

Hello members of the board. You can find my public comments as submitted in PC37.

My name is Josh Ellis, I live in Anchorage and I am a third generation born and raised Alaskan. I am a long time resident hunter, as well as a registered guide since 2016.

First of all, I'd like to thank the board for their efforts and contributions to the wildlife and the many hunters that rely on Alaska's wildlife for food, culture, and recreation. I think your position as a board member could sometimes be called a thankless job considering the acrimony you often take from the public and the various interest groups. I also have one of those thankless volunteer jobs in the hockey world as the referee in chief for the state of Alaska, so I can kind of relate.

I came here today to offer testimony on a couple proposals, specifically one that would directly affect myself and negatively affect my small business. This is proposal 130, which I steadfastly oppose. This proposal, in brief, aims to change the drawing permit allocation for the Delta Sheep hunts and combine the resident and non-guided resident pools into one.

Currently, I am one of the guides mentioned in this proposal offering sheep hunts in the Delta. Just to provide some background, I obtained my registered guide license in 2016. While some newly registered guides choose to run out and start their own operation immediately, I chose not to as I didn't feel it would be ethical to crowd into other guides and I wanted to wait to start my own outfit until I was certain that I could offer clients quality hunts without stepping on others toes.

When the delta sheep hunts changed the way the permits were allocated a couple years back with the introduction of the DS205 permit, this gave me and a couple other small operators a reasonable opportunity to obtain permits for clients and offer high quality sheep hunts, and therefore I was able to start offering my own sheep hunts as opposed to working for other outfitters.

By maintaining the current 90/10 allocation, this structure allows guides to reliably operate in the DCUA with a certain reasonable expectation of non resident clients obtaining a permit. Currently, only two small outfitters are operating sheep hunts in the DCUA. The current allocation structure has allowed these two outfitters to offer high quality sheep hunts to their clients and maintain their business. If this proposal is passed, it would in turn make their businesses unsustainable when it comes to providing quality sheep hunts to non-resident hunters. It would also disadvantage residents and their current

odds of drawing a permit as non residents and outfitters would have to enter many more applicants into the combined pool in the hopes of their clients obtaining a permit.

The common use clause of the Alaska State Constitution provides that *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The Alaska Supreme Court found in the 1988 Owsichuk decision that this common use clause also includes guides and their access to these wildlife resources. The current allocation (90/10) of sheep permits in the Delta sheep hunts is more than fair to both the residents and non-resident applicants, and provides guides and outfitters their constitutional protected access to the wildlife resources as defined under the common use clause and affirmed in the Owsichuk decision.

Every sheep drawing hunt in the state is allocated at either 10 percent non residents (TMA), and/or the non resident guided hunters have their own separate pool from the residents. If this proposal were to be adopted, it would be the outlier and inconsistent with the rest of the statewide drawing hunts for sheep, and would be the only sheep draw in the state that doesn't follow suit.

I am not sure why the proposing AC of this proposal feels this ratio of allocation is inappropriate. A resident sheep hunter just provided impassioned testimony that all they want is a fair ratio in allocation, I would argue to this board that the 90/10 allocation is more than fair in the allocation of Delta sheep tags.

I support the proposal for predator control in the TMA

I support proposal 131

Opposed to proposal 186