

# **ALASKA DALL SHEEP DISCUSSION RESULTS**

## **DALL SHEEP UNIT 19C OCTOBER 2024 PLANNING TEAM WORKSHOP (IN-PERSON AND ZOOM PARTICIPATION), ANCHORAGE, ALASKA**



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Workshop Dates: Thursday and Friday October 17<sup>th</sup> - 18<sup>th</sup>, 2024

Location: Anchorage, Alaska, USA.

Results report prepared by Dr. Alistair Bath on behalf of the workshop participants.

Bath, A.J. 2024. Results from an Applied Human Dimensions Facilitated Workshop Discussion regarding Alaska Dall Sheep in Unit 19C: Workshop held in October 2024. 44pp.

## **DALL SHEEP UNIT 19C DISCUSSION WORKSHOP RESULTS**

### ***Introduction:***

The Unit 19C Sheep Working Group came together in October 2024 to continue its work focused on understanding and addressing the key issues facing Dall Sheep management in Unit 19C in Alaska, and to specifically make recommendations in-time for the upcoming Board of Game meetings. The working group is made up of Jerry Burnett, past chair of the group who participated via zoom, Stosh Hoffman, current Chair of the sheep working group and member of the Board of Game, Jake Fletcher, also a Board of Game member, Scott Crowther, Brett Gibbons, Mike Litzen, Michelle Quillin, Chait Borade (who was unable to attend), and Patricia Owen. This team worked together for one and a half days with the focus of the workshop being to continue to understand and address the key issues facing Dall Sheep and their management in Unit 19C in Alaska. This October workshop was designed to finish the work which began in June 2024, to listen to new ecological information about Dall sheep from Alaska Fish and Game, and to finalize recommendations to the Board of Game in-time to be considered for their upcoming meeting.

Alaska Fish and Game has initiated an innovative visual process of facilitation by an independent facilitator based on effectively listening and involving the diverse group of interests, who make up the Sheep Working Group, brought together to create recommendations for Unit 19C. A similar process of facilitation was used successfully to develop the original Lower Innoko-Yukon River Alaska Wood Bison Management Plan, the first release of wood bison into the wild in Alaska, and recommendations regarding wood bison restoration. And the visual style of facilitation continues to be used with revisions to that wood bison restoration plan and in other areas of the State considering wood bison restoration. Creation of management plans and past revisions to update the wood bison restoration plans are built on consensus and positive working relationships between all individuals who make up the wood bison restoration planning teams. And although there are diverse viewpoints, much common ground can be identified when exploring issues using the visual style of facilitation.

The Sheep Working Group of 8 individuals, who were available, met for two days on Thursday and Friday, October 17<sup>th</sup> and 18<sup>th</sup>, 2024 in Anchorage, Alaska. In addition to the individuals making up the Sheep Working Group, oral public testimony was heard from three individuals. Several Alaska Fish and Game staff were in the room for support if requested upon by the Sheep Working Group. Members of the public were able to be on-line or in the room to listen to the discussions. The workshop was recorded with the exception of break-out smaller group discussions. When the smaller groups presented their ideas back to the larger group, recording was once again in progress. This report summarizes the results from those two days of discussion.

The workshop was facilitated by Dr. Alistair Bath from Bath and Associates (<https://www.bathandassociates.ca>), a Human Dimensions Consulting Firm from Newfoundland and Labrador, Canada using an applied human dimensions facilitated workshop approach (AHDFWA), a visual technique that encourages productive and efficient discussion amongst all

workshop participants, and a technique modified by Dr. Alistair Bath. Bath and Associates has worldwide experience working with groups on bison (e.g., Germany, Romania, Yukon, Canada and Alaska, United States), protected areas (Romania, Italy, Armenia/Turkey/Georgia border areas, and various national parks within Canada, Yellowstone National Park in the United States), urban biodiversity issues (Jerusalem, Israel), and many other wildlife issues including wolves, brown bears, and wolverine issues throughout Europe, tigers in India, and jaguars in Brazil. All of these conservation issues has required active facilitation and conflict resolution techniques between diverse interests to reach consensus on management plans and strategies. Over 30 years, Dr. Alistair Bath has facilitated groups using this applied human dimensions facilitated workshop approach (AHDFWA) toward consensus on management plans regarding wolves, bears, bison, capercaillie, forestry plans and protected areas strategies worldwide. The process has worked bringing Israelis and Palestinian Authorities together on urban biodiversity issues in and around Jerusalem and has proven its effectiveness multiple times in various countries with diverse groups who often start very opposed to each other, but gain a mutual respect for each others views and consensus on common wildlife management plans. Each part of the facilitated process is used to help build trust between all organizations and individuals in the room, explore the key issues, a common vision, obstacles to achieving that vision which become objectives and specific actions. During the facilitated workshop, participants work constructively to various components of a management plan or strategy. This approach was implemented for two days to further explore Dall sheep management issues in Unit 19C.

For fruitful dialogue, workshop participants are seated in a semi-circle able to see each other facing a group of boards that capture the nature of the discussion. First Nations and Indigenous groups have often used a full circle to inspire constructive discussion. Ideas are presented on cards and shapes of different colors which are portrayed on the boards for all individuals to see. Ideas at the front of the room are then discussed rather than challenges toward individuals saying them occurring, thus minimizing conflict within the room but encouraging productive discussion and the direction of constantly working toward solutions. To encourage all participants to discuss issues, smaller groups are often used to explore topics in more depth and gain consensus in smaller groups before sharing ideas back to the larger team. After working in smaller groups, the entire team is brought back together to share ideas and gain consensus within the larger forum. The results of the workshop are presented as images (i.e., sheets) in this document. The images appear exactly as the discussion occurred in the room. One strength of the AHDFWA is that there is no interpretation of the minutes, but simply the presentation of the items as discussed by participants in the form of these photographs of the discussion sheets. This report guides those willing to understand the nature of our workshop through these work sheets.

The workshop begins with introductions of all participants and the learning of everyone's name by the facilitator (see Sheet 1); learning names is a first step of respect and building trust. Usually a question is posed to participants to encourage them to say something about their

Sheet 1: List of Participants at the October Workshop

NAME	WHERE FROM?	FAVORITE DESSERT <small>SOMETHING INTERESTING YOU HAVE DONE RECENTLY</small>
1. JASON CAIKOSKI	FAIRBANKS, AK, USA	CARROT CAKE w/ WALNUTS
2. Josh Peirce	McGrath, AK	Blueberry pie
3. Mike Ebinger	McGrath, AK	Mørse burt ag Choc. cake
4. Michelle Quillin	Hughes, AK	Blueberry soup / <small>Traveled to Norway</small>
5. Pat Owen	Denali Park, AK	Cherry pie / <small>traveled w/ two old grandson</small>
6. Ryan Scott	Juneau	Pizza
7. Stosh Hoffman	Bethel	Any
8. Rob Jones	Anch	NOT SURE
9. J. Fletcher	Talkeetna	
10. Scott Crossman	Anch	
11. Michelle Heun	Palmer / Talkeetna	cherry cobbler
12. PETE Imhof	Chugiak AK	
13. Caroline Brown	Fbx	chocolate cake w/ cr. cheese icing <small>ran a half marathon</small>
14. DARREN BRUNING	Delta Junction, AK	chocolate pudding pie
15. Brett Gibbens	McGRATH	None Delight
16. MIKE LITCHEN	GUDE	Cherry Tart

①

interests, what's been keeping them busy, a favorite activity in leisure time, or to tell an interesting story. As this was the second meeting with the group and the facilitator, the ice-breaker question was about participant's favorite dessert. Approximately 24 people were in the room and shared their favorite desserts with cobbler being quite popular (see sheet 1 and top right hand corner of sheet 2). Sheet 2 and 3 highlight the proposed agenda for the two-day workshop.

The Sheep Working Group is focused on bringing recommendations to the Board of Game. The chairman of the sheep working group, Stosh Hoffman, welcomed the group and the public to the meeting. The agenda included highlights from the June workshop, written public testimony from Aaron Bloomquist, Scott Collins, Robert Fithian and Lucas Hickie (see Appendix 1), and oral public testimony by Robert Fithian, Pete Imhoff and Mark Richards (see Appendix 2). Alaska Fish and Game ecologists then offered information regarding research completed, ongoing and planned regarding Dall sheep, as they meticulously addressed the many research questions generated by the sheep working group from the last workshop. This was followed by a question and answer session. Other items on the agenda included objectives identified from the last workshop such as how to make decisions under uncertainty, alternatives to full cull management, discussions of harvest allocation, and the role, if any, of predator control. On the second day, Stosh Hoffman and Jake Fletcher, Board of Game members, removed themselves from all discussions focused on the sheep proposals that had been submitted to the Board of Game, and discussion arising about the sheep working group's specific recommendations to the Board. The last part of the workshop focused on action items and next steps (see Sheet 3).

### ***Highlights of the June workshop:***

Dr. Alistair Bath, on behalf of the Dall sheep working group, highlighted the results of the June workshop which were written up in a report shortly after the June workshop (see sheets 4 and 5). The sheep working group have clear reasons why they needed to meet including concern over declining sheep numbers, a wish to involve all cultures and traditions in meaningful dialogue toward solutions, and the need to understand what we know and don't know about sheep. In addition, the group shares a common vision for Dall sheep in Unit 19C. Group members highlighted the need to ensure the resource is considered first, build effective relationships based on trust between agencies, governments and all user groups, and strive to maintain the opportunity to continue hunting Dall sheep sustainably.

The sheep working group identified 11 objectives to achieve their common vision including identifying data gaps and key research questions, minimize road and aircraft noise in areas of sheep habitat, ensure flexible adaptive management, increase connection from all segments of society to the resource, increase trust between all groups and minimize hunter-user conflicts. And finally, the group committed to making clear recommendations to the Board of Game.

Sheet 2: Workshop Agenda

The image shows a workshop agenda board with several sticky notes and handwritten notes. The notes are arranged in a roughly circular or grid-like pattern. The main agenda items are on yellow sticky notes, while some details and names are on blue oval-shaped notes. A red circle with the number '2' is drawn on the board. In the top right corner, there is a handwritten list of names in red ink.

**UNIT 19C**  
DALL SHEEP WORKING  
GROUP WORKSHOP  
OCT. 17-18, 2024

**FACILITATOR**  
DR. ALISTAIR BATH  
alistair@bathandassociates.ca  
+1-709-730-7445

**WELCOME AND INTRODUCTIONS**

**PUBLIC TESTIMONY**  
• MARK RICHARDS  
• PETE IMHOFF  
• ROBERT FITHIAN

**REVIEW OF AGENDA**  
→ PLAN OF ATTACK FOR NEXT TWO DAYS.

**UPDATE ON DALL SHEEP SCIENCE**  
→ WHAT WE KNOW AND DON'T KNOW? → NEED?

**JUNE WORKSHOP HIGHLIGHTS AND DIRECTION FOR TODAY**

**Q & A?**  
→ KEY ISSUES OF CONCERN?

**ANY ISSUES ARISING?**  
→ WE ARE HERE AS PLANNED TO CONTINUE DISCUSSIONS!

**HOW DO WE MAKE DECISIONS AND RECOMMENDATIONS UNDER UNCERTAINTY?**

**WHAT SHOULD BE OUR GUIDING PRINCIPLES?**

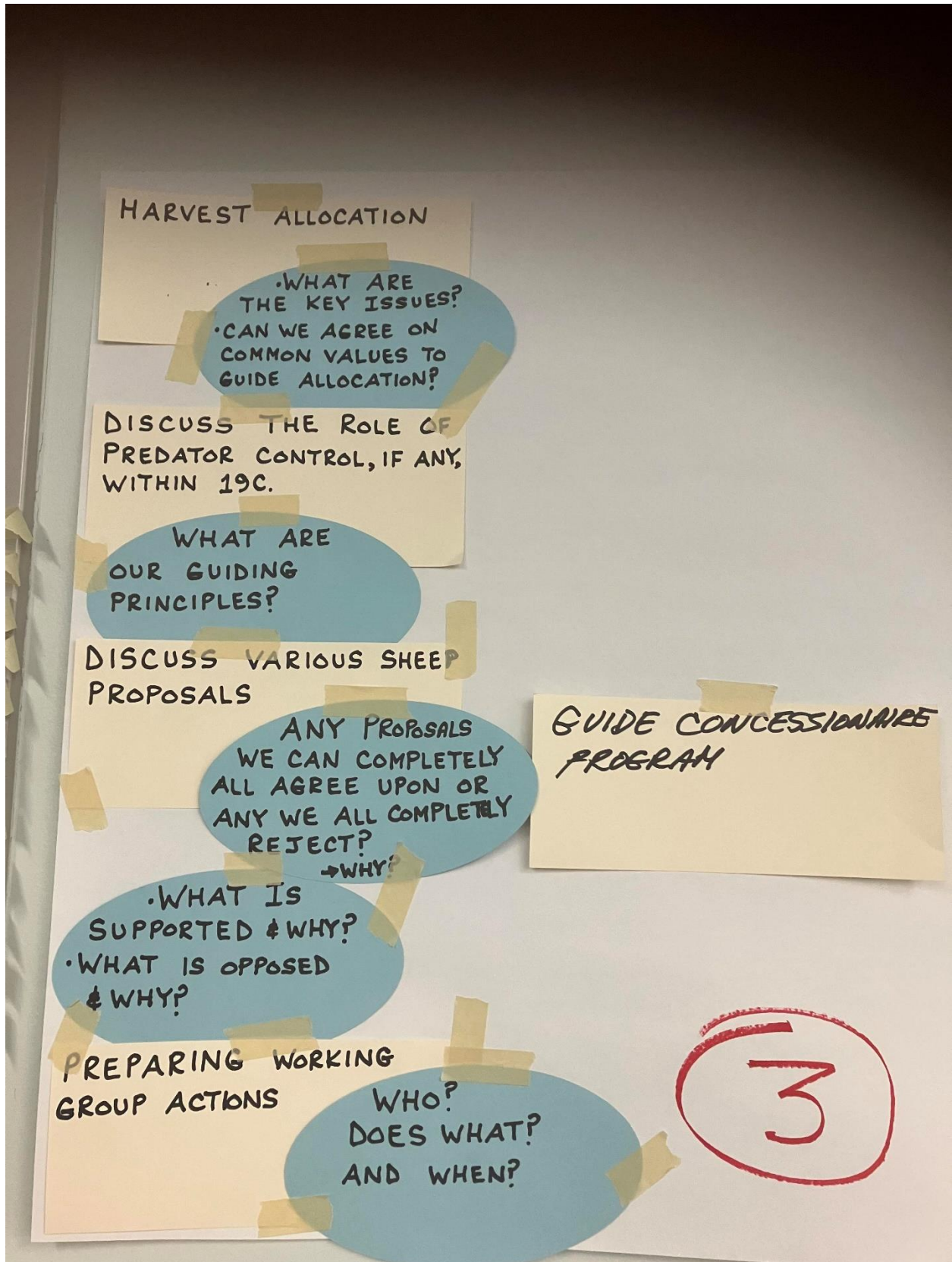
**PUBLIC TESTIMONY**  
• AARON BLOOMQUIST  
• SCOTT COLLINS  
• ROBERT FITHIAN  
• LUCAS HICKLE  
→ WRITTEN SUBMISSIONS PLUS +?

**FULL CURL MANAGEMENT?**  
→ INDICATORS TO TRIGGER CHANGES  
→ HOW DO WE SUPPORT OUR DECISION?

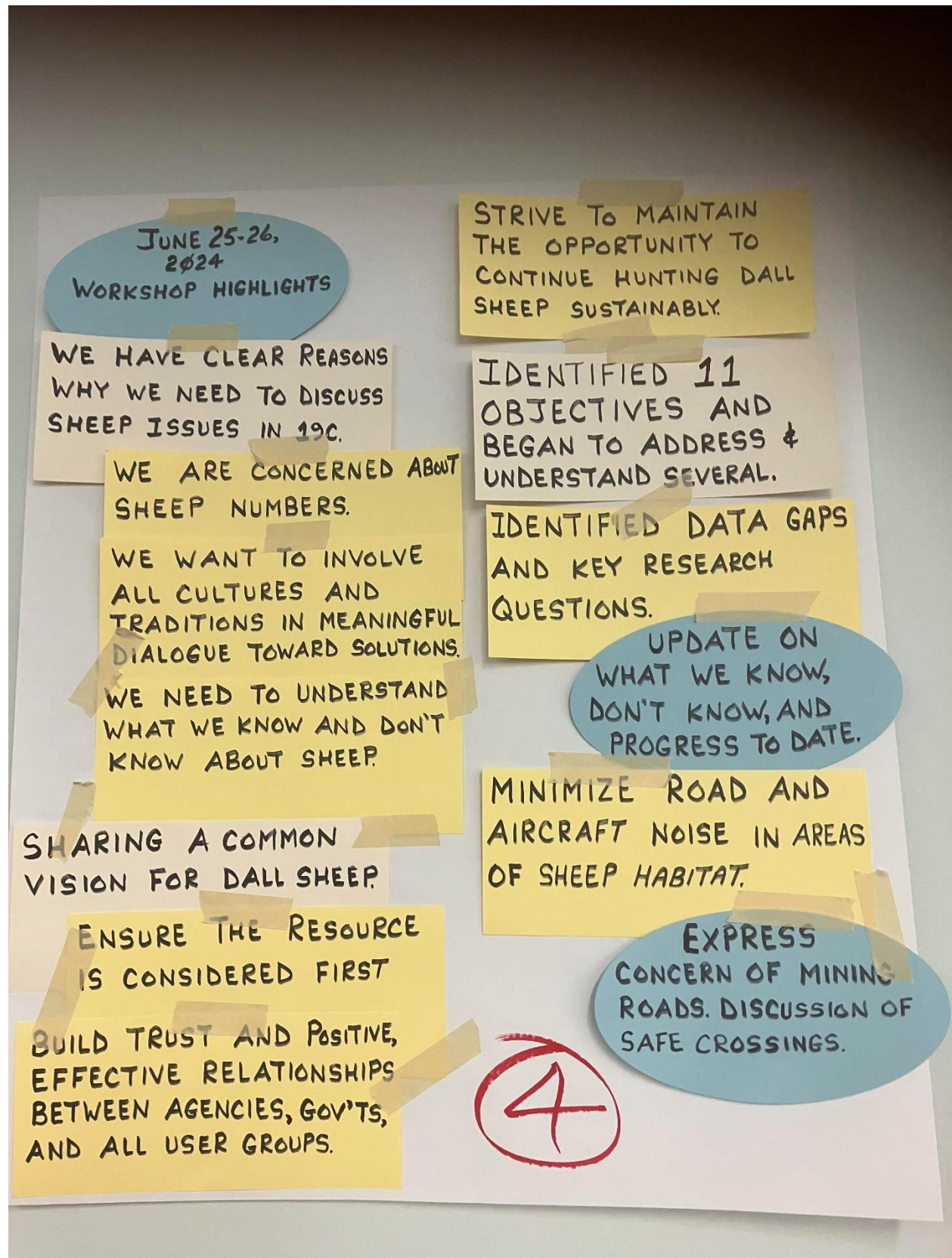
**2**

*Kristy  
Cheryl  
George  
Lynla  
Sam  
Jerry Burnett  
Natalie  
Mark Richards*

Sheet 3: Workshop agenda continued

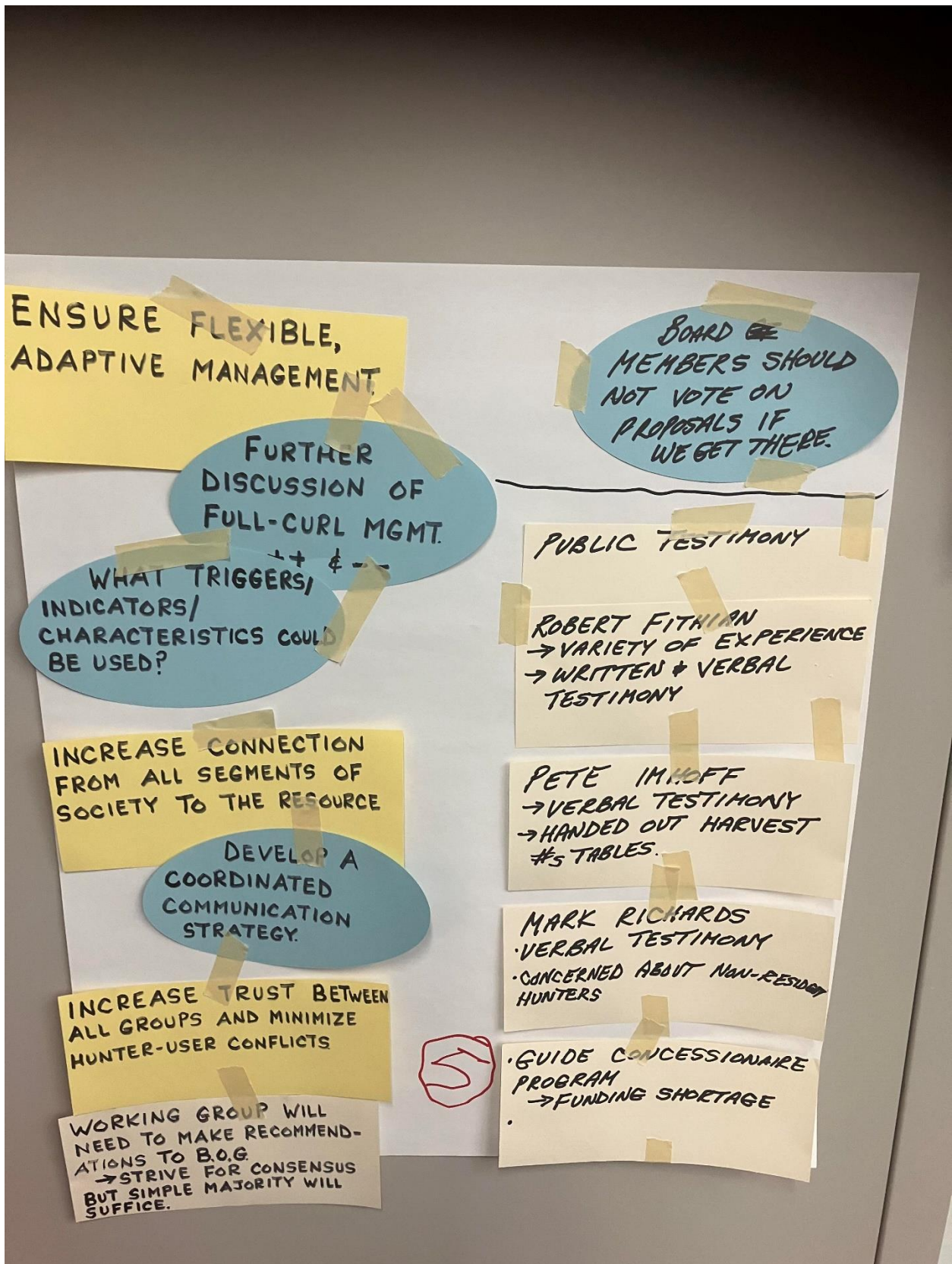


Sheet 4: Highlights from the June workshop





Sheet 5: Highlights of the June workshop continued



However, before tackling these issues, the group heard public testimony from Robert Fithian, Pete Imhoff and Mark Richards; their comments were recorded into the workshop proceedings. Written testimony was also provided by Aaron Bloomquist, Scott Collins, Robert Fithian and Lucas Hickle. Once again, see Appendices 1 and 2 for documentation of these testimonies.

### ***Learning about Dall Sheep – Information from Alaska Fish and Game ecologists:***

Several Alaska Fish and Game staff were present in the room to provide information (e.g., Mike Ebinger, Jason Caikoski, Josh Peirce, Ryan Scott, Darren Bruning, etc.). A thorough and well-explained presentation was offered by Mike Ebinger (see 2 posters and sheet 6). His presentation is available on the Fish and Game website as well as in hard copies that were distributed to everyone present. The first component of his presentation was an overview of hunter effort and harvest data by resident and non-resident hunters. Resident and non-residents were fairly even in hunter opportunities, however non-resident success was much higher than resident success. Harvest though did decrease for both groups in the past few years. Mike illustrated the sheep harvest chronology for 19C; approximately 50% of the animals are harvested within the first 10 days of the season. Age of harvested sheep was slightly changing as illustrated in Mike Ebinger's graphs. Only a small percentage (less than 2%) is attributed to the youth harvest.

The second part of the presentation focused on an overview of the survey data. Mike Ebinger highlighted that the survey data generated a minimum count and more often ratios per 100 ewes are used. He suggested the trends in the numbers in Unit 19C are comparable to what has been seen in other areas with Dall sheep.

In the June workshop, sheep working group members asked for information about numbers of predators in Unit 19C. No population estimates exist for bears nor wolves in Unit 19C. In addition, no estimates exist for carrying capacity for sheep in 19C, although Mike Ebinger highlighted it appears that there is habitat room for more sheep. There are really no clear weather and climate studies being done in Unit 19C, however, changes in weather temperature and freeze-thaw events are extremely important for the survivability of sheep.

The sheep working group also asked about stressors such as air traffic and other human activities on sheep. Mike Ebinger believed that Unit 19C was minimally disturbed for most of the year (see sheet 7). Jason Caikoski, an ecologist for Alaska Fish and Game, added additional thoughts regarding the research questions posed by the sheep working group. No studies specifically have focused on hunted vs non-hunted sheep populations, but with limited data from some new research underway, Jason cautiously suggested that sheep populations seem to fluctuate roughly the same. No research has been done in Alaska regarding the impact of genetics on productivity; data focused on bighorn sheep from British Columbia is inconclusive whether there is an effect or not. No research has also been done on the effects of young vs older rams in terms of productivity or their importance in the overall health of the sheep population.

# Research Presentation Poster focused on Unit 19C Sheep Hunter Effort and Harvest Data



## 19C Sheep Hunter Effort and Harvest Data

### Overview

The sheep harvest and hunter effort data presented here reflect a longer time frame, i.e., Historical Trends, and a more recent decade where both resident and nonresident opportunity was present (2013-2022). The 2023 harvest is not shown and totalled 5 sheep harvested during a season with no nonresident or youth opportunity. 2024 data are not yet available at the time of this meeting, and 10 legal rams have been reported thus far in the 2024 season. All data are preliminary and subject to change.

### Historical Trends

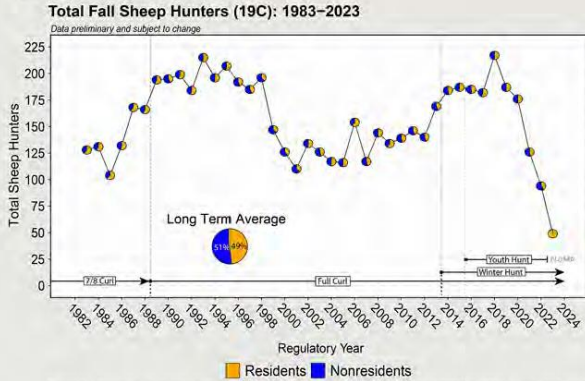


Figure 1. Total annual sheep hunters during the fall general season (GS000) from RY83 to RY23. Points and solid lines shows the total number of hunters, with orange and blue regions of each point showing the proportion of resident (orange) and nonresident (blue) hunters each year. The vertical dashed lines show the regulation changes occurring during the period (e.g., Full Curt mgmt., Youth Hunt, Winter Registration Hunt). Note that in RY23 hunting was closed to nonresident hunters. Unknown residency status are not shown but are generally a small number of individuals and typically earlier in the time series. RY24 hunter effort and harvest information was not available at the time of this meeting.

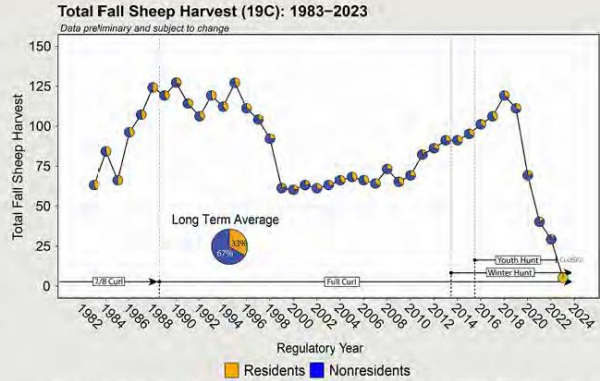


Figure 2. Total annual sheep harvested during the fall general season (GS000) from RY83 to RY23. Points and solid lines shows the total harvest, with orange and blue regions of each point showing the proportion of resident (orange) and nonresident (blue) hunters each year. The vertical dashed lines show the regulation changes occurring during the period (e.g., Full Curt mgmt., Youth Hunt, Winter Registration Hunt). Note that in RY23 hunting was closed to nonresident hunters. Unknown residency status are not shown but are generally a small number of individuals and typically earlier in the time series. RY24 harvest was not complete at the time of this meeting.

### Contemporary Trends (2013-2022)

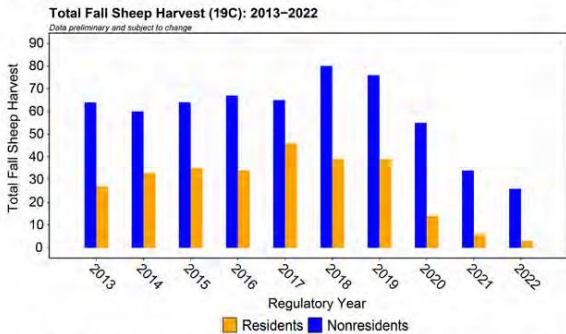


Figure 3. Total annual sheep harvested during the fall general season (GS000) from RY13 to RY22. Color indicates total fall resident (orange) and nonresident (blue) sheep harvested each year.

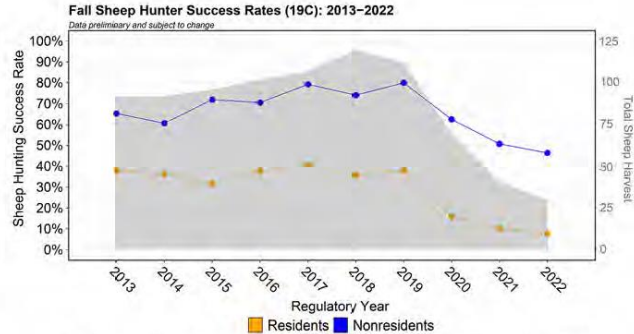


Figure 4. Success rates for the last decade where both resident and nonresident opportunity was present in GMU 19C (RY13 to RY22). Points and solid lines show the success rates for nonresident (blue) and resident (orange) hunters during the fall general season (GS000). The shaded region and right axis show the total sheep harvest for both residents combined.

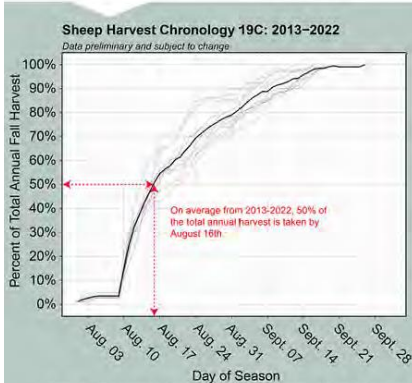


Figure 5. The percent of total harvest by day of season for the last decade where both resident and nonresident opportunity was present in GMU 19C (RY13 to RY22). The solid black line shows the average proportion of total harvest by day of the season and light grey lines show individual years. Dashed red arrows indicate, on average, where 50% of the harvest has occurred (August 16th).

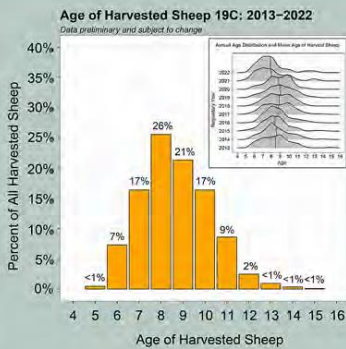


Figure 6. Age of harvested sheep during the fall hunt (GS000) for the last decade where both resident and nonresident opportunity was present in GMU 19C (RY13 to RY22). Orange bars show the proportion of each age in the total harvest over the 10-year period. The inset shows the smoothed annual density of ages for each regulatory year and the mean age (solid vertical bars).

Table 1. Youth and Winter Registration Hunt (RS380) from 2013-2024 in GMU 19C. Reported harvest and proportion of the total annual harvest.

Regulatory Year	Youth Harvest		RS380 (Winter Registration Hunt)	
	Reported Harvest	% of Total Harvest	Reported Harvest	% of Total Harvest
2013	No Opportunity		No Opportunity	
2014	No Opportunity		2	2.15%
2015	No Opportunity		4	4.04%
2016	3	2.97%	0	0.00%
2017	5	4.50%	5	4.50%
2018	6	5.04%	0	0.00%
2019	3	2.81%	4	3.48%
2020	2	2.90%	Closed	
2021	1	2.50%	0	0%
2022	0	0.00%	0	0%
2023	Closed		0	0%
2024	Closed		-	-
Average	2.86	2.93%	1.67	1.57%

Produced by Alaska Department of Fish and Game, McGrath Area Office, October 2024. For questions or comments related to data presented on this poster contact Josh Pearce (Area Biologist) or Mike Ebinger (Assistant Area Biologist) at 907-524-3323.

# Research Presentation Poster focused on Unit 19C Sheep Survey Data



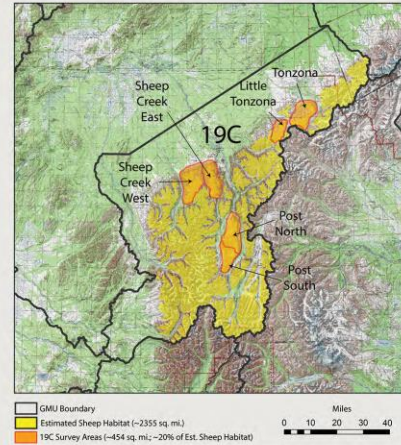
## 19C Sheep Survey Data

### Overview

The sheep survey data presented here reflect surveys across multiple ADF&G offices within Region 3 from (2010-2024). The focus is on GMU 19C and other sheep populations are included to provide a regional comparison of sheep populations in the Alaska Range. Timeseries of lambs/100 ewe-like sheep provide a proxy for lamb production, but do not incorporate annual lamb survival and recruitment into the adult age class. Accordingly, changes of the ewe-like cohort over time serve as the best proxy for recruitment of lambs into the adult population. All data are preliminary and subject to change.

Table 1. Cumulative 19C Aerial Survey Data

	2010	2013	2014	2015	2016	2017	2019	2023	2024
Approx. Area (mi <sup>2</sup> )	453	453	453	453	453	453	453	453	453
Total Rams	348	268	374	301	255	343	202	98	101
Legal Rams	56	60	55	46	53	60	33	13	16
Sublegal Rams	292	208	319	255	202	283	169	85	89
"Ewes"	864	490	639	499	593	697	390	242	247
Lambs	287	94	168	167	195	266	178	73	120
Lambs:100 "Ewes"	33	19	26	33	33	38	46	30	49
Rams:100 "Ewes"	40	55	59	60	43	49	52	40	41
Legal Rams:100 "Ewes"	6	12	9	9	9	9	8	5	7
Sublegal Rams:100 "Ewes"	34	42	50	51	34	41	43	35	36
% Lambs	19	11	14	17	19	20	23	18	25
% Rams	23	31	32	31	24	26	26	24	21
% Legal Rams	4	7	5	5	5	5	4	3	3
% Sublegal Rams	19	24	27	26	19	22	22	21	19
Total Sheep	1499	852	1181	967	1043	1306	770	413	473



### Regional Comparisons and Cohort Specific Trends

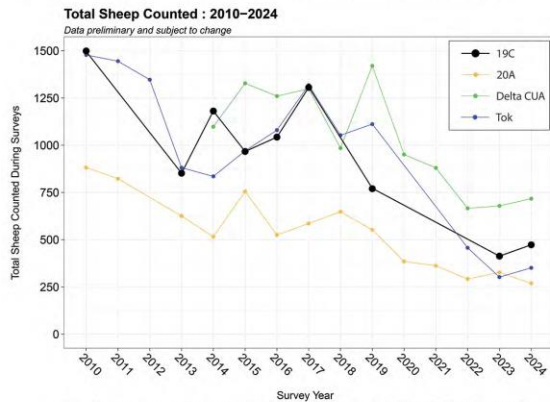


Figure 1. Total sheep counted on sheep trend-composition surveys in Unit 19C, Unit 20A, the Delta Controlled Use Area (CUA), and Tok (2010-2024). Unit 19C sheep are shown in large black points and bold lines and other Alaska Range herds are shown as small points for regional comparison. Line connect consecutive years where surveys were conducted. Some survey years may include incomplete survey coverage due to weather or pilot availability.

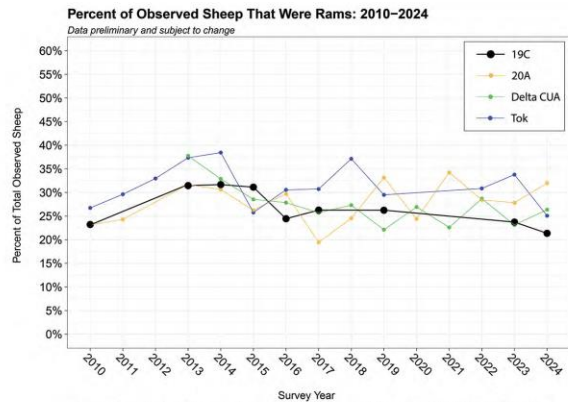


Figure 2. Percent of total sheep counted on sheep trend-composition surveys in Unit 19C, Unit 20A, the Delta Controlled Use Area (CUA), and Tok (2010-2024) that were rams. Unit 19C sheep are shown in large black points and bold lines and other Alaska Range herds are shown as small points for regional comparison. Line connect consecutive years where surveys were conducted. Some survey years may include incomplete survey coverage due to weather or pilot availability.

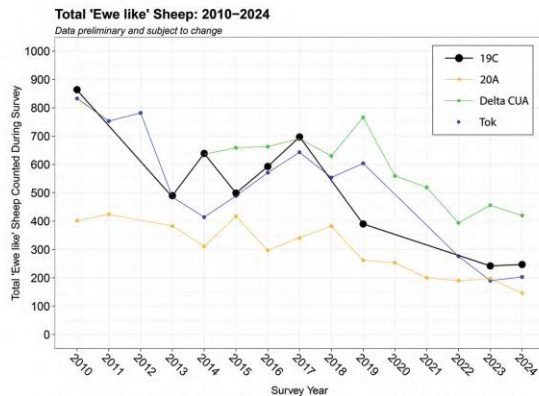


Figure 3. Total "ewe-like" sheep counted on sheep trend-composition surveys in Unit 19C, Unit 20A, the Delta Controlled Use Area (CUA), and Tok (2010-2024). Unit 19C sheep are shown in large black points and bold lines and other Alaska Range herds are shown as small points for regional comparison. Line connect consecutive years where surveys were conducted. Some survey years may include incomplete survey coverage due to weather or pilot availability.

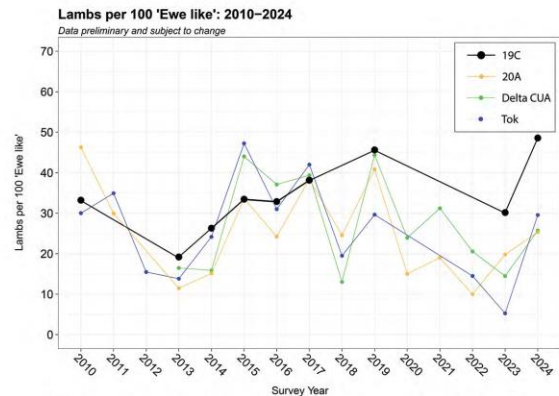


Figure 4. Lambs per 100 "ewe-like" sheep counted on sheep trend-composition surveys in Unit 19C, Unit 20A, the Delta Controlled Use Area (CUA), and Tok (2010-2024). Unit 19C sheep are shown in large black points and bold lines and other Alaska Range herds are shown as small points for regional comparison. Line connect consecutive years where surveys were conducted. Some survey years may include incomplete survey coverage due to weather or pilot availability.

Sheet 6: Highlights from a presentation from Alaska Fish and Game

PRESENTATION AVAILABLE  
ON WEBSITE AND IN  
HARD COPY PACKAGE.

FISH & GAME PRESENTATION  
1. → MIKE, JOSH, JASON  
2. OVERVIEW OF HUNTER  
EFFORT & HARVEST DATA  
→ FAIRLY EVEN NON-RESIDENT  
VS RESIDENT OPPORTUNITIES

NON-RESIDENT SUCCESS  
RATES MUCH HIGHER THAN  
RESIDENT  
→ HARVEST DECREASED  
FOR BOTH GROUPS.

HARVEST BY # DAYS  
OF SEASON  
→ SHEEP HARVEST  
CHRONOLOGY 19C

AGE OF HARVESTED  
SHEEP.

SMALL PERCENTAGE < 2%  
FOR YOUTH HARVEST

2. OVERVIEW OF SURVEY  
DATA  
→ MINIMUM COUNT  
→ RATIOS PER 100 EWES USED.

TRENDS OF #S IN 19C  
COMPARABLE TO OTHER  
AREAS.

3. NO POPULATION ESTIMATES  
EXIST FOR BEARS &  
WOLVES IN 19C.

4. NO ESTIMATES FOR  
CARRYING CAPACITY  
FOR SHEEP IN 19C  
· HABITAT ROOM FOR MORE  
SHEEP.

5. WEATHER / CLIMATE ISSUES  
· CHANGES IN WEATHER  
TEMPERATURE & FREEZE/  
THAW EVENTS IMPORTANT,  
BUT LIMITED DATA FOR 19C

6

6. STRESSORS  
→ AIR TRAFFIC & OTHER HUMAN ACTIVITIES  
• 19C MINIMALLY DISTURBED MOST OF THE YEAR

DETECTION IN SURVEYS QUESTION?  
→ STUDY UNDERWAY  
→ DETECTION IS PRETTY HIGH

JASON - ADDING INFORMATION  
→ HUNTER vs NON-HUNTED SHEEP POPULATIONS  
→ NO STUDIES SPECIFICALLY FOCUSED ON THIS.  
→ SHEEP POPS FLUCTUATE ROUGHLY THE SAME, BUT.....

MISSED 20% OF COLLARS IN 1 SURVEY AT 1 PLACE OF TIME  
→ CAUTIOUS RESULTS.

SOME RESEARCH NOW UNDERWAY.

• RATIO DATA USED  
• PROPORTION MISSED OVER TIME IMPORTANT TO MEASURE - STABLE?

GENETICS - IMPACTS ON PRODUCTIVITY  
• NO RESEARCH DONE IN ALASKA.  
• BC, CANADA → MAY OR MAY NOT HAVE AN EFFECT - BIGHORN SHEEP.

EFFECT OF MISSING GROUPS?  
→ MISSING RANDOMLY NOT AS BIG ISSUE  
→ SAMPLE LARGE AREAS

NO STUDY - EFFECTS OF YOUNG vs OLDER RAMS

METHODOLOGY?  
→ ONE WINDOW - DIFFICULT TO DO AND TRYING TO BE CONSISTENT.

7

CONSISTENCY OF PILOTS?  
→ REALLY FORTUNATE USING LOCAL PILOTS MORE NOW

A member of the sheep working group asked Alaska Fish and Game ecologist Jason Caikoski about detection of sheep when conducting aerial surveys. Jason mentioned that a study was underway, but preliminary results suggest detection is pretty high; approximately 20% of collars were missed in one survey at one place of time, although Jason emphasized the cautious nature of interpretation given these preliminary results. As ratio data is often used, the proportion missed over time is important to measure; a stable pattern is desired. In addition, missing animals randomly is not as big an issue if sampling over large areas, which is typically done. Doing surveys is challenging admitted Jason given a small window of opportunity especially when trying to be consistent. Jason did mention that Alaska Fish and Game had been fortunate with the consistency of pilots and more local pilots lately.

### **Making recommendations under uncertainty:**

Before outlining specific recommendations for the Board of Game to consider, the Unit 19C sheep working group carefully considered what guiding principles should be in place as they make recommendations still under uncertainty (see sheet 8). Working group members wanted to have a conservative management approach, share impacts of any recommendation across all user groups, explore novel approaches, and ensure the long-term sustainability of Unit 19C sheep populations.

### **Exploring a novel approach to Unit 19C sheep management:**

The Unit 19C sheep working group explored issues around full-curl management (see sheet 9) and the possible impacts of closure of the general hunt but still permitting the subsistence hunt (see sheet 10). After several minutes of good discussion, the group agreed upon the wording of a new proposal that will be submitted to the Board of Game from the Unit 19C Sheep Working Group. Some of these ideas for this new proposal emerge from discussions on sheet 11 regarding harvest opportunity, research needs on sheep mortality, comments regarding guiding principles for predator control (see sheet 12 and 13), and issues regarding the guide concessionaire program (see sheet 14). Regarding the latter, if a guide concessionaire program is not in place in time, in April 2026 the sheep working group would like to meet again to discuss and recommend alternatives to its original proposal. The submission to the Board can be found after sheet 14. At the very end of the workshop and this discussion, and very much “out of the blue”, one individual from the sheep working group opposed the recommendation stating that the group had lost its vision of creating a sustainable sheep population; very quickly all other members of the group were visually upset at this comment, and stated that this proposal ensured long-term sustainability, strongly reaffirming the recommendation. The Unit 19C sheep working group minus the two board members, Stosh Hoffman and Jake Fletcher who excused themselves from

Sheet 8: Making recommendations under uncertainty

HOW DO WE MAKE  
RECOMMENDATIONS  
UNDER UNCERTAINTY?  
→ GUIDING PRINCIPLES?

Proceed conservatively as it  
applies to sheep - sheep  
are the priority

Proceed so impacts are  
distributed among user groups

Conservative  
management is  
Adaptable management

Long-term sustain-  
ability Research focused  
on healthy  
populations

Novel Approaches  
Be open to new ideas/  
thinking outside the box

8

Make decisions based on prior  
knowledge + experience of working  
group members (this 19C sheep group)

Put all options (proposal ideas)  
on the table early (now!)  
for the group to consider.



Sheet 9: Discussions regarding full-curl management of sheep

up members (this 19C sheep group)

on the table early Cms for the group to consider.

**FULL-CURL MGMT ALONE IS NOT ADEQUATE.**

⑨

LOTS OF DIFFERENT HUNTS EXIST.

19C ≠ GENERAL SEASON

BIOLOGICALLY, SEEMS TO BE WORKING, BUT ↑ HUNTING, ↑ USER CONFLICT.

DOESN'T TAKE IT ACCOUNT CLIMATE & SOME BIOLOGICAL ASPECTS.

SUSTAINABILITY FOR NON-RESIDENT HUNTING.

CLOSURE FOR A PERIOD OF TIME FOR ALL FOR GREATER GOOD OF SHEEP.

WE COULD/MAY SEE CHANGES IF THIS IS DONE.

LENGTH OF CLOSURE SHOULD BE CONSIDERED.

ONE BOARD CYCLE → INTENT 3 YRS WOULD BE 5 YRS.

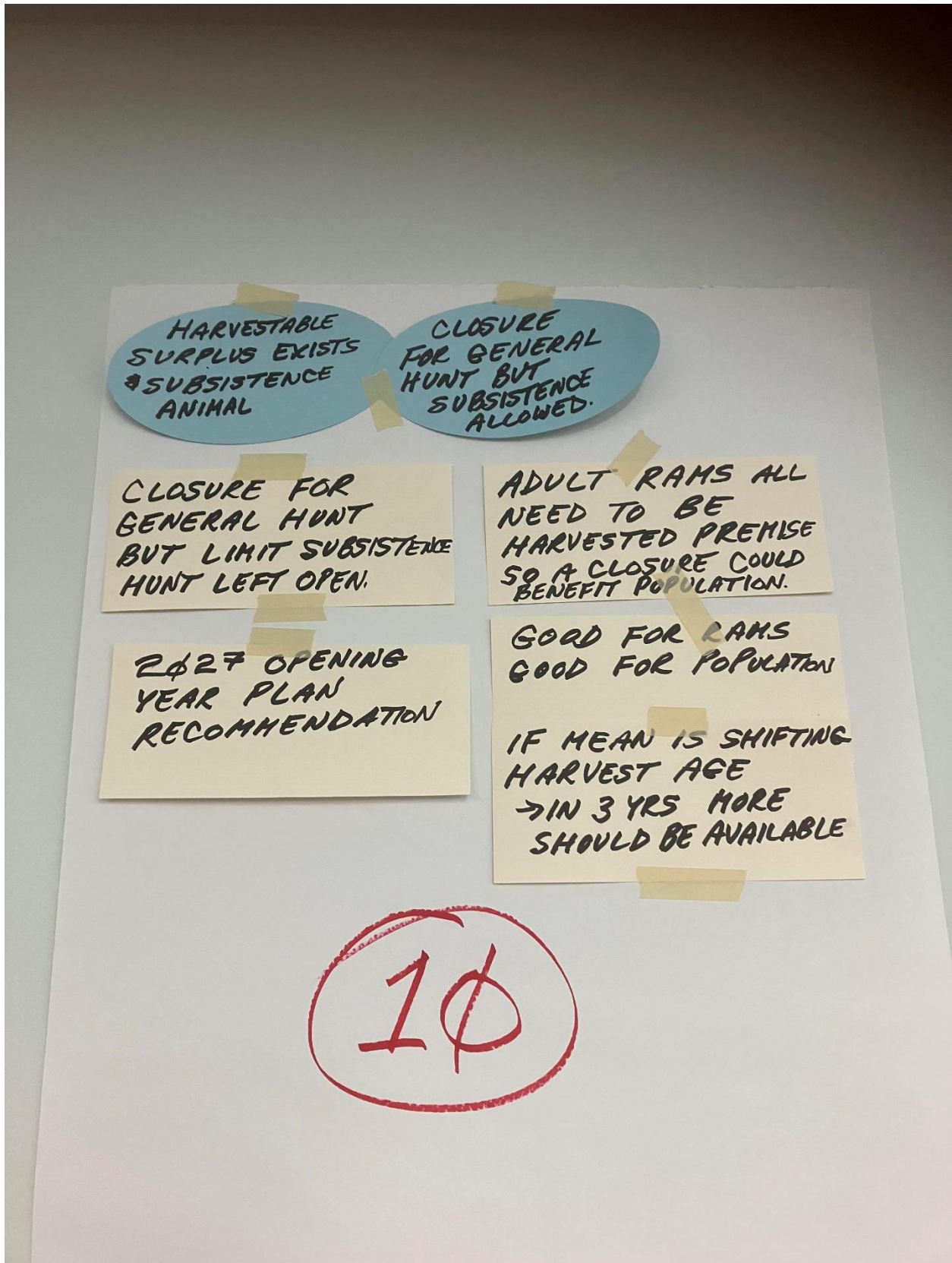
LOSING A COHORT CONCERN

BIOLOGICAL OBJECTIVE ≠ MEASURABLE CHANGE.

CLOSURE MUST BE LINKED WITH PREDATOR CONTROL, ETC.

PREDATOR CONTROL → GUIDING PRINCIPLES

Sheet 10: Beginnings of the formation of the proposal to the Board



• CLOSE TO 2025.  
• DRAWING TEMPORARY  
IN PLACE, FOR 2 YRS.  
→ 80% RESIDENTS, 20%  
NON-RESIDENTS INTERIM.

CAPPED AT 5%  
2DK • SUBSISTENCE  
CONTINUES.

GUIDE CONCESSIONAIRE  
PROGRAM  
→ COULD PROPOSE  
19C FOR PROGRAM  
IN 2028.

• NOVEL APPROACH  
• CONSERVATIVE  
• IMPACTS ALL  
→ STAYS TRUE TO  
PRINCIPLES.

• RESOURCE FIRST  
• SOME HUNTING  
• BUYS TIME.

WHAT  
HAPPENS IF  
GUIDE CONCESSIONAIRE  
PROGRAM DOESN'T  
HAPPEN?

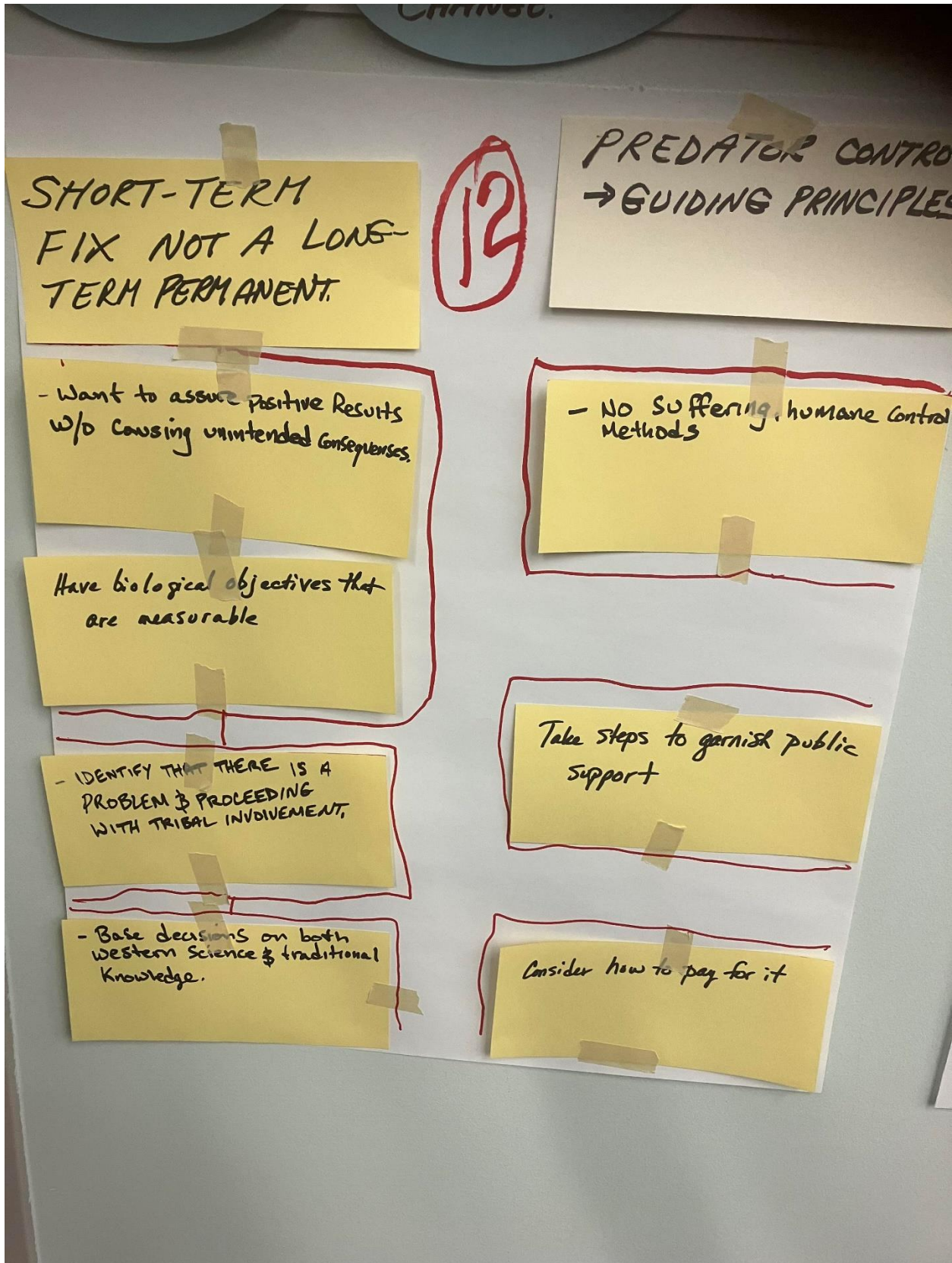
SENT  
FOR  
NOV. 1<sup>ST</sup>  
DEADLINE.

RECOMMEND COLLARS  
ON SHEEP TO BETTER  
UNDERSTAND MORTALITY

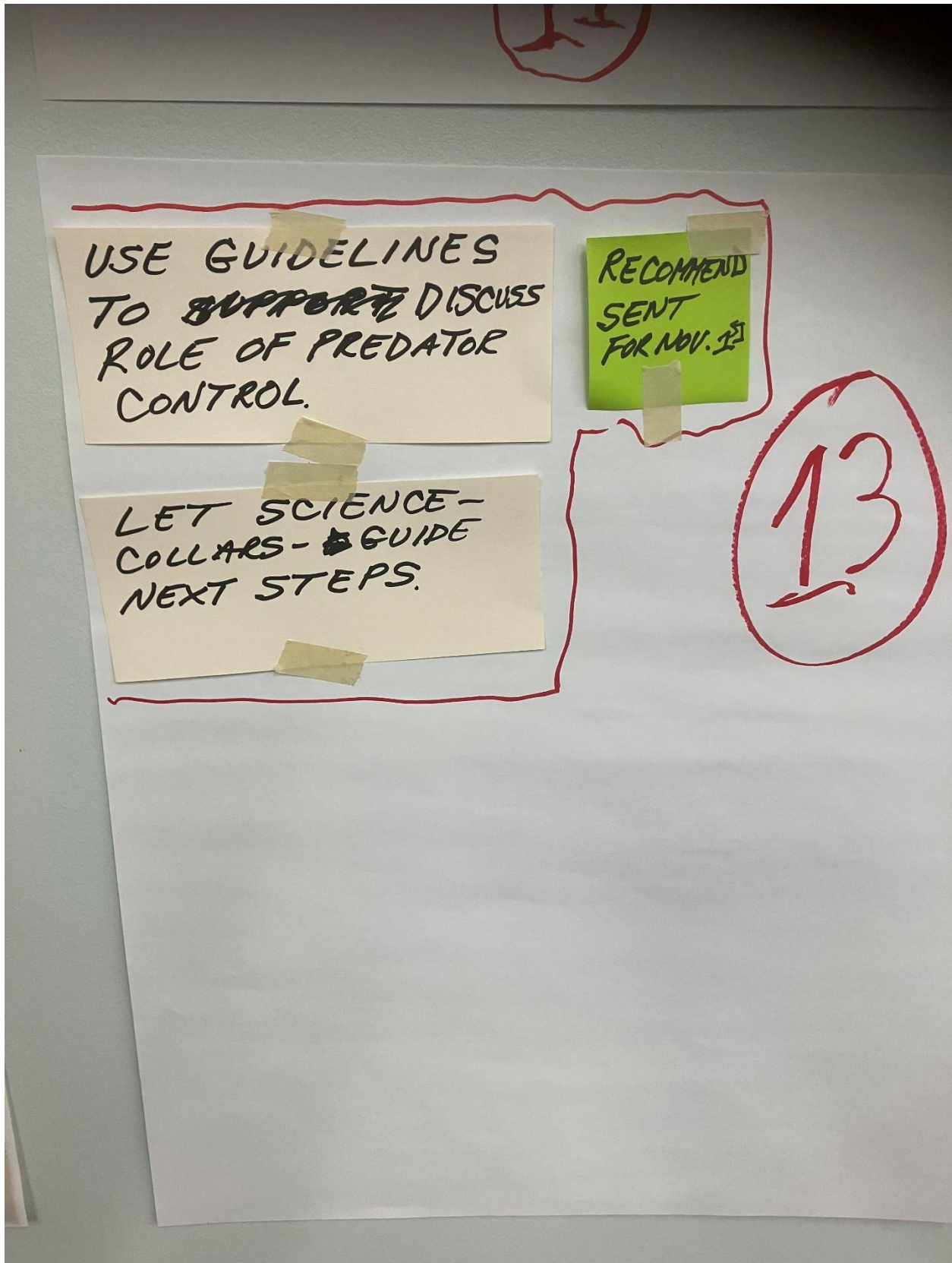
SENT  
FOR  
NOV. 1<sup>ST</sup>

11

Sheet 12: Guidelines to consider before implementing any predator control for sheep



Sheet 13: Position not supporting predator control for sheep at this time



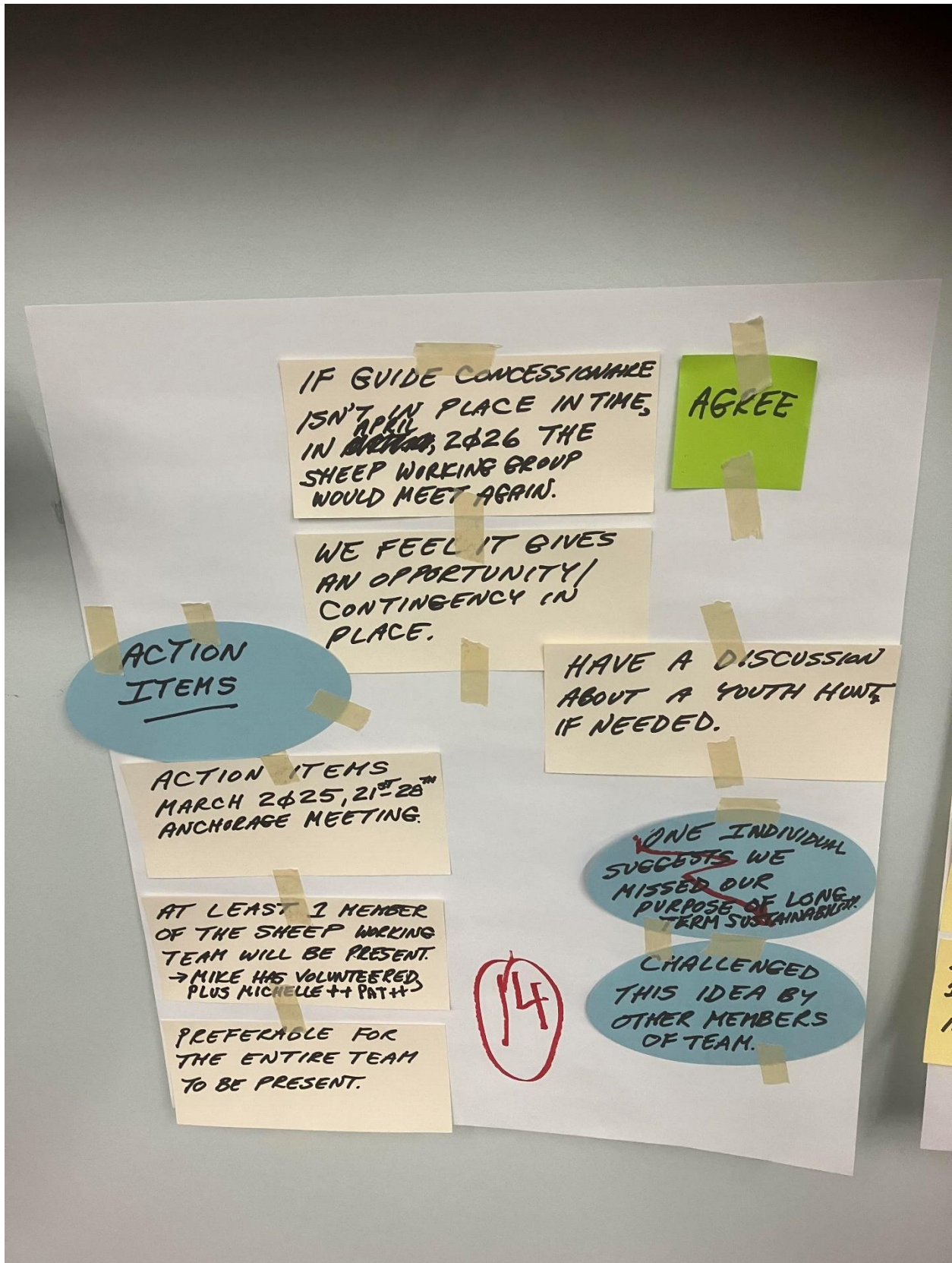
USE GUIDELINES  
TO ~~SUPPORT~~ DISCUSS  
ROLE OF PREDATOR  
CONTROL.

RECOMMEND  
SENT  
FOR NOV. 13

LET SCIENCE-  
COLLARS - ~~BE~~ GUIDE  
NEXT STEPS.

13

Sheet 14: Action items to ensure sheep working group discussions are implemented



**Official submission to the Board of Game from the Unit 19C Sheep Working Group**

**AGENDA CHANGE REQUEST FORM  
ALASKA BOARD OF GAME**

The Board of Game (Board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 92.005. The board will accept these agenda change requests (ACRs) only:

- 1) To correct an error in regulation;
- 2) To correct an effect of a regulation that was unforeseen when the regulation was adopted;
- 3) If the request identifies a biological concern for the population or a threat to meeting objectives for the population;
- 4) If the request identifies an unforeseen, unexpected event or effect that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses, as defined in Alaska Statute 16.05.258(f); or
- 5) If the request identifies 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.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 92.005 (a)(3)].

Please answer all questions to the best of your ability. The information submitted on the ACR form will be used to develop the proposal if accepted by the Board of Game.

<p><b>1) CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.</b> <i>If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW."</i></p>
<p>2) Alaska Administrative Code Number 5 AAC: 85.055</p>
<p><b>3) WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.</b></p> <p>Declining sheep populations in Unit 19C.</p>
<p><b>4) WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the new or amended regulation say?</b></p> <p>We request a closure for 2025 to all general season hunts except the RS380 subsistence hunt. In 2026/27 there will be a temporary draw hunt with a sunset clause after two years where 80% permits are allocated to residents and 20% to nonresidents, with a 5% cap for second</p>

<p>degree kindred (2DK) nonresident hunters, coming out of the nonresident allocation. The 2DK hunt sponsor shall also notch harvest ticket for bag limit.</p> <p>We request Unit 19C be used as the pilot program for the guide concession program, implemented by 2028.</p> <p>In 2028, if the guide concession program for Unit 19C is in place, then residents and non-residents will go to harvest ticket hunts.</p>
<p><b>5) STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED ABOVE.</b>  <i>If one or more of the five criteria set forth above is not applicable, state that it is not.</i></p>
<p>a) To correct an error in regulation:  N/A</p>
<p>b) To correct an effect of a regulation that was unforeseen when a regulation was adopted:  N/A</p>
<p>c) Does the request identify a biological concern for the population or a threat to meeting objectives for the population?    Yes.</p>
<p>d) Does the request 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)?    No</p>
<p>e) Does the request 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?    No</p>
<p><b>6) WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?</b></p> <p>The Unit 19C sheep working group will not achieve our mandate. The board deferred all proposals for sheep hunting in Unit 19C out of cycle to allow the sheep working group to submit a proposal which is timely with the other proposals.</p> <p>The closure was a temporary measure put in place, and we are now in a position to create future hunting opportunities for multiple users groups with the proposed action.</p> <p>In this time of uncertainty, we are trying to ensure the healthy sheep populations in Unit 19C.</p>
<p><b>7) STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.</b></p>



We remain concerned primarily about the health of the sheep population in Unit 19C. Please refer to the charge statement of the working group, the results of the working group meeting in October 2024, and the attached letter.

This approach prioritizes the well-being of the species over the distribution of hunting opportunities. The primary goal is to balance the interests of conservation, local communities, and economic factors. These adjustments are about managing the resource sustainably rather than just allocating hunting rights.

**8) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.**

NA

**9) STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.** (e.g., hunter, guide, subsistence user, trapper, etc.)

Unit 19C sheep working group established by the Board of Game.

**10) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING.**

No

**Submitted by: Unit 19C sheep working group.**

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**Individual or Group**

---

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**Address**

**City, State**

**Zip**

---

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**Home Phone**

**Work Phone**

**Email**

**SIGNATURE:** \_\_\_\_\_

**DATE** \_\_\_\_\_

Note: Addresses and telephone numbers will not be published.

**MAIL, FAX, OR EMAIL THE COMPLETED FORM TO:**

Alaska Board of Game, P.O. BOX 115526, Juneau, AK 99811-526

Email: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

Fax: (907) 465-6094

discussions so not to be in conflict with their role as a Board of Game member, worked on this submission and then considered all the submitted proposals regarding sheep. The Unit 19C Sheep Working Group minus the two Board of Game members chose to support proposal 92 regarding hunter education, neither oppose nor support proposals 93-101,110, and 115-117, and oppose proposals 102-109,113,114, and 118 as these proposals are inconsistent with the proposal from the sheep working group. In addition, the sheep working group also oppose proposals 111 and 112 feeling they are highly complicated and potentially could involve litigation (see sheet 15).

Finally, the workshop ended with discussion of the specific messages to include in the letter that would get sent to the Board of Game and the Director of Wildlife. The Unit 19C Sheep Working Group asked Dr. Alistair Bath, the facilitator, to draft the letter on behalf of the group. The letter can be found after sheet 16. The workshop finished around lunch time after a day and a half of productive dialogue between the diverse members of the Unit 19C Sheep Working Group.

Sheet 15: Recommendations regarding submitted proposals to the Board of Game

SHEEP GROUP MAJORITY  
SUPPORT HUNTER  
EDUCATION (PROPOSAL  
92)

93 - NO ACTION  
94 - " "  
95 - " "  
96 - " "  
97 - " "

98 - NO ACTION  
99 - " " ~~102, 104,~~  
100 - " " ~~105, 106,~~  
101 - " " ~~107, 108~~  
~~102~~ - " "

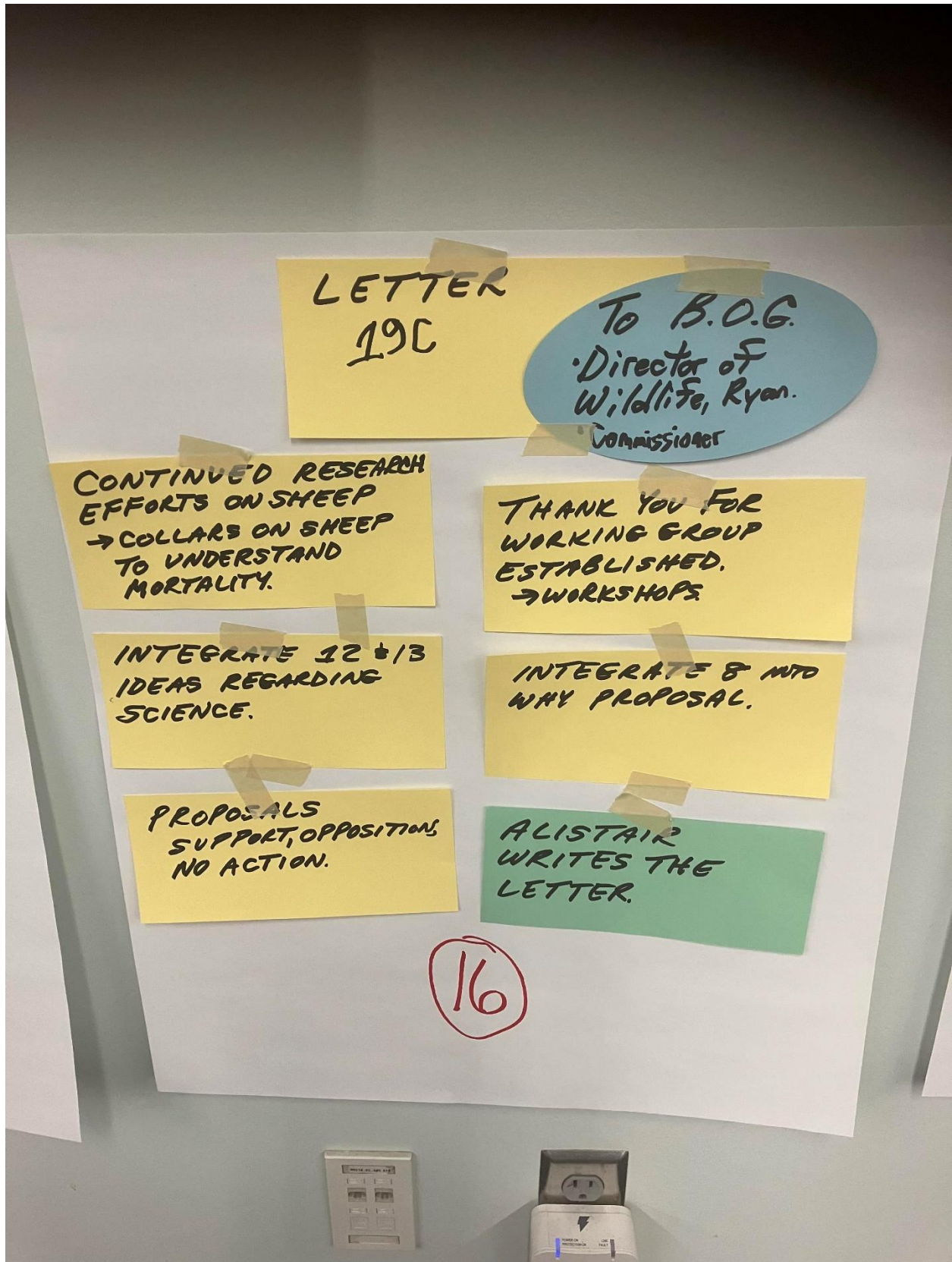
OPPOSE 102, 103,  
104, 105, 106, 107, 108,  
109, INCONSISTENT  
WITH OUR PROPOSAL

110 - NO ACTION  
111 - OPPOSE DUE TO  
COMPLICATED &  
112 POTENTIAL LITIGATION

~~113~~ 113 & 114  
OPPOSE INCONSISTENT  
WITH OUR PROPOSAL

115 - NO ACTION  
116 - " "  
117 - NO ACTION  
118 - OPPOSE, NOT CONSISTENT

15



## **Drafted Letter to be sent to Board of Game and the Director of Fish and Game**

October 21, 2024

To: Board of Game

To: Ryan Scott, Director of the Division of Wildlife Conservation, Alaska Fish and Game

From: Unit 19C Sheep Working Group

The Unit 19C Sheep Working Group members want to thank the Board of Game for creating the working group and giving it the opportunity to focus on understanding and addressing the key issues facing sheep in Game Management Unit 19C. Our group was comprised of nine individuals who collectively represented subsistence users, nonconsumptive users, guides, transporters, private landowners, and general Dall sheep hunters (see enclosed roster). During discussions regarding recommendations to be made to the Board of Game, including discussions regarding pending proposals and development of an Agenda Change Request, Board members Stosh Hoffman and Jake Fletcher did not participate. They reserved taking any action at the working group level in favor of fully participating as Board of Game members.

The group has worked hard through two facilitated two-day workshops (in June and most recently in October 2024) to be in a position to make recommendations. These recommendations are based on conservative management to ensure long-term sustainability of the Unit 19C Dall sheep population, sharing impacts among user groups, and exploring novel approaches to address declining sheep populations and increasing challenges between interest groups. Our recommendations are based on the best science (western and traditional knowledge) available, and we encourage the Alaska Department of Fish and Game to continue to learn about sheep populations, specifically adding radio collars to better understand mortality issues. Regarding any form of predator control, the sheep working group wants to assure positive results without causing unintended consequences, clear biological objectives that are measurable, humane control methods if used, clear efforts to gain public support, and most importantly to let science guide any steps regarding predator control. At this time, the sheep working group wishes to see the guidelines above followed and the research documenting mortality prior to any predator control for sheep.

The Unit 19C sheep working group made a specific proposal recommendation based upon a guide concessionaire program being in place. If this program isn't in place in time, the sheep working group would like to meet again in April 2026 to explore alternative possibilities. The sheep working group will do its best to be present with all members for the Board of Game discussions to be held in Anchorage in March 2025. To further assist the Board and implement the working group's mandate, the team went through the existing proposals submitted to the Board and wish to make the following recommendations. The sheep working group supports proposal 92 recommending hunter education. The group neither supports nor opposes proposals 93-101, 110, and 115-117. The sheep working group opposes proposals 102-109, 111-114 and 118 because these proposals are inconsistent with our proposal to the Board.

Once again, the Unit 19C Sheep Working Group expresses its gratitude to the Board for putting their faith into the working group to propose recommendations and better understand and address

the key issues facing Dall sheep in Unit 19C. Most members of the working group support these recommendations.

Sincerely,

Unit 19C Dall Sheep Working Group

Enclosure: Unit 19C Working Group Membership Roster



**Alaska Board of Game**

P.O. Box 115526

Juneau, AK 99811-5526

(907) 465-4110

[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

**Unit 19C Sheep Working Group Members**

Jerry Burnett, Board of Game, Chair

Stosh Hoffman, Board of Game Member

Jake Fletcher, Board of Game Member

Scott Crowther, Anchorage Advisory Committee

Brett Gibbens, McGrath Advisory Committee

Mike Litzen, Guide with Dall sheep hunting experience in Unit 19C

Michelle Quillin, Fall season Dall sheep resident hunter

Chait Borade of CIRI, Unit 19C private landowner

Patricia Owen, Denali National Park & Preserve, non-hunting use of Unit 19C

\*\*\*\*\*

Working Group members may be reached by contacting:  
Kristy Tibbles, Executive Director, Alaska Board of Game  
Email: [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov) | Phone: (907) 465-6098  
[www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

**Appendix 1: Written Public Testimony sent in advance of the Unit 19C Sheep Working Group Workshop**

**ALASKA BOARD OF GAME** Unit 19C Sheep Working Group Anchorage , AK | October 17-18, 2024 On-Time Comment Index

Aaron Bloomquist ..... PC01  
Scott Collins .....PC02  
Robert Fithian.....PC03  
Lucas Hickle.....PC04

**Name:** Aaron Bloomquist

PC01

**Community of Residence:** Palmer, Alaska

**Comment:**

Honorable Board Members,

As an active participant in Dall Sheep Management in Alaska for over 20 years, I would like to simply state some FACTS that many forget in these discussions, or chose to ignore in favor of emotional, non-fact based arguments. I was a participant in the original "Sheep Working Group", have served over 20 years on AC's (4 as chair of Anchorage AC), and currently chair the Big Game Commercial Services Board (these comments are my own, not as a member of the BGCSB). I have analyzed volumes of ADF&G sheep data including compiling average age of harvest by area for the original sheep working group among other data sets that ADF&G should have provided. First, there is ZERO biological need to change from our standard Full Curl/8year old management method. This fact has be reiterated every time we have decided to use some other type of method for social reasons. Most recently, ADF&G stated this fact during the original 19c discussion but it seems that a local biologist undermined the narrative to some extent for social reasons. It was stated definitively when 13D went to a draw, and that decision was made to preserve an experience, and to mitigate crowding (again a social decision). Before that, it was stated when the TMU went to a draw to manage for trophy rams (social decision). It was stated when Delta and Mt. Harper went to draw to preserve an esthetic wilderness experience (social decision). We have enough sheep in hunted areas right alongside closed National Park Units to show that hunting is simply not a factor in the overall populations of Dall Sheep. These NPS closed areas provide a great "control" area to observe populations and they have shown populations at the same level, within a fairly small margin of error. If we had to the



luxury to manage any other animal on an 8-year old average harvest, with only male take, we could literally have a year-round season and no bag limit and still have enough breeding age males to maintain the breeding of females in the population. Yes, we have some sheep taken under 8 years of age but 95% of the state has averaged over 8 long term. This is unarguably true for all species we hunt in Alaska, including slower breeding animals such as bears and goats. For moose and elk, if we could manage for 8-year-old take, we would have large trophies that were not even legal yet (as we do occasionally with sheep). Caribou and deer would have the majority of males die before they even become legal. Second, sheep management is largely self limiting with population fluctuations. We have seen effort and take, both in resident and nonresident statistical categories fluctuate with populations. It may take a couple years for everyone to figure it out, but in the mean time, we are still taking rams that average over 8 years of age. There may be small fluctuations in thing like hunter success and sublegal take, but, in the end, most hunters adapt to the resource available. Third, any time we make a drastic management decision, it adversely impacts other areas. I have been in the Eastern Brooks Range sheep mountains for about 20 years and have personally witnessed the fluctuations due to regulatory decisions. This is the most remote sheep hunting area and the most expensive to access. When the Chugach went on draw, we saw a marked increase in pressure. Now that 19c has had a drastic management decision, we have had an increase in pressure like no one has ever seen. Even though it was 100% on the back of nonresidents and guides, the residents also think there are no sheep left and have relocated. This trend has worsened exponentially in the couple years since the BOG closure. I have talked to many of these new-to-the-area hunters and 90% or more of them would have been hunting the Western Alaska range and NONE of them have even tried to look for sheep in 19C since the board decision. I also know a couple hunters that stuck in 19c and have been successful every year since. I was woke up by airplanes flying and looking for sheep at least once per day (the arctic has flying light early morning and late evening) from August 4-25th this year. We had a legal ram chased away by a plane on the 8th that I didn't relocate in 15 days of hiking. Even the ewes were acting very weird and spending more time in the rocks and high places. The passage of the no-fly-and- spot reg slowed down the flying for a while but now the cub guys know there is zero enforcement. Fourth, we have far fewer sheep hunters than at any time in a few decades but the country seems more crowded than ever. People are less willing to be in the same area as other hunters without causing a "conflict" or thinking the simple fact someone else is present is a "conflict". Much of this is due to the fact that the average sheep hunter has much more money and resources invested than in the past. Guides have relatively similar equipment as they did 30 years ago and use similar areas, although with far fewer hunters, but those hunters are paying 700% more than they were 30 years ago. Residents are fewer also but many have very expensive planes and lots of money to spend flying and relocating. This effort and investment in both categories makes people feel entitled to the area. This attitude makes the country seem more crowded, when, in reality, it is not. Add fewer sheep, almost statewide, and the anxiety of another person in "your spot" is amplified. In summary, the 19c decision was not necessary biologically and has adversely impacted other areas. If this type

of draconian decision is left to stand we are probably on our way to a statewide method change for social reasons (not biological). This fact bumps up against Article 8 constitutional questions. With these changes, are we managing for "sustained yield"? We will certainly not be managing at anything close to "maximum sustained yield". Are we really managing for the "maximum benefit of the people" (which the courts have directed the board to consider all "Alaskans " as "people", not just hunters); or will we be managing for maximum benefit of the few luck sheep hunters that can draw a tag; or maximum benefit of resident sheep hunters over the economic benefit of a guided sheep hunt which brings new money to the state and helps the ALL the "people" that don't hunt? Please overturn the 19c decision and return nonresident management to the tried and true full curl/ 8 year old method that allows for sustained yield and maximum benefit for Alaskans. Thank You!

**Name:** Scott Collins

PC02

**Community of Residence:** Anchorage, Alaska

**Comment:**

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

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

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

3) We need to recognize the reality of non-resident demand for hunting in Alaska, particularly sheep hunting demand. For practical purposes, non-resident demand for Alaska hunting is virtually unlimited. The demand far exceeds what the resource can bear and this is a trend that will continue to get worse. All other US Western states have recognized that non-resident demand will overwhelm hunting by residents in their own state. As a result, ALL other Western states significantly limit non-resident hunting through a draw permit process, while at the same time maintaining significantly more opportunity for their resident hunters. Although it varies a little from state to state, most Western states allow non-resident hunters to have permits for 10% or less of the sheep harvest. With that perspective, it's wildly beyond reason to allow non-residents to harvest 20% or 50% or 90% (as was the case in 19C in 2022) of the sheep harvest. We need to recognize that there is an allocation issue that must be addressed. It can and should be addressed while preserving resident hunting opportunity. Alaska has precedent for recognizing the need to limit non-resident harvest without limiting resident harvest. A great

example is black bear hunting in Southeast Alaska. Years ago it was recognized that non-resident harvest was the driver of unsustainable harvest. As a result we now require non-residents to draw a permit to hunt black bears in that area while continuing to allow residents to hunt using harvest tickets. I suggest this is a good model to use for managing sheep hunting, including in 19C. We should require non-residents to draw a permit to hunt sheep while allowing resident hunting to continue under existing regulations and bag limits using harvest tickets. This is the most impactful action we can take to preserve the opportunity for current and future generations of Alaskans to continue to hunt sheep.

Thank you for your work in this working group.

Scott Collins

Anchorage, Alaska

**Name:** Robert Fithian

PC03

**Community of Residence:** Anchorage, Alaska

**Comment:**

October 14, 2024

*Alaskan Mountain Safaris*

**Robert R. Fithian**

PO Box 378

Klawock, Alaska 99573

Phone: 907-320-0228

Email: fithian@cvinternet.net Web: www.akmountainsafaris.com

Comments Regarding GMU 19C Dall's Sheep Management and Hunting Seasons Dear GMU  
19C Dall's Sheep Working Group,

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

My experience in the conservation arena includes:

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

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

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

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

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

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

Comments:

1. Dall's sheep management has a long and proven success history by utilization of the full-curl concept. This management tool recognizes that harvest of 8 YO full-curl or older class rams does not affect annual recruitment.
2. The full curl law has held and maintained its performance ground. No matter how many older age class rams are harvested or die of natural causes, recruitment is still viable and sustainable through the less than full curl or eight-year-old rams. Harvest or die off of older aged rams has little or no effect on recruitment.
3. During the ensuing years after the 1989 and 1991 Alaska ballot initiatives passed which stripped the State's effective ability to manage our wolf populations, Dall's sheep, moose and caribou populations within my historical operating region within 19C dropped from moderate to Low- Density Equilibriums (LDE).
4. My historic records from the early 1980's to 1998 relative to the region I operate within, reflect annual sighting on average of 340 Dall's sheep per year.
5. Since the late 1990's Dall's sheep annual sighting by my records has numbered less than 100 within the region I operate within.

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

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

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

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

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

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

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

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

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

**Regarding your continued work as a Subcommittee:**

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

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

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

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

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

Strongly support the development of the Guide Concession Program.

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

Respectfully Submitted:

Robert R. Fithian

**Name:** Lucas Hickle

**Community of Residence:** Wasilla, Alaska

PC04

**Comment:**

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

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

My recommendation are:

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

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

Season as follows:

Resident-August 10th-September 20th

Non Res- August 15th-September 20th.



## **Appendix 2: Oral Public Testimony given at the Unit 19C Sheep Working Group Workshop**

### ***Oral Testimony by Zoom from Robert Fithian:***

My name is Robert Fithian. I'm calling from Hollis, Alaska. I'm an Alaska professional guide, conservationist, miner, rancher, logger, with a long history of leading leadership within these industries and ways of life. I have over 40 years of experience, providing long term, quality, conservation based fair chase true safari type hunting services within GMU 19C as a family operated business. My written comments were submitted to you under Alaskan mountain safaris and tiger resources conservation. I hope that you have, or will find the time to review those comments. And I'll be brief here today.

Please know that I care deeply about our wild sheep and the conservation of them, and that I submitted board game proposals to establish this working group, and an IM program for GMU 19C, and have long supported the creation of the guide concession program for State of Alaska lands, all 3 of which have come to fruition. Now relative to GMU 19C.

I lived through and documented low density, and equilibrium swings relative to Dall sheep within 19C. On several occasions this history is derived from the overall reduction of 19C Dall sheep population due directly to the substantial predation that occurred in the post ballot initiatives of 1989 and 1991, and the subsequent negative impacts of hard winters on the already low and held in check by predation Dall sheep population within 19C. In each case hunting under the proven full curl management strategy had no bearing on subsequent improved sheep recruitment.

Currently you now have the oncoming IM program being implemented for moose in 19C which undoubtedly will provide some predation relief to Dall sheep. And you have the long and hard fought for guide concession program being developed for 19C. And you have a Board of Game proposal requesting Dall sheep to be considered an IM species being addressed at the upcoming Statewide Board of Game meeting. In short, you could not have had better success and assistance to helping you address your concerns and your responsibilities as this working group.

My recommendations for you at this time would be to look carefully at your objectives and finalize your recommendations to the Board again promptly. You do not necessarily need a consensus, and the Board of Game needs your recommendations sooner than later. My history of Full Curl management, the creation of, or the history of Full curl management, the creation of a guide concession program and the added benefit of a predator management program within GMU 19C will provide for sustainable Dall sheep harvest by human hunters. General season dates for Dall sheep within 19C should stay the same as it has historically been for residents and non-residents, and if the board again does not reinstate the take, the taken away hunting opportunity and allocation, there will be rams dying in the field of old age. Old age should represent nothing but a loss to conservation and the economic needs of Alaska. In no way should you support a drawing permit program for 19C Sheep. The end result of that concept of allocation does not fit 19C, nor the long term or arduous effort to create the guide concession program. I encourage you to strongly support the continued development of the GCP. And my continued in the field observations relative to the flora and fauna within GMU 19C strongly support these comments and recommendations.

I thank you for your work, and I thank you respectfully for giving me the opportunity to testify.

***Oral Testimony in-person from Pete Imhoff:***

Alright, I'm a little nervous here because I'm jumping right in the middle of this. Thank you. Okay, this is an extract of harvest reports that I pulled for 34 years, both statewide and 19C. And I apologize if you guys already know all this. I've highlighted some numbers. Don't start my 5 min yet. (Pete was handing out to all participants information regarding harvest). And if anybody in the audience wants this, I'm sure the biologists probably have it. Some of the stuff I'm going to talk about has probably already been discussed or not; I hate wasting people's time, but first of all, I'd like to thank the working group to allow me to speak. I appreciate everyone for their service.

A little about me: I was raised in Alaska, went into elementary school high school in Kodiak, graduated in 81, started my sheep hunting endeavors in 79, and been fortunate enough to only miss 2 seasons and the 2 seasons that I missed I went to Canada to hunt sheep. Like many of us in this room, we care about our resources, and are very passionate about sheep. Saying that, I'm convinced if you put 10 sheep hunters together, or even guides, 10 sheep hunters together and ask the question, how would we manage sheep to this point forward? You would get 10 different answers. The question I would have here today is if we didn't lose our sheep to bad weather and unfavorable spring conditions, would we be here? My guess is no, which leads me to the numbers I've extracted from the Department's Harvest reports. I went back from 1990 to present day, in 19C and statewide. Please take a look at those numbers if you haven't already done so.

I know we're here for 19C working group, and I'm trying like that to stay on that track, but I just want everybody in this room to know it's a statewide issue, not just 19C. We got crowding issues. We got lack of sheep everywhere. So, another extract from the department's website, in 2014, Mr. Brinkman wrote a report from data collected from sheep hunters. Once again in 2014, 74% of the resident hunters agreed or strongly agreed, that sheep hunter crowding was a problem. Resident hunters mostly strongly agreed that the cause of the problem was related to commercial operations, non-resident hunters and fewer sheep. Remember, this report came out in 2014. Back in 2014, we had double the number of harvestable sheep in 2012, 2013 and 2014, compared to 2023 and 2024. Please once again refer to the harvest reports that I've extracted from the database. In 2023, I'm bouncing here a little bit, in 2023, 40% of our sheep statewide. (Public testimony not audible here) Not just. There were only 5 sheep harvested in 19 C, but statewide 40% of our sheep were 7 years of age or less. Makes a guy wonder if the Joe Watt rule really exists today in this world? I'm joking right? I know Joe's probably listening somewhere, but it's something to think about. So, remember, I'm 1 of those 10 sheep hunters with an idea. So please don't shoot me.

I wrote a proposal for all State lands to go to a guide concession with a limited on the tape somewhere to the north side of the brooks sounds easy, but we all know it won't be. We need to think about the cause and effects of going to a concession. What other species might see additional pressure from moving guides from 19C to other units that have sheep. I foresee caribou in the same boat down the road as an example. How do we protect other resources from over harvest? None of us 5 years from now want to go back and say, oh God, we didn't see that coming. So, let's think it through thoroughly. Maybe we go to a non-resident draw and let the guides compete for non-resident tags no different than 14C or other permitted areas. Might help those young guys get a foot in the door versus a concession, a lot to discuss there.

We need to remember whatever we do in 19C, it isn't going to bring sheep back any faster. In reality, we need mild winters and favorable spring conditions along with a lack of predation. We're only helping with the crowding issues.

And since I have 5 minutes, I get to talk a bit more. First off, when we have heavy commercial use, it doesn't matter if it's fishing or hunting, residents tend to back off. Kenai River is a prime example. Over-guided residents just tend to back off. We don't want to see the pressure so residents back off. And it's real obvious. When you look at this harbor (difficult to understand audible here) she reports the lack of resonant pressure in 19C and back to the keen eye. Same thing there. So even transporters are reluctant to drop resident hunters off in heavily guided areas. No fun for everyone. We need to remember that most of our pressure exists in the first 2 weeks of the season, so why can't we have a registration hunt or split season for residents? We have 42 days, plenty of room to work with.

Thank you, guys, for listening to my spiel. I appreciate it. Thank you.

***Oral Testimony in-person from Mark Richards:***

My name is Mark Richards. I'm the executive director of Resident Hunters of Alaska. Well, first, I want to thank the members of the working group for taking time out of your lives to participate in this group and make recommendations to the Board. Our organization did not support the formation expense of this working group. But I want y'all to know that we do appreciate you serving all the group and taking time out of your lives. So, it's important to understand how we got to this point. Why this working group was formed. How we got here is a sad story, but it's pretty simple to tell. Imagine you lived in a state with the only Dall sheep population in the country. Further, you would allow unlimited, non-resident Dall sheep hunting. Not only that, but you required all those non-residents to hire a guide, and you didn't limit the guides and the guided sheep hunt was \$30,000. You do not have to be a wildlife manager or a biologist to understand what would happen under that scenario. It's a given that there will be conflicts, crowding, undue competition for a limited resource among residents and non-residents.

Now, as to whether unlimited, Dall sheep hunting under full curl management negatively impacts sheep populations: In order for you all to make informed decisions and recommendations to the Board of Game, it's important to understand that we don't know. Fish and Game doesn't know. Biologists do not know whether or not unlimited Dall sheep hunting is sustainable, and I think it's time for the department to acknowledge that. Even if unlimited Dall sheep hunting was sustainable under full curl management, we know that allowing unlimited non-resident sheep hunting under the current framework causes the problems I just described. The Board of Game is on the record saying the same thing.

Now, as you all know, most of you know that for several cycles resident hunters of Alaska have been submitting proposals to the Board of Game to limit non-resident sheep hunters in 19C and other areas on State lands, but all those proposals were opposed by the guide industry, opposed by the Board of Game, and voted down. Now the rationale the Board of Game used to deny those proposals, was in large part that reducing non-resident sheep hunters to draw permits would decrease the money coming into Fish and Game from license and tag fees and Pitman Robertson funds. They also opposed these proposals because they felt it didn't provide stability to the guide industry. So, what the Board of Game and the Guide industry did support, was a guided concession program on state lands that would limit guides, strictly limit guides. The thing is, that program would have the same effect as our proposals to limit non-resident sheep hunters. There'd be less money coming into the department because there'd be fewer non-resident hunters. Not only would there be less stability to the guide industry, but plenty of guides would probably go out of business under guide concession programs. The Legislature passed the Guide concession program last year in a very strange way at the last minute, and the way they did it, it did not provide the funding that is necessary, the half million dollars. Half of that goes to DNR and half of it goes to Fish and Game for the staff that's going to be needed to implement the guided concession program. Now, I really doubt the legislator this session is going to fund the guided concession program, so we're at the same place we've been for the last 10 years. And it's time to stop kicking that can down the road. We have the only population of Dall sheep in this great country of ours. They are indeed a valuable resource, but not for the money they can bring in to the state and to the guide industry. The real value is in the opportunity for residents to be in the mountains and hunt them, and to eat them and put food on the table. I remind you all that sheep are a subsistence animal. There's subsistence, and customary and traditional practices. And there's several subsistence sheep hunts across the State.

I just want to close. You know, you guys are going to make recommendations, but it really all comes back to the same thing. Unlimited, non-resident Dall sheep hunting is causing all these problems. The guides agree. It's not good for the guides, residents, or anyone. That's why the guides support a guide concession program. But if that's not going to happen, I urge you all to realize that we just need to fix that problem limit non-residents. It'll solve these conflicts. It'll solve a lot of these issues that will reduce their harvest, and it will be better for everybody. So that's the recommendation I hope you make, and it's up to you to decide what the various allocations might be. But we do hope you arrive at that conclusion, that non-residents need to be limited. We've got to stop unlimited non-resident sheep hunting, not just in 19C, but on all State land.

So, thanks for your consideration, and thank you again for being here.