

[Slide 1] Good afternoon Mr Chairman and members of the board, Department staff, my name is Mark Richards, I'm the executive director for Resident Hunters of Alaska, RHAK, and will be speaking today in support of our proposal 267 on behalf of our 3000 + members from across the state.

[Slide 2] Proposal 267 asks to limit nonresident sheep hunters in Unit 19C in the western Alaska Range to draw permits with a limited allocation of 30 permits. This was an Agenda Change Request, ACR 4, accepted by the Board to hear out of cycle at this meeting. Department comments on ACR 4 in this slide stated that "existing regulations are contributing to the decline in sheep populations in Unit 19C."

[Slide 3] This slide shows the Department comments to a similar ACR, ACR 3, that was submitted to the board in 2020, but rejected, from a contracting guide with 20 years of guiding experience in 19C asking for a moratorium on all sheep hunting for two years based on the steep declines in the sheep population. That guide has since moved on to guide for sheep in the Wrangells.

[Slide 4] This next slide shows a timeline of Department comments regarding the 19C sheep population. In late 2020 the Department said there "MAY BE" a biological concern for the sheep population, then closed the winter hunt because of a definitive biological concern. Late 2021 the Department stated that the existing regulations are contributing to the decline in the 19C sheep population, then in their comments on our proposal, which garnered a LOT more attention than the ACR, they say that the declines are strictly weather related. I mean no disrespect to the Department and staff but it does seem politics is getting way too much in the way of what should be a matter of just letting the area bios and supervisors say it like it is, and from there we go to adhering to our statutes.

[Slide 5] This slide references our subsistence statute. The Department completely shut down the subsistence sheep hunt in RY 20 and restricted that hunt in RY 21 based on biological concerns, but there still has been no restrictions on nonresident sheep hunters. This runs contrary to the guidelines in AS 16.05.258 requiring that other uses be restricted when the harvestable surplus is insufficient to provide for all uses. We can't have the fallback position be one where the Department can use their Emergency Order authority to shut down the sheep

season for all if deemed necessary, when we have unlimited nonresident hunting that is taking the vast majority of the harvest.

[Slide 6] RHAK submitted a similar proposal at the last Region III meeting, proposal 52, to place limits on nonresident sheep hunters in Units 19C and 20A, which was heard by this board and voted down in the spring of 2020, 8 months prior to the Department closing the winter subsistence hunt in 19C based on biological concerns.

Our concerns all along have been that what happened in the Chugach would happen in these other units that are on state lands where we allow unlimited nonresident opportunity and have no limits on the number of guides. That the Department would eventually say they have conservation concerns and then this board institutes draw only hunting for all, or a complete closure, and residents lose general sheep hunting opportunities again when all along it is the nonresident component harvesting the vast majority of the rams.

[Slide 7] This slide shows some of the opposition to proposal 267.

The thing that gets me now, is saying this proposal has nothing to do with conservation and is only about allocation. That flies in the face of Department actions in closing and restricting the subsistence hunt and statements that they have biological concerns for the sheep population.

We don't disagree there will be fewer dollars going to the Dept and to some guides if this proposal were to pass. Surely an EO closure by the Department, a draw hunt for all in which nonresidents get 10% of the permits, or a complete moratorium on sheep hunting opportunity, would have even worse impacts. We can't put our foot on one side of the scale to weight wildlife management and allocation decisions more heavily on the money coming into the state and to guides from nonresidents. That certainly would not comply with the directives in our state constitution.

[Slide 8] Speaking of our state constitution, I think this is a perfect quote outlining how we should appropriately manage our wildlife and allocations from Commissioner of Fish & Game, Doug Vincent-Lang: "My number one goal, as mandated by Alaska's constitution, is to deliver to the people of Alaska the

maximum use and benefit of fish and game resources while ensuring a sustained yield for future generations.”

That is exactly the foundation of RHAK and why we formed. Sustainable wildlife management policies geared toward protecting the resource and prioritizing resident hunting opportunities.

[Slide 9] The bottom line is that sheep across the state are hurting, the climate is changing and so is sheep habitat, we can't control the weather and really no means to control non-human predation. Sub-legal harvest increased substantially this past fall, evenly split among guided and unguided hunters.

I mean, when we have guides who've operated in the unit for 20 years saying things are so bad we should shut the entire season down for two years, a closure of the subsistence hunt, it's past time to just watch and see how it plays out. The only thing we can control is how many sheep are killed by hunters, and we know the group that is killing the vast majority of the sheep are nonresident hunters.

The boards nonresident allocation policy states that the board will determine allocations based on the historical data of nonresident participation and harvests over the past ten or more years. For 20 years now nonresidents have made up the majority of sheep hunters in 19C and taken the majority of the harvest. To base any future nonresident allocations on this policy is nonsensical in terms of dealing with 19C nonresident hunting allocations.