



November 7, 2024

An Agenda Change Request (ACR 5) has been submitted to the Alaska Board of Game (board) requesting to change 5 AAC 85.055. The proponent asks the board to: (1) In Regulatory Year 2025 (RY25) close all general season sheep hunts and the youth hunt in Unit 19C, but keep open the Unit 19C winter subsistence registration hunt (RS380). (2) Following the RY25 closure, establish a temporary two-year drawing permit hunt (RY26 & RY27) with 80% of the drawing permits allocated to residents and 20% to nonresidents, with a 5% cap for second degree kindred (2DK) nonresident hunters. Sheep taken by nonresidents hunting with resident relatives count toward the bag limit of the accompanying resident relative. (3) Establish Unit 19C as the pilot GMU for the Guide Concession Program, with implementation in place for guided opportunity occurring in Unit 19C starting in RY28. (4) If the Guide Concession Program is in place in Unit 19C for RY28, all general season sheep hunts will reopen with a harvest ticket and full curl management. This would mean that hunting opportunity for sheep in Unit 19C would follow the changes outlined in Table 1.

Table 1. Current (RY24) and proposed changes to the Unit 19C sheep hunting regulations. HT indicates harvest ticket and GCP indicates Guide Concession Program.

Regulatory Year	Proposed ACR Regulations			
	Resident	Nonresident	Youth Hunt	Subsistence Hunt
RY24	HT	Closed	Closed	Open - RS380
RY25	Closed	Closed	Closed	Open - RS380
RY26	Draw (80%)	Draw (20%)	Closed	Open - RS380
RY27	Draw (80%)	Draw (20%)	Closed	Open - RS380
RY28	HT	HT (GCP in place)	Open	Open - RS380

With respect to the board’s Agenda Change Request (ACR) acceptance criteria (5 AAC 92.005):

- A. The department is unaware of any error in regulation.
- B. The department is unaware of any effects of regulations that were unforeseen when the regulation was adopted.

- C. Biological concerns: Sheep trend counts in Unit 19C indicate there was a large decline in total sheep numbers beginning after the winter of 2018/2019. Surveys in 2024 show continued low numbers and this trend is largely thought to be based on winter weather events. In response to public concerns over sheep populations, the board formed a Unit 19C sheep working group to address sheep management in Unit 19C.
- D. The department is unaware of any unforeseen or unexpected events that would otherwise restrict or reduce a reasonable opportunity for customary and traditional wildlife uses as defined in AS 16.05.258(f).
- E. The department is unaware of any unexpected resource situation that would cause a biologically allowable resource harvest to be precluded by delayed regulatory action. As written, this ACR would institute regulatory action that would preclude a biologically allowable resource harvest opportunity for Regulatory Year 2025. Full-curl management allows for continued, conservative harvest of mature ram sheep.

There is a positive customary and traditional use finding for sheep in Unit 19, and an amount reasonably necessary for subsistence of 1-5 sheep. In March 2023, the board adopted Proposal 204 which closed the Unit 19C youth hunt as well as all nonresident hunting for a 5-year period. The general season fall hunt (harvest ticket) for residents remains open from August 10 – September 20. There is also a winter registration permit hunt (RS380) for residents only, October 1 – April 30, with a bag limit of one sheep with  $\frac{3}{4}$  curl horn or less; the take of rams with both horns broken, lambs, or ewes with lambs, is prohibited. The structure of this hunt provides subsistence opportunity according to customary and traditional use patterns. RS380 was closed by emergency order in RY20 and has had a restricted bag limit of rams only since RY21 due to biological concerns created by the harvest of ewes.

The next regularly scheduled board meeting for Unit 19 is during winter/spring of 2026/2027. If the board accepts this ACR, the department recommends the proposal come before the board at its March 2025 statewide meeting in Anchorage to allow for more public input and so the board can address it with the Unit 19C sheep proposals that were deferred from the March 2024 Board of Game meeting.

Sincerely,



Ryan Scott  
Director  
Division of Wildlife Conservation