

ALASKA BOARD OF GAME
Central/Southwest Region Meeting
Wasilla, Alaska
February 13-20, 2015
On Time Public Comment Index

William Robinson.....	PC001
Wrangell-St. Elias National Park Subsistence Resource Commission.....	PC002
National Park Service	PC003
Donald Lee.....	PC004
Brian West	PC005
Robert Godwin.....	PC006
Barbara Carlson	PC007
Jason Mogen	PC008
Roger Pearson	PC009
Eric Nordstrom.....	PC010
Mike Vanstrom	PC011
Luke Graham	PC012
Tyler Freel.....	PC013
Annette Burroughs	PC014
Lance Raymore	PC015
USF&WS, Office of Subsistence Management.....	PC016
The Wildlife Society, Alaska Chapter	PC017
Todd Fritze.....	PC018
Karen Gordon.....	PC019
Robert Cassell	PC020
Ed Soto.....	PC021
Scott Peterson.....	PC022
Wild Sheep Foundation.....	PC023

ALASKA BOARD OF GAME
Central/Southwest Region Meeting
Wasilla, Alaska
February 13-20, 2015
On Time Public Comment Index

Cleve Cowles	PC024
Israel Payton.....	PC025
Seth Skogstad.....	PC026
Richard Fuelling.....	PC027
Territorial Sportsmen Inc	PC028
William Rice & Ann Williams	PC029
Ahtna, Inc., Customary & Traditional Use Committee	PC030
Alaska Trappers Association	PC031
Roger Denny	PC032
Gary McCarthy	PC033
Brian Bagley	PC034
Mike McCrary.....	PC035
Michael Strahan	PC036
Jerry Hupp.....	PC037
Loren Karro.....	PC038
Wayne Heimer	PC039
Jane Grant	PC040
Kathleen Cheatham.....	PC041
Mary Ann Sturdevant.....	PC042
Thomas Rothe	PC043
Mark Hamm	PC044
Nick & Karen Steen	PC045
Alaskan Bowhunters Association	PC046


ALASKA BOARD OF GAME
Central/Southwest Region Meeting
Wasilla, Alaska
February 13-20, 2015
On Time Public Comment Index

Ray Atkins	PC047
USF&WS, Togiak National Wildlife Refuge	PC048
Bristol Bay Native Association.....	PC049
Matt Tobin	PC050
Prince William Sound Charter Boat Association.....	PC051
Shawn Phillips	PC052
Larry Gilman.....	PC053
Stephen Springer, Jr	PC054
Henry Tiffany.....	PC055
Dennis Smith.....	PC056
Scott Luber, Proving Trail Adventures	PC057
David Pinquoch.....	PC058
Matt Cline	PC059
Heidi Cline	PC060
James A. Blake.....	PC061
Stephen Stidham	PC062
Scott Yeats	PC063
Aaron Bloomquist.....	PC064
David Winney	PC065
Isaac Rowland.....	PC066
Wayne Kubat	PC067
Dan Montgomery	PC068
Karen Gordon.....	PC069

ALASKA BOARD OF GAME
Central/Southwest Region Meeting
Wasilla, Alaska
February 13-20, 2015

On Time Public Comment Index

Luke Boles	PC070
Becky Schwanke.....	PC071
Barbara Johnson.....	PC072
Backcountry Hunters and Anglers, Alaska Chapter	PC073

ALASKA BOARD  PC001
1300 COLLEGE RD. 1 of 2
FAIRBANKS, AK 99701
DECEMBER 5, 2014

TO WHOM IT MAY CONCERN
DEAR SIR OR MADAM,
RE: PROPOSAL #138

I AM A 21 YEAR VETERAN OF HUNTING THE SAWTOOTH MOUNTAINS FOR MOOSE. IN THE PAST FEW YEARS OUR HUNTING PARTY HAVE WITNESSED THE RAPID DECLINE OF MOOSE.

IN YEARS PAST WE HAD TRACKS IN THE TRAILS, BROWSED BUSHES, AND PACKED DOWN TRAILS IN CREEK CROSSINGS. WE USED TO SEE BULLS WITH 7 TO 9 COWS. NOW WE FORTUNATE TO SEE A BULL WITH SO MUCH AS A SINGLE COW. WE HAVE NOT SEEN A SINGLE CALF IN THREE YEARS. SEVEN YEARS AGO WE COMPLAINED ABOUT THE INCREASING WOLF PACKS, WE WERE GIVEN COW HUNTS. A PLACE WHERE WE USED TO SEE COWS AND CALVES DAILY, WE ARE FORTUNATE TO SEE A SINGLE ANIMAL IN A WEEK. THIS AREA HAS BEEN MISMANAGED TO THE POINT OF DEVASTATION.

I AM 60 YEARS OLD AND DO NOT SEE HOW THIS AREA CAN RECOVER IN MY HUNTING LIFE TO WHAT IT WAS TEN YEARS AGO. I LIVE ON CHENA HOT SPRINGS ROAD, A PLACE WHERE MOOSE WAS ABUNDANT AND HAVE SEEN THIS SAME PRACTICE OF COW HUNTS KILL THE HUNTING THERE, TOO.



STOP THE COW HUNTS.

SINCERELY, 

WILLIAM ROBINSON
P.O. Box 82917
FAIRBANKS, AK 99708
907-488-7554



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 8, 2014

Ted Spraker, Chairman
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99802-5526

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center on October 7 and 8, 2014. The SRC represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve, including many residents of Copper Basin communities. At this meeting, commission members discussed the Copper Basin Community Subsistence Harvest (CSH) and in particular how participation in the Copper Basin Moose CSH Hunt impacts residents of communities in our area. The Nabesna Road and the lands accessed off of it are a popular hunting area for our local communities. Although the road crosses the Unit 11-Unit 12 boundary, for us it is essentially single hunting area. Indeed, the Federal Subsistence Board and the Alaska Board of Game both recently created a joint state/federal permit (RM291) that allows hunters to hunt this area using a single permit.

It recently came to our attention that people participating in the Copper Basin CSH moose hunt (CM300) are not allowed to hunt in the Unit 12 portion of the Nabesna Road as a condition of their CSH permit. Consequently they can obtain an RM291 permit, but must turn around when they reach the Unit 12 boundary along the road. This is of considerable concern to the commission, and we believe an unnecessary restriction. As a solution to this problem, we recommend adding to the Copper Basin CSH permit hunt area that portion of Unit 12 within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge.

Thank you for considering our recommendation.

Sincerely,


Karen Linnell
Chair

Cc: Superintendent, Wrangell-St. Elias National Park and Preserve
Governor of Alaska

Chair: Karen Linnell; Members: , Bert Adams, Sr., Dan Stevens, Don Horrell, Don Welty, Gloria Stickwan, Robert Fithian, Sue Entsminger, Suzanne McCarthy



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

7.A.2. (AKRO-RNR)

DEC 11 2014

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

A number of proposals before the Board of Game (BOG) for the February 13-20, 2015, meeting in Wasilla may affect or have the potential to affect National Park System areas in the Alaska. We appreciate your consideration of our comments.

As you know, the National Park Service (NPS) mission and mandates differ from the State of Alaska and other federal agencies based on our respective legislation and authorities. The vast majority of Board decisions are in alignment with NPS management objectives. A handful, however, conflict with the NPS management laws and policy. Many of the proposals made during this session do not affect the management interests of the NPS, and we therefore have no comments on those proposals.

Specific comments for the February BOG session are attached.

Sincerely,

Debora Cooper
Associate Regional Director, Resources

cc:

Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director, NPS
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, FWS
Rick Obernesser, Superintendent, Wrangell-St. Elias
Don Striker, Superintendent, Denali
Greg Dudgeon, Superintendent, Gates of the Arctic and Yukon-Charley Rivers
Diane Chung, Superintendent, Katmai, Aniakchak, and Alagnak
Margaret Goodro, Superintendent, Lake Clark
Bud Rice, Management Biologist, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



Proposal 44: Recommendation: Oppose

(Moose: GMU 9B) This proposal would eliminate the antlered requirement for take of a bull moose during the winter season December 15 – January 15. This proposal has the potential to affect moose populations in Lake Clark National Park and Preserve. If the proposal passes it may be difficult for hunters to tell the difference from bulls and females because most likely the antlers will have fallen off of bulls. Losing females in the reproductive ages would not help maintain or increase the moose population, which is reportedly declining or low and stable.

Proposal 45: Recommendation: Oppose

(Brown bear: GMU 9B) This proposal would increase the resident bag limit for brown bear in Unit 9B from one bear every four years to one bear every year with seasons open in spring and fall. This proposal has the potential to affect brown bear populations in Lake Clark National Park and Preserve. This proposal is not needed to protect village areas because the State already has a permit hunt for area residents (RB525) to take one bear every regulatory year near villages in Unit 9 with no closed season. Also, RB502 provides opportunities for Alaska resident subsistence hunters to take one bear in Unit 9B every year between September 1 and May 31 with a permit issued from King Salmon. Opening the seasons in both spring and fall every year for all Alaska residents has the potential to put excessive pressure on a population with relatively low reproductive capability.

Proposal 54: Recommendation: Oppose

(Brown Bear: GMU 17) This proposal would allow resident hunters to sell the hides with claws and/or skulls of lawfully taken brown bears. The purpose is to provide an economic incentive to harvest more brown bears to reduce predation on moose and caribou and reduce bear hazards around area communities. Efforts to drive down native predator populations are inconsistent with NPS mandates to manage for naturally functioning ecosystems.

Bag limits are currently liberal at two bears every regulatory year between August 20 and May 31. Tags are not required for Alaska resident subsistence hunts under registration hunt RB500. In addition, this proposal is inconsistent with the ADF&G requirement that the skin of the head and the front claws are removed and kept by ADFG under the subsistence hunt.

Proposal 58: Recommendation: Support

(Wolves: GMU13) This proposal advocates for less pressure on the wolf population; which could affect the health of the ecosystem within the Wrangell-Saint Elias National Park & Preserve. The NPS supports the Advisory Committee's conclusions that a certain number of predators are necessary for the health of the ecosystem. The NPS also agrees that increasing coyote and raven numbers, as well as the recent drop in moose twinning rates, could be indicators that something is amiss or has changed the balance of a functioning predator/prey dynamic.



Proposal 93: Recommendation: Oppose

(Brown bear: GMUs 11 & 13) This proposal would allow the take of brown bear at black bear bait stations in Units 11 & 13. This proposal would overlap areas of Wrangell-Saint Elias National Park and Preserve and be adjacent to parts of Denali National Park and Preserve. This harvest method has been temporarily restricted on NPS lands pending a proposal to modify federal regulation. The NPS is opposed to food-conditioning of bears. If this proposal passes, then the NPS requests that the BOG exclude National Park System areas.

Proposal 94: Recommendation: Oppose

(Brown bear: GMU 13D) This proposal would open a fall season for take of brown and black bears at black bear bait stations in Units 13D between August 25 and October 15. This proposal is adjacent to a large area of Wrangell-Saint Elias National Park and Preserve. This proposal could result in food conditioning of bears entering the park and preserve. The taking of brown bears over bait stations has been temporarily restricted on NPS lands pending a proposal to modify federal regulation. The NPS is opposed to food-conditioning of these bears.

Proposal 101: Recommendation: Oppose

(Review and modify the predation control plan for wolves and bears: GMU 16) This proposal would replace the Unit 16 Intensive Management Plan at 5 AAC 92.122 and authorize the use of public aerial shooting or land and shoot permits as a method of wolf removal. It may also authorize the take of black bear sows with cubs and brown bears with no bag limit and same day airborne taking of black bears from either a fixed-wing airplane or helicopter. Foot snares may be used to take black bears. Brown bears may be taken incidentally. Brown bear cubs of the year or sows with cubs are to be reported to ADF&G.

This proposal avoids these activities over the boundary of Denali National Park, but fails to specifically omit the Denali National Preserve area in its description. The proposal is likely to affect predator populations within Denali National Park and Preserve and/or Lake Clark National Park.

Same-day use of airplanes in support of big game harvest is prohibited in Alaska National Park System areas pursuant to 36 CFR 13.40(d)(4), and the use of helicopters in support of big game harvest or any recreational pursuit is prohibited in National Park System areas.

Efforts to drive down native predator populations are inconsistent with NPS mandates to manage for naturally functioning ecosystems. The NPS requests the BOG clearly disallow these activities within all areas of the National Park System, including national preserves.

Proposal 102: Recommendation: Oppose

(Black and brown bears: GMU 16) This proposal would establish a fall season for hunting black and brown bear over bait by residents and nonresidents in all of Unit 16 except Denali State Park, August 25-October 15. Unit 16 overlaps parts of Denali National Park and Preserve and Lake Clark National Park and Preserve. Existing annual compendia rules prohibit the taking of brown bear over bait. Bait station hunting opportunities in the fall while other hunters accessing remote areas to hunt other species could create even greater safety concerns with unintended bear-human interactions. In addition, the NPS is opposed to food-conditioning of these bears in park areas. If this proposal is



adopted, the NPS requests the BOG clearly disallow these activities within all areas of the National Park System, including national preserves.

Proposal 113 & 120: Recommendation: Oppose

(Dall Sheep: Interior & Central /Southwest GMUs) These proposals would open an August 1-9 bow hunting season in the Interior and Central/Southwest Regions, which include GMUs 9A, 9B, 11-17, 19-20, 24 and 25. These proposals would overlap areas in Denali National Park and Preserve, Gates of the Arctic National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-Saint Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. These proposals would overlap an elder sheep season in Wrangell-Saint Elias National Park and Preserve.

Estimates from surveys conducted by the NPS and ADFG in 2014 indicate a 70-80% decline in sheep numbers in the western Brooks Range since 2011 and very low lamb productivity, which has prompted emergency closures of state hunts in GMUs 23 and 26A and federal hunts in 23 and 26A west. Additionally, a survey conducted by NPS, BLM and FWS in 2014 in northeastern Gates of the Arctic indicated a 62% decline in total sheep numbers since 2012 and low lamb productivity for the second year in a row.

The NPS is currently working with Subsistence Resource Commissions, Federal Subsistence Regional Advisory Committees, the Federal Subsistence Board, other agencies, and local communities to address current federal regulations for Gates of the Arctic National Park and Preserve in light of the large decline.

The NPS does not support extending seasons or otherwise increasing hunting pressure on sheep given that current populations throughout much of the State are declining and do not appear stable.

Proposal 115: Recommendation: Support with Modification

(Dall Sheep: GMU 20 remainder) This proposal would create a youth Dall sheep hunt in Unit 20 remainder by drawing from July 20 to August 5. Youth hunters must have successfully completed an Alaska Department of Fish and Game approved Hunter Education Course and must be accompanied by a licensed resident adult that is 21 years of age or older. Proxy hunting would not be allowed. This could affect sheep populations in Yukon-Charley Rivers National Preserve.

Other youth hunts require the accompanying adult to forfeit their tag if the youth is successful, but this proposal does not require that. Also, this proposal allows for any sheep to be taken, which could be detrimental to the small sheep population in the preserve. The NPS requests that this proposal is modified to require the accompanying adult to forfeit their tag if the youth is successful and that only legal rams are taken when populations are low.

Proposal 118: Recommendation: Oppose

(Dall Sheep: GMUs 9, 11, 13, 14, and 16) This proposal would begin resident sheep hunting seven days earlier than nonresidents in Units 9, 11, 13, 14, and 16. The resident hunting season for Dall sheep would be August 3 to September 20, and the nonresident season would be August 10 to September 20. This proposal has the potential to affect sheep populations in Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-Saint Elias National Park and Preserve.



Current sheep harvest levels are at or exceeding maximum allowable levels for many of these areas and populations are declining. Decisions about season extensions should be made on a unit by unit basis to ensure conservation of specific populations, rather than applied broadly throughout the region.

Proposal 119: Recommendation: Oppose

(Dall Sheep: Central/Southwest Region - GMUs 9, 11 – 17, and 19) This proposal is similar to proposal 118. It would begin resident sheep hunting seven days earlier than nonresidents in the Central/Southwest region. The resident hunting season for Dall sheep would be August 3 to September 20, and the nonresident season would be August 10 to September 20. This proposal has the potential to affect sheep populations in Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-Saint Elias National Park and Preserve. Decisions about season extensions should be made on a unit by unit basis to ensure conservation of specific populations, rather than applied broadly throughout the region.

Proposals 121 to 123: Recommendation: Oppose

(Sheep: Interior Region GMUs 12, 19, 20, 24, & 25) These proposals would lengthen the season dates for Dall sheep for resident hunters and retain the non-resident season. This proposal would overlap areas in Denali National Park and Preserve, Gates of the Arctic National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-Saint Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve.

Estimates from surveys conducted by the NPS and ADFG in 2014 indicate a 70-80% decline in sheep numbers in the western Brooks Range since 2011 and very low lamb productivity, which prompted emergency closures of state hunts in GMUs 23 and 26A and federal hunts in 23 and 26A west. Additionally a survey conducted by NPS, BLM and FWS in 2014 in northeastern Gates of the Arctic indicated a 62% decline in total sheep numbers since 2012 and low lamb productivity for the second year in a row. Should any of these proposals pass, we request NPS Preserve lands be excluded.

Decisions about season extensions should be made on a unit by unit basis, to ensure conservation of specific populations, rather than applied broadly throughout the region. The NPS does not support extending seasons or otherwise increasing hunting pressure on sheep given that current populations throughout much of the State are declining and do not appear stable.



Proposal 125: Recommendation: Oppose

(Moose: GMUs 11, 13, 14A, 16, and 17) This proposal would open a seven-day moose season for IBEP-certified bow hunters following the general season hunts in Units 11, 13, 14A, 14B, 16, and 17. This proposal has the potential to affect moose populations in Denali National Park and Preserve, Lake Clark National Park and Preserve, and Wrangell-Saint Elias National Park Preserve.

It is unclear whether this proposal would apply only in places that require a harvest ticket or anywhere that a drawing permit is not required. It is also unclear how this would be handled if a registration permit were to be required. A unit-by-unit evaluation is needed to determine if area moose populations could withstand additional harvest pressure from the extended season.

Proposal 127 & 128: Recommendation: Oppose

(Brown bear: Central/Southwest Region). This proposal would remove the meat salvage requirements for brown bear taken over bait in the Central/Southwest Region and could affect brown bear populations in or near the Alagnak Wild River, Aniakchak National Monument and Preserve, Denali National Park and Preserve, Katmai National Preserve, Lake Clark National Park and Preserve, and Wrangell-Saint Elias National Park and Preserve.

The NPS is opposed to wanton waste and to food-conditioning bears. The taking of brown bears over bait stations has been temporarily restricted on NPS lands pending a proposal to modify federal regulation. Efforts to drive down native predator populations are inconsistent with NPS mandates to manage for naturally functioning ecosystems. If this proposal is adopted, the NPS requests the BOG clearly disallow these activities within all areas of the National Park System, including national preserves.

Proposal 129: Recommendation: Oppose

(Brown bear: Central/Southwest Region). This proposal would remove the requirement to clean up contaminated soil from bear bait stations in the Central/Southwest Region. This proposal could affect bear populations and their behaviors in or near Alagnak Wild River, Aniakchak National Monument and Preserve, Denali National Park and Preserve, Katmai National Preserve, Lake Clark National Park and Preserve, and Wrangell-Saint Elias National Park and Preserve.

The NPS supports the current law requiring thorough clean-up of bear bait stations to eliminate continued attraction of bears to those sites, remove any visual or olfactory offense, and reduce any potential for public safety reasons. The NPS is opposed to food-conditioning bears. Food contaminated soil can condition bears to human foods and lead to bear-human conflicts.

Proposal 133: Recommendation: Oppose

(Exceptions to Taking of Game: Central/Southwest Region). This proposal would remove the restriction against using felt sole waders while hunting in Central/Southwest Region Units. This proposal could result in adverse effects to fishery resources in all National Park System areas in the Central/Southwest Region. As has been documented elsewhere, relaxing the prohibition on use of felt-soled waders can result in the introduction of debilitating fish diseases and invasive species.



To: the Board of Game regarding changes to sheep hunting regulations.

From: Donald Lee III. (907)347-6975

20+ years experience sheep hunting on foot in 5 distinct areas of the state
Former member and writing contributor to the Alaska chapter of the FNAWS.

Thankyou for taking these comments/ideas into consideration. I filled out Todd Brinkmans survey, attended the presentation of those results and have been to several recent AC meetings both in Tok and Fairbanks. I am a little concerned with proposed changes to regulations that I see coming out of some of these meetings. There are also some good ideas but I want to remind the board that the survey results spoke to hunters' desire for the opportunity to hunt sheep. "Opportunity to hunt sheep every year" ranked very high on the survey. Lets be careful, as we consider changes to the regulations, to do what we can to preserve both opportunity and resource. I would also like to encourage the board to only cater to opinion and perceptions when it is not at the expense of the resource....no matter how crowded hunters may feel the field to be. For example it's clear that hunters who answered the survey may not have the facts straight when it comes to crowding. Page 4 of the responses shows that hunters felt crowding was an issue due to among other things, more nonresident hunters, more professional transporters, more resident hunters, and more Alaska residents with planes. I would hazard a guess that at least in these four areas. these are simply perceptions and not the reality. When it comes right down to it...this is about the sheep. Sheep, I feel (and the surveyed public felt) to be declining/in trouble. We know for a fact that weather in Alaska is changing (warmer...more rain and ice on the mountains during the winter, receding glaciers etc) and I think this among other things is severely affecting sheep. Yet most of the resources and funds available to ADFG are spent/used for moose and caribou. If sheep are the resource in trouble...then the funding structure needs to change. It is my sincere hope that there will increasingly be monies available for getting a good data set with regularity so that ADFG and the public *know* what is actually going on with sheep. Too often it is heard and said, "Well....we don't really have that information," when questions about the health of Alaskas sheep are concerned. Lets preserve the resource....otherwise hunting sheep and crowding and airplanes spotting sheep during the season....will not matter a hoot! With that being said here is my list of ideas based on what I have heard, observed, and participated in.

FUNDING:

I realize that some of the funding issues are legislative issues and not necessarily BOG issues. However, as the BOG, you have the power to submit proposals to the legislators of our state. I would encourage you to be persistent with this regardless of your success or lack thereof in the past.

- 1) Do away with 5A licenses or somehow find a way to monitor residency so that the level of abuse when it comes to these licenses is decreased.
- 2) Institute a resident tag fee for sheep and grizzly statewide. Tag fees were broadly supported in the Sheep Hunter Survey. Another twist on this however might be to only have *successful resident* hunters pay the tag fee. I mention this, because despite being an avid sheep hunter and spending considerable time and effort doing so, I have taken 5 sheep in my twenty years of hunting them. I have hiked sheep out of the mountains for close to 40 miles on solo hunts so I know what it means to work for a sheep. And yet I have taken approximately one sheep every 4 years. If tag fees were as high as \$100 (as some have suggested should be the case), I wouldn't be too thrilled with having paid \$2000 for the privilege of taking 5 sheep. I also mention tag fees with reservation because I already worry about sheep hunting becoming a rich mans game (look at other states as a ready example). I think however that a tag fee should be instituted. I think it should either be based on success or should be fairly modest and in the range of 20-50\$.



I DO NOT feel that *license* fees should go up. What if, for instance I just want to do a little duck hunting each fall. However, tag fees, reflective of what is being hunted, should be instituted.

- 3) Allow hunters to apply for more than 3 drawing hunts. This would certainly help raise funds. If I could apply for 6 or 10 sheep hunts I would! I dare say most sheep hunters would.
- 4) Realign some priorities to funnel more funds to sheep research. For instance consider discontinuing the expense of aerial wolf and bear control. You could probably place large bounties on both and still save money. Put a \$1000 bounty on wolves and you'll have people out there working at getting them. I have a good paying job and I'd take the winter off to trap wolves if there was that kind of bounty! Fuel for helicopters is not cheap. Maybe the price of this aerial gunning should be publicized.....
- 5) Increase fees that guides must pay to the state

CROWDING and NONRESIDENTS:

I would caution that care be taken with the survey results in this case. As was mentioned in the meeting, every sheep hunter thinks that he should be the only one on a mountain covered with full curl rams. Many people these days, including hunters, have become increasingly soft and don't have the nerve or backbone to really work for a sheep. How do we know whether or not that fact is some of what is being seen in the "crowding" results of the survey. If the majority of hunters just want to cruise on their fourwheeler off the highway to some place where they might be able to take a sheep in a day or two and where everyone else did the same...they *should* expect crowding.

- 1) There was an idea looked at by the Tok AC that I thought was an excellent idea although I have put my own twist on it here. Hunters in the survey were not really in favor of more drawing hunts yet I see a lot of ideas for more drawings coming out of the ACs because of the desire to reduce crowding. So...here's an alternative. Lets divide the general season down the middle or close to it. For instance maybe the second portion of the season can be slightly longer due to potential weather issues. So...divide the general season statewide with perhaps the Brooks range being the exception. Say Aug 10-25 and Aug 26-Sept 20. Then allow hunters with last names starting with A-M to hunt the first portion of the general season on even-numbered years while hunters with last names N-Z hunting the second portion of the general season on that even numbered year. The following year it would be reversed and so on. That way when I come in for a tag, ADFG would simply need to look at my name and then issue me the season-appropriate tag. Such a system would not require a new computer program to keep track of. This system would also reduce crowding immediately, would not just displace the crowding to a different portion of the season (which is a drawback of many of the proposals I've seen), and would not reduce opportunity. The only drawback I can come up with in this scenario might be that someone with a last name starting with 'L' might want to hunt with someone with a last name starting with 'R' for instance. I have not come up with a good idea on how to deal with that, nor have I decided it needs to be dealt with. Concessions are going to have to be made if we all wish to keep hunting sheep.
- 2) All nonresidents should have to apply for sheep tags. Institute a statewide drawing for nonresidents. Is there *any* other state where nonresidents can get sheep tags over the counter? For that matter is there any other state where *residents* can get sheep tags over the counter? We don't want to become like other states!
- 3) Decrease (slightly) nonresident allotment of tags for all drawing hunts.
- 4) Cap the numbers of allowable guides in this state and mandate that they be residents of the state in order to guide here! And only allow them to claim/use/guide in certain portions of the state. They should not be allowed to guide wherever they want to. There definitely has to be



something done about guides right along with airplanes. I will say I have been pleased that guides have been involved in this process and for the most part seem to be contributing and suggesting things that the average foot hunter would agree with. I applaud them for that but still think their numbers and access should be restricted. Sheep need to be available to people who cannot pay 15-20 grand for the privilege.

AIRPLANES:

Something definitely must be done about the use of airplanes! Supercubs can increasingly land almost anywhere and the really big sheep in many units are well known to anyone who has access to a plane or who may guide in the area. I drew a TMA tag for instance several years ago. I was told by a flying friend exactly where a big ram had been hanging out and then was told that a guide in the area knew exactly where the ram was too and would likely be all over it opening day. Indeed this was the case. I think it turned out to be a 43inch ram. Probably a non-resident took the ram as most of the people who hire a guide to hunt the TMA are nonresidents. As a resident who hunts on foot....this was super exasperating. It made me feel like I never really had the chance to take a trophy ram because I do not have the funds to hire a guide, or scout from the air. I think some of the sentiment against airplanes is also an expression of frustration that sheep hunting (or at least successful sheep hunting) is increasingly becoming a rich mans game.

- 1) Prohibit hunting after having flown in an airplane until at least 12 noon following the day one has flown in an airplane. Even better would 24hrs (midnight) following the day one has flown in an airplane and a 24hr regulation actually had more support than a 12hr rule in the survey.
- 2) Absolutely prohibit spotting/surveying sheep from an airplane during the season and even better would be to prevent such from occurring for up to a week prior to season. Give the sheep a fighting chance! For instance in the TMA...perhaps there should just be no flying allowed for the week directly prior to opening day. If a guide is seen flying in the TMA during that week...he should be cited. Something like this is very black and white and enforceable and is what needs to occur. You can't mandate flying elevations (like the park has) etc because how are you going to enforce it? It would be a regulation without teeth. Circling sheep would also be hard to enforce. Maybe the pilot would tell you he was just trying to gain elevation. Think carefully about what to do with airplanes but do something and make it enforceable.
- 3) Increase fines for hunters who are complicit to crimes like spotting sheep during the season (if that becomes law) If I'm flying in with a guide for instance and he circles some sheep on our way in...I should as an ethical hunter, report him or expect to suffer the consequences myself. Correspondingly increase teaching of hunters with regard to the laws and consequences of being complicit to a crime. Maybe nonresidents should be required to watch a quick instructional video at ADFG before embarking on their hunt.

SEASONS:

- 1) Do not make the season start any earlier. Heat and getting sheep meat out of the field is already an issue and making the season earlier would exacerbate this problem. It was 70-80 degrees during my hunt last year and I had a hell of a time getting my sheep out fast enough to keep the meat in good shape. I did it but would not have wanted to be out there one single day longer. It was a verified 90 degrees for two days of my hunt the year before that! 90 degrees!
- 2) Consideration could be given to delaying the opening date for nonresident hunters (for instance 5 days into the season) so that only resident hunters get the first real opportunity to harvest a sheep

NON-MOTORIZED in relation to GUIDES:



- 1) Please make more of the non-motorized areas off limits to guides. Tonsina and Glacier Mountain for instance should be off limits to all guides! Non-motorized hunts really cater to people who don't have the resources to fly an area before season, or pack in with horses etc etc. Non-motorized should be synonymous with resident, non-guided hunter, walk-in opportunity only.
- 2) I also feel that more non-motorized areas should be created. Especially in areas surrounded by roads/highways. I personally feel that at least a portion of the TMA should become non-motorized similar to the DMA including off limits to airplanes. And the nonmotorized portion should include some areas that are known to hold big rams.

FULL CURL vs ??

Finally...lets get smart here! Why have we not gone to an “any ram” or even an “any sheep” regulation for most if not all drawing hunts? Lets protect some genetics! Granted a few more sheep would be killed but it would be in a more balanced manner than only allowing full curl rams to be killed. It would also be in areas where managers have full control over how many sheep are killed during the season. Drawing areas only. You have only to look at the record books to see that, in general, the size and availability of big rams is decreasing. And lets face it...despite how delicious everyone tells you sheep meat is, sheep are not targeted for their meat. Talk to your biologists. I think many of them would support this.

In summary:

- 1) Please be careful about starting a trend toward more drawing hunts. This would decrease opportunity and as such, was not supported by the survey
- 2) Institute tag fees and aggressively pursue increased options for funding. Please pursue funding! If resources and manpower are a problem then partner closely with ethical hunters who can give you non-biased feedback. Many sheep hunters are completely rabid about hunting sheep and would be very willing to contribute to keeping sheep hunting in a healthy state. Consider deputizing hunters so they can start the reporting/citing process in the field when they see violations. I have reported and tried to report three different hunters/hunting parties over the years. If I would have been deputized to some extent I probably could have helped secure convictions for all three parties. As it was only one individual was successfully cited (for shooting a sublegal ram). The other two parties were violating the law with regard to non-motorized access. Despite my taking pictures...they got away with it.
- 3) Divide the general season and make hunters alternate which period they hunt between years either by name or year. This would effectively and immediately reduce crowding but would not reduce opportunity.
- 4) Severely restrict airplane usage. Lets remember our sheep are white...they are easy to see from the air. There's really no hiding if you're a sheep when it comes to airplanes. The planes can land nearly anywhere. This is a case of protecting the resource!

Thankyou for this opportunity to comment. I'm including a picture of my fifth ram to get you all fired up. Being able to hunt sheep is really such an amazing opportunity. Lets do what we can to keep or make it an opportunity for everyone and yet remember at the same time that it should not be a free or responsibility-free opportunity.

Best Wishes!

Donald Lee III



PC004
5 of 5





Alaska Board of Game
2014/2015 proposed changes to regulations
Central/Southwest Region

Submitted by:
Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

RECEIVED
DEC 23 2014
BOARDS
ANCHORAGE

Proposal 62. Oppose. This is one of the most popular hunts in the State. The game population does not support a general hunt and there are not enough permits to meet the demand of resident hunters. No permits should be allocated to non-residents.

Proposal 63. Support as amended. This proposal would limit permits to 2/household, I would support 1 permit/household. RC566, a subsistence hunt, is limited to one permit/household, drawing permits should not be more liberal.

Proposal 64. Oppose. This will almost ensure that the late fall season will be closed by emergency order. Those restricted to the early fall hunt will increase their pressure to insure they take an animal before their season ends. This will be detrimental to those that are restricted to hunting on foot as they normally hunt later in September.

Proposal 65, 66, 67, 68, 69, 70, 71, and 72. Oppose all. All these proposals seek to amend the CSH program. The basic issue is that there are increasing numbers of participants in this program. What was expected? As population growth in these communities increases the situation will only worsen. The CSH program should be ended. A tier II program as in place years ago should be implemented. The point system first used should be implemented. This means there should be no questions about or points awarded for where food and gasoline are purchased. These questions were added to bias the issuance of permits to rural users. This hunt will continually be challenged until all users are treated equally. The problem is that the hunter population from all user groups is expanding at a rate greater than that of the caribou herd. To effectively manage this hunt for all user groups the Board must restrict access. The use of off-road vehicles needs to be eliminated. The quota will be reached. I know dozens of individuals other than myself who always hunt on foot and are always successful. A number of the proposals express disappointment that the hunt closes without a winter season. Eliminating the use of off-road vehicles would possibly lengthen the season allowing a winter hunt. Allow off-road vehicles in the winter only.

The CSH program should be eliminated. Allow individuals who acquire permits to pool them with others.

Proposal 77. Support. This proposal is reasonable and should prove beneficial to the moose population.

Proposal 80. Support as amended. This would be a most effective tool and should also reduce the number of participants in the CSH program. However, the proposal should be amended to remove the use of off-road vehicles for transport of harvested game, hunters, or gear during the middle of the season.

PG 1 of 2



Proposal 81. Oppose. This would be difficult to police. Elimination of off- road vehicles should be implemented. The use of off-road vehicles in these units is not customary. Four wheelers did not come into use until the mid to late seventies. Shortly after their introduction the hunt was restricted to a drawing hunt. I believe the first year being 1979. Three wheelers were used in the early seventies. And in the 60's the large swamp buggies were used. However, there were few of these.

Proposal 82. Oppose. This proposal essentially wants to provide a guarantee for the CSH harvest quota. This is detrimental to all other users especially those holders of permit RC566. Currently CSH participants have the same opportunity as all other hunters, this proposal would change that by bestowing upon them a guarantee. All hunters should have the same rights. If anything, those hunting under permit RC566 should have the greater opportunity as they give up substantial hunting rights.

Proposal 83. Oppose. A weighted system is profoundly unfair. A drawing hunt gives everyone the same chance. As it is a random drawing all have an equal chance. If someone is lucky and routinely draws a permit so what? At least the chance was equal for all. Non-resident hunters should be banned. If instituted what happens if the program is then discontinued? This happened with the caribou hunt in unit 13. It used a weighted system for two years and was then scraped. Those who did not receive a permit in the first two years were supposed to have been given one in year three, however, when the program was discontinued they were not given preference under the new system.

Proposal 84. Oppose. See comments to proposal 83.

Proposal 85. Support. This would solve some problems with this hunt. No one user group or race is more equal than another. Allowing permit holders to pool their permits makes sense. It is essentially a modified proxy system. This would allow for Ahtna customs without trampling on the rights of others.

Proposal 86. Oppose. Not all permit holders will have the means to hunt during the winter. The winter hunt will require the use of snow machines which are not affordable to all. The Denali highway is not passable during most of the winter or spring hunts. Spring hunts should be discouraged because of the taking of pregnant cows.

Proposal 87. Support. In receiving a Nelchina caribou tier I permit a person must relinquish their right to hunt in other areas of the state. What recourse does a subsistence user have if the Department of fish and Game closes the hunt before a person has had a chance to hunt? How can a person be denied the opportunity to feed his family by hunting elsewhere when the State allows for a drawing hunt for the same population?

Proposal 88. Support. I live in Anchorage yet I am a true subsistence user, all meat and fish consumed in my household comes from what I kill or catch, vegetables come from my garden etc. Yet, because I live in the city I am discriminated against when it comes to subsistence. This proposal would eliminate that by treating all subsistence users equally.

Proposal 89. Support. Comments given on other proposals are relevant to this one.



Submitted By
Robert Godwin
Submitted On
10/27/2014 1:09:43 PM
Affiliation
hunter

Phone
907 248 7603

Email
bobbersg@hotmail.com

Address
2101 w 45th ave #1
Anchorage, Alaska 99517

I just fairly recently hunted in 16B during the DM540 hunt under the permit I won. I was surprised by the lack of moose sign that I saw, in the area that I chose. I took a 70 inch bull out of there in 2000. There was more sign and more moose then. I did see three moose over 5 days. I was not successful. I have scouted the unit and have not seen very many moose. I was wondering why you have a hunt for any bull and why you have a tier two season for three and a half months. How do you ever expect the bull population to ever build up so that there are ever huntable numbers for a regular season hunt. Why a tier II for three and a half months instead of one month. That must be a slaughter. Where is the science behind a 3 1/2 month season where they can drive right up to the moose on snowmachines? How about some more moose for the rest of us? Why not shorten the tier season and increase the population? Like I say, what is your science behind your seasons? Or is it all political? You tell me instead of letting me guess. Explain to me how this is sound management. By the way, What does "allow the use of a snowmachine to position a wolverine or wolf for harvest and allow these animals to be shot from a stationary snowmachine.", mean? Does that mean pursue, stop and shoot? I await your answers, but doubt if I will get one.



Attention: Board of Game Comments
Alaska Department of Fish and Game,
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526
Submitted via email on time to: dfg.bog.comments@alaska.gov

Subject: Support for BOG Proposal 105-AAC 95.505. Palmer Hay Flats State Game Refuge

2015 January 19

Dear Alaska Department of Fish and Game, Boards Support Section:

I strongly support Board of Game Proposal 105 submitted by Tom Rothe regarding Palmer Hay Flats State Game Refuge additions. Since the parcels formerly named M'Karzel, Williams, Fritzier, Cassity, and Cope (and any other similarly situated acquisitions in state ownership) were made available for addition to the refuge for fish and wildlife habitat, hunting and fishing, secure public access, outdoor education, and other compatible uses, it is important that the Legislature formally accept said lands so that they may be properly managed for the people of Alaska by the Alaska Department of Fish and Game. These lands have already been purposefully purchased with private funds and transferred to the Department of Natural Resources, with conservation easements for incorporation into Palmer Hay Flats State Game Refuge.

I urge the Board of Game to write the Legislature now and help complete this process which will enable the Alaska Department of Fish and Game to manage the lands in a way that is that is consistent with refuge goals and management plans to address current issues as they arise. This will benefit the people of Alaska, not only now, but for future generations.

Again I strongly support BOG Proposal 105 and urge you to write the Legislature and engage them in the necessary process to incorporate these lands, as intended, into the Palmer Hay Flats State Game Refuge.

Thank you for your attention to these important details.

Sincerely,
Barbara Švarný Carlson

Barbara Švarný Carlson
PO Box 220196
Anchorage, Alaska 99522-0196



Submitted By
Jason Mogen
Submitted On
1/13/2015 12:09:52 PM
Affiliation
Alaska Premier Outfitters

Phone
907-464-6023

Email
jmogen@alaskapremieroutfitters.com

Address
74 school rd
Ekwok, Alaska 99580

What I am trying to accomplish with Proposal #53 is letting us bait and use scents in Unit 17 for Brown bear. This area is heavily forested more so in reference to the country below the Nuyakuk River along with most of the Mulchatna River drainage. The mature boars that call this area home rarely expose themselves out on the river, their trail systems wind throughout the forest making it very difficult for even the most dedicated guide to effectively and successfully hunt them. I have had to purchase thousands of dollars' worth of tree stands to set up on these trails which is labor intense and dangerous for most clients to hunt out of just to level the playing field and get a chance at one of these big bears. I don't believe that a 2 bear area is the answer to the overcrowding issue with the bears out here all it does is promote the taking of any bear which usually results in the taking of a smaller bear and more than often the taking of sows. If we are to manage this area effectively then we have to understand that it is not the small bears that are the problem, but rather the older more mature boars that are 10 years or older it is these bears that are damaging the moose population this can be observed every spring after hibernation and during calving season they are specialized at catching moose calves and do it with great success. Allowing us to use bait sites along with scents would give us the opportunity to make sites in the area's that we know were a large boar is and hunt that bear specifically resulting in the taking of a mature animal which is the whole point to managing any animal that we hunt.

I understand that in my proposal #53 in which I am asking for the relocation of naturally killed winter moose carcass's is more than the board would allow however I don't see why we can't use these moose to aid in the taking of a big bear as otherwise these carcass generally just go to waste or get washed down river and out to the bay. However I would asked that the board consider and allow us to use baiting techniques in unit 17 as this would not negatively hurt anyone and give us another means to take out mature bears, it has already been allowed in 13 of the 26 units in Alaska which is 50% of the units.

Thanks.

Jason Mogen



Submitted By
Roger Pearson
Submitted On
1/22/2015 10:27:00 AM
Affiliation

Phone
907 457 3124
Email
rpearson2001@yahoo.com

Address
1364 Little Fox Trail
Fairbanks, Alaska 99712

I don't feel it is prudent to change any of the Sheep Regulations at this time.

More restrictions just limit access.

Thinking out of the box.

I do think the state of Alaska and Hunters nation wide should fight to get Gates of the Arctic and

Wrangel Saint Elias National Parks open to hunting.



Submitted By
Eric Nordstrom
Submitted On
1/22/2015 12:13:36 AM
Affiliation

Airplane Transportation Recommendations Comment:

If you have intentions of spreading out hunting pressure throughout the season--you must realize that all private pilots who sheep hunt will be hunting the first week of the season if they are law abiding citizens. If I can fly and look for sheep on August 8th and 9th--why would I spot sheep then and try to hunt them anytime other than right away? In addition, this type of policy leaves significant leniency for the guides to continue to spot sheep throughout the season by airplane, and in this respect gives them an unfair advantage throughout the remainder of the season. Sure you will say that the rules apply to them also, but there is plausible deniability when a guide or 135 operator is flying in and out of camps all the time with supplies etc. to say that they are simply on a supply trip and are not looking for sheep along the way.

Although I understand the intention, this type of policy demonstrates a lack of insight into the private sheep hunter/pilot's perspective and hunting motivations. That is unless of course the intention is to either increase utilization of 135 operators and guides, or to decrease private resident hunting days altogether. If that is the case, neither of these goals seem to be out of consideration for the private resident hunter--a group who deserves as much or more consideration than any other based upon both State Constitution as well as the tradition of the people of Alaska.



Submitted By
Mike Vanstrom
Submitted On
1/16/2015 6:23:23 PM
Affiliation

Phone
602-741-1463

Email
mikev@alaskapremieroutfitters.com

Address
75 school rd
Ekwok, Alaska 99580

Michael Vanstrom
Alaska Premier Outfitters
602-741-1463
mikev@alaskapremieroutfitters.com
75 school rd.
Ekwok, Ak 99580
I Support Proposal #53

I have been a guide in unit 17 for the past 11 years and what I would like to see accomplished with Proposal #53 is letting us use bait and scents in Unit 17 for Brown bear. This area is heavily forested along the river drainages which makes hunting mature boars very difficult during shooting hours. Baiting would allow a mature boar to take over a site and then lead to the harvest of that animal which is what is sought after and should be the focus of management. This being a two bear area with no baiting or scents is promoting to many sows and juveniles to be harvested as they are more likely to be in open and on river during shooting hours. The harvest of sows and juveniles does nothing for management of the moose population.

The older more mature boars that are 10 years or older are the bears that are damaging the moose population this can be observed every spring after hibernation and during calving season, they are specialized at catching moose calves and do it with great success. Allowing us to use bait sites along with scents would give us the opportunity to make sites in the area's that we know were a large boar is and hunt that bear specifically resulting in the taking of a mature animal which is the whole point to managing any animal that we hunt.

I would asked that the board consider and allow us to use baiting techniques in unit 17 as this would not negatively hurt anyone and give us another means to take out mature bears, it has already been allowed in 13 of the 26 units in Alaska which is 50% of the units.

I Support Proposal #53
Thank you
Michael Vanstrom



Submitted By
Luke Graham
Submitted On
1/14/2015 11:28:32 PM
Affiliation

Regarding Proposal 116: I Support This Proposal

To whom it may concern:

The current issues regarding Dall Sheep hunting in Alaska are all too real and must be solved within a timely manner. Hunter crowding and a decrease in Dall Sheep population has led to less available legal rams for resident hunters. General Season harvest areas are seeing higher guided non-resident harvest numbers than ever before. In some portions of the state these numbers are in excess of 50% units 20A and 19C being prime examples. Unit 19C alone had a non-resident harvest level near ~75% in 2013. This is completely unacceptable when the non-resident harvest rate for trophy big game in all western states is limited to ~10%.

It is my opinion that Dall Sheep hunting quality for residents and non-residents would be vastly improved if the total amount of non-resident Dall Sheep harvest was reduced and each unit in Alaska had the same level of non-resident harvest. In other words, non-resident harvest of dall sheep should be uniform across the state of Alaska. Currently there is a huge disparity in non-resident/resident sheep harvest between different units across Alaska. Where guide numbers are regulated vs. areas where they are not seems to make the harvest numbers fluctuate greatly for residents and non-residents in this state. As a result of this it encourages resident hunters to congregate in areas where the non-resident take is lower since they feel they will have a better chance at harvesting a sheep. For example, unit 19C in the Alaska range has a non-resident harvest of around ~75% and unit 20A has a rate of ~51% both of which are very high rates compared to units 26B and 26C in the Brooks range which have non-resident harvest rates of ~25% and ~33%. Guide numbers are less regulated in 19C and 20A which shows why the harvest level is much higher. If the numbers for non-resident Dall Sheep harvest were more uniform across the state, hunters would be encouraged to hunt all units since harvest levels for non-residents would be the same across Alaska. This would reduce crowding and increase level of enjoyment while hunting for both residents and non-residents

It is my recommendation that the board of game reduce the harvest level of non-resident sheep harvested in all units of the Central/Southwest Region. In order to accomplish this task I would propose they allocate a certain level of non-resident tags to accommodate a 10% total maximum harvest level of Dall Sheep by non-residents. This could be achieved by either instituting a non-resident drawing for these tags (if the demand by non-residents was strong enough). Or, they could simply sell tags on a first come first serve basis by each individual unit. Currently, the state of Idaho has a similar method with their non-resident elk tags. The tags go on sale the first of the year and are sold for each unit until the quota for that unit is met. This would eliminate having to go to a drawing system for non-resident tags while still limiting the non-resident harvest of Dall Sheep.

Finally, another current problem we see with sheep hunting in this Alaska is due to an increased harvest level by guided non-residents during the first week of the season. Since many legal rams are harvested during the first week of the season, residents are encouraged to hunt opening day in order to have a better chance at harvesting a ram. This leads to crowding issues on opening day in most units. If more legal sheep were available later in the season, then the incentive to hunt early would be reduced and as a result crowding would diminish. In order to achieve this, I would recommend that the board of game reduce the amount of non-resident hunters a master/registered guide is allowed to have in the field for Dall Sheep hunting to a maximum of 2 clients. Currently British Columbia, Canada limits their sheep hunting guides to having only 2 clients allowed in the field at a time. This would reduce master guides from utilizing multiple assistant guides to send out the majority of their clients during the first week of the season. If this rule were adopted we would see less non-resident hunters in the field on opening day. This in turn would lead to less crowding since fewer non-residents hunters would hunt opening day and also because less residents would hunt early if they knew there were more legal sheep available for harvest later in the season. In addition reducing crowding, this rule would also lessen the amount of sub-legal rams killed by guided hunters since they would be more likely to hunt with an experienced master or registered guide rather than an inexperienced assistant guide. Client safety would also increase since most registered/master guides have a better understanding of protecting their clients from weather, mountainous terrain and the harsh Alaskan environment.

In conclusion, it is my recommendation that the board of game use the above methods to restrict the harvest of Dall Sheep by guided non-resident hunters and leave current resident general season Dall Sheep hunting regulations unchanged.



TO ADDRESS THE BOARD GENERATED SHEEP PROPOSAL

JAN 20, 2014

Dear Board Members,

After reviewing the board generated sheep proposal, I have some comments. First, I'll give a little bit of background about myself. My name is Tyler Freel. I have lived in Fairbanks for just short of 13 years, and have been hunting sheep for the past 11 of those years. I have been pretty successful, taking 9 legal rams in those years, and have seen the sheep hunting crowding and other issues develop firsthand. I am extremely passionate about sheep hunting, and although I am with a small minority of the hunters who live for it, I believe as residents and along with you, collective owners of our state's resources, that our educated opinions are warranted reasonable consideration.

As I have mentioned in comments I have made to the board in the last meeting in Fairbanks, I saw the crowding begin to become an issue after the Chugach mountains were made into a draw only area. The guide overcrowding issues on state land, and in my personal experience, the Alaska Range have been an issue for a lot longer, but the fruits of it finally came to bear once the Chugach was locked up. After the Chugach went all draw, there was an immediate and significant increase in the number of hunters from Anchorage hunting in the current area I was hunting. From general consensus that I gathered from other sheep hunters, the whole Brooks Range saw a similar increase in traffic. The common theme from these hunters was that they were displaced by the Chugach going to draw. Now unable to hunt the Chugach, these hunters, along with myself avoided the Alaska range because of the large number of outfitters and their bad experiences with them there. I myself, had an outfitter in the Wood River drainage fly around to find where I was camped, then, on opening morning, attempt to sneak in on a group of rams I had been watching.

All that being said, I would like to address the non-resident portion of the proposal first. I have for years, been a proponent of using a limited draw for non-residents to suppress the outfitter crowding in the state areas, and I believe this and a reduced, well-studied allocation of the permits would help the problem by making these areas more friendly to resident hunters as well as provide some relief for the many rams that are clipped off as soon as they are close to legal.



The only issue I have with making state/BLM areas draw for NR, but keeping the guide concession federal areas on a harvest ticket system, while putting any of the resident you list into effect, would be a discriminatory action against resident hunters, in that we would be subject to draw or registration, and shorter seasons, while the non-residents would have over the counter opportunity with their whole 10 day hunt. Also, under this plan, I myself would be subject to these restrictions, but if I had a brother living out of state he could get a tag without question every year. How is this right? At the very least, I think they should be all draw for non-residents as well, even with the same numbers of permit allocations that are currently offered. This would put everyone on a more level playing field.

Second, I have several issues with the suggested resident options. Why is there no option for at least a trial period of resident hunts remaining as the status quo, but non-residents going to draw only for the areas listed? Why not make the Chugach Range a registration area with a quota? From previous discussion with some board members, the statement that we all must share in the pain, and the fact that with a non-resident change, the board feels they must restrict residents without even a trial period of cutting back on the non-resident hunting in contested areas, is frankly insulting, and to many of us implies a punitive, disdainful attitude towards resident sheep hunters. It gives many of us the impression that rather than a genuine effort to solve the problem, the board might have the attitude of punishing through restriction, the resident sheep hunters for bothering the board with this issue over the last several years.

I am totally opposed to the resident draw-only options listed for several reasons. First, as you well know, generally, once a hunt goes to a draw, it never comes back to general harvest. Also, as the board is well aware of, with the current draw system, if this is put into place, I literally may never draw a sheep tag in the entire remainder of my life. This is unacceptable to me.

A more factual reason I am opposed to this is that this proposed draw, pushing back the general seasons will not only limit people because some do not want to go late, but also because of logistics. Generally, very few air transporters will fly hunters into the Brooks Range at the end of August or beginning of September depending on the transporter. Also, with draw results coming out in late winter, many of these transporters will be booked up with moose hunters before people



even know the results of the draw. The only draw season that stands a chance at this not being a disaster is option 3 with a draw season ending aug 19th. Although this is the least painful of the draw options, I believe it is still warranted to hold off on excessive restrictions for residents until a trial period of non-resident draws is completed, then re-evaluate the situation.

The registration option is the least offensive of the options listed, however, a board with an appreciation for the money and time that those of us who are serious put into a sheep hunt would see that this is ridiculous. It eliminates the vast majority of hunting options during the time we would be forced to try and hunt after the 7th of September.

I cannot attend the meetings in which the board will take up this proposal, but I would like to argue that at least a trial period of non-resident draw to cut down on excessive outfitter take and conflict, while keeping residents on a general harvest, ideally changing the formerly general harvest Chugach areas to a quota registration hunt would greatly alleviate a lot of the crowding issues. I do not see increased resident restrictions as a necessity at this point, it would only come across as an insult and destroy what little faith we have that the board's intentions are to manage for abundance and serve in the best interest of its fellow residents and owners of the resources.

Sincerely,

Tyler Freel

1066 Smallwood Trail B

Fairbanks, AK 99712

Tylerfreel85@hotmail.com

(907) 378-8020



Submitted By
Annette Burroughs
Submitted On
1/14/2015 2:35:13 PM
Affiliation

Phone
907 678-2006

Email
mezzrichards@gmail.com

Address
Wiseman Village
Wiseman, Alaska 99790

Regarding Board Generated RC019 for nonresident sheep hunters I support your proposal #1, a limited draw for the entire season, permit allocation by subunit, but would like to suggest a further restriction of one sheep limit every 4 years for nonresidents and to eliminate nonresident sheep hunting with a next-of-kin relative.

Options for resident hunters I support option 5, a season based on last name.

I support all 4 of the options for Potential changes to use of aircraft for sheep hunting.

Thanks!



Submitted By
Lance Raymore
Submitted On
1/16/2015 3:02:45 PM
Affiliation

Proposals 132 and 192 are not needed actions. The current HIP data collection process has been determined by the USFWS and the ADFG to be sufficient for documenting hunter harvest of waterfowl in the US.

Proposal 194, My family dog is a hunting dog. So if I am walking my family dog on 11/1 and she gets stuck in a trap will I be breaking the law? Only if I have a firearm legal for upland bird harvest in an area with an open season? What if my neighbor's husky gets caught in a trap? Is that OK? But what if her husky is half lab? She's a vegan so she won't be hunting. This proposed regulation is preposterous.

Proposal 181. Requiring traps to be set a far distance from a public use trail or road is a good idea.

Sheep proposals (too numerous to list out).

Statewide non resident allocation determined by drawing is a good idea.

Increase the non resident fee to similar fees from other sheep hunting states. The state should exploit the resource financially.

Increase the resident fee to \$100 for sheep harvest ticket. I don't hunt sheep every year, but a free harvest ticket for a limited resource makes little sense.

Establishing a time duration for shooting after flying in sounds like a good idea, but in areas where walk in hunters and flown hunters can compete (TMA drainages on the north and east areas) the advantage is to the walk in hunters, but it all depends on timing or your arrival. If made a full 24 hours after arrival that may help with a perception of the issue. Hard to deal with the local TMA air service providers flying every day overhead checking on their customers. From my own experience that annoys sheep.



IN REPLY REFER TO:

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199



FWS/OSM 15001.PM

JAN 23 ~~2014~~ 2015

Mr. Ted Spraker, Chairman
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

ATTN: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet February 13-20, 2015 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central/Southwest Region. We have reviewed the 101 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.,
Assistant Regional Director
Office of Subsistence Management



Chairman Spraker

2

Enclosure

cc: Tim Towarak, Chair, Federal Subsistence Board
Chuck Ardizzone, Deputy Assistant Regional Director
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Boards Fish and Game, Board of Game
Alaska Department of Fish and Game
Bruce Dale, Acting Wildlife Division Director, Alaska Department of Fish and Game
Jennifer Yuhas, Federal Subsistence Liaison Team Leader,
Alaska Department of Fish and Game
Federal Subsistence Board
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS
ALASKA BOARD OF GAME PROPOSALS

Central/Southwest Alaska Region

February 13-20, 2015

Wasilla, Alaska

U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM)



Proposal 43 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports.

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

Proposal 52 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Adjust the nonresident closed area in Togiak National Wildlife Refuge in Unit 17A and extend the season.

Current Federal Regulations:

Unit 17 – Moose

Unit 17A – 1 bull by State registration permit.

Aug. 25 – Sept. 20

Unit 17A – up to 2 moose by State registration permit.

*Up to a 31 – day season
may be announced between
Dec. 1 – Jan. 31.*



Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Extending the nonresident moose season could lead to increased competition for Federally qualified users and seems premature at this time after only one season with a nonresident hunt. More population information is needed before changing the harvest policy.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: More time is needed to see if the current harvest strategy can be modified to allow for a longer nonresident season. Bulls become more vulnerable to harvest as the season progresses and managers need time to see if participation in the nonresident drawing hunt increases and how success rates change (if at all) over time. Therefore, extension of the season by 5 days is not yet warranted at this time.

Proposal 54 – 5 AAC 92.220. Salvage of game meat, furs, and hides. Allow the sale of brown bear hides and skulls in Unit 17 by resident hunters.

Current Federal Regulations:

Unit 17 – Brown Bear

Unit 17– 1 bear by State registration permit only.

Sept. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Federally qualified users have been able to take advantage of the increasingly liberalized State brown bear hunting regulations in Unit 17 over the years. This regulation would allow locals to sell the hides and skulls of bears they harvest. Harvest would likely increase as a result of this regulation since Unit 17 would become the only area of the State where brown bear hides and skulls could be sold.

Federal Position/Recommended Action: The OSM recommendation is to **opposes** this proposal.

Rationale: Harvest of brown bears has increased steadily in Unit 17 over the last few decades as a result of increasingly liberal State hunting regulations. Allowing the sale of brown bear hides and skulls could



lead to even higher levels of harvest and could increase hunting pressure on brown bears in adjacent Units as well. Given that there is no objective data on the brown bear population in Unit 17, further increase in harvest is not warranted at this time.

Proposal 55 -5 AAC 84.270. Trapping seasons and bag limits, and 92.095(3). Unlawful methods of taking furbearers; exceptions. Remove the bag limit and modify the salvage requirements for harvesting beaver with a firearm during the trapping season in Unit 17, and allow the harvest with bow and arrow as follows:

In Unit 17 under beaver trapping regulations, allow the use of firearms or bow and arrow for beaver trapping October 10 to May 31 with no daily or seasonal limit. No requirement to salvage meat for human consumption. Meat or hide must be salvaged for use.

Current Federal Regulation:

Unit 17 – Beaver

No Limit.

Oct. 10 – Mar. 31

2 beaver per day. Only firearms may be used.

Apr. 15 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Removing the bag limit during the spring could increase the mortality of beaver kits, which are born from late April to June, if their parents are taken. The use of a bow and arrow and removal of the salvage requirements is likely to increase the wounding loss rate and possible waste of the resource.

Federal Position/Recommended Action: The OSM recommendation is to **opposes** this proposal.

Rationale for comment: If this proposal is adopted Federal and State regulations would be out of alignment with respect to the harvest limits and the use of firearms which could cause confusion and potential law enforcement problems. Increasing the harvest limit of beavers taken with a firearm during the spring when kits are born and removal of the salvage requirements is likely to result in waste of the resource.



Proposal 56 -5 AAC 84.270(1). Trapping seasons and bag limits, and 92.095(3). Unlawful methods of taking furbearers; exceptions. Remove the bag limit and the requirement to salvage meat for human consumption for beaver taken with a firearm during trapping season in Unit 17 as follows:

It is against the law to take beaver by any means other than a steel trap or snare except: **In Unit 17, a firearm may be used to take beaver during the established season and with no bag limits.** [In Unit 17, a firearm may be used to take 2 beaver per day provided that the meat is salvaged for human consumption]

Current Federal Regulation:

Unit 17 – Beaver

No Limit.

Oct. 10 – Mar. 31

2 beaver per day. Only firearms may be used.

Apr. 15 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Removing the harvest limit during the spring could increase the mortality of beaver kits, which are born from late April to June, if their parents are taken. The removal of the salvage requirements is likely to increase the wounding loss rate and possible waste of the resource. Pelts are not in prime condition in the spring so few hunters would likely be impacted if this proposal was adopted.

Federal Position/Recommended Action: The OSM recommendation is to **opposes** this proposal.

Rationale for comment: If this proposal is adopted Federal and State regulations would be out of alignment with respect to the harvest limits and the use of firearms which could cause confusion and potential law enforcement problems. Maintaining the harvest limit and salvage requirements for beaver taken with a firearm will reduce the harvest during the spring when beaver kits are dependent upon their parents.

Proposal 57 -5 AAC 84.270. Trapping seasons and bag limits, and 92.095(3). Unlawful methods of taking furbearers; exceptions. Modify the trapping season dates and bag limit for beaver in Unit 17, and prohibit the taking of beaver with firearm.



Current Federal Regulation:

Unit 17 – Beaver

No Limit.

Oct. 10 – Mar. 31

2 beaver per day. Only firearms may be used.

Apr. 15 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Reducing the bag limit to 40, shortening the season by 10 days, and prohibiting the use of a firearm is unlikely to have any significant impact on the beaver population or limit the ability of hunters to harvest beaver. While local reductions of beaver due to hunting in the easily accessible areas may occur, the overall beaver population in Unit 17 is healthy.

Federal Position/Recommended Action: The OSM recommendation is to **opposes** this proposal.

Rationale for comment: If this proposal is adopted Federal and State regulations would be out of alignment with respect to the harvest limits and the use of firearms which could cause confusion and potential law enforcement problems.

Proposal 118 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Begin resident sheep hunting seven days earlier than nonresidents in Units 9, 11, 13, 14 and 16.

Current Federal Regulation:

Unit 9 – Sheep

Unit 9B-that portion within Lake Clark National Park and Preserve-1 ram with ¾ curl or larger horn by Federal registration permit (FS0901) only. By announcement of the Lake Clark National Park and Preserve Superintendent, the summer/fall season will be closed when up to 5 sheep are taken and the winter season will be closed when up to 2 sheep are taken.

July 15 – Oct. 15

Jan. 1 – Apr. 1

Unit 9B remainder-1 ram with 7/8 curl horn or larger by Federal registration permit (FS0903) only.

Aug. 10 – Oct. 10



Unit 9 remainder-1 ram with 7/8 curl horn or larger. Aug. 10 – Sept. 20

Unit 11 – Sheep

Unit 11 General Hunt-1 sheep Aug. 10 – Sept. 20

Unit 11 Elder Hunt-1 sheep by Federal registration permit (FS1104) only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken. Aug. 1 – Oct. 20

Unit 13 - Sheep

Unit 13, excluding Unit 13D, the Tok Management Area, and the Delta Controlled Use Area-1 ram with 7/8 curl horn or larger. Aug. 10 – Sept. 20

Unit 13D, the Tok Management Area, and the Delta Controlled Use Area No Federal open season

Unit 14 – Sheep

Unit 14A and 14C No Federal open season

Unit 16 – Sheep

No Federal subsistence priority No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Adoption of this proposal is not likely to increase harvest of sheep, but could increase harvest by Alaska residents. It may also lead to a decrease in harvest by Federally qualified users as a result of non-Federally qualified users harvesting sheep earlier in the season in some areas. However, Federally qualified users would also be able to hunt during the earlier season, but they would not be able to do so under the more liberal Federal harvest limits.

Federal Position/Recommended Action: While OSM is **neutral** on this proposal, we would like to point out a few potential impacts this could have for Federally qualified subsistence users.

Rationale: Currently, Federally qualified subsistence users are provided a priority over non-Federally qualified users through less restrictive harvest regulations in some areas that include provisions for any



sheep, ¾ ram, or 7/8 curl ram. In many of the affected units, the Federal sheep season dates are the State seasons. If all Alaskan residents, including Federally qualified users, are allowed to hunt a week earlier, then Federally qualified subsistence users would either have to compete with non-Federally qualified users for full curl rams only or they may choose to wait until the Federal Subsistence season opens and then take advantage of the more liberal Federal sheep regulations and longer season available in some areas. Waiting until the later Federal season opens could put Federally qualified users at a disadvantage as fewer sheep would likely be available after that first week and the sheep may be displaced into areas less accessible to subsistence users. If this proposal were adopted it may also prompt Federally qualified users to submit proposals to the Federal Subsistence Board to modify the Federal subsistence season dates.

Proposal 119 - 5 AAC 85.055. Seasons and bag limits for Dall sheep. Establish earlier season date openings for resident sheep hunting in the Central/Southwest Region as follows:

Sheep hunting dates for all of the Central/Southwest Region:

Residents: August 3th – September 20th

Nonresidents: August 10th – September 20th

See comments for Proposal #118.

Proposal 121 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify season dates for Dall sheep in the Interior Region as follows:

Resident hunting seasons for Dall sheep shall be August 3rd to September 20th. Nonresident hunting season shall be from August 10th to September 20th. Drawing permit areas will start seven days earlier for Alaska residents and if there is a split season, the second half will be shortened by seven days for nonresidents such that residents can start the second half seven days prior to nonresidents.

Current Federal Regulation:

Unit 12 – Sheep

Unit 12 General Hunt – 1 ram with full curl horn or larger. Aug. 10 – Sept. 20

Unit 12 Elder Hunt, that portion within Wrabgell-St. Elias National Park and Preserve – 1 ram with full curl horn or larger by Federal registration permit (FS1201) only, by persons 60 years of age or older Aug. 1– Oct. 20



Unit 19 – Sheep

Unit 19 – 1 ram with 7/8 curl or larger *Aug. 10 – Sept. 20*

Unit 19C – that portion within Denali National Park and Preserve – residents of Nikolai only – no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community harvest reporting system. *Oct. 1 – Mar. 20*

Unit 20 - Sheep

Unit 20E – 1 ram with full-curl horn or larger. *Aug. 10 – Sept. 20*

Unit 20, remainder *No open season*

Unit 24 – Sheep

Units 24A and 24B – that portion within the Gates of the Arctic National Park, excluding Anaktuvuk Pass residents – 3 sheep *Aug. 1 – Apr. 30*

Units 24A and 24B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park – Community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe. *July 15 – Dec. 31*

Unit 24A – except that portion within the Gates of the Arctic National Park – 1 ram by Federal registration permit only. (FS2404) *Aug. 20 – Sept. 30*

Unit 24 remainder – 1 ram with 7/8 curl horn or larger *Aug. 10 – Sept. 20*

Unit 25 – Sheep

Unit 25A – that portion within the Dalton Highway Corridor Management Area. *No Federal open season*

Unit 25A – Arctic Village Sheep Management *Aug. 10 – Apr. 30*



Area – 2 rams by Federal registration permit (FS2502) only.

Federal public lands are closed to the taking of sheep except by rural Alaska residents of Arctic Village, Chalkyitsik, Fort Yukon, Kaktovik, and Venetie, hunting under these regulations.

Unit 25A remainder – 3 sheep by Federal registration permit only. Aug. 10 – Apr. 30

Units 25B, 25C, and 25D – 1 ram with full-curl horn or larger. Aug. 10 – Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Adoption of this proposal is not likely to increase harvest of sheep, but could increase harvest by Alaska residents. It may also lead to a decrease in harvest by Federally qualified users as a result of non-Federally qualified users harvesting sheep earlier in the season in some areas. However, Federally qualified users would also be able to hunt during the earlier season, but they would not be able to do so under the more liberal Federal harvest limits.

Federal Position/Recommended Action: While OSM is **neutral** on this proposal we would like to point out a few potential impacts this could have for Federally qualified subsistence users.

Rationale: Currently, Federally qualified subsistence users are provided a priority over non-Federally qualified users through less restrictive harvest regulations in some areas that include provisions for any sheep by Federal registration permit, or 7/8 curl ram. In many of the affected units, the Federal sheep season dates are the State seasons. If all Alaskan residents, including Federally qualified users, are allowed to hunt a week earlier, then Federally qualified subsistence users would either have to compete with non-Federally qualified users for full curl rams only or they may choose to wait until the Federal Subsistence season opens and then take advantage of the more liberal Federal sheep regulations and longer season available in some areas. Waiting until the later Federal season opens could put Federally qualified users at a disadvantage as fewer sheep would likely be available after that first week and the sheep may be displaced into areas less accessible to subsistence users. If this proposal were adopted it may also prompt Federally qualified users to submit proposals to the Federal Subsistence Board to modify the Federal subsistence season dates.



Proposal 122 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep hunting seasons seven days before nonresident seasons in the Interior Region as follows:

Sheep season dates in Region III:

Alaska residents: August 5 – September 20
Nonresidents: August 12 – September 20

See comments for Proposal #121.

Proposal 123 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep seasons ten days before nonresident seasons in the Interior region as follows:

In Region III (Interior Region), change the dates for sheep hunting to:

Alaska residents: August 1 – September 20
Nonresidents: August 10 – September 20

See comments for Proposal #121.

Proposal 124 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Open resident sheep seasons on week prior to nonresidents in Units 25 and 26 as follows:

Residents have the first week of sheep season without the presence of guides and their hunters.

Current Federal Regulation:

Unit 25 – Sheep

Unit 25A – that portion within the Dalton Highway Corridor Management Area. No Federal open season

Unit 25A – Arctic Village Sheep Management Area – 2 rams by Federal registration permit (FS2502) only. Aug. 10 – Apr. 30



Federal public lands are closed to the taking of sheep except by rural Alaska residents of Arctic Village, Chalkyitsik, Fort Yukon, Kaktovik, and Venetie, hunting under these regulations.

Unit 25A remainder – 3 sheep by Federal registration permit only. Aug. 10 – Apr. 30

Units 25B, 25C, and 25D – 1 ram with full-curl horn or larger. Aug. 10 – Sept. 20

Unit 26 – Sheep

Unit 26A – those portions within the Gates of the Arctic National Park, excluding Anaktuvuk Pass residents – 3 sheep Aug. 1 – Apr. 30

Unit 26A – that portion west of Howard Pass and the Etivluk River (DeLong Mountains) – 1 sheep by Federal registration permit (FS2607). The total allowable harvest of sheep for the DeLong Mountains is 8, of which 5 may be rams and 3 may be ewes. Aug. 10 – Apr. 30
If the allowable harvest levels are reached before the regular season closing date, the Superintendent of the Western Arctic National Parklands will announce early closure. July 15 – Dec. 31

Units 26A and 26B – those portions within the Gates of the Arctic National Park, Anaktuvuk Pass residents only – community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe.

Unit 26B – that portion within the Dalton Highway Corridor Management Area – 1 ram with 7/8 curl horn or larger by Federal registration permit (FS2602) only. Aug. 10 – Sept. 20

Units 26A and 26B remainder (including the Gates of the Arctic National Preserve) – 1 ram with 7/8 curl horn or larger. Aug. 10 – Sept. 20

Unit 26C – 3 sheep per regulatory year; the Aug. 10 – Sept. 20 season is restricted to 1 ram Aug. 10 – Sept. 20



with 7/8 curl horn or larger. A Federal registration permit (FS2603) is required for the Oct. 1 – Apr. 30 season.

See comments for Proposal #121.

Proposal 126 -5 AAC 92.015 Brown bear tag fee exemption. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports.

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **supports** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

Proposal 133 -5 AAC 92.080. Unlawful taking of game; exceptions. Remove the restriction against using felt sole waders while hunting in Central/Southwest Region Units.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use felt-soled wading boots.



Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25, 2015.

Impact to Federal Subsistence users/wildlife: The prohibition of felt-soled wading boots could impact subsistence users by requiring them to purchase new gear; however, the use of felt-soled wading boots has been associated with the introduction of invasive species, such as didymo (*Didymosphenia geminata*), mycospores of the parasite that causes whirling disease (*Myxobolus cerebralis*), and New Zealand mudsnails into aquatic environments. Introductions of invasive species could result in significant impacts to habitats and subsistence resources in Alaska.

Federal Position/Recommended Action: The OSM is **neutral** on the proposal.

Rationale: The OSM recognizes the importance of protecting Alaskan environments and important subsistence species from the effects of invasive species; however, this issue has not been assessed through the Federal regulation process. It is recognized that field gear is a potential pathway for transmitting invasive species and therefore the OSM supports educating hunters who spend time in aquatic environments about the risk of spreading invasive organisms and effective disinfection procedures.

Proposal 138 -5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Units 20A, 20B, and 20D:

Current Federal Regulation:

Units 20A, 20B, 20D – Moose

<i>Unit 20A—1 antlered bull</i>	<i>Sept. 1 – Sept.20</i>
<i>Unit 20B—that portion within the Minto Flats Management Area –1 bull by Federal registration permit only.</i>	<i>Sept. 1 – Sept.20 Jan 10 – Feb. 28</i>
<i>In Unit 20B remainder—1 antlered bull.</i>	<i>Sept. 1 – Sept. 20</i>
<i>Unit 20D</i>	<i>No Federal open season.</i>

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 20A, 20B, and 20D would allow additional opportunity for Federally qualified subsistence users to harvest



moose. Antlerless moose harvest under the State regulations is limited primarily through the use of drawing permit hunts. Moose populations in Units 20A, 20B, and 20D are healthy and thus reauthorizing the antlerless season is not anticipated to have a negative impact on these populations.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale for comment: Reauthorizing the State antlerless season will maintain management flexibility within Units 20A, 20B, and 20D and give Federally qualified subsistence users additional opportunity to harvest moose in these units.

Proposal 139 -5 AAC 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports.

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations through March 25th, 2015.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear (\$25 resident tag) in these Units if the tag fee exemptions are not reauthorized.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.



THE WILDLIFE SOCIETY ALASKA CHAPTER

5800 Kalgin Drive
Anchorage, AK 99516

The Alaska Chapter of The Wildlife Society is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Spraker and Board Members,

I am writing in support of BOG proposal 105, a proposal to expand the Palmer Hay Flats State Game Refuge. This proposal would "set aside" lands that have already been acquired and transferred to the state for addition to the Palmer Hay Flats State Game Refuge. It does not increase land ownership by the state, does not impose land use restrictions beyond normal refuge management, nor does it impose an additional financial burden on the state.

These lands were conveyed to or acquired by the state with the intent that they be included within the refuge boundaries. Although the state now owns these lands under ADNR oversight, the Alaska Department of Fish and Game has no management authority over them without legislative action. Thus, ADF&G cannot undertake habitat improvements or manage public access, and enforcement of violations is unclear.

Passage of this proposal would be a valuable step in ensuring ADF&G can manage these lands consistent with refuge goals and management plans and address current issues.

I hope that the board will support this proposal to help facilitate expansion of the refuge and to ensure the quality of the land remains undiminished.

Sincerely,

Grant Hilderbrand
President, Alaska Chapter of The Wildlife Society



Submitted By
Todd Fritze
Submitted On
1/13/2015 9:15:08 AM
Affiliation

I would encourage the Board to **pass** proposal **#56**.

Currently we are allowed to shoot two beaver a day in the spring time however during that same time frame a person can trap as many beaver in a day as they care to. The beaver that a trapper takes he can eat, use as bait for other furbearers, or even make more income off of by selling to dog mushers. If a beaver is shot it must be consumed, no more additional income opportunities exist after the sale of the hide on a shot beaver. Essentially this cost beaver trappers who may shoot a couple beaver potential income. Loss of beaver when shooting is very minimal and it seems almost unenforacable to make sure that these beaver are consumed. It also seems like a conflict that a person can harvest an unlimited amount of beaver with a trap in a day but can only harvets 2 with a firearm.

It is not uncommon to find beaver in unit 17 that are starving in the late winter months that have chewed out of their houses and gone looking for food. Currently if a person sees these beaver their only option is to set a trap and return daily in an attempt to take these beaver. By not returning everyday if a beaver is caught it most likely will be eaten by predators by the time a trapper returns, which is a waste of the resource and has cost the trapper money in fuel and time. It would be much more efficient and productive if the trapper could stop and harvest those beaver immediately with a firearm. However eating these beaver would not be something most would want to do as they are pretty much starved to the point that they are nothing but bones. If a trapper could use this beaver as bait to catch other furbearers or sell it to dog mushers it will additionally add income to his or her household.

There currently is no shortage of beaver in unit 17 harvest is very low and in many parts of the unit they are overabundant.

In the few areas of unit 17 where there is more of a population base and trapping is heavier beaver are still easily found. These beaver seem to steadily fill back into places allowing trappers to take from the same areas yearly and obtain the beaver they want.

Proposal #55, was discussed extensively in the regional advisory committee meeting although I would prefer #55 or #56 to be passed as written I would be in support of the amendments made to #55 by the advisory committee

I support proposal #55 and #56 as written and can support the changes to #55 brought up in the advisory meeting.
I oppose proposal #57 and can not nor wish to support it in any manner
(via email correction)



From: K.M. Gordon
Sent: Monday, January 19, 2015 11:48 AM
To: Tibbles, Kristy R (DFG)
Subject: Alaska Sheep Management Plans in Digital Form

Dear Ms. Tibbles...

I want to be sure the Board Members have copies of the current Sheep Management Plans for their upcoming deliberations.

Thanks very much.

Karen Gordon
Fairbanks

THE PLANS, THE DEPARTMENT OF FISH AND GAME AND THE PUBLIC

Alaska's Wildlife Management Plans are the result of a long-term planning effort which first resulted in the development of the Alaska Game Management Policies in 1973. These plans are another step toward developing a program for wise husbandry of Alaska's wildlife resources and, basically, are recommendations to the public by the Department of Fish and Game for the management of all wildlife in the state.

The information and recommendations contained in these plans represent a concerted effort by Department staff to compile and review existing information on the status, distribution, and uses of Alaskan wildlife populations. Current and projected land use patterns and natural resource potentials and developments are also considered. Synthesis of these plans began at the field level where local needs and conditions were best understood.

The need for planning in the management of wildlife, and particularly in the allocation of use of wildlife, has become pressing in recent years. Alaska is experiencing unprecedented growth in human population at the same time that immense land areas, conveyed to private ownership or federal single-purpose classification, may be lost to multipurpose public use. Development and mobilization of resources are impacting wildlife and its habitat and are bringing more people into contact with once-remote wildlife populations. In simplest terms, Alaska faces a rapidly growing demand for wildlife use which is in sharp contrast to the shrinking resource area available to support such use. Moreover, as pressures on wildlife populations increase, there are increasing possibilities that any given use will have detrimental effects. There is, therefore, need for greater precision in management.

The complexity of resource allocations requires the systematic approach provided by planning. In keeping with mandates of Alaska's constitution, the Department's planning efforts are intended to eventually achieve optimum, diversified use of Alaska's wildlife throughout the foreseeable future.

Publication and distribution of these recommendations mark the beginning of the second phase in this planning process: the public's review of the staff's recommendations and its involvement and participation in shaping the initial proposal into a statement of direction for wildlife management in Alaska.

The responsibility of the Department is to manage Alaska's wildlife resources for the benefit of the people. Therefore, it is incumbent on the Department to determine what the public wants from its wildlife resources. It is clear also that the Department will not be able to maintain the continuity of long-term management programs without the support of Alaska's people.

Development and implementation of the wildlife plans will affect Alaskans in several ways. First, the public will participate in the initial formulation of the basic long-term management direction. Second, the plans as presented for review will inform the public about Alaska's wildlife populations and their current and potential uses. They will also give the public a clearer understanding of the role and responsibilities of the Department of Fish and Game. Third, if implemented, the plans will provide Alaskans and other interested persons with an array of alternative uses of wildlife which can be maintained through purposeful management.



All interested people are invited to contribute to the wildlife management planning effort. The Division of Game recommendations contained in this and other booklets and maps are being distributed to the public throughout the state. Included is a questionnaire soliciting opinions about the management the Division is proposing. In addition to printed circulation of the proposed plans, the Division will hold public meetings in many Alaskan communities to obtain comment and discussion.

All public response will be considered in evaluating and modifying the proposed plans. Allocation of wildlife values among competing users and between conflicting uses is a complex problem which will have to be resolved through careful consideration of expressed public desires and the biological capabilities of the wildlife populations in question. Minority as well as majority demands should be accommodated if we are to retain the values afforded by a spectrum of wildlife-oriented experiences.

The Division will work closely with the Alaska Board of Game and with the Board's local advisory committees during the entire public review process. As the principal forum for the public's voice in Alaska's wildlife management, the Alaska Board of Game will modify and make the final determination on proposed wildlife plans. The Division of Game will assist the Board by providing a full report of the public review process and the response it engenders.

After the public review process, and revision and adoption by the Board of Game, the plans will be published and distributed to the public. Needless to say, the plans are not intended to be inflexible. Conditions change with time, and the plans will need to be adaptable. Revision of plans may occur as the result of periodic reviews or when individual situations require modification. Revision of plans will be made with participation by the public.

Implementation of the plans will begin as soon as practical after final acceptance by the Board of Game. Those areas or species now receiving the greatest use or in danger of losing those attributes called for by the plans should receive the earliest attention. Implementation will involve development of operational plans, formulation of regulations, internal Department actions such as research and management activities, and interagency cooperative actions as required.

Development and implementation of these management plans will be strongly affected by conveyance of 40 million acres of land into private ownership and by inclusion of up to 80 million acres of classified federal withdrawals into "Four Systems" federal management under terms of the Alaska Native Claims Settlement Act. Development of staff recommendations has proceeded with the knowledge that many changes in the contents of the final plans are inevitable. Management of wildlife on lands under federal jurisdiction or under private ownership will necessarily be commensurate with the land-use policies of the respective landowners. Important land-use decisions are being made now and in the next few years that will affect wildlife and its future use in the state. By developing wildlife plans now, we can improve the rationale by which land-use policies will be formulated.

WHAT THE PLANS CONTAIN

This regional booklet is only one portion of a comprehensive public proposal by the Division of Game, Department of Fish and Game, for the planned management of Alaska's wildlife resources. The proposal consists of: 1) seven regional booklets (of which this is one) containing recommendations for management of each species of wildlife, and 2) a set of eleven statewide maps outlining boundaries of individual species

management plan areas. The maps are intended to complement the material presented in the regional booklets. For complete understanding of the plans, the maps and appropriate regional booklets should be used together. These plans are for your review. Questionnaires have been included with the maps and booklets for your written comments. In addition, public meetings will be held throughout the state to explain plans and receive comment. You are invited to contact the Game Division staff to discuss these plans.

REGIONAL BOOKLETS

Each regional booklet is arranged in two parts. Part I contains an explanation of the planning effort and how the public will participate in the development of the plans. Included is an explanation of the management goals upon which the recommendations are structured. In addition, Part I presents a brief discussion of wildlife management in Alaska, reviewing the formal structure of management, the biological bases for wildlife use, and the problems encountered in managing wildlife. Part II contains the individual species/area management recommendations.

Each of the regional booklets corresponds to one of seven geographic regions of the state, depicted in the figure below.





All proposed management plans covering all or part of a region are included in the booklet for that region. The plans are arranged by species in Part II of each booklet, and each plan is titled and numbered to provide easy reference to the corresponding species map. Each individual plan includes:

- 1) A geographical description of the location of the area covered by the plan.
- 2) Goals - One primary goal and in some cases one or more secondary goals.
- 3) Examples of Management Guidelines - These are used to qualify or quantify in a more specific way the recommended management under a goal for any particular area.

Management Guidelines are statements about:

- the wildlife population: its size, sex and age structure and productivity.
 - use: season lengths and timing, bag limits, number or distribution of hunters or other users, access, transport, viewing, and aesthetic enjoyment.
 - habitat: alteration or protection.
- 4) A short summary of available information on the species and its use in the area to provide perspective for evaluation of the proposed management framework.
 - 5) Statements of problems that may be encountered in managing for proposed goals. In general, problems deal with:
 - maintaining wildlife population levels: loss of animals or loss of habitat.
 - use of wildlife: exclusion of hunting, excessive access, noncompliance with regulations, state and federal legislation, and limitations on Department authority.
 - conflicts caused by wildlife: agricultural depredations, and safety of life and property.
 - 6) A summary of the impacts of the proposed management in terms of its effects on the species in question, on characteristics of its use by man, on other species, and on other uses of the area.



MANAGEMENT BACKGROUND

To properly evaluate the individual species plans presented in this volume, it is necessary to have some appreciation for the Alaska setting in which these plans are developed. There are, of course, biological or ecological characteristics of wildlife which affect its management. There are also a number of human institutions that affect management: constitutional and statutory authority, requirements, and constraints; policy; user requirements; and the demands of the "new Alaska." It is hoped that the following discussion touching on these considerations helps to place the plans in a more relevant perspective for public understanding.

THE LEGAL BASIS FOR WILDLIFE MANAGEMENT IN ALASKA

Wildlife management in Alaska was formally established in 1925 when Congress created the Alaska Game Commission "to protect game animals, land furbearing animals, and birds in Alaska, and for other purposes." Prior to 1925 protection of wildlife had been undertaken by the Departments of Treasury, Commerce, and Agriculture, and by the territorial governor.

The five-member Alaska Game Commission, appointed by the governor, represented each of four Judicial Divisions of the state and the U. S. Bureau of Biological Survey, later to become the U. S. Fish and Wildlife Service. This commission set hunting seasons and bag limits subject to approval by the Secretary of Interior. Emphasis of management was on establishment of wildlife refuges and on enforcement and predator control activities until the 1950's when research of game populations was increased.

With the attainment of statehood in 1959 a formal framework for State management of Alaska's wildlife resources was established. In addressing natural resources, Article VIII of the Constitution of the State of Alaska states:

Section 1. Statement of Policy. It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.

Section 2. General Authority. The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.

Section 3. Common Use. Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

Section 4. Sustained Yield. Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

In accordance with these mandates, the Alaska Legislature established by statute a Department of Fish and Game, provided for a Commissioner as the principal executive officer of the Department, and created a Board of Fish and Game. The Division of Game was one of several divisions created to carry out the responsibilities of the Department.

Since statehood the role of the Legislature and the functions, structure, and interrelationships of the Board of Fish and Game, its advisory committees, and the Department have undergone changes in response to

public concerns over increased use of wildlife, increased conflicts between users, growing public involvement in government and increased public environmental concern.

Legislature

The Legislature, by virtue of its broad constitutional authority, has been a dominant force in establishing the character and direction of Alaska's management of wildlife. At statehood the Legislature enacted the Fish and Game Code of Alaska (Title 16) which established the Commissioner and Department of Fish and Game and a Board of Fish and Game, and defined the powers, duties and functions of each. In addition, this act, or amendments and additions to it, provided for: the authority to enforce laws and regulations; licensing of hunting and trapping, including specification of licenses and tags required and their fees; protection of fish and game from human activities; establishment of state game refuges and sanctuaries, and designation of critical habitat areas; suppression of and bounties for predatory animals; commercial use of fish and game; and the specification of unlawful acts, violations, and penalties therefor. Among the powers specifically reserved to the Legislature were those of regulatory and administrative legislative review, approval of areas set apart as fish and game reserves, refuges, and sanctuaries by the Board, the authority to change the amount of fees or licenses, and budgetary controls. This legislation, in essence, formed the basic framework for the entire scope of activities carried on by the Department and the Board.

Since statehood, the Legislature has variously added to, amended or repealed portions of the original State fish and game statutes, reflecting increased complexities of resource management, and increased demands on the Legislature by the people. In general, revisions of the statutes have served to clarify or expand legislative intent and to increase provisions for management, protection, regulation and use of wildlife. Although many of the revisions have affected the scope of activities of the Commissioner, the Department, and the Board, most have had little substantive effect on the interrelationships between these principals. Some recent state legislation however, has affected the traditional structure of Commissioner and Board authorities. The general effect of these recent legislative actions has been a diminution of Commissioner and Board authorities in favor of increased parochial advisory committee roles and increased public participation. Included in such acts are those relating to:

- Boards of Fisheries and Game. This 1975 act restructured the 12 member Board of Fish and Game into two, 7-member boards, one for fisheries and one for game; repealed the status of the Commissioner of Fish and Game as an ex-officio member of the Board; redefined the regulatory powers of the Boards; amended the provision establishing advisory committees to concurrently expand advisory committee authority to close seasons and limit the Commissioner's authority to overrule closures established by advisory committees.
- Taking of antlerless moose. This 1975 act expanded the authority of advisory committees and the Department while limiting the regulatory authority of the Board of Game by prohibiting the taking of antlerless moose except under regulations adopted by the Board after requisite recommendations for open seasons are made by the Department and by a majority of active local advisory committees for the game management unit or units affected.

Although it is important to recognize that the Legislature has delegated broad regulatory authority to the Board of Game, it is also important to



understand that the Legislature has the authority to affect that delegation at any time. For example, seasons and bag limits, normally set by the Board, could legally be established by the Legislature. However, the Legislature has generally restricted its activities to more general and enabling legislation.

Governor

The Governor, as chief executive of the State, is responsible for the conduct of the Department of Fish and Game in serving the people of Alaska. All actions of the Department are subject to review and concurrence by the Governor. In addition, the Governor may invoke independent executive actions. Under his strong constitutional authority, the Governor has brought about major reorganization of the Department in the past. In 1962 most of the functions and powers of the Department relative to the collection, accountability, and custody of fish and game revenues was transferred to the Department of Revenue by executive order. Similarly, the Division of Protection, with primary responsibility for enforcement of all fish and game laws and regulations for the Department, was transferred to the Department of Public Safety in 1972.

Commissioner of the Department of Fish and Game

The Commissioner is the principal executive officer of the Department of Fish and Game. He is appointed by the Governor for a term of 5 years, subject to confirmation by the Legislature, and serves at the pleasure of the Governor. The Commissioner functions to "manage, protect, maintain, improve, and extend the fish, game and aquatic plant resources of the state in the interest of the economy and general well-being of the state" (AS 16.05.020). To that end, he supervises and controls the Department, including appointments of personnel and assistants necessary for the general administration of the Department and he may delegate his authority to subordinate officers.

Among the powers and duties of the Commissioner are administrative, budgeting and fiscal powers; the collection, classification and dissemination of statistics, data and information; the emergency opening or closure of seasons or areas; and the capture, propagation, transport, purchase, sale, or exchange of fish or game or eggs for scientific or stocking purposes.

In addition to that authority specifically provided to the Commissioner by statute, the Board may delegate to the Commissioner authority to make regulations. However, such delegation in the past has been limited and specific in nature.

Division of Game

The Division of Game was established in 1959 under provisions of the act creating the Department of Fish and Game. As one of several divisions of the Department, the Division of Game functions in meeting the legislative charge to the Commissioner to "manage, protect, maintain, improve and extend the.....game.....resources of the state....." as well as in providing such assistance to the Board of Game as it requires in the performance of its functions. In each of these areas, the Division attempts to maintain a public posture by disseminating information and encouraging public involvement in the management of Alaska's wildlife.

The Division of Game conducts many activities to meet its responsibilities including:

- * Assessment of game population status involving biological

- * Identification and protection of important wildlife habitats. The Division provides information and recommendations to federal, state and local agencies which plan for, manage, regulate, or otherwise affect lands in Alaska or their use, to minimize detrimental impacts of land and water uses upon wildlife habitat in Alaska.
- * Preparation of reports on the status, management and use of Alaska's wildlife resources, for public information, scientific publication and use, and to provide the Board of Game with information it requires to promulgate regulations.
- * Recommending appropriate regulations for consideration by the Board of Game.
- * Enforcement of regulations. Although primary responsibility for enforcement of fish and game regulations falls to the Division of Wildlife Protection in the Department of Public Safety, Game Biologists are authorized as enforcement officers and maintain an active profile in the enforcement of regulations.
- * Providing the public with information, assistance and other services. The Division disseminates reports of Division activities to the public, contributes to Departmental information and education activities including television and radio programs, a Fish and Game magazine and newspaper articles, distributes regulation pamphlets to the public, and provides personal assistance and explanation on an individual inquiry basis.

At present, the Division of Game is staffed with approximately 110 full-time positions. About 75 positions are filled by professional biologists, all of whom possess at least a Bachelor's degree in wildlife management or other biological sciences. Many possess Master's degrees or higher. The remainder comprise the support staff of clerical, technical, and statistical positions. In addition to the Division headquarters in Juneau, regional offices are maintained in Fairbanks, Anchorage and Juneau. A total of 21 area field offices are maintained in major communities throughout the state.

Activities of the Division of Game are largely funded by a federal-state matching funds arrangement, made possible through a "Fish and Game Fund" and the Federal Aid in Wildlife Restoration Act of 1937.

Under the Federal Aid in Wildlife Restoration Act and its amendments, funds from an excise tax on sporting arms and ammunition, including pistols, revolvers, bows and arrows, and parts and accessories are made available to the various states on a matching basis for use in wildlife restoration work, including land acquisition, research, development and management projects, and for use in hunter safety programs. Monies are made available on a maximum share basis of 3 federal to 1 state dollar basis. Provisions in the act require the various participating states to maintain funds obligated to fish and wildlife restoration work as defined by the act.

The Alaska Legislature established the Fish and Game Fund at the same time the Department was established. Most of the money comprising the Fish and Game Fund derives from the sale of state sport fishing and hunting licenses and special permits, although funds from other sources are possible. Funds gained from license sales or permit fees cannot be used for other than the protection, propagation, investigation and restoration of sport fish and game resources and the expenses of administering the Sport Fish and Game Divisions of the Department.



Board of Game

The Board of Game, as presently constituted, was established in 1975. Originally established in 1959 as an eight-member Board of Fish and Game, the Board was subsequently enlarged by statute to 10 and then 12 members before being divided into two Boards, one for fisheries and one for game. The Board of Game now has seven members, appointed by the Governor and subject to confirmation by the Legislature. The staggered term of office for members is four years. Members serve at the pleasure of the Governor.

The primary functions of the Board of Game in conserving and developing the game resources of the state are the promulgation of regulations affecting use of wildlife and the establishment and conduct of advisory committees.

The Board of Game is empowered to make regulations for:

- (1) setting apart game reserve areas, refuges and sanctuaries in the waters or on the lands of the state over which it has jurisdiction, subject to the approval of the Legislature;
- (2) establishment of open and closed seasons and areas for the taking of game;
- (3) establishment of the means and methods employed in the pursuit, capture and transport of game;
- (4) setting quotas and bag limits on the taking of game;
- (5) classifying game as game birds, song birds, big game animals, furbearing animals, predators or other categories;
- (6) investigating and determining the extent and effect of predation and competition among game in the state, exercising control measures considered necessary to the resources of the state and designating game management units or parts of game management units in which bounties for predatory animals shall be paid;
- (7) engaging in biological research, watershed and habitat improvement, and game management, protection, propagation and stocking;
- (8) entering into cooperative agreements with educational institutions and state, federal, or other agencies to promote game research, management, education, and information and to train men for game management;
- (9) prohibiting the live capture, possession, transport, or release of native or exotic game or their eggs; and
- (10) 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. (AS 16.05.255)

In addition, the Board of Game may adopt regulations upon the recommendation of the Department, by the majority vote of affected local advisory committees, or by written petition by interested residents of an area as regards the establishment of subsistence hunting areas, the control of transportation methods and means within subsistence hunting areas, and the establishment of open and closed seasons and areas to protect subsistence hunting. (AS 16.05.257)

Promulgation of regulations by the Board must be in accordance with Alaska's Administrative Procedure Act (AS 44.62) which requires among

other things that:

1. Meetings of the Board be open to the public and that reasonable public notice be given for such meetings.
2. A procedure be used for adopting regulations which includes:
 - a. prior public notification of proposed actions,
 - b. opportunity for any interested person to present statements, arguments, or contentions in reference to a proposed action, and,
 - c. opportunity for an interested person to petition the Board for the adoption, amendment, or repeal of a regulation.
3. Regulations be codified and published.

The Boards of Fisheries and Game are empowered to establish advisory committees in various parts of the state for the purpose of providing the Boards with recommendations on fish and game in their areas of jurisdiction. The Boards set the number and terms of the members of advisory committees, delegate one member of each committee as chairman and give him authority to hold public hearings on fish or game matters. Advisory committees have the authority to declare emergency closures during established seasons under procedures established by the Board. Furthermore, advisory committees must recommend openings of antlerless moose seasons in their respective areas, in conjunction with Department recommendations for open seasons, before the Board of Game may adopt regulations for the taking of antlerless moose.

The Board of Game meets at least once each year, but may meet more often as it considers necessary. Special Board meetings may be called at any time by the Commissioner or at the request of two Board members.

Public

Alaska's people are the ultimate managers of their wildlife resources. Through the electoral process and other mechanisms of government responsiveness, the public can and does effect the management of wildlife in Alaska.

Wildlife management in Alaska is an exceptionally public process. Aside from the economic interest in resource utilization, few other resources elicit public attention to the extent that fish and wildlife do because an intimate association with wildlife has been an important part of the Alaskan lifestyle. There is a traditional sense of personal ownership of wildlife that doesn't exist to the same degree with other natural resources. Other contributing factors are the increasing importance of outdoor recreational activities and the widespread public association with "ecological awareness."

Alaska's constitution reserves the state's wildlife to the people for common use consistent with the public interest. In order to assume an active and productive role in the management and use of wildlife, the public must be cognizant of the responsibilities demanded by such a role. The public has a responsibility to be informed about the status of wildlife resources and the options for their use. The public should also be informed about the governmental management framework - which agencies are involved, what their responsibilities are, how their functions and authority are interrelated, and what legal, budgetary, and administrative constraints limit their actions. Citizens should be aware of the opportunities to express their concerns as provided by statute, directive and policy: the legislative stage, the public forum provided by the Board of Game, public hearings and meetings, petitions,



and personal contact. The public should participate in the regulatory process and should actively support current regulations. Finally, all wildlife users should bear their share of costs of conservation. Although many people who do not hunt or fish derive substantial benefits from fish and wildlife, in Alaska almost all costs of wildlife management by the Department of Fish and Game are borne not by the general public, but by those individuals who purchase hunting and fishing licenses, guns and ammunition, and fishing tackle.

BIOLOGICAL CONSIDERATIONS

Wildlife Habitat

The dependency of wildlife on its habitat is of fundamental importance, yet many people are unaware of the relationships involved. Habitat is a combination of many interrelated factors which provide living space for a species. Food and cover are general terms for basic necessities that are often complicated and variable according to season and circumstance. Suitable and often different areas are needed for breeding, nesting, rearing young, resting, escaping and feeding. Not only must all these essential components be present in a habitat to make it "habitable" for a species, but they must be accessible to the animals. Some migratory birds satisfy their habitat needs by depending on habitat components over the breadth of two continents while some small mammals live their entire lives in the space of a backyard. But the "backyard" must have the necessary variety of areas to be good habitat. For many species, the more "edge effect" created by interspersed vegetative types, the better the habitat. The suitability of a habitat is the first concern in any effort to establish, maintain, or enhance populations of a species.

There is a limit to the number of animals supported by a unit of habitat, and this limit varies from season to season and from year to year as the adequacy of the essential habitat factors vary. When expressed as an average density of animals that can be supported this limit is called the carrying capacity. When carrying capacity is exceeded by a population, habitat can be damaged, and the result is often a reduction in the carrying capacity followed by a decline in the wildlife population.

A species usually relies on more than one specific habitat area or factor for the essentials of life. The area or factor in shortest supply determines the maximum number of animals that a habitat can support. This is known as a limiting factor. If food is the limiting factor, and the supply is increased, the carrying capacity for that species will increase until it becomes limited by the shortage of another factor, such as a place to escape from predators. Specific habitat areas of great importance to a wildlife population are called critical areas or critical habitat. Such areas are critical because they are limiting, and their loss or reduction would result in elimination or reduction of the population.

Habitat changes are continuously occurring naturally. Vegetation associations succeed one another as each successional stage, through its occupancy, makes conditions more favorable for its successor until a climax vegetation stage is established. Climax communities remain in tenuous balance with the long-term forces of climate and geological change. There are reversals in the process as well, and these normally are sudden and drastic in comparison to the subtle progress of succession. Fire is perhaps the most spectacular, but there are many others, such as deposition of material by rivers and glaciers, effects of windstorms, insect infestations, and man-made clearings. Wildlife populations change in response to changes in habitat, as it becomes more or less



favorable for the species.

Manipulation of habitat (including protection when necessary) is therefore a prime tool in managing for desired populations of wildlife. With the proper techniques the successional stages most favorable to a species can be maintained on a long-term basis, variety of desired vegetation can be improved beyond natural occurrence, and special habitat necessities can sometimes be artificially provided. Response of wildlife to habitat improvements can be dramatic.

Some qualifications on the benefits of habitat improvement should be noted. Habitat improvement programs are directed at increasing or maintaining numbers of desired wildlife populations. Since a habitat favorable for some species may be less favorable for others, manipulation of habitat will mean reductions of some species populations as well as gains to others. Also, manipulation of habitat does not always result in increases of wildlife because the effectiveness of habitat improvements may be limited by the influence of uncontrolled factors such as climate and soil quality. There also are a number of species which are dependent upon climax vegetation associations. Because their populations cannot be benefitted through short-term vegetation changes management must be directed to other factors which are alterable.

Population dynamics

Maintenance of populations at carrying capacity, however useful as a management concept, is rarely achieved under natural, unmanaged conditions. How many individuals of a species there actually are in an area at any time is a result of the interplay of the population with the allowance of its living area. Wildlife is often "out of phase" with its habitat in a never-ending see-saw of adjustments to the excesses and shortages of its environment. The processes of adjustment by which a population's size is balanced with its habitat are termed population dynamics. Essentially, these are the opposing forces of reproduction and mortality.

Reproduction is the main way new individuals are recruited into a population (migration may add animals, too). The increase of a population, excluding the effects of movement or mortality, is limited by the reproductive potential of that species. The number of young each female can produce in a year, the minimum and maximum ages at which breeding may occur, the sex ratio of breeding adults, and longevity of individuals, all together determine the maximum rate of increase that a population may exhibit. Wildlife populations, however, rarely increase at their maximum rate. Mortality is the main reason, of course, but other factors may depress reproductive success. For example, not all females capable of breeding find males; or younger animals capable of breeding may be inhibited in attempting to breed because of dominance exerted by older individuals; and many species give birth to fewer young in times of adversity. Such depressants on reproduction are commonly self-regulating mechanisms, through which animals respond to conditions of overcrowding, food shortages, or poor nutrition.

Mortality operates against population growth by removing animals. Starvation, predation, hunting, inclement weather, diseases and parasites, accidents, and strife between animals all contribute to losses of wildlife. The relative importance of any one factor is generally dependent on two things: the effects of other mortality factors, and the density of the population. Animals injured by accident or strife may have difficulty obtaining food and may starve. Others, weakened by starvation or debilitated by disease, may fall easy prey to predators. In the absence of predation and hunting, populations can outgrow their food supply and starvation will be the major cause of mortality. Some factors, such as predation, starvation, and disease, increase in their importance as the density of the population rises and these are known as density-dependent mortality



factors. Success of predators increases as their prey becomes more abundant. Starvation is more common as competition for food increases. Transmission of disease is facilitated by crowding of animals. The reverse situation is also true. As a population is reduced, relatively fewer losses occur to these factors. Also, greater losses to one cause will result in reduced losses due to other factors. To some extent, change in one kind of loss is compensated for by change in another kind of loss.

These direct and indirect compensatory relationships between reproductive performance, various mortality factors, and population density make it possible to some extent for human use of wildlife to replace other kinds of mortality.

Losses to wildlife populations are replaced by reproduction. If everything is working right and habitat quality is reasonably good, animals characteristically produce more young than are needed for replacement. This creates a "surplus" of individuals, both young and old, that is trimmed off by the various mortality factors. The surplus may be small if the new individuals are accommodated by excellent habitat, or it may be large as the population exceeds the capacity of the habitat. Wildlife management seeks to take advantage of compensatory relationships to make some of the surplus available for human use.

Removal of animals lowers population density. Fewer animals are then lost to density-dependent mortality factors. Lowered density results in reduced competition for food, which in turn increases survival of young, for it is the young (and the very old) which suffer the greatest losses to starvation. Within limits, increasing the removal of adult animals continues to boost the survival of young. Furthermore, lower population density makes more food available, more animals breed successfully as a result of being in good physical condition, and more young are produced and raised by each female.

The productivity of a species in terms of its use by humans is called "yield." Normally, yield applies to consumptive use, but it can also include so-called "nonconsumptive" use as well. Management of wildlife is aimed at producing a sustained yield, that is, utilizing a wildlife population at such a level that the capability of the population to continue to provide such use is not impaired. Sustained yield is the central concept in the management of any renewable resource.

There is usually a range in intensity of use that wildlife populations will sustain, from no use to that which is the maximum allowable. Human use is another force acting on a population, affecting, and in turn being affected by, the compensatory relationships of the various natural reproductive and mortality factors. Consequently, a wildlife population will establish an equilibrium with the forces acting upon it, as long as the minimal species requirements are met.

PROBLEMS OF MANAGEMENT

Management of wildlife has its share of problems. Although many problems can be foreseen and avoided by giving careful thought to the future, dealing with wildlife and with people is full of surprises and the wildlife manager must be "ready for anything."

The difficulties faced by wild animals in their daily lives become part of the problems faced by wildlife managers. Many of the crucial problems faced by wildlife in obtaining enough good food, having a chance to reproduce, and avoiding an untimely death are known. Many remain nature's secrets. A large part of the wildlife manager's job consists of learning to recognize these crucial problems, and trying to either minimize or make allowance for them.



part of the manager's job involves regulating man's use of wildlife and its habitat. There are two broad problem areas involved. The most difficult is attempting to insure that use and development of resources other than wildlife cause the least difficulties for wildlife and its habitat. The second broad problem area involves developing a system of wildlife use that enriches the lives of the public in various ways without impairing the welfare of wildlife species, their habitat, or their relations with other species. The latter problem is the wildlifer's "first love," but more often than not he's "married" to the former!

Taken together, these two broad problem areas include a whole spectrum of potential difficulties for wildlife, wildlife managers, and the public who wishes to enjoy wildlife. Problems range in importance from critical to mere nuisances, depending on their nature, location, duration, season and magnitude. The most important problem affecting the well-being of wildlife in Alaska and indeed, in most parts of the world, is loss of suitable living space, or habitat. Alaska is fortunate in that the wildlife habitat that has been lost or significantly damaged is small at this time, but the trend toward increasing losses is clear.

Many other problems exist, and the following review may give readers a feeling for the variety and importance of problems encountered in wildlife management. For convenience, problems are grouped according to these circumstances: natural factors, land use, use of wildlife, and management limitations.

Natural Factors

Loss of habitat occurs through nature's processes, sometimes suddenly but more often slowly enough for animals to adjust. Given time, meadows may become brushlands, and brushlands become forests. For example, the great 1947 Kenai burn, a huge wildfire on the Kenai Peninsula, allowed thousands of acres of young willow, aspen and birch to replace mature forests with prime food, and stimulated a boom in moose numbers. But after 30 years the prime food plants have grown out of reach or have been eaten up; the prime moose habitat is gradually being lost, and the number of moose the area can support has declined. Similar situations have occurred throughout much of Southcentral and Interior Alaska, as modern, efficient fire suppression techniques have reduced the frequency and extent of burning. On the other hand, natural and man-caused fires have affected wildlife populations, such as caribou, red squirrels, and spruce grouse, that are dependent on long-established (climax) vegetation.

There are other examples: ponds or sloughs used by beavers may gradually fill in with silt and dead plant remains, and either become too shallow or develop a wide "beach" of sedges and grasses that makes food gathering a dangerous proposition, and the beavers quit using the ponds.

Sometimes the animals cause their own problem. The Nelchina caribou herd grew so large that it decreased its own food supply by eating and trampling more than the plants could produce. An important part of the caribou habitat was lost, and will not recover for many years. But, to repeat, these are all examples of relatively long-term changes, and while great changes may occur in numbers of the species affected, the change each year may be moderate.

In a few cases, change may be rapid and catastrophic. A much earlier fire on the Kenai Peninsula apparently destroyed the caribou habitat then available. Caribou disappeared from the Kenai, and did not return until transplanted by man 60 to 70 years later. The 1912 eruption of Katmai was a catastrophe that quickly eliminated much wildlife habitat on the Alaska Peninsula, and the 1964 earthquake caused the ocean floor to rise several feet in some areas of southcentral Alaska, dramatically



affecting all marine life, including marine mammals and waterfowl.

Another major, natural limiting factor, or problem, for wildlife is weather. Alaska's climate is often harsh and there are numerous examples of the limiting effects of weather on wildlife. In the winters of 1971, 1972 and 1974 unusually cold weather caused sea ice in the Bering Sea to extend hundreds of miles south of its usual limit; sea otters were trapped, unable to feed and float as they normally do, and many died. Winters of prolonged, unusually deep snow have caused major die-offs of moose at Yakutat, and in Southcentral and Interior Alaska. In some cases 50 percent or more of the moose may have died, mainly because it became too difficult to get around in search of food.

Hard snow crusts formed by unusual winter rain have caused grouse to die from freezing, because the birds were unable to burrow in the snow at night to sleep. Similar crusts caused by the bright spring sun have at times aided wolves in pursuit of moose. In some years, frozen or wind-blown snow crusts may prevent caribou from feeding on parts of their winter range; crusts or deep snow may affect sheep similarly.

Mid-winter flooding or unusually great depths of overflow ice have driven beavers from their houses, much to the benefit of passing wolves or wolverines which find beavers easy prey on land. Severe spring floods may drown beaver kits, calf moose, and other young-of-the-year. Of course, the effect of any of these events depends on their severity, how long they last, and whether or not they strike an especially vulnerable spot in the species' annual cycle of living.

There may be times when weather is so severe that animals (especially young ones) die outright from exposure, but usually, as in the examples above, bad weather makes it so hard for animals to use some critical part of their habitat that they die from starvation, with a little extra "push" from a combination of various lesser factors such as disease or parasites, predators, and accidents.

Food supply, or nutrition, is a crucial factor not only during hard winters, but at other times as well. Ample food of good quality is especially important to pregnant and nursing females, whose food needs are greatly increased. A lack of proper food may result in weak offspring which may be susceptible to disease, or be caught by a predator. Some young may not even be born, or may be born dead. In fact, if the female has been undernourished prior to breeding season, she may not conceive when she mates, or perhaps she will have fewer offspring than normal.

Moose, deer, and caribou depend on "fattening-up" during the summer in preparation for a rugged rutting season and a long winter. Males lose most of their fat during the rut, and are actually in only fair condition when winter comes. If winter weather is particularly severe, or winter food is scarce, males are more likely to die than females. Calves and very old animals are even more susceptible.

As more is learned about wildlife nutrition, it becomes evident that food quality is as important as quantity. Some species of food plants are more nutritious than others, some parts of plants are more nutritious than other parts, and in general younger plants are more nutritious than older plants. A bunch of brush is not necessarily a bunch of good wildlife food!

Predation. If the moose, caribou, sheep, grouse or other species have managed to survive all the other natural hazards of life so far discussed, there is no time to be smug, because there may be a bear, wolf, weasel, hawk or some other predator looking for its next meal! When prey species (those normally eaten by another species) are at low numbers, in poor condition, or have trouble escaping because of deep snow or lack of



suitable habitat, predators can eat enough prey to reduce or hold down numbers of their prey. The effects may be short-term, or they may extend over several decades, depending on the species involved and the circumstances. There usually is little doubt that prey numbers will eventually recover, but in the meantime few of the prey species may be available for the remaining predators, scavengers, or for various uses by people. For example, in recent years, severe winter weather has been an important cause of declining moose numbers in Interior Alaska. In the Tanana Flats, near Fairbanks, hunting and predation contributed to this decline. Hunting has been almost completely eliminated to encourage the recovery of the moose population, but so far no recovery is in sight. Wolves have been one of the major factors preventing moose numbers from rapidly recovering, and in the Tanana Flats, their depredations may accelerate and deepen the moose decline to very low numbers. The situation prompted wolf control programs in an effort to allow moose to recover more rapidly. Predators are rarely the sole reason for declines of wildlife populations, but under certain circumstances they can be a primary cause for depression of prey numbers.

There are additional natural hazards for wildlife. Accidents and disease sometimes kill wildlife, but often these hazards are either caused or promoted by other hazards. For example, a hard winter or late break-up may cause more accidents, because animals are in poor condition and more accident-prone.

In summary, a variety of natural mortality factors affect wildlife populations; these factors usually are interrelated, and their impact varies from negligible to considerable. Wildlife managers must know what these factors, or problems, are, and either devise ways of reducing them, or tailor management to allow for effects of these hazards.

Land Use

Land ownership was pretty simple before Alaska became a state. There were a few military reservations, and a large petroleum reserve. A handful of large National Parks, Monuments and extensive Wildlife Refuges existed, plus large National Forest holdings in Southeastern Alaska and smaller ones in Southcentral Alaska. Most of Alaska, though, was public domain, uncommitted to any special uses.

Times changed, the State of Alaska was given the right to select 104 million acres as part of its dowry from the federal government, and before long the question of Alaska Native Land Claims arose. In 1971 the Alaska Native Claims Settlement Act gave Alaskan Natives the right to select approximately 40 million acres of land in Alaska, and also provided for inclusion of up to 80 million acres in National Parks, Refuges, Forests and Wild and Scenic Rivers. Native selections were recently completed and are awaiting certification. Various proposals have been made for how the 80 million acres, called "d2" lands, should be assigned to the government agencies involved, and Congress has to make the final decisions by December 1978.

However those final decisions turn out, lands in Alaska will be in a crazy-quilt pattern of private, state, and (several) federal agency ownerships. The rights, regulations and rules of the various owners will make resource use of all kinds much more complex, and generally more restrictive than ever before. For wildlife management to contribute effectively to the well-being of wildlife species, and to provide for continued use of wildlife in various ways, some major problems must be addressed.

Perhaps the most basic problem is that even as demands for use of wildlife increase, the amount of land available for public use will decline, simply because the amount of land in private ownership will increase.



Land granted to native groups will be private land. Like any landowner, native groups will place their own interests first, and the lands granted to them are their main resource in becoming economically self-sufficient. Self-sufficiency may be based on resource development, subsistence use, or both, but whatever combination develops, public access to wildlife on those lands will no longer be a right, and opportunities to use wildlife will decrease.

Some state-owned lands may go into private control, too, through sale or lease. This would also decrease opportunity for public access to wildlife. By statute, one Alaskan has as much right to use wildlife as another, but, also by law, the landowner can regulate trespass on his own land as he sees fit.

The dilemma of increasing demand for wildlife use is only a little less complicated on public lands where constraints of private ownership are not in effect. In substantial portions of the 80 million acres of d2 lands under consideration by Congress, wildlife uses such as hunting, trapping, observing, or otherwise enjoying wildlife may be severely restricted or prohibited. Loss or severe restriction of these uses in large areas of federal domain is in itself a problem for those desiring to hunt and trap, or use wildlife in other ways, but the problem is compounded because the demand for these uses is not likely to go away. Rather, it will shift to other areas still available for these uses. Wildlife management programs then must cope with this concentrated demand and the stress it places on resources of a reduced land area.

With the many future owners of Alaska's lands and their diverse interests, a great challenge will be to achieve agreement on management that will benefit wildlife no matter whose land they're standing on. Many species will regularly cross property boundaries, and it will be very important that habitat preservation or manipulation and other management measures undertaken for the benefit of wildlife are a truly cooperative venture among landowners.

Development of Alaska's natural resources has spurred interest in Alaska ever since the first Russian ship groped its way through the storms and fog to find and claim "The Great Land." The history of development in Alaska is really more a chronicle of exploitation, crammed with a thousand shaky schemes to make men rich and sprinkled with a few that succeeded. Alaska survived, more by its vastness, remoteness, and by chance than by the enlightenment of men. Alaska is still vast but it is no longer remote, and its future condition as a unique environment for wildlife and for people depends upon the attitudes and actions of society much more than in the past.

Resource development, such as logging, mining, oil extraction, dam construction, and other activities are often viewed as the beginning of the end for wildlife. This is not always the case, but such resource uses do present potential problems to wildlife, wildlife habitat, and wildlife management because they often involve rapid and substantial habitat changes that persist for long periods of time. To most people, the change most immediately obvious when development occurs is a loss in aesthetic quality. Development involves change, and with few exceptions people view such change as an aesthetic loss. Although it is not mentioned in the following discussion, the degradation of aesthetic quality is a problem common to all forms of development.

Logging practices in Southeastern Alaska have been a source of concern to wildlife (and fisheries) biologists for years, and recently became national news when a court decision banned clear-cutting. Modern logging in Southeastern Alaska usually involves clear-cutting of mature forests because that is the most economical method in areas of even-aged trees where few or no roads exist, the country is rugged, and forests are a kind of jungle. "Clear-cutting" means cutting all timber on a selected



piece of ground. The ground cover vegetation is pretty well cleared also, by heavy equipment used in logging.

Although shrubs of various kinds grow up in clear-cuts, there is some question of how beneficial they may be to deer, particularly in large clear-cuts, where deer may be reluctant to go far from the edge of timber, or deep snow prevents them from doing so. Clear-cuts provide new deer browse (primarily in snow-free periods) for 15 to 20 years, but after that little food is available. Effects of clear-cuts on other species are even less well known. Where logging occurs next to salmon streams, siltation, stream blockage, and higher water temperatures may reduce or eliminate the stream's suitability for spawning or for young salmon and for other aquatic life, and may indirectly affect brown bears, black bears, and numerous furbearers that feed along these streams. Bald eagles nest in trees along the beaches, and they apparently require virgin timber for nesting. Even in very old clear-cuts that now have trees, eagles apparently do not nest.

Logs are usually stored in floating rafts which are held in sheltered bays, or estuaries, where freshwater streams mingle with the ocean. Estuaries are prime "nurseries" for many marine invertebrates and fishes, and pollution from logs and bark that is soaked or worn off can seriously affect the marine life of estuaries. Log rafts often scrape around the shallow bottom in response to tide or wind, and this too damages the habitat so important to young marine life. Thus, various birds and mammals that feed on the marine life of estuaries can be affected by what seem at first glance to be remote and unrelated events.

Logging in other parts of Alaska has not been extensive since the gold-rush days, but it is increasing in response to both domestic and foreign demand. Not much is known about effects of logging in these areas. Although logging was intensive in many places in the early days, no one paid much attention to its effects on wildlife. It may be that logging in Interior and Southcentral Alaska, can, with careful planning, benefit certain wildlife species without doing great harm to others.

Mining for many years has been synonymous with habitat destruction in parts of the U.S. where open-pit mines were developed. Alaska has had little of such methods, although scores of creek bottoms have been turned upside down by placer mining and dredging for gold. Now, 10 to 60 years after most gold mining shut down, it's hard to say what the impact has been or what it will amount to when another 50 years have passed. Much silt in numerous streams may have taken its toll on salmon and grayling, but impacts on wildlife are not well known. If extensive gold mining began once more, certainly habitat losses would result, but the importance of the losses is hard to predict.

In some cases roads or trails opened to reach mineral claims or mines have created erosion, thawing of permafrost and slumping, or other damage to habitat. Although some individual cases may do minimal damage, the accumulated damage may become significant, particularly if a great increase in mining should occur.

In the past, roads and trails built by and for miners provided access for commerce of the day. Some of these routes became roads which today allow thousands of wildlife users to reach new or different areas. The results have been both good and bad. Wildlife users were able to disperse to enjoy different areas and perhaps less crowding, but in certain areas the added hunting pressure was undesirable and proved detrimental to some big game species. Should new access be created by a future surge in mining, wildlife managers will have to be prepared to cope with the possibility of too much access by highly mobile hunters and other recreationists.

Impoundments, or lakes created by man-made dams are another form of



development that creates wildlife management problems. In general, the greatest problem caused by dams and their lakes is simply loss of the wildlife habitat to flooding. Few dams have been built in Alaska thus far, and relatively little habitat damage has occurred. Two proposed dams, however, illustrate the potential.

The Rampart Dam proposal was made in the early 1960's. With a dam near Rampart, on the Yukon River, the Yukon Flats would have been flooded, with the impoundment reaching nearly to the Canadian border. Ft. Yukon and several smaller villages would have been displaced along with several million acres of prime waterfowl, furbearer and big game habitat. Electric power was the purpose of the dam, and it was finally decided that the dam was not a good investment considering the returns it would bring. For wildlife resources of the state (and the nation), it was a fortunate decision. There is no way that production of wildlife in other areas could have been increased enough to make up for the losses that would have resulted from such a massive loss of prime habitat.

The "Devil's Canyon", or Susitna Dam, is a project currently being seriously considered. Its purpose is also the generation of electric power. A pair of dams would be built on the upper Susitna River where the river flows through a deep, relatively narrow valley. Habitat loss would be small compared to the Rampart Dam proposal, yet valuable wintering areas for moose and migration routes of caribou would be flooded, and increased human access would probably result. The effects of flood control on wildlife habitat below the dam are poorly understood, but it is known that periodic flooding is one of the main events that keeps river bottoms fertile and productive.

"Transportation corridor" is a currently-used phrase for a place to put roads, pipelines, electric lines or other systems for moving people, material or energy. Numerous transportation corridors for various anticipated uses have been proposed in Alaska. The best known such corridor in Alaska today is the Trans-Alaska Pipeline corridor, with its roads, camps, pipes and storage tanks.

For wildlife management, the problems of transportation corridors include habitat loss and disturbance of wildlife at critical times, but probably of more importance is how to regulate access and resource use next to the corridor, and how to insure that the pipeline, road or whatever may be built, interferes as little as possible with normal animal movements and behavior. While a single corridor through an area may have limited impact on wildlife, multiple corridors would very likely create much more serious problems by compounding the smaller influences of individual corridors.

Urbanization and related effects of an increasing human population, such as sprawling suburbs, private recreation property, roads, and fences, probably create more problems for wildlife and wildlife management than is commonly appreciated. Loss of wildlife habitat to urban expansion is often not very obvious, until comparisons are made with 5, 10 or 20 years past.

The amount of habitat lost in the Anchorage area over the last 10 years is startling, and can be appreciated only by comparing aerial photographs from 10 years ago and now. The same is true of the Fairbanks area, and to a lesser extent it is true of many smaller communities and roadside areas as well. In addition to habitat loss, disturbance by increased vehicle traffic, additional people, and more dogs and cats, places greater difficulties before wildlife as they attempt to find and use habitat once available to them but now gone or surrounded by "barriers." Conflicts between wild animals and people in urban and suburban areas often result in the elimination of the animals. Under such circumstances, wildlife numbers cannot help but decline.



A second impact of urban growth is the effect upon adjacent recreation areas. Urban dwellers characteristically look longingly to the country, and if possible they will buy recreation property somewhere near their homes. Again, the Anchorage area is a good example; many privately owned recreation lots have sprung up in the Matanuska Valley. Where formerly old homesteads and random fires created clearings that produced abundant winter food for moose, now private owners carefully guard their quota of maturing forest which they understandably treasure. The resulting reduction in winter range may have strong and long-term negative impact on the number of moose in the Matanuska Valley. Although it is a wildlife management problem, there may be no solution, at least within the choices presently available to the manager.

Pollution has only recently become a household word, even though it has long been a common problem. Alaskans are fortunate in having few serious pollution problems, but they do occur. Perhaps the most important source of pollution with respect to wildlife is oil development and transportation.

The effects of oil (or its by-products) may be direct, as when oil products spilled on lakes, rivers or oceans immobilize birds, ruin their waterproofing, or poison them. Oil spills are now infamous for the problems they have created for waterfowl and marine birds.

Indirect effects are more subtle, and in the long run they may be more important. Oil products can upset natural systems by killing or crippling small organisms upon which larger forms feed, or by similarly affecting young stages of larger forms. Either way, there's potential for impacts on game or food fishes, shellfish, waterfowl, sea birds and marine mammals. The indirect impacts of just a single spill are poorly understood, yet the potential for repeated spills exists and is probably increasing. Although more is being learned about the effects of oil spills, and more effort is now made to clean them up, the chief problem seems to be how to avoid them in the first place.

Use of Wildlife

Of all the problems of wildlife management, none are more perplexing to the wildlife manager, nor stir the emotions of the public like wildlife uses. People who would not blink an eye if Hoover Dam were plunked in the middle of Alaska, reservoir and all, are ready to fight if cow moose hunting is suggested! And how many years has it been since the "wolf controversy" didn't warm up the Alaskan winter and save a thousand souls from cabin fever? The list of wildlife issues that bring out the best, or the worst, in people seems endless. Alaskans have a personal and proprietary interest in wildlife, and as many views on wildlife uses as there are feathers on a falcon.

Is that a problem? No, and, yes. No - the public has the last word on how wildlife should be managed and their interest and input is essential if management is to turn out as they want it. But, yes - not everyone can be satisfied. Then, too, there are some people whose views are strictly self-serving, and who contribute more to the problems than to solutions.

Before a manager can think about how wildlife will be used and who will use it, he has to consider whether use can occur in the first place. For use to occur, wildlife populations must be maintained at levels where they can provide use; losses to natural factors must be considered and habitat must be maintained (land use).

To be used, wildlife must also be accessible. In many parts of Alaska little use occurs simply because people can't get to the animals. An increase in private land and some federal lands, discussed earlier, will



make wildlife even less available to the public. Everyone will feel more restricted as the human population and demands on wildlife grow, while wildlife populations and the lands where they can be used remain the same or shrink. What can be done?

There are a number of alternatives being used by other states where these kinds of problems are much more advanced than in Alaska: 1) increase access to remote areas; 2) make the public pay for access to private lands; 3) increase the number of animals in high use areas by means of habitat manipulation techniques; 4) accept more crowded conditions on public lands and at the same time reduce the success of the consumptive users; 5) limit the number of people who can use public lands to maintain satisfactory use experiences; and 6) rotate user groups on the same area (called "time and area zoning"). Most likely all of these alternatives eventually will be used in various combinations in Alaska. Increased restrictions on use seem inevitable.

The biggest problem of use is that of allocation or "who gets what." The public is made up of many interest groups who wish to use and enjoy wildlife in their own way; all have pretty much the same rights to do so, but there isn't enough wildlife to go around. There are many examples of user groups: the "locals" and the "outsiders," consumptive users and nonconsumptive users, recreational, "subsistence" and commercial users, residents and nonresidents, hunters and anti-hunters, majorities and minorities, and let's not forget the "haves" and the "have-nots."

One of the first questions to be settled is "who is which?" Is the man that kills a walrus and sells its ivory a subsistence user or a commercial user? Is a city dweller who hunts moose for meat a recreational hunter or a subsistence user? Is a hunter who photographs wildlife more a consumptive or nonconsumptive user?

If and when you can tell one user from another, the next point to consider is what each user's level of need is and how much use is adequate to satisfy it. Where should the priorities be? Physical need? Economic survival? Recreational enjoyment? There are few easy answers.

Although there are many instances of conflicting demands, one major problem which has befuddled nearly everyone is how to identify and fairly and adequately allocate resource uses between recreational and subsistence users. The State Constitution says that wildlife is "reserved to the people for common use," which means all Alaska residents have equal rights to use wildlife. However, many people living in the bush on low cash incomes depend more on wildlife (and other resources) for part of their livelihood than do urban-oriented people with regular jobs. The supply of wildlife is limited, so when the number of hunters increases, or when numbers of wildlife decline, somebody is going to return from the hunt empty-handed. The subsistence users are most severely affected, so it seems reasonable to give them some preference in use of wildlife. This has been done to some extent by adjusting seasons and bag limits to favor residents of a particular area, by a reduced fee (25¢) for hunting, fishing and trapping licenses for families with an income of less than \$3,600, by regulating use of airplanes or vehicles, and various other techniques. Recently the Board of Game was given the power to establish subsistence use areas if it is shown that recreational hunting will prevent subsistence needs from being met. In such areas regulations specifically favoring subsistence users (but not legally barring others from use) could be adopted.

Economic conditions in the state are changing, and more rural residents are earning substantial incomes which enable them to purchase more of their needs. The distinction between a subsistence user and a recreational user is often very fuzzy and is becoming more so. There is actually a broad spectrum of what is called subsistence use, that ranges from



nearly total dependence on natural resources to very little use. Just where to draw the line establishing what combination of resource use and wage earning qualifies as subsistence use and what does not is difficult. Then, too, many Native groups as well as other Alaskan residents have expressed the view that subsistence is not simply an economic matter, but a lifestyle and cultural necessity also, even though they have willingly abandoned many traditional means (a cultural element) of obtaining such subsistence.

This has complicated the problem further in that while the subsistence user's dependency on the resource is still very real, the impact of his use on wildlife has changed markedly from what it once was. Instead of spears and bone fishhooks, he now uses high-powered rifles and gillnets, and he now travels by powerboat, snow machine and aircraft. In short, he now has much the same impact on wildlife populations that his "recreational" counterpart does, and in some cases, a much greater impact. The result has been harvests of some species in certain areas which have been in excess of people's needs, too large for the species to support on a continued basis, or both.

Conflicts between other user groups at times assume major proportions. Take the wolf controversy as an example. There are some who feel "the only good wolf is a dead wolf." Others blindly extoll the virtues of wolves under any circumstance while ignoring their "faults." Surely there is a balanced approach possible, a middle ground, but sometimes it seems it is a "no man's land" and the wildlife manager is square in the middle! The result: costly, time-consuming court suits at the expense of the resources involved and the public.

The general problem of hunters versus anti-hunters is not likely to be solved overnight. Because both groups share an enthusiasm for wildlife and a basic concern for its welfare, as well as similar rights to enjoy their preferred wildlife use, the wasted energies of unproductive confrontations could be far better used to benefit both interest groups and the wildlife resource. Certainly this is one more area to pursue "detente."

What does the future hold? Increased demands and more conflicts, certainly. It will be a challenge to avoid the unfortunate polarization of Alaskans that seems to accompany conflicting interests. As competition increases, parochialism will become even more obvious in the attempt to retain local jurisdiction. Overlaps in advisory committee, borough, village council and state and federal agency jurisdictions may create chaos unless some integrated workable system for allocation is developed.

From past experience, it is clear that whatever uses or combinations of uses are provided for, actions are necessary to ensure that overuse is avoided. There are many technical considerations. Should hunting of females be allowed, and if so, under what circumstances? Should predator control be used, and under what circumstances? What measures must be taken to avoid overhunting? Should vehicles be restricted? Should hunter numbers be limited? Seasons closed? How can illegal hunting best be detected and controlled?

Under some circumstances, illegal hunting or trapping can be an especially critical problem. In an area with intensive legal hunting, a large illegal kill can force curtailment of legal uses, and in situations where wildlife populations are at low levels, illegal kills can tip the balance and cause the populations to decline.

Enforcement of hunting, trapping, and fishing regulations is primarily the responsibility of the Division of Fish and Wildlife Protection, in the Department of Public Safety. However, most Fish and Game biologists are also deputized. Even so, the total number of enforcement officers is relatively small and consequently enforcement coverage of the state



is thin because of the state's size and because of the seasonal need to concentrate enforcement efforts on crucial problem areas.

Additional factors complicate the problem. Over such a large area it is extremely difficult to keep track of thinly scattered, highly mobile hunters. Also, many hunters are from out of state and are able to avoid prosecution by leaving Alaska before the violation is discovered or before a "hard" case can be put together. Contributing importantly to indifferent disregard for game regulations is the lack of meaningful penalties for convicted violators. The Alaska court records show a long history of suspended sentences and "slap on the wrist" penalties that have had little effect, except perhaps to encourage continued violations. Recently there has been some improvement in sentencing of violators and a continuation of this trend is most desirable.

Management Limitations

One final category of problems, here called management limitations, is perhaps the most important of all because it affects the capabilities of the Department of Fish and Game in solving all those other problems heretofore discussed, and hence its ability to meet its responsibilities to the resource and to the public. These limitations have to do with the Department's relationship to other agencies, the Legislature, and the public.

Both the state and federal governments have wildlife resource management responsibilities, but the objectives of each are not always in concert. Federal agencies such as the National Park Service, the Fish and Wildlife Service, the Forest Service and the Bureau of Land Management have been around for a long time. Their actions are sometimes ponderous, slowed by massive bureaucracies, governed by long-standing policies and inflexible guidelines, administered by officials far removed from Alaska, and influenced by a national public with concerns which sometimes differ markedly from those of Alaskans.

To be sure, there are advantages to such a slow-but-steady system, the chief of which is perhaps that it is less subject to fickle or irresponsible management actions or local political influences. But there are as many instances where inaction is as damaging as the wrong action, and in Alaska, where changes are occurring at breakneck speed and where unique situations demand special considerations, innovative approaches to resource management are needed.

Alaska, as other states, has traditionally exercised jurisdiction over its resident wildlife species, including those on most federal lands within the state. Wildlife within national parks, however, is managed by the federal government in that national parks are traditionally closed to hunting and trapping. Federal wildlife refuges are generally open to hunting, but various regulations control use of airplanes, all-terrain vehicles and snow machines, and otherwise influence the distribution, numbers, and access of recreationists. Thus these regulations essentially become part of the State regulations affecting wildlife use. As more federal reserves are dedicated by Congress, additional rules and regulations will undoubtedly come into effect.

In addition, State jurisdiction over most species of birds, marine mammals and endangered species has been superseded by federal regulations made pursuant to national legislation and international treaties. Use of any species so affected is allowed only under the guidelines established by the federal government. Waterfowl hunting regulations must fit the general framework of federal regulations and be approved by the Secretary of the Interior. Management of marine mammals was withdrawn from the State by the Marine Mammals Protection Act of 1972, but under provisions of that act walrus management (subject to federal approval) was returned



to the State. Management of other marine mammals may follow the same costly and circuitous route. Federal laws protecting endangered species and some groups of birds also set some restrictions on State wildlife management.

Land use policies of federal and state agencies and of private landowners strongly affect management of wildlife. The Department of Fish and Game owns very little land. As a result, it is most often only advisory to other agencies on matters such as land use planning, habitat protection or manipulation, land disposal, and access regulation. In some cases this arrangement has been a stumbling block to various management efforts.

Funding largely determines what and how much the Division of Game can accomplish, not only by limiting the amount of work that can be conducted, but also by limiting the number of biologists on the staff (and therefore the time each man can devote to different tasks). Everyone knows a dollar doesn't go far in Alaska, and for the Game Division the mileage has been getting worse. Why? Because budgets have not kept pace with inflation or need. Each year more and more money goes to pay for "fixed costs" (salaries, rents, and equipment) and less and less is left for "operations" - (transportation, supplies, and contractual services).

One important problem arising from the small staff available is that not all parts of the state receive the attention they should. Although field offices are maintained in many of the state's larger communities, additional field staffing is required in various areas where the mushrooming need for more and better quality information on wildlife has become apparent.

In addition, unprecedented demands on the staff have resulted from the interaction between State and federal agencies on such matters as "d2" lands, marine mammal management, Outer Continental Shelf oil leasing, Coastal Zone Management, oil pipeline impacts and various other matters, all of tremendous importance to the future welfare of wildlife in Alaska.

Because there is so much to do, some things can be done well and others don't get done at all. One of the casualties of the "crunch" has been activities directed at keeping the public fully informed as to the status of wildlife, the reasons behind certain regulations, and, in general, what the Game Division is up to. The result? A serious credibility gap which has had far-reaching impacts on many Department programs.

Information and education activities aren't the only ones to suffer. Research activities needed to acquire badly needed information on wildlife have been cut back, and many survey and inventory programs are reduced to the "bare bones." Inadequate information is available about some species such as furbearers and unclassified wildlife because all the attention is focused on "problem" species such as caribou, moose, wolves and bears.

The cry for money is a chronic complaint among government agencies and it rarely catches a sympathetic ear. Nevertheless, the problems of funding are acute for the Game Division and they impose serious limitations on the Division's capability to meet its responsibilities.

Control of the Department's budget is only one of several ways the Legislature affects wildlife programs. Each year, legislation is passed which affects wildlife and its use either directly by governing use, or indirectly by influencing other land uses which in turn impact wildlife.

Because legislation is generally relatively inflexible and permanent (unlike fish and game regulations which are annually reviewed and revised, or policies which can be changed on short notice), legislation directly affecting wildlife is valuable and necessary to long-term direction and



continuity in wildlife programs if it is carefully considered, addresses matters of broad scope and provides a framework within which regulations may be promulgated and management can remain flexible. In contrast, detailed and specific legislation directed at regulation of individual programs removes the "elbow room" needed by managers to cope with dynamic wildlife situations. Once enacted, laws are infrequently repealed and by their very existence become traditional. Such "fixtures," if undesirable, reduce options and therefore the effectiveness of managers.

Legislation not directed at wildlife also can have significant secondary impacts on wildlife. Legislation affecting classification of lands for agriculture, private ownership, or state parks can be a detriment or sometimes may benefit wildlife through changes in, or protection of, habitat. Also, such measures, and others which influence settlement and transportation, affect utilization of wildlife by changing its accessibility.

The Division of Game operates within the general set of administrative operating rules and regulations, and legislative and fiscal schedules common to all State agencies. These assorted processes of State government all affect wildlife management programs to various degrees.

Finally, the public affects the things wildlife managers do by influencing actions of elected and appointed government officials including legislators, governors, commissioners, and members of the Board of Game. It is the actions of such officials which set the bounds on what professional managers can do.

Because wildlife managers act in the public interest as custodians of the public's resource, they welcome and encourage public interest and involvement in management decisions. There are times, however, when public sentiment can impede sound management, sometimes threatening the resource itself, but more often reducing or eliminating reasonable utilization. Popularity is not always synonymous with public interest.

We have already said something about the problem of identifying the various "publics." Everyone knows that with most issues there is a vocal minority and a silent majority, and the perceived public desire may not necessarily be the real broad-based public opinion. Yet it is the perceived public opinion that sways elected and appointed government officials, whose actions have the dual motivations of seeing to the public interest and of staying in office. Also, the public, or segments of it, are sometimes subject to emotionalism and rapid polarization over issues, and government officials sometimes react with corresponding brevity. The result: actions of the moment, in response to limited, special, and/or short-lived interests, having long-term consequences on the entire public body.

With wildlife management, as with politics, everyone seems to be an expert on the subject. However, while use and enjoyment of wildlife are common to all, the expertise required to manage wildlife is not. The problem comes in balancing scientific professionalism with public involvement. The public should understand that wildlife management must be based on biological and ecological principles and that it should be conducted with the highest standards of professional scientific expertise. Wildlife managers in turn should be responsive to changing public attitudes concerning wildlife and its use, and managers should be more cognizant of their custodial role. Essentially it is a problem of communication, in both directions. It is hoped that the information and proposals contained in these Alaska Wildlife Management Plans will be the basis of an improved mutual understanding and effective communication.

MANAGEMENT GOALS

We have selected six management goals for these wildlife plan proposals. The goals are categories of use into which the various appropriate forms of human interactions with wildlife can be grouped. The goals provide direction for management with flexibility in mind. In most individual plans, multiple goals are assigned: a single primary goal and one or more secondary goals. Each goal emphasizes one general type of use opportunity. This does not necessarily mean that other uses will be excluded. Rather, it recognizes that if uses conflict, uses appropriate to the stated goals will receive preference. Furthermore, uses indicated by stated goals will be actively managed for. The overall content of each plan will further define goals for that specific area.

All proposed management goals are based on Alaska's constitutional mandate that its wildlife shall be reserved to the people for common use and shall be utilized and maintained on the sustained yield principle for the maximum benefit of the people. Use on a sustained yield basis for the maximum benefit of the people will take on different dimensions depending on individual situations. As an example, in rural Alaska the benefit of the people may, in large part, be concerned with the harvest of meat for domestic use, and yield would refer to pounds of meat or number of animals harvested. In another situation the greatest benefit to the people may accrue from only observing wildlife. Yield in this instance refers to the important but often intangible enjoyment derived from viewing or otherwise being aware of the presence of wildlife.

The choice of goals and their various combinations are intended to accommodate the variety of situations which exist in Alaska. The six wildlife management goals are:

1. TO PROVIDE AN OPPORTUNITY TO VIEW, PHOTOGRAPH AND ENJOY WILDLIFE.
2. TO PROVIDE FOR AN OPTIMUM HARVEST.
3. TO PROVIDE THE GREATEST OPPORTUNITY TO PARTICIPATE IN HUNTING.
4. TO PROVIDE AN OPPORTUNITY TO HUNT UNDER AESTHETICALLY PLEASING CONDITIONS.
5. TO PROVIDE AN OPPORTUNITY TO TAKE LARGE ANIMALS.
6. TO PROVIDE AN OPPORTUNITY FOR SCIENTIFIC AND EDUCATIONAL STUDY.

A thorough understanding of the goals is essential to understand and evaluate the plans. We urge you to study the following explanations of each goal.

1. TO PROVIDE AN OPPORTUNITY TO VIEW, PHOTOGRAPH AND ENJOY WILDLIFE.
This goal recognizes the great values of being able to see wildlife in a context not necessarily related to actual taking, and emphasizes yield in terms of aesthetic values. There are important areas where the combination of wildlife abundance, unique opportunity and human access result in this use accruing the maximum benefit to people. Emphasis is on viewing and photographing and may exclude all other uses. However, other uses including hunting may be allowed if compatible.



So-called "nonconsumptive" use of wildlife is popular in the state today. Viewing and photographing occur most frequently along the state's road and trail systems, areas which often receive heavy hunting use and which are most susceptible to human development. In some areas where unusual abundance, visibility, or accessibility of wildlife enable ready observation by the public without detrimental effects to wildlife, management for these purposes should be provided. Prompt identification, establishment and management of such areas is necessary to avoid losses to encroaching development and competing uses. Many of these areas have been previously identified.

Management which provides an opportunity to view, photograph, and enjoy a species is concerned with maintaining a sustained, observable population of that species. Human uses of wildlife or of the area supporting wildlife which significantly detract from the opportunity to observe the primary species may be regulated or restricted. Hunting for the primary species is generally excluded during the period when most observation takes place. Limitations on the number, distribution, or activities of viewers and photographers may be necessary where unlimited use would detract from the opportunity to observe wildlife or cause undue disturbance. Hunting may be allowed when year-round or area-wide observation does not occur. In some situations concurrent consumptive and "nonconsumptive" uses may be compatible.

Viewing and photographing are often compatible with other uses; this is reflected in the numerous plans where viewing and photography occur in combination with other goals. When applied as a secondary goal the emphasis on viewing and photographing is subdued, and uses addressed by primary goals may at times limit opportunities for observation. In some cases, however, management for other primary goals may enhance opportunities for observation of wildlife.

2. TO PROVIDE FOR AN OPTIMUM HARVEST.

This goal emphasizes yield of animals for human use. Within this goal are accommodated the needs for domestic utilization, especially by rural residents, but also by recreational hunters primarily interested in meat; commercial harvests; and situations involving maintenance of wildlife populations at specified levels. Aesthetic quality of experience and production of trophy animals may be compromised.

Direct domestic utilization of wildlife is important to many rural residents and is a valuable supplement to the larders of urban citizens. Emphasis of management will be to achieve an optimum harvest. This goal is also desirable in situations where excessive wildlife numbers develop and the welfare of wildlife populations or the safety of human life or property will require maintaining some lower optimum number of the species in question. Finally, management to provide for an optimum harvest is used where direct commercial utilization is warranted.

Optimum harvest can be defined as the amount or level of yield that is most favorable to some specified end result, whether it is productivity or density of a wildlife population, within the constraints of sustaining that population for future use. Such a harvest will differ from area to area, from species to species, and over time.

Management of populations under this goal will be intensive, involving manipulation of the numbers and/or sex and age structure of the population. Controls on methods and means of taking game, adjustments to lengths of



hunting seasons and bag limits and restrictions on the number of hunters are ways by which use will be regulated. In cases where production of food is important to local residents, the species may be managed to maximize sustained productivity, and use may be regulated to favor those people with the greatest dependency on the resource.

Management under this goal has wide latitude depending on the conditions and requirements of any particular area where it is employed. The goal is often compatible with the goal of providing the greatest opportunity to participate in hunting and with other goals by regulating the time and place of use. This goal may adversely affect aesthetic hunting considerations and the production of trophy class animals. "Nonconsumptive" uses may be available on an opportunistic basis.

This goal differs from the other five goals because it does not directly consider opportunity for use, but rather use itself. Perhaps the greatest similarity between this goal and other goals is with that of providing the greatest opportunity to participate in hunting. Under both goals the upper limit to consumptive use is the maximum harvest that a population can sustain. But whereas "greatest opportunity to participate in hunting" is dependent on the optimum harvest, attaining an "optimum harvest" is not dependent on providing the greatest opportunity to participate in hunting. Yield of the latter is participation. In the former, yield is in number of animals (biomass) that can be taken.

3. TO PROVIDE THE GREATEST OPPORTUNITY TO PARTICIPATE IN HUNTING.

This goal recognizes the recreational value of hunting and emphasizes the freedom of opportunity for all citizens to participate. In this case, the opportunity to participate is deemed more important than success or standards of quality of experience.

As Alaska moves away from the open frontier lifestyle, recreational hunting is an increasingly important use of wildlife in the state. Yet even as the demand for recreational hunting is growing, the area available for such use is decreasing. Extensive private land ownership and additional extensive parks, refuges and other lands designated for limited use will strongly affect recreational hunting opportunities in the state.

Providing the greatest opportunity to participate in hunting will not mean maximizing opportunity to kill. Management will consider participation more desirable than success. Opportunity must sometimes be limited to maintain harvests within the numbers that a wildlife population can sustain. Restricting harvest will usually involve altering methods and means of taking game, bag limits, and lengths and timing of seasons before limiting number of hunters. When participation must be limited, time allowed for a hunt will be limited before limiting number of hunters.

Management to provide the greatest opportunity to participate in hunting often will be similar to providing for an optimum harvest, because where demand to hunt is sufficient, full beneficial use of the resource will be allowed. Consequently these two goals are recommended in combination in many areas. Used as the only goal in an area, greatest opportunity to participate in hunting may compromise aesthetic considerations or reduce opportunity to take large (trophy) animals; "nonconsumptive" uses would be available on an opportunistic basis.



4. TO PROVIDE AN OPPORTUNITY TO HUNT UNDER AESTHETICALLY PLEASING CONDITIONS.

This goal emphasizes quality of hunting experience. To achieve it will often require limiting the number of people who may participate, as well as the means used to take game. Criteria for such areas include natural or wilderness character of the land, low hunter densities, and emphasis on hunting without the aid of mechanized vehicles.

Quality of experience is becoming increasingly important to a greater number of hunters, especially for those who value the aesthetics of the hunting experience as much or more than hunting success. For them the proliferation of off-road vehicles, riverboats, airplanes and the "hunter behind every bush" situation is distasteful. Under this goal, aesthetically pleasing conditions refers to a hunting experience which usually includes low hunter densities, controlled methods of transport, undisturbed wilderness character, and regulation of other conflicting uses, separately or in combination. Human activities which adversely affect the aesthetic quality of the hunting experience will be discouraged, limited, or prohibited. Opportunity as used here does not guarantee unlimited participation, and would normally imply limits on participation. Controls on hunter transport may reduce hunting success. This goal will not usually require large or dense populations of wildlife, nor will animals necessarily be of large (trophy) size. Harvests need not attain the highest levels that can be supported by the population.

The value of aesthetics is often considered when other goals are primary, and this goal is often used in combination with other goals to reflect the considerations of quality not explicitly stated in other goals. To the extent that other uses conflict with aesthetic values, timing and zoning of the area of use can be employed to obtain greater utilization of a wildlife population.

5. TO PROVIDE AN OPPORTUNITY TO TAKE LARGE ANIMALS.

This goal emphasizes the opportunity for hunters to take large animals. To accomplish this goal will usually mean that participation of hunters will be limited and the species population within the area may be manipulated to produce the maximum number of large animals.

Many recreational hunters are especially interested in taking a large animal. With development and increasing human pressures on wildlife resources, the opportunities for hunters to be selective for large animals are becoming fewer. Management under this goal may ensure that in some areas and for some species such opportunity will be retained. Areas recommended for management under this goal must have a reasonable number of large, old or trophy animals available or the potential to produce such animals. Opportunity as used here would not guarantee unlimited participation, but would provide a reasonable chance of success to those who do participate. Management will often be intensive, involving manipulation of the sex and age composition to produce large animals, and possible controls on number and distribution of hunters.

This goal and that of hunting under aesthetically pleasing conditions will often be compatible, and hunting both for large animals and under aesthetic conditions will be enjoyed simultaneously. Management for other goals is possible when the production of large animals is not affected. However, intensive management to produce large animals may



require taking other population segments by other users. For example, to produce large bull moose it may be necessary to harvest substantial numbers of female moose. This goal does not preclude "nonconsumptive" uses, and in fact may enhance "nonconsumptive" use experiences by providing improved opportunities to view large animals.

6. TO PROVIDE AN OPPORTUNITY FOR SCIENTIFIC AND EDUCATIONAL STUDY.

This goal recognizes the desirability and need to provide for scientific and educational use of wildlife to achieve a scientific basis for evaluating management options. Such management may require setting aside areas solely for this purpose, but in most cases, this use is compatible with other types of use.

The Alaskan wilderness, including its wildlife, is a unique natural laboratory for the scientific study of ecosystems and wildlife biology, and for the educational enrichment of the people. Scientific study and education have continually taken place in many areas of Alaska, reflecting the wide compatibility of such use with other uses of wildlife. Occasionally however, undisturbed or closely controlled conditions are necessary for study requirements and justify the designation of areas managed primarily for the scientific and educational study of wildlife. Study requirements would specify the extent to which other uses, both consumptive and nonconsumptive, would be allowed. In some cases, intensive population or habitat manipulation could be necessary to achieve study objectives. Participation could be limited.

This goal appears most often in combination with the goal of providing an opportunity to view, photograph and enjoy wildlife because they often have much in common. Educational studies are often enhanced by relatively undisturbed wildlife populations in areas established for viewing and photography. Providing for scientific and educational study is proposed as a primary goal in very few areas. Such limited direct application of this goal emphasizes the fact that opportunities for scientific and educational study exist throughout the state and special designation is unnecessary unless intensive population or environmental controls are required.

In Arctic Alaska Dall sheep (*Ovis dalli*) are continuously distributed along the north slope of the Brooks Range from the Canadian border as far west as the Wulik Peaks. Minimum estimates of sheep numbers in the region place the current population size at about 10,000 sheep. No well-documented population fluctuations have been observed in the sheep populations throughout Arctic Alaska. No populations are currently known to be expanding, and it is thought that sheep numbers in the region, while subject to fluctuations, are comparatively stable at about current numbers.

Dall sheep are usually found in alpine habitat. During summer, they occupy relatively large areas. Mineral licks are an important component of sheep habitat in summer. Many important mineral licks are known throughout the Brooks Range. Sheep, especially ewes with lambs, will frequently travel several miles to use mineral licks where they eagerly eat the mineral rich soil. The exact nature of sheep dependence on mineral licks is not fully understood. The use of mineral licks also serves to intermingle otherwise discrete populations and is of importance in maintaining genetically healthy herds.

Winter ranges are the third critical component of Dall sheep habitat. Winter ranges are characterized by windblown ridges or slopes. These ranges usually occur at the mouths of tributaries along major drainages where prevailing winds clear winter snow from forage. A herd occupying many square miles of summer habitat may be restricted to, and limited in size by a winter range of relatively few acres. Some herds occupy winter ranges which are several miles from their summer ranges and migrate between the two. These seasonal migrations often include side trips to utilize mineral licks, and are an ingrained tradition of each population. Sheep are extremely loyal to their traditional summer ranges, winter ranges and mineral licks and appear on these ranges at about the same time each year.

Predation in Arctic Alaska does not appear to be a major factor in limiting sheep numbers, however, occasional situations arise where predation may depress sheep numbers. Wolves are the main predator on sheep, but wolverines, bears and sometimes eagles have been known to take sheep.

Dall sheep in Arctic Alaska are used for nonconsumptive wilderness values and for consumptive recreational and domestic utilization. Traditionally only rams with horns of 3/4 curl or greater have been legal game during an August-September season. For the last several years sheep hunters have spent an average of about 700 man days per year hunting for sheep in the region. The number of hunters has averaged about 150 and the number of rams harvested annually has averaged about 110 over this period. Resident hunters comprise about 65 percent of the hunter effort and have a success ratio of about 60 percent. Nonresident hunters have a success rate of about 85 percent, perhaps reflecting the benefit of the mandatory presence of a guide. Domestic utilization of Dall sheep has played a minor but continuing role in the Arctic Region. Kaktovik and Anaktuvuk Pass Eskimos take sheep, but these people have never been entirely dependent on sheep for food. It is difficult to assess the future trends of hunter pressure and harvest in the Arctic Region but hunter effort will probably be greater than it has been in the past.



PROBLEMS

- * Expanding human land use may adversely affect sheep through the alteration of important habitat or through disturbance of sheep use of critical areas. Mineral licks, winter ranges, lambing areas, and migration routes are particularly susceptible to damage or interference from such activities as mining, construction in transportation and utility corridors and development of alpine recreation sites. Critical habitats must be protected from alteration or undue disturbance.

- * Increases in numbers of hunters, development of access, and improved transport methods have reduced availability of legal rams, even in once-remote and lightly hunted areas. In some locations most legal rams are removed annually. In some areas the average size of rams available to hunters has decreased. In addition to reduced hunter success, increased hunting pressure has lowered the quality of the hunting experience. Management measures to regulate hunter density and distribution, and to increase the number of legal rams available to hunters should receive greater emphasis.

1. NORTH SLOPE BROOKS RANGE SHEEP MANAGEMENT PLAN

LOCATION

Game Management Unit 26, the north slope of the Brooks Range.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control the number and distribution of hunters, if necessary, to maintain aesthetic hunting conditions.
2. Discourage land use practices that adversely affect the wilderness character of the area.

THE SPECIES

About 10,000 Dall sheep are currently estimated to occur north of the crest of the Brooks Range. No significant population fluctuations have been documented for sheep of this area.

Natural mortality rather than hunting is the primary source of mortality. Although predation may occasionally depress local sheep populations, it does not appear to be a major factor in limiting sheep numbers at this time. Wolves are the main predator on sheep, but wolverines, bears and sometimes eagles are occasional predators. Other causes of natural mortality such as accidents, disease, and starvation also limit population growth.

The condition of the Brooks Range Dall sheep habitat is not known, but stability of sheep numbers in recent years suggests that range conditions have remained unchanged. Because of the long winters and short cool summers, vegetation growth is slow and habitat is limited; further expansion of the sheep population is not anticipated.

Dall sheep in the Brooks Range are used both for nonconsumptive wilderness values and for recreational hunting. The wilderness character of the region and the opportunity to hunt in an area where chances of encountering other people are minimal are factors which draw many recreational hunters to the area.

About 150 hunters annually have hunted in the area in recent years, taking an average of 110 sheep each year. Residents comprise about 65 percent of the hunters and have a success ratio of about 60 percent. Nonresident hunters have a success rate of about 85 percent (the mandatory presence of a guide may result in higher success).

The use of Dall sheep for food by Kaktovik and Anaktuvuk Pass Eskimos has played a minor but continuing role. This use has been traditional, but these people have never been entirely dependent on sheep for food. The current use of the resource in late winter with the aid of aircraft and snow machines underscores the changing pattern of use from that of former years.

Although boats, horses and off-road vehicles are also employed, the large majority of sheep hunters in the Brooks Range use aircraft to



DALL SHEEP IN INTERIOR ALASKA

In Interior Alaska Dall sheep (*Ovis dalli*) are found in the Tanana Hills, White Mountains, Mentasta Mountains and the north side of the Alaska Range and Wrangell Mountains. Sheep are also continuously distributed along the south slope of the Brooks Range from the Canadian border west to the Schwatka Mountains. Alaska Range sheep are continuous in their distribution from the Muldroe Glacier in Mt. McKinley National Park eastward to the Mentasta Mountains and along the north side of the Wrangell Mountains to the Canadian border. In the Tanana Hills sheep occupy the alpine areas of Glacier Mountain, the headwaters of the Charley River, Twin Mountain, West Point, Mount Sorenson and the headwaters of the Salcha and East Fork of the Chena Rivers. In the White Mountains sheep are found in the vicinity of Mount Victoria, Mount Schwatka, Mount Prindle and Lime Peak.

Recent surveys have established minimum numbers of Dall sheep in Interior Alaska as follows: Mt. McKinley Park 900, the Alaska Range from McKinley Park to the Delta River 4200, the Alaska Range from the Delta River to the Tok-Slana cutoff 2300 and the Mentasta Mountains and north side of the Wrangell Mountains 3700. The south slope of the Brooks Range is thought to contain at least 7500 sheep.

No well documented population fluctuations have been observed in Interior sheep populations except for those in Mt. McKinley Park. Park populations experienced drastic reductions in 1929 and 1932 as a result of unusually severe winters. Since that time the population appears to have fluctuated about a mean of about 1000 sheep. No Interior sheep populations are currently known to be expanding, and it is thought that sheep numbers in the region, while subject to fluctuations, are comparatively stable at about current numbers.

Dall sheep are usually found in alpine habitat. During summer, they occupy relatively large areas of their annual range and remain almost entirely above brushline. Sheep in the Tanana Hills and White Mountains, however, occupy habitat which is lower in elevation. These sheep are often seen near spruce forests and apparently descend to valley bottoms in order to obtain water. Mineral licks are an important component of sheep summer habitat on many Interior sheep ranges. Many important mineral licks are known throughout the Alaska Range and Brooks Range. Some have been located in the White Mountains and northern Wrangells. Sheep, especially ewes with lambs will frequently travel several miles to use mineral licks where they eagerly eat the mineral rich soil. The exact nature of Dall sheep dependence on mineral licks is not fully understood. The use of mineral licks also serves to intermingle otherwise discrete populations and is of importance in maintaining genetically healthy herds.

Winter ranges are the third critical component of Dall sheep habitat. Winter ranges are characterized by windblown ridges or slopes. These ranges usually occur at the mouths of tributaries along major drainages where prevailing winds clear winter snow from forage. A herd occupying many square miles of summer habitat may be restricted to, and limited in size by, a winter range of relatively few acres. Some herds occupy winter ranges which are several miles from their summer ranges and migrate between the two. These seasonal migrations often include side trips to utilize mineral licks, and are the ingrained tradition of each population. Dall sheep are extremely loyal to their traditional summer ranges, winter ranges and mineral licks and appear on these ranges at about the same time each year.

Predation in the Alaska Range and Wrangells does not appear to be a major factor in limiting sheep numbers, however, occasional situations arise where predation may depress sheep numbers. Wolves are the main predator on sheep, but wolverines, bears, lynx and sometimes eagles have



been known to take sheep. The terrain of the Tanana Hills and White Mountains is less rugged than that of the Alaska Range and Wrangell Mountains and consequently may not provide sheep with frequent escape possibilities. Consequently, it is thought that predation, particularly by wolves, may play a more important role in these areas than further south. Little is known of predation in the Brooks Range.

Sheep were formerly hunted for market in the Alaska Range, but the current uses of sheep are primarily for recreation. Sheep in Mt. McKinley Park in the Alaska Range are used exclusively for viewing, photography and associated nonconsumptive wilderness values. In other parts of Interior Alaska sheep are used for recreational hunting as well as for nonconsumptive values. Traditionally only rams with horns of 3/4 curl or greater have been legal game during an August-September season. For the last 4 years sheep hunters have spent an average of about 5,000 man days per year hunting for sheep in Interior Alaska. The number of hunters has averaged about 1,150 and the number of rams harvested has averaged about 450 over this period. Resident hunters comprise about 77 percent of the hunter effort and have a success ratio of about 31 percent. Nonresident hunters have a success rate of about 67 percent, perhaps reflecting the benefit of the mandatory presence of a guide. Recreational hunting pressure in the Interior is expected to increase in proportion to increases in human populations. Domestic use of Dall sheep has never played a significant role in the Interior Region. Some domestic use is traditional in the Brooks Range, but sheep are not a major food item.

PROBLEMS

- * Expanding human land use may adversely affect sheep through the alteration of important habitat or through disturbance of sheep use of critical areas. Mineral licks, winter ranges, lambing areas, and migration routes are particularly susceptible to damage or interference from such activities as mining, construction in transportation and utility corridors, and development of alpine recreation sites. Critical habitats must be protected from alteration or undue disturbance.

- * Increases in numbers of hunters, development of access, and improved transport methods have reduced availability of legal rams, even in once-remote and lightly hunted areas. In some locations most legal rams are removed annually. In some areas the average size of rams available to hunters has decreased. In addition to reduced hunter success, increased hunting pressure has lowered the quality of the hunting experience. Management measures to regulate hunter density and distribution, and to increase the number of legal rams available to hunters should receive greater emphasis.

3. SOUTHERN BROOKS RANGE SHEEP MANAGEMENT PLAN

LOCATION

Game Management Units 24, 25 and that portion of 23 which includes the drainages of the Noatak River above its confluence with Mayumerak Creek.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control the number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions.
2. Limit the harvest of rams to no more than the annual increment of three-quarter curl rams.
3. Discourage land use practices that adversely affect the wilderness character of the area.

THE SPECIES

Sheep which inhabit this large area exist in discrete populations each of which has its well-defined traditional ranges. The entire extent of the area included in this plan has never been completely surveyed for Dall sheep so the actual number of animals present is not known. Based on limited aerial surveys, the number of Dall sheep in this area is estimated to be at least 7,500. There is little doubt that Dall sheep numbers fluctuate and that there may be declines or increases in the future, but these fluctuations are not expected to be extreme. Unless exceptionally adverse conditions occur, sheep population numbers will probably continue to fluctuate near present levels.

Most natural mortality is caused by weather and predation. The influences of predation are not known, but are thought to be minimal under normal conditions. The influences of weather are most apparent in lamb production and sometimes result in the loss of a lamb crop. Where hunter pressure is light, as it has been in much of the southern Brooks Range, weather influences on trophy production are not readily seen because of the standing stock of trophies on the range. In much of the southern Brooks Range trophy availability is good. This high availability of trophies results from the presence of lightly hunted populations containing relatively large numbers of old rams. A few areas with good access have received high hunter pressure in the last few years.

The southern Brooks Range has received an increased amount of use in the 1970's, but the number of hunters appears to have leveled off in the past 2 to 3 years at about 200 hunters per year. These hunters harvest about 115 rams per year. About 65 percent of the hunters are residents and they take about 55 percent of the harvest. In the past few years there has been a trend toward increased hunting by residents in the area. About 1,000 man days are spent hunting sheep in the southern



Brooks Range each year. Some domestic utilization by local residents occurs in the area, but it is limited and represents the opportunistic taking of sheep rather than an actual dependence on them as a food item. Nonconsumptive utilization of sheep in the southern Brooks Range occurs, but the extent to which it is incidental to other activities is not known. Many big game guides and outfitters have interests in this vast area. They are responsible for about 45 percent of the Dall ram harvest each year. Some guide operations have permanent facilities in the area.

PROBLEMS

- * Important Dall sheep habitat including mineral licks, lambing areas and winter ranges may be adversely affected by resource development. Mining and prospecting activity has been present in the area for many years, but recent developments have stimulated increased interest in utilization of non-renewable resources. The Department should identify important sheep habitat and should encourage regulation of resource development to minimize adverse impacts to sheep habitat.
- * The lack of enforcement of hunting regulations for residents of the area presents a potential for abuse. As demands on sheep in the area increase, the allowance for unregulated use will decrease. Enforcement of existing regulations will be necessary to avoid excessive use of sheep and to assure all users equal opportunity under the law.
- * Establishment of proposed "4 systems" areas such as the Noatak National Ecological Range, Gates of the Arctic National Park, and the additions to the Arctic National Wildlife Range may exclude or limit hunting in the southern Brooks Range. Additional large tracts of land will be transferred to private ownership under terms of the Alaska Native Claims Settlement Act and such lands may be closed to public hunting. Exclusion of hunting in some areas will result in concentrations of hunters in other areas, causing deterioration of aesthetic hunting conditions. Increased hunting pressure is also expected when the pipeline Haul Road is opened for public use. The Department will attempt to maintain public hunting over as wide an area as possible by participating in land use planning and coordinated management with other agencies. The Department should solicit the cooperation of private landowners to facilitate progressive management of sheep. Easements across private lands to public lands will be sought as provided for in the Alaska Native Claims Settlement Act. Densities of hunters may be controlled by use of permits.

IMPACTS

- * Hunter density will be limited by permits when crowded hunting conditions occur.
- * Large rams will be available to hunters.
- * Methods of hunter transport will be limited to those necessary for access to the hunting area.
- * Utilization of the sheep resource by some big game guides will be restricted to the extent that clients can obtain permits.
- * Viewing and photographing sheep in wilderness surroundings will be enhanced.
- * Resource development activities may be limited in time or area and expense of operations may be increased.

5. WHITE MOUNTAINS SHEEP MANAGEMENT PLAN

LOCATION

In Game Management Unit 20, that area included in the drainages of Preacher Creek upstream from its confluence with the north fork of Preacher Creek, Beaver Creek upstream from its confluence with Moose Creek, and all drainages into Beaver Creek which lie south of a line drawn from Why Lake to Three Sleep Point.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access and methods of transport to maintain aesthetic hunting conditions.
2. Control hunter numbers and distribution, if necessary, to distribute hunting pressure through the area.
3. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

In the White Mountains area Dall sheep occupy approximately 534 square miles of alpine habitat in the vicinity of Mount Victoria, Mount Schwatka, Mount Prindle, Lime Peak, Cache Mountain and the White Mountains. The population numbers about 285 animals and is geographically isolated from other sheep populations. Sheep occur in small, widely scattered groups throughout the range.

Habitat is limited by the low elevations and encroachment of surrounding spruce forests on the alpine tundra. Sheep often travel through forested areas either to reach water in the valley bottoms or to reach other suitable sheep habitat. The necessity of traversing forested areas, as well as the scarcity of rugged escape terrain in the alpine areas, makes these sheep more vulnerable to predators; however, data on mortality factors and rates are not available. The area is drier than other sheep range due to the light annual snowfall and dry Interior climate and the rapid drainage provided by the porous sandstone and limestone substrate. Two other requisites for sheep habitat are available: mineral licks and windblown slopes during the winter. The Tanana Hills-White Mountains area has potential for sustaining high densities of sheep; however, the present density of 0.5 sheep per square mile is among the lowest in Interior Alaska. There is no indication that sheep have overutilized the range. Although annual survey data are lacking, observations indicate that the population is stable.

Composition and productivity information was gathered at the Mt. Schwatka mineral lick during 1973 and 1974. Productivity was low with only 33 lambs per 100 ewes in 1973 and 23 per 100 in 1974. However, lamb survival in 1973 was excellent; there were 30 yearlings per 100 ewes in 1974. Information on productivity is not available either for preceding years at Mt. Schwatka or for the rest of the area. The small amount of hunting that has taken place during recent years has probably not affected productivity or availability of legal rams. Human exploitation and development have not occurred to any appreciable extent, providing a wilderness situation that is virtually undisturbed. However, some loss of sheep habitat may be occurring due to natural plant succession.



The area has the potential for producing trophy sheep. The average ages when rams attain 3/4-curl and full-curl horns are 5.7 years and 8.8 years, respectively. Average horn measurements at these ages are 27.0 inches and 35.9 inches, respectively. Horn growth data from throughout Interior Alaska suggest that low sheep density may correlate with high trophy quality.

Human use of this sheep population has been light. Harvest reports for which specific locations are noted show that only three sheep were taken in 1975, three in 1974 and one in 1973. The numbers of hunters afield were 10, 5 and 8, respectively. Thus, hunter success varied greatly, ranging from 12 to 60 percent. Most hunters have been residents and 90-100 percent of the harvest is taken by residents.

Liberal hunting seasons and bag limits prior to 1942 were followed by progressive restrictions which closed the area to sheep hunting from 1949 through 1954. In 1955 the present season of August 10 through September 20 was initiated. The legal bag limit since then has remained one 3/4-curl or larger ram per year.

User access is primarily by aircraft, despite the scarcity of landing sites. One unimproved strip near Lime Peak provides the closest access to sheep. Two private strips and several gravel bars along Beaver Creek are within walking distance of sheep habitat. In addition, float planes can land on small lakes north of Mt. Schwatka or on Beaver Creek near Victoria Creek during some years. Ground access is primarily from the Steese Highway; however, it is possible to approach the area via two trails to Beaver Creek from the Elliott Highway. The Steese Highway is closer to sheep range and has three mining access roads suitable for off-road vehicle use.

PROBLEMS

- * Loss of habitat may be occurring due to natural succession. Fire in adjacent climax conifer and deciduous forests would benefit the area by retarding the encroachment of forest upon the alpine areas.
- * Predation is a greater potential problem here than in most sheep ranges due to the scarcity of escape cover and the movements of sheep through forest situations to reach water, mineral licks or other patches of alpine habitat. The impact of wolf predation should be assessed periodically.
- * Access by ground vehicles will destroy the wild character of the area and may not be compatible with the goal of maintaining aesthetic hunting conditions. Off-road vehicle use of the area has not been extensive to date and should be restricted in the future.
- * Little is known of the current status of the sheep population. Periodic sex and age composition surveys should be conducted to determine the level at which the population could be harvested and the density of hunters that can be sustained.
- * Potential gravel and mineral deposits and two water storage sites may lead to development that is not compatible with the wilderness character of the area.

IMPACTS

- * Present use of the area is compatible with proposed management; however, increased demands on the sheep population in future years may result in regulations to restrict the number of hunters allowed in the area and their method of transport.
- * Users entering the area to view, fish or hunt wildlife will be faced with the same restrictions as sheep hunters.

6. TANANA HILLS SHEEP MANAGEMENT PLAN

LOCATION

In Game Management Unit 20, all drainages flowing into the south bank of the Yukon River between Circle and Eagle, all drainages of the North fork of the Fortymile River above its confluence with the Middle Fork of the Fortymile River, all drainages of the Salcha River above its confluence with Stone Boy Creek, all drainages of the North Fork of the Salcha River above its confluence with Rick's Creek, all drainages of the Chena River above its confluence with Wolf Creek, and all drainages into the South bank of the Coulombes Fork of Birch Creek and Birch Creek, south of the Steese Highway crossing and south of the Steese Highway between that point and Circle.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access and methods of transport to maintain aesthetic hunting conditions.
2. Control hunter numbers and distribution, if necessary, to distribute hunting pressure through the area.
3. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Dall sheep occupy about 1,420 square miles of alpine habitat in the Tanana Hills of eastern Interior Alaska. The most important sheep range is near the headwaters of the Charley and Seventymile Rivers, the East Fork of the Chena River, Birch Creek and the North Fork of the Fortymile River. About 285 Dall sheep occur in the Tanana Hills in small, scattered bands. There is evidently little interchange between sheep bands, and the population as a whole is isolated from other Alaska sheep populations. Local sheep bands often have distinctive coloration. Glacier Mountain sheep have black or dark-colored tails and frequently have dark hairs interspersed in their otherwise white coats. The genetic history of these populations and reasons for their distinct coloration are unknown. Tanana Hills Dall sheep habitat is limited because of the area's comparatively low elevation. Spruce forests encroach on sheep alpine habitat, and there are few rugged and steep rock outcrops typical of sheep range elsewhere in Alaska. Sheep often travel through timber to water and adjacent alpine areas. Numerous mineral licks and broad expanses of mountain slopes that are blown free of snow in winter, provide sheep easy access to forage. The area generally receives less precipitation than most other sheep ranges in Alaska. The effects of human activities in the Tanana Hills have been insignificant, and the area remains virtually an undisturbed wilderness. Some loss of sheep habitat may be occurring as a result of natural vegetation succession.

Although survey data are generally lacking, sheep numbers appear to be stable in the Tanana Hills, and there is no indication that the range is overgrazed. Aerial surveys of Glacier Mountain sheep indicate that rams with horns of three-quarter curl or larger constitute about 20 percent



of the population. An average of 18 percent of ewes have been accompanied by lambs in mid-summer on Glacier Mountain. The Tanana Hills area in general appears capable of sustaining high sheep densities, although current estimates of sheep per square mile of habitat (0.20) is the lowest on record for interior Alaska.

The rate of ram horn growth in the Tanana Hills indicates that the area is potentially capable of producing trophy sheep. Horn growth rate, although slower than for Wrangell Mountains sheep, is faster than for rams occupying the Brooks Range. The ages of ram with three-quarter and full-curl horns average 5.7 and 8.8 years, respectively, in the Tanana area. Horn measurements at these ages average 26 and 35 inches, respectively. Studies elsewhere in Alaska indicate that rapid horn growth is correlated with low sheep density.

Sheep losses to natural causes are unknown. Tanana Hills sheep may be vulnerable to predators due to the scarcity of steep slopes for escape and because they must traverse wooded areas.

Human use of Tanana Hills Dall sheep has been limited. An average of about 17 hunters per year reported killing three rams in 1975, nine in 1974 and none in 1973. Hunting success has varied from 0 to almost 50 percent. Sheep in the Tanana Hills occasionally move long distances and may not return to the same areas in successive years. These erratic movements may account partially for the considerable annual variation in hunting success. Most sheep hunters who use the Tanana Hills are Alaskan residents. Ninety percent or more of the Dall sheep harvest has been by residents. Planes are the most common means of access to the Tanana Hills, but few landing sites are available. There are improved airstrips along rivers, but these are generally too far from the sheep bands for practical use by hunters. Light aircraft can land on some ridges. Hunters also enter the area via the Charley River and by walking from the Taylor Highway starting at American Summit. Use of motorized vehicles or pack animals for transportation of hunters, hunting gear or game taken has been prohibited in the Glacier Mountain Management Area since 1971. Most hunters reach Glacier Mountain by embarking at Mile 140 of the Taylor Highway and walking ridgetops to the Management Area, a distance of about 20 miles. The current season of August 10 through September 20 and bag limits of one ram with three-quarter curl horns or larger date from 1955. The limited number of sheep taken from the area has had an insignificant impact on herd productivity. The number of three-quarter curl and larger rams has been significantly reduced in some local areas, such as Twin Mountain.

PROBLEMS

- * Problems related to hunter access may develop in future years. Increased use of ORV's could adversely affect the area's wilderness character and could be incompatible with management goals to provide aesthetic hunting. Logistical support for guided hunts may lead to greater air traffic in the area. Difficult and limited means of access, however, currently cause hunters to concentrate. The Department may consider developing means and points of access to equitably distribute hunters that would not alter the wilderness aspect of the Tanana Hills. The Department will also encourage guiding efforts that are consistent with management goals and will regulate undesired activities. Two proposed highways, from Circle to Eagle via the north side of the Tanana Hills and from Fairbanks to Eagle through the Salcha and Seventymile River drainages could lead to increased use of the area. If these roads are constructed, the Department will consider more restrictive regulations to maintain the area's aesthetic qualities. The Department will also make recommendations regarding placement and construction of the highways to reduce adverse impacts on Tanana sheep.



- * Little is known of the status of sheep populations in the Tanana Hills. Periodic sex and age composition surveys should be conducted to determine the allowable harvest and the density of hunters that the area could sustain.
- * Gravel and mineral deposits and water storage sites may lead to development that is incompatible with the area's wilderness character. Asbestos mining may occur in the Glacier Mountain area. A proposed dam on the Yukon River at the mouth of Woodchopper Creek would back water into the Charley River drainage to the detriment of sheep that frequent the river bluffs. Critical habitat, including sheep migration routes, travel lanes, and mineral lick sites, should be immediately identified by the Department. The Department may recommend legislative action to protect important sheep habitat in the area.
- * The proposed Charley River Wild and Scenic River area and Native Regional Deficiency withdrawals may lead to restrictions on use of portions of the Tanana Hills. The Native Regional Corporation may select from lands in the vicinity of Mount Sorenson, Arctic Dome, Mount Eldridge and Glacier Mountain. The Department should solicit the cooperation of private landowners to facilitate progressive management of sheep. Easements across private lands to public lands will be sought as provided for in the Alaska Native Claims Settlement Act. Cooperative agreements with appropriate federal agencies should be sought to allow hunting to continue in the Charley River area if that proposal is approved.
- * Predation on Dall sheep is potentially more serious in this area than elsewhere due to the lack of escape cover and the proximity of timber. The impact of wolf predation should be assessed periodically.
- * Loss of sheep habitat is occurring due to natural vegetation succession. Fire in adjacent forests would probably benefit sheep by retarding forest encroachment on alpine areas.

IMPACTS

- * Current use of the Tanana Hills is compatible with proposed management. Greater demands on sheep in future years, however, may require restrictions of the number of hunters and their methods of transport.
- * Users of the area for viewing, fishing or other activities will be affected by the same restrictions imposed on hunters.

7. WRANGELL-MENTASTA MOUNTAINS SHEEP MANAGEMENT PLAN

LOCATION

The Wrangell and Mentasta Mountains in Game Management Unit 12 and that portion of Game Management Unit 11 lying to the east of Boulder Creek and north of Mt. Wrangell.

MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Maintain minimal restrictions on hunter access and methods of hunter transport.
2. Maintain the sheep population in balance with its habitat, if possible.
3. Discourage land use practices that adversely affect important sheep habitat.

THE SPECIES

The Wrangell-Mentasta Mountains contain some of the best sheep habitat in Alaska, and as a result some of the largest sheep populations are located in this area. An estimated minimum population of 6,500 sheep inhabit the area. Sheep populations of highest density appear to occur near Wiki Peak near Ptarmigan Lake in the Wrangells and from Noyes Mountain southeast to the Nabesna River in the Mentasta Mountains.

Production of lambs appears to be high throughout the Wrangell-Mentasta Mountains, although survival rates to two years of age are generally unknown. Limited surveys indicate fluctuations in lamb survival rates from year to year. Recognizable rams comprise between 17 and 32 percent of various populations in the area.

The Wrangell and Mentasta Mountains have long been popular sheep hunting locations. Annual harvests have ranged from about 120 to 225 sheep, with about 70 percent of the kill occurring in drainages of the Nabesna River and in the vicinity of Ptarmigan Lake. In recent years approximately 400 hunters have reported hunting in the area. Three-fourths of the hunters are residents, and their success rate is about 33 percent. Nonresident hunters who are required to employ guides, have a hunting success of 75 percent.

Harvests have reduced the percentage of legal rams in the population and the availability of large horned rams. This is particularly obvious in the Nabesna River drainage and part of the Wiki Peak area, both of which support most the sheep harvest. However, there are portions of the area that receive little hunting pressure and have a relatively large number of large horned rams in the population. As hunting pressure increases it is expected such areas will receive more hunter effort and will exhibit corresponding reductions in proportions of large rams.

Hunter access is primarily by means of aircraft and all terrain vehicles, although horses are used in the Chisana and White River drainages and, around Beaver Creek. All terrain vehicles are used in the Mentasta Mountains, particularly on the southwest side; aircraft are the common



access vehicle in other areas. A limited number of airstrips are available in the Wrangell-Mentasta Mountains, although some gravel bars are adequate for airstrips. Access in some areas, such as glacial regions and much of the Wrangells north of Beaver Creek, is limited to walking. Access from the road system is confined to the Mentasta Mountains where hunters walk from the Nabesna Road.

PROBLEMS

- * Establishment of a Wrangell-St. Elias National Park may substantially reduce hunting opportunity in the area by restricting or eliminating sport hunting or excluding certain access means. The Department should advocate continued sport hunting in this important hunting area to the extent that it does not conflict with other important uses of the area.
- * An expansion of mining activity in the Chisana area could result in excessive disturbance to sheep and possible abandonment of some range. The Department should delineate areas and advocate protection for critical sheep habitat, and propose limitations on resource development to minimize impacts on sheep through agreements and coordination with the land managing agencies.

IMPACTS

- * The proportion of large rams in the populations will decrease, but productivity of populations will remain high.
- * Without regulation crowded hunting conditions may occur in areas with good access.

8. TOK SHEEP MANAGEMENT PLAN

LOCATION

In Game Management Units 12 and 20, the area known as the Tok Management Area.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Limit the harvest of rams to those with full-curl horns.
2. Control the number and distribution of hunters to distribute hunting pressure through the area and to maintain the harvest at desired levels.
3. Control access and methods of hunter transport to maintain aesthetic hunting conditions.
4. Harvest ewes to maintain the sheep population in balance with its habitat.

THE SPECIES

An estimated 1650 sheep inhabit the Tok area. Productivity of the population and survival of lambs are high. Surveys in 1975 indicated 40 lambs per 100 ewes and 32 yearlings per 100 ewes. Rams with three-quarter curl horns or larger comprise about nine percent of the population (150). The population is capable of producing large numbers of large rams in a relatively short time. It is not unusual to find eight-year-old rams that have full-curl horns. Based on studies of other Alaskan sheep populations, about 50 rams may enter the full-curl category annually. Little is known of the relative importance of natural mortality factors or condition of the range. Based on observed lamb production and survival rates, the range seems in good condition. The sheep population is probably increasing throughout the Tok area.

The Board of Fish and Game created the Tok Management Area in 1974 to provide hunters with an area containing large-horned sheep and uncrowded, high-quality hunting conditions. The eastern end of the Alaska Range was chosen for its healthy, growing sheep population, good accessibility by various transportation modes including walking, and a low number of guides using the area. The regulations included ewe hunting to provide for control of the sheep population size and adjustment of the sex ratio. The population appeared capable of producing 30 full-curl rams annually and regulations were promulgated to achieve this harvest. In 1974, 60 permits were issued for rams and 60 were issued for ewes. Only five rams and nine ewes were taken, a success of 8 and 15 percent, respectively. In 1975, 120 ram permits were issued, resulting in 29 successful hunters out of 67 permittees who actually hunted. No ewes were harvested during 1975, although 10 permittees reported hunting.



Transportation into the area has been by air, foot, off-road vehicles and horses, with most people using aircraft or walking. Off-road vehicles have been popular along the Tok River, where horses have also been used to a limited extent. Some small, gravel bar airstrips are present in the Robertson and Johnson Rivers; in the Tok drainage only 2 or 3 such strips are present. There are no landing areas (for wheel-equipped planes) in the Dry Tok River drainage. Burnt Lake, in Sikosina Pass, can also be used by float planes. Most walk-in hunters use the Yerrick Creek-Sheep Creek-Clearwater Creek areas. This section receives fairly heavy foot traffic along with pressure from off-road vehicle and aircraft users via the Tok River. Hunters in the Dry Tok must hike from Burnt Lake or use horses or off-road vehicles. The Tok area has traditionally been used by Alaska residents. Four guides used the area prior to establishment of permit restrictions. Now only one guide regularly hunts there, although others are free to do so provided their clients possess permits. Nonresidents are restricted to no more than 10 percent of the available permits under current regulations.

Sheep can frequently be observed during May and early June from the Tok Cutoff between Mile 91 and Mile 85 as the animals feed on new vegetation along the cliffs bordering the highways. Few animals are located here at other times of the year, however.

PROBLEMS

- * Misuse of certain transportation modes, primarily aircraft and off-road vehicles, has resulted in competition between and complaints from a number of hunters. While many would like to see all transportation modes except walking disallowed in the Tok area, the area is too large for such a restriction and many portions would remain unhunted while other sections would receive excessive pressure. The Department may establish transportation corridors and designated landing areas. This does not eliminate the problem of unethical use of aircraft for spotting or hazing or disturbing other hunters but such practices would be reduced.
- * A number of hunters who formerly hunted in the Tok area before special management was invoked resented the restrictions imposed by a permit system and have continued to hunt there without permits. Increased enforcement efforts are required to curtail noncompliance with regulations.
- * Public and political opposition to the hunting of ewe sheep may force cancellation of either-sex hunts and hinder current research programs in the area. The Department should conduct a public relations program to explain the benefits to be derived from either-sex sheep harvests.

IMPACTS

- * Proposed management is essentially that which exists on the area currently. No major changes in characteristics of use or effects on the sheep population are expected.
- * Some regulation of transport method should achieve a better distribution of the harvest and reduce conflicts between hunters.

9. DELTA SHEEP MANAGEMENT PLAN

LOCATION

Game Management Unit 20D and that portion of Game Management Unit 20A lying east and south of McGinnis Glacier and Creek.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Regulate access and methods of hunter transport to accommodate walk-in hunters.
2. Control number and distribution of hunters, if necessary, to distribute hunting pressure through the area.
3. Limit the harvest of rams.
4. Allow ewe harvests, if necessary, to maintain the sheep population in balance with its habitat.
5. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Dall sheep in the Delta area number approximately 1500 animals. The population size appears stable, despite high production and good survival of lambs to yearling age (usually indicative of a growing population). Sheep habitat is apparently in good condition. Predation may be limiting population growth in the area. The proportion of rams in the population has been reduced by hunting and now stands at about 7 percent. Legal ram recruitment may be reduced, at least for the 1976 season, due to the severe winter of 1970-71.

Since 1968 an average of 191 hunters have taken an average of 51 sheep per year in the Delta area. Hunting success has averaged 27 percent annually. More than 90 percent of the hunters are Alaskan residents. About half of the hunters come from Fairbanks, 20 percent from Delta Junction, and 20 percent from other areas in Alaska. From 1971 to 1974 use of the area was equally distributed between walk-in hunters and vehicular users by imposing restrictions on the use of vehicles during the latter part of the season. In 1975 vehicular access was prohibited and only walk-in hunters now use the area. Currently sheep in the remote and inaccessible areas such as July Creek and the Johnson, Gerstle and Little Gerstle Rivers sustain only 19 percent of the harvest while sheep in the accessible Granite Mountains and the Alaska Range adjacent to the Richardson Highway support 81 percent.

Hunting has affected the availability and size of rams in the population. Average horn size of rams harvested has declined from 35.2 inches in 1968 to 30.6 inches in 1975. Hunting effort or success would have to be reduced if an increased proportion and size of rams in the population is desired.



PROBLEMS

- * Mineral exploration and development on or near mineral licks or other important sheep habitat could have a detrimental effect on the sheep population. Coal development near the Gold Creek sheep lick is a possibility. Mineral licks should receive critical habitat designation. Mining activities on important winter ranges, lambing areas, and travel routes should be regulated to minimize adverse impacts to sheep.
- * The introduction of disease and parasites by domestic animals, particularly domestic sheep, may develop with more agriculture in the Tanana Valley. Other wild ungulates such as moose and caribou, predators such as wolves and coyotes, and scavengers such as ravens, could carry diseases from domestic stock to the wild sheep population without domestic sheep encroaching on Dall sheep range. Extended quarantines for incoming livestock and more comprehensive disease testing would reduce that threat. Grazing permits for lands on or adjacent to sheep range should not be allowed.
- * Illegal kills are a constant problem in the area. Ram losses to illegal hunting probably average 10 percent of the legal harvest per year. More intensive enforcement is required to reduce illegal take.
- * During the sheep hunting season, a vehicle parking area shortage exists along the Richardson Highway and creates traffic safety problems. More off-highway parking areas would reduce the danger to motorists.

IMPACTS

- * Limitations on the number of rams harvested will increase the average size of rams in the population.
- * Distribution of hunters through the area by means of permits will reduce congestion of hunters.
- * Vehicular restrictions will apply to hunters of other species in the area.
- * Mining activity may be regulated in the mineral lick areas and other important sheep habitat.
- * Domestic livestock use of sheep range will be discouraged.



10. CENTRAL ALASKA RANGE SHEEP MANAGEMENT PLAN

LOCATION

That portion of Game Management Units 20A and 20C bounded on the east by the Delta River downstream from McGinnis Creek, on the north by the Tanana River, on the west by the Nenana River and on the south by the crest of the Alaska Range as far east as McGinnis peak down the western limit of the McGinnis Glacier and the north bank of McGinnis Creek to the Delta River.

MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to distribute hunting pressure through the area and to maintain the harvest at desired levels.
2. Discourage land use practices that further degrade the wild character of the area.

THE SPECIES

Sheep which inhabit the Central Alaska Range exist in discrete populations, each of which has its well-defined traditional ranges. Based on aerial surveys, the number of sheep in the area is estimated to exceed 5,000. In the past numbers of sheep were probably much lower than they are now. Sheep populations in the area probably followed similar patterns of fluctuation to those of McKinley Park sheep which experienced drastic reductions in 1929 and 1932. Current densities of Dall sheep are high but the sheep are lower in vigor and size than almost anywhere else in the state. It is not known whether this is inherent in the sheep or a result of poor range conditions. At the present time populations are either stable or in a slight decline which is probably related to weather patterns of recent years. The sheep-habitat interactions present in the Central Alaska Range are not ideal for producing trophies; in fact, this area is among the poorer trophy production areas in Alaska.

Most natural mortality of sheep is caused by weather, predation, and disease. Predation influences are not known, but are thought to be minimal under normal conditions. The influences of weather are most apparent in production of lambs, and sometimes adverse winters result in the loss of a lamb crop. Population structure and the number of harvestable rams in the population are influenced by the weather events of five to six years before. It is not unusual to have poor lamb survival every five or six years.

Sheep in the central Alaska Range have been heavily hunted for the last nine years. Hunter numbers have ranged from 220 in 1968 to 312 in 1972 and have averaged about 225. An average of about 110 sheep are killed each year. This harvest is about two percent of the total population. Recently the percent of legal rams in the herd has been low, near three percent. Horn length has decreased over the last 8 years from an average of 34 inches to an average of 32 inches, and average age of sheep harvested has declined from about 8 years of age to about 6 years of age. All these measures indicate that hunter pressure in the area is intense.

About 1600 man days of recreation are expended annually by sheep hunters in this area and the average man days for each sheep harvested is 13.1 days. Use of the hunting area is primarily by resident hunters (about

80 percent) who reside in interior Alaska. Guiding effort is significant in the area and guided hunters usually take about 30 percent of the harvest even though they comprise only about 20 percent of the hunters. There is little nonconsumptive use of Dall sheep in the area except for the Healy-Lignite closed area. The hunting season has been unchanged in the area since statehood, and most of the harvest occurs early in the hunting season. There is no subsistence hunting in the area although some users hunt primarily for sheep meat. The heavy exploitation of rams in this area has led to fewer available trophies, compounded in recent years by the poor lamb production of five to seven years ago. Virtually all sheep hunting is with the aid of aircraft. Some guides use horses, but clients usually are flown to base camp. Some off-road vehicles are used and established trails exist.

PROBLEMS

- * Only limited mining and prospecting activity has occurred in this area, but the frequency of such activities is greatly increasing. Development of additional coal deposits, particularly in the western end of the area, and of numerous gravel deposits will lead to habitat degradation. Some environmental damage is also noticeable from the unregulated use of off-road vehicles. The Department will discourage unregulated mining activity and will advocate confining off-road vehicles to existing traditional routes of access to prevent habitat destruction. It is important to protect the Dall sheep mineral licks from disturbance and development. These licks serve as centers of Dall sheep movement and dispersion and are essential to their continued well being.
- * Claims by private individuals to aircraft landing strips developed on public lands reduce use of strips by the general public. The legal status of landing strips not located on patented land should be made known to hunters and general public use of these sites should be encouraged. The Department will discourage development of additional private landing strips on public land.
- * Cantwell native land selections made under terms of the Alaska Native Claims Settlement Act and establishment of a McKinley cooperative planning and management zone may result in restrictions on hunter access and use of the Yanert River. The Department should solicit the cooperation of private landowners to facilitate progressive management of sheep. Easements across private lands to public lands will be sought as provided for in the Alaska Native Claims Settlement Act. The Department will cooperate with other state and federal agencies on mutually compatible management of the proposed McKinley cooperative planning and management zone east of the existing Park boundary, but not to the exclusion of compatible beneficial uses.

IMPACTS

- * Ram abundance will continue to fluctuate with the success of each lamb crop. Rams will continue to be harvested at ages close to the age when they become legal.
- * Lamb production will continue at about present levels.
- * Restrictive regulations would be limited to those required to prevent further degradation of the sheep habitat.
- * The Healy-Lignite closed area near the Usibelli coal mine will continue to provide the opportunity to observe and photograph sheep under winter conditions.
- * The goal of maximizing the opportunity to hunt Dall sheep may prohibit simultaneous seasons with moose and grizzly bears in cases where management of these species requires uncrowded hunting conditions.



In Northwestern Alaska Dall sheep (*Ovis dalli*) inhabit the DeLong Mountains from Howard Pass to the western Wulik Peaks. Distribution is not continuous and sheep populations may be separated by several drainages. The influences of coastal weather may make habitat in Northwestern Alaska marginal for Dall sheep. The total population in the region is estimated to be about 1,500 sheep.

Dall sheep are usually found in alpine habitat. During summer they occupy relatively large areas. Mineral licks are an important component of sheep habitat in summer. Many important mineral licks are known throughout the Brooks Range, but few have been identified in Northwestern Alaska. Sheep, especially ewes with lambs, will frequently travel several miles to use mineral licks where they eagerly eat the mineral rich soil. The exact nature of sheep dependence on mineral licks is not fully understood. The use of mineral licks also serves to intermingle otherwise discrete populations and is of importance in maintaining genetically healthy herds.

Winter ranges are the third critical component of Dall sheep habitat. Winter ranges are characterized by windblown ridges or slopes. These ranges usually occur at the mouths of tributaries along major drainages where prevailing winds clear winter snow from forage. A herd occupying many square miles of summer habitat may be restricted to, and limited in size by, a winter range of relatively few acres. Some herds occupy winter ranges which are several miles from their summer ranges and migrate between the two. These seasonal migrations often include side trips to utilize mineral licks, and are the ingrained tradition of each population. Sheep are extremely loyal to their traditional summer ranges, winter ranges and mineral licks and appear on these ranges at about the same time each year.

Predation in Northwestern Alaska does not appear to be a major factor in limiting sheep numbers, however occasional situations arise where predation may depress sheep numbers. Wolves are the main predator on sheep, but wolverines, bears and sometimes eagles have been known to take sheep.

Dall sheep in Northwestern Alaska are used for nonconsumptive wilderness values and for consumptive recreational and domestic utilization. In recent years the recreational harvest in Northwestern Alaska has averaged less than 20 rams and hunter success has averaged about 50 percent. About half of the harvest has been by nonresident hunters. Domestic use of Dall sheep has played a minor but continuing role; such use has been limited and nontraditional. It is difficult to assess the future trends of hunter pressure and harvest in Northwestern Alaska, but hunter effort will probably increase.

PROBLEMS

- * Expanding human land use may adversely affect sheep through the alteration of important habitat or through disturbance of sheep use of critical areas. Mineral licks, winter ranges, lambing areas, and migration routes are particularly susceptible to damage or interference from such activities as mining, construction in transportation and utility corridors, and development of alpine recreation sites. Critical habitats must be protected from alteration or undue disturbance.
- * Increases in numbers of hunters, development of access, and improved transport methods have reduced availability of legal rams, even in



once-remote and lightly hunted areas. In some locations most legal rams are removed annually. In some areas the average size of rams available to hunters has decreased. In addition to reduced hunter success, increased hunting pressure has lowered the quality of the hunting experience. Management measures to regulate hunter density and distribution, and to increase the number of legal rams available to hunters should receive greater emphasis.

- * The small, isolated nature of sheep populations in Northwestern Alaska makes these populations especially vulnerable to uncontrolled harvest situations. Enforcement of regulations limiting harvests to allowable levels and to specified sheep population segments and the cooperation of local residents will be necessary to maintenance of current sheep populations in the region.

3. SOUTHERN BROOKS RANGE SHEEP MANAGEMENT PLAN

LOCATION

Game Management Units 24, 25 and that portion of 23 which includes the drainages of the Noatak River above its confluence with Mayumerak Creek.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control the number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions.
2. Limit the harvest of rams to no more than the annual increment of three-quarter curl rams.
3. Discourage land use practices that adversely affect the wilderness character of the area.

THE SPECIES

Sheep which inhabit this large area exist in discrete populations each of which has its well-defined traditional ranges. The entire extent of the area included in this plan has never been completely surveyed for Dall sheep so the actual number of animals present is not known. Based on limited aerial surveys, the number of Dall sheep in this area is estimated to be at least 7,500. There is little doubt that Dall sheep numbers fluctuate and that there may be declines or increases in the future, but these fluctuations are not expected to be extreme. Unless exceptionally adverse conditions occur, sheep population numbers will probably continue to fluctuate near present levels.

Most natural mortality is caused by weather and predation. The influences of predation are not known, but are thought to be minimal under normal conditions. The influences of weather are most apparent in lamb production and sometimes result in the loss of a lamb crop. Where hunter pressure is light, as it has been in much of the southern Brooks Range, weather influences on trophy production are not readily seen because of the standing stock of trophies on the range. In much of the southern Brooks Range trophy availability is good. This high availability of trophies results from the presence of lightly hunted populations containing relatively large numbers of old rams. A few areas with good access have received high hunter pressure in the last few years.

The southern Brooks Range has received an increased amount of use in the 1970's, but the number of hunters appears to have leveled off in the past 2 to 3 years at about 200 hunters per year. These hunters harvest about 115 rams per year. About 65 percent of the hunters are residents and they take about 55 percent of the harvest. In the past few years there has been a trend toward increased hunting by residents in the area. About 1,000 man days are spent hunting sheep in the southern



Brooks Range each year. Some domestic utilization by local residents occurs in the area, but it is limited and represents the opportunistic taking of sheep rather than an actual dependence on them as a food item. Nonconsumptive utilization of sheep in the southern Brooks Range occurs, but the extent to which it is incidental to other activities is not known. Many big game guides and outfitters have interests in this vast area. They are responsible for about 45 percent of the Dall ram harvest each year. Some guide operations have permanent facilities in the area.

PROBLEMS

- * Important Dall sheep habitat including mineral licks, lambing areas and winter ranges may be adversely affected by resource development. Mining and prospecting activity has been present in the area for many years, but recent developments have stimulated increased interest in utilization of non-renewable resources. The Department should identify important sheep habitat and should encourage regulation of resource development to minimize adverse impacts to sheep habitat.
- * The lack of enforcement of hunting regulations for residents of the area presents a potential for abuse. As demands on sheep in the area increase, the allowance for unregulated use will decrease. Enforcement of existing regulations will be necessary to avoid excessive use of sheep and to assure all users equal opportunity under the law.
- * Establishment of proposed "4 systems" areas such as the Noatak National Ecological Range, Gates of the Arctic National Park, and the additions to the Arctic National Wildlife Range may exclude or limit hunting in the southern Brooks Range. Additional large tracts of land will be transferred to private ownership under terms of the Alaska Native Claims Settlement Act and such lands may be closed to public hunting. Exclusion of hunting in some areas will result in concentrations of hunters in other areas, causing deterioration of aesthetic hunting conditions. Increased hunting pressure is also expected when the pipeline Haul Road is opened for public use. The Department will attempt to maintain public hunting over as wide an area as possible by participating in land use planning and coordinated management with other agencies. The Department should solicit the cooperation of private landowners to facilitate progressive management of sheep. Easements across private lands to public lands will be sought as provided for in the Alaska Native Claims Settlement Act. Densities of hunters may be controlled by use of permits.

IMPACTS

- * Hunter density will be limited by permits when crowded hunting conditions occur.
- * Large rams will be available to hunters.
- * Methods of hunter transport will be limited to those necessary for access to the hunting area.
- * Utilization of the sheep resource by some big game guides will be restricted to the extent that clients can obtain permits.
- * Viewing and photographing sheep in wilderness surroundings will be enhanced.
- * Resource development activities may be limited in time or area and expense of operations may be increased.

4. WESTERN BROOKS RANGE SHEEP MANAGEMENT PLAN

LOCATION

The portion of Game Management Unit 23 draining into the Kobuk River and the drainages into the Noatak River below Mayumerak Creek.

MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, distribution of hunters and methods of hunter transport if necessary to distribute hunting pressure through the area.
2. Discourage land use practices that adversely affect sheep habitat.

THE SPECIES

Sheep in this area can be separated into three distinct geographical populations: those in the drainages of the upper Kobuk River; those in the Baird Mountains south of the Noatak River; and those in the Delong Mountains, north of the Noatak River. The total sheep population in the area is estimated to be 700. While the Kobuk drainage appears to be good habitat, it contains relatively few sheep. The area has not been thoroughly surveyed, but it is estimated to support only 150 animals. The Baird Mountain region is sparsely populated, with most sheep occurring in the western portion. A cursory survey in 1974 revealed 44 sheep, but the area is estimated to contain 150. Sheep inhabit a relatively large area in the Delong Mountains from the Wulik River in the west to the Nimiuktuk River in the east, but density is low. The area is estimated to contain 400 animals.

Presently sheep are about one-half their former numbers in the Western Brooks Range. Information indicates that the sheep population began to decline in the early to mid-1960's and has continued to do so. The decrease does not seem to be a result of hunting alone, but more likely is a combination of several factors. These include range conditions, weather, predation and subsistence hunting.

A fall survey in 1974 revealed that lambs comprised about 24 percent of the population in the Western Brooks Range and 17 percent in an area near the upper Kobuk River. For the population as a whole natural mortality is estimated to be about 6 to 9 percent annually.

It appears that sheep distribution has shrunk during the last three decades. Although the causes are uncertain, sheep habitat in the Western Brooks Range is marginal, perhaps because of its proximity to the arctic coastal environment. When sub-populations are extirpated, recolonization apparently occurs very slowly. Even with good lamb survival it is not likely that the population will expand quickly.

Considering the size of the land mass, hunting pressure has been relatively light, but due to the limited number of aircraft landing sites, pressure has been high in localized areas. The greatest number of hunters have concentrated on the main tributaries of the Noatak River in drainages of the Eli, Kelly and Kugurorok Rivers. Reported annual harvests in the area have averaged about 8 rams for the last 10 years. In recent years



there has been a slight increase in hunting pressure which is not entirely reflected in the harvest statistics because hunter success has been lower. Local residents have taken most of the harvest, but a few nonnatives using the services of a guide have also been successful. Wheeled or float-equipped aircraft have been the transportation means used most often, in about equal proportions. Average walking distance from the point of landing to where the sheep were killed has probably averaged less than five miles. Hunter success has been greater than 60 percent for both residents and nonresidents.

Twenty or thirty years ago local hunters probably killed 3 to 4 times (or more) as many sheep as did recreational hunters. With few exceptions this kill occurred outside the legal hunting season and included all sheep regardless of age or sex. This practice continues today but now domestic use more nearly equals the recreational harvest. The vast majority of this kill still occurs outside the open season, usually when the sheep are on their wintering grounds and can be reached with the aid of a snowmachine. The greatest number of sheep taken by domestic hunters come from the drainages of the Wulik, Kivalina, and lower Noatak Rivers.

PROBLEMS

- * The practice of taking sheep outside established seasons and bag limits hinders any sound management program. Enforcement efforts should be increased, and the Department should explain to local domestic hunters the reasons for established regulations and the necessity for all users to comply with them.
- * Much of the area has not been surveyed, and necessary data are lacking on sheep numbers, composition, and distribution. The Department should increase survey and inventory activities to acquire information necessary for management.
- * The western Brooks Range is highly mineralized, and will probably receive increased attention from mining interests. Development could be detrimental by disturbing sheep at critical times or adversely affecting important sheep habitat. The Department should closely monitor exploration and development and should recommend measures to minimize adverse consequences of resource development.

IMPACTS

- * Regulations which may be implemented to distribute hunting pressure more evenly may limit the freedom of individuals to hunt when and where they choose.
- * Hunting pressure can be expected to increase.



Dall sheep (*Ovis dalli*) occupy alpine portions of all major mountain ranges in Southcentral Alaska. An estimated 2,000 sheep inhabit the Kenai Mountains north of Kachemak Bay and west of the Sargent Ice Field. About 3,000 sheep occupy the northwest and north slopes of the Chugach Mountains between Anchorage and the Canadian border, while another 3,000 are found in the Talkeetna and Watana Mountains. About 10,000 sheep inhabit the Wrangell Mountains, of which only the southwestern slopes are included in the Southcentral area. Approximately 2,000 sheep reside in the Alaska Range southwest of McKinley Park, however, only a relatively small part of this herd occupies the southeastern slopes which are included in the Southcentral region. These sheep are found primarily west of the Skwentna River and from Lake Clark Pass north to the Yentna River in those mountains protected from the heavy coastal snowfall by intermediate ranges. Sheep generally do not occupy the remaining south slopes of the Alaska Range, the south slopes of the Chugach Range, nor the eastern Kenai Mountains due to heavy accumulation of snow.

Like most northern ungulates, Dall sheep populations are subject to fluctuations in abundance. Numbers were reportedly high in the early part of this century. A major decline occurred in the 1930's and early 1940's, probably as a result of unusually severe winters, which left sheep herds throughout the state at low levels. Herds increased again throughout the 1950's and 1960's. Although data are not available for all populations, it appears that sheep numbers in Southcentral Alaska peaked in about 1968 and have been stable or declining slowly since then. Sheep populations are probably near the carrying capacity of winter ranges and may be expected to remain relatively stable or to decline with the occurrence of abnormally severe winters.

Dall sheep usually occupy alpine habitats. During summer, they occupy relatively large areas of their annual range and remain almost entirely above brushline. Alpine meadows and slopes are used for feeding and resting, while nearby cliffs or large rocky outcrops are required for escape cover. By early November, sheep begin to congregate on their winter ranges. These are areas of limited size where forage is available throughout the winter on windblown ridges or slopes, and where cliffs and outcrops are available to enable escape from predators. A herd occupying many square miles of summer habitat may be restricted to, and limited in size by, a winter range of relatively few acres. Some herds occupy winter habitats several miles removed from their summer range and migrate between the two, sometimes following traditional routes leading across timbered valleys. Breeding takes place from mid-November through early December.

With the beginning of snow melt in spring, most sheep move down from their windswept wintering grounds to the lower, south-facing slopes where green plants first emerge. At this time, they may be found down in alders and near the upper limits of timberline, much lower than at any other season.

Lambing occurs in May and early June. Parturient ewes seek isolation in the most rugged cliffs available to give birth to their single lambs. Escape terrain is particularly vital at this time to protect the comparatively immobile mothers and newborn young from disturbance and predator attack. Upon completion of lambing, the ewes and young follow the retreating snowline upward and move onto summer ranges. Rams may precede ewes by several weeks in moving to summer range.

Subsequent to lambing, sheep use natural mineral licks extensively. A number of such licks are well known in this region and others undoubtedly exist. Sheep, especially females and young, will frequently travel several miles over well-worn trails to congregate in mineral licks where



they spend hours eating the mineral-rich soil. Use of licks is heavy in early summer and gradually lessens as summer advances. Natural mineral licks are apparently of extreme importance to many sheep, although mineral requirements are not yet clearly understood. Some herds apparently do not have access to mineral licks and may substitute the use of certain plant species to obtain the required minerals.

Dall sheep are primarily grazing animals; bunchgrasses, particularly alpine fescue, and sedges make up the majority of their annual diet. These are supplemented by smaller amounts of browse such as alpine willow. Various forbs are consumed during summer, while lichens become important quantitatively in winter.

Climate is the most important factor regulating sheep numbers and distribution. Deep, dense snows prevent sheep from reaching winter forage and are important in limiting sheep distribution, particularly in the southern limits of Dall sheep range where heavy snow accumulations occur due to maritime influences. Sheep require relatively light snowfall and wind to survive during winter. Cold temperatures keep the snow powdery and soft, allowing winds to remove it from ridgetops and slopes, exposing winter forage. Warm winters or thaws result in dense, crusted snow which the sheep cannot dig through nor the wind remove. By late winter, sheep are often restricted to small areas of exposed, wind-scoured, low-quality vegetation which provides less nourishment than is used in daily activities. Sheep then survive partially by metabolism of stored body fat and tissue. If spring arrives late, body reserves may be used up and mortality occurs. Exceptionally severe winters, such as those which occurred in the early 1940's, have been the only factor known so far to have caused major "crashes" in Dall sheep.

Overwinter survival of lambs is normally low in comparison to adult sheep and severe winters depress it further. Newborn lambs are particularly susceptible to adverse spring weather such as cold wind, rain, or snow during the critical lambing period. Summer weather, while not as critical as that in winter, is also important in providing an adequate growing season and enough forage to enable sheep to store sufficient body fat for survival during winter.

Predation does not appear to be important in population control except under exceptional circumstances, such as when deep snows force sheep to feed far from protective cliffs. Parasites, diseases and accidents also take their toll, but apparently are usually of minor importance.

Sheep were originally hunted for subsistence and the market during the early days of Alaska's settlement but they now are taken primarily by recreational hunters. Traditionally, only mature rams with horns of 3/4 curl or greater configuration have been legal game during an August-September season. Dall sheep are recognized worldwide as one of North America's outstanding trophy animals, and they are an important sport-hunted species in Southcentral Alaska.

Sheep harvests in the area have been characterized by increases in numbers of hunters (about 1,890 in 1974) and slight decreases in number of rams taken (1967-1974 average of 463 rams). Success has slowly decreased with 27 percent of sheep hunters successful in 1974. About 30 percent of the harvest has been taken by nonresidents, who presently make up only 20 percent of the hunters. Their greater hunting success is probably attributable to the requirement that nonresidents must be accompanied by a guide while sheep hunting. Success of all hunters would undoubtedly be lower, were it not for the use of mechanized off-road vehicles, including aircraft, that are used for transport to otherwise inaccessible hunting areas.

The hunting pressure in Southcentral Alaska is causing a decline in the number of large rams in some herds even though adequate breeding stocks



remain. Increasing numbers of hunters are competing for a relatively stable or declining number of legal rams. Under these circumstances decreasing size and numbers of trophies taken and reduced hunter success can be expected.

While ram-only hunting harvests do not control sheep populations, carefully regulated, experimental either-sex hunts have proven feasible in controlling herd numbers. These provide more animals for harvest while apparently increasing lamb production and survival. Such intensive management may become necessary as hunting pressure increases.

Nonconsumptive uses of Dall sheep also are important. Two areas in the region are currently protected from all sheep hunting in order to provide easily accessible and relatively natural sheep herds for public viewing, photography and scientific study. These are at Sheep Mountain on the Glenn Highway and Cooper Landing on the Kenai Peninsula. Both are popular with tourists and residents alike.

PROBLEMS

- * Expanding human land use may adversely affect sheep through the alteration of important habitat or through disturbance of sheep use of critical areas. Mineral licks, winter ranges, lambing areas, and migration routes are particularly susceptible to damage or interference from such activities as mining, construction in transportation and utility corridors, and development of alpine recreation sites. Critical habitats must be protected from alteration or undue disturbance.
- * Increases in numbers of hunters, development of access, and improved transport methods have reduced availability of legal rams, even in once-remote and lightly hunted areas. In some locations most legal rams are removed annually. In some areas the average size of rams available to hunters has decreased. In addition to reduced hunter success, increased hunting pressure has lowered the quality of the hunting experience. Management measures to regulate hunter density and distribution, and to increase the number of legal rams available to hunters should receive greater emphasis.
- * Limitation of use to rams of 3/4 curl or larger has had little significant effect on population size or trend, even in areas where most legal rams are removed by hunters. Thus, ram harvests are of little utility to management where population control or productive manipulation is desirable. The effect of 3/4 curl management has been to create a strong imbalance in sheep sex ratios in many herds. Since some sheep populations are near the carrying capacity of the range and may be declining in some areas, the strong imbalance in sex ratios coupled with heavy hunting pressure results in few rams being available to hunters. Additionally, since relative densities of sheep populations are high, the production and survival of lambs is low. Low lamb survival results in relatively few legal rams being recruited into the population. Management of harvests providing the option for either sex hunting could benefit use significantly as well as benefit the resource. Harvests of either sex would allow for more animals to be taken. Reduction in population density could improve lamb production and survival, as well as decrease potential adverse impacts of severe winter weather on the total population. Increased production and survival of lambs would offset larger harvests and would increase the recruitment of rams to the population.



7. WRANGELL-MENTASTA MOUNTAINS SHEEP MANAGEMENT PLAN

LOCATION

The Wrangell and Mentasta Mountains in Game Management Unit 12 and that portion of Game Management Unit 11 lying to the east of Boulder Creek and north of Mt. Wrangell.

MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Maintain minimal restrictions on hunter access and methods of hunter transport.
2. Maintain the sheep population in balance with its habitat, if possible.
3. Discourage land use practices that adversely affect important sheep habitat.

THE SPECIES

The Wrangell-Mentasta Mountains contain some of the best sheep habitat in Alaska, and as a result some of the largest sheep populations are located in this area. An estimated minimum population of 6,500 sheep inhabit the area. Sheep populations of highest density appear to occur near Wiki Peak near Ptarmigan Lake in the Wrangells and from Noyes Mountain southeast to the Nabesna River in the Mentasta Mountains.

Production of lambs appears to be high throughout the Wrangell-Mentasta Mountains, although survival rates to two years of age are generally unknown. Limited surveys indicate fluctuations in lamb survival rates from year to year. Recognizable rams comprise between 17 and 32 percent of various populations in the area.

The Wrangell and Mentasta Mountains have long been popular sheep hunting locations. Annual harvests have ranged from about 120 to 225 sheep, with about 70 percent of the kill occurring in drainages of the Nabesna River and in the vicinity of Ptarmigan Lake. In recent years approximately 400 hunters have reported hunting in the area. Three-fourths of the hunters are residents, and their success rate is about 33 percent. Nonresident hunters who are required to employ guides, have a hunting success of 75 percent.

Harvests have reduced the percentage of legal rams in the population and the availability of large horned rams. This is particularly obvious in the Nabesna River drainage and part of the Wiki Peak area, both of which support most the sheep harvest. However, there are portions of the area that receive little hunting pressure and have a relatively large number of large horned rams in the population. As hunting pressure increases it is expected such areas will receive more hunter effort and will exhibit corresponding reductions in proportions of large rams.

Hunter access is primarily by means of aircraft and all terrain vehicles, although horses are used in the Chisana and White River drainages and, around Beaver Creek. All terrain vehicles are used in the Mentasta Mountains, particularly on the southwest side; aircraft are the common



access vehicle in other areas. A limited number of airstrips are available in the Wrangell-Mentasta Mountains, although some gravel bars are adequate for airstrips. Access in some areas, such as glacial regions and much of the Wrangells north of Beaver Creek, is limited to walking. Access from the road system is confined to the Mentasta Mountains where hunters walk from the Nabesna Road.

PROBLEMS

- * Establishment of a Wrangell-St. Elias National Park may substantially reduce hunting opportunity in the area by restricting or eliminating sport hunting or excluding certain access means. The Department should advocate continued sport hunting in this important hunting area to the extent that it does not conflict with other important uses of the area.
- * An expansion of mining activity in the Chisana area could result in excessive disturbance to sheep and possible abandonment of some range. The Department should delineate areas and advocate protection for critical sheep habitat, and propose limitations on resource development to minimize impacts on sheep through agreements and coordination with the land managing agencies.

IMPACTS

- * The proportion of large rams in the populations will decrease, but productivity of populations will remain high.
- * Without regulation crowded hunting conditions may occur in areas with good access.

13. RAINY PASS SHEEP MANAGEMENT PLAN

LOCATION

Game Management Unit 16.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions.
2. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

In June 1970, the only aerial survey conducted on sheep in Game Management Unit 16 was completed. One-hundred and forty-eight sheep were seen, most of them from the Happy River drainage to the west and south. No subsequent surveys have been made. Although not all sheep seen were categorized, 105 adults were seen of which 27 were rams; 18 others were lambs. It is unknown if the present population is lower or higher than it has been in the past. No habitat studies have been conducted. Predation by wolves, wolverine, eagles, and possibly bears occurs, but its importance is unknown. Winters are severe in the area and are probably the primary limiting factor to extended population growth.

Hunter pressure is light, but increasing. Two-hundred and thirteen sheep hunters were reported in the Rainy Pass area in 1974, and they harvested 21 sheep, while the average for the previous seven years was 151 hunters and 12 sheep. Since 1973, twice as many residents as nonresidents have hunted in the area. Guides have hunted sheep in this area for many years, particularly in the immediate vicinity of Rainy Pass. Most sheep are taken as trophies, but horn sizes have not been exceptional. Most hunters use aircraft to get into the area, then hike and camp out to take sheep. The only known trail in the area is the Iditarod dog sled trail and it is doubtful that sheep hunters use it.

PROBLEMS

- * Access to sheep populations in this area is limited to a few landing strips and lakes, with rivers restricting access by separating some sheep range from those landing sites. This makes it difficult to distribute sheep harvest over this area. Limited access concentrates hunters thereby decreasing the quality of the hunting experience in localized situations. If crowding by hunters is found to be detrimental to the quality of hunting in this area, permits may be issued to limit hunter densities where hunters concentrate.

IMPACTS

- * Hunter densities will remain at a low level.
- * Some guides may be affected if permits are not awarded to their clients.

14. WESTERN TALKEETNA MOUNTAINS SHEEP MANAGEMENT PLAN

LOCATION

Those portions of Game Management Units 13 and 14 enclosed by a line drawn from the Chickaloon River headwaters to Kosina Creek, down Kosina Creek to the Susitna River, down the Susitna River to Cook Inlet, then up the Matanuska River and the Chickaloon River to the starting point.

MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to distribute hunting pressure through the area and to maintain the harvest at desired levels.
2. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Approximately 80 percent of the sheep habitat in this area was surveyed by aircraft in 1974. A total of 423 sheep were seen including 114 rams, 246 ewes (and young rams) and 63 lambs. Little is known about sheep population size prior to the survey. It is probable that numbers were higher in the past than they are now.

Wolves, eagles, grizzlies, black bears and coyotes are all present in the area and are potential predators of sheep; however, their impact is unknown. Weather may be an important factor in population regulation; icing conditions are known to have caused declines in several sheep populations around the state. Little is known about the condition of the sheep range in this area; however, the ewe:lamb ratio is probably an indicator of fair to good range condition. No known extensive fires have taken place on the sheep range.

Hunter interest in the area seems to be low. This lack of interest may be due to the comparative difficulty in getting to most of this sheep habitat compared to other more accessible areas that have higher density sheep populations. Ram harvests in this area averaged 13 per year from 1970 through 1975 with about one-third of this harvest occurring in the Chickaloon River drainage. The proportion of legal rams in the population has been reduced by hunting in easily accessible areas. Most hunters in this area fly to camps and then hunt on foot, but this form of access is limited to a few suitable landing sites. Nearly all sheep hunting is recreational, although some hunters may hunt primarily for meat. Guided hunts are infrequent in the area. Sheep hunting seasons have traditionally been from August 10 through September 20 for 3/4 curl or larger rams only.

PROBLEMS

- * Little information about sheep populations or the factors limiting them in this area is available. The Department should collect more productivity, mortality and range data for these populations.



- * Access to sheep populations is restricted by the remote and rugged nature of much of the area. Final land disposition from the Alaska Native Claims Settlement Act will greatly increase the amount of private land within sheep habitat, as well as along access routes to sheep habitat, and may result in further access restrictions if private land is posted to trespassing. The Department should solicit the cooperation of private landowners to facilitate progressive management of sheep. Easements across private lands to public lands will be sought as provided for in the Alaska Native Claims Settlement Act.
- * A proposal to make the southwestern portion of the Talkeetna Mountains into a state park could eventually lead to the closure of that portion of the area to hunting. Should the park become a reality, the Department should work with the Division of Parks within the state Department of Natural Resources to develop a separate management plan for the Park emphasizing a blend of uses.

IMPACTS

- * Permits may eventually be required to hunt in some areas.
- * The number of hunters may increase as access to the area improves and restrictions in other areas result in more hunters willing to hunt in the western Talkeetna Mountains.

15. NELCHINA BASIN SHEEP MANAGEMENT PLAN

LOCATION

Game Management Unit 13 except for the areas included in the Tonsina and Sheep Mtn. Management Plans; that portion of Game Management Unit 11 lying to the west of Boulder Creek and the crest of the Wrangell Mtns; and that portion of Game Management Unit 14A lying south of the Matanuska River.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions and to maintain the harvest at desired levels.
2. Encourage public viewing and photography of roadside sheep populations.

THE SPECIES

The Nelchina Basin has had fairly abundant sheep populations since at least the mid-1950's. Inventory counts have been made of portions of this area at various times in the past decade. In 1969, 833 sheep were counted in the Chugach Mountains east of Coal Creek. In 1973 counts in the Chugach Mountains west of Coal Creek totalled 475 sheep. Also in 1973, 176 sheep were counted in the Watana Hills, and 1542 sheep were seen in the Wrangell Mountains portion of the area. In 1974, 1558 sheep were counted in the Talkeetna Mountains portion of the area. The northern Talkeetna Mountains may contain an additional 1000 sheep. A total estimate of 5600 sheep in the Nelchina Basin area is conservative. Of the sheep that were classified, 9 percent were legal rams and 14 percent were lambs.

Major natural mortality factors include severe winters and wolf predation. Sheep habitat in this area has not been studied. Compared to other areas in the state, this area has only a moderate potential for producing large-horned sheep. Sheep here generally have 3/4-curl horns at 5 years of age and full curl at 8 years.

The average annual harvest from the Wrangell Mountains portion of the area has been approximately 71 rams. Harvests in the remainder of the area have averaged 152 rams annually. The current proportion of legal rams in the population, 9 percent, indicates that the combined annual harvest of 223 rams has not been excessive for this area. Hunter success has averaged 44 percent, being highest in the Wrangell Mountains and lowest in the eastern Talkeetna Mountains. Seventy-five percent of the hunters have been Alaskan residents, with the eastern Talkeetna Mountains most used by residents. A smaller proportion of Alaskan hunters use the Wrangell Mountains. Most sheep hunting is a combination of trophy and recreational use, although domestic use of the meat is important to many hunters. Most sheep hunting takes place early in the season. Early arrival of winter snow cover has markedly reduced harvests in the past. Most hunters use air transportation for access to the hunting areas. Horses, off-road vehicles, and foot travel from nearby highways are other less used means of transportation.



PROBLEMS

- * The proper stocking level of mountain sheep on alpine ranges is unknown. Dall sheep studies on the Kenai Peninsula indicate higher productivity is possible where sheep numbers are controlled. Population levels cannot be managed by means of ram-only harvests. Range and sheep inventory data should be accumulated on major sheep ranges in the Nelchina area, and a pilot study should be initiated where sheep numbers are lowered and stabilized by hunting both ewes and rams.
- * Land management policies and regulations by government and private landowners may limit or preclude human activities, which may, in turn, affect important sheep habitat or the aesthetic qualities of sheep hunting in the area. Cooperative land use planning and management between the Department, land managing agencies and private landowners may resolve conflicts through mutually acceptable solutions.

IMPACTS

- * Depending on pilot studies now underway in other portions of the state, sheep numbers may be reduced by ram and ewe harvests until maximum annual increments of subadult sheep are reached. Stabilizing sheep numbers at this level should produce a reduction in overwinter mortality, larger lamb crops and increased recruitment of legal rams into the population.
- * More restrictive regulations affecting hunter numbers or methods of transport will not be implemented except to resolve expressed, hunter dissatisfaction arising from crowding or transportation conflicts.

16. TONSINA SHEEP MANAGEMENT PLAN

LOCATION

In Game Management Unit 13, that area bounded on the west by the Richardson Highway, on the north by the Edgerton Highway, on the east by the Copper River, and on the south by the north bank of the Tasnuna and Lowe Rivers.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control hunter numbers and distribution to maintain uncrowded hunting conditions.
2. Control access and methods of hunter transport to favor walk-in hunters.
3. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Dall sheep in this area may number 200. Quantitative data on sheep population status and on sheep range conditions are not available.

Prior to 1973 sheep hunters made relatively light use of the Tonsina area. Although all-terrain vehicle access was possible via the Bernard Creek, Tiger Mine and Tonsina Trails, the number of hunters was small. Airstrips were not available and the lakes near sheep habitat were too small for safe aircraft landings. In 1968, 1970 and 1972 no sheep were reported harvested in the area. Aircraft landing strips were established and two guides operating with aircraft and a few local residents using pack animals started using the area in 1973 and 1974. Of the 24 legal rams reported taken in the area since 1968, eleven were killed in 1974. The area was designated a walk-in area (no mechanized vehicles or pack animals from August 5 to September 30) during 1975. Five legal rams were reported taken in 1975, four by Alaskan residents and one by a nonresident hunter.

PROBLEMS

- * Non-compliance with the no-mechanized vehicles regulation was discovered in the area during 1975. The Department should actively disseminate information on access restrictions recently imposed on the Tonsina Management Area.

IMPACTS

- * The Tonsina Management Area will continue to provide sheep hunting under aesthetically pleasing conditions.
- * Hunter densities will be maintained at a low level by a permit system with a limited number of permits to be drawn, thereby limiting hunting opportunity.



17. UPPER CHITINA VALLEY SHEEP MANAGEMENT PLAN

LOCATION

That portion of Game Management Unit 11 in the upper Chitina Valley, bounded on the west by the Tana and Nizina Rivers, on the north by the crest of the Wrangell Mountains, on the east by the Canadian border, and on the south by the crest of the Chugach Mountains.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Limit the harvest of rams.
2. Control access, number and distribution of hunters and methods of hunter transport to maintain aesthetic hunting conditions and to distribute hunting pressure throughout the area.
3. Discourage land use practices that adversely affect the wilderness character of the area.

THE SPECIES

An aerial count of most of the Upper Chitina Valley area during 1973 disclosed 758 sheep of which 13 percent (96) were legal rams. Some of the best of this sheep habitat was not surveyed during 1973, and not all of the sheep in the surveyed areas were seen. The area probably contains 1,000 to 1,500 sheep, including 120 to 190 legal rams. Trend counts in portions of the upper Chitina Valley show that sheep populations have been relatively stable since at least the mid-1960's. Although relatively low lamb crops have been frequently seen, causes of lamb mortality and the condition of the range are unknown. This area has great potential for producing large-horned Dall rams. Not only have some of the largest sheep come from this area, but they attain their horn growth at an early age. On the average rams from this area attain three-quarter-curl by 5 years of age and full-curl by 7 years of age.

Current sheep hunting regulations limit hunters to one three-quarter-curl ram or larger during an annual 42-day season. Ram harvests from the Wrangell Mountains portion of this area for the 1972-75 seasons have annually averaged 84 rams. Harvests from the Chugach Mountains portion of this area have annually averaged 3 rams during the same period. Sheep density in the Chugach portion is much lower and access is difficult. Presently fewer large rams are available in the Wrangell Mountains than several years ago, although the total number of legal rams harvested has not changed appreciably. Seventy percent of the hunters since 1971 have been residents of Alaska, but most rams have been killed by nonresidents. Nonresidents are twice as likely to kill a sheep as are residents, reflecting the advantages of hiring a guide. Most sheep hunting in this area has been for trophies. Hunter access has been almost exclusively by aircraft.



PROBLEMS

- * Although the proposal for establishing a Wrangell-St. Elias National Park includes provisions to allow high quality sheep hunting within the park at least temporarily, Congressional action establishing a park may eliminate any provisions allowing hunting. The importance of this area for sheep hunting must be conveyed to Congress if hunting opportunity is to be retained in the area.
- * Sheep in the Wrangell Mountains have been relatively abundant for at least 10 years, but population declines can be expected to occur as they periodically have on many other sheep ranges in Alaska. Manipulation of key factors such as sheep population structure and numbers and reduction of predation may become advisable to ameliorate the effects of population reductions due to causes other than hunting. Such actions may become difficult or impossible under National Park Service management. Detailed cooperative planning including innovative management concepts will be needed to benefit all uses.

IMPACTS

- * The proportion of large rams in the population will increase. Present sex ratios and productivity of the population will not be affected under ram-only harvests.
- * Sheep harvests will be distributed among specified drainages by allocation of permits. Hunter crowding will be minimized.
- * All hunters will have an equal opportunity to obtain permits, but not all hunters who desire to use specific portions of the area will be allowed to do so.
- * Limits on the number of hunters will reduce the participation by guided hunters and will reduce demand for air taxi services.
- * Harvests of mountain goats by sheep hunters will be reduced.



18. SHEEP MOUNTAIN SHEEP MANAGEMENT PLAN

LOCATION

In Game Management Unit 13, the Sheep Mountain Closed Area: the boundary beginning at Caribou Creek, Milepost 107 Glenn Highway, thence easterly along the Glenn Highway to Milepost 123, thence along a line north to Squaw Creek, thence downstream to Caribou Creek and to the point of beginning.

MANAGEMENT GOAL

To provide an opportunity to view, photograph and enjoy sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Maintain a year-round sheep hunting closure in the area.
2. Encourage public viewing and photography of sheep and enhance viewing facilities.
3. Control access and activities of viewers and photographers, if necessary, to reduce disturbance to sheep.
4. Protect sheep from unnatural disturbance and harassment.

THE SPECIES

Observations from local pilots and guides in addition to Alaska Department of Fish and Game counts suggest that Sheep Mountain sheep are part of a more extensive subpopulation extending to the north and possibly to the south as well. Strong winds along the Matanuska River make portions of Sheep Mountain snow free and usable as winter range. In addition, the southern exposures of Sheep Mountain provide an area where grasses and forbs leaf out early in the spring. Sheep Mountain is probably an attractive core area of a much larger sheep range. Past total counts have varied from 84 to 227 sheep with legal rams usually comprising 20 to 25 percent. This is a substantially higher proportion than adjacent areas in the southern Talkeetna Mountains; however, percentages of lambs have been substantially less than in adjacent areas. A combination of protection from hunting plus segregation of the sheep population probably accounts for these composition differences. No habitat studies have been made on Sheep Mountain.

Sheep Mountain has been closed to sheep hunting since statehood. Past use has been mainly recreational viewing and photography. A large number of people look for sheep while driving past Sheep Mountain, a smaller number view sheep from roadside pull-outs, and a few people climb Sheep Mountain for close range viewing and photography. Sheep are usually close to the road and easily viewed during the spring, but they are usually higher on the mountain and less viewable during the remainder of the year. The lower portion of Sheep Mountain is not too difficult for humans to climb given sufficient time and stamina.

PROBLEMS

- * Mining on Sheep Mountain and additional human settlement at its base will detract from the aesthetic qualities of viewing sheep in a setting of alpine scenery. This area should be given a land



classification that will make sheep viewing the highest priority of land use. Mining, use of motorized vehicles, and additional human development should be prohibited or severely restricted through time and area zoning.

- * It is possible that excessive nonconsumptive use at higher elevations in the future may disturb sheep and cause their abandonment of areas visible from the road. Nonconsumptive use to that extent should be curtailed if it becomes a problem, possibly by restricting users to roadside areas.

IMPACTS

- * No substantial change from past management objectives or previous game regulations for this area are anticipated. The area will remain closed to the hunting of sheep year-round.
- * The age and sex structure and the number of the sheep on Sheep Mountain will not be modified directly, although these population parameters may be influenced by sheep management in adjacent areas. The sheep population is expected to fluctuate, however, due to natural conditions.
- * Selective landscaping to remove some screening roadside trees and brush will improve viewability of sheep, and creation of more roadside pullouts will increase the capacity for nonconsumptive use. An interpretive center, located along the road by Sheep Mountain, will increase public understanding of sheep life history.
- * Other uses of the area involving mechanized equipment including snowmachines would be prohibited, but uses such as cross country skiing and hiking would be enhanced.
- * Restrictions on additional human development would preserve this area for future viewing use.
- * Mining on Sheep Mountain would be prohibited or severely restricted.



20. WEST CHUGACH SHEEP MANAGEMENT PLAN

LOCATION

Game Management Unit 14C, and in Game Management Unit 7, the drainages of Glacier Creek and Twentymile River.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to view and photograph sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Limit the annual harvest of rams.
2. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to distribute hunting pressure through the area and to maintain the harvest at desired levels.
3. Encourage public viewing and photography of sheep.
4. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Sheep are found throughout the mountainous portions of the area excluding Portage Creek and Twentymile River drainages and land east of Lake George and Lake George Glacier. Aerial surveys conducted in 1951, 1968 and 1972 resulted in counts of 477, 868 and 1050 sheep, respectively. A 1975 survey of selected areas showed concentrations similar to those of 1972. These surveys, coupled with the Peters Creek trend area counts (the lands between Eagle River and Eklutna River), which have been sporadically conducted since 1950, indicate that sheep numbers increased during the 1950's and have remained fairly constant since then. Depending on time of year and weather conditions, aerial survey counts are thought to represent 70-90 percent of the actual population.

Fairly extensive natural mortality among sheep in the area has been documented. Hunters and hikers have reported finding remains of both young and adult sheep in old snowslide sites or on wintering grounds. Natural mortality factors have probably not adversely affected current population levels.

Habitat conditions within drainages containing major sheep concentrations are considered excellent. Important drainages include Ship Creek, Eagle River, Peters Creek, Thunderbird Creek, Eklutna River, Goat Creek and Hunter Creek. Habitat conditions in Campbell Creek, Indian Creek, and Bird Creek are considered fair. Sheep habitat is limited in the Lake George area and from Glacier Creek south to Portage.

Sheep have been hunted in the area for many years, although harvest levels prior to 1962 are unknown. Between 1962 and 1967, approximately 35-40 sheep were killed annually. Since 1968, a yearly average of 30 three-quarter curl and larger rams have been taken. A high of 50 were harvested in 1969 and a low of 12 in 1973. In 1975, 29 were taken.



Several extremely large sheep have been taken from the area, although it is not known for producing exceptional trophies on a regular basis. In 1975, all sheep legally harvested were taken by local residents, and all but 5 of 80 unsuccessful hunters were also local residents. Only 2 hunters were nonresidents. In addition to legal kills, several illegal kills have been reported annually in the accessible sections of the area.

During the period 1968 to 1972 an annual average of 298 persons reported hunting sheep in the area. From 1973 to 1975, the average was 118. The decrease in hunter pressure is mainly attributable to a shortened season throughout most of the area. The hunting season extended from August 10 to September 20 from statehood until 1972. Since 1973 the season has been from the day after Labor Day until September 20 in most of the area where sheep are found. Hunter success has fluctuated between 10 and 27 percent over the past 8 years. Higher success has been achieved in recent years with reduced hunter pressure.

Access to hunting sites is via several major roads and numerous connecting trails. Hunter transport is restricted to foot travel and horseback. Because of access and transport limitations, hunting pressure and harvests have been fairly well distributed throughout the areas of major sheep concentrations. Harvests over the past 25 years have reduced the proportion of legal rams in the population from approximately 13 percent in 1950 to 7 or 8 percent during the past decade with no significant effect on population productivity or total numbers.

Other uses of sheep in the area include viewing and photography. Bands of 10 to 50 sheep are visible from the Seward Highway near Indian, the Eagle River Road and trail and the Eklutna road. No roadside viewing sites comparable to Sheep Mountain or the Cooper Landing Closed Areas are found within the West Chugach area, but several excellent viewing sites in proximity to mineral licks are located near the headwaters of Peters and Ship Creeks. Few people utilize these sites specifically for viewing. Opportunities for viewing and photography in accessible locations are best in late spring when sheep are at lower elevations on their winter and lambing ranges. Such opportunities diminish in summer and fall and are almost nonexistent during winter. Viewing and photography access restrictions are only slightly more lenient than those for hunting. Winter travel limitations for snowmachines have in some areas reduced opportunities to view and photograph sheep.

PROBLEMS

- * Noncompliance with hunting regulations and transportation restrictions has occurred and may increase. These problems result from overlapping authority of various agencies involved in resource management in the area. Future public information and education actions by the Department should clarify nebulous regulations.
- * Opposition to sheep hunting in Chugach State Park has been expressed by some Anchorage residents and by Chugach State Park staff. It is the Department's opinion that hunting is not significantly detrimental to the sheep population nor to opportunities to view and photograph sheep in the area. Hunting of sheep is already excluded in some sections of the area. Much of the Eklutna River drainage, the Eagle River drainage below the gorge, the Anchorage hillside area from Campbell Creek to Rainbow and the drainages of Falls Creek and Indian Creek are closed to sheep hunting. Sheep hunting is also prohibited on Fort Richardson. Native land selections in the drainages of Eklutna, Hunter, Knik and Peters Creeks will place extensive lands within private ownership and therefore possibly exclude them from future hunting or viewing use. The Department opposes any additional sheep hunting closures.



IMPACTS

- * As hunting pressure increases, number and distribution of hunters will be controlled by permits.
- * Use of sheep by nonhunters would be only slightly affected under proposed management. A greater number of large rams would be available for viewing and photography, but sheep may become more wary for a longer period in the fall.
- * Other recreational activities and other species in the area would not be adversely affected by this management.

LOCATION

Game Management Units 7 and 15 except the area within the Cooper Landing, Kenai Lake, and Tustumena Sheep Management Plan areas.

PRIMARY MANAGEMENT GOAL

To provide the greatest opportunity to participate in hunting sheep.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to view, photograph and enjoy sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to distribute hunting pressure through the area and to maintain the harvest at desired levels.
2. Maintain a highly productive sheep population.
3. Encourage public viewing and photography of sheep.

THE SPECIES

Approximately 250 sheep inhabit this area. Sheep numbers increased steadily from the early 1950's through 1968 but have since fluctuated. The population is presently below the 1968 level. A major die-off of sheep occurred on Surprise Mountain in the winter of 1970-71 and that population has slowly declined since that time.

Lamb mortality at birth appears to be the major mortality factor limiting sheep numbers. Lamb mortality appears to be directly related to range condition but weather conditions at lambing time are also important. Winter losses of adult and subadult sheep have occurred when snow conditions prevented sheep from pawing through the snow to reach food. Such a die-off occurred on Surprise Mountain in the winter of 1969-70. Coyote and wolf predation occurs in this area, but its extent and effects are unknown.

Sheep ranges have been altered little by human activity in this area but range conditions are thought to be generally poor as the result of prior overutilization. The overutilized range condition existing on Surprise Mountain is probably representative of the area and is the primary factor limiting lamb survival. Parts of this area are also on the edge of Dall sheep distribution, and other factors, particularly weather cycles, may affect range and the availability of winter feed.

Large trophy sheep have been produced in this area in the past and large trophies are still taken occasionally. However, for the most part hunting pressure is so intense that rams are harvested the first year they become legal. Very few rams reach large trophy size. Between 20 and 25 rams have been harvested annually since 1962.

The hunting season has traditionally been August 10-September 20 with only rams with 3/4-curl or larger horns being legal. Most hunting occurs during the first two weeks of the season and most sheep are taken during that period.



Most hunters who pursue sheep on the Kenai Peninsula are either Anchorage area or Kenai Peninsula residents. Very few nonresidents or hunters from other areas of the state hunt in this area. Nearly all hunting is recreational, primarily in pursuit of a trophy. A few people hunt sheep primarily for the meat with trophies being of secondary importance. Very little guiding occurs in this area. Most hunters reach their hunting areas by hiking in from the road system. A few hunters fly into lakes to reach their hunting area.

Harvesting of rams only has greatly distorted the sex ratio of the populations and limited the availability of large rams.

A minor amount of viewing takes place along the road system, particularly in May and June when sheep are visible in several areas. Some viewing also occurs incidental to hunting for other species and hiking in the area. Opportunities for roadside viewing are much better in the nearby Cooper Landing Sheep Management Area.

PROBLEMS

- * Failure to limit sheep populations through harvesting of all sexes and ages has resulted in range damage and has lowered production and survival of lambs. The Department should increase public awareness regarding the long term benefits of regulating populations through harvesting of both sexes if such management proves to be possible.
- * Ready access to this area may eventually result in more hunting pressure than sheep populations will tolerate. The Department should closely monitor hunting activities and determine methods or means of limiting hunters when such a problem develops.

IMPACTS

- * Little change in present use patterns will occur in the near future as the result of implementation of this plan.
- * Concentrations of hunters may occur in accessible areas.

LOCATION

In Game Management Unit 7, that portion of the existing Cooper Landing closed area lying north of the Sterling Highway.

MANAGEMENT GOAL

To provide an opportunity to view, photograph and enjoy sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Maintain a year-round sheep hunting closure in the area.
2. Encourage public viewing and photography of sheep and enhance viewing facilities.
3. Control access and activities of viewers and photographers, if necessary, to reduce disturbance to sheep.
4. Protect sheep from unnatural disturbance and harassment.

THE SPECIES

The Cooper Landing sheep population gradually increased from a low point in the early 1940's to a peak of 312 animals in 1973. Since then, it has slowly declined. The current population appears to be at the upper limits of the range carrying capacity. Adverse winter weather and crowded range conditions appear to be the predominant population limiting factors.

The area has been closed to both goat and sheep hunting since before statehood. The Sterling Highway bordering one side provides excellent year-round viewing opportunities, but most use occurs during the summer. One roadside pull-off area has posted notices calling attention to these opportunities. In addition, two well-developed trails provide year-round access through the area. A majority of the users are non-Peninsula residents. Wildlife photography, a popular pursuit in Alaska, occurs in the area to a limited but increasing extent. In recent years the area has served as a sheep research control area.

PROBLEMS

- * If viewers or photographers create excessive disturbance in areas away from the Sterling Highway, sheep may abandon terrain easily viewed from the highway where the majority of observation takes place. Activities of users and behavior of sheep in the area will be monitored, and off-road activities will be controlled through permit procedures or access restrictions if roadside viewing opportunity is reduced.

IMPACTS

- * All activities which currently exist in the area will continue. Viewing and photographing activities will be encouraged by providing users with interpretive literature.
- * Activities of users which become disruptive to sheep will be controlled through permit or access restrictions.



23. KENAI LAKE SHEEP MANAGEMENT PLAN

LOCATION

That portion of Game Management Unit 7 bounded on the northwest by the Kenai River and the Sterling Highway; on the northeast and east by the Anchorage-Seward Highway; on the south by the north shore of Kenai Lake between the Anchorage-Seward Highway and Porcupine Island and a line extending from Porcupine Island to the south end of Upper Russian Lake; and on the west by the Russian River and Upper and Lower Russian Lakes.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to take large sheep.

SECONDARY MANAGEMENT GOALS

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

To provide an opportunity to view, photograph and enjoy sheep.

To provide an opportunity for scientific and educational study of sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Provide for limited harvests of full-curl rams.
2. Control the number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions and to maintain the harvest at desired levels.
3. Allow limited harvests of any sheep population segment, if necessary, to attain a desirable sheep population size or structure.
4. Encourage public viewing of sheep and enhance existing viewing facilities.
5. Encourage sheep research studies in the area.

THE SPECIES

Aerial trend surveys indicate that Dall sheep populations over most of the eastern Kenai Peninsula, including the Kenai Lake area, increased steadily from the early 1940's through the late 1960's and early 1970's. Since then most populations have declined. Within the Kenai Lake area, the Crescent Lake sheep population experienced a similar trend except that the population was purposely reduced in 1971. Since 1971 the Crescent Lake population has been maintained at a fixed level through either-sex sport hunting. The other sheep population in the Kenai Lake area, the Cooper Mountain herd, has continued to decline under ram-only hunting.

In 1970 the Department initiated a sheep research program to assess the impacts of various types of management. The Crescent Lake program consisted of harvesting ewes and some full-curl rams in an attempt to maintain the population below habitat carrying capacity. Between 1970 and 1974 a total of 124 sheep, including rams, ewes and lambs were taken by recreational hunters under permit conditions. Population statistics collected since initiation of this program indicate that the herd has



suffered lower mortality and higher lambing success than found in adjacent unhunted sheep populations. In essence, the Crescent Lake sheep population has provided a considerable number of sheep for consumptive use while maintaining the population at a stable level compared with herds found on nearby areas under no hunting or ram-only hunting regimes.

Participation in the limited ewe and full-curl hunts thus far has been almost exclusively by Alaska residents. Most sportsmen interested in pursuing ewe sheep are meat hunters, and this type of use is not attractive to nonresident trophy hunters. This pattern of use is expected to continue indefinitely. On the other hand, permit hunts for full-curl rams are expected to generate considerable enthusiasm from both resident and nonresident hunters.

The Kenai Lake sheep population has long been available for nonconsumptive use. The area is bordered by roads on two sides and Kenai Lake provides boat access. Seasonal viewing along the highway is a popular pursuit by all classes of recreationists. The best opportunities to photograph sheep probably require overnight camping in alpine conditions.

PROBLEMS

- * Public and political opposition to the hunting of ewe sheep may force cancellation of either-sex hunts and hinder current research programs in the area. The Department should conduct a public relations program to explain the benefits to be derived from either-sex sheep harvests.

IMPACTS

- * The Crescent Lake sheep population will be maintained below range carrying capacity. Herd productivity will increase as should production of full-curl rams.
- * Selective harvests of rams and ewes will continue through the use of limited permit hunts. Not all hunters who desire permits will receive them.
- * The Cooper Mountain sheep population is expected to fluctuate according to range and weather conditions, and no substantial changes in sex and age composition are expected.
- * Hunters should observe large numbers of sheep and will experience minimal competition and high hunter success.
- * Present nonconsumptive uses will probably increase.
- * All sheep research will continue with no conflicts with other uses expected.
- * No effects on other species or other uses of the area are anticipated.



24. TUSTUMENA SHEEP MANAGEMENT PLAN

LOCATION

That portion of Game Management Unit 15 south of Skilak Glacier, River and Lake and within the Kenai National Moose Range boundary.

PRIMARY MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

SECONDARY MANAGEMENT GOAL

To provide an opportunity to view, photograph and enjoy sheep.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport to maintain aesthetic hunting conditions.
2. Encourage public viewing and photography of sheep in a wilderness setting.
3. Discourage land use practices that adversely affect the wilderness character of the area.

THE SPECIES

The Tustumena area presently contains 700 to 800 sheep. The population peaked in 1968 when 989 sheep were observed on surveys and then declined until about 1974. A survey of a portion of the area in 1975 indicated that sheep may again be increasing.

Lamb mortality at birth appears to be the major factor limiting sheep populations in this area. Lamb mortality is a function of range quality and quantity and inclement weather at lambing time. Mortality of adults from malnutrition occurs when snow conditions are such that sheep can not paw through snow to reach forage. A sheep die-off was documented on Surprise Mountain in the winter of 1969-1970 and is thought to have occurred in the Tustumena area also. Predation by wolves and coyotes occurs, but it is not considered a limiting factor on the sheep population at this time.

Sheep ranges in this management area have been unaffected by human activities. There are no developments in the area, and the only use has been recreational. The quality of the habitat may have been damaged by excessive sheep use in the late 1960's. Fewer sheep in the early 1970's may have allowed at least a partial recovery of the range.

The Tustumena area has produced trophy rams in past years, but heavy hunting pressure has reduced the availability of large trophies. About 10 percent of the legal rams in the area are full-curl or larger. Most rams are harvested the first year they reach legal size.

Hunting pressure is heavy and concentrated in the northern half of the area and is moderately heavy in the southern half. The annual harvest of sheep has averaged between 30 and 35 3/4-curl or larger rams. Most of the harvest and hunting pressure occur during the first two weeks of the season, but in recent years hunter effort has increased in the later part of the season. Hunting seasons and bag limits have not changed



since statehood. Hunters pursuing sheep in this area are almost entirely Kenai Peninsula and Anchorage area residents. Few hunters from other areas pursue sheep in this area because of the crowded hunting conditions. Hunting is mostly recreational hunting for trophies. A few individuals hunt primarily for recreation and meat. All animals killed are used for food. Harvesting of 3/4-curl and larger rams has distorted the sex ratio in favor of ewes with an increased potential population productivity.

Access to the north half of the area is by floatplanes landing on mountain lakes, by horse trails and by boat and foot trails from Skilak and Tustumena Lakes. Access is more restricted in the south half, being limited to boats from Tustumena Lake, with no established trails. In the northern half of the area, most hunting occurs within a few miles of the access lakes. Hunters willing to hike long distances from the lakes are much more likely to be successful.

PROBLEMS

- * Too many hunters during the first half of the season reduces aesthetic hunting appeal of the area. Although crowding is greatly reduced in the last half of the season, few legal rams remain. Large trophy rams are not available in significant numbers because most rams are killed as soon as they become legal. The number of hunters should be reduced to eliminate crowded hunting conditions and to increase the proportion of large rams.

IMPACTS

- * The number of large rams available to hunters will increase.
- * Many people who have hunted this area on a regular basis for rams will no longer be able to do so. Those who do participate in the ram hunt will find uncrowded conditions and a greatly improved chance of taking a large ram. There will be increased opportunities for non-trophy hunters to participate in the harvesting of ewes by permit.
- * Increasing the average horn size of rams will improve the chances of nonconsumptive users to view and photograph large rams.
- * The demand for charter flight services to the area may be reduced. Opportunities for guiding will probably be enhanced.
- * No changes in other uses of the area are expected.



DALL SHEEP IN WESTERN ALASKA

Dall sheep (*Ovis dalli*) occupy alpine portions of the Alaska Range north and east from Lake Clark, primarily on the western and northern slopes. An estimated 2,000 sheep occupy the Alaska Range west of Mt. McKinley National Park. About 1,000, reside in that portion of the Alaska Range included in the Western Region. Surveys in this area have been limited and population estimates are only approximate.

Like most northern ungulates, Dall sheep populations are subject to fluctuations in abundance. Numbers were reportedly high in the early part of this century. A major decline occurred in the 1930's and early 1940's, probably as a result of unusually severe winters, which left sheep herds throughout the state at low levels. Herds increased again throughout the 1950's and 1960's. Although data are not available for all populations, it is probable that sheep numbers in Western Alaska reached a peak by the late 1960's as they did elsewhere in the state, and have been stable or declining slowly since then. Sheep populations are probably near the carrying capacity of winter ranges and may be expected to remain relatively stable or to decline with the occurrence of abnormally severe winters.

Dall sheep are largely animals of alpine habitat. During the summer, they occupy relatively large areas of their annual range and remain almost entirely above brushline. Alpine meadows and slopes are used for feeding and resting, while nearby cliffs or large rocky outcrops are required for escape cover. By early November, sheep begin to congregate on their winter ranges. These are areas of limited size where forage is available throughout the winter on windblown ridges or slopes, and where cliffs and outcrops are available to enable escape from predators. A herd occupying many square miles of summer habitat may be restricted to, and limited in size by, a winter range of relatively few acres. Some herds occupy winter habitats several miles removed from their summer range and migrate between the two, sometimes following traditional routes leading across timbered valleys. Breeding takes place from mid-November throughout early December.

With the beginning of snow melt in spring, most sheep move down from their windswept wintering grounds to the lower, south-facing slopes where green plants first emerge. At this time, they may be found down in alders and near the upper limits of timberline, much lower than at any other season.

Lambing occurs in May and early June. Parturient ewes seek isolation in the most rugged cliffs available, to give birth to their single lambs. Escape terrain is particularly vital at this time to protect the comparatively immobile mothers and newborn young from disturbance and predator attack. Upon completion of lambing, the ewes and young follow the retreating snowline upward and move onto summer ranges. Rams may precede ewes by several weeks in moving to summer range.

Subsequent to lambing, sheep use natural mineral licks extensively. Although such licks have not been charted in this region, some undoubtedly exist. Sheep, especially females and young, will frequently travel several miles over well-worn trails to congregate in mineral licks where they spend hours eating the mineral-rich soil. Use of licks is heavy in early summer and gradually lessens as summer advances. Natural mineral licks are apparently of extreme importance to many sheep, although mineral requirements are not yet clearly understood. Some herds apparently do not have access to mineral licks and may substitute the use of certain plant species to obtain the required minerals.

Dall sheep are primarily grazing animals; bunchgrasses, particularly alpine fescue, and sedges make up the majority of their annual diet.



These are supplemented by smaller amounts of browse such as alpine willow. Various forbs are consumed during summer, while lichens become important quantitatively in winter.

Climate is the most important factor regulating sheep numbers and distribution. Deep, dense snows prevent sheep from reaching winter forage and are important in limiting sheep distribution, particularly in the southern limits of Dall sheep range where heavy snow accumulations occur due to maritime influences. Sheep require relatively light snowfall and wind to survive during winter. Low temperatures keep the snow powdery and soft, allowing winds to remove it from ridgetops and slopes, exposing winter forage. Warm winters or thaws, result in dense, crusted snow through which the sheep cannot easily dig nor the wind remove. By late winter, sheep are often restricted to small areas of exposed, wind-scoured, low-quality vegetation which provides less nourishment than is used in daily activities. Sheep then rely, in part, on metabolism of stored body fat and tissue. If spring arrives late, body reserves may be used up and mortality occurs. Exceptionally severe winter, such as those which occurred in the early 1940's, have been the only factor known so far to have caused major "crashes" in Dall sheep populations.

Overwinter survival of lambs is normally low in comparison to that of adult sheep and severe winters depress it further. Newborn lambs are particularly susceptible to adverse spring weather such as cold wind, rain, or snow during the critical lambing period. Summer weather, while not as critical as that in winter, must provide an adequate growing season for forage to enable sheep to store sufficient body fat for survival during winter.

Predation does not appear to be important in population control except under exceptional circumstances, such as when deep winter snows force sheep to feed far from protective cliffs. Parasites, and diseases also take their toll, but their importance in Alaska is not well understood. Accidents are probably uncommon.

Sheep were originally hunted for subsistence and the market during the early days of Alaska's settlement, but they now are taken primarily by recreational hunters. Traditionally, only mature rams with horns of 3/4 curl or greater configuration have been legal game during an August-September season. Dall sheep are recognized worldwide as one of North America's outstanding trophy animals, and they are an important sport-hunted species in Western Alaska.

Sheep harvests in the area have been characterized by increases in numbers of hunters (about 115 in 1975) and in number of rams taken (1967-1975 average of 66 rams with 69 taken in 1975). Success is slowly decreasing with 60 percent of 1975 hunters successful. About 54 percent of the 1975 harvest was taken by nonresidents, who made up only 36 percent of the hunters. Their greater hunting success is probably attributable to the requirement that nonresidents must be accompanied by a guide while sheep hunting. Success of all hunters would undoubtedly be lower, were it not for the use of mechanized off-road vehicles, including aircraft, that are used for transport to otherwise inaccessible hunting areas.

The increasing hunting pressure in Western Alaska will probably cause the number of large rams to decline in some herds even though adequate breeding stocks remain. Increasing numbers of hunters are competing for a relatively stable or declining number of legal rams. Under these circumstances decreasing size and numbers of trophies taken and reduced hunter success can be expected. However, the average age of rams taken in recent harvests remains above the average age required to reach full-curl in this region. This indicates that sufficient older rams still remain to allow hunters to be selective for large animals rather than merely taking the minimum legal size.



While ram-only hunting harvests do not control sheep populations, carefully regulated, experimental either-sex hunts have proven feasible in controlling herd numbers. These provide more animals for harvest while apparently increasing lamb production and survival. Such intensive management may become necessary as hunting pressure increases.

Although nonconsumptive uses of Dall sheep are important in other areas of Alaska, little such use occurs in Western Alaska due to its inaccessibility to the general public. Adjacent Mt. McKinley National Park contains a large number of sheep and provides considerable opportunities for nonconsumptive use of sheep.

PROBLEMS

- * Expanding human land use may adversely affect sheep through the alteration of important habitat or through disturbance of sheep use of critical areas. Mineral licks, winter ranges, lambing areas, and migration routes are particularly susceptible to damage or interference from such activities as mining, construction in transportation and utility corridors, and development of alpine recreation sites. Critical habitats must be protected from alteration or undue disturbance.
- * Increases in numbers of hunters, development of access, and improved transport methods have reduced availability of legal rams, even in once-remote and lightly hunted areas. In most areas the average size of rams available to hunters has decreased. In addition to reduced hunter success, increased hunting pressure has lowered the quality of the hunting experience. Management measures to regulate hunter density and distribution, and to increase the number of legal rams available to hunters should receive greater emphasis.
- * Limitation of use to rams of 3/4 curl or larger has had little significant effect on population size or trend, even in herds in other regions of Alaska where most legal rams are removed by hunters. Thus, ram harvests are of little utility to management where population control or productive manipulation is desirable. The effect of 3/4 curl management has been to create an imbalance in sheep sex ratios in many herds. Since sheep populations may be near the carrying capacity of the range and may be declining in some areas, the imbalance in sex ratios coupled with heavy hunting pressure results in less rams being available to hunters. Additionally, since relative densities of sheep populations are probably high, the production and survival of lambs is probably low as it is elsewhere in Alaska under similar conditions. Low lamb survival results in relatively few legal rams being recruited into the population. Management of harvests providing the option for either sex hunting would benefit use significantly as well as benefit the resource. Harvests of either sex would allow more animals to be taken. Reduction in population density would improve lamb production and survival, as well as possibly decreasing potential adverse impacts of severe winter weather on the total population. Increased production and survival of lambs would offset larger harvests and would increase the recruitment of rams to the population.

LOCATION

That portion of Game Management Unit 9 draining into Lake Clark east of and including the Tanalian River, and draining into Cook Inlet north of the Johnson River; that portion of Game Management Unit 17 drained by the Chilikadrotna and Mulchatna Rivers east of the outlet of Turquoise Lake; and that portion of Game Management Unit 19 including the area lying east of a line drawn from the northwest corner of Mt. McKinley National Park west southwest to Farewell, west to Lone Mountain, and south southeast to the confluence of the Telaquana River and Trail Creek, and the area drained by Trail Creek.

MANAGEMENT GOAL

To provide an opportunity to hunt sheep under aesthetically pleasing conditions.

EXAMPLES OF MANAGEMENT GUIDELINES

1. Control access, number and distribution of hunters and methods of hunter transport, if necessary, to maintain aesthetic hunting conditions.
2. Develop hunter access, if necessary, to distribute hunting pressure through the area.
3. Discourage land use practices that adversely affect the wild character of the area.

THE SPECIES

Little information is available regarding past sheep populations in this area. Local residents report sheep were not abundant during the 1940's, but became more numerous during the 1950's and 1960's. After 1968 the sheep population declined somewhat during a series of severe winters. The Farewell sheep population shows signs of good recovery from this setback. Aerial surveys of sheep in this area during the summers of 1972 and 1973 suggested the population may exceed 2,000 animals. Composition data from both years indicated rams composed about 25 percent of the herd. Roughly 10 percent of the sheep observed were 3/4 curl rams or larger. Summer lamb:ewe counts in 1972-75 ranged from 20 lambs to 60 lambs per 100 ewes, with low values in 1972 and 1973 following severe winters and delayed springs. Range conditions in the Farewell area are poorly understood, but a ground reconnaissance of the heavily used lambing and wintering area in the Sheep Creek drainage indicated there has been some range damage occurring from heavy use. Another important lambing and wintering area occurs along the headwaters of the Tonzona River. Range conditions in this section are not presently known.

Sheep hunting became popular in the Farewell area in the early 1960's, and hunting pressure has increased to moderate or heavy levels in much of the area. Harvests have ranged from 24 sheep in 1962 to 119 in 1974. Since 1973 more than 200 hunters have hunted in the area each year. The harvest is fairly evenly distributed through the 42-day season.

Hunter success has ranged from 70 to 49 percent, depending on weather conditions. Although resident hunters outnumber nonresident in most years, more than half the harvest is taken by nonresidents. Higher



success by nonresidents results from the requirement that they be accompanied by guides. About 15 guides operate in the area.

The sheep harvest has not significantly reduced the availability of legal rams except in some heavily hunted drainages. Sheep in some drainages rarely see hunters due to problems of access. Hunters have taken many trophy sheep from the area, including several rams exceeding 42 inches in horn length. Horn curl sizes have averaged about 34.0 inches over the past 10 years.

Access into the area has been primarily by aircraft, with 90 percent of the sheep being taken by airborne hunters. A few hunters utilize horses, boats, and all-terrain vehicles. There are few differences between local, nonlocal, and nonresident means of access.

Domestic use of the Alaska Range sheep was important to villagers of Nikolai and Telida prior to 1955. Hunting usually took place after the first snowfalls in mid-October or early November. Travel was by dog team and the meat was hauled back to the villages by sled.

PROBLEMS

- * Much of the Farewell area is highly mineralized and will be subject to increased prospecting and mining activities in the near future. The Sheep Creek area, an important sheep lambing and wintering area, has been heavily staked with discoveries of extensive ore bodies. In addition to disturbance of sheep in critical habitats, mining activity may increase access into the Farewell area, and will result in a deterioration of the wild character of the area. Important sheep habitat within the Farewell area should be identified and mining activities should be regulated to minimize disturbance to sheep. Restrictions on developmental activities may be necessary to minimize environmental degradation.
- * Hunting pressure has been concentrated near relatively few unimproved bush airstrips. Availability of rams in proximity to access points is reduced and crowding of hunters detracts from aesthetic enjoyment of hunters. The Department may develop additional access strips to reduce hunter crowding and to distribute the harvest through the area.
- * Development of a proposed road from Anchorage to McGrath through Rainy Pass and down the South Fork of the Kuskokwim River would open the area to increased hunting pressure and use of all-terrain vehicles. The number of hunters in heavily hunted portions of the area will be controlled by permit. Off-road vehicle restrictions would be necessary in areas accessible by road.
- * Portions of the upper Tonzona River drainages have been recommended for inclusion in the proposed Mt. McKinley National Park extension. The Tonzona drainage is an important lambing area in addition to supporting a significant population of sheep, and its inclusion into a national park will substantially reduce hunting opportunity in the Farewell area.

IMPACTS

- * Permits will be used to control hunter density.
- * Productivity and survival of lambs should improve as range conditions improve.



- * Restrictions in some drainages on mechanized transport while hunting will improve aesthetic hunting conditions.
- * Guides and outfitters may be affected by restrictions on numbers of hunters and controls on hunter transport.
- * Development of more aircraft access strips should help relieve the present problem of hunter concentration around a few localized areas.
- * Some seasonal or spatial limitations on mining activity in important sheep habitat may be recommended.



Submitted By
Robert Cassell
Submitted On
1/24/2015 10:17:49 AM
Affiliation

Proposal 207

Oppose

1) This measure would make an enforcement nightmare for pilots and the Alaska Fish and Wildlife Troopers. I have personal experience with looking for remote landing sites from the air not related to sheep hunting and someone on the ground calling the FAA on the low passes needed to assess the landing site. Upon receiving a phone interview from the FAA, Flight Standards District Office investigator after returning from the field determined the person making the complaint had a history of these complaints with no enforcement actions taken. In other words I believe this would be used to intimidate pilots with state sanctioned police investigations harassing legitimate flight operations associated with sheep hunting. How do you determine if an aircraft is spotting sheep? I use the aircraft to plan approaches to hunting areas, is this going to be investigated when someone on the ground observes multiple passes in an area and makes a formal complaint?

2) Oppose. **If the goal for this proposal is to limit hunter success I would prefer a draw permit hunt.**

3) Oppose. Again- **If the goal for this proposal is to limit hunter success I would prefer a draw permit hunt. This could also make for less hunters in the field and a quality experience that I believe is what some of the complaining is about.**

Previously submitted this version has had spelling corrections made.

Please present this version to the Game board



Submitted By
Ed Soto
Submitted On
1/25/2015 7:40:56 PM
Affiliation

Phone
(907) 231-5431

Email
ed-soto@live.com

Address
3201 N. Departure Ct
Wasilla, Alaska 99654

Procedural Comment: Proposal 207 cannot be found in the list of proposals on the Board of Game web site. Proposals only go up through #206. Perhaps this proposal has not yet been properly posted for public comment. Does the Board typically create its own proposal? Has this proposal been given enough time for review and comment?

Comment for Opposing Proposal 207:

1. It is unrealistic and unsafe to use aircraft while sheep hunting in the manner proposed by this measure. In order to fly safely in the mountains, pilots must be given the freedom to fly required flight paths that provide for adequate safety of flight and evaluation of terrain. Often this requires multiple high and low level passes with transit through and in and around mountainous terrain.

After having read the hunter surveys, clearly the main issue is that of hunter overcrowding and declining sheep populations. Proposal 207 addresses neither of these issues and merely chooses to penalize both resident hunters with aircraft and non-residents using guides and transporters. I would much prefer to see a reduction in non-resident hunters or a drawing system to reach solutions to hunter overcrowding and sheep population densities. Proposal 207 will subject pilots to excessive enforcement actions based on the appearance of wrongdoing, jeopardize safety in flight and will not provide relief to the main issues resulting in hunter dissatisfaction.

Finally, this measure does not seem to have any science behind it. What data suggest that waiting until 2PM will result in more sheep hunter satisfaction, more sheep or less hunter overcrowding? What data suggest that restricting the taking of sheep within 5 miles of the fly-in location will alleviate the same circumstances? Since many hunting areas are contained within 5 miles of the fly-in location by mountainous terrain, then waiting 24(48) hrs is simply a more draconian version of restricting hunting until after 2PM the following day. It would be ironic to be on an airstrip watching a ram and waiting the prescribed time only to have a hunter come up in an ORV and harvest that ram without any restrictions.



Submitted By
Scott Peterson
Submitted On
1/26/2015 10:43:54 AM
Affiliation
None

I wish to voice my support for Proposal 207 restricting the use of aircraft while sheep hunting. It is a well known fact amongst Alaskan sheep hunters that most large rams are located from the air and selected for harvest. This is widely believed to be an unethical practice. This was well summarized by Mr. Tony Russ in his excellent book "Sheep Hunting in Alaska". In his second edition, page 198 Mr Russ states:

" Most of the large sheep taken currently are what I call 'airplane sheep'. Trophy hunters commonly spend countless hours scouting with a Super Cub to locate an exceptional Dall ram. Hundreds of hours of flying time representing thousands of dollars goes into the taking of many record book rams. Often the hunt is anticlimactic because sheep are not really that hard to take for experienced rifle hunters."

It is well known that many hunters spot rams from the air in the late evening then land nearby and wait till first light to take their ram. The time from last light till after 3 am when legal hunting resumes could be as short as 4 hours. This amounts to little more than "land and shoot" hunting which is viewed by most as unethical.

The Boone and Crockett Club states that:

"With the popularity of personal aircraft in the 1960's increasing and being used in hunting to access remote areas in North America, it became apparent that some hunters were using aircraft not only to reach their hunting destination, but locate their game from the air, land in the vicinity, and pursue for a shot. In some cases hunters were using aircraft to herd game into a more accessible situation. The Club determined that this was an unfair advantage to both the game and other hunters."

In fact animals taken, after being spotted from aircraft, are not eligible for entry in the Boone and Crockett Record book.

The use of aircraft by sheep needs to be sharply restricted in a manner that undue hardship is not shouldered by ethical sheep hunters who utilize aircraft, but insures that all sheep hunters only pursue their quarry "fair chase". Please consider making it illegal to use an airplane to select a specific animal for harvest in addition to the other suggested restrictions.



WILD SHEEP
Foundation

January 27, 2015

Chairman Spraker and Members of the Board of Game:

As the primary advocate for sheep hunters, wild sheep, and their habitat, the Wild Sheep Foundation (WSF) is very interested in Dall's sheep management in Alaska and appreciates the opportunity to provide these recommendations to the Board of Game related to Dall's sheep Management for the upcoming Southcentral/Southwest meeting February 13-20.

Recommendations. Rather than provide comments on specific proposals WSF would like to share the following recommendations. We believe they are consistent with the Board deliberative and measured approach to developing a new management strategy for Dall's sheep management and sheep hunting in Alaska.

Rewrite the Dall's Sheep Management Plans statewide. We strongly suggest that the BOG direct the Division of Wildlife Conservation to review and rewrite all Dall's Sheep Management Plans statewide. Alaska's current plans, created pre-ANILCA and pre-Owsichuk, are almost 40 years old and were written before many of the current biologists were born. The Plans are used inconsistently or not at all and do not consider major changes in the regulatory landscape (e.g. ANILCA and the Owsichuk Decision) over the last several decades. Federal Conservation Units created by ANILCA reduced the statewide huntable sheep population by up to 30% and the Owsichuk Decision eliminated Guiding Concessions on State Lands causing crowding of guided hunters in some areas. A contemporary set of Dall's sheep Management Plans are needed to provide relevant and consistent guidance to wildlife managers and to frame future sheep hunting decisions. This objective should be the first priority of the Department, and the Board should avoid being pressured into making decisions affecting hunter opportunity until the new Management Plans are in place.

These challenges are not unique to Alaska. The Wild Sheep Foundation hosted an international Thinhorn Summit in April 2014 in Richmond, BC attended by wildlife agencies and stakeholders from Alaska, Northwest Territories, Yukon Territory, and British Columbia. Other than preventing disease transmission from domestic stock to wild sheep, the most identified need from state and provincial agency managers and other stakeholders was the need for updated management plans range-wide for thinhorn sheep.

Continue to educate the public on the facts and figures of sheep hunting in Alaska.

Encourage ADF&G to continue and expand the efforts to educate the sheep hunting public about ongoing actions and the base facts used in the decision making process. This will help to dispel common misconceptions and eliminate the rampant myths of sheep hunting. We watched at the Hunter Survey Results presentation in Anchorage when the audience applauded the ADF&G portion of the presentation because someone took the time to tell them what the facts were.



These facts and figures should be expanded and made more readily accessible to better serve the public and also to prevent groups and individuals from presenting erroneous, anecdotal, and partial pictures of the situation, (Tell your own story or someone will be happy to tell it for you).

Take No Action on the Current Sheep Hunting Proposals - maintain status quo for one year. The sheep hunting public, the Department, and the Board of Game are best served by not approving any action on the current Dall's sheep proposals. Although some of the proposals may provide short term solutions to current public concerns, they do not have universal acceptance and WSF believes Alaska's Dall's sheep and sheep hunters deserve a well thought out, long-term solution. The basis of a long term solution has to be the revised Sheep Management Plans. Not all of the current and long term issues will be directly solved through the revision of Sheep Management Plans, although the plans will serve to frame their solutions. Some of the more challenging allocation decisions are examples. For this reason WSF recommends the use of a Sheep Hunting Working Group to develop long range and creative solutions to those problems and to help build consensus in conjunction with the revised Management Plans.

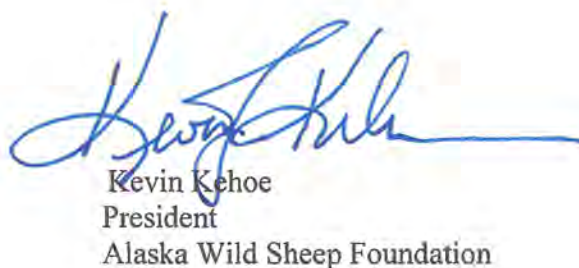
The Wild Sheep Foundation is prepared to assist. The Wild Sheep Foundation is prepared to assist with financial, technical and labor resources. We understand the potential for budgetary constraints and the challenges of a relatively short time line. We recently auctioned the Chugach Sheep Tag for \$190K at our national convention with the bulk of those funds coming directly back to the State of Alaska for wildlife management. We will also facilitate the sharing of best practices and creative solutions from across thimhorn country including the Canadian provinces. We stand ready to leverage the talents and corporate reach-back of the Wild Sheep Foundation to assist in the solutions to these challenges.

Conclusion. WSF is sure the BOG understands that these decisions on sheep hunting may be the most important made in a generation. We seek a commitment from the Board and Wildlife Division to undertake the revision of Dall's sheep Management Plans over the next year with a goal to have official documents and a suite of proposals submitted to the Board for approval by the Statewide Board of Game Meeting in 2016. We are confident that maintaining status quo for one year will allow for the development of plans and the development of comprehensive creative solutions to current issues. Continuing to educate the public during this year will help to build consensus and provide for smoother interactions during the public process. WSF is committed to supporting this process in every aspect, including financial, labor, and technical assistance if necessary.

Sincerely,



Gray N. Thornton
President & CEO
Wild Sheep Foundation



Kevin Kehoe
President
Alaska Wild Sheep Foundation



Submitted By
Cleve Cowles
Submitted On
1/28/2015 12:15:19 PM
Affiliation
Self

Dear Board of Game:

I am opposed to Proposal #208, to convert general season sheep hunts to limited drawing hunts. The proposal provides no sustained yield basis or other wildlife management basis for reducing availability of sheep hunts to the public. A perception of resource user conflicts does not justify such a sweeping change. There is plenty of room in the vast sheep habitats of Alaska for hunting by different users without conflict. Restricting the hunts to drawing hunts will reduce effective management of sheep in Alaska. This sounds like a proposal from somebody who wants to deny me a chance to hunt based purely on their selfishness.

Further, if the general sheep seasons are eliminated a non-competitive price of a sheep drawing permit could escalate to a prohibitive amount making sheep hunting only a very rich person's opportunity. ADF&G could see this as a money-making opportunity where management toward scarcity could become the goal in order to drive prices up.

Such a precedent-setting change could be copied to potentially limit access to other species in the future.

Please do not approve the poorly-justified Proposal #208.

Thank you for your consideration.

Cleve Cowles



Submitted By
Israel Payton
Submitted On
1/28/2015 3:55:15 PM
Affiliation
Mr.

Phone
9073544576

Email
truewildernessadventures@yahoo.com

Address
7702 Stillwater Cir
Wasilla, Alaska 99623

I am opposed to proposal 207 that limits the use of aircraft during sheep hunting season.

I am also opposed to any resident sheep limitations without first limiting non-resident hunters.

Thank you,

Israel Payton



Submitted By
Seth Skogstad
Submitted On
1/29/2015 7:35:25 AM
Affiliation

Phone
907-440-2819
Email
907seth@gmail.com
Address
Po box 4707
5855 n Yale ct
Palmer, Alaska 99645

In regards to proposal 208:

I oppose your proposal of 208, option 1, option 2, option 3, and option 5. I don't feel the options given are fair for resident hunters. Option 5 is telling us who we can and can not hunt with and I don't feel that is the right way to do this. I think the following amendment to option 4 would both allow hunters to continue the hunting practices they choose to and help the sheep numbers increase. I support option 4 given the following changes.

Support as amended:

Hunters can apply for a "lottery" draw permit hunt, if drawn they can not apply for a registration hunt that same year. Hunters that where not drawn for a permit can register for 1 of the 3 pre-seasons in August. Hunters must wait 2 regulatory years before they can register for that same pre-season hunt. Hunters can register for 1 of the 2 pre-seasons that they did not register for the prior year.

- a. Stays the same
- b. Stays the same
- c. Stays the same
- d. Stays the same

I support option 1 for Non-resident hunters.

Support amendment to proposal 208:

Raise permit fees for both sheep and goat for resident and non-resident hunters from \$5 to \$10.

Seth Skogstad



Submitted By
Richard Fuelling
Submitted On
1/28/2015 10:48:43 AM
Affiliation

Phone
907-457-4154

Email
fuelling77@gci.net

Address
308 Snowy Owl Lane
Fairbanks, Alaska 99712

Ref. Dall Sheep Hunting proposals

My comments are not toward any one proposal, but rather toward how the overall present Dall sheep hunting situation appears to me. I'm 68 years old and have lived and hunted in Alaska 42 years. My first Dall sheep hunt was in the Wrangel Mountains in the 1970's and since then I haven't missed many years being in sheep country, not always successful, but always greatfull for still having that opportunity. It seems like most of the recent sheep proposals are centered around complaints that ones hunting area is getting over crowded and sheep hunters can't get a quality hunt. I do believe that there may be areas that are experiencing that problem, like areas of 20A, and maybe a few other locations that are more easily accesible to hunters, but I don't believe the crowding issue is so widespread that it deserves a blanket one fits all solution. On the thirty some sheep hunts that I've been on, outside of seeing a very few individuals at a landing site or on a highway take off point, my son and I, after getting away from these take off points and establishing a base camp have never ever (ever) seen another hunter in the drainages that we've hunted. To us, dall sheep hunting is the ultimate hunt here in Alaska and should be treated as such, which includes a lot of pre-hunt physical preparation, Sheep hunting is hard work and that makes the reward that much better. I believe that a lot of the complaints being brought forward are from individuals who aren't willing to put that extra effort into it I keep hoping one of these trips that as I get dropped off at a strip that there 1/2 mile away up the moutain is that old 12 year old double broomed monarc just waiting for me to come put him out of his misery, but I'm not counting on it. Their's no doubt that some changes will have to be made at some point in the future, simply because we have seen our available hunting areas for dall sheep drastically reduced in just the 40 some years I've been here and it may not be over yet. I used to fly out of the Glennallen area with Ken Bunch into a grand place in the Wrangel Mts, now that area, thanks to President Carter with help from John Denver, is off limits to me and thousands of other hunters. So goes the same with the native lands claims areas and other priavte holdings, so now we're funneled into less and less country. The sheep populations havn't changed much over the years, most have ups and downs that have little to do with hunting pressure, In the area my son and I have hunted the past 7 years we would see an average of 20-30 rams a trip, but this past year that number was down by half or more because of winter conditions, and like I said before, we saw no other hunters in that area. You on the board of game have the most up to date info that hunters, advisory boards , ADF&G ect. have to offer, study it and go slow, Once a drawing system is intiatiated it will be here for ever, once a law is put in place it's hardly ever repealed, Take a look at the game regulation book that was in place in 1975 versus what we have now. Thanks for your time and thanks for serving the state of Alaska. Dick Fuelling, Fairbanks



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

January 27, 2015

Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Game:

This is concerning proposals number 207 and 208 scheduled for the Board meeting in Wasilla in February.

On behalf of Territorial Sportsmen, Inc. we wish to state that we oppose the adoption of these two proposals as they are a major departure from the types of sheep regulations that have been adopted in the past. Past regulations have utilized the time and area zoning concepts to provide the maximum opportunities for resident and non-resident hunters to hunt. We are opposed to putting residents on permit drawings statewide as this severely restricts their opportunities to hunt during limited times of the year.

If the Board is going to so severely limit opportunities for resident hunters, then we recommend drastic reductions in the number of permits for non-residents.

Since the proposed regulation would constitute a major change in the way the state conducts sheep hunts, we recommend that these proposals be aired properly and long enough for the public to see precisely what is being proposed. This limited window available for comments is totally inadequate. Hopefully, these will not be adopted in February or March of this year, and more opportunity will be given to the hunting public to consider the consequences of such a change.

Territorial Sportsmen, Inc. is one of the oldest sportsmen/conservation organizations in the state with a membership of over 1,600.

Thank you for considering our input.

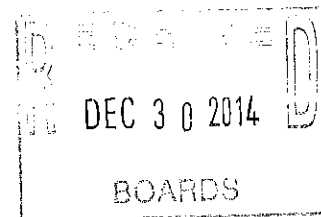
Sincerely,

Jerry Burnett

President, Territorial Sportsmen, Inc.



William D. Rice, Jr. & Ann L. Williams
24331 Wilma Circle
Eagle River, AK 99577
(907) 696-0221



ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Chairman Ted Spraker:

My wife, Ann "Lulie" Williams and I are avid upland bird hunters. We are active members of the Arctic Bird Dog Association, the North American Versatile Hunting Dog Association, and past members of the Ruffed Grouse Society, numerous dog mushing clubs in Alaska, and past presidents of the Anchorage Skijor Club. We are commenting on board proposals #95 and #194, which are to be addressed at Board of Game meetings this winter. Please take our comments into consideration when deliberating on these two proposals.

PROPOSAL 95 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan, shorten the season, and add a no-hunt corridor along the roads in Unit 13B as follows:

Unit 13B five ptarmigan per day, 10 in possession [10 per day, 20 in possession] August 20-March 31; except that from January 1-March 31 there will be a five mile (2.5 miles either side of the road) no-hunting corridor along both the Denali and Richardson Highways.

The reason for this proposal from the Paxson AC is to address inadequately protected ptarmigan populations in subunit 13B, especially along the roadside. Reportedly ptarmigan densities off the Denali and Richardson highways are healthy, while those along the road are not. The current August 10 opening date does not protect juvenile birds. The early closure (November 30) does not allow for late season hunting, which is more likely to target populations farther from the road system. The present bag limit (ten per day, 20 in possession) is too liberal if we couple it with extended season dates.

While we agree the ptarmigan populations along roadsides have been stressed and that changes are needed, we disagree with the entirety of the proposed solution. Ptarmigan hunting has improved in 13B since the winter closure after November 30. We can support a reduced



bag limit at 5 ptarmigan per day and 10 in possession and a later opening date of August 20 to protect young of the year, but we think the winter closure after November 30 in this area is still warranted. We hike with our pointing dogs, mostly in September, and we do not clean out the birds we encounter.

In short, we **Support proposal #95 with modification. Reduce the bag limit to 5 ptarmigan per day and 10 in possession and change the opening date to August 20 as proposed, but retain the closure after November 30 in Unit 13B.**

Proposal 194 – 5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for South-central Region as follows:

Add a new line to 5 AAC 92.080

The following methods of taking game are prohibited:

(X) Use of a hunting dog after October 31 for the taking of upland game birds in the South-central Region.

The reason for this proposal is to prevent hunting dogs being caught in lawful traps, (during trapping season) while they are being used for hunting upland game birds.

While we appreciate the intent of the proposer Al Barrette to eliminate hunting dogs from being caught in lawful traps, we whole-heartedly disagree with the proposed solution. This proposal, if passed, would discriminate against lawful upland bird hunters, but other dogs could be caught in traps, such as those running free with skiers, snowshoers, hikers, skijorers, mushers, and others. We think other solutions would be better. Many outdoor groups invite the Alaska Trappers Association to present programs on how to recognize trapping areas and how to release dogs from traps, including conibear traps. Furthermore, we think trappers should mark the beginning and end of trap lines or individual trap sets (not unlike required signs for black bear bait stations) to give other legal travelers in the area fair warning of what is ahead. We understand many trappers are reticent to do so because traps have been vandalized, but disturbing a legal trap is strictly illegal. We think official trap line markers, similar to the bear bait station signs, would be adequate, especially if lawful information is provided and heavy fines are posted for vandalism. Most people would choose to avoid a series of traps with free ranging hunting or running dogs if they know the sets are present. We have personally turned around several times with our hunting dogs where we have seen black bear bait station warning signs along trails. We would do the same for trap sets. We are not interested in disturbing a set, nor are we interested in putting our dogs at risk. We think



trappers should avoid setting traps immediately adjacent to popular public trails and roads. A reasonable distance should be established, especially in South-central Alaska where thousands of people and their dogs ply the backcountry year around. We are not against trapping, and we both gladly wear winter furs while mushing dogs or snowmobiling in winter.

We **Oppose Proposal 195** in its entirety. We think better solutions are available, such as education and trap line markers.

Sincerely

William "Bud" Rice

William "Bud" Rice

Ann "Lulie" Williams

Ann "Lulie" Williams



Ahtna, Incorporated



January 19, 2015

Alaska Department of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 998115526

To Administrative Staff:

Attached are Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the 2015 proposals for the 2015 February Alaska Board of Game – Central/Southwest Region meeting in Wasilla, Alaska.

Please forward them to the directors of the Alaska Board of Game.

Sincerely,


Roy, S. Ewan, Chair
Ahtna, Inc.
Customary & Traditional Use Committee





GLENNALLEN AREA – UNITS 11 & 13 PROPOSALS:

Proposal 58 – 5 AAC 92.110. Control of Predation of Wolves. By the Paxson Advisory Committee. Change the wolf population trigger for intensive management in Unit 13 as follows:

Comments:

No Comments on Proposal 58.

Proposal 59 – 5 AAC 92. 108. Identified big game prey populations and objectives. By the Paxson Advisory Committee. Reduce the moose population and harvest objectives in Unit 13B as follows:

Comments:

No Comments on Proposal 59.

Proposal 60 - 5 AAC 85.045. Hunting seasons and bag limits for moose. By Alaska Dept. of Fish & Game) Reauthorize the antlerless moose drawing permit in Unit 13 as follows:

Comments:

We oppose Proposal 60. If there are too many cow moose in Unit 13A, cow moose will find nutritional sources elsewhere. Cow moose have the capacity to move to other areas to feed themselves, based upon traditional Ahtna knowledge. Cow moose have sustained themselves and will continue to do so without intervention from the department.

Killing cow moose that may have a calf is not the practice of the Ahtna People. Cow moose may have a calf with it and accidentally shooting it will leave the calf an orphan.

In the 1970s, there was an open season on cow moose, moose population crashed to a very low number. Too many cow moose were killed, which depleted the moose population. This may happen again, if too many cow moose are killed by residents and non-residents.

Proposal 61 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Clint Mayeur. Change the Unit 13D moose drawing hunts (DM335-DM339) to registration hunts as follows:

Comments:

We oppose Proposal 61. Changing drawing permits to a registrations permit hunt in Unit 13D will increase moose harvest. There are not enough moose to sustain a registration hunt. More hunters will sign up for a registration permit and harvest the maximum bag limit allowed in the regulatory Unit 13D moose drawing hunts. Community Subsistence Hunt in Unit 13A for Any Bull Moose was closed within 4 days, after the CSH hunt began, in Unit 13B, Any Bull Moose was closed 5 days, after the moose season opened. Hunters have an impact on local hunters in Unit 13D during the moose hunting season. More hunters will take advantage of this opportunity to hunt under a registration moose drawing hunt.

Proposal 62 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Claude Bondy. Open a nonresident caribou drawing hunt in Unit 13 as follows:

Comments:

We oppose Proposal 62 to open Unit 13 Nelchina Caribou hunt to nonresidents. The problem of harvesting a caribou is not a lack of trying to harvest a caribou; it is the migration route of this herd that has changed and the timing of this herd crossing the highway. Nelchina Caribou herd cross the Richardson Highway after the fall hunting season ends; it is difficult to harvest a caribou when they are inaccessible. During the fall hunting season, caribou are in the higher elevation, which makes it impossible for some local CSH hunters to harvest a caribou.

Opening up the Unit 13 Nelchina Caribou hunt to non-residents will create more havoc in the field during the fall hunting season. Non-residents can hunt for caribou in other regions of the state where the bag limit is more than 5 caribou.

Proposal 63 – 5 AAC. 85.025. Hunting seasons and bag limits for caribou. By David Luke. Limit the drawing permits for caribou (DC480-483) to two permits per household as follows:

Comments:

We oppose Proposal 63 to “limit drawing permits for caribou (DC 480-483) to two permits per household”. Tier I – Unit 13 Nelchina Caribou hunt is open and hunters can apply under the Tier I to hunt for caribou in Unit 13 or they can apply for the Copper Basin Community Subsistence Hunt.

Proposal 64 – 5 AAC. 85.025. Hunting seasons and bag limits for caribou. By George Esslinger. Divide the resident fall caribou hunt (RC566) into late and early season as follows:



Comments:

We oppose Proposal 64. Splitting the caribou hunting season to an early and later fall hunt will not make a difference to impact of hunters in Unit 13. Non-local hunters will be in the field hunting for moose. During the moose hunting season, there is an influx of hunters from non-local areas that hunt in Unit 13. Non-local hunters cause the impact during the hunting season. Nelchina Caribou Herd has been crossing Richardson Highway for the last several years, after the caribou hunting season ends, a later caribou hunting season will not do much for hunters hunting in September month. Caribou are in rut in October and are not good to harvest or consume.

Proposal 65 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations.

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 66 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Require participants in the community subsistence harvest (CSH) program to commit to participation for a period of two years or more as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 67 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Limit the areas where community subsistence harvest (CSH) hunters may hunt outside of Unit 11, Unit 12 and 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 68 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Change the community subsistence harvest (CSH) group size to "25 or more households" as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 69 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Include "individuals, households, or families" (recognized as a subsistence use pattern in the 2011 Board of Game Findings) in the moose subsistence hunt when the harvestable surplus exceeds the Amount Necessary for Subsistence (ANS), and change the hunt start date to September 1 (from August 10) as follows.

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 70 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Provide definitions for "community" and "individuals, families, or "other social groups" as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 71 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Implement a system to ensure communities or groups approved to participate in the moose and caribou community subsistence harvest (CSH) program meet the intent of the Board of Game Findings for the program as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 72 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Follow the same basic guidelines as the old Tier II system (points to each community based on past use of resource) as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.



Proposal 73 – 5 AAC 92.071. Tier I subsistence permits. . By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Require hunters to be engaged in a pattern of subsistence uses of Nelchina caribou for the Tier I hunt as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 74 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Require direct approval by the Board of Game of groups applying to join the Copper Basin community subsistence hunt as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 75 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Implement reporting and antler destruction requirements for community subsistence harvested moose in the Unit 13 hunt as follows:

Comments

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 76 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Require antlers taken through the community subsistence harvest (CSH) hunt be turned in to ADF&G as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 77 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Establish a quota for each subarea in Unit 13 for the “any bull” moose hunt as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 78 - 5 AAC 85.045. Hunting seasons and bag limits for moose. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Require more rapid harvest reporting of moose taken under the “any bull” hunt in Unit 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 79 - 5 AAC 85.045. Hunting seasons and bag limits for moose. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Direct AD&G to open and close “any bull” moose season on certain days in Unit 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 80 - 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.072. Community subsistence harvest hunt area and permit conditions. . By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Modify the community subsistence moose hunt season dates and restrict all hunters from using motorized vehicles in Units 13, 11, and portions of Unit 12, during the periods August 18-22 and August 25-28 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 81 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Restrict community subsistence harvest hunters in Units 13, 11, and portions of Unit 12 from hunting within 24 hours of using off-road vehicles as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 82 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Manage the Unit 13 community subsistence caribou hunt through the set season as long as the overall harvest quota is not exceeded.



Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 83 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By the Board of Game Committee on Copper Area Subsistence Hunting Regulations. Discontinue the community subsistence harvest (CSH) program when the harvestable surplus exceeds the minimum Amount Necessary for Subsistence (ANS) and replace it with a weighted drawing permit for Alaska residents only.

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 84 - 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions. By Alaska Outdoor Council. Change the "any bull" in Unit 13 to a drawing hunt as follows:

Comments:

We oppose Proposal 84 to change the "any bull" CSH moose hunt to a weighted drawing permit hunt. Copper Basin Community Subsistence Hunt is a subsistence hunt, which provides a reasonable opportunity and longer hunting season to harvest a moose. Community Subsistence Hunt is based upon Ahtna's customary and traditional way of life and subsistence uses of caribou and moose.

Changing "any bull" moose hunt will to a "weighted drawing hunt" will eliminate the subsistence preference in the CSH hunt. A "weighted drawing hunt", such as described in this proposal will create a hunt in which individual hunters will have to wait his or her turn after winning a drawing permit to become eligible to hunt again.

Changing the "any bull" moose CSH hunt to a weighted drawing hunt is based upon a lottery system; it is not a community based subsistence hunt and will not provide a reasonable opportunity to harvest a moose. A community based subsistence hunt that follows customary and traditional use and patterns provide "economic, cultural and social" benefits to subsistence hunters.

Proposal 85 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Kenneth Manning. Modify community subsistence harvest permit system as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 86 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Kenneth Manning. Divide the annual harvest quota for Nelchina caribou as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 87 - 5 AAC 92.050(I). Required permit hunt conditions and procedures. By Kenneth Manning. Remove the exclusive hunting restrictions for caribou in Unit 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 88 - 5 AAC 99.010. Boards of Fisheries and game subsistence procedures. By Kenneth Manning. Change the method of determining the Amount Necessary for Subsistence in Unit 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 89 - 5 AAC 99.070. Tier II subsistence hunting permit points system. By Kenneth Manning. Change the eligibility criteria for all Tier II subsistence hunts in Unit 13 as follows:

Comments:

Comments will be submitted at the ABOG Central/Southwest Region IV meeting.

Proposal 93 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Aron Blumquist. Allow brown bears to be taken over bait in all of Units 11 and 13 as follows:

Comments:

We support Proposal 93 to "allow brown bears to be taken over baits in Unit 11. Brown bears in Unit 11 as well as Unit 13 are perceived to be at a healthy population. Taking brown bear sow over bait station in Unit 11 will not be detrimental to the population of brown bears in Unit 11. Sows have cubs every four years; this will not affect the productive rate of producing cubs or the population of brown bears.



Brown bears kill calves of Mentasta Caribou Herd. Mentasta Caribou Herd is at a low population of 344. Predators, such as wolves and brown bears are depleting the Mentasta Caribou Herd population.

Proposal 94 – 5 AAC 85.015. Hunting seasons and bag limits for black bear, and 85.020. Hunting seasons and bag limits for brown bear. By Mat-Valley Fish and Game Advisory Committee. Open a fall season for hunting brown and black bear over bait in Unit 13D as follows:

Comments:

We support Proposal 94 to “open a fall season for hunting brown and black bear over bait in Unit 13D from August 25 to October 15. Unit 13D has a healthy population of brown and black bears. Adding an additional baiting season will benefit local people through baiting of bears.

Proposal 95 – 5 AAC 85.065. Hunting seasons and bag limits for small game. By Paxson Fish and Game Advisory Committee. Reduce the bag limit for ptarmigan, shorten the season, and add a no-hunt corridor along the roads in Unit 13B as follows:

Comments:

We opposed Proposal 95 to “reduce the bag limit for ptarmigan, shorten the season and add a no-hunt corridor along the roads in Unit 13B”.

The Alaska Board of Game opposed this proposal in the past. Ten per day and 20 in possession with a hunting season – August 20 – March 31 will provide additional harvest of wild resources. It is not necessary to shorten the season or bag limit and adding a no hunting corridor along the Denali and Richardson Highway from January 1 to March 31st.

Proposal 198 - 5 AAC 85.045. Hunting season and bag limits for moose. By Copper Basin Fish and Game Advisory Committee. Modify the cow moose drawing hunt for Unit 13 as follows:

Comments:

No Comments on Proposal 198. See Proposal 60.

Proposal 199 – 5 AAC 92.121. Intensive Management Plan. By the Copper Basin Fish and Game Advisory Committee. Modify the intensive management plan for the Unit 13 wolf predation control area for Unit 13 as follows:

Comments:

We support Proposal 199. Wolf Control Program in some units of Unit 13 has been successful and the moose population has increased. Reducing the wolf control program from 135 to 100 wolves will help to keep wolf population stabilized. Wolf control program should be slowed or stopped in subunits of 13. Trapping and wolf hunting season should not be stopped when the predator control program ends for the season.

Proposal 200 – 5 AAC 92. 108. Identified big game prey populations and objectives. By the Copper Basin Fish and Game Advisory Committee. Modify the moose population and harvest objective for Unit 13 as follows:

Comments:

We support Proposal 200 to “modify the moose population and harvest objective for Unit 13 to change the moose population objective range and harvest objective range so that the moose population and harvest objective range will be more exact and in line with each other.

REGIONAL AND MUTIPLE UNIT PROPOSALS:

Proposal 125 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Alaskan Bowhunters Association. Open a season day moose season for bowhunting following the general season hunts in Unit 11, 13, 14A, 14B, 16 and 17 as follows:

Comments:

We oppose Proposal 125. We oppose the creation of another special hunt on an already stressed area. Bow hunters have an ample opportunity to hunt during the regular hunt along with everyone else.

Proposal 126 – 5 AAC 92. 015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

Comments:

No Comments on Proposal 126.

Proposal 127 – 5 AAC 92.220. Salvage of game meat, furs, and hides. By Anchorage Fish and Game Committee. Remove the meat salvage requirements for brown bear over bait in Central/Southwest Region as follows:

Comments:

We oppose Proposal 127. The removal of meat from bait stations is important for safety reasons.



Proposal 128 – 5 AAC 92.220. Salvage of game meat, furs, and hides. By Joel Doner. Remove meat salvage requirements for brown bear taken over bait in the Central/Southwest Region Units as follows:

Comments:

See Comments on Proposal 127.

Proposal 129 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. By John Frost. Remove the requirement to clean up contaminated soil from bear bait stations in the Central/Southwest Region Units as follows:

Comments:

We oppose Proposal 129. It is a safety and environmental concern to clean up the bait stations.

Proposal 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. By Mat-Valley Fish and Game Committee. Allow same-day airborne hunting of wolves and coyotes as follows:

Comments:

We support Proposal 130 to “allow same-day airborne hunting of wolves and coyotes. There are too many wolves and coyotes in Unit 11 and Unit 13. Hunters should be allowed to shoot coyotes and wolves same day airborne.

Proposal 132 – 5 AAC 92.010. Harvest tickets and reports. By Sea Ducks Limited. Require harvest reporting of migratory birds by species in Central/Southwest Region Units as follows:

Comments:

We support Proposal 132 to “require harvest reporting of migratory birds by species in Central/Southwest Unit 11 and Unit 13. Reporting harvest of migratory birds in a timely manner will provide good data on harvest of these birds.

Proposal 133 – 5 AAC 92.080. Unlawful taking of game; exceptions. By Jake Spankle. Remove the restriction against using felt sole waders while hunting in Central/Southwest Region Units as follows:

Comments:

We support Proposal 133. We support it as this is an ineffective method. It is important that elders be able to wear safe footwear.

Proposal 134 – 5 AAC 92.003. Hunter education and orientation requirements. By John Frost. Require certification for big game hunters using crossbows in Central/Southwest Region as follows:

Comments:

We support Proposal 134. Animals could be wounded by inexperienced hunters.

Proposal 135 – 5 AAC Chapter 85. Seasons and bag limits. By Kevin Secor. Add five days to all resident hunting seasons and allocate 75% of the drawing permits to residents for the Central/Southwest Region as follows:

Comments:

We oppose Proposal 135 to “add five days to all resident hunting season and allocate 75% of the drawing permits to residents for Central/Southwest Region” [as follows]. We support the Copper Basin Community Subsistence Hunt and preference that it provides, longer hunting season for moose, any bull moose and legal size bull moose, and quota for caribou and moose.

INTERIOR REGION – REAUTHORIZE PROPOSALS

Proposal 138 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. By Alaska Department of Fish & Game. Reauthorize the antlerless moose seasons in Unit 20A, 20B, and 20D as follows:

Comments:

See Comments under Proposal 60. We do not support hunting cow moose.

Proposal 139 – 5 AAC 92.015(a)(4). Brown bear tag fee exemption. By the Alaska Department of Fish & Game. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska as follows:

Comments:

No Comments on Proposal 139.



Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708



ATTN: BOG COMMENTS
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

January 13, 2015

Dear Chairman & Members of the Board:

On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your February 2015 Region IV meeting in Wasilla.

Proposals #55 and #56 recommend a liberalization of both bag limit and methods & means for harvesting beaver in Game Management Unit 17. Proposal #57 recommends restrictions on the same population. With all due respect to our fellow trappers in GMU 17, we OPPOSE all three proposals:

- We are opposed to use of bow and arrow to harvest beaver. We envision significant wounding loss.
- Use of firearms to harvest beaver in this area was initially introduced as a way for remote trappers to obtain fresh meat. Use of firearms was never intended to become the primary method of harvest. We firmly believe that traps and snares should remain the primary method of harvest.
- The three proposals disagree on the length of the season. In cases where two individuals or groups are requesting widely divergent seasons, the best solution might be a compromise in the middle. The Game Board (in their wisdom) selected the middle ground currently on the books in GMU17. We suggest that the current season length be retained.

We also oppose proposal #104 which would create a year-round hunting season for beaver in Game Management Unit 16B, with no bag limit:

- As stated above, we don't support the use of firearms becoming the primary method to harvest beaver.
- Our members tell us that there is significant harvest of beaver in GMU 16B by use of traps and snares. As a result, they don't believe that there is any surplus remaining in the population. Extensive harvest with firearms would take the beaver population too low.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, President



Submitted By
Roger Denny
Submitted On
1/29/2015 8:12:20 PM
Affiliation

Proposal 207

1) **OPPOSE:** This is an unenforcable proposal. How is somebody from the ground or from the air able to tell in all circumstances whether I'm looking for sheep or surveying a landing site? What if I'm looking for caribou, bears or moose, as this is easily a possiblity in areas of the Brooks Range in which I have sheep hunted. The impact of law enforcement to have to investigate a complaint, as well as the impact of the pilot to have to defend an unwarranted complaint would be excessive, time consuming and potentially expensive to the pilot to defend. I fly through sheep country all the time at altitudes that are warranted for the conditions, for all kinds of reasons other than looking for sheep, and I don't want to have to defend myself or be investigated everytime somebody assumes I'm breaking the law.

2) **OPPOSE:** How is this going to grow sheep populations? I would guess that the majority of the sheep taken by folks that arrive in airplanes, have taken those sheep after 2 pm. I don't have a single ram that I've taken early the first morning or even on the first day. All the rams I've taken have been taken after the first day. If the goal is to grow sheep populations, then lets do something meaningful; limit non-residents, go to a draw permit that favors residents over non-residents. And if the populations are so bad in a unit and we really want to grow sheep, then shut it down completely, with the stipulation that once numbers improve, it will be reopened.

3) **OPPOSE:** Again, how are you going to enforce this? If you want to limit success and grow sheep populations, then start with the non-resident hunter, and/or then move to a draw permit system that gives the majority of the tags to Alaska residents.



Submitted By
Gary McCarthy
Submitted On
1/29/2015 10:38:59 PM
Affiliation
None

Phone
907-240-0863

Email
gmccarthyalaska@gmail.com

Address
21719 Chandelle Circle
Chugiak, Alaska 99567

I have hunted sheep in Alaska since the mid-70s and it saddens me to see the degradation of this activity that I hold so dear! I have been fortunate to have a career, family and resources that have allowed me to hunt all over the State. In many areas this activity has almost become a competitive sport. The quality of the sport has been lost and the maturity of the animals harvested has declined.

I have a cabin in 19C and the amount of plane spotting activity before and during the season has become widespread. Most of the Ram holding valleys are tied up ahead of time. It has become difficult for residents to compete and I'm sure this is why we are seeing a decrease in resident participation. Is this what you want?

These issues have been brought before the board for many years now and things continue to get worse. It is obvious the State doesn't have hard data but read the signs and listen to the testimony. I implore you to take action now.

Gary McCarthy



Submitted By
Brian Bagley
Submitted On
1/29/2015 1:14:28 PM
Affiliation

Dear Board of Game:

I would like to take this opportunity to comment on a couple of the dall sheep management proposals.

Proposal 109- Allowing a maximum of 10% of sheep hunt participation for non-residents.

I support this proposal. Based on the recent trends identified by the Alaska Department of Fish and Game's "Summary of sheep populations, hunters and harvest"; statewide sheep are in a period of decline. Also, in the recent report by Dr. Brinkman "Survey of Alaska sheep hunters", the majority of residents and non-residents felt that overcrowding of sheep hunters was a problem. Currently non-residents account for 40% of the sheep harvest. Allocation of no more than 10% of the opportunity to non-residents would help both of these issues and is a common management technique utilized in many states. It is a policy that has proven to be fair, and has been upheld as being legal in a court of law.

Proposal 208- Board of game submitted proposal identifying potential changes for non-resident and resident sheep hunters.

I do not support this proposal. The options for non-resident sheep hunters mentions the possibility for a draw, without a reference to what percentage that opportunity would be. If it exceeds 10% of the opportunity for non-residents, it would be considered unfair.

Also in this proposal, it mentions that non-resident opportunity would not be limited on lands managed by the National Park Service or the United States Fish and Wildlife Service, since the guide concession program already limits their numbers. It makes the assumption that the guide concession program currently limits non-residents to a "fair" amount of the opportunity, and that the harvest is acceptable and sustainable from a biological standpoint. It is also short sighted in its approach. If the sheep populations crash in these areas, as they currently are doing, the non-resident hunter numbers would not change. I don't believe there is any science factored into this exception, and I'm concerned that it is financially motivated.

The suggested options for changes to resident sheep hunters are more complex than most IRS tax codes and would not be unnecessary if the non-resident opportunity would be held at the fair and legal level of no more than 10% of the opportunity.

Appropriate wildlife management should be geared towards managing the resource, not exploiting it for financial gains. Historically, exploiting wildlife for financial gains has had poor results. For example, Stellar's sea cow, exploited for financial gains, went extinct 27 years after its discovery by Europeans. Passenger pigeon, once considered the most abundant bird on earth, exploited for financial gains, the last one died in 1914. Kenai trophy king salmon, exploited for financial gains, its story is currently being written, but it appears that history is in the process of repeating itself.

Thank you for this opportunity to comment,

Brian Bagley



Submitted By

Mike McCrary

Submitted On

1/29/2015 9:30:33 PM

Affiliation

Support ABHA proposal #111

Do not support proposal #207

Do not support proposal #208

Board member Nate Turner should be required to recuse himself from all deliberations regarding changes to sheep hunting regulations and allocation of sheep hunting opprounity due to clear conflicts of interesst. Turner has been awarded a federal exclusive guide use area for sheep (primarily) in the Brooks Range. 1) Turner neglected to disclose the fact the he controlled an exclusive federal area when providing required ethics disclosure testimony before the board of game and gave misleading testimony stating essentially that he was only an assitant guide in the Brooks Range. 2) Turner colaborated with board member Spraker to develop a board generated proposal dealing with sheep hunting regulations which stipulated the board generated proposal would not apply to federal areas.

Board member Ted Spraker should be sanctioned for attending a private closed door meeting in January 2015 at the Fish and Game offices in Anchorage with selected members of the public and the department and as a result of that meeting Spraker crafted 'board generated' proposals addressing changes to sheep hunting (which expressly stated the proposal would not apply to federal areas) and therefore Spraker should be barred from participating in discussions and deliberations related to the so called "board generated" proposals which were a result of a clear violation of the Alaska Open Meetings Act.



Submitted By
Michael Strahan
Submitted On
1/29/2015 10:56:42 PM
Affiliation
alaska outdoors supersite

I am writing in opposition to Proposal #111, which was submitted by Alaska Backcountry Hunters and Anglers, which seeks to go to a draw permit process for all of Region 3 for Dall sheep. After studying this issue for some time it appears that there is no resource-based reason for this proposal, but it seeks to control esoteric aspects of Dall sheep hunting in Region 3, namely overcrowding, by restricting nonresident guided hunters. I believe a more effective solution should 1) focus on the problem areas in Region 3, and 2) if it is determined that there is a need to reduce the number of hunters in this area (for resource reasons or to alleviate crowding), that it be done in a manner that affects both residents and nonresidents proportionally to the number of hunters in each group.

Thank you for your consideration.

Michael Strahan

Owner, Alaska Outdoors Supersite (formerly Outdoors Directory)

www.alaskaoutdoorssupersite.com



Submitted By
Jerry Hupp
Submitted On
1/30/2015 8:16:30 AM
Affiliation

Phone
907-242-1140

Email
huppjerry@gmail.com

Address
2627 Ingra St
Anchorage, Alaska 99508

Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 11526
Juneau, AK 99811

Dear Chairman Spraker,

I support Proposal 105 which will set aside approximately 1,360 acres of land for inclusion in the Palmer Hay Flats State Game Refuge. These lands were acquired and transferred to the state for the purpose of inclusion in the Hay Flats SGR. However, in the absence of legislative action, that has not yet occurred. Consequently, ADF&G lacks full management authority to regulate access and use on these lands. Passage of this proposal will help complete the work of those that secured these lands for conservation and sporting purposes.

Sincerely

Jerry Hupp
2627 Ingra St.
Anchorage, AK 99508



Submitted By
Loren J Karro
Submitted On
1/30/2015 9:21:51 AM
Affiliation

Phone
907-745-3712
Email
lorenk@mtaonline.net
Address
26239 E Buckshot Dr.
Palmer, Alaska 99645

Proposal 108, Guide Client Contract: I support proposal 108. During the last board cycle the board requested that the Department of Commerce, Community and Regional Affairs come up with a way to identify which guides were qualified to enter clients in which hunts. This has been done, with the issuance of a Unique Verification Code (UVC), which was integrated into the 2014 Fish and Game limited draw application procedure. I see no reason not to keep this requirement now that the onus of proof of guide eligibility has been shifted from the Department of Fish and Game. For the Board or their legal advisor to say that they are not legally able to require the Guide Client Contract is in direct contradiction to the fact that there is this requirement for the Kodiak bear non-resident applicants and it has been in place for many years. Not requiring this contract can also open up the draw permit process to inundation by the animal rights/non-hunter groups.

Proposal 106 and 107: I support these proposals. The full curl harvest strategy has worked well for the rest of the state and these two areas should be returned to that limitation (full curl, 8 years old or both horns broken). This is particularly important with the severe decline in sheep numbers in the Chugach, which while shown not to be the result of overhunting, could be further harmed if rams which haven't had the chance to reproduce are taken from the population prematurely.

Proposals 109-124: I oppose all of these proposals. The same proposals have been submitted for many years and most of them are written by the same 3 people. I believe very strongly that the Department of Fish and Game needs to develop a comprehensive Sheep Management Plan before instituting more allocation restrictions; and that the Department should form a sheep working group that would be inclusive of management, research and user groups. In the interim the Board should stick to its stated policy of, when limited allocation is required for drawing permits, limiting non-residents to the 5 year average of harvest percentages.

Proposal 207: I strongly oppose this proposal. In all of my years hunting and guiding for sheep, I have never had a buzzing airplane so disturb a targeted sheep that we could not harvest it. The only time this ever happened was last year when a National Guard helicopter spooked a band of rams so badly that they were never seen again; and that would not be covered by this regulation anyway. As a matter of ethics, most of us refrain from flying low and slow once the season has begun. I believe that this flying restriction would be unenforceable and have been told that the Dept. of Fish and Wildlife Enforcement do not endorse it. The wait longer until you hunt portions of this proposal do not address the problem in any way, and would make for longer, unnecessary waits on the mountain. All sheep hunters would need to schedule longer vacations just to factor in this period.

Proposal 208: I oppose all alternatives in this proposal at this time. As I mentioned earlier, I believe that before these allocation and scheduling issues are decided, the Department should have a comprehensive sheep management plan and should form a sheep working group. Any such regulations should be based on a plan that would be good for the long term, so that these decisions do not have to be addressed every year. I think the various groups can work to suggest long term solutions to any problems. As the sheep survey pointed out, while overcrowding appears to be the single biggest complaint of sheep hunters, 80% of the hunters in the field are residents, not guided non-residents. The 'over-crowding' by non-residents is therefore a perceived more than actual problem.

Thank you for the opportunity to comment.

Submitted By
Wayne Heimer
Submitted On
1/30/2015 12:26:49 PM
Affiliation
Self

Phone
907-4567-6847
Email
weheimer@alaska.net
Address
1098 Chena Pump Road
Fairbanks, Alaska 99709

BOG Testimony: Wayne E. Heimer, 1098 Chena Pump Road, Fairbanks, Alaska, 99709

During the last three Board of Game cycles, a cadre of activist resident hunters have flooded the Board with repeated proposals to limit Dall sheep hunting opportunities for others while enhancing opportunities for themselves. These proposals are odd because there is no reason to restrict hunting opportunity. Harvest statistics over the last 20 years show resident hunting success for Dall sheep is as high as ever, average horn size is higher than ever, and the documented harvest rate is about half of what is known, with certainty, to have been available. None of these statistics indicates a shortage of harvestable rams. The fact that the Board of Game has focused on these proposals from activist residents represents an unprecedented level of success for the ever-smoldering resident resentment for guides and nonresidents.

While I do not approve of such apparent selfish interest, I have come to understand that the Board of Game mechanism exists to accommodate just such self-interest. Although the avalanche of xenophobic proposals has accumulated over the last few years, the story goes back much farther than most realize. Here's some ancient history:

Following harshly-imposed "top down" management by the federal government in territorial days, the emerging State of Alaska reacted by assuring local interests would always receive full consideration in the formation of game harvest regulations. The mechanism for this assurance was our "Board of Game/Fish and Game Advisory Committee System." If left unchecked, this system virtually assures that non-locals will always be "voted off of the island." That's what humans do. Local interests are generally contrary to the general public interest so the framers of Alaska's Constitution established policies of maximum use consistent with scientific conservation and general public (not localized special) interest. It's a traditional, American "check and balance" system. The "check" built into our special interest opportunity allocation-Board system was the Department of Fish and Game. The Department is an extension of the Commissioner's Office.

Here's how I understand our check/balance system was designed to work. The Board of Game/local Advisory Committee system exists as part of the Legislative Branch of government. The Department of Fish and Game exists in the Executive Branch. Hence, I reason, the Board of Game is to factor local and special interest input into allocation of harvest opportunity while the Department is to uphold constitutional policy and scientific management. The two entities must work in concert to produce regulations which harmonize both public and special interests with general state policy as defined by the Alaska Constitution and Statutes. When there's a conflict, Alaska's Constitution and Statutes take precedence.

The Commissioner (via the Department) of Fish and Game is chief manager of Alaska's fish and game. Alaska Statute #16 defines his/her duties to include managing, maintaining, protecting, enhancing, and expanding the game resources of the state in the interest of the economy and general well-being of the state. That would be clear enough if there were a definition of what management is. I've never found one so I've proposed a general definition that I think may fit most situations.

I argue that management is "intervening in an established system to produce, maintain, or expand a pre-defined benefit." I think this definition fits everything from financial to wildlife management. Wildlife management has several essential components which are necessary to produce Alaska's predefined benefit, the opportunity to harvest game reserved for our common use. These components of management include research (a manager must know the details of the system he/she is manipulating), plans to assure the pre-defined benefit will result, practical regulations to assure the pre-defined opportunity benefit, and enforcement of the regulations so things work as planned. These things are not simple, which is why requirements for becoming a wildlife manager in Alaska are set high in terms of



education and experience.

That said, Departmental leadership has divested itself of progressively more management responsibilities over the years. During the 25 years I worked as a Dall sheep biologist, the Department stepped increasingly away from guiding oversight, regulation enforcement, marine mammal management, and allocation. These voids have been assumed by the Department of Commerce (guide qualifications and practices), the Department of Public Safety (enforcement), the Federal Government (marine mammals), and the Board of Game (allocation) with varying levels of conservation-related success (or failure). As a result, the remaining Commissioner's responsibilities for wildlife management are limited to field and support activities which provide information to the Board for setting the seasons and bag limits which limit allocation of opportunity to harvest. In essence, the Board of Game is slated to become the manager via its allocation function. In contrast, our traditional recipe calls for the Board of Game's to assure the Commissioner's duties are performed by allocating harvest opportunity according to existing state policy. In the absence of a Commissioner willing to engage the Board of Game, the Board's designed-in populist inclination will predictably result in situations like the present, strange Dall sheep resident preference issue.

This is not our new Commissioner, Sam Cotten's fault. Commissioners going back as far as the early 1970s have tended to shift tough decisions away from their Department to the Boards of Game and Fish. The Board of Fisheries has been the fish manager for decades already. Its dominance by commercial fishing interests gives rise to the common complaint that the commercial fishing industry manages access to fisheries in Alaska at the expense of subsistence and personal use fishers. The perennial struggle over which users will get preference at Chitina is an example.

As stated above, today's conflict between constitutional policy and resident special interests comes down to whether a minority of activist residents can secure to themselves preferential or exclusive use of Dall sheep, a resource which cannot be shown to be in short supply. If there were no other guidance, this prerogative would rightfully be exercised by the Board of Game. However, the necessary guidance should come via the Department as it insists the Board apply constitutional and statutory standards as it allocates harvest opportunity. Our situation today is the result of a series of "timid" or "disinterested" commissioners (mostly folks with commercial fishing expertise) shifting the responsibility for difficult or unpopular policy decisions to the Board of Game.

There are three ways we might solve this problem, and maintain our Board of Game as an "allocation" board rather than having it become the "management" board as has happened with the Board of Fisheries. First, we can hope that the new Walker Administration Commissioner, Sam Cotten, will engage with the Board of Game as the "check" on the Board's local-preference inclination. This will require a major shift away from established tradition for the Commissioner's office. Alternately, the Legislature (which should be overseeing its Board of Game) will have to assume the responsibility for assuring the Board follows its (the legislature's) policies. At present, the Board of Game may change policy by bowing to public pressure to limit Dall sheep hunting opportunity when there is no need to do so. This is unlikely to be popular with the Board of Game, the Department, and even the Legislature.

The other alternative I can imagine is for the Board of Game and the Department to cooperate. The mechanism for this cooperation is the management planning process. The Board and Department have existing Dall sheep management plans mutually agreed upon after public review. These management plans were among the first extensively researched, biologically-based, publicly-driven, and use-backgrounded plans made by the Department 40 years ago. A great deal has happened in the last 40 years, including the pipeline road through the Brooks Range, the subsistence movement, increased awareness of predation on sheep, creation of vast "no hunting" zones with ANILCA, and federal overreach into access and regulation which has altered the interest in Dall sheep hunting in Alaska. While Alaska's population of humans has increased dramatically, Dall sheep hunter numbers have declined 50% since passage of ANICA.

Alaska's Dall sheep management plans could clearly use a review, and most likely some revisions. My suggestion is that the Board of Game set aside the special interest proposals it will consider in mid-February, and encourage the Department to review and revise its management plans in the light of biological discovery, enhanced allegiance to established policy, and informed public opinion before considering any changes in harvest opportunity allocation between residents and nonresidents via season (or permits) and bag limit restrictions.

Wayne E. Heimer was a young Dall sheep biologist in Fairbanks when he participated in the background research, assessing public input, and drafting of the first Dall sheep management plans 40 years ago. Since that time, he has contributed significantly to knowledge and management of Dall sheep as well as being "up to his eyes" in ANILCA issues and how the State and Federal allocation Boards are supposed to work. Wayne is no longer young.



Ted, et al,

I'm sad to have to agree that there is fight." The passion and persistence demonstrated by those proposing change, the emotional populist power of the associated arguments, and the egos involved have created an "us v. them" situation. That means there's likely to be a fight. If our system worked as intended, I don't think it should have come to this. I don't think the "fight" has to be had. I suggest postponement pending a time-certain management plan review/revision lead by ADF&G represents the more rational course. I think taking that approach will limit the opportunity to "fight" among Alaskans. I recommend that as the preferred option going into February and March.

Given that there is an "agonistic interaction," I'll have to admit that I do have a "dog" in it. However, my interests are not directly associated with the full-curl, or other conventional "legacy" issues. From the beginning, I have tried to make it clear that the extant data forced us toward full curl back "in the day." I'm fully aware that the disparate data were largely of a correlative nature, and required a synthesis Division leadership was unready to embrace. However, the correlations were remarkably strong, and together the data seemed to make sense in terms of sheep biology. Consequently, I simply followed the data in my recommendations in order to maximize availability consistent with the Alaska Constitution's Statement of Policy and the duties of the Department inferred from Title 16.05.020. Any time we can do better to follow Constitutional and Statutory mandates, I'm for it. My personal preference (like everyone else's) is less important than the basic rules under which wildlife management is to operate.

If you'll accept that, I'll move on to what I think is the "dog" I have in this "agonistic interaction."

In the overview, I think I have **two major "hangups."**

The first may be reduced to process. As I wrote in the earlier "alligator/swamp" memo, I think our process is out of balance in favor of special interests rather than oriented toward the responsibility of the manager/Commissioner. That's probably because it was "assumed" the Commissioner/Department would be more active in the process. Looking back, I suggest this assumption has proven inaccurate over time and has resulted in lack of a "check/balance" relationship between the legislative and executive branches where allocation is concerned. By extension, I earlier argued this was a result of the Commissioner's office arbitrarily deciding the Department should withdraw from much of "management" (including enforcement, guide qualification, and the controversial issues attending pipeline construction, the advent of modern wolf control, and the ANILCA lands issues). The mantra of the day was, "The Department manages; the Board allocates." The result was that the Department came to view itself as a simple "information providers" to the Board. Somewhere along the line, Board proposals came to reflect special interest preference by asking "Who will benefit?" an "Who will be harmed?" rather than, "How does this comply with Constitutional and Statutory policy?" I argue this is manifest in the present sheep situation where a small group of populist, aggrieved, resident hunters (most with Advisory Committee connections/experience) has generated the impression of crisis when the existing harvest/use data show no hint of one. Based on the conclusion driven



by that axis of vocal (savvy, and persistent) activists, “we” inquired of the hunters (via Dr. Brinkman) about whether they thought there was a problem. Three quarters of the respondents said, “yes,” and accepted several “problems” proposed as causes by the questionnaire. However, many of the “problems” the hunters were invited to rank simply don’t hold up well against the harvest data.

The most popular “problem” was “too many professional guides” (as seen by residents). Certainly after Owischek established guides no longer had exclusive areas, and the impression was there were too many guides. However, looking at harvest and use data in this frame of reference shows no definable actual impact of the Owischek Decision on sheep harvest statistics. The second popular “problem” selected by respondents was, “more nonresident sheep hunters.” This does not appear to be “real” on an absolute basis. The number of nonresident hunters has remained relatively stable over time, and may actually be decreasing. The third popular “problem” selected by respondents was “fewer legal rams. While it is certain there are fewer Dall sheep than in the 1980s, hunter harvest success has not decreased. Somehow, harvest success among residents remains stable and high compared to other big game species. It’s not because residents are obviously hunting harder than ever. So, while responding hunters identified or prioritized their impressions from those suggested on the questionnaire, it is not clear that the general public wants these problems addressed. I don’t believe they were asked “if” they thought the problems should be addressed. This means we are left to infer that hunters want their impressions of crisis addressed, and the vehicle is the accumulated list of 16 proposals before the Board.

I observe that “we” aspire to a “planned management system,” but the process issues listed above and the list of 16 proposals listed on the “Additional Information on Sheep Hunting Proposals” will radically alter sheep management without any reference to the existing management plans. These proposals become reasonable only if “allocation” is completely separated from “management.” I don’t think the two are “severable.”

The list of 16 proposals breaks down like this:

Two proposals (#106 and #107) are to move away from the experimental “any ram” bag limits in the Chugach and return to full-curl bag limits. One comes from respected guide, Dan Montgomery, and the other by the Anchorage Advisory Committee. These proposals do not address any of the problems suggested for solution by the questionnaire. Crowding and hunter conflicts are not the basis of these proposals. Bag limit is the issue here.

Four proposals (#109, #110, #111, and #112) are to provide presumed advantages for resident hunters through a variety of means. The thread running through these four proposals is that there are too many sheep guides, too much nonresident harvest, too little advantage for residents, too many hunters, and too high a harvest. Thanks to the specter of these proposals altering Alaska Dall sheep hunting “forever,” on the basis of popular ‘impressions’ (or long-standing resident hunter prejudice) Joe Want (with me trailing in his wake) did the most exhaustive analysis of Dall sheep harvest and hunter data ever. What did he/we find?



Hunters “crowd” themselves by their choice to cram themselves into the early part of the season. This is simply tradition.

There are no more sheep guided hunts than ever. In fact, this last year was a record low. There are fewer resident hunters than ever, and the downward trend over the last 20 years continues.

Harvest success is as high as ever.

Average horn size is greater than ever, and slightly increasing.

The percentage of rams >40 inches in the harvest has been highly variable over the last 25 years, and it is difficult to identify a recent trend given the variability. It doesn't look like we're short of huge rams due to hunting pressure.

Guided nonresidents do not kill larger rams than residents.

Both resident and nonresident hunters harvest rams with normal age distributions (indicating the legendary selection for the largest ram is mythical).

It is highly likely that overall harvests of Dall rams are much below the sustainable level, averaging about 50% of what is known with certainty to have been available for harvest.

None of these statistics indicates an overall problem. Nevertheless, the impression of a problem has been generated. My hypothesis is that this impression has been generated through artful manipulation of the Board proposal process.

I counted 14 proposals alleging the sorts of problems (primarily attributed to guided nonresident hunters) which are not supportable by data. Six of these were submitted by two individuals, both with Fairbanks Advisory Committee connections. One of these individuals has a documented grudge against guides (in general) over the loss of 80 gallons of avgas he assumes were stolen by a guide from a remote SuperCub strip in the Northern Wrangell Mountains. These folks seem passionately committed to populist management restrictions on the hunting options of others based on their emotionally-driven impressions which cannot be substantiated by data. Since there are no data (beyond verbal anecdotes) supporting the allegations of crisis, I tend to classify the allegations of crisis driven by these opinions, as incident-driven self-interest represented as “general-interest.” They have successfully built a case on impressions which are directly contradicted by the harvest/use data.

[Personal admission: I don't think it surprising that I remain “data-driven.” The data “drug me into” full-curl biology, and my life has never been the same. When data on compromised ewe reproduction data (which ultimately lead to full-curl regulation) indicated a problem I followed the data to try fixing it. The “dog I have in this fight” is the same one. I remain committed to management by data at hand rather than the impressions of the self-aggravated. I may be nuts, but at least in this part of my life, I am consistent. When there is no data-definable problem, I'm reluctant to embrace a fix, particularly when the “need to fix” is driven by specious allegations which are clearly mistaken. WEH]

But, as they say in TV infomercials, “Wait! There's more!”

Of the remaining eight proposals, two were from the Bowhunters asking for special-interest consideration for themselves (same proposal two different regions). These proposals

“piggybacked” on the allegations of “crowding” and excessive nonresident participation. These allegations don’t match the data either.

This leaves six proposals. Of these, I know at least three were submitted by other persons with Advisory Committee connections (in Fairbanks and Healy). They are based on the same, counter to the data, allegations of “nonresidents being the problem.”

The other three proposals are from folks I don’t know. One allegedly “knows of” a bad actor guide. Certainly, “bad actors,” need rehabilitation; but that seems an insufficient justification for radically altering sheep harvest opportunities for everyone.

That leaves one proposal, the one from the Middle Nenana Advisory Committee. This one suggests that the management objective of record for GMU 20A (approved by the Board of Game) be altered without even acknowledging it exists. Going way back to 1976, the Board approved three basic management objectives for Dall sheep. One was “maximum opportunity to hunt.” This has been the objective in GMU 20A ever since. It has never been changed. I suggest this objective is consistent with constitutional and statutory mandates as well as the access, traditional use, and sheep biology of GMU 20A. For me, this raises the specific question, “Is it OK to change a management objective via regulation without first amending the objective to require or permit the regulation?”

This takes me to my “second hangup.” It is “policy.”

My “dog” here is a dogged adherence to the traditional understanding of the Alaska Constitution, Article VIII Section 1, Statement of Policy: **“It is the policy of the State to encourage . . . the development of its resources by making them available for maximum use consistent with the public interest.”**

I think making resources (in this case Dall sheep) available for maximum use is reasonably clear. Just what the “public interest” is seems a little more open to interpretation. Alaska Constitution Article VIII Section 2, narrows the scope a little when it says: **“The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the state, . . . for the maximum benefit of its people.”**

Then there’s our Constitution’s famous **“Common Use”** clause in Section 3, followed by the **“Sustained Yield”** mandate in Section 4. Section 4 says: **“. . .”wildlife . . . shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.**

While there have been some interesting identifications of “preferences among beneficial uses” (the limited entry amendment sold by the commercial fishing interests to protect their life style—i voted for it in, what? 1969?—and the state’s subsistence law), I think the intent of the Alaska Constitution is pretty clear. We want to maximize use within the constraints of conservation. That was the major “political reason,” that went along with the biology we knew then that made full curl regulation seem workable. If we can find a better way to meet the

maximum sustainable use mandates for Dall sheep (than full curl), I'll be for it. Just how to do that better hasn't come to me yet.

We apparently differ on whether "full-curl" was the best way to do what the constitution directs, but I gather we AGREE on the constitutional policy. The most we can offer within biological constraints is the direction we should go.

If we agree on the ""maximum use consistent with the public interest" the opportunity to disagree has something to do with the phrase "consistent with the public interest." I'm not sure I know what, "consistent with the public interest" means.

However, I suggest it must have something to do with the "step down" direction given in Alaska Statutes Title 16 where the "Functions of the Commissioner" are enumerated. First (Section 16.05.020. Functions of the Commissioner) the Commissioner is responsible for the Department of Fish and Game fulfilling the constitutional mandates. The commissioner's second duty is the ever-popular, "**manage, protect, maintain, improve, and extend the . . .game . . .resources of the state in the interest of the economy and general well-being of the state.**" Again, the "benefit of the economy" is pretty clear. . .make as much money as we can from Dall sheep. Practically, this means maintaining the lucrative opportunity for nonresidents to hunt to the maximum extent possible. The difficult part is understanding what the "general well-being of the state" is. It is almost as vague as "consistent with the public interest."

With that background as my "dog in the agonistic interaction," I direct my attention to whether the 16 proposals listed on the "Additional Information on Sheep Hunting Proposals" address the general maximum benefit and general well-being of the state. I seriously question whether these proposals should accurately be considered representative of the general feeling that something has to be done about "crowding, and too many guides." I realize this is the "default" position driven by those forming public opinion on the matter and seemingly affirmed by the questionnaire, but I'd like you to consider my perspective.

As I look at the individual proposals, which have accumulated over the last three Board cycles (isn't that six years?), I note the first two proposals (#106 by respected guide Dan Montgomery and # 107 by the Anchorage Adv. Committee) intend to do away with the "any ram" season in the Chugach. They do not address crowding at all. They seem aimed at either biological management of Dall sheep or uniform bag limits. A historical look at the Chugach Permit System will indicate it was based on presumed "genetic conservation," and a notable underestimation of legal ram presence determined via aerial survey. Neither of these two justifications have held up well over time. "Genetic conservation" was spurious from the outset.

The third proposal (#108, again from Dan Montgomery) has to do with guide/client contracts. Nothing about crowding there (except, by inference, that other guides may be bothering Dan).

The next several proposals begin to address alleged excess guiding, crowding, etc. Here's how they looked to me:



Proposal #109 by Tom Lamal

Proposal #110 by Jake Sprankle

Proposal #111 by Backcountry Hunters and Anglers

Proposal #112 by Vern Fiehler

These four proposals include two by Tom Lamal and Jake Sprankle (who seem to be leaders in the “crowding movement” with Advisory Committee experience, and who, together, have authored a total of five of the 16 proposals listed), a proposal by the Backcountry Hunters and Anglers, and another proposal by an advisory committee-associated person from the Healy area. I wonder if these should be considered as representative of the broad public interest.

From looking over the websites of the Backcountry Hunters and Anglers, and knowing their positions in Alaska on many proactive management actions, I am uncertain this group’s agenda represent the mainstream of general well-being to the state. The Backcountry folks do not look like traditional, “maximal use” is their top priority.

Additionally, the Advisory Committee linkage of the other authors of these proposals raises, for me, the question of why, (if these views on crowding, too many guides, too many nonresidents etc, represent the people or the “general well-being” of their communities), these proposals came from individual and not through the Advisory Committee system.

The next **proposal, #113**, seeks a special advantage (a special early season for them only) for bowhunters. It alleges “overcrowding” but seems to have cited that more as a concept or supplemental argument than a major concern. Bowhunting Dall sheep works best when only the individual bowhunter is in the field. Creating a special season for relatively small Dall sheep bowhunting community does not seem a “benefit of the general well-being” proposal to me. If bowhunters want to be alone, they currently have the option of hunting late in the season.

The next **proposal, #123**, from the Middle Nenana Advisory Committee, proposes to restrict hunting opportunity in GMU 20. While this may represent the views of the local advisory committee, the committee fails to recognize that they are seeking to set aside a Board Approved Management Plan Objective of long standing without addressing this presently-existing management plan. The objective for GMU 20 has been “maximum opportunity to hunt” since the Board approved the Sheep Management Plans in 1976. It seems to me that if the broader public interest in GMU 20 were to be considered, the appropriate methodology would be to first amend the management plan to allow what the Middle Nenana Adv. Comm. prefers. Shouldn’t the management objective be deliberated and changed before we alter the regulations? The Alaska Range East of Mt. McKinley is one of the “hot spots” for guided activities (Joe Want’s analysis), but that is consistent with the existing use objective.

Proposal #115, by Dave Machachek (another Advisory Committee member submitting a personal proposal) seeks to create a special youth hunt in late July to preserve hunting traditions which he holds can’t be maintained under existing seasons and bag limits.



Proposal #116, by Keenan Zerkel alleges that residents don't have adequate opportunity in the "Central/Southwest Region, because of pressure from guides and nonresident hunters. Keenan asserts the chances for a successful hunt for a resident are "slim to none." I encourage the Board to check resident harvest success to see if Keenan's "slim to none" is accurate.

Proposal #117, by Paul Ferucci is also for the Central/Southwest Region. With all respect due to Paul, His statistics don't seem to match those with which I am familiar. He seems to think guided hunters take too high a percentage of the sheep in the "Central/Southwest"—is that the Alaska Range West? Joe Want identified a guided "hot spot" in the Alaska Range West. Additionally, Paul would prefer that the percent of harvest rams look more like other western states where sheep resources are incomparably smaller than here in Alaska.

Proposals #118 and #119 are from the team of Lamal and Sprankle. They propose essentially the same things as proposed in other Regions and in other years. I have to hand it to Tom and Jake for creating the impression that their view of the world is broader than themselves by continuing to keep the pressure on the Board as individuals. I'm also grateful that they have "kept pounding away," because it stimulated Joe Want (with me tagging along) to take serious looks at the overall sheep harvesting picture. The impressions conveyed by Tom and Jake are not consistent with what Joe has found in the harvest data, and I have checked against my recollections. The statistics do not agree with the allegations of limited opportunity, smaller sheep, increasing sheep guides, or increasing resident pressure. Thanks to Jake and Tom stimulating Joe, we now know a great deal than we did when they embarked on this crusade, which they have turned into a public perception.

Proposal # 120 is another special-interest season for bowhunters. It's essentially the same proposal as # 113, only for a different region at a different Board meeting.

Proposal #121 is Jake Sprankle keeping the pressure on with the same proposal for a different Region at a different Board meeting from #110.

Proposal #122 is another one from Tom Lamal. This time, he proposes an earlier opening for residents because they don't get a fair shake in the existing 42-day season. This seems to be a matter of "aesthetics." The other allegations of shortage, and success etc. don't match the statistics of record.

Proposal #123 is by Leonard Jewkes, another Advisory Committee member submitting a personal proposal. He's in agreement with Tom Lamal, with whom he served on the Fairbanks Advisory Committee, that an earlier season is needed to give residents a fair shake. I have to wonder if these proposals represent public or special interests. Few of the statistics they cite as justification stand up in the light of reported harvest data and trends.

Proposal #124 is from Chris Gossen. Chris wants an earlier, "residents only" season because he "knows of" one guide that tried to scare off a resident hunter in GMU 25. Certainly, there are unsavory users (both guides and residents) who don't want to compete with others. However, one has to consider the possibility that this is not a wide-spread enough problem to require a regulatory change.

On Fri, Dec 12, 2014 at 4:38 PM, Wayne Heimer

Friends,

Things have been crazy for me with the Governor's subsistence transition team and upcoming critical time with accumulated sheep proposals scheduled before the Board of Game on the future of sheep harvest management. The special-interest nature of these proposals has got me to thinking beyond the "alligators" to the "swamp drainage" issue. Let me share a bit of my thinking:

The Dall sheep allocation/management proposals scheduled to come before the Board of Game in Feb. are critical to the future of sheep hunting in Alaska. Hence, they are a priority for me. I've commented *ad nauseum* on all of them as they have accumulated over the years, and along with Joe Want, have been involved in a detailed analysis of the harvest data and trends since antiquity. However, that is "**alligator level**" thinking and I'd like to look first at "**draining the swamp**" today.

"Draining the swamp."

In your experiences over time, have you ever observed that the structure of the Boards of Fish and Game and the way they work (mandatory consideration of individual proposals and the local Advisory Committee system, etc.) are designed to accommodate (either by granting or "considering"—sometimes beyond what is merited) the proposed requests of special interests? All proposals are supposedly given equal weight and consideration, but tacitly ask "special-interest" questions regarding "justification." The proposal form does not ask how this proposal comports with policy set by the Alaska Constitution or Alaska Statutes, but rather "*Who will benefit?*" and "*Who will be harmed?*" This special-interest focus suggests the only force standing between special-interest and rational overall management/allocation is the integrity of the individual members of the Boards of Fish and Game. For the most part, this has worked well over the years, but places an undue social burden on the Boards.

This is because the normal "check and balance" system of our representative democracy has traditionally been inoperative with respect to the Alaska Boards of Fish and Game. As a matter of origin and function, the Board of Game (my particular interest with the proposed "advantages" to resident sheep-regulation proposers) is a Legislative Branch function. The Department of Fish and Game (through the Commissioner) is an Executive Branch function.

If the constitutional/statutory “check/balance” system were functioning, the Executive Branch (through the Commissioner) would represent the “broader constitutional/statutory picture” while the Board of Game represented the “narrower” (parochial or special-interest) view. The resulting resolution of these two perspectives should provide a stable and balanced regulatory system. However, there are complications.

The fact that the Commissioner must be recommended (for appointment) to the Governor by the Joint Boards of Fish and Game, and then confirmed by the Legislature tends to “disable” the effectiveness of the Commissioner as a “check” on “balancing” Board autonomy. Additionally, the tradition that the “Department (technically the Commissioner’s office) “manages” and the Boards “allocate” also tends to separate “management” from “allocation” which limits the check/balance function as a constraint on special-interest allocation/management. When we have Board of Game (or Fisheries) members with backgrounds in the Executive Branch (i.e. the Department of Fish and Game), we have a further blurring of the “Executive/Legislative and management/allocation” functions. Finally, when the Board generates its own proposals and the Department/Commissioner/Executive Branch declines to participate in “allocation,” we tend toward an unbalanced system. Under these circumstances, special-interest benefit becomes a more serious threat. I think this is where we are with the sheep allocation/management proposals which have accumulated over time due to Board of Game reluctance to say “no” to persistent resident sheep hunting special-interest.

Lacking a Commissioner willing to tell the Board of Game, *“I can’t perform my mandated management duties if you accommodate this or that special interest, so don’t do it!”* the Board of Game has a long history of finding it difficult to say “no” to special-interests. This seems to have given us the present sheep proposal situation. I suggest this has been because the biological and management facts have been obscured by intuitive perceptions of Dall sheep harvest opportunities plus the fact that the special-interest here is primarily resident special interest with a populist flavor.

With the Commissioner’s office providing no guidance with respect to Article VIII of the Alaska Constitution and Alaska Statutes Title 16, the remaining “check/balance” is the citizenry which must somehow organize and deliver a sufficient quantity and quality of testimony to counteract that presented by the special interests which have the advantage. It is clear that the present situation favors the resident-sheep hunter position. I perceive (accurately or not) the attitude that “we’ve got to do something” because this problem is so severe. I question the severity of the problem; it has been highlighted and driven by a small vocal segment with a special-interest.

Now, for some “alligator-level digression:

Based on my experience and familiarity with Dall sheep management over the last 40+ years, I see no data-definable problem, but rather a cultivated perception that crowding is a problem that can only be solved by restricting participation. Plenty of personal anecdotes seem to buttress the perception that the ancestral competition/resentment between resident and nonresident hunters needs addressing. Still, the data simply aren't there. Hence, I argue special-interest in the absence of a functional “check/balance” is about to “run away with the system;” and compromise the longer term future of Dall sheep conservation in Alaska.

Here are the facts of the situation:

There are fewer Dall sheep than at some times in the past, but we're not at historically low levels.

Nevertheless, we're taking only half of the rams **known to be available** for harvest (from the “Want method” age structure analysis: See Heimer, W. E. 2012. *Calculating Harvest rates for Alaskan Dall rams using reported harvest age structure: implications for Dall sheep management in Alaska*. Bienn. Proc. North. Wild Sheep and Goat Council. 18. pp 15-24). This fifty percent harvest level has been the pattern for the last 20 years.

There are fewer hunters than ever before. Hunter participation is about half of what it was 20 years ago.

Overall hunter success remains as high as it has ever been. Present hunter success is higher than at some times during “the good old days” circa the late 1960s.

Average horn size is stable at historically high lengths.

Nonresidents do not take older/larger sheep than residents, though their success rate (probably due to required guide) is about twice as great.

The percentage of unusually large rams (>40 inches in length) in the harvest has been highly variable over the last 24 years (average of 0.04% with range from high of 0.075% in 1995 to the 0.027% in 2008). This percentage appears to be somewhat cyclic over the last 24 years. The last three years have indicated a downward trend, with 2011 being unusually high at 0.061%, 2012 being slightly above average at 0.48% and 2013 being 0.35% (slightly below the overall mean). There is no way to credibly argue (from these data) that we're presently in worse shape regarding unusually large sheep.

Hunter numbers are declining , and have been doing so for the last 20 years. This is the greatest concern I can identify. The "North American Model" requires a sense of "use-based ownership" to foster effective participation in conservation.

Half of the entire season's effort and harvest are crammed into the first 10 days of a 42-day season. This may account for the perception that we have too many hunters (and guides) when the remaining 32 days of the season are sparsely used.

Additionally, oil prices are tanking...which makes management for the "benefit of the economy," AS 16.05.020(2), a high priority. Maximizing benefit to Alaska's economy (and the ADF&G budget) requires maximizing license sales to both residents and nonresidents. It appears likely that "general fund money" should not be counted on to supplement the Fish and Game Fund for federal match in the next few years.

There is no biological crisis, and the perceived "social crisis" can be solved via individual choice to hunt later in the season. The entire "crowding perception" results from the overall choice individual hunters make when they cram themselves into the first quarter of the season. Hunters may need more information on how to achieve the hunting experience they desire, but regulatory restrictions on opportunity at this time would be a mistaken approach considering the present situation and longer-term future.

Weather has not been favorable lately; but there is credible evidence that the "Pacific decadal oscillation" (a 10-year warming/cooling event in the Pacific that affects Alaska weather) is real and affects wildlife. Nobody actually know how badly the weather has affected sheep in any specific locality, let alone statewide. If we had total lamb production failures this year (and last) in the Brooks Range, this means we'll be in a "crunch" for legal rams in 8-9 year in the Brooks Range (at least those portions where lamb production was a total failure). This has happened before, and will happen in the future.

Experience shows aerial surveys typically overestimate negative population effects. Hunters on the ground always seem to find more rams than biologists sitting in airplanes.

Reference to past sheep management history (and the associated data) will show that we've weathered everything today's special-interests are highlighting as requiring critical regulation change. Yet, the sheep and hunters have survived in a relatively constant relationship. I perceive a certain "manufactured crisis mentality" associated with this issue. I suggest we take care to look beyond the well-orchestrated special-interest perspective as we consider the longer term conservation of Dall sheep in Alaska, and the benefits of rational (not emotional) management benefits for Dall sheep hunting in Alaska's future.

Now, back to the "swamp-draining" level:

The Commissioner, if interested in fulfilling his/her, statutory duties must take the "benefit of the economy" into account in situations like this one, and should "check or balance" the special-interests of activist residents seeking to alter long-term management outcomes for their immediate special interests. If the Commissioner does not assist the Board of Game in this arena, it becomes incumbent on the Board to manage responsibly according to biological, management, and constitutional/statutory priorities without the Commissioner's help. It should not fall (as it always has) to the "general-interest" portion of Alaskan hunters to perform the Commissioner's check/balance function. But that's the way it is, which occasioned my repetitious citation of the "alligator-level" facts above. The Board is not within the Executive Branch of government, but in the absence of an active Commissioner, it falls to the Board to do his/her job if constitutional and statutory mandates are to be followed.

The other Commissioner's (AS 16.05.020(2)) duty is to manage for the "general well-being" of the state.

When resident special-interests attempting to exclude other hunters (the dominating special-interest of the moment) demonstrate a benefit to "general well-being" that swamps the economic criterion as we look at a light, stable harvest of mature rams while the state faces an economic decline, I'll be more willing to consider "solving" the perceived (but not demonstrable—other than via a questionnaire documenting popular (and I think cultured) distress of resident hunters seeking their own special interests) problem. For now, it makes neither "alligator-level" nor "swamp-level" sense to me.

Wayne E. Heimer
Sheep Biologist ADF&G 1971-1997
1098 Chena Pump Road
Fairbanks, Alaska 99709



Submitted By
jane grant
Submitted On
12/23/2014 7:20:04 AM
Affiliation

Phone
1224513089

Email
janeg4223@gmail.com

Address
4 old church road
torry
aberdeen, Other ab118ds

i just want to say that hunting and killing these amazing animals is so wrong they are part of our planet enough destruction is going on in the world as it is , these precious animals should be allowed to live freely and not be killed to be someones trophy . LEAVE THEM BE LET THEM LIVE IN PEACE AS WE PROTECT OUR FAMILIES THEY PROTECT THEIRS ITS NATURE AND NATURE IS WONDERFUL . watch them from a distance and get to understand them . no more hunting or killing . OUR WORLD IS FALLING APART WITH ALL THE WEAPONS OF DESTRUCTION AND GLOBAL WARMING WE ARE NOT GOING TO HAVE A PLANET ALL SOON ENOUGH SO ENJOY WHAT WE HAVE NOW . CHOOSE LIFE , CHOOSE TO LET LIVE .



Submitted By
Kathleen Cheatham
Submitted On
12/23/2014 6:00:53 AM
Affiliation

Phone
602-237-4619

Email
kmb1234@aol.com

Address
11202 s 51 ave
laveen, Arizona 85339

Please save the habitat and the wolves, stop this senseless destruction and killing.



Submitted By
Mary Ann Sturdevant
Submitted On
12/23/2014 12:21:25 PM
Affiliation

Phone
317 565 9738

Email
tillery1224@gmail.com

Address
8454 East State Road 47
Sheridan, Indiana 46069

PLEASE ... SAVE OUR WOLVES ... ALL OF THEM



January 23, 2015

Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Alaska Board of Game:

I am writing to strongly urge your support of Proposal 105, scheduled for consideration at the Central/Southwest Region meeting on February 13. I am the author of Proposal 105 and I have had discussions with ADFG staff, numerous refuge users (mostly hunters and fishers), and the Anchorage and Mat-Su Fish and Game Advisory Committees. I would like to clarify my intentions in submitting this proposal and address a couple of concerns that have been raised.

I am aware that only the Alaska Legislature can modify the boundary of Palmer Hay Flats State Game Refuge in AS 16.20.032 to include the parcels that I have described. My goal in asking the Board of Game to act under AS 16.05.255(a)(1) is simply to have the Board endorse these lands for inclusion in the refuge through letters to Southcentral Alaska Legislators, the Governor and the Commissioner of ADFG.

During discussions of Proposal 105, some individuals have been unduly concerned that including these parcels in the refuge would increase restrictions on public access—primarily motorized access. First, these parcels were originally private land that we not open to the public; now they are owned by the state and open to public access. Second, the public and private collaborators that purchased these parcels for fish and wildlife and related public uses attached conservation covenants on the titles to ensure that the lands would be managed consistent with the purposes of the state refuge. Thus, these additions would have no more and no fewer restrictions than any other part of the refuge, as guided by the refuge management plan and regulations.

Given that the state owns these parcels and they are bound to be managed consistent with refuge policies, some view statutory changes to the refuge boundary as a minor housekeeping issue that is not important. We refuge users and others, however, believe that officially consolidating these lands into the refuge: (1) fulfills the promises made to conservation partners that acquired these parcels for public benefit; (2) designates ADFG as the primary manager of the entire refuge vs. the current ADNR responsibilities on these parcels; (3) facilitates ADFG investment in improvements to fish and wildlife habitat and public access; and (4) clarifies land status and applicable regulations for enforcement purposes.

Finally, my original proposal specifically named five parcels that were purchased explicitly for the refuge and “other similarly situated parcels” that I may not have been aware of. Since I submitted the proposal, I have learned that ADNR has acquired two parcels adjacent to the



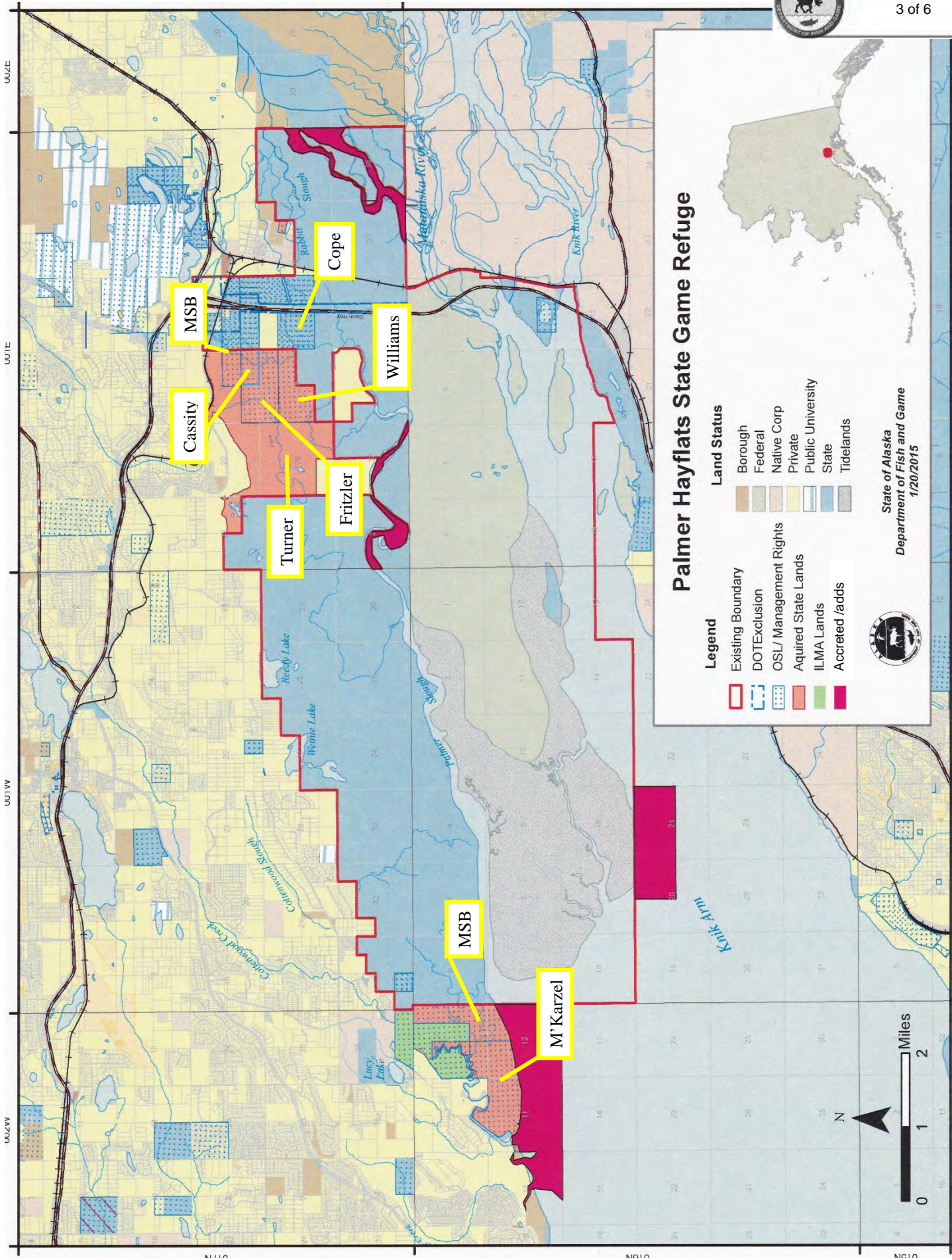
refuge in trades with Mat-Su Borough. Also, the Turner property was acquired for the refuge and transferred to ADNR with conservation covenants similar to the other parcels. These eight parcels (map attached) were clearly acquired for the refuge and should be included in a Board endorsement.

I appreciate the Board's consideration of this proposal to demonstrate support for the acquisition and conservation of fish and wildlife habitats in our state game refuges. Your active support will enhance the public's access to well-managed hunting, fishing and outdoor recreation experiences.

Sincerely,

A handwritten signature in black ink that reads "Thomas C. Rothe".

Thomas C. Rothe
11828 Broadwater Drive
Eagle River, AK, 99577
(907) 694-9068
Tom.halcyon@gmail.com



Palmer Hayflats State Game Refuge

- Legend**
- Existing Boundary
 - DOTE Exclusion
 - OSL/Management Rights
 - Acquired State Lands
 - ILMA Lands
 - Accreted /adds
- Land Status**
- Borough
 - Federal
 - Native Corp
 - Private
 - Public University
 - State
 - Tidelands



State of Alaska
Department of Fish and Game
1/20/2015





January 23, 2015

Alaska Board of Game
ADFG Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Alaska Board of Game:

I am writing to urge the Board to vote NO on Proposal 131, scheduled for consideration at the Central/Southwest Region meeting on February 13.

This proposal would reduce the bag limit for goldeneyes (Common and Barrow's) to 3 daily in the Central/Southwest Region. Goldeneyes are included in the general duck bag limit which is currently 8 daily in Units 14, 16 and 9; and 10 daily in the remainder of the region. This proposal would reduce potential limits for goldeneyes by 63% in coastal units and by 87% in other GMUs.

First and foremost, this proposal is not warranted based on conservation needs at any geographic level. It is not supported by data from current population surveys. Though much of the goldeneye breeding range across interior and northern Alaska and northwest Canada is not covered by breeding waterfowl surveys and goldeneyes are difficult to detect in forested and taiga habitats, standard spring aerial surveys conducted since 1955 indicate a substantial increase in goldeneyes across Alaska and western North America since the 1980s. Most common goldeneyes leave Alaska by late October and various coastal surveys indicate that only 5-15% of goldeneyes wintering in Alaska are common goldeneyes. In contrast, Barrow's goldeneyes winter in southern Alaska, mostly in coastal areas of Southcentral and Southeast Alaska. Winter surveys and recent telemetry studies indicate that there may be at least 165,000 Barrow's goldeneyes wintering in Alaska, and that there is little mixing with Barrow's goldeneyes that winter in British Columbia and further south.

This proposal also is not supported by data that show a significant harvest of goldeneyes in Alaska. Both common and Barrow's goldeneyes are widely distributed across Alaska and are harvested sparsely in many areas from September through late October. Goldeneyes are relatively uncommon after that in the Central/Southwest Region. Unlike common goldeneyes, wintering Barrow's goldeneyes are abundant in coastal areas after October and are mostly taken as part of late season harvests of mallards and sea ducks. Though Barrow's goldeneyes constitute an important part of late duck harvests along the Gulf Coast, Southeast and Kodiak, the harvest is small relative to the number of wintering birds. Since 1999 when the national harvest survey was improved, Alaska duck harvest has averaged 71,770 birds, including averages of less than 1,300 Common Goldeneyes (1.8% of Alaska duck harvest) and about 1,900 Barrow's goldeneyes (2.6% of Alaska duck harvest).

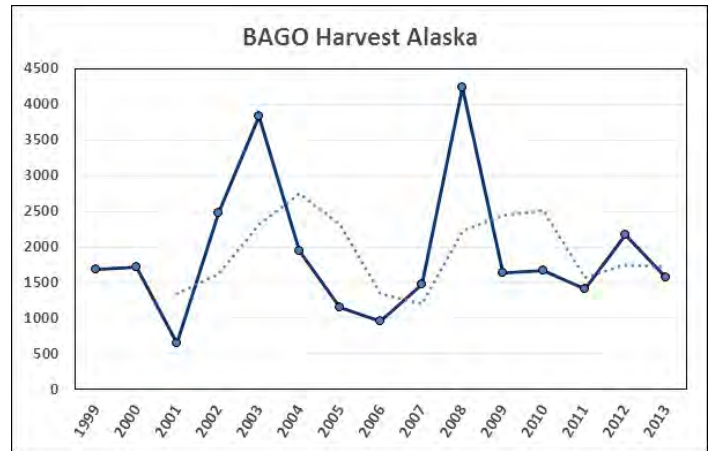
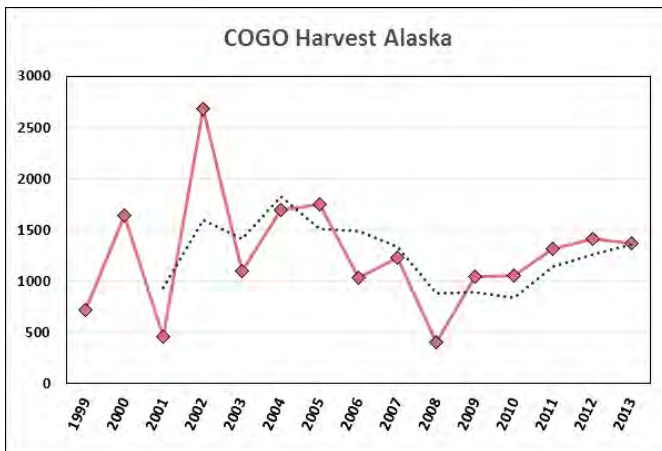
A reduction in goldeneye bag limits, as recommended in Proposal 131, would add unnecessary complexity to regulations for hunters and enforcement officers during September and October and it would substantially reduce harvest opportunities for late season hunters in coastal communities—all without a basis in management data or benefit for species conservation.

I appreciate the Board’s consideration of my comments.

Sincerely,



Thomas C. Rothe
11828 Broadwater Drive
Eagle River, AK, 99577
(907) 694-9068
Tom.halcyon@gmail.com



Estimates of goldeneye harvest in Alaska 1999-2013 from the Harvest Information Program.



January 23, 2015

Alaska Board of Game
ADFG Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Alaska Board of Game:

I am writing to urge the Board to vote NO on Proposal 132, scheduled for consideration at the Central/Southwest Region meeting on February 13 (also submitted as Proposal 34 for Southeast Region and Proposal 192 for Southcentral Region).

This proposal would require all migratory bird hunters in Alaska (8,000-10,000) to obtain a harvest ticket, record detailed information on every bird they shot, and report all data to ADFG by a deadline, under threat of losing eligibility for future hunting.

There is no need for a harvest ticket system to collect such detailed data on harvest of waterfowl, snipe and sandhill cranes for management purposes. Currently, the U.S. Fish and Wildlife Service and ADFG collaborate to estimate migratory bird harvest in Alaska through the national Harvest Information Program (HIP). This survey adequately samples hunters, estimates harvest, and estimates composition of the harvest by species, sex, and age—and does it at a reasonable and appropriate scale to manage bird populations and harvest regulations.

As demonstrated by previous proposals, the submitter advocates for micromanaging duck harvest by specific areas and herein would require a detailed harvest database to support that approach. Whereas, federal and state management agencies have always managed bird populations on the basis of broad flyways or cohesive population units that can be reliably monitored and regulated through sound harvest models. Micromanagement is not technically feasible, would not match our understanding of waterfowl population structuring, and cannot be practically applied to local hunting regulations.

Finally, this proposal would impose burdensome licensing and recording requirements on all hunters, it would require substantially more staff time and funding for ADFG to process tickets and harvest data, and it would create a large database of individual harvest information that should not be inappropriately open to the public—all for no good reason.

I appreciate the Board's consideration of my comments.

Sincerely,

A handwritten signature in black ink that reads "Thomas C. Rothe".

Thomas C. Rothe
11828 Broadwater Drive
Eagle River, AK, 99577
(907) 694-9068
Tom.halcyon@gmail.com



Submitted By
Mark Hamm
Submitted On
1/29/2015 11:33:26 PM
Affiliation
Alaska Resident

Phone
907-444-4515
Email
mwhamm@gmail.com
Address
15850 Rasmusson St
Eagle River, Alaska 99577

January 29, 2015

ATTN: Board of Game Comments

Alaska Department of Fish and Game

Board Support Section

P.O. Box 115526

Juneau, AK 99811-5526

RE: Management Decisions Relating to Dall Sheep Hunting

Dear Members of the Board of Game:

There has been much discussion about what to do with the management of Alaska's Dall Sheep. As a lifelong Alaskan resident and avid hunter I have paid close attention to the board's tracking of this issue. There are a multitude of proposals that have been submitted to the Board of Game, and my aim here is not to support a specific one, but to give you my thoughts on how I would ask you proceed as you review the many proposals.

I have hunted sheep 5 times over the last 6 years and between my hunting partner and myself, we have had the fortune of harvesting 7 rams with over the counter tags. Pretty good odds and success. During the past six years I have hunted the Wrangles, the Alaska Range, the Brooks Range, and the Kenai Range.

One of the things I love about Alaska is the opportunity for Alaskan Residents to hunt sheep every year with an over the counter harvest ticket. I do not support proposals that give more weight to non-resident hunter allocation (directly or indirectly) at the expense of resident hunters. It is nice to have trophy areas and a few limited draw areas, but more important is the opportunity for resident hunters to have annual tags for sheep.

The proposals that have been put forth by the Chairman and others to limit sheep hunting to a 1 in 4 years opportunity or by a state wide draw will only really impact resident hunters. Most non-resident hunters will not be impacted by a 1 in 4 rule or a draw that effectively does the same thing. I do not support any proposal that limits resident hunters from the opportunity to hunt annually.

Other proposals by the Chairman and others have suggested that to ease crowding, that hunters should be grouped by last name or some other category and assigned a revolving 2 week period to hunt. I do not support this. I have found that a simple way to avoid crowding is for sheep hunters to choose to hunt during the last 4 weeks of the season. Usually we have the place to ourselves and our success rate seems to indicate that we have done pretty well even though we missed the opener. Those who feel there is overcrowding may need to adjust their own timing instead of being directed to do so by some sort of category or allocation.

Clearly there are areas where guides are heavily using the resources and displacing resident hunters. An example of this are units 20A and 19C. Due to the high presence of guides, I have chosen to hunt other areas. I believe many residents have made similar choices with these areas and have been displaced to other areas like the Brooks Range. Making non-resident hunters draw for tags would limit the overall harvest and help to alleviate some of the pressure in these areas without having to deal with the legal challenges of implementing a concession program on State lands.

If the board feels that it must take action to place limits on the harvest of Dall Sheep, I ask that you follow the general principles below:



- Do not limit Alaska resident opportunity to hunt sheep annually.
- Do not create a rotating schedule for hunt periods as a way to ease hunting pressure throughout the season.
- Do not implement a state wide draw for residents.
- If a limiting of hunters must take place, consider first making small limits on non-residents and then assessing if any improvement has taken place.
- Consider applying the federal framework for regulating guides to the guides conducting sheep hunts on state lands.
- Maintain current fullcurl requirement for sport hunting of Dall Sheep statewide.
- Consider increasing fees for residents and nonresidents for Dall Sheep harvest tags to offset any lost revenues and to increase research towards a comprehensive management plan for Dall Sheep.

As a father of young boys, I look forward to the time I can introduce my sons to sheep hunting without having to wait for a draw tag. Drawing permits make hunting more cumbersome and more inaccessible to young Alaskan hunters.

Please keep in mind the importance of maintaining the opportunity for resident hunters as you make your decisions. Also please consider that other western states have generally resolved the issue of limited wild sheep availability by limiting non-residents to a lesser amount of the harvest and by increasing tag fees. Thank you for the opportunity to comment and best wishes for your meetings and decisions on this important issue.

Sincerely,

Mark Hamm



ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Comments for the Alaska Board of Game for 2014/2015 Proposed Changes to Regulations.

Proposal 95 – Opposed

On behalf of the South Central Alaska Chapter of The Ruffed Grouse Society and myself, we are oppose proposal 95, expansion of the hunting season for ptarmigan in GMU 13B. We recognize the economic impacts of the proposal to the businesses in the Paxson area; however, wildlife management should not be based on economic considerations.

The November 30th closure for ptarmigan hunting in this area was implemented in 2009, as part of a 3 part research project to determine the impact of winter hunting on roadside bird populations. The three comparison areas are Denali National Park where no hunting is allowed; this portion of GMU 13B where the season is limited; and the west end of the Denali Highway, GMU 13E, where extended winter hunting is allowed. Since ADF&G did not have a small game position, only minimal information was obtained between 2009 and 2011. In 2011, a small game positon was established and data gathering has finally begun in earnest.

To maintain a study area where winter hunting is limited, the full boundary and season modifications are required. A closure of 2.5 miles either side of the Denali Highway in GMU 13B, as this proposal suggests, is not adequate protection for birds with a movement pattern as extensive as the ptarmigan. Ptarmigan populations are reported to travel over 100 miles from summer range to wintering grounds.¹ Early collaring results have shown a Unit 13 bird traveling over 50 miles before returning to the vicinity where it was collared.²

The GMU 13 ptarmigan research program was established to gain population data on the birds and potentially identify the cause(s) keeping the ptarmigan population depressed throughout much of South Central Alaska. Modifying or eliminating a portion of the study area, at this time, will destroy the overall integrity of the study. It would be disastrous to curtail this program when it is finally getting off the ground. The data this project will generate is critical to management of a bird population that continues to be depressed. Let's find out if winter hunting really is part of the problem.

We urge the Board to continue this critical study uninterrupted by rejecting proposal 95.

Submitted by,

Nick Steen
3201 N Greentree St
Wasilla, AK 99654

Michael Fuller
President, South Central Alaska Chapter
The Ruffed Grouse Society

¹ Irving, L. et al, "Migration of Willow Ptarmigan in Arctic Alaska", Publication No.42, Laboratory of Zoophysiology, Institute of Arctic Biology, University of Alaska, 1967 Arctic Vol. 201, pages 77-85

² Personal conversation with Richard Merizon, ADF&G Small Game Biologist, Palmer, Alaska.



ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Comments for the Alaska Board of Game for 2014/2015 Proposed Changes to Regulations.

Proposal 180, 181, and 194 – Opposed

Public land should be open for the use of all citizens regardless of their activity preference as long as it is legal. Enhancing one activity by excluding another should not be allowed. It should be up to the user to protect their interests in areas open to other legal activities. If that means keeping dogs on leashes in known trapping areas, then it is up to the user to do so. Proposals which pit public land users against each other should not be considered and/or supported by the Board of Game.

Submitted by:

Nick and Karen Steen
3201 N Greentree St.
Wasilla, Alaska



The Alaskan Bowhunters Association, Inc.

P. O. Box 220047
Anchorage, AK 99522
907-929-3600 Fax 907-334-9691
www.akbowhunters.com
akbowhunters@gci.net

ATTN: Board of Game Comments

Alaska Department of Fish and Game
Board Support Section
PO Box 115526
Juneau, AK 99811-5526
Fax 907-465-6094

The Alaskan Bowhunters Association
Comments for Central/Southwest Region Meeting
Wasilla Feb. 13-20, 2015

Proposal 98 & 125 – Support: This is for a late archery only season for moose in unit 16. The moose population in unit 16 has rebounded nicely in response to predator control programs and favorable weather. Archery hunts for moose in August have not proven to be successful because of dense foliage and very limited natural movement of moose at this time. Also meat care is much more difficult in the warmer weather of August. Starting a hunt five days after the general season has closed would place the hunt after most of the actual breeding had been completed. The size limits would remain the same as in the general hunt. Relatively few moose would actually be taken, but additional hunting opportunity would be provided.

Proposal 113 & 120 – Support: Both of these proposals are for an early archery season for Dall sheep and fall under the general discussion of sheep hunting statewide. Allowing an archery season for sheep starting on August 1st and requiring full curl, double broomed, or eight years old would provide extra opportunity for hunters to be in the field hunting sheep under less



crowded conditions. This would improve the quality of the experience for both the hunters choosing to use archery gear who would not be competing with firearms hunters as well as sheep hunters choosing to use firearms because there would be less crowding in the field. Business wise it would be good for guides, transporters and air taxis by providing an extra hunt for which to provide their services. Because archery hunters make less noise they would not disturb the sheep populations as much as simply providing an extra week of firearms hunting. Biologically it should not be a problem because Dall sheep seasons open in parts of Canada as early as July 15th without affecting the sheep populations. This hunt could easily be implemented this next regulatory year as a registration hunt. That would allow close monitoring of the effectiveness of the hunt in terms of both participation and harvest success. If 20 years of experience with the Unit 14C archery hunts is to be believed there will only be a less than 2% harvest rate for archery hunters seeking mature full curl rams.

We would like to emphasize that with modern archery gear, nearly anyone can learn to hunt with conventional archery equipment. So bowhunters are NOT a special interest group. Providing an archery only hunt is a limitation of methods and means. Archery hunts are NOT hunts provided for a special interest group.

We would also like to point out that according to the Brinkman survey (Table 12 pg 20), more archery only hunts had the highest approval of any of the alternative hunts suggested on the survey when all resident hunters were pooled.

Proposals 127 & 128 – Support: These two proposals would remove the requirement to salvage brown bear meat when taken over a bait station. This just makes good sense. In no other general hunt is it required to salvage brown/grizzly bear meat. This regulation was placed by someone opposed to taking brown/grizzly bear over bait as an impediment to otherwise legal hunting.



Proposal 129 – Support: The permit requirement to remove all contaminated soil from a bear bait station is virtually impossible. It was not put in place by the Board of Game but was inserted in permit requirements, presumably by ADF&G personnel who were personally opposed to baiting bear and who wanted to make it as difficult as possible to comply with the permit conditions. There is no adequate definition of the meaning of “all contaminated soil”. Is it anything with an increased sugar or fat content by lab analysis or is it just visible bait? What if a bear eats the bait and defecates ten feet away is that contaminated soil? How far should the “contaminated soil” be moved; 10 feet, 50 feet, ½ mile? If the contaminated soil is truly contaminated with bait does a hunter require another permit to deposit it somewhere else? Please note that this proposal does not wish to eliminate the requirement that all trash, liter, stands, barrels, other artificial materials and even visible bait be removed from the site. That is all reasonable, appropriate and doable.

Proposal 130 – Support: This would allow the same day airborne taking of wolf and coyote as long as the hunter was at least 300 feet from his airplane and had done nothing with the airplane to haze, herd or harass the animal.

Predator calling is a sport that is increasing in Alaska especially with the development of advanced electronic predator calls such as the FoxPro. A hunter with an airplane may fly out in the morning, land his plane and hike for hours setting up several different calling locations before finally returning to his plane at the end of the day. Regardless of the weapon used bow or firearm it would be nice to be able to shoot any predator that came to the call.

Currently it is legal to hunt fox and lynx on the same day airborne as long as you are over 300 feet from the plane. It would be a rare trophy if a wolf, coyote or even a wolverine came into a predator call. We believe that you should pass this proposal and include wolverine as well.

Proposal 134 – Defer or Table but only until the Anchorage Meeting in March 2015: This is a



proposal to require formal education and certification for hunters using crossbows. This proposal was NOT made by the ABA and there is considerable disagreement within our membership. Many of our members are concerned that the Board of Game will simply add crossbows into the regular archery seasons and the ABA is adamantly opposed to that. However, many of our members believe that weapon specific education is far more important for hunters using crossbows than for hunters using conventional bows. There are numerous different safety issues and many users of crossbows are young, old, physically impaired or brand new to use of crossbows. The potential for abuse and illegal use is greater with crossbows than conventional bows.

We would like to see the Board of Game take up this proposal for all of Region I, II & IV at the Anchorage meeting in March rather than put it off until the Statewide meeting in March 2016. The reason for this request is that the requirement was passed last year that all hunters using conventional archery gear must be IBEP certified by July 2016. We believe that it is logical to implement this crossbow proposal at the same time. However the ADF&G hunter education program will need time to develop and administer the crossbow training course before July 2016. So if the Board of Game passes the requirement for Regions I, II & IV and signifies that they intend to make the regulation statewide next year then there will be adequate time for planning.

We have a 20-minute presentation regarding the uniqueness of crossbows as a hunting device and the reasons why we believe crossbow specific education is important. We would like the opportunity to show that presentation to the Board of Game at some time either at the Wasilla meeting or the Anchorage meeting this year.

Proposal 208 – Comment: The Alaskan Bowhunters Association has both resident and nonresident members so we do not wish to make any comments regarding limiting nonresidents.

We strongly believe that our proposals #113 and 120 provide an easy partial solution to some of the problems expressed by sheep



hunters. It is a solution that would be easy to implement and try on an experimental basis for a couple of years. We have presented this proposal many times before. We believe that the Board has not seriously considered this proposal. Also we are concerned that the Brinkman Survey did not adequately consider the possibility of separating hunters by the effectiveness of their devices.

There are clearly advantages in being the first hunters into the mountains each summer for sheep. We really do not know how many hunters who typically use firearms would pick up archery gear if that were what was required to be the first into the field to hunt sheep. There are numerous examples of firearms hunters learning to use archery gear to allow them to hunt in the 14C special archery sheep seasons. Certainly not everyone would accept the challenge but enough might that it would spread out the initial opening day crowd in some sheep mountains. The hunters starting early would have a very limited chance of killing a mature ram. For many of us success is defined as the opportunity to be in the mountains away from the maddening crowds.

Those hunters who want a higher chance of success would wait to hunt with their firearms until August 10th, the standard opening day.

Allowing this early archery hunt would provide the possibility of additional business for some guides, transporters and air taxis. We believe that there would be no biologic effect on the sheep population by giving this extra opportunity. It would be easy to implement and monitor with a simple registration permit requiring reporting.

Finally we want to emphasize, this is not a request for a hunt for a special interest group. This is a potential solution to the problem defined by the Board of Game of increasing conflict between overcrowding of sheep hunters at the beginning of the season. Any hunter who is in good enough shape to hunt sheep should be able to learn to use a modern set of archery gear.

Thank You for your Consideration of our comments.

Respectfully submitted,

John D Frost

Legislative Vice President of the Alaskan Bowhunters Association.

John D Frost 1-28-2015



Jan 30 15 10:58a Ray Atkins

1-907-768-2651

p.1

Sherry Wright
Fax 907-267-2489

RECEIVED

JAN 30 2015

BOARDS
ANCHORAGE

Sheep hunt & sheep seasons

Reply to proposal #30 – good intentions but bad idea

Id you want to spread hunters out, make the season longer not shorter – Brooks Range hunts started August 1st for years, if that is where most of crowding is. If you want fewer people in the field make the season a 1 sheep every four years like the grizzly bears.

Most Alaska guides get their hunters from sports shows which take place after the first of each year, this would not allow these clients to apply for permits that year. Time is quality, if you shorten time you shorten quality.

Many resident Alaskans are short timers or military people - 3 or 4 years or less and then are gone. Many unsuccessful hunters complain about the successful hunters. The unsuccessful hunters might try a little harder.

As a guide we harvested 2 sheep from Unit 13E in 2014 and 2 sheep in Unit 20A - my normal take per years is 6 from these units.

At early June 2014 I observed 20 ewes at a normal nursery area – by June 4 I observed 18 newborn lambs, by July 4 I observed only 1 remaining lamb in this group. This is less than a 2% survival rate, you need at least 30-40% survival for a viable herd. On most of my flights I have observed eagles (golden and bald) feeding on lambs that they have knocked off the cliff sides. These are the largest and most destructive group of predators on sheep lambs.

Seems strange that the intensive predator control program in this area does not address this situation – nothing has been done about eagle predation since 1959. If game is going to be managed on any basis, subsistence or for the sports hunter, then ALL predators need to be managed.

Respectfully submitted

Ray Atkins, Master Guide #70
P. O. Box 22, Cantwell, AK 99729

presented at Denal. Advisory meeting 1-29-15
supported by committee

Please read at Board of Game meeting



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Togiak National Wildlife Refuge
P.O. Box 270
Dillingham, Alaska 99576
Phone 907-842-1063
Fax 907-842-5402



January 26, 2015

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Members of the Board of Game:

The Togiak National Wildlife Refuge appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its February 13-20, 2015 meeting addressing Central/Southwest Region issues. We reviewed the proposals that could potentially affect resources on the Togiak National Wildlife Refuge and offer the following comments for Proposals 49, 52, 54 and 130.

Proposal #49 - Neutral

Rationale: Extending the window by 1 month in which a season up to 31 days may be announced by emergency order could provide hunters with more opportunity to harvest moose and would make the hunt administratively easier to accomplish. As winter progresses, however, moose tend to move toward the coast and group up, potentially exposing them to greater physiological stress by hunters. We concur with the rationale provided in the proposal to require "antlered" bulls be harvested for RM575.

Proposal #52 - Oppose

Rationale: It is premature to add an additional 5 days (a 45% increase in season length) to the nonresident moose hunt in Unit 17A after only 1 season. The author of the proposal is incorrect in asserting that a nonresident closed area was established by the Board of Game. Aircraft access for moose hunters was restricted in a portion of Unit 17A but not for all tributaries of the Togiak River. This aircraft access restriction applies only to moose hunters and includes residents and nonresidents alike. We are opposed to establishing a nonresident closed area for hunting moose in Unit 17A.



Proposal #54 – Oppose

Rationale: Brown bear harvests in Unit 17 have steadily increased over the last 30 years due to liberalized seasons, harvest limits, and tag fee exemptions. If passed, Unit 17 would be the only area in the state where brown bear hides and skulls could be sold. This would likely further increase the harvest of brown bears in Unit 17, and may result in the increase of brown bears harvested in adjacent GMUs by hunters claiming they were taken in Unit 17 in order to sell hides and skulls.

Proposal #130 – Oppose

Rationale: The taking of wolves same-day-airborne within an Alaska National Wildlife Refuge is generally prohibited under 50 CFR 36.32 (c)(1)(iv) which states: “It shall be unlawful for a person having been airborne to use a firearm or any other weapon to take or assist in taking a wolf or wolverine until after 3:00 a.m. on the day following the day in which the flying occurred, except that a trapper may use a firearm or any other weapon to dispatch a legally caught wolf or wolverine in a trap or snare on the same day in which the flying occurred. This prohibition does not apply to flights on regularly scheduled commercial airlines between regularly maintained public airports.”

Thank you for your time to review our comments on these proposals. If you have any questions, please contact Patrick Walsh at (907) 842-1063.

Sincerely,

Susanna Henry

Refuge Manager, Togiak National Wildlife Refuge



BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257



Tribal Councils
Served by BBNA:

- Aleknagik
- Chignik Bay
- Chignik Lagoon
- Chignik Lake
- Clarks Point
- Curyung
- Egegik
- Ekuk
- Ekwok
- Igiugig
- Iliamna
- Ivanof Bay
- Kanatak
- King Salmon
- Kokhanok
- Koliganek
- Levelock
- Manokotak
- Naknek
- New Stuyahok
- Newhalen
- Nondalton
- Pedro Bay
- Perryville
- Pilot Point
- Port Heiden
- Portage Creek
- South Naknek
- Togiak
- Twin Hills
- Ugashik

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

January 30, 2015

Dear Alaska Board of Game:

The Bristol Bay Native Association (BBNA) is a Tribal Consortium, made up of 31 Tribes and is organized as a non-profit corporation to provide a variety of educational, social, economic and related services to the Native people of the Bristol Bay region of Alaska.

The Mission of BBNA is to maintain and promote a strong regional organization supported by the Tribes of Bristol Bay to serve as a unified voice to provide social, economic, cultural, educational opportunities and initiatives to benefit the Tribes and the Native people of Bristol Bay.

Our Natural Resources Department is dedicated to protecting, maintaining and preserving the land, ecosystems and natural resources of Bristol Bay; while empowering our Tribes to enhance their subsistence, cultural and economic opportunities as described in the Bristol Bay Vision.

This is done by working to achieve our three core purposes, which are to:

- Protect the rights of Bristol Bay Tribes to choose how to continue to meet their subsistence, cultural and economic needs; and
- Further natural resource management goals of Bristol Bay Tribes, consistent with traditional stewardship, sustainability and self-reliance.
- Ensure effective participation from the Bristol Bay Region in all state and federal regulatory processes that effect subsistence resources.

After thorough review of the Alaska Board of Game's 2014/2015 Proposal Book, we would like to briefly outline our position on the proposal which most greatly affect our tribe's ability to harvest our traditional foods. Our support or opposition of the proposals below are justified in our Natural Resources Department's mission and core purposes.



Unit 9 & 10 – King Salmon Area

BBNA Supports Proposal(s) 44 and 45

Unit 17 – Dillingham Area

**BBNA Supports Proposal 47 with the amendment suggested by the Nushagak Advisory Committee. BBNA Supports Proposal(s) 48, 49, 51, 54, 55 & 56
BBNA Opposes Proposal(s) 50, 52, 53, 57**

Regional and Multiple Units within the Central/Southwest Region

**BBNA Supports Proposal(s) 126 and 130
BBNA Opposes Proposal(s) 125, 132, 134, 135 and 136**

Unfortunately at this time, our staff will be unable to attend the Central/Southwest Region meeting next month therefore we are submitting this public comment to incorporate our sentiments into the record. Our staff works diligently with the Local Advisory Committees in our region and is available for follow-up if more information is requested. Please contact Courtenay Carty, Director of Natural Resources at ccarty@bbna.com or by phone at 907-842-6244.

Sincerely,

Ralph Andersen
President & CEO



Matt Tobin
18940 Eaglewood Loop
Eagle River AK 99577
907-726-7609

January 28, 2015

ATTN: Board of Game Comments
Alaska Dept. of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Potential Regulatory Changes to Dall Sheep Hunting

Dear Members of the Board of Game:

The above photo is from last year's sheep hunt. We hunted the most heavily hunted area in the entire state and we were able to find and shoot 4 rams. We missed another monster but that's a long story. From left to right we have a 9 year old double broomed ram, a 10 years old ram that measured 39.5" an 8 year old full curl ram, and another 8 year old full curl ram. These rams were taken in the same area that others hunters where hunting and the most heavily hunted part of the entire unit. How can that be possible you ask? How can a ram get to 10 years old and be that big, with so many hunters looking for them? It's because these animals have adapted to the situation and know where to hide. The biggest ram in the middle lived to be that big because he was lying in the bottom of this small rocky drainage covered in dirt and everyone was looking at the top of the mountains from below. This ram had learned to outsmart hunters by staying off the top. The last ram was bedded in a bowl that could only be seen by an airplane or someone that knew he might be hiding there. Every year I hunt the same area getting to know the hiding spots of these rams. I keep track of the numbers of rams that I see that will be legal the next year and the year after that. Last year on one mountain I counted 42 immature rams and 5 rams that will be legal this coming year. On another mountain I counted 6 rams 1 legal and 5 that will be legal this year. On another



mountain I counted 12 rams 1 really large 40" ram and 4 that will be legal this year. On another mountain I counted 13 rams two almost legal last year, for sure legal this year. All of these sheep that I have just talked about are within walking distance and all of these sheep were living care free lives with no other hunters in sight. All of these sheep were within 20 miles of each other.

I have hunted this area in the first days of the season and I have hunted it in the last part of the season. I have always seen legal rams. I have talked to many hunters that are mad because they see hunters and assume it's hunted out. What I have come to know is that hunters don't hunt as hard as they should. What I know is that sheep get overlooked. My income is about 45,000 a year so I cannot afford airplanes, ATV's, or even a boat at this time. I do all of my hunting on foot. The area that I hunt usually has about 8 hunters at the trail head, and anywhere from 10-14 guys going in the same direction I am. There are several drainages that usually have 2-8 guys going up and I usually see between 2 and 8 airplanes in my area. There are 3 guided outfits that I know of in my area and they usually have between 2 and 4 clients hunting sheep in the same area. As we hike hunters begin to drop off at likely looking areas and set up camps. Our group continues to areas I have scouted out prior to the season and that are further than the average hunter is willing to walk. Most hunters will only go about 1-2 miles from the trail head in search of a ram. And most will not tackle tough rocky terrain. Some old timers simply wait until a ram gets pushed to them.

So please know that the rams are there the system does work, it's simply a lack of knowledge and grit that keeps hunters from finding and bagging their ram.

Sincerely Matt Tobin

(First guy in the Photo)



PO Box 2850, Valdez, Alaska 99686

Alaska Dept. of Fish and Game
Board of Game
PO Box 115526
Juneau, AK 99811

RE - Central Southeast Meeting

Proposals 209- Support Proposal 210 - Oppose Proposal 211 Support

Board Members,

As President of the Prince William Sound Charter Boat Association I am writing to state our associations support for Proposal 209 - One black bear every 3 regulatory year and Proposal 211 - Season change from Sept. 10 to Sept. 25. Members also oppose Proposal 210- black bear registration hunting

At a meeting November 18th we discussed the black bear regulation issues that have now become proposals 209-211. The consensus among members was our black bear population has declined over the past several years. It was also mentioned that clear population estimates are not available. A single motion was made to support a regulation of One black bear every 3 regulatory years AND if more restriction is deemed necessary by the Board a second regulation moving the opening of the fall season from September 10th to the 25th AND to oppose a registration hunt for black bear in Unit 6D. The motion carried with 9 members supporting , 1 abstaining and 1 undecided.

Prince William Sound Charter Boat Association is an association mostly of charter boat business owners. We have approximately 18 members with at least 4 members that are Big Game Transporters. We have supported a number of regulations that have been detrimental financially in an effort to maintain a healthy black bear population and avoid regulations that would be extremely detrimental to our members- such as registration hunts. Past regulations we supported by letter or in person include:

No shooting black bear from boats

Season reduction June 30- June 10

Season reduction September 1 to September 10 (second time it was submitted)

Thank you for taking the time to read our concerns and for your service on the Game Board.

Sincerely,

//Signed//

Melvin Grove

President / Prince William Sound Charter Boat Association



From: [Shawn Phillips](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Board of Game Central Southwest Meeting Proposal 209, 210, 211
Date: Wednesday, January 28, 2015 1:34:25 PM

Board of Game Central/Southwest Meeting

Proposal 209 - Support

I believe that by restricting the harvest limits to one black bear in unit 6D every three years will reduce the actual harvest numbers as this area cannot sustain a hunt at its current harvest limits. Sow's are an important part of the sustainability and this would also lower the harvest of sow's which will allow for a sustainable hunt in the future and preserve the species.

Proposal 210 - Oppose

I oppose this hunt from becoming a registration hunt for black bear in unit [6D](#) because of its close proximity to Anchorage and the popularity of the hunt.

Proposal 211 - Support

For the reasons of support of proposal 209 I support this proposal to modify the hunting season to open September 25, through June 10 for unit 6D for black bear. This would lower actual animals harvested and reduce the number of sow's harvested to allow for sustainability and preservation of the species.

Shawn Phillips
PO Box 672
Whittier, AK 99693
907-227-2004
shawn.m.phillips@aol.com



From: [Larry Gilman, President](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals 209, 210 and 211 Comments
Date: Wednesday, January 28, 2015 2:05:30 PM

Board of Game Central/Southwest Meeting,

I would like to submit comments for the following proposals for consideration.

COMMENTS

Proposal 209 **SUPPORT** for limiting black bear to unit 6D to one bear every three regulatory years. If this regulation is adopted it would reduce the amount of harvest in this unit and keep it a viable hunt for the future.

In unit 6D I have seen a steady decline in the bear population. I believe it is partly due to the smaller boats being able to access this area easily. I also believe that hunters are harvesting for the pelt only and not for the meat.

Proposal 211 **OPPOSE** I am opposed to this adoption because it shortens the season and does not take into account the harvest of the small bears and because I believe that the younger bears will be harvested in the spring and a steady decline in the bear population will continue.

Proposal 210 **OPPOSE** I oppose this registration hunt for black bear because I believe that this will provide an opportunity for a large amount of bear hunters to target a certain season of bear. This will put a great deal of pressure on the bear population. I believe this will promote people to shoot first rather than look for the full size bear. This would be a "race" to reach a quota.

Larry Gilman

President

907-472-2429 (Office)

907-360-5006 (Cell)

larry@custommarinesvcs.com



Comments for the Central/Southwest ADF&G Board of Game Meeting

By: Stephen K. Springer Jr

I was one of the lucky sheep hunters who got the Alaska Sheep Hunter Survey that Todd Brinkman put together. I answered the questions honestly and followed up by going to his meeting and saw the responses. No surprises really. The biggest problem I had with it was that it didn't get to the main reason why residents "feel" crowded. I believe that reason to be that the guides have all the honey holes locked up for their use, and there are a lot of them and they lock up a lot of real estate. I know its public land and we can hunt were they do, but that's not fair to the Nonresident (NR) and who would want the confrontation with the guides. With the best areas locked up, that leaves the Residents (R) hunting the small pockets of rams that are near access points which are limited. More and more transporters are working these access points to their limits and sheep are moving farther and farther away from them do to the pressure.

The need to place some areas into draw hunts, due to declining sheep populations, results in more concentration in general harvest areas. I know there are less sheep hunters each year, and I'm sure it's due to these frustrations and lack of success. The higher success rate of NR's is out of proportion and is due in large part to the fact that the guides get the best sheep real estate and of course their resources and experience. This is where the change needs to occur. The non-resident take of sheep in Alaska is approximately 46% for the entire state (with certain problem areas being as high as 80%). Resident hunters have a 25% success rate. This number is much higher than how other states allocate their non-resident harvest. In theory, if the non-resident harvest was lower, those sheep could be harvested by residents

NR's should not harvest twice as more sheep than R's that is unheard of in other states. The results of the survey show the greatest level of agreement upon cause was more professional guides, yet the BOG proposals seem to dismiss this altogether.

This leaves us to the question of what do we do about it? I feel that we need to limit the number of guides like the feds do with a guide concession program for the state. Yukon Territory does it and it works, the Feds. Do it here in AK and it works. This would be my preferred option. We need to fund DNR properly and an increase in the cost of tags for R's and NR's could help a little and is long overdue. ADF&G does not actively manage Alaska's sheep populations, rater they rely on the low harvest of only mature rams to prevent overharvest. This doesn't take into account mortality from other causes, more sheep surveys need to be done annually.



In regards to specific proposals, I have the following comments:

PROPOSAL 207 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Modify sheep hunting opportunities statewide.

I am in support of # 1. From August 10 to September 20 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purpose of Dall sheep hunting. Using an aircraft for the purpose of spotting sheep or locating Dall sheep during the open hunting season is prohibited. I am not in support of the #2 and #3 of this proposal however. I support #1 because I have seen, first hand, hunter/pilots looking for sheep during the season and have been accidentally buzzed while sheep hunting from pilots intently looking at sheep I was stalking. I feel this is not very sporting. This tactic is commonly used by guides which is one of the reasons NR's have higher success rates.

PROPOSAL 208 - 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep, and 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts. Review and potentially modify sheep hunting opportunities statewide.

I oppose options for residents in Proposal 208 for many reasons. Draw options for dates will just change when we are all in the field, because as written, most R's would all choose the same option. As for registering according to his/her last name, this would not allow me to hunt with my partners as their last name is not in the same group. I'd have to hunt by myself and that is unsafe.

Options for NR's, I support #2. Nonresident hunters on private, state, and BLM managed lands will be entered into a limited draw from Aug. 10 to 31, (permit allocation by Subunit) followed by a general season harvest ticket hunt. This would earn the state more money for doing sheep surveys, plus give NR's a chance without needing a permit in the late season.

Thank you for considering my comments,

Steve Springer

AK Resident Hunter since 1996



January 29, 2015

Dear Board of Game Members,

As a lifelong Alaskan resident and professional Master Big Game Guide & Outfitter I would like to comment on the board generated proposals before you, specifically those regarding the allocation of Dall sheep hunting opportunity here in Alaska, as well as the use of aircraft for hunting; proposals 207 and 208. I will make every effort to be as brief and succinct as I can be in my comments.

As experienced by myself, and many others, there has developed an ever increasing social and/or overcrowding problem and issue here in Alaska when in the pursuit of Dall sheep.

The recent Alaska Sheep Hunter Survey Report by Dr. Brinkman and the ADF&G 2014 Dall Sheep Board of Game Report has helped to shed some much needed light and insight on this growing and contentious issue. The issues involving our Dall sheep currently are not biological nor conservation based but instead entirely social. The data has been presented and, while unpalatable to some, the fact is that eight out of ten sheep hunters (80%) on any given sheep hunting mountain are resident hunters and only two (20%) are non-resident guided hunters yet it is the non-resident hunter and fisherman that helps to support approximately 80% of the ADF&G budget. I would also like to point out below, in bullet form, a few other pertinent facts as to the economic contributions non-resident hunters and guides, and the guiding industry, make to our states economic welfare as I consider any drawing system to be, in essence, the “death” of any full-time sheep guiding operation as there is little to no predictability or stability after a drawing system has been implemented.

The following figures were obtained from the independent study, done by the McDowell Group, commissioned by the APHA, based upon 2012 data, the most recent complete data set available at the time of publication:

Guiding in Alaska has a Total Economic Activity Impact of \$78 million per year

\$51 Million in New Dollars to the State Economy through license and tag sales

\$12 Million in spending on Goods and Services in **Rural Alaska**

\$1.95 Million in Direct Revenue (ADF&G) in Non-Resident License & Tag sales, which significantly contributed to the \$14.9 million in Pitman-Robertson funds in 2012.

703 licensed registered/master guides

89% of licensed Guides are Alaska Residents (Registered / Master Guides)

299 were contracting guides



119 guides guided took 1-5 hunters

67 guides took 6-10 hunters

52 guides took 11-15 hunters

24 guides took 16-20 hunters

19 guides took 21-25 hunters

18 guides took 26 or more hunters

46% were guided on State Land

Guided Hunting Provided 2,210 jobs

1,620 direct jobs for guides and packers

\$21 million in wages

\$13 Million in wages in **Rural Alaska**

3,207 hunters and 500 non-hunting companions were hunting visitors to our state

\$3.5 million pre and post guided hunt spending

I will not deny that there is an ever increasing over-crowding issue with Dall sheep hunting today in many areas of our state and I fully agree that this issue does need to be, and should be, addressed but we all must now accept the fact and carry the shared responsibility that we are all contributors to this problem. It is a problem and issue caused by transporters / air-taxi operators, guides and their non-resident hunters AND resident hunters and their second-degree of kindred relatives. As such, whatever measures you take and regulations you may implement I feel strongly that they should be the same measures for all sheep hunters, regardless of where they may reside.

I would urge you to please consider implementing some alternative regulations, or intermediary steps, before taking the huge, and perhaps irreversible, leap into a statewide drawing system for sheep allocation. I think there is a valid and real concern for the “spill-over” effect in any measures that are implemented and I would like to see whatever measures are taken with regards to sheep hunting be applied statewide, unless other measures are currently in effect.



I am sure you have, and will, be presented with many alternatives to a statewide sheep drawing system but of the various ideas I have heard to date, below is the one that I am most in support of.

One every four years:

I think implementing a harvest “one every four years” regulation, just as we have with brown bear in many of the coastal regions of this state, deserves serious consideration. In the interest of saving you time I will not go into great detail with regards to the merits of implementing a “one every four years” rule for sheep but it does allow everyone to go hunting each and every year if they so choose but perhaps it will make them think longer and harder, and deliberate with themselves a bit more on the hill, before taking a shot at a ram knowing that if they harvest said ram they will not be allowed to harvest another ram for four years.

Initially this alternative would not likely have much of an impact on the over-crowding issue experienced in many regions of the state but over time I do believe it could have a positive effect on the crowding issue and could encourage the selection and harvest of older, more mature “trophy” class rams and I would like to see it implemented and given a chance to work before a drawing system is implemented.

Proposal 208:

I am opposed to this proposal but if I were forced, and that is what it would take for me to accept proposal 208, to accept it than I would opt for option #2 for non-resident hunters and option #1 for resident hunters so in essence the August 10th to 31st time period would be drawing hunts for all hunters.

Further, should the above drawing system be implemented, or any variation thereof, I would suggest that no one guide, group or entity be allowed to submit more names / applicants to any application pool than there are permits available for that area (e.g. if GMU XXB has 10 Dall sheep permits available under a new drawing system than no one guide, group or entity shall be allowed to enter more than 10 names/applications into the drawing pool for those ten applications).

I fully agree that non-resident hunters on USFWS and NPS managed lands are already very limited and restricted so this proposal does not, and should not, address or affect those hunters and hunt areas.

**Proposal 207:**

I am in support of this proposal and specifically option #1.

The argument has, and will, be made that any proposals along these lines are unenforceable and I would suggest that is not entirely the case. In our current day and age of technology almost everyone is carrying with them a “smart phone” and more and more I am seeing hunters (resident, non-resident and guides alike) carrying these phones into the field on a daily basis. As such, everyone is carrying a video camera with them as well since most all of these advanced phones can, and do, easily take video footage. As such, it would not take much effort to capture in video, or in photo, format flying behavior that was not ethical and/or was contrary to the language and intent of this proposal. That footage and an accompanying complaint could then be turned into the proper authorities to be investigated. While this proposal might not prevent all such behavior I do believe it would help to curb the misuse of aircraft. I have plenty of video footage over the last 20+ years that we have filmed our hunters’ hunts of aircraft not being used ethically by others unassociated with our hunts but not technically breaking any regulations or laws. Simply having a law in regulation can help to educate the public as to what is ethical, acceptable and allowable behavior and what is not and its human nature, I should hope, to try to be in compliance with the rules and regulations. A small percentage of pilots might ignore this regulation but they are the same ones that might very well ignore many other regulations as well and they are the ones that may be using their aircraft improperly. I would like to believe most of the pilots do not currently actively search for, spot and locate sheep from the air and as such this proposed regulation should have little to no effect on them or their sheep hunting activities but for those that do abuse the use of aircraft there would now be a tool for the public to use to bring attention to their unethical behavior.

Without further clarification for options #2 and #3 as to what would, and would not be, permissible under those two options, I do not currently support options #2 and #3 of proposal 207.

I thank you, board members, for your continued service to our state, its people and its resources and appreciate the time, effort and diligence you bring to your efforts and decisions.

I think it would be prudent to look at our states nearly 40 year old sheep management plan and consider updating and revising it to bring it more current with the changes that have occurred within our state over the last four decades and would encourage you to solicit the help of a sheep working group in that effort.

Should you feel it required to make some radical changes now, without a revised sheep management plan, I would again ask you to please seriously consider, at least initially, an alternative to implementing a statewide Dall sheep drawing system and would suggest the “one every four years” option does have merit worth serious consideration but whatever path you choose I implore you to make the allocation and regulations the same for all hunters regardless of their residency status. While the minority (the guided non-residents) may overall be more successful than the majority (the resident hunters) it is the minority that to date has been carrying



the financial burden and contributing the most financially to the efforts to keep sheep on our mountains.

Respectfully,

Henry D. Tiffany IV

Lifelong Alaskan & Master Big Game Guide



From: [Alice Smith](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Board of Game Comments
Date: Thursday, January 29, 2015 7:59:12 PM

Alaska Board of Game

Central/Southwest Meeting

Comments for Proposal 209

I support the proposal to change the regulation from one bear every year to one bear every 3 regulatory years.

Prince William Sound is a great area to hunt when not overrun with hunters. This regulation will improve hunting for all hunters.

It is a much better option than registration hunting.

Thanks,

Dennis Smith
P.O. Box 326
Willow, AK 99688



Scott Luber

5918 East 22nd Ave
Anchorage, AK 99504
(907) 830-8733

info@provingtrailadventures.com

January 28, 2015

ATTN: Board of Game Comments
Alaska Dept. of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Potential Regulatory Changes to Dall Sheep Hunting

Dear Members of the Board of Game:

Proving Trail Adventures is a small home-based video production company that focuses on DIY Dall sheep hunting in Alaska. I started this company in 2012 after my hunting partner and I saw a need within the sheep hunting community for more education and outreach, because better sheep hunters in the field means a better sheep hunting experience for everyone. We have had the privilege of hunting sheep across the state on a mix of state and federal lands. We are the only two hunters to have taken a ram from all seven major mountain ranges in Alaska on walk-in hunts (that we know of). Our DIY instructional video has been very successful and as a result I have had the fortune to hear from many sheep hunters. Most of these stories have been encouraging recaps of the types of impacts hoped for: how hunters have made smart choices regarding ram legality and been inspired to push harder to be successful than they might have otherwise. Based on personal research, experience and input received through my business I have some comments to add to the record.

I, like many Alaskans, am concerned about the future of sheep hunting in Alaska. My concern stems from the potential for sweeping changes to sheep hunting regulations that address localized issues and may unnecessarily restrict resident opportunity. The main issue seems to be a perception of crowding and competition. ADFG has reported that there has actually been a declining trend in hunter numbers. It is my opinion that the crowding issues are a result of bottlenecks at popular airstrips and along high use ATV trails. It is also well known that a high percentage of hunters are in the field and corresponding high percentage of the annual harvest occurs opening week. There are also several guide use areas that are heavily targeted by guides. I think that hunters willing to distance themselves from traditional start locations, hunt later in the season and/or avoid high use guide areas will have a more aesthetic hunting experience.

Sheep populations have declined over the past decade. This is surely contributing to competition for legal rams. However, it is my belief that current hunting has contributed little to this decline and is more a function of weather, predation and other natural events. Changes to the regulations will not likely result in increased sheep populations. In the areas I have hunted I still generally find multiple legal rams and think there is an available surplus of rams. The harvest record suggests this as well. Sheep hunting is very difficult. Success tends to be related to the amount of effort put into it. I believe there are still available rams in uncrowded hunting conditions but the time, effort, and mental fortitude required to find them is increasing. Frankly, I am opposed to regulations that attempt to make sheep hunting success easy, especially if the issues raised are allocative in nature and related to hunter attitude, effort, and expectations.

With as much information as Brinkman's recent sheep hunter survey gathered, I don't think it adequately captured hunter effort or expectations. This missing information may be critical for any potential decisions. For example: what success rate do sheep hunters expect for themselves? How far from their mode of transportation are hunters willing to walk to find a legal ram? If perceived crowding and competition issues are stemming from an expectation of a relatively easy sheep hunt, that would support the theory that complaints are stemming primarily from hotspot bottlenecks and high guide use on unlimited state lands.

I am disappointed the state guide use concession program has stalled. I was optimistic that this program would relieve a lot of the crowding and competition issues. I have also noted from my personal research that there does appear to be a few unscrupulous guides willing to harvest at unsustainable levels in localized areas. The concession program might have weeded out some of these "bad apples" and significantly reduced some of the free for all situations occurring on state lands. This would have benefited local sheep populations as well as guides who operate ethically under sustained yield principles. The guide concession program would have been a cleaner solution than some of the proposed restrictions to nonresident hunters. I acknowledge the important economic contribution nonresident hunters make to both the Alaska economy in general and specifically to wildlife management. However, I see the benefits of concession programs on federal lands and still hope to see similar programs on state lands in Alaska.

I am excited to see resurgence in sheep research and believe that is a key to responsible management. To that end I am in support of sheep hunters helping to foot the bill. I understand the BOG can't change license and tag fees, but we urge the BOG to solicit the legislature for these changes. Resident sheep hunters are willing to pay a nominal fee (\$25-\$50) for a sheep tag if they knew their dollars were going to help fund sheep management. I also believe nonresident tag fees are absurdly low in comparison to other western states. I recommend nonresident sheep tag prices closer to \$1000. Nonresident tags for other species should be examined as well.

In regard to specific proposals:

- Earlier Seasons for Residents: Opposed. There is value to long standing traditional hunt dates. Forty days is ample opportunity for residents. Currently there is one pulse of high harvest and participation. This idea could create two: a resident pulse and another non-resident pulse resulting in overall higher harvests. Adding length to the resident season



might increase resident harvest, at least initially, but I doubt there would be a corresponding decline in nonresident harvest.

- Change all general seasons to registration or draw hunts: Oppose. The most critical element of sheep hunting for me and many residents is the opportunity to participate annually. Registration hunts can create a derby style hunt and draw hunts eliminate the certainty of being able to hunt every year.
- Shorter season for nonresidents: Neutral. This idea is similar to an earlier season for residents in that it could result in two harvest pulses. It does have the potential to reduce nonresident harvests. Although it is possible that guides will adapt and be able to maintain their harvest levels.
- Drawing permits required for nonresidents: Support. If the board determines there is an allocation issue, then residents should get priority over nonresidents per the Alaska constitution. Since nonresidents likely do not hunt sheep in Alaska annually, there is minimal hardship to this user group. The biggest impact would be to high volume sheep guides.
- Limit nonresidents hunting with 2nd degree kindred relative: Neutral. I feel this is a fantastic perk to being an Alaskan resident. Success rates are more in line with resident success rates. However if there is an allocation issue, residents should have priority.
- Resident only hunts: Oppose. This has the potential to increase resident crowding in these hunt areas as well as increase crowding in nonresident allowed areas unless there is some restriction placed on nonresident hunter numbers. I note that hunter crowding and low numbers of legal rams is still an issue in some places such as the Kenai Mountains that traditionally see little guided hunt effort. Restricting participation in one area could result in squeezing more hunters into smaller areas.
- Limit hunters to hunting only one area: Oppose. Most hunters are only going to do one main sheep hunt per year anyway, so this idea would only affect a small percentage of hunters and have little impact.
- Require training or orientation for all hunters: Support. Particularly field judging legal rams. Proving Trail Adventures was founded on the idea of training up better sheep hunters and would fully support state-sponsored orientations. I have seen high hunter interests in further sheep hunting education.
- Changes to sealing requirement: Oppose. While there have been some consistency issues within ADFG and Wildlife Protection, I support the accountability that sealing has brought to the sheep hunting community and trust that ADFG is working to streamline sealing procedures.
- Changes to full-curl bag limit: Oppose. I strongly support full curl management. I believe it provides for maximum opportunity and participation as well as being a high standard. Full-curl regulations limit harvests to mature rams which helps protect herds from over harvest. Reduced horn curl requirements would require limiting opportunity. I also believe part of the challenge and reward of a successful hunt is the ability to locate mature rams.
- Reduce bag limit (1 in 4, etc.): Oppose. Very few hunters take more than one ram in a four year period. This idea would punish a small group of elite sheep hunters who are highly committed and would have no impact on ram demographics or sheep populations.
- Changes to same day airborne restrictions: Support. Sheep hunting ethics are very personal and variable between hunters. However I would support regulations that remove

or reduce advantages given to hunters who locate sheep from the air and can pursue those sheep almost immediately.

- Restrict transportation used in some areas: Neutral. As a walk-in hunter the idea of additional controlled use areas is appealing. However, more walk-in areas potentially increase bottlenecks at the remaining areas open for motorized access. If the Board decides to implement restrictions to resident sheep hunters this would be our preferred approach since it does not reduce season length or the opportunity to participate.
- Restricted weapons hunts: Opposed. Increasing the season length for a specialized user group does not seem like a good strategy during a period of allocation issues. I anticipate a majority of hunters utilizing an early restricted weapons hunt would pick up a center fire rifle on the regular opening day if unsuccessful early.

In regards to the board-generated options for sheep hunting regulatory changes (RC 9):

- Status Quo: Neutral. I recognize that some hunters are experiencing a crowding or competition issue but again believe these situations are localized. I would be satisfied to see regulations remain status quo particularly if it is an interim approach while ADFG produces a comprehensive statewide sheep management plan. At the same time I see the value in addressing current allocation issues with some type of nonresident restriction.
- Existing draw hunts will stay the same: Support. The current draw hunts provide a special opportunity for those lucky enough to draw while maintaining adequate opportunity for general harvest hunts. The exception being I would support increased opportunities in the Chugach Mountains outside of Unit 14C. This could come in the form of a registration hunt or a general season with motorized access restrictions. Data acquired from recent research in this area should provide the best support for or against an increased opportunity for resident hunters. This area going to draw might be contributing to crowding issues in other areas.
- Options for nonresident hunters (options 1 & 2): Support. Either of these options (entire season goes draw or just Aug 10-31) would be a good conservative first step in addressing allocation issues. We're not convinced option 2 (Aug. 10-31 draw) would result in an overall reduction in ram harvest but it may relieve some crowding issues during the time period a majority of resident sheep hunters utilize.
- Options for resident hunters draw hunts (options 1-4): Oppose. These are the types of sweeping regulatory changes not needed at this time that would unnecessarily restrict resident opportunity. While not unprecedented in Alaska with other species (primarily caribou), these hunt scenarios would be a radical departure from the traditional sheep season. Any sheep conservation or allocation issues should first be addressed conservatively through limitations to nonresidents and evaluated before further restrictions are imposed to residents. I believe it would be over-reaching to implement these proposals to address localized issues.
- Options for residents (option 5): Oppose. This idea would separate long standing sheep hunting partnerships and penalize the few dedicated teams who enjoy going into the field with a reasonable hope (based on their planned and implemented efforts) to have a chance at successfully filling two tags on one trip. This option also cuts a traditional 40 days of opportunity by 2/3rds.



- Potential changes to use of aircraft (options 1-3): Support. Again, sheep hunting ethics is very personal and variable between hunters. I believe starting a stalk based on a ram just located from the air reduces an element of fair chase.

It is my conclusion that any current conservation issues with sheep in Alaska are the result of weather, predation and other natural factors and that sweeping regulatory changes to hunting will do little to put more sheep on the mountains. I am in favor of maximum resident hunting opportunities under full curl management. Sweeping statewide regulatory changes are not necessary. I believe that the current crowding and competition issues are localized and in some cases linked to hunter expectations and effort. Sheep hunting is hard and no amount of regulations can change that, nor should it.

I would like ADFG put forth a formal comprehensive sheep management plan prior to implementation of any sweeping regulatory changes. If the BOG decides to make regulatory changes it is my hope that you will start by conservatively limiting nonresidents initially and then evaluating before cutting resident opportunity.

Thank you for the opportunity to comment.

Sincerely,

Scott Luber
Proving Trail Adventures





To -Alaska Board of Game

Re- Central/Southwest Meeting

Proposal 209 Support **Proposal 210 Oppose** **Proposal 211 Support**

Greetings,

My name is David Pinguoch, author of Proposals 209 and 211.

Proposal 209/ one bear every 3 regulatory years

Why 3 years? - 3 years produces the most benefit per year. The 3 year restriction reduces harvest by about 50 bears per year based on approximately 29 hunters would harvest a bear the second year and 20 would harvest a bear the 3rd year. The 4th year this drops to 13 hunters based on 2009-2013 stats. I am not opposed to 4 years but the value for the added restriction is marginal.

Benefits of Proposal 209 -

- **50 bear per year harvest reduction**
- **Less hunters in field** -Majority of black bear harvested in Unit 6D are by boat - once a boat owner harvests a bear not only will he/she be restricted from hunting it is likely he/she will be less likely to take out friends bear hunting because he/she won't be able to hunt
- **Improved quality of hunt** - less hunters in the field will improve quality of hunt
- **Reduced sow harvest** -Statistics show hunters who shoot bears annually are more likely to harvest sows in 2nd and 3rd year than the 1st year
- **Reduced sow harvest** - It is likely some hunters will be more selective in the bears they shoot when restricted to one every 3 years

Proposal 211 / moving opening day from Sept. 10 to Sept. 25 -

Why September 25th? Most black bear have moved off of salmon streams by the 25th where they are most vulnerable to hunters. Staggered season openers - October 1 is when doe season opens. I prefer to avoid putting 2 groups of opening day hunters in the field simultaneously, although the number of bear hunters would probably be low in the fall.



Benefits of Proposal 211 -

- **34 bear annual harvest reduction**
- **Reduced sow harvest** - best protection for sows by percentage of harvest. 53% of bears harvested Sept. 10-25 were sows 2009-2013.

Proposal 210 - registration hunt I oppose this option for several reasons

- **Very detrimental financially to Transporters and Guides** as it is difficult to get commitments from clients who want to book a hunt not knowing if the hunt will occur. Additionally, if the intent of the registration hunt is going to be a temporary measure to increase bear numbers I hope the Board understands it will not just affect years the registration hunt is in place. Once you lose the business, it can take years to reestablish a client base.
- **Detrimental to all hunters** who need to plan time off for hunting
- Unit 6D black bear hunting is **very popular** and a registration hunt could create a hunting situation comparable to the **chaotic** Bristol Bay commercial fishery. Everyone will be in a rush to get a bear before the season closes
- **Increased sow harvest.** With the pressure on to get a bear before the season is closed hunters are certainly going to be less selective which will likely result in an even higher sow harvest which is entirely contrary to the desired outcome
- **Wounded Bear Loss** If the pressure is on to get a bear hunters will certainly be taking risky shots and more bears will likely be wounded and die unharvested

My observations - It is clear the population is down from 10 years ago . On a 6 day hunt 10 years ago the average number of bears spotted was 15-35. In 2013-2014 that number was 10-20. The majority of that decrease the last 2-3years has been sows with cubs

In 2014 I had two sightseeing trips where we anchored in the evening to watch bears feeding on salmon. 10 years ago we would see 4-6 bears over a period of 2-3 hours. In 2014 I saw one bear at one stream and 2 in another. In both areas I went ashore and walked up the streams. As soon as I got to an area that was not visible from the boat, the shoreline on both sides of both streams was trampled down from bear activity. This area was also out of the sunshine and it was warmer than normal in 2014. The average amount of time a bear stays visible is definitely down. Even



young bears seem to get their fish and go back in the woods. 10 years ago they would dine at the stream bank. Bear behavior is definitely reducing sightings.

Food source issues -

In 2012 we had a blueberry crop failure, at least in western Prince William Sound. The next spring the number of cubs spotted was down significantly.

In the 90's when Fish and Game suggests a possible spike in bear numbers, I also saw a spike in the number of pink salmon spawning in streams, particularly a lot of smaller streams. In the past few years I have been seeing a lot less pinks in many of the smaller streams. This correlates to the fishery - since 2011 more than double the number of salmon seiners are working Prince William Sound than 10 years ago. Since 2011 the escapement goals for natural run pink salmon have been lowered.

Coincidence? I have to believe there is plenty of other food options, but is it possible this has had some effect, especially on sows since they don't travel far?

An article on Fish and Games website suggests a possible spike in the bear population in the 90's. If there was a spike what is the traditional population?

Past Board Participation

I have been in the forefront on bear proposals for many years. The first restriction the board passed back in 2003 for Unit 6D was no shooting black bears from boats - I authored that. I supported both seasons changes either in writing or testimony.

I submitted a proposal last cycle to restrict hunters who shoot a sow to one bear every two years which didn't pass. With a lot of help from our new game biologist, Charlotte Westing, statistically it looks like the one bear ever 3 years will not only reduce harvest by 50 bears a year, it actually looks like it will reduce the percentage of sow harvest better than the sow regulation.

It doesn't take a rocket scientist to see my goal is to avoid a significant financial loss from the implementation of a registration hunt. Beyond that, I don't believe a registration hunt is the right choice for a hunt as popular as Unit 6D black bear when it is so close to half of Alaska's population. I think it will increase sow harvest by percentage and further erode the quality of the hunt. Long term I believe one bear every 3 years could turn out to be the best regulation yet for Unit 6D. It may somewhat restore the concept of Unit 6 being a trophy, which was the original intent when the regulation went to one bear more than 40 years ago.

Thank you for your time,

David Pinguoch PO Box 623 Whittier, AK 99693 907 715-7447



From: [Aquetec LLC Prince William Sound Lodging and Research Support](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Central/Southwest Meeting
Date: Friday, January 30, 2015 1:16:11 PM

Proposal 209 (Restricting take to one bear every three years)

Oppose

In my business experience a large percentage of my clients are 'once in a lifetime' bear hunters so restricting the take to only one bear every three years would not really help the bear population. It would affect only the hunters that try and get a bear every year while they're out shrimping and fishing (incidental type hunting) and I don't believe they get one every year anyway. However I don't have the stats on that so it is possible that it could reduce the numbers of bears taken but it seems like it would not be significant.

Proposal 210 (Registration black bear hunt for Prince William Sound)

Oppose

Although making this hunt a registration hunt is the easiest way for ADF&G to manage the hunt, it would adversely affect all commercial operators (guides and transporters based out of Whittier, Valdez, Cordova and Anchorage) that operate in Prince William Sound. They would not be able to take reservations from clients ahead of time (these trips are usually booked 6 to 12 months ahead) because they would never know when the season was going to close. Adversely affecting so many small Alaskan businesses will have an adverse ripple affect on the economy in the area.

Proposal 211 (Shortening the fall hunting season)

Support

Shortening the season by 15 days should help reduce the number of bear taken. They are easy to hunt during September but towards the end of September get harder to find. If this isn't enough, the spring season could also be shortened again at a later date to further reduce the take.

Matt Cline
P.O. Box 643
Whittier, AK, 99693



From: [Heidi Cline](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Central/Southwest meeting
Date: Friday, January 30, 2015 1:18:23 PM

Proposal 209 (Restricting take to one bear every three years)

Support

I think restricting the black bear take to one bear every three years in Prince William Sound would help to reduce the numbers of bears taken over all. Those hunters wanting a bear every season can hunt other areas in between those years to spread their impact.

Proposal 210 (Registration black bear hunt for Prince William Sound)

Oppose

I agree that making this hunt a registration hunt would make it easy for Fish and Game to control the annual take but it would also make it impossible for small businesses (guides and transporters from Anchorage, Valdez, Cordova and Whittier) that utilize that hunt in their business to take any reservations from clients. These trips necessarily have to be scheduled way ahead of time and if the quota was suddenly reached mid-season, they would have to cancel hunts and return deposits which would be crippling to those businesses. It would be too late to book anything else at such short notice. Adversely affecting these small businesses will have a negative ripple effect on the economy in the area.

Proposal 211 (Shortening the fall hunting season)

Support

Shortening the season (either in spring or fall or both) by 15 days should help reduce the number of bear taken. There are still many boats out there in September because the fishing is still good so incidental bear hunts take place at that time. By the end of September, the number of boats heading out to the sound for hunting has been reduced by a significant number (as a result of the weather.)

Heidi Cline
P.O. Box 162
Cordova, AK, 99574



From: [James Blake](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: FW: Central / southwest meeting Proposal 209
Date: Friday, January 30, 2015 4:24:15 PM

From: bimblake@hotmail.com
To: agtc.david@gmail.com; bimblake@hotmail.com
Subject: Central / southwest meeting
Date: Fri, 30 Jan 2015 23:50:32 +0000

To whom it may concern @ ADF&G, The black bears are being heavily hit in PWS ever since the opening of the tunnels. The quality and quantity are both greatly reduced. A bear every 3 years would be very helpful in their recovery. Without adding a lot of administrative work that would come with a registration type hunt. But I would be in favor of some type of regulation on black bears for the PWS. This is something that needs done soon. James A Blake. AK guide # 1207



Submitted By
Stephen Stidham
Submitted On
1/30/2015 11:55:22 AM
Affiliation

Please approve;

The Alaska Backcountry Hunters proposal #111 to limit nonresident sheep hunters in all of Region III,,

For the last 5 years I have had my sheep hunting opportunities affected by guides and non-resident sheep hunters. Through either direct conflict on the ground with guides or by Air Transporters refusing to fly me into drainages because guides work that drainage. The quality of sheep hunting for residents is very poor in many areas where both guides and nonresidents have no limits, because of these issues.

To continue to allow non residents to have primary access to our best sheep hunting areas is unfair to resident sheep hunters. On two of my last 5 hunts I have encountered guide camps setup before the start of the season and had guides inform me that they were waiting on clients to arrive and that they were going to hunt the valleys I had planned on accessing. These were NOT friendly encounters. Guides are dominating state land and thereby blocking residents from having sheep hunting opportunity into the prime areas that sheep inhabit. Guides are influencing Air Transporters to not fly residents in their areas by threatening to withhold their business if they do. Please support this proposal to give resident sheep hunters a fair chance at our ALASKAN sheep resource.



Submitted By
Scott Yeats
Submitted On
1/30/2015 12:00:00 PM
Affiliation

I do not support any of the proposed changes to sheep hunting that are currently before the BOG for consideration. While there are several that attempt to provide solutions to a complex problem they all miss the mark in one way or another. As a resident hunter I can understand and empathize with other resident hunters who feel like their opportunity to successfully hunt and harvest sheep is negatively impacted by non-resident hunters. However, I do not believe that problem is nearly as widespread as some individuals perceive it to be. While the data provided by ADF&G does show several GMU's with high numbers of non-residents relative to resident hunters it seems premature to enact proposals with state-wide impacts.

In my personal sheep hunts over the past 5 years in the Alaska Range, Wrangell's, Talkeetna's and Tanana Uplands I have not seen another individual hunting sheep. This indicates to me that crowding is a localized issue and should not be addressed at the state-wide level. As a resident I am not willing to have my opportunities reduced as a compromise to reducing the numbers of non-residents. If hunter numbers start climbing in the future it makes sense to consider different regulations, but when the number of hunters is falling it doesn't. We are in a time of low sheep numbers which requires patience on the part of hunters. I am very interested in preserving sheep hunting for future generations. If the numbers and science say we are impacting the long term health of the sheep herds via harvest then we definitely need to make changes. If sheep population changes are simply a result of stochastic events than I would hate to overreact and make changes to sheep hunting opportunities that are difficult to undo once enacted.

I would strongly encourage the BOG to reject all proposals that make changes to current sheep hunting opportunities. Future changes can be considered if hunter success rates begin to decline, or hunter numbers begin to increase.



Submitted By
Aaron
Submitted On
1/30/2015 12:00:33 PM
Affiliation

Proposal #52

Adopt Proposal #52 is a proposal I wrote to slightly liberalize non-resident hunting opportunity in unit 17A. It should be very difficult for the Board to justify any of the current restrictions on non-resident hunters in unit 17A. This is the area with the most dramatic dynamics of expanding moose populations anywhere in Alaska History. By ADF&G's estimation moose are at or nearing carrying capacity. Resident hunters have a 2 moose bag limit! There is also a lengthy winter hunting season for Resident hunters. These regulations have been written by a working group that, unlike other working groups that make allocative suggestions to the Board, has no representation from outside the region. The group has no representatives speaking for non-residents and no representative speaking for non-local Alaskans. This area has much more restrictive regulations than areas immediately to the east in the Wood-Tikchik and Nuxagak drainages while these areas have lower moose density, higher resident pressure and more guide activity. These areas have either a registration permit system for non-residents or a general harvest. At minimum I would like to see a 2 mile non-resident closed corridor similar to the Nushagak Drainage (not a no-fly zone). This would allow float trips to terminate in the Togiak River while encouraging non-residents to take out quickly after they get there because they could not hunt. At this point I think it would also be appropriate to include this area in the non-resident registration permit system in place for 17B. How can the board justify such draconian restrictions in one of the most remote moose populations in Alaska that is also the MOST productive moose population anywhere in the state?

Amend and Adopt Proposals 90&91 Have the same goal: To convert 13D goat drawings to registrations. My proposal (91) seeks to simply add this area to RG 580. After further consideration I think 13D should have its own registration hunt or hunts. Up to 3 separate registration areas may be desired to spread pressure. I wrote a proposal three Board Cycles ago to open the southern portion of 13D to registration. This proposal was also opposed by ADF&G yet the board approved it. It has provided up to about five goats per year for hunters that would otherwise not have had this opportunity with zero conservation issues... Now that sheep are on a drawing system the rest of 13D is in a similar situation. There is no longer the incentive for every sheep hunter, in an open system, to also grab a goat tag. Goats are also now much more available for hunters with about half of the total statewide harvest coming from Kodiak Island. Most of unit 13D is very rough country with large areas that most hunters can't access providing goats with a refuge. These proposed registration hunts may reach their quota but it will not be in an opening weekend rush like some more accessible areas. I support a limited registration hunt in unit 13D.

Adopt Proposal #93 The brown bear baiting season in 13D has greatly increased the opportunity for the public to take brown bears in a highly wooded subunit. This is great but it has also caused some conflicts from new users in the area. Having baited in the area for over 10 years these conflicts are new. Incidents of stolen tree stands, trail cameras and confrontations in the field were reported this spring on private property in the unit. By expanding the area to include all of unit 13 and Unit 11, I hope to ease these conflicts slightly by spreading out hunting pressure. This proposal also seeks to increase harvest in areas of Unit 13 that will decrease due to the removal of the area from the extra guide use areas for predation control.

Take no Action on ALL Sheep Proposals. The current suite of sheep hunting proposals deserves more attention and should be worked through in a deliberative process with ADF&G. I suggest taking no action on the current Proposals and directing the Department to write a comprehensive Sheep Management Plan over the next year. A "Working Group" of stakeholders may be necessary to suggest allocation and methods and means to ADF&G in this planning process.

We, as sheep hunters, are a relatively small but extremely passionate group of hunters dedicated to conservation of sheep and the wild places they inhabit. Sheep hunters are often described as fanatics, we live to spend time in the sheep mountains. Sheep hunters would often trade the opportunity to hunt sheep for all other hunting opportunities combined. The decisions you make as Members of the Alaska Board of Game over the next year will be the most important wildlife management decisions made in the lifetime of many of these passionate Sheep Hunters. Please consider this as a truly life-changing decision for many of North America's most dedicated Hunter-Conservationists.

Thank You,

Aaron Bloomquist



Submitted By
David Winney
Submitted On
1/30/2015 2:13:14 PM
Affiliation

Phone
907-835-5341

Email
Wiinney@cvinternet.net

Address
P.O. Box 1063
Valdez, Alaska 99686

I picked Alaska as my place to hunt and fish. Please limit nonresidents before you take residents opportunities away. Residents should be #1. Thanks



Submitted By
Isaac Rowland
Submitted On
1/30/2015 2:36:45 PM
Affiliation

Comments on Sheep Proposals, 208, 209, 106, 107, 118, 119, 121, 123, & 124 :

General comments:

I am a relatively young resident sheep hunter with a growing family (who will be 5th generation Alaskans). As such, I have a long term stake in the proposals and management stratagems being considered. It has been brought up several times that the overall regional sheep management plans are out of date and rarely fully considered in current day management. There have been several suggestions that the various regional plans be re-considered, and I support an effort in that direction. If such an effort were undertaken, I would recommend that ALL current management methods for each region be reviewed, including the current need and justification for draw units, CUA's and possibly even full curl regulations in some areas. Although many continue to serve a useful purpose, the original justifications for many of the draws and CUA's may not be applicable several decades after they were originally put on the books.

However, it is my opinion that this review of management plans and any subsequent changes would most likely be a multiyear process and in no way should the potential creation of a "sheep working group" or similar review process keep the BOG from considering the options currently on the table.

Prop 208 – Board Generated Sheep Proposals

Options for Non-Resident Hunters:

I do not believe that the overall number of non-resident hunters is currently a significant problem for sheep populations on a statewide basis. However, I have observed in the field that in some popular areas, large scale and/or multiple guide operations do have an outsized impact on local sheep populations and hunt quality. Although a statewide draw for NR is relatively harsh way to deal with these problems, I believe it is the only tool the BOG currently has left to shift non-resident hunting pressure from the very popular subunits. I would support a sub-unit level draw as a tool to spread and reduce pressure from identified problem areas. I believe that either the options of general draw or just an early season draw would be acceptable to reach this goal.

Options for Resident Hunters:

With the continuing decline in resident sheep hunter numbers, I do not support further reductions in resident opportunity at this time. These are not the changes that people have requested through the public process. However if the BOG considers these proposals, I have the following comments:

1-3: If a split season (early draw/late general) is implemented, it should be mirrored by a similar season split for non-residents. If this is not done, guides and next-of-kin hunters will logically try and schedule as much as possible into the opening season week "before the general resident season opens", effectively negating many of the positives from this proposal.

If this proposal is considered, the preferred draw season would be August 10-19th to allow for general season hunting of the Brooks Range prior to winter weather. Additionally, if a split resident season is used, it will effectively reduce opportunity by causing scheduling conflicts with hunting seasons for other species.

4. The proposed multiple registration hunts are excessive and complicated. I do NOT support this system in any way.

5. Last Name registration. This method does not work with the traditional method of sheep hunting in pairs. I do NOT support this option.

Prop 207 – Board Generated Aircraft Proposals

1. This proposal would still allow aerial scouting during the pre-season, including August 9th continuing to allow aircraft owners to look for new sheep and sheep areas. Given the remote nature of sheep hunts, I have no problem with this kind of pre-season activity. Making sheep scouting by air illegal during the season would equally affect both guides and aircraft owning residents, but in general is likely to make for less frustration by parties on the ground.
2. No hunting until 2 pm the day after flying. Only a very small percentage of sheep are taken on the first day of hunting, even when aircraft supported. I do not see this option as being of any benefit to either the sheep or the hunters. I do NOT support this option.
3. No hunting with 5 miles for 24 hrs. I see this regulation as being very difficult to enforce and of very little purpose. Again, only a small percentage of sheep are taken with 24 hours of landing. I do NOT support this option.

Proposal 106 & 107 – Change 13D and 14A to full curl.

I do NOT support these proposals. Reviewing harvest data and surveys, I believe that the current system is maintainable and return to Full Curl is unnecessary. In addition, the requirement to set a quota based on surveys of Full Curl rams appears to be logistically problematic. If I am lucky enough to draw a Chugach tag, I would appreciate the opportunity to be able to harvest a mature sheep without



having to consider the last 1/16th of curl.

Proposal 114 – Non-Resident Draw in GMU 20

GMU 20, and in particular GMU 20A has historically been a popular sheep area for both resident hunters and guides. However, the 2006/2007 time frame saw a solid increase in the number of non-resident hunters in 20A while at the same time becoming more popular with residents. This proposal seems to cap the number of non-resident hunters at around the pre-2006 level. I support this proposal as reasonable for this area.

Proposals 118, 119, 121, 123, 124 – Change season dates.

I generally prefer to keep the resident season opener to Aug 10th. If the BOG chooses to stagger resident and non-resident seasons, my preference is to move the non-resident season back 7-10 days rather than moving the resident start date forward.

Staggered seasons between residents and non-residents is likely to have a limited effect on success rates, but should significantly reduce the perceived pressure in many areas by staggering the use of access points, particularly airstrips. If the non-resident season is shortened, it will also functionally limit non-resident pressure by eliminated one “booking slot” and by pushing the season closer to the moose/caribou/bear seasons.

It should be noted that this would also affect next-of-kin hunting parties, which I believe typically comprise >20% of non-resident hunters, and would also effectively change the hunting season for the resident members of those parties, thus additionally spreading out pressure to that additional degree. I do not think staggered start dates should need to be applied to existing draw hunts.

Thank you for your consideration,

Isaac Rowland



Submitted By
Wayne Kubat
Submitted On
1/30/2015 3:52:58 PM
Affiliation
self

Proposal 207- I strongly oppose. This is the gun control argument all over again. Before additional restrictions are added to aircraft (over and above the current same day airborne regulations which I feel have worked quite well for the most part) with respect to sheep hunting – something that I feel would eventually spill over to all species, all modes of access that give hunters advantage need to first be included in that discussion, not just aircraft. I think a guide concession plan on state land is the best over all solution to the real problem.

Proposal 208 - I came to the following conclusion from reading the Sheep Survey & listening to the ADG&G Findings:

Statewide effort = 80% Resident / 20 % NR

Statewide harvest = 60% R / 40% NR

About 25% of NR effort is 2Nd degree kindred

Conclusion = For every 10 people on the mountain hunting sheep, 8 are residents, .5 are NR 2ND degree kindred, 1.5 are guided NR

Additionally:

50% of harvest occurs during 1st 10 days

50% of that occurs during 1st 5 days

Overcrowding is a major resident complaint and contributes to low success and poor hunt quality.

ADF&G is not saying this is a conservation issue.

The most dissatisfied hunters seem to be resident hunters who use air transporters.

My Take - I think most or at least a lot of the problem can be alleviated simply by spreading out the pressure a bit during the busiest times. The devil is always in the details, but I feel my proposal below would be fairly easy to implement, and that it would go a long way towards alleviating overcrowding and improving hunt quality and success, without going to drawing permits. Also, it still provides reasonable opportunity – it allows at least 32 days per year for all sheep hunters.

My Proposal/Solution: R & NR sheep seasons and bag limits = Aug. 10th to Sept. 20th, except that hunters with last names starting with A-M can only hunt August 10th – 19th on odd # years, and hunters with last names starting N-Z can only hunt Aug. 10th – 19th on even # years (all hunters can hunt Aug 20th – Sept. 20th every year).

Other Options:

If the Board feels that the above measures aren't enough, then also restrict harvest to 1 ram every 2-4 years for R and double that length for NR

Further Explanation:

If we split the alphabet in half, it might not be at M & N, but it should be easy to determine by dividing the total # of sheep hunters in half to see where in the alphabet that falls.

It should be easy to enforce and implement. Everyone already needs a hunting license. It should be easy for AWT to determine if someone is hunting legally or illegally during the first 10 days just by looking at their name on the license.



Submitted By
Dan Montgomery
Submitted On
1/30/2015 4:43:07 PM
Affiliation
A.P.H.A. and Mat Valley A/C

Proposal 108: Support. I wrote this proposal and I think it is vitally important for the board to keep the guide- client contract requirement and not let it expire on June 30th of this year. The board does have the authority to make this permit condition and without it non-residents will be able to apply for a guide required species. Without already having a guide-client contract in place a lot of these permits go unused when these hunters can't find a guide they can afford. By having a guide-client contract in place these non-resident hunters are aware of the cost of a hunt with their outfitter before they are drawn for a permit. The unique verification code that is in place and being issued by the Department of Commerce, Community and Regional Affairs to qualified guides is all that ADF&G needs for proof that a guide is registered for the area where the hunt will take place. These permits are very limited in number and for even one to go unused has a big impact on a guides income for that season. I strongly urge the Board to re-instate this requirement.

Proposal 207; Oppose. This proposal would unnecessarily restricts aircraft during sheep season. In most places aircraft is the only way to access sheep country. They are already restricted from hunting the same day airbourne and this regulation has worked very well and that is all I believe is necessary.



Submitted By
Karen Gordon
Submitted On
1/30/2015 4:56:39 PM
Affiliation
None

The views I express here are my own views as a private individual and do not necessarily represent the views of the Wild Sheep Foundation. While I am a Director of the Wild Sheep Foundation, I have not been authorized to speak or write on behalf of the Foundation on this issue...

To Chairman Spraker, Members of the Board of Game:

I am extremely interested in and concerned about the management of Dall sheep in Alaska, and as such I appreciate the opportunity to comment on agenda items related to Dall Sheep proposals in the upcoming Board of Game meeting in February 2015.

My recommendations are as follows:

Recommendation # 1

The Board of Game Should VOTE DOWN All Proposals That Decrease Hunter Opportunity Including BGP 208

These proposals are contrary to the Constitutional requirement for maximum use, maximum benefit, and common use. Not only does no conservation concern exist, we have been presented with a contrived crisis and unfounded accusations by a few vocal residents motivated by resentment to pointedly discriminate against nonresidents, the very people who essentially fund wildlife management in Alaska. The proposal advocates say nonresidents are taking all the rams, especially the big ones, and causing a crowding issue to the detriment of resident hunters. Joe Want thoroughly analyzed the sheep harvest data which clearly show these allegations are not based on facts. These nonresident-bashing proposals are unnecessarily discriminatory and have no support scientifically. Please VOTE THEM DOWN, especially 208.

NOTE: When the Board of Game considers writing a Board-generated proposal in the future, I'd ask that it mind the criteria the Board itself created for writing such a document.

NOTE: While money is not a factor in the current questions about Dall sheep management, it may be helpful to note that resident sheep hunters contribute \$150,000 to the Fish and Game fund annually through license sales. And if one adds the recent Governor's tag sale at the Wild Sheep Foundation Convention in Reno into the equation, nonresidents contribute a surprising \$1.6 million from license and tag sales which translates into 91% of contributions to the Fish and Game fund from sheep hunters.

Recommendation #2

The Department Should Review and Rewrite The Sheep Management Plans Without The Involvement Of A Working Group

Wiser stewardship would prevail if the Department would undertake a review and redrafting of the Dall sheep management plans before addressing any future allocation-altering proposals. Current sheep management plans are 38 years old and severely out of date. Some Department biologists aren't even aware of their existence, and as such, the plans have become operationally irrelevant versus what they should be – the guiding documents directing sheep management in Alaska. Moreover, because these comprehensive plans were created



pre-ANILCA, they are no longer germane in some mountain ranges where the creation of federal conservation units reduced statewide huntable sheep population by about 30%, a significant reduction in hunting opportunity.

Rewriting the Dall sheep management plans should be the first priority of the Department, and the Board should not proceed with any sheep allocation efforts until the new management plans are in effect. In addition, involvement of a working group in any capacity until the Department releases draft management plans to the Board or for public comment would appear as if special interests were dividing up the pie amongst themselves.

The appropriate authors of the management plan rewrite are the biologists and managers of the Department for three reasons:

1. They have the Constitutional mandate to execute wildlife management which is not given to a working group.
2. Department staff is uniquely qualified to write management plans by virtue of their biological education, scientific expertise, and experience/knowledge operating under the Constitution and state statutes. A working group simply fails to bring to these qualifications to the table.
3. Moreover, it would be inappropriate for a working group of special self-interests to author management plans which would allocate state resources. This is a clear conflict of interest. When authoring something as serious as management plans, it is mandatory to keep the process transparent and above reproach. This cannot be done by using a working group until the documents are released to the Board for their input.

Following these recommendations will keep the process within statutes and will yield a more transparent process resulting in a foundation of sound Constitutional and science-based management.

Recommendation #3

Educate Sheep Hunters About Harvest Statistics and Management Objectives

Many of the beliefs of sheep hunters as evidenced in the recent Hunter Feelings survey are not actually factual as borne out by the Department's own sheep harvest data. Had these hunters been educated with the facts about resident versus nonresident harvest rates, hunter effort versus success, size of sheep taken, etc., they would have at least had information with which to make educated choices in the survey which would have likely resulted in an entirely different set of outcomes. This is yet another reason why the survey should not be depended upon for any management action. Educating hunters that different areas are managed for different objectives, be they be for trophies, maximum opportunity, or aesthetic experiences, will increase understanding about where to go to achieve the hunt type they desire. I believe some of the complaints about crowding and not having an aesthetic hunting experience in 20A are due to unawareness that this area is actually managed for maximum hunting opportunity. If it is an aesthetic experience they are looking for, then they need to know where those areas are. The Department should send a link to the recently released harvest summary to each sheep hunter along with information about the management objectives so hunters make wise decisions about where to hunt to maximize the type of experience they desire. This will result in fewer complaints and proposals before the Board of Game to solve a perceived problem that is based on a lack of information.

Recommendation #4

Please Pass Proposal #107

And finally, in support of robust scientific management, I request the Board pass Proposal 107. Units 13D and 14A were put into an "any ram" harvest regime several years ago contrary to the accepted science and significant testimony against this action before the Board of Game that full curl management is healthier overall for any sheep population over the longer term. The "any ram" scheme has not been proven to be successful. It is time to return to the most productive harvest regime – full curl. This proposal by the Anchorage AC is timely and needed.



Thank you for the opportunity to comment as a private citizen.

Sincerely,

Karen Gordon

Fairbanks

The views I express here are my own views as a private individual and do not necessarily represent the views of the Wild Sheep Foundation. While I am a Director of the Wild Sheep Foundation, I have not been authorized to speak or write on behalf of the Foundation on this issue...



Submitted By
Luke Boles
Submitted On
1/30/2015 4:57:19 PM
Affiliation

Phone
907-452-5533
Email
lukeboles@yahoo.com
Address
1302 Summit Dr
Fairbanks, Alaska 99712

Dear Alaska Board of Game:

I do not envy your task at hand, you've been tasked with a tough job. I presume that serving on the board can seem thankless, but remember: there are many of us Alaskans the appreciate and value the job you are doing. Thanks for your service to Alaskans.

I am a sheep hunter and all of my comments are on the proposed changes to the sheep hunting regulations.

I believe strongly that the "regular" Alaskan sheep hunter should be the primary consideration in making/changing any regulations. What is a "regular" Alaskan sheep hunter? An Alaskan resident who is willing to tough out a walk-in/out sheep (not rich enough to have an airplane or pay thousands of dollars to get flown in).

Proposals 109-112 & 114-117: SUPPORT. I strongly believe that the sheep tags (both draw and general harvest) should be managed such that the non-residents get 10% of the harvest annually, as many proposals suggest. Proposal 208 option #1 for non-residents could be a management strategy for this.

If you are not going to manage the average annual non-resident sheep harvest to 10%, I believe the price for a non resident sheep tags should be increased to be in line with what other states charge for non-resident sheep tags. In addition non-residents should have to pay more to participate in the draw lottery for sheep tags.

Generally I'm not in favor of having an earlier opening for residents. However, if you are not going to limit the non-resident annual harvest to 10%, then an early resident opening is an acceptable 2nd choice.

I am in favor of eliminating the 2nd degree of kindred requirement for non-residents.

I'm also in favor of raising the draw lottery fees for residents up to \$20.

Please consider limiting the easily accessible draw hunt areas (TMA and DCU, among others) to resident hunters only. These areas give the "regular" Alaskan hunters a great chance at a trophy ram without flying in.

I am in favor of charging up to \$50 for general season sheep tags for residents.

Proposal 207: SUPPORT. I am in favor of limiting the use of aircraft in sheep hunting.

Proposal 208 Non-resident Option #1: SUPPORT. This could be a management strategy for implementing Proposals 109-112 & 114-117 limiting the non-resident harvest to 10% annually.

Proposal 208 Residents option #5: OPPOSE. This could break up long time sheep hunting partners due to their last names falling into the different hunt periods.

Proposal 208 option #'s 1-3. OPPOSE. Although if you are going to limit a portion of the entire season to draw I prefer it's kept as short as possible. Option 4 is the best of the bunch, but it seems like it would be complicated to manage.

Thanks for considering my comments.

Luke Boles
Fairbanks



Submitted By
Becky Schwanke
Submitted On
1/30/2015 8:25:40 PM
Affiliation
Tuff Kids Outdoors

1/29/2014

Dear Chairman Spraker and members of the Board of Game,

Please accept the following comments for wildlife proposals currently up for discussion. I am a lifelong Alaskan, I hunt, I trap, and reside in the Copper River Basin.

Proposal 60 – I do not support this proposal as written, or the Unit 13 antlerless hunt as currently implemented. Without additional Board direction, this hunt can never be more than a token hunt, showing that a small antlerless take is possible and keeping a cow hunt on the books. This hunt has been opposed by some advisory committees due to unrealistic concerns. Ten permits is safe, but it does not maximize the available harvest of cows in this area. One cow was taken in 2014 from an area with nearly 4,000 moose. I would like to see **Proposal 198**, submitted by the Copper Basin Advisory Committee adopted. Proposal 198 provides clear direction of when the antlerless hunt would be offered, and how many cows should be harvested. It also provides guidance on establishing zones to spread hunters out. The AC provided a clear hunt outline that is logical, will put more moose in freezers, and should go a long way to garnering future support for this hunt opportunity.

Proposal 61 – I support changing the Unit 13 non-resident moose drawing permits to registration. The participation has been extremely low and a drawing is unnecessary. If there is reasonable resistance to this change, consider two possible amendments, 1) cap the registration permits at the most recent number of drawing permits issued, or 2) push back the non-resident moose registration hunt to begin September 5th (instead of September 1st).

Proposal 65 – The Community Subsistence Harvest (CSH) hunt in the Copper River basin has become a monster. It is nothing of which it was intended. If it is continued, I support this proposal to align the CSH moose hunt with the general season moose hunts across the hunt area. The hunt still retains the 100 any-bull quota, and hunters can still use a designated hunter; two significant benefits above and beyond the general hunt, more than qualifying it to be a reasonable subsistence hunt opportunity. Additionally, CSH hunters can hunt during December if they are unsuccessful during the fall season. The 3-week early season in Unit 13 has created a draw so strong, it's overwhelming. The conflict between user groups is growing each year, and moose in accessible hunt areas are dwindling. Align the seasons; it's the best option at this time.

Proposal 68 – If it is continued, I support changing the definition of a CSH group to "25 or more households". This better represents a community concept, and would help considerably in assuring certain individuals cannot unethically seek out non-hunting group members just to reach a low minimum.

Proposal 77 – I do not support establishing firm any-bull moose quotas for each subunit or individual hunt area. This proposal suggests that by setting firm individual area quotas, it would "reduce the potential for harvest in heavily used areas". This proposal does no such thing. If the quotas are the same year to year, and the early opener remains, the sheer number of CSH hunters will continue to harvest a significant number of moose in accessible "heavily used areas" during the first few days of the season. It's like the rush to buy fresh produce on delivery day. All this proposal does is allow CSH hunters to exceed the overall cap of any-bulls currently in regulation, 100.

Proposal 78 – I do not support requiring more rapid harvest reporting for the CSH moose hunt. It's currently 24 hours. The same hunters that choose not to report in 24 hours will also ignore a shorter reporting requirement. Until there's consequences, there's no need to tighten this further.

Proposal 79 – I do not support requiring the department to open/close the CSH moose hunt on certain days specifically to reduce harvest. Hunters must be able to plan ahead, and shouldn't be restricted from hunting on holidays or weekends, especially during a subsistence hunt. Shorten the CSH moose hunt and this won't be necessary.

Proposal 82 – I do not support a firm quota for the CSH caribou hunt. The CSH caribou hunters must be treated the same as other state subsistence (RC566) hunters. The only way to assure everyone has ample hunting opportunity, and that all available caribou are taken annually (especially in the case of high caribou numbers), is to close all state seasons on the same date.

Proposal 88 – I do not support allowing Unit 13 Nelchina Caribou subsistence hunters to hunt moose outside Unit 13. Mr. Manning so eloquently described in his proposal exactly why this is a bad idea. If adopted, the applications for Unit 13 Tier I RC566 Nelchina Caribou permits will jump to 10,000-15,000. Caribou seasons could end up being unreasonably short, and the hunts could fall apart.

Proposal 93 – I support expanding the take of brown bears over bait across Unit 13, though not in Unit 11 at this time. The first brown bear hunt over bait just occurred in 13D, and the take was relatively high along the road system. It was expected that the take over bait would be the highest the first year, and drop off to some moderate and sustainable level after 3-4 years. Since black bear bait stations are already spread across the landscape, some brown bears already visit existing bait stations. Hunters, especially those hunting with new or young hunters must always be vigilant at their bait stations to assure they don't have a run in with a brown bear. By allowing brown bears to



be legally harvested over these baits, this safety issue disappears. Brown bears are currently plentiful, and hunted under a 12 1 bear / year season in Unit 13. This type of harvest regime is liberal compared to other areas, though it has yet to result in significantly lower brown bear numbers, and annual brown bear harvests have remained stable. There are many remote and unhunted areas in Unit 13, and some additional harvest over bait will likely have no effect on the overall population.

For now, the NPS has made it clear they are willing to nullify any such regulations on Preserve lands through their new Proposed Rule language as they obviously are uncomfortable with baiting brown bears. If the state takes it slow, and can show brown bear baiting is sustainable over time, perhaps at some point it will become a more accepted method of take, even by the NPS.

Proposal 198 – See Proposal 60 comments. Given the continued concern over antlerless moose hunts, it would be helpful if the Board would adopt a more detailed structure under which the hunts could be offered. The current regulation allows for 200 permits to be issued for all of Unit 13. This would likely be sustainable, but a couple AC's would vote against it. So only 10 permit are issued for one small area. It would be a more digestible hunt overall, I believe, if there were triggers as the AC suggests. Only hold the hunt in areas where the population objective midpoint is reached (the new objectives proposed by the AC), and limit the harvest to 1% of the total estimated number of cows in the area. By adding zones, you also assure the public is spread out, and not harvesting all the cows near trail heads. The Board must provide the department with further direction on this hunt, otherwise it will remain a token cow hunt indefinitely. There are cows to be harvested, let's put them in freezers.

Proposal 199 – I fully support the new language offered by the Copper Basin Advisory Committee amending the Unit 13 Intensive Management program. The current suspension language is original and antiquated, stating that suspension can occur “when prey population and harvest objectives are reliably attained”. First, the moose population objectives in Unit 13 should be adjusted, so they're reasonably attainable period (after 12 years, we're very close to where we need to be if not there already). Secondly, the term “harvest objective” needs to be removed because harvest can fluctuate due to annual weather/access conditions and new harvest regulations; these are variable and should not be tied to suspension of IM. Trying to attain both every year is unreasonable and gives the department little leeway to suspend the program in the face of public requests/concerns. Additionally, it would be far more reasonable to allow the department to manage the IM program on a subunit basis in this area, focusing IM efforts where needed instead of unitwide every year.

Most importantly, steady continuous wolf control can not the best strategy for maintaining naturally functioning predator/prey systems. Holding wolves at a steady low density can likely result in altered prey movements and habitat usage, furthering their susceptibility to being preyed upon when wolves are eventually allowed to increase. By allowing moose population growth to a moderately high level (within nutritional bounds), it should be beneficial to the ecosystem to allow for a rest period for a year or two, letting wolves naturally increase. Should the moose population dip below the mid-point objective, issue IM permits and allow the public IM program to proceed. This would also serve to reduce the financial and time burden on the public IM participants over having IM year in and year out with low wolf numbers.

Finally, should the wolf population be reduced significantly over the course of a single winter, and there is some concern that the population has fallen below the minimum allowed in regulation, conventional trappers should be exempt from suspension/season closure. The time and effort put into establishing successful wolf lines can be significant, and their take is relatively low compared to IM. Asking trappers to pull their lines mid-winter can put a tremendous time and financial burden on individuals, especially when their expected take will have virtually no effect on the overall wolf population.

Proposal 200 – I fully support this well thought out proposal by the Copper Basin Advisory Committee to amend the Unit 13 moose population and harvest objectives. After 12 years of IM in Unit 13, the moose population growth has slowed in some areas, but has room to grow in others (until nutritional data shows otherwise). This proposal looks at each subunit, and addresses each area separately from a logical unbiased perspective (note, the 13C population objective was already reduced). 13D is a traditionally low density area with chronically low calf recruitment due to high numbers of black and brown bears. Slightly higher population objectives in this area are reasonable, putting the current population estimate in the middle. 13E is a large area, difficult for IM participants to affect, especially given winter caribou use of the area. Still, this area can likely sustain more moose as their nutritional status appears adequate (calf weights and twinning).

The harvest objective ranges suggested by the AC are also much more reasonable, given known access and harvest success in each area. Unfortunately, unrealistically high harvest objective ranges don't make more moose. As long as this population has surplus bulls, above 25 bulls:100 cows, the Board and the department can continue to work constructively towards maximizing sustainable harvest of bulls. If surplus moose aren't being taken in a given year due to weather, access, or other hunt issues, falling short of harvest objectives, this should not play a role in whether or not IM occurs that year.

This proposal, in conjunction with **Proposal 199** provides a strong reasonable framework for moving forward with moose IM in Unit 13. I would like to see these recommendations adopted and worked into a long-term operational plan for the area for the benefit of all and the long-term viability of the predator/prey population.

Proposal 207 – I fully support the proposed aircraft restrictions pertaining to sheep hunting. The use of aircraft is a significant advantage over those of us hunting without it. Aircraft overhead is very discouraging when in the field pursuing sheep, and if there's a small reduction in its use, I believe it will go a long way to reduce hunter frustration.

Proposal 208 – I do not support any statewide drawing for sheep hunting. It's completely unnecessary. Adopting a blanket fix is not the answer. Setting permit numbers for unnecessary draws will put the department in a bad position, and the long-term consequences for this type of change could be high. I believe the general season opener will always result in crowding, no matter when it occurs. I support keeping it early in August when the weather is less than ideal (for many hunters and hunt areas). Each area is unique and should be managed as such, with specific reference to any possible effects that changes will have on surrounding hunt areas. Why put the southern



Alaska Range in 13B, 13C, and 13E into 3 separate drawings for any portion of August when there's no current problems with resident or nonresident hunters? Why put Unit 11 into a drawing for August when there's two very distinct hunt areas, north and south, with very different issues? Southern Unit 11 has a stable to increasing sheep population, and guiding is limited due to NPS concessions. There is no sheep hunting problem in this area. If it's not broken...

I would like to see a more focused survey effort to address individual areas, and the hunters most familiar with those areas. Through that type of process, I believe we (sheep hunters as a whole) could come up a comprehensive plan to improve sheep hunting opportunities for everyone. In the face of reduced sheep numbers, there will continue to be conflict. Climatic changes are occurring, and the long-term effects on sheep are unknown. I would like to see the Board take this slow and make deliberate decisions, in an attempt to keep regulations simple and reasonable.

Thank-you for your time and consideration,

Becky Schwanke



Submitted By
Barbara Johnson
Submitted On
1/30/2015 2:31:42 PM
Affiliation

Phone
907-229-6891
Email
sbejohn1@mac.com
Address
P.O. Box 670874
Chugiak, Alaska 99567

To: Alaska Boards of Fisheries and Game

Re: Proposal 105-5 AAC 95,505. Palmer Hay Flats State Game Refuge

I am writing you to ask that Proposal 105, which would expand the Palmer Hay Flats State Game Refuge, be approved. I urge that both boards also send a recommendation to the State Legislature for action this year to ensure that the Alaska Department of Fish & Game can manage these additional lands consistent with refuge goals. These lands, purchased over the past 20 years for incorporation into the Palmer Hay Flats State Game Refuge, need to be given the legal protection under the law. I think it is very important to amend the legal descriptions in AS 16.20.032 so that the refuge boundaries are expanded and include these additional lands.

As I understand it, these parcels have all been transferred to the state and they have conservation covenants on them. It seems logical and necessary to officially include them in the boundaries of the refuge to enable managers to communicate consistent management goals to the public more clearly. I think it would be very helpful to have new maps that make it easier for the public to also know the new boundaries and to allow the Alaska Department of Fish and Game to put up signs and manage these lands appropriately with the other lands already designated as part of the refuge.

I appreciate your consideration of this proposal, and I hope that you will take positive action this year to make these lands officially part of the refuge, as intended when they were purchased and given to the state through a variety of methods.



BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



www.alaskabackcountryhunters.org

Comments to the Alaska Board of Game Central/Southwest Region February 13-20, 2015

Support: Proposal 111 & Proposal 207

Dear Board members,

Thank you for the opportunity to comment and for your service to all Alaskans in the realm of wildlife management and hunting and trapping regulations.

Proposal #111 (Support)

Alaska Backcountry Hunters & Anglers (AK BHA) has Proposal #111 before you that was deferred from the Region III meeting last winter. ADFG has provided updated harvest data in their A&Rs, including this Table below:

Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts.

Unit/Area	Average annual hunter numbers	Percent resident hunters	Average annual harvest	Percent harvested by residents	Resident success rate	Non-resident success rate
All Region III	1,254	70%	503	50%	29%	62%
Unit 12	288	76%	106	55%	27%	63%
Unit 19C	136	47%	72	29%	33%	64%
Unit 20A	226	64%	90	38%	24%	67%
Remainder Unit 20	39	93%	9	90%	22%	28%
Unit 25A	131	59%	71	49%	45%	65%
Unit 25C	52	95%	9	92%	17%	12%
Units 26B & 26C	287	76%	115	60%	32%	59%
Remainder Reg. III	96	77%	31	61%	26%	52%



When the Board deferred our proposal (#44) at the Region III meeting last February, the rationale was that more information was needed in order for the Board to make an informed decision. The Board requested that a scientific survey be done to gauge sheep hunter opinions, and the opinions of guides and transporters/air taxis on sheep issues. Dr. Todd Brinkman from UAF was hired to conduct the survey, which is now complete.

The results of that survey don't really tell us anything we didn't already assume in our proposal as far as the impacts of unlimited nonresident guided hunters and unlimited guides in parts of Region III.

We have always recognized that we don't have problems in all areas of Region III. But the Board of Game informed us that subunit by subunit fixes were not preferred because those fixes can lead to spreading the problems elsewhere. Hence our proposal to limit nonresident sheep hunters in all of Region III.

The basis of our proposal is fairly simple. The state of Alaska mandates that all nonresident sheep hunters (except those hunting with a 2nd degree of kindred resident family member) must hire a licensed big game guide. At the same time, the Board of Game allows unlimited nonresident sheep hunting opportunity in many areas of Region III, and the state of Alaska places no limits on the number of licensed big game guides that can operate in any Guide Use Area.

Those facts should lead any wildlife manager or Board of Game member to question the outcomes of such a system, especially considering the high cost and lucrative nature of a guided Dall sheep hunt. It was the guide industry itself that said that unlimited guiding and unlimited nonresident sheep hunting opportunity has led to overharvests and some areas going to draw only for all. A prime example is what happened in subunits 13D and 14A.

The Board well knows of these problems. The "glitch" it would seem is that neither guides nor the Board of Game are willing to support limiting nonresident sheep hunter opportunity via a draw-only system in Region III, because of the negative consequences this has to guide businesses and reducing funding to the Division of Wildlife Conservation. These are valid concerns and AK BHA has always looked at this issue with a comprehensive approach. That is why we have been advocating for hunting license/tag fee increase bill in the legislature since 2008. If we could come up with any



other way to limit nonresident sheep hunters that didn't harm guide businesses, we would. But we see no other way at this time to do that, considering that the Board-supported solution of a Guide Concession Program is effectively dead in the water.

We want to make it abundantly clear to the Board and members of the public that our proposal is not in any way "anti-guide" or "anti-nonresident." This is unfortunately how many have chosen to interpret it in the public arena. AK BHA fully supports the guide industry and we want nonresident sheep hunters to be able to continue to hunt Dall sheep in Alaska.

But the known problems our proposal seeks to address need to be fixed. We firmly believe that at this time we should limit nonresident sheep hunters only. Start there as a first step. A sunset provision could be included if the Board wants to review this issue after further study. We do **not** support any limits on resident sheep hunters in Region III.

Proposal 207 (Support)

AK BHA has long supported changes to our same-day-airborne (SDA) regulations that would prevent some of the ethical abuses and quality-of hunt issues going on with spotting sheep, and with landing late in the evening in order to take a sheep early the next morning. We have received numerous complaints from our membership on this issue.

We fully support changes to the SDA regulations to ban spotting of sheep during the hunting season and to make a longer period of time between when a hunter can access the backcountry via aircraft and legally take a sheep.

Thank you again for the opportunity to comment,

Alaska chapter Backcountry Hunters & Anglers
info@alaskabackcountryhunters.org