

March 19, 2023

To the Members of the Board of Game:

Please reject Proposal 204 due to its illegality per Constitutional requirements, its failure to justify a biological concern, its ignoring the robust nature of full curl regs to protect sheep populations, its thinking it more appropriately can discern a conservation concern than the professionals in the Department, and for the arbitrary nature of the proposal in ignoring the fact that Doug Vincent-Lang is the manager of our wildlife resources. If there is a concern it should come from his staff. Proposal 204 has no legitimate place and should be rejected for the above reasons.

Proposal 204, a Board-generated proposal, rather than one from the public, arbitrarily intends to reduce Dall sheep hunting opportunities in GMU 19C. While clearly well-intentioned, Proposal is not only arbitrary but also emotionally-driven and totally ignores any science or the Department's professional biological position in the matter. The Department has not declared a conservation concern in 19C, so why is this draconian proposal being presented without any proof of a biological problem? The biologists on the ground are the experts, we should let them do their jobs, and if and when they deem a conservation concern exists, then the Board can take up the matter at that time.

It is important to remember that the Constitution says the Commissioner is the manager of wild game. This proposal attempts to usurp that management authority from Commissioner Vincent-Lang without any data to support such an action. Indeed, this proposal is in violation of the first four paragraphs of Article 8 of the Alaska Constitution.

A few years ago, Joe Want of Fish and Game found, based on many years of sheep harvest data, that on average only about half of the KNOWN legally harvestable rams are taken every year. That means that we annually underharvest legally available rams in all hunted GMUs. And it is common that even when surveys are done, many sheep are missed, and numbers are normally higher than a survey shows. Moreover, based on a full curl harvest regime which has been shown to be self-protecting to the population over many decades across the state, any restriction to hunting in GMU 19C therefore is not only biologically unnecessary but lacks any scientific support to justify the passing of Proposal 204.

Dall sheep are the epitome of adaptability having survived repeated glaciations and tropical warmings in Alaska over several millenia. To suggest or presume that the sheep of 19C are in desperate straits such that we should, despite no indication of a conservation concern, close all hunting is not rational and ignores the ability of the natural adaptability of Dall sheep but also the full curl harvest regulations to protect Dall sheep populations. Even when populations are lower than they have been in the past, closing hunting is not a biologically-based action and won't provide a quicker rebounding of population numbers than simply with the self-protecting full curl regs in place.

Submitted respectfully,

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