one ram every four years for both residents and nonresidents, weapons restrictions for part of the general season, shortening of the general season, and intensive predator control management within the area. The creation of a Dall sheep working group to brainstorm such methods and means to come up with the best path forward to Dall sheep conservation would be extremely beneficial to the resource. Previous species-specific working groups, such as the Koyukuk River Moose Hunters' Working Group, have been instrumental in the rehabilitation of moose, the conservation of moose and maintaining the hunting opportunity for moose. With the forementioned, I'm keen to participate amicably on and or with the working group.

Good day and thank you for your time and dedication to this board.

Respectfully,

Spencer Pape



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

October 31, 2023

To: Alaska Board of Game – Unit 19C Sheep Working Group committee

Re: Formation of Unit 19C Sheep Working Group

Dear Chair Hoffman and members of the Unit 19 Sheep Working Group (SWG) committee,

We again request that a representative from Resident Hunters of Alaska (RHAK) be included as a member of the Unit 19C Sheep Working Group. Several thousand RHAK members want to have a voice on what is best for our Dall sheep and the future of our sheep hunting opportunities.

As you know, Resident Hunters of Alaska (RHAK) has been heavily involved in Unit 19C sheep issues, submitting proposals each cycle that sought to better conserve the sheep population by limiting nonresident sheep hunters so that resident sheep hunting opportunities were not restricted.

Regarding the Draft Charge Statement for this SWG committee prepared by Chairman Burnett (copied below on page 2), one thing that came out in prior board meetings on this SWG from one of the members on the committee was not to rush this, and not to expect results and/or recommendations ahead of the 2024 Region III meeting.

We recommend that the Draft Charge Statement reflect that should this SWG be formed, and members chosen, the group will not be expected or required to develop any policy or regulatory proposals ahead of the Region III meeting in March, 2024.

Sincerely,

Mark Richards
Executive Director Resident Hunters of Alaska



Draft Charge Statement for the Board of Game Unit 19C Sheep Committee

The sheep hunting season in GMU 19C has for many years been open to resident and nonresident hunters on a harvest ticket system which has allowed any hunter the opportunity to harvest one full curl ram each year. Non-resident hunters are required to contract with a licensed guide before hunting sheep. Much of GMU is state land, there are currently no restrictions on the number of guides who can operate on this state land.

Over the past several years, populations of Dall Sheep have fallen dramatically statewide. Population declines are primarily attributed to environmental factors, mostly winter weather **events. The Department of Fish and Game believes that the "Full Curl" management strategy prevents overharvest and does not attribute sheep declines to hunting.**

In 2022, the total harvest of Dall Sheep in GMU 19C was 30, with 27 taken by guided nonresidents and 3 taken by Alaska resident hunters. The total numbers and the proportions of sheep taken by non-residents and resident hunters has changed dramatically over the past several years. In March 2023, the Board of Game voted to close GMU 19C to non-resident sheep hunters. While the Board chose to close non-resident hunting in GMU 19C, this is not considered by many as a viable long-term solution.

The Board of Game is charged with allocating game resources between beneficial uses for the maximum benefit of the people of Alaska. Dall Sheep have a high value to residents for **consumption as well as trophy hunting, and as one of the two major "must be guided" game species** they provide a large portion of the \$100 million revenue to the guiding industry. In addition, the sales of licenses and tags to non-residents provide significant portion of the funding for game management statewide.

The Committee is charged with bringing together a group consisting of members of the Committee, representatives of the Department of Fish and Game, landowners (potentially DNR), advisory committee representatives, resident hunters, and representatives of the **guiding industry to develop a "Management Plan" for Dall Sheep in GMU 19. This plan** should ensure that the BOG and ADF&G have appropriate tools to maintain access for all user groups to hunting opportunities for sheep in GMU 19C. The plan should be flexible enough to maintain user opportunity and maximum benefit over a wide range of sheep populations. The group is expected to develop regulatory and/or policy proposals and report to the BOG at its meeting in March 2024. The group may also consider whether there is a need for specific legislation to implement the plan.

While the group will be chaired by a member of the BOG, it is expected that a professional facilitator be hired to help bring the diverse interests together and ensure that the group bring forth a viable product.

Prepared by Committee member, Jerry Burnett



PC07

Submitted by: Andrew Runkle

Community of Residence: McGrath, Alaska

Comment:

Hello I'm Andrew Runkle a life long Alaskan who has lived in 19C and 19D for 38 years. I grew up hunting/Guiding and trapping in 19C with my family. I been a Class A Guide since 2002 and have been going on sheep hunts with my father and grandfather in 19C since 1989. I was also the first individual to harvest a dall sheep In 19C for the Winter Sheep hunt. I have and still spend a lot of my time in the mountains around Dall sheep while hunting guiding and trapping every year. I've witnessed the Dall Sheep population rise and fall over the years. I currently serve on the local fish n game committee I currently sit on the Nikolai seat but I reside in McGrath with my family. I would like to serve on the 19C Dall Sheep Committee the preservation of our Sheep in 19C Is very important to me and my family and I would love to be a part of it thanks for your time.



PC08

Submitted by: Craig Van Arsdale

Community of Residence: Soldotna, AK

Comment:

I would like to see this committee focus on how we can avoid an all out closure as that type of action is against Full Curl Management and the position of the Sheep biologists within the Department.

I would support the continued General Season Harvest Ticket structure as an Archery Only weapon restriction on Full Curl rams as a solution to greatly reduce harvest but maintain hunter opportunity.

Archery hunting success averages sub 10% on archery only ANY RAM tags in the Chugach whereas any weapon hunting is 25% or more.

Archery Only weapon restrictions would allow hunters to continue to hunt sheep but with a much lower impact to Full Curl ram harvest while the population rebounds.

Its important to all user groups that we follow the scientific data without political bias while still finding a way to allow continued General Season sheep Hunting with a priority towards Residents. While I am glad resident hunting was not closed as a result of the proposal I think we need to find a way to limit but re open Non Resident sheep hunting in 19C, preferably through weapon restrictions.



Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: 907-786-3888 Fax: 1-907-786-3898
Toll Free: 1-800-478-1456

In reply refer to:
OSM 23131

NOV 8 2023

Jerry Burnett, Chairman
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Board of Game Chairman Burnett,

I write to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council), who wishes to express their interest to represent federally qualified subsistence users of the Western Interior region on the Board of Game's (BOG) Unit 19C Sheep Working Group (Working Group).

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior Region. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to subsistence uses of fish and wildlife within the region, and members of this Council are also rural subsistence users who utilize sheep.

Over the past decade, the Council has become increasingly concerned over the population decline of sheep in the Western Interior Region, including in Unit 19C. These animals are relied upon for subsistence needs, and the Council wishes to assist in addressing this decline so that subsistence users can continue to rely on this species for consumptive uses. The Council would like to be involved in a proactive role in ensuring the sheep population rebounds as quickly as possible. At their Fall 2023 meeting, the Council nominated its Chairman Jack Reakoff to represent the Council on the Unit 19C Sheep Working Group if the Council is selected for a seat.

To demonstrate the Council's concern on this topic, the Council has submitted an Agenda Change Request to the BOG this cycle requesting the elimination of horn growth annuli from the definition of a full curl-horn as it is very difficult to count annuli correctly in the field while at a



distance. The anticipated result of adopting this regulation would be a reduction in incidental take of sub-legal rams. With the current level of sheep populations and the continued threat of adverse winter and spring weather events, every sheep left on the range will help towards their recovery.

In addition to requesting a Council seat on the Unit 19C Sheep Working Group, the Council wishes to endorse a seat reserved for a McGrath Fish and Game Advisory Committee (AC) member. It is our understanding that the McGrath AC will not have an opportunity to meet until after the comment deadline for the Unit 19C Sheep Working Group membership. The Council wants to highlight that McGrath AC members are an important voice for the people of Unit 19.

The Council is hopeful that selected members of the Working Group will be able to work together towards cohesive solutions and that a targeted spatial approach will result in faster recovery of sheep in Unit 19C.

The Council would like to thank the BOG in advance for your consideration. Any questions or comments regarding this matter can be addressed to me through the Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_batespilcher@fws.gov.

Sincerely,

Jack L. Reakoff
Chair

cc: Office of Subsistence Management
Western Interior Alaska Subsistence Regional Advisory Council
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record