

Mark Richards RHAK Testimony
Board-generated Proposal 204
Region II Southcentral Board of Game Meeting
March 19, 2023

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Board-Generated Prop. 204 – Close all sheep hunting in Unit 19C for 5 years

Dozens of proposals since 2008 asking to limit nonresident sheep hunters in Unit 19C.

Common theme of proposals to limit nonresident sheep hunters in Unit 19C: **Declining sheep population, crowding and conflicts, and concerns resident sheep hunters would eventually lose opportunity if nonresident sheep hunters were not limited.**

Board votes down every proposal over past 15 years to limit nonresident sheep hunters in Unit 19C.

Rationale of Board decisions *not* to limit nonresident sheep hunters: **FC harvest strategy sustainable under all conditions, loss of revenue to Dept & guides**

For over a dozen years now, the public (including RHAK since our formation in 2016) has been submitting proposals to this board requesting limits on nonresident sheep hunters in Unit 19C, expressing concerns over sheep population declines, crowding and conflicts in the field, and fears that if nonresident sheep hunters were not limited, residents would eventually lose opportunity just like they did in the Chugach.

The board voted down every single proposal to limit nonresident sheep hunters, based on the Department position that the full-curl selective harvest regulation was sustainable under all conditions. Everything else, the known crowding and conflicts in

the field, nonresidents taking the vast majority of the sheep harvest each year, took a back seat to professed concerns that limits on nonresident sheep hunters would decrease funding to the department too much and result in less income to guides.

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The known problem:

- **Unlimited nonresident sheep hunting opportunity allowed by the Board of Game in certain areas**

But the board wanted more information:

- **Dr. Todd Brinkman (UAF) Sheep Survey (2014)**
- **Dall Sheep Working Group (2015/2016) facilitated by Dr. Alistair Bath**

Over \$300,000 spent on Brinkman sheep survey and Sheep Working Group to find out what we already knew:

- **“Residents should have a priority to sheep hunting.”**

The problems surrounding sheep hunting in some areas are not new and have always revolved around unlimited nonresident sheep hunting opportunity allowed by this board.

But this board said they needed to gather more concrete data from the public. So, they commissioned a sheep survey in 2014 conducted by Dr. Todd Brinkman from UAF. Then after that they formed a Sheep Working Group comprised of different stakeholders, organizations, and guides.

I was on that sheep working group. It was facilitated by Dr Alistair Bath, who told us all the first day that he had worked with and facilitated group meetings across the world on wildlife issues, even including a group of Palestinians and Israelis, and that every single group had always reached 100% consensus. That’s how good he said his process was.

The Sheep Working Group had a membership that was 25% guides and was, and still is, to absolutely no-one's surprise, the only group facilitated by Dr. Bath that did not reach a 100% consensus on any solutions.

The group did agree that residents should have a sheep hunting priority, for whatever that's worth.

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Board of Game changes narrative:

- **The problem is not unlimited nonresident sheep hunters; it's unlimited guides that those nonresident sheep hunters are required to hire**

Board solution:

- **Guide Concession Program on state lands to limit guides that cost > \$200,000 to study and draft legislation, including a meeting for nonresident guides in the lower 48, soundly rejected by legislature. Would result in same loss of revenues to Department and loss of income to guides that the board uses as excuse NOT to limit nonresident sheep hunters!**

Stalling tactic by the Board to:

- **Avoid limiting nonresident sheep hunters to draw-only permits**

Since 2008, this board has played a stalling shell game. First, it was that we needed more studies and a sheep working group. Then, we were told the problem was not unlimited nonresident sheep hunters that they authorized year in and year out, it was too many guides who those unlimited nonresident sheep hunters were required to hire. So, in conjunction with the guide industry and the Big Game Commercial Services Board that ostensibly regulates guides, they pushed this convoluted Guide Concession Program on state lands to limit guides, which itself cost more than \$200,000 of state money to fund meetings, develop a plan and draft legislation to propose to the legislature, which never even made it out of committee. Just last year, the guide board admitted the past guide concession program was unworkable and

are now in the process of again holding meetings for a new guide concession program.

The problem is, and always has been, this board allowing unlimited nonresident sheep hunting in certain areas, which itself leads to unlimited guides.

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Most recent proposal to limit nonresident sheep hunters in Unit 19C: **RHAK Agenda Change Request (ACR) #12, 2022 Board of Game ACR Meeting**

Rationale RHAK ACR 12 meets criteria for acceptance: **Known sheep conservation concerns in the unit expressed by the Department and Board, closure of the RY 2020 winter subsistence sheep hunt by Department**

Board of Game unanimously votes down RHAK ACR 12, stating that: **It does not meet criteria for acceptance, is purely allocative in nature; FC selective harvest sustainable, no Dall sheep conservation concerns in Unit 19C**

Rationale for board-generated proposal 204, introduced and approved at the 2022 ACR meeting just after voting down RHAK ACR 12: **Conservation concerns for the Dall sheep population in 19C!**

This past November, the board deliberated on an Agenda Change Request from RHAK, ACR 12, asking yet again to limit nonresident sheep hunters in Unit 19C to draw only permits with a limited allocation. (I wrote an op-ed for the Anchorage Daily News on this that was out this past week, which is RC) Our ACR highlighted known sheep conservation concerns under criteria 3, and the closure by the Dept. of the winter subsistence sheep hunt in RY 20 under criteria 4.

This board, all of you, voted down our ACR 12 unanimously on the grounds that there were **no conservation concerns** for the sheep population.

Shortly after you voted down RHAK ACR 12, there was a motion from member Hoffman to draft a board generated proposal to

completely close unit 19C to all sheep hunting for five years. I was dumbfounded...what could such a motion be based on if the board had no sheep conservation concerns?

Unbelievably, member Hoffman stated that his motion to create a board-generated proposal to close down all of Unit 19C sheep hunting for five years was based on...wait for it...conservation concerns for the sheep population! And even more unbelievably, six of you voted for it so it would end up here at this meeting as proposal 204.

This is a perfect example of why we get so frustrated with this board! This board clearly, blatantly, did not follow your own policy on ACR acceptance in denying RHAK ACR 12, instead you manipulated the public process to ensure that only one option was before the public at this meeting, a complete sheep hunting closure for all.


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RHAK Position on Board-Generated Proposal 204

SUPPORT AS AMENDED to:

- **Close all sheep hunting for nonresidents in Unit 19C for five years**
- **If/when nonresident sheep hunting is again allowed, it is by draw permit only with a strictly limited allocation of permits**
- **No restrictions on resident sheep hunters**

Residents should never bear the brunt of restrictions or closures when the board allows nonresident sheep harvest levels like those seen below

Year	Nonresident	Resident	Total	%Nonresident
2018	79	39	118	67%
2019	75	39	114	66%
2020	54	14	68	79%
2021	34	6	40	85%
2022	26	3	29	 90%

We have submitted comments that support proposal 204 as amended to close only nonresident sheep hunting in Unit 19C. This is the correct move for the board right now that will keep

more sheep on the mountain and ensure that subsistence and resident sheep hunting opportunities aren't impacted.

No doubt amendments will be discussed during deliberations, but no way should any restrictions on resident sheep hunters in unit 19C come out of this meeting, nor should this board continue to allow unlimited nonresident opportunity.

If this proposal should pass, it is imperative that you put in place future limits on nonresident sheep hunting opportunity via draw-only permits with a limited allocation.

In closing, it is absolutely shameful that this board after years of voting down proposals to limit nonresident sheep hunters in 19C would now move to put any restrictions at all on resident sheep hunters, especially after continuing to allow unlimited nonresident opportunity on a known declining population that led to nonresidents taking 90% of the sheep harvest last year.

Thank you to the board, Kristy and board support staff, and Department staff. I'm more than happy to answer any questions.