



unapologetically **FOR ALASKAN RESIDENTS**

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Resident Hunters of Alaska (RHAK)
Comments to the Alaska Board of Game
Statewide Meeting
March 18-28, 2016

Sheep Issues – Proposals 21-49, and 138

Background:

For nearly a decade and through many Board of Game cycles, proposals have come before the Board asking for some kind of resident priority or preference when it comes to Dall sheep hunting. Generally, these requests revolve around declining sheep populations, competition and conflicts between guided nonresident and unguided resident hunters, fewer legal rams on the mountain, and the marginalization resident sheep hunters feel over the continued allowance of unlimited nonresident sheep hunting opportunities along with the unlimited big game guides most all nonresident sheep hunters are required to hire.

Resident sheep hunters feel like they've been unfairly treated, that for too long the state – via the Board of Game – has not had their best interests in mind. How else to explain the Board of Game continuing to avoid taking action on the numerous public proposals that have come before them asking for changes to our sheep hunting regulations, when the Board itself has acknowledged how resident sheep hunters are being disenfranchised under our current management and allocation plans?

No one denies that Dall sheep populations have been declining statewide.¹ No one denies that resident & nonresident sheep harvests and success rates over the last few decades has decreased.² No one denies that there are areas in the state where guided nonresident sheep hunters take 60-80% of the Dall sheep harvest annually.³ No one denies that statewide, nonresident sheep hunters harvest 40% of the sheep annually. The Board has even said on the record that this 40% statewide nonresident sheep harvest needs to be looked at: (*“There’s a lot of residents concerned that they’re taking 40%. And I think that’s something we should address.”* – Chairman Ted Spraker, Board Work Session January 2015)

No one denies that there are issues of crowding, of competition between the unguided resident sheep hunter and the guided nonresident sheep hunter, and conflicts between unlimited guides operating in the same areas.

¹ ADF&G Sheep Population Trends across Alaska (page 12)

² ADF&G Alaska Total Sheep Harvests 1985-2015 (page 13)

³ ADF&G Interim Reports GS000 Sheep (page 14)

Perhaps the best example of the problems we have surrounding sheep hunting in Alaska came from the Board Chairman himself, when he testified before the legislature in 2013 in support of a Guide Concession Program (that never came about and likely never will) to limit big game guides. It needs to be stressed that Chairman Spraker, when he testified before the legislature, was **not** speaking for himself; these were **not** his personal comments. Chairman Spraker was representing the thoughts of the entire Board of Game when he said: *“Another area the Board of Game is looking at, and I’m sure this is going to come up fairly soon, we’ve got a meeting in Fairbanks 2014 in the spring, and this is south of Fairbanks, 20A, there’s currently about 15 guides registered for this area. And from what I hear from other guides – I’m not a guide – but what I hear from other guides around the state is that the area can probably support about a third of that number and have some really quality hunting, so that’s another area we’re going to have to deal with, And here’s something else that I’m really concerned about. Is that, there’s a difference in having guides competing with guides, that’s one issue, but the way I look at it as a BOG member, and a real state’s rights sort of guy, is that this really puts a lot of competition on residents. Because guides are well equipped, they have large camps, wall tents, a string of horses, aircraft, they’re set up, I mean this is their business. For your average hunter that goes in there for a long weekend or a week or whatever, those guys, those residents have a tough time dealing and getting game in places where you have a lot of guide competition.”*⁴

And yet, in the face of known sheep declines the Board for years has refused to take action on the myriad problems they themselves acknowledge, instead time and time again asking for more studies and more data while continually deferring sheep proposals out of cycle and out of region, forcing the public proposers and Advisory Committee representatives to travel to different regions at great time and expense.

And if that were not enough to cause the acid in resident sheep hunter’s bellies to rise, the Board went one step further in January 2015 at a Work Session meeting and introduced a board-generated proposal of its own that for the first time ever included restrictions to resident sheep hunters. The Board also generated at that same meeting, and subsequently passed, another proposal to restrict the use of aircraft during sheep season in ways that were never before proposed by the public.

This clearly went against the Joint Boards policy and criteria on Board-generated proposals that says any Board-generated proposal has to be in the public’s best interest, that there is an urgency in considering the issue, that current processes are insufficient to bring the subject to the Board’s attention, and that there will be reasonable and adequate time for public comment.⁵ The one Board member who voted against the Board-generated proposals (Teresa Sager Albaugh) explained her position on the record: *“I guess I don’t see the same sense of urgency to necessarily adopt a board generated proposal and put some of these concepts out for public comment at this point. Simply because we’ve got a backlog of proposals and current proposals that are gonna be before us in February and March that we need to act on. All of those*

⁴ House Resources Committee testimony, March 11, 2013 (full transcript page 24)

⁵ Joint Boards Criteria for Development of Board-Generated Proposals (page 27)

proposals came to us through the regular anticipated process by the public. And I think there is close to thirty on sheep alone if you combine the two meetings and the deferred proposals.”⁶

These Board-generated proposals were promulgated ahead of the February 2015 Region IV meeting in Wasilla that Board member Sager-Albaugh mentioned, the venue where the sheep proposals deferred from the 2014 Region III meeting were to be heard. As stated, there were already many public proposals before the Board requesting changes to sheep hunting regulations, yet the Board added two of their own that (again) contained recommendations never before expressed by the public.

In the end, the Board of Game expressed that they wanted statewide solutions to the sheep issues, deferred all the sheep proposals (including the Board-generated proposals) to the March 2015 Region II March meeting in Anchorage, where they took no action or voted down all but their own Board-generated proposals. The Board passed the Board-generated proposal restricting how aircraft could be used during sheep season, even though the vast majority of Advisory Committee and public comments were against it, and even though the Alaska Wildlife Troopers strongly opposed it, and then deferred their other Board-generated sheep proposal to the 2016 Statewide meeting.

The only proposal regarding sheep issues, then, before the Board at the Statewide 2016 meeting, was the Board’s very own proposal that contained never-before suggested restrictions on resident sheep hunters! And if that wasn’t enough, the public was told that they could not submit any proposals for the 2016 Statewide meeting regarding sheep.

It wasn’t until another organization sent in a letter to the Board and to the Department of Law demanding the public also be allowed to submit sheep proposals for the 2016 Statewide meeting that a costly special meeting of the Board was conducted where the decision was changed and the public was allowed (like the Board) to submit their own statewide sheep proposals.

However, the public was told that even though the 2016 Statewide meeting included statewide regulations under 5AAC Chapters 92 & 98 (the new 3-year Board cycle now combined Cycle A & B statewide call for proposals), some of the statewide regulations under 5AAC Chapter 98 were not allowed on the call for proposals. In particular, 5AAC 92.008, which sets statewide harvest guideline levels that many of the sheep proposals sought to address, was not allowed on the call for proposals. Neither Board support nor ADF&G nor the Board of Game had an answer as to why 5AAC 92.008 was specifically not allowed on the statewide call for proposals.

By the deadline to submit sheep proposals for the Statewide 2016 meeting, the Board received yet again many of the same types of proposals from the same members of the public and organizations that they’d received in the past decade yet taken no action on.

⁶ January 2015 Board of Game Work Session comments

And some proposals were refused because they asked to address nonresident sheep harvest levels that fell under 5AAC 92.008.

Further complicating things, in the latter part of 2015 the Board supported and sanctioned a Sheep Working Group (SWG) made up of members of the public and various organization representatives and Advisory Committee representatives, that was supposed to reach a 100% consensus on solutions and recommendations on sheep issues to the Board prior to the 2016 Statewide meeting.

ADF&G stated that they would wait for the recommendations of the SWG before making final comments on the sheep proposals before the Board at the 2016 Statewide meeting. The Board also expressed that they wanted to see the recommendations of the SWG before making any decisions.

The SWG ended up with nearly a quarter of its membership comprised of big game guides. Some other members were obviously not there to compromise on already hardened positions their ACs or organizations had taken in the past. Many of the SWG members expressed distrust of the Board of Game because of years of taking no action on sheep issues and for the two Board-generated proposals they felt went against our public system of wildlife management. It was evident early on that there would be no “100% consensus” from the group. The rules everyone who signed onto the SWG agreed to were changed; a majority vote would now suffice as long as it was somewhere in the 80/20 range or higher. Over six days of meetings that cost tens of thousands of dollars, the SWG did not come up with any recommendations to the Board of Game, and won’t meet again until after the 2016 Statewide meeting.

So here we are in the present, a little more than two weeks before the 2016 Statewide Board of Game meeting in Fairbanks when these comments are due. We know now what we knew several years ago, that sheep populations have declined, that unlimited nonresident sheep hunting opportunity in conjunction with unlimited guides is causing conflicts and competition between user groups and can lead to overharvests and restrictions for all, that nonresident sheep harvest rates greatly exceed that of residents in some areas, and that nonresidents continue to take 40% of the sheep harvests statewide.

The Board of Game chairman expressed in 2014 at the Region III meeting in Fairbanks that if any changes to sheep hunting regulations were to take place, it should be a “shared burden” between resident and nonresident sheep hunters.⁷ Which is exactly what the Board-generated proposal (#48) before the Board at this Statewide meeting includes.

⁷ *“Most of the emphasis in these [sheep] proposals is to do something with nonresidents. I strongly believe it needs to be a shared burden. I think there needs to be residents doing something as well, because we’re all looking out to protect sheep. We want to keep sheep on the mountain and keep the hunting opportunities available.”* – Chairman Spraker 2014 Region III meeting

We argue that for far too long resident sheep hunters have unfairly shared the burden with an unlimited number of nonresident guided hunters, which the Board acknowledges has led to draw-only restrictions for all in other areas of the state. It is well past time for the entire Board of Game membership to recognize and acknowledge that resident sheep hunters have been disenfranchised and that their opportunity to hunt sheep is threatened if we don't deal with the unlimited nonresident sheep hunting component.

It is clear that if any restrictions to hunting opportunity should be considered that nonresident hunters are limited first. It says so right in the "handy dandy" Hunting Regulations on Page 7: *"When there isn't enough game, nonresident hunters are restricted or eliminated first."*

It also states in statute (16.05.256) that: *"Whenever it is necessary to restrict the taking of big game so that the opportunity for state residents to take big game can be reasonably satisfied in accordance with sustained yield principles, the Board of Game may, through a permit system, limit the taking of big game by nonresidents and nonresident aliens to accomplish that purpose."*

We further posit that our Alaska state constitution gives a clear preference to all Alaskans over nonresidents in terms of the ability to harvest the vast bulk of our state wildlife resources. As our Alaska Supreme Court found: *"The State of Alaska devotes substantial resources to the protection and management of fish and wildlife. As the trustee of those resources for the people of the state, the state is required to maximize for state residents the benefits of state resources."*⁸

The logical and fair product of the 2016 Statewide Board of Game meeting should be the restriction of nonresident sheep hunters based on harvest levels in order to better conserve Dall sheep populations and to continue to provide resident general sheep hunting opportunities.

Comments on Sheep Proposals

Proposals 21-26 – Amending or Rescinding Board-generated proposal #207 that restricts how aircraft can be used during sheep season

Resident Hunters of Alaska (RHAK) **supports** Proposal 23 from the Mat-Su Advisory Committee to rescind Board-generated proposal #207 that was passed and adopted by the Board into regulation.

We completely agree with the Mat-Su Advisory Committee that the Board of Game did not follow their own criteria when generating Proposal 207. This alone should invalidate it completely.

⁸ Shepherd v. State, Alaska Dept. of Fish & Game

We also completely agree with the Alaska Wildlife Troopers on their position in support of Proposal 23, that the aircraft restrictions now in place during sheep hunting season are unenforceable and will add unnecessary costs to AWT.

A better avenue to address the use of aircraft during sheep seasons would be educational programs like we currently have in place for pilots and air-taxis operating in Unit 23 during caribou hunts whereby they take an online course from ADF&G about the proper use of aircraft for hunting purposes in that area. The same thing could be done for pilots and commercial carriers who use aircraft for sheep hunting purposes.

Proposals 28, 30 & 35

RHAK **opposes** any statewide changes to resident sheep hunting opportunities, including any 1 in 4 or 1 in 3 years opportunity, or any restrictions having to do with first 10 days of the season based on last name or any other criteria.

At the 2015 Region IV meeting, data on Hunter Effort by sheep hunters (resident & nonresident) was presented to the Board in order to inform the deliberations on any 1-in-4 year sheep hunting opportunity regulation.⁹

The bottom line is that any changes to sheep hunting opportunity based on a 1 in 4 or 1 in 3 year opportunity are negligible in terms of reducing perceived crowding or harvests and unfairly target a very small minority of resident sheep hunters who utilize the opportunity to hunt sheep every year under a general open season.

Regarding proposal 35, allowing resident sheep hunters to only hunt the first ten days of the season every few years based on their last name unfairly restricts resident sheep hunting opportunities and as the majority of resident sheep hunters hunt in pairs, it has the potential to break apart hunting partners with different last names.

Proposal 31

RHAK **opposes** proposal 31. ADF&G takes into account hunters who do not hunt after winning a sheep or goat draw permit and allocates a higher number of draw permits based on that knowledge. Allowing only one sheep or goat draw permit every 3 years also has a much greater negative effect on the resident hunter than it does the nonresident hunter.

Proposal 32

RHAK **opposes** proposal 32 to put all sheep hunts for residents and nonresidents on draw-only permits. This proposal does the exact opposite of what the proposer states (“Residents will have their priority”). It would negate a resident priority to general sheep

⁹ RC 53, compiled by Lohuis and Clark -

http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2014-2015/Central_Southwest_02_13_15/rcs/rc053_Tom_Lohuis_Sheep_Hunter_Effort.pdf

hunting opportunity. We don't believe that resident sheep hunters currently need to be restricted in any way.

Furthermore, big game guides with concessions on federal lands such as Refuges and National Preserves **do not** have "their permit numbers issued by the federal land manager" as the proposer states. On USFWS and NPS lands where sheep hunting takes place, the Board of Game sets allocation levels via general season or draw-only hunts. Federal guide concession holders are bound by their own prospectus plan document that states how many clients for each game species they will run each season.

Proposal 33

RHAK **opposes** proposal 33. The very last thing we need is a nonresident-only sheep hunting season, no matter what part of the season it falls under and no matter if it is once every ten years or once every two years. We've already pointed out that 90% of nonresident sheep hunters only hunt sheep one time.

Proposing a resident-only early season that is allowed only once every three years as a way of reducing crowding and as a selling point for a nonresident-only season August 10- 17 doesn't make sense in the face of the declining sheep populations the proposer mentions. Any nonresident-only sheep season would likely exacerbate the problems we already have in general-season areas on state and BLM lands with unlimited guides. Guides would likely hire more assistants and book more clients and take more sheep.

Nonresident sheep hunters need to be reduced, not given their own special hunting season.

Proposal 34

RHAK **opposes** proposal 34, from the same proposers as proposal 33. It would seem they are trying to throw as much at the wall as possible in hopes that something will stick, in order that nonresident sheep hunters don't go to draw-only permits statewide.

The access and weapons restrictions in this proposal unfairly impact the resident sheep hunter and his or her opportunity to access sheep country and successfully harvest a legal ram.

Proposals 36, 37, & 38 – Resident-only early season and shortened nonresident sheep season

RHAK wants to stress that our preferred solution to the problems surrounding sheep hunting is to restrict all nonresident sheep hunters to draw only hunts with a set harvest allocation of 10% of the total sheep harvest annually, with no change to resident sheep hunting opportunity.

It's imperative that the Board recognize that nonresident sheep hunters need to be limited to draw only hunts as a starting point in trying to mitigate the issues of crowding, conflicts and competition, as well as reducing harvests in the face of declining sheep populations.

While an early resident only season would appear to give a priority to resident sheep hunters, we don't know how guides would respond. In the past when this issue was before the Board, many resident guides testified that they would hunt the early resident only season (which certainly is their right), and most guides also said they would still be in the field prior to the resident-only opening day (Aug. 10), have aircraft in the field and on airstrips, do some pre-season scouting, set up camps, bring in packers and assistants etc. The potential for continued conflicts and crowding is still there, as well as the potential for reduced resident access because guides and the commercial air carriers that fly for them tend to lock up some areas. And we don't know if an early resident-only season would end up reducing harvests for nonresident guided sheep hunters.

It's well past time that the Board use their authority to restrict nonresident sheep hunters to draw-only hunts. That is the right thing to do according to statute and policy.

RHAK therefore cannot support an early resident-only season because we don't believe it fixes the main problem of unlimited nonresident sheep hunting opportunities.

Proposal 39

RHAK **supports** the preferred solution in proposal 39, for the Board to put all nonresident sheep hunters on a draw-only system with allocation levels set by total statewide harvest guidelines.

The Board has repeatedly stated that they want to deal with sheep issues on a statewide basis, yet they refuse to accept any statewide proposals that fall under the statewide harvest guideline levels in 5AAC 92.008. This makes absolutely no sense and no one at Board support or Department of Law or the Board of Game knows just who or what entity disallowed 5AAC 92.008 on the statewide call for proposals under the new conjoined three-year Cycle A & B statewide meetings.

Nonresident sheep hunters currently take 40% of the statewide harvest of Dall sheep annually, and in other areas take 60-80% of the total harvest. The Board has stated in the past that the 40% nonresident statewide sheep harvests is a concern that should be addressed.¹⁰

The best way to limit nonresident sheep hunters is to base it on total statewide harvest levels, broken down by subunit. We advocate for a 10% maximum nonresident statewide sheep harvest using 5AAC 92.008 as a vehicle to do so, using the last 5-10

¹⁰ "There's a lot of residents concerned that they're taking 40%. And I think that's something we should address." – Chairman Ted Spraker, Board Work Session January 2015

years of historical nonresident harvests as a dataset to initially determine allocation levels. The Board's position that 5AAC 92.008 only applies to specific regions and can only be allowed on the call for regional meetings confounds the fact that 5 AAC 92.008 is under **statewide regulations** and that the Board repeatedly has stated that they want to deal with these sheep issues on a statewide basis. The Board can certainly base draw-only hunts for nonresident sheep hunters on harvest levels by subunit statewide.

The Director of ADF&G Division of Wildlife Conservation has also stated to the Board-sanctioned Sheep Working Group: "*The Department is not opposed to dealing with sheep on a statewide basis.*"

Again, if the Board and the Department want to deal with sheep issues on a statewide basis, then 5AAC 92.008 would seem the right regulatory framework to do so.

Proposal 48 (formerly proposal 208) – Board of Game-generated proposal

RHAK strongly **opposes** proposal 48.

As we previously stated in our comments on sheep issues, we believe this Board-generated proposal did not meet the criteria for Board-generated proposals. It was an end-around our public system of wildlife management for the Board to propose changes to sheep hunting never before offered by the public, and to defer their own proposal to the 2016 Statewide meeting while taking no action on or voting down all the other sheep proposals from the public before them in 2015.

The very fact that this proposal is before us now is a testament that the Board of Game is broken. This proposal should not be on the docket and should not even be heard or deliberated on. It takes time and attention away from the other sheep proposals from the public and gives the impression that the Board-generated proposal is more valid or has more chance of passing in some form.

We urge the Board to pull proposal 48 from the 2016 Statewide meeting proposals.

Proposal 138

RHAK **opposes** proposal 138 to restrict all nonresident sheep hunters to draw-only hunts with a harvest allocation level of up to 30% of the total harvest.

We support the concept, however, to restrict all nonresident sheep hunters to draw-only hunts with an allocation based on harvest levels. But we don't believe nonresident sheep harvest levels by subunit or statewide should be higher than 10% of the total harvests.

Comments on other Proposals

Proposal 19

RHAK **supports** proposal 19 to codify the Joint Boards policy and criteria for Board-generated proposals, and to include new language in the criteria that there shall be an adequate opportunity for public comments of no less than 65 days.

We also support language that the Board of Game shall meet **all** the elements of the criteria for Board-generated proposals.

Proposal 71

RHAK **opposes** proposal 71. We have concerns that pilots may be unfairly accused of violating same-day-airborne regulations with this additional language in the SDA regulations. The SDA regulation has been in place for a very long time, along with prohibitions covering the use of radios or communications to assist in the taking of game, and we see no reason to adopt this new language in the SDA regulations.

Proposal 101

RHAK **supports** proposal 101 to limit the limit the allocation of draw permits awarded to nonresident hunters to a maximum of 10% of the available permits. Resident Alaskan hunters should always have a clear priority to our game resources.

Proposal 102

RHAK **supports** proposal 102 to require all nonresident drawing permits – specifically those allocated to Next-of-Kin (NOK) hunters who will hunt with an Alaskan resident relative – to be placed in a nonresident category or pool. A nonresident is a nonresident regardless if he or she has a relative living in Alaska, and resident Alaskan hunters should not have the chance of being awarded a draw permit reduced by including NOK nonresident hunters in the resident pool of available draw permits.

Proposal 108

RHAK **supports** proposal 108. It seems that the requirement for most all nonresidents to utilize a licensed big game guide when hunting brown/grizzly bear, sheep & mountain goat, has been unfairly extended to other species such as moose and black bear. The State of Alaska should not be in the business of subsidizing the guide industry by forcing nonresidents to be guided for species other than currently in statute. If and when there are conservation concerns or other concerns for species other than brown/grizzly bear, sheep and mountain goat, the way to address those is through allocation of permits or reduced opportunity, or other means other than the requirement that a nonresident must hire a licensed big game guide.

The entire must-be-guided regulation and rationale for it is called into question when species other than those currently in statute are added to the must-be-guided list. We would also add that the entire must-be-guided law and the rationale behind it is

continually called into question with the Next-Of-Kin regulation that allows someone 19 years or older only in Alaska one year and with absolutely no hunting experience to “guide” a nonresident relative for grizzly/brown bear, sheep and mountain goat.

Proposal 135 – ADF&G proposed increase to nonresident brown bear permits in Unit 22

RHAK **opposes** and is confounded by proposal 135 from the Alaska Department of Fish & Game. In all the sheep proposals that ask to limit nonresident sheep hunters, the Department has said they are **neutral** on allocation matters. Yet this proposal from the Department seeks to increase the nonresident allocation of brown bear permits awarded for DB690, using the rationale that the while the Department does not have a population estimate for brown bears in Unit 22, the population can support additional nonresident drawing permits. Also, the Department “anticipates there will be an increased harvest of brown bears” by nonresident hunters if this proposal passes.

This proposal calls into question the Department’s position on neutrality on allocation issues when it comes to limiting or restricting nonresident hunters. The Department can’t have it both ways, be neutral on allocation matters that restrict nonresidents on one hand but actually espouse allocation increases to nonresidents on the other.

This proposal clearly would result in less harvest percentage going to resident brown bear hunters. It is plainly allocative in nature in favor of increased nonresident opportunity and harvests.

End of Proposal Comments

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Footnote Documents Begin Next Page

Footnote Documents

¹ ADF&G Sheep Population Trends across Alaska

Sheep Population trends across Alaska:

Survey and Inventory Report Area	Population Trend
Kenai Peninsula	Decreasing
Alaska Range west	Stable
South Wrangell Mountains	Stable or Increasing
Chugach Mountains	Stable at low levels
Mentasta, Nutzotin, and N. Wrangells	Stable or Decreasing
Tok Management Area	Stable or Decreasing
Talkeetna Mtns., Chulitna-Watana Hills	Stable at low levels
Delta Controlled Use Area	Stable
N. AK Range, E. of Nenana Riv., W. of Delta Riv.	Stable
White Mountains	Stable
Tanana Hills	Stable
Western Brooks Range	Decreasing
Central Brooks Range	Stable or Decreasing
Eastern Brooks Range	Stable or Decreasing

1990	2000	2010
56,740 (53,900-62,400)	50,850 (48,300-55,900)	45,010 (42,800-49,500)

² ADF&G Alaska Total Sheep Harvests 1985-2015

ALASKA TOTAL SHEEP HARVEST 1985-2015 (GEN AND DRAW)

	RESIDENT			NON-RESIDENT			UNKNOWN		TOT HARV	Success %
	SUCC	UNSUCC	%	SUCC	UNSUCC	%	SUCC	UNSUCC		
1985	784	1532	34%	330	103	76%	15	18	1129	41%
1986	866	1666	34%	381	104	79%	53	70	1300	41%
1987	869	1771	33%	434	117	79%	61	63	1364	41%
1988	886	1651	35%	491	139	78%	64	91	1441	43%
1989	930	1696	35%	475	145	77%	49	42	1454	44%
1990	852	1819	32%	493	160	75%	62	64	1407	41%
1991	944	2028	32%	447	164	73%	30	32	1421	39%
1992	716	1988	26%	368	164	69%	25	41	1109	34%
1993	758	2157	26%	323	171	65%	24	30	1105	32%
1994	661	2083	24%	347	168	67%	19	20	1027	31%
1995	729	2035	26%	402	183	69%	5	23	1136	34%
1996	701	2032	26%	365	184	66%	24	31	1090	33%
1997	557	1871	23%	364	176	67%	26	51	947	31%
1998	619	1946	24%	366	219	63%	15	9	1000	31%
1999	592	1961	23%	348	215	62%	11	9	951	30%
2000	486	1955	20%	293	249	54%	12	19	791	26%
2001	542	1741	24%	338	180	65%	13	25	893	31%
2002	563	1762	24%	319	226	59%	14	14	896	31%
2003	595	1702	26%	360	195	65%	4	20	959	33%
2004	582	1693	26%	363	150	71%	19	38	964	34%
2005	540	1554	26%	372	182	67%	9	8	921	35%
2006	486	1649	23%	339	219	61%	11	14	836	31%
2007	514	1769	23%	403	197	67%	20	24	937	32%
2008	480	1644	23%	308	181	63%	55	76	843	31%
2009	459	1553	23%	336	174	66%	20	25	815	32%
2010	447	1492	23%	295	160	65%	6	24	748	31%
2011	458	1358	25%	334	124	73%	28	58	820	35%
2012	403	1302	24%	268	159	63%	58	178	729	31%
2013	425	1413	23%	266	152	64%	11	20	702	31%
2014	414	1416	23%	264	175	60%	5	8	683	30%
2015	389	1219	24%	264	197	57%	7	5	670	32%

³ADF&G Interim Reports GS000 Sheep by subunit 2010-2014 20A

Interim Reports GS000 Sheep - Year 2010 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	45	29.4% <i>29.4% of all overlays</i>	108	70.6% <i>70.6% of all overlays</i>	0	0%	153	100%
Non Res	67	77.9% <i>77.9% of all overlays</i>	19	22.1% <i>22.1% of all overlays</i>	0	0%	86	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	112	46.9%	127	53.1%	0	0%	239	100%

Total Juveniles:	3
Animals Harvested:	112

Total Resident Hunters = 153 (64%)

Total Nonresident Hunters = (36%)

Nonresident Harvest = 67 of 112 (60%)

Interim Reports GS000 Sheep - Year 2011 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	41	24.8% <i>24.8% of all overlays</i>	124	75.2% <i>75.2% of all overlays</i>	0	0%	165	100%
Non Res	62	71.3% <i>71.3% of all overlays</i>	25	28.7% <i>28.7% of all overlays</i>	0	0%	87	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	1	100%
Total	104	41.1%	149	58.9%	0	0%	253	100%

Total Juveniles:	3
Animals Harvested:	104

Total Resident Hunters = 165 (65%)

Total Nonresident Hunters = 87 (35%)

Nonresident Harvest = 62 of 103 (60%)

Interim Reports GS000 Sheep - Year 2012 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	47	28.7% <i>28.7% of all overlays</i>	117	71.3% <i>71.3% of all overlays</i>	0	0%	164	100%
Non Res	46	64.8% <i>64.8% of all overlays</i>	25	35.2% <i>35.2% of all overlays</i>	0	0%	71	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	50% <i>50% of all tickets</i>	1	50% <i>50% of all tickets</i>	0	0%	2	100%
Total	94	39.7%	143	60.3%	0	0%	237	100%

Total Juveniles:	3
Total Seniors:	1
Animals Harvested:	94

Total Resident Hunters = 164 (70%)
 Total Nonresident Hunters = 71(30%)

Nonresident Harvest = 46 of 93 (49%)

Interim Reports GS000 Sheep - Year 2013 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	46	25.4% <i>25.4% of all overlays</i>	135	74.6% <i>74.6% of all overlays</i>	0	0%	181	100%
Non Res	49	66.2% <i>66.2% of all overlays</i>	25	33.8% <i>33.8% of all overlays</i>	0	0%	74	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	95	37.1%	161	62.9%	0	0%	256	100%

Total Juveniles:	2
Animals Harvested:	95

Total Resident Hunters = 181 (71%)
 Total Nonresident Hunters = 74 (29%)

Nonresident Harvest = 49 of 95 (52%)

Interim Reports GS000 Sheep - Year 2014 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	50	24% <i>24% of all overlays</i>	158	76% <i>76% of all overlays</i>	0	0%	208	100%
Non Res	61	71.8% <i>71.8% of all overlays</i>	24	28.2% <i>28.2% of all overlays</i>	0	0%	85	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	2	66.7% <i>66.7% of all tickets</i>	1	33.3% <i>33.3% of all tickets</i>	0	0%	3	100%
Total	113	38.2%	183	61.8%	0	0%	296	100%

Total Juveniles:	2
Animals Harvested:	113

Total Resident Hunters = 208 (71%)
 Total Nonresident Hunters = 85 (29%)

Nonresident Harvest = 61 of 111 (55%)

2015 Preliminary Data from ADFG 20A

Total Resident Hunters = 165 (71%)
 Total Nonresident Hunters = 66 (29%)

Nonresident Harvest = 40 of 72 (56%)

19C

Interim Reports GS000 Sheep - Year 2010 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	19	29.7% <i>29.7% of all overlays</i>	45	70.3% <i>70.3% of all overlays</i>	0	0%	64	100%
Non Res	49	67.1% <i>67.1% of all overlays</i>	24	32.9% <i>32.9% of all overlays</i>	0	0%	73	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	2	100% <i>100% of all tickets</i>	0	0%	2	100%
Total	68	48.9%	71	51.1%	0	0%	139	100%

Total Juveniles:	1
Animals Harvested:	68

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Total Resident Hunters = 64 (47%)

Total Nonresident Hunters = 73 (53%)

Nonresident Harvest = 49 of 68 (72%)

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	11	18% <i>18% of all overlays</i>	50	82% <i>82% of all overlays</i>	0	0%	61	100%
Non Res	67	82.7% <i>82.7% of all overlays</i>	14	17.3% <i>17.3% of all overlays</i>	0	0%	81	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	3	100%
Total	81	55.9%	64	44.1%	0	0%	145	100%

Total Juveniles:	1
Animals Harvested:	81

Total Resident Hunters = 61 (43%)

Total Nonresident Hunters = 81 (57%)

Nonresident Harvest = 67 of 78 (86%)

Interim Reports GS000 Sheep - Year 2012 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	24	38.7% <i>38.7% of all overlays</i>	38	61.3% <i>61.3% of all overlays</i>	0	0%	62	100%
Non Res	60	77.9% <i>77.9% of all overlays</i>	17	22.1% <i>22.1% of all overlays</i>	0	0%	77	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	1	100%
Total	85	60.7%	55	39.3%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	85

Total Resident Hunters = 62 (45%)

Total Nonresident Hunters = 77 (55%)

Nonresident Harvest = 60 of 84 (71%)

Interim Reports GS000 Sheep - Year 2013 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	27	39.1% <i>39.1% of all overlays</i>	42	60.9% <i>60.9% of all overlays</i>	0	0%	69	100%
Non Res	52	61.9% <i>61.9% of all overlays</i>	32	38.1% <i>38.1% of all overlays</i>	0	0%	84	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	60% <i>60% of all tickets</i>	2	40% <i>40% of all tickets</i>	0	0%	5	100%
Total	82	51.9%	76	48.1%	0	0%	158	100%

Total Juveniles:	1
Animals Harvested:	82

Total Resident Hunters = 69 (45%)

Total Nonresident Hunters = 84 (55%)

Nonresident Harvest = 52 of 79 (66%)

Interim Reports GS000 Sheep - Year 2014 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	29	36.7% <i>36.7% of all overlays</i>	50	63.3% <i>63.3% of all overlays</i>	0	0%	79	100%
Non Res	51	56.7% <i>56.7% of all overlays</i>	39	43.3% <i>43.3% of all overlays</i>	0	0%	90	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	75% <i>75% of all tickets</i>	1	25% <i>25% of all tickets</i>	0	0%	4	100%
Total	83	48%	90	52%	0	0%	173	100%

Total Juveniles:	3
Animals Harvested:	83

Total Resident Hunters = 79 (47%)

Total Nonresident Hunters = 90 (53%)

Nonresident Harvest = 51 of 80 (64%)

26B

Interim Reports GS000 Sheep - Year 2010 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	46	29.5% <i>29.5% of all overlays</i>	110	70.5% <i>70.5% of all overlays</i>	0	0%	156	100%
Non Res	17	56.7% <i>56.7% of all overlays</i>	13	43.3% <i>43.3% of all overlays</i>	0	0%	30	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	63	33.9%	123	66.1%	0	0%	186	100%

Total Juveniles:	2
Animals Harvested:	63

Total Resident Hunters = 156 (84%)
 Total Nonresident Hunters = 30 (16%)

Nonresident Harvest = 17 of 63 (27%)

Interim Reports GS000 Sheep - Year 2011 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	38	24.7% <i>24.7% of all overlays</i>	116	75.3% <i>75.3% of all overlays</i>	0	0%	154	100%
Non Res	17	60.7% <i>60.7% of all overlays</i>	11	39.3% <i>39.3% of all overlays</i>	0	0%	28	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	55	30.1%	128	69.9%	0	0%	183	100%

Total Juveniles:	1
Animals Harvested:	55

Total Resident Hunters = 154 (85%)
 Total Nonresident Hunters = 28 (15%)

Nonresident Harvest = 17 of 55 (31%)

Interim Reports GS000 Sheep - Year 2012 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	48	29.1% <i>29.1% of all overlays</i>	117	70.9% <i>70.9% of all overlays</i>	0	0%	165	100%
Non Res	16	59.3% <i>59.3% of all overlays</i>	11	40.7% <i>40.7% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	64	33.3%	128	66.7%	0	0%	192	100%

Total Juveniles:	1
Animals Harvested:	64

Total Resident Hunters = 165 (86%)

Total Nonresident Hunters = 27 (14%)

Nonresident Harvest = 16 of 64 (25%)

Interim Reports GS000 Sheep - Year 2013 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	26	17% <i>17% of all overlays</i>	127	83% <i>83% of all overlays</i>	0	0%	153	100%
Non Res	9	39.1% <i>39.1% of all overlays</i>	14	60.9% <i>60.9% of all overlays</i>	0	0%	23	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	35	19.9%	141	80.1%	0	0%	176	100%

Total Seniors:	1
Animals Harvested:	35

Total Resident Hunters = 153 (87%)

Total Nonresident Hunters = 23 (13%)

Nonresident Harvest = 9 of 35 (26%)

Interim Reports GS000 Sheep - Year 2014 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	21	17.6% <i>17.6% of all overlays</i>	98	82.4% <i>82.4% of all overlays</i>	0	0%	119	100%
Non Res	10	50% <i>50% of all overlays</i>	10	50% <i>50% of all overlays</i>	0	0%	20	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	31	22.1%	109	77.9%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	31

Total Resident Hunters = 119 (83%)
 Total Nonresident Hunters = 20 (17%)

Nonresident Harvest = 10 of 31 (32%)

26C

Interim Reports GS000 Sheep - Year 2010 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	42	47.7% <i>47.7% of all overlays</i>	46	52.3% <i>52.3% of all overlays</i>	0	0%	88	100%
Non Res	24	88.9% <i>88.9% of all overlays</i>	3	11.1% <i>11.1% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	66	56.9%	50	43.1%	0	0%	116	100%

Animals Harvested:	66
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Total Resident Hunters = 88 (77%)
 Total Nonresident Hunters = 27 (23%)

Nonresident Harvest = 24 of 66 (36%)

Interim Reports GS000 Sheep - Year 2011 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	62	52.1% <i>52.1% of all overlays</i>	57	47.9% <i>47.9% of all overlays</i>	0	0%	119	100%
Non Res	22	81.5% <i>81.5% of all overlays</i>	5	18.5% <i>18.5% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	84	57.5%	62	42.5%	0	0%	146	100%

Total Juveniles:	3
Animals Harvested:	84

Total Resident Hunters = 119 (82%)
 Total Nonresident Hunters = 27 (18%)

Nonresident Harvest = 22 of 84 (26%)

Interim Reports GS000 Sheep - Year 2012 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	45	45% <i>45% of all overlays</i>	55	55% <i>55% of all overlays</i>	0	0%	100	100%
Non Res	25	64.1% <i>64.1% of all overlays</i>	14	35.9% <i>35.9% of all overlays</i>	0	0%	39	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	70	50%	70	50%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	70

Total Resident Hunters = 100 (72%)
 Total Nonresident Hunters = 39 (28%)

Nonresident Harvest = 25 of 70 (36%)

Interim Reports GS000 Sheep - Year 2013 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	51	41.8% <i>41.8% of all overlays</i>	71	58.2% <i>58.2% of all overlays</i>	0	0%	122	100%
Non Res	26	81.3% <i>81.3% of all overlays</i>	6	18.8% <i>18.8% of all overlays</i>	0	0%	32	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	77	49.7%	78	50.3%	0	0%	155	100%

Total Juveniles:	1
Animals Harvested:	77

Total Resident Hunters = 122 (79%)
 Total Nonresident Hunters = 32 (21%)

Nonresident Harvest = 26 of 77 (34%)

Interim Reports GS000 Sheep - Year 2014 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	43	43.4% <i>43.4% of all overlays</i>	56	56.6% <i>56.6% of all overlays</i>	0	0%	99	100%
Non Res	22	62.9% <i>62.9% of all overlays</i>	13	37.1% <i>37.1% of all overlays</i>	0	0%	35	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	2	100% <i>100% of all tickets</i>	0	0%	2	100%
Total	65	47.8%	71	52.2%	0	0%	136	100%

Total Juveniles:	1
Animals Harvested:	65

Total Resident Hunters = 99 (74%)
 Total Nonresident Hunters = 35 (26%)

Nonresident Harvest = 22 of 65 (34%)

4 House Resources Committee testimony, March 11, 2013

Complete Testimony of BOG Chairman Ted Spraker
House Resources Committee Hearing
HB 158 – DNR Guide Concession Program
March 11, 2013

“Mr. Chairman I am here today representing the Board of Game to discuss and share some of the challenges – and you’ve heard a lot of them already today - that the Board of Game will face if some sort of guide concession program to regulate the numbers of guides and the moving around of guides throughout the state is not implemented.

But I do want to make it very clear that I’m not here today to discuss the finer points of this project. You know, we look at the conservation and so forth, we’re not looking at the budgets or the areas or how these programs are laid out, we’re just looking at the resource.

And we have two major concerns; in fact we have written three letters of support to DNR since I’ve been on the board supporting some sort of limit to the number of guides and their ability to move around the state. And the reason we have supported it with three different letters, there’s two reasons, one is conservation of the resource and the 2nd concern the Board of Game has – and we’ve addressed this quite a bit – is crowding. And we feel that under the current system where there is no limit to the number of guides that can operate on state and BLM-managed lands, this has resulted in some fairly heavy generally localized overharvest of game and certainly crowding.

And I want to give you just a little bit of experience from the Board of Game. Every meeting that I’ve attended since I’ve been on the board – and I started in January of ’03 – there’s been proposals requesting some sort of reduction in harvests by nonresidents. And it first pretty much started, and in the last couple terms that I’ve been involved in it, it’s been surrounding sheep harvests. Primarily competition and overharvest and so forth of legal rams for sheep hunting. But now we have proposals and it’s spread to all big game, we’ve got proposals ahead of us now that deal with some sort of reduction in nonresident take for all big game, so that has changed.

And the requests come in basically two forms. First, proponents of these or offerers of these proposals would like to first eliminate all nonresident hunters; that’s a common statement, or at least stagger the opening season dates. We commonly see that in proposals to give the residents a five day or seven day head start before any nonresident hunter is allowed to hunt. The second kind of level of proposals that we get are to only allow nonresident hunting by limited drawing permits. And usually there’s an allocation assessed with these proposals, and it’s usually around 10%.

And I went through the recent supplement for drawing hunts and I looked at all the hunts and just struck them down to 10%., and that’s quite and exercise but I would encourage you if you’re interested in this to look at it. That’s huge. That would really

make a difference. You've heard a lot about the financial benefits of nonresidents, you know the Board doesn't really look at all the financial parts of it, we look at the conservation. But we understand those things. And this 10%, if that was approved by the Board, would be absolutely huge as far as money coming into our state that go to the Department of Fish & Game for managing our game.

The second thing that we are really faced with is this crowding issue, and I want to give you just a couple of quick examples. We've talked a lot about the Palmer to Glenallen area, 13D/14A, this is south of the Glenn Highway. And as I said we had 36 to 38 guides that were operating in this area. What the Board did, because we had several proposals to address this, we convened kind of a town hall meeting. And the room was full. We had guides, we had a lot of resident hunters there that were interested in sheep hunting. We had a very good discussion. And what was interesting to be because I realize how guides have such difficulty with their financial plan and stability when you go on permits. Knowing that, what really interested me is, all but one guide – and there were probably 8 or 10 guides in the room that operated in this area – all but one guide said, we've had enough, competition is so fierce in this area we can't offer a quality hunt, there's very limited chance for success for our clients, and we just can't compete at this level anymore. We would rather have permits, and then the quality goes up, the size of the ram goes up, we have more sheep to look at, the conservation part's addressed, and mainly the crowding issue is addressed. We've seen examples of that.

Another area the Board of Game is looking at, and I'm sure this is going to come up fairly soon, we've got a meeting in Fairbanks 2014 in the spring, and this is south of Fairbanks, 20A, there's currently about 15 guides registered for this area. And from what I hear from other guides – I'm not a guide – but what I hear from other guides around the state is that the area can probably support about a third of that number and have some really quality hunting, so that's another area we're going to have to deal with, And here's something else that I'm really concerned about. Is that, there's a difference in having guides competing with guides, that's one issue, but the way I look at it as a BOG member, and a real state's rights sort of guy, is that this really puts a lot of competition on residents. Because guides are well equipped, they have large camps, wall tents, a string of horses, aircraft, they're set up, I mean this is their business. For your average hunter that goes in there for a long weekend or a week or whatever, those guys, those residents have a tough time dealing and getting game in places where you have a lot of guide competition.

Another area, and Deputy Commissioner Fleener referred to this one as well, is 19C, it's over west of the Denali National Park, and in this area it's primarily competition between guides. And we've heard this from several guides. One guide that I know personally that works in this area said that the competition is building. I think part of that may be because of what the Board did down in 14A and 13D, I think we probably pushed some of these guides over into that area. And again, when you have an area that's fully utilized, and when you're sheep hunting the areas of access and landings strips and so forth, regardless of how good of a super cub driver you might be, they're limited, there's a finite number of places you can access these sheep areas, And if the guides are

operating all of those, and they're usually there the full season, again it really impacts the number of residents that hunt in that area.

My last example on that series is we have our next BOG meeting, starts Friday in Kenai, and before us we have 53 proposals. We have 9 proposals addressing some sort of competition, overcrowding, overharvest or whatever, and this competition between residents and nonresidents. And that ratio is not uncommon in the last four or five years I've been on the Board. So there's a lot of concern.

Mr. Chairman, in summary, just a few points.

The Big Game Commercial Services Board licenses about 15 to 20 – some years even more than that -- new registered guides each year. And in the Board's opinion, we just don't have enough state land to accommodate that level of growth without additional hunting restrictions. And here's the concern of the Board again.

These new guides probably will not be able to compete successfully with established guides in the area. But I'll tell you who these young guides, and very ambitious guides can compete with, are residents of the state. And again, as we add more new guides, and we don't have some sort of limit on the number of guides or how large an area they can operate in, I think it spills down to the residents and really impacts the residents and their ability to take game.

Another concern we have of course is if this plan or some sort of plan is not implemented, the board will be obligated to address what we usually call hotspot hunts. Representative Wilson brought up this point about, why don't you just fix some of these areas – what the Board has run into is that what the board has run into is that if we fix an area over here, what we do is we push the problem over there. And we're pretty handy at doing that under this system because we recognize hotspot issues. We've done this kind of a piecemeal sort of operation and I think the BOG has pushed some of these problems to other areas, whereas if we had some sort of global approach I think it would be a lot better. Better for nonresident hunters through guides and certainly better for residents.

Mr. Chairman, my last point, or just concluding statement is, I think that by adopting some sort of system to regulate the guiding numbers, and would address this conservation and crowding, we're going to greatly benefit not only the future and stability of the guiding industry – I think that is paramount here – but I think it's really going to make a difference in the hunters that are residents of the state, and benefit the residents. I see a lot of – and I've looked at this fairly carefully – I see a lot of benefits from this sort of regulation to resident hunters in the state, especially when it comes to places that are really popular for moose hunting and popular for sheep hunting.

Mr. Chairman, with that I'll conclude and I'll do my best to answer any questions."

⁵ Joint Boards Criteria for Development of Board-Generated Proposals

2013-34-JB

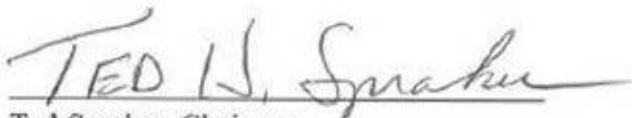
ALASKA JOINT BOARDS OF FISHERIES AND GAME

CRITERIA FOR DEVELOPMENT OF BOARD-GENERATED PROPOSAL

It has been suggested that criteria need to be established to guide the Alaska Joint Boards of Fisheries and Game, Board of Fisheries, and Board of Game (boards) members when deliberating on whether or not to develop a board-generated proposal. The boards will consider the following criteria when deliberating the proposed development and scheduling of a board-generated proposal:

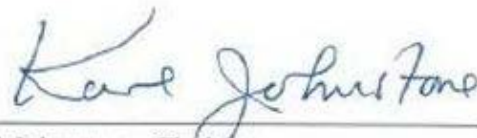
1. Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?
2. Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?
3. Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?
4. Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)?

Findings adopted this 16th day of October 2013.



Ted Spraker, Chairman
Alaska Board of Game

Vote: 6-0



Karl Johnstone, Chairman
Alaska Board of Fisheries

Vote: 7-0