

## Alaska Department of Fish and Game Comments

### **Wildlife Proposal WP26-76**

This proposal would extend the closure to sheep hunting on federal public land by all users in portions of Unit 25C and 20E through the 2026-2028 wildlife regulatory cycle.

### **Position**

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** extending the closure to sheep hunting on Federal lands for an additional two years. Emergency orders may be issued by ADF&G to close areas to the harvest of sheep when necessary to address public concern outside of conservative full curl management strategy.

### **Background**

Any recent declines in the sheep population were likely caused by weather-related events and not by human harvest. Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes anyways. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a drastically lower impact on population growth compared to female survival rates.

Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth. Additionally, we can demonstrate that harvest fluctuates proportional to the number of full-curl rams in the population with the full-curl strategy, and harvest of each cohort is proportional to the recruitment of each respective cohort. Therefore, we have high confidence that harvest is dependent on cohort abundance. For instance, harvest data from the Brooks Range (1987-2021; n = 7,476) demonstrates that on average 35% of legal rams harvested are harvested the first year they are legal (full-curl or 8.), whereas 65% of rams are harvested greater than 9 years of age. This gives us confidence that all legal rams are not immediately harvested annually, and that social structure tends to remain similar across a range of abundances with the full-curl management strategy, corroborating compensatory harvest.

### **Impact on Federally Qualified Users**

If adopted sheep hunting would continue to be closed for the RY 26 and RY 27 hunting seasons forcing FQUs to seek sheep hunting opportunities on state or private lands.

### **Impact on Other Users**

If adopted, sheep hunting would be limited to State or private lands outside of Yukon Charlie National Preserve and the Glacier Mountain Controlled Use Area.

### **Opportunity Provided by State**

**State customary and traditional use findings:** The Alaska Board of Game (BOG) has made a “negative” customary and traditional determination for sheep in GMU 25C and has not made a finding for sheep in GMU 20 outside of the Tok and Delta management areas.

### **Conservation Issues**

Although the full-curl harvest strategy is an extremely conservative approach to hunting management, there are times when more conservative strategies are warranted to address public concerns.

### **Enforcement Issues**

If adopted, there would be no additional enforcement issues expected.