



ARIZONA DESERT BIGHORN SHEEP SOCIETY, INC.

P.O. BOX 21705

MESA, ARIZONA 85277

(480) 854-8950 • (480) 854-8966-fax

www.adbss.org

February 27, 2024

Arizona Game and Fish Commissioners
C/O Chairman Todd Geiler
5000 W Carefree Hwy
Phoenix, AZ 85086

RE: Potential Changes to the Special Big Game Tag Program

Chairman Geiler and Fellow Commissioners,

The Arizona Desert Bighorn Sheep Society (ADBSS) has been at the forefront of bighorn sheep conservation in Arizona since our incorporation in 1967 and collectively we have a significant amount of experience with the Special Big Game Tag (SBGT) program. We were instrumental in setting up the first Arizona Special Big Game Tag sale in 1984 by establishing the program with ARS 17-346 and have been involved in it every year since. Initially the SBGT program established the sale of two desert bighorn tags. In subsequent years the program was expanded to include other big game species with two tags each. Twenty years later the statute was revised to provide for an additional tag, or three special tags total, for each species, allowing for the birth of the Super Raffle program. Few could argue that the program has not been wildly successful in raising funds for all Arizona big game species and increasing wildlife populations and hunting opportunities across the board.

Over the last twenty years the SBGT program has raised more than \$9.6M for bighorn sheep conservation and management in Arizona. Of that total \$6.8M was raised through auction sales and \$2.8M through raffle sales resulting in a fundraising effectiveness ratio of more than 2:1 in favor of auctions. In more recent years that ratio has approached or exceeded 3:1. During the last 5 years (2019 -2023) auction sales have raised \$2.56M for an annual average of \$512K while raffle sales have raised \$790K for an annual average of \$158K. With the recent in-state raffle sale restrictions implemented in 2023 the effectiveness of raffles is on a sharp downward decline and only raised \$89,500 for bighorn sheep last year. The bighorn sheep SBGT program cannot afford to additionally lose upwards of \$300K per year by now also eliminating auction tags.

It is for these reasons that the Arizona Desert Bighorn Sheep Society is strongly advocating that we retain the current program in its current form and take a slow and more measured approach to changing anything. Our organization is not opposed to change and the pursuit of other fundraising ideas, but they must be viable and shown to be better or at least on par with the current program. We have spent the last year exploring a wide array of alternatives, looking for viability, sustainability, and efficiency, and none have demonstrated the fundraising effectiveness that an auction tag provides. Bighorn Sheep, while certainly not the only animal on the landscape, are unique in many ways and are deserving of special attention requiring significant funding resources. As advocates for bighorn sheep in Arizona there are several points that need to be carefully considered by the commissioners before upsetting the current program:

1. A myriad of evidence has proved that more funding equates to more sheep and more sheep hunting opportunities for all. Since the SBGT program's inception the number of sheep hunting opportunities has increased by nearly a factor of four, from forty-four tags in 1984 to 157 tags in 2023. Conversely, less funding will eventually lead to lower sheep numbers and less hunting opportunity.
2. Bighorn sheep numbers are small in comparison to other big game species, but they require an incredible amount of funding for their care. The Department, over the past 5 years, has spent \$3.3M in HPC funds alone for bighorn sheep conservation and management needs. A recent WAFWA study showed that 96% of the total funds needed for bighorn sheep management in Arizona comes from SBGT funds or the federal match they provide. Any decrease in SBGT revenue is therefore certain to negatively affect bighorn sheep conservation and their numbers.
3. Annual revenue from bighorn sheep tag sales is less than \$75,000 per year and only a small fraction of what is required annually by the Department to support bighorn sheep conservation and management activities in the state. Translocations, disease testing, water catchment construction, maintenance, water monitoring and aerial water hauling by helicopter are just a few of the many costs the Department needs to be covered every year.
4. Bighorn sheep are extremely susceptible to massive die-offs from diseases introduced by domestic livestock, more so than any other species managed in the State of Arizona. The Department efforts required to recover a bighorn sheep population that has been impacted by a die-off is much greater than the other species.
5. Arizona bighorn sheep populations have been used to start and/or support bighorn reintroductions or augmentations to existing populations in the states of New Mexico, Utah, Nevada, and Texas. If there are significant bighorn sheep die-offs and the Department funds are not available to support recovering bighorn populations, more than just Arizona sheep populations will be impacted.
6. Bighorn sheep populations have been impacted by urbanization. We have seen habitat fragmented by pipelines, freeways, canals, and new development. The extended period of drought has also added stress to bighorn sheep populations. The habitat they live in is unique and remote. The adaptability to changes in their environment is less than that of elk, deer, mountain lion, javelina and turkey.
7. We cannot afford to experiment with the funding of bighorn sheep management, and it should not be subjected to unproven experimental SBGT fundraising ideas. It is our belief that special bighorn sheep tags should be the very last tags to be experimented with due to their unique issues and needs.
8. The notion that other proven alternatives exist is simply not true. The alternatives that have been repeatedly mentioned have all been carefully considered and found to not be viable in the context of replacing the funds from a bighorn sheep auction tag. The Big Game Hero competition was a one-time high-risk endeavor that subsequently revealed that it was about as far from a fair and equitable competition as you could get and was not sustainable. The Jaws and Paws raffle, at only \$60K, is nowhere near the scale that is required to replace more coveted special big game tags and especially bighorn sheep. Other state raffles are clearly not in compliance with Arizona gaming laws. And other tricks and games to incentivize raffle sales are only viable in the context of lower demand raffle products.
9. Any commissioner concerns with the way auction tags are sold and conveyed could easily be addressed by tightening up your requirements for issuance of the tags. There is no justification to abandon the auction

tag program because of these suspicions or fears as there are more practical solutions available. For example, you could make the tag non-transferrable and/or require the designation of the tag holder within a much shorter period of time, or control eligibility requirements by putting a stipulation in that does not allow a winner to be eligible for the following year.

10. Some concerns have also been raised that a high percentage of successful auction buyers have bought multiple tags over the past several years. Please note that several people have also won multiple raffle tags as well through the Super Raffle over the course of its history by purchasing large blocks of tickets ranging from \$10K-\$30K. Eliminating auctions tags will no doubt increase this occurrence with raffles as past auction buyers compete to obtain these same tags through a raffle process instead of an auction.
11. Any contempt over auction tags should be tempered with the realization that 100% of the funds they raise goes back to the Department for the benefit of the species for which it was raised and creates more hunting opportunity for all. **If that is still not palatable a compromise could be reached by changing the statute again with the issuance of an additional SGBT tag per species. That might afford us the luxury of experimentation without jeopardizing the reliable revenue that presently only auctions tags can provide.**
12. Ranching and landowner relations have been improved with the use of HPC funds and associated on-the-ground projects. The reduction in HPC funds is certain to affect those landowner relationship programs.
13. The number of projects funded by the HPC process supports a substantial number of volunteer opportunities that are leveraged by the department to cover other in-house costs...like staff, trucks, tools, and fuel. These funded projects also provide many youth opportunities and are critical towards maintaining the regeneration of youth into the wildlife conservation movement. Any loss in HPC funds is certain to affect volunteer opportunities and have lasting consequences.
14. Bighorn sheep SGBT funds have been used in the past to build new and rebuild existing water developments. Many of these developments have been done in marginal sheep habitats, but they have significantly benefited other wildlife species while helping with bighorn sheep management (5 new waters in Region II for example over the past five years). The waters completed not only benefit big game species but other animal species including bats, birds, insects, amphibians, etc.
15. The non-consumptive public is sure to also be impacted if bighorn sheep populations decline or are compromised because of reduced funding. For example, the Catalina Mtn. and Salt River Lake system populations were extirpated, subsequently reestablished, and maintained with a tremendous amount of effort primarily funded by SGBT funds. The public enjoys viewing bighorn sheep while on hikes and recreating in their habitat, but few know of what it costs or the funding source to get and keep them there.
16. The ADBSS is happy and honored to contribute approximately \$20K a year towards the marketing and sale of auction tags as this allows us to also participate in the Habitat Partnership Committee with a diverse array of stakeholders and providing the backbone to the SGBT program. Removing auction tags will not only reduce funding but will also result in reduced stakeholder participation. Dispelling any myths to the contrary, the ADBSS also regularly contributes upwards of \$120K annually in private funds in support of the Department's needs and towards other bighorn sheep conservation activities. We are also often the lead organization used to fund a defense to any anti-hunting measures and other threats to the Department.

17. Commissioner or private individual misgivings or concerns relative to auction tags and the North American Model of Wildlife Conservation should be addressed by the Department with a focused and intense public information campaign. It is not enough to upset this apple cart because of the limited few that may have a different opinion. Countless numbers of nationally recognized experts and organizations have weighed in on this matter in favor of the current and extremely limited program.
18. Modify existing U.S. and interstate state raffle laws to allow for interstate online purchases before making a change to the existing processes.
19. Too little money is available to fund adequate bighorn sheep and other wildlife management, and most everyone involved in wildlife management is trying to find ways to raise more money, not less.

On behalf of the ADBSS Board of Directors, and nearly 1,000 members, please consider these matters as you balance the equality of opportunity and the funding needs of the wildlife species that are being managed by the Department. You are all stewards of Arizona wildlife. You all take your responsibilities seriously as they relate to managing both human social ideals against the needs for wildlife management. We implore you to do the right thing and as bighorn sheep advocates, we ask you to keep the existing structure of the Special Big Game Tag program in place.

Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads "T.J. Baehre". The signature is written in black ink and is positioned to the left of the typed name.

T.J. Baehre
2024 ADBSS President