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Comments on Wildlife Special Action Request WSA 22-02

Resident Hunters of Alaska (RHAK) **opposes** Wildlife Special Action Request 22-02.

Our organization has been concerned with sheep declines across the state and the continued sustainability of sheep populations where unlimited sheep hunting opportunities exist, particularly unlimited nonresident sheep hunting opportunities. We have advocated that unlimited nonresident sheep hunting opportunity allowed by the Board of Game needs to be restricted or limited statewide, in order to better conserve sheep and so that resident sheep hunting opportunities can continue.

40 percent of the sheep harvest in the areas within this closure request is from nonresident sheep hunters and that harvest by nonresident sheep hunters is increasing. We would like to see this addressed by the Board of Game, which unlike the FSB can impose restrictions or limits specifically on nonresident sheep hunters, while still allowing some resident hunting opportunities for non-federally qualified subsistence users.

There is very little actual sheep population data for the areas within this closure request, and most all of the information in support of WSA 22-02 is anecdotal. The public has had very little information available other than the closure request itself. With that in mind, we want to point out that the Alaska Department of Fish & Game's sheep research biologist, Brad Wendling, will shortly be conducting an intensive multi-year sheep research study in the Brooks Range, including the areas within this closure request, that will give us more and better sheep biological data and information. We would like to see this proposal deferred until better information is available to make an informed decision.

If the board should decide to pass this closure request, we recommend it be amended to **not** include the areas within the Dalton Highway Corridor Mgmt area where firearms are restricted. The areas within the Dalton

Highway Corridor management area included in this closure request are popular walk-in sheep hunting areas for bowhunters, and the sheep harvest success for bowhunters is substantially less than with a firearm. For that reason, we don't really see a reason to shut down sheep hunting within the DHCMA.

Also, should this closure request pass, it is going to be difficult for hunters to determine the boundaries of these federal lands and if there is any enforcement presence at all it will be difficult and expensive.

Again, we oppose WSA 22-02 and intend to bring our concerns to the Board of Game, as we believe it is the proper board to address any sheep conservation concerns and the imposition of sheep hunting limits or restrictions among different user groups.