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OPINION: Alaska's nonsensical Dall sheep management decisions

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At the upcoming March 17-22 Southcentral Region Board of Game meeting in Soldotna, the board will vote on a board-generated proposal to close all sheep hunting for five years in Unit 19C in the western Alaska Range, based on conservation concerns for the declining sheep population.

This comes after decades of allowing unlimited nonresident sheep hunting opportunity in the area and numerous proposals from the public and the organization I represent, Resident Hunters of Alaska, or RHAK — all voted down by the board — asking for limits on nonresident sheep hunters based on conservation concerns for the declining sheep population and worries that resident sheep hunting opportunity would be restricted or closed if unlimited nonresident sheep hunting was allowed to continue.

The Board of Game manages the Dall sheep population in Unit 19C by allowing unlimited resident and nonresident sheep hunting opportunity, with the understanding that most all nonresident sheep hunters are required by law to hire a licensed big game guide. A guided Dall sheep hunt runs upwards of \$25,000, and in Unit 19C, where unlimited nonresident sheep hunting is allowed, there are also no limits on guides. You don't have to be a wildlife manager to guess where that might lead. In Unit 19C, it's led to nonresident guided sheep hunters consistently taking nearly 70% of the total harvest annually, with that number increasing as the sheep population further declined — last year, nonresident guided sheep hunters in Unit 19C took 90% of the total sheep harvest!

The Alaska Department of Fish and Game says the reason it's OK, sustainability-wise, to allow unlimited Dall sheep hunting on limited and declining Dall sheep populations, is because the full-curl harvest management strategy — only full-curl rams or rams 8 years or older can be harvested — is biologically sustainable under all conditions. Dall rams with full-curl horns or those 8 years or older are known to be near the end of their life cycle, thus the selective harvest of mature rams is more compensatory mortality than additive mortality. The data also shows that not all the legal rams are harvested out of a population every year, thus there is always a "harvestable surplus" of legal rams, even if that number of legal rams is very low.

The Board of Game has continued to justify the allowance of unlimited nonresident sheep hunting in Unit 19C based on the department's position that the FC harvest strategy is indeed sustainable. Everything else — the known conflicts in the field between guides, their clients and resident sheep hunters, guides essentially locking up areas, guide-on-guide conflicts and the vast majority of the annual sheep harvest continually going to nonresident guided hunters — is justified on the basis that nonresident dollars from hunting license and tag sales are needed to help fund the department and that guides need to make a living.

In late 2022, RHAK submitted an emergency proposal, called an Agenda Change Request, or ACR, again highlighting known conservation concerns for the sheep population in Unit 19C, and again asking the

board to limit nonresident sheep hunters in the unit to conserve the declining sheep population and ensure that resident sheep hunting opportunity could continue.

ACRs are a mechanism for anyone from the public to submit a proposal to the Board of Game that if accepted would be heard the next year out of the normal regulatory cycle. This year, 2023, the board takes up proposals for hunting and trapping regulatory changes in Region I, Southeast, and Region II, Southcentral.

The only way to propose changes to other regions in 2023 is by submitting an ACR to the board, or by the board submitting its own board-generated proposal. The board hears ACR proposals in November of every year and there are five criteria for accepting an ACR. At least one of the five criteria must be met for acceptance out of cycle: 1. To correct an error in regulation; 2. To correct an effect of a regulation that was unforeseen when a regulation was adopted; 3. To identify a biological concern for the population or a threat to meeting objectives of the population; 4. To identify an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in AS 16.05.258(f); and 5. To identify an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome because the resource would be unavailable in the future.

RHAK's ACR 12 proposal identified known sheep conservation concerns under criterion No. 3, and the closure of the winter subsistence sheep hunt by the department, based on biological concerns for the sheep population, in regulatory year 2020 under criterion No. 4.

All seven members of the board, now composed of five licensed guides and one retired guide, voted against RHAK's ACR 12, the stated rationale being that there were no sheep conservation concerns and thus it did not meet the criteria for acceptance.

And here's the kicker: Shortly after that vote, one of the board members introduced a board-generated proposal to completely shut down Unit 19C to all sheep hunting for five years based on conservation concerns for the sheep population, and it passed by a 6-1 vote! Apparently, six board members were unaware of their overt hypocrisy.

It was clearly evident that the board did not follow its own policies as to ACR acceptance by voting down RHAK's ACR 12, but we had no recourse to challenge the decision.

The guide industry has strongly opposed any limits on its nonresident sheep-hunting clients in Unit 19C, but some guides, recognizing how drastic sheep declines are in the area, have been pushing the board to institute a complete closure for everyone. The guides look at a complete closure as a highly preferable option over limits on their nonresident clients, because any limits imposed now would likely stay on the books forever. A complete closure, though, has the benefit that when — or if — sheep hunting opens again, the same unlimited nonresident sheep hunting opportunity is still in place.

The Board of Game was happy to oblige commercial hunting interests by manipulating the public ACR process to ensure that the only option that comes before the public at the upcoming Soldotna meeting is their board-generated proposal, Proposal 204, for a complete sheep hunting closure in Unit 19C for all.

The fix appears to be in. Either the board will shut down sheep hunting in 19C for everyone, after allowing nonresidents to take 90% of the harvest, or it will continue to do nothing to limit nonresident sheep hunters.

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