RC 015

BOG on #203—testimony Wayne E. Heimer 1098 Chena Pump Road Fairbanks, Alaska

Dall sheep management in the Western Brooks Range is in a mess. Consequently, I urge the Board of Game to deliberate cautiously on proposal #203. As written it appears to be unnecessarily expansive and reactionary.

As I understand #203, it would make "regular" or "permanent" (till adjusted) the emergency closure (of Fall 2014) of all Dall sheep hunting west of the Dalton Highway.

There are so many irregularities in sheep management there that a thoughtful management plan is needed to bring management there in line with sheep biology, Alaska state policy, the state subsistence law, and regulations compliant with all three guidelines. Covering the entire western Brooks Range with a single management edict is probably a little too "general" to make things work in an ideal manner.

First: The biology of sheep in the western Brooks Range is linked to their geography. Sheep, particularly in the Delong Mountains are on what we should consider marginal or unstable habitats. Ocean weather influencing low/rolling terrain with lack of escape cover makes this population vulnerable to predation in to a greater degree than other sheep habitats. The presence of the Western Arctic Caribou herd (coming down from a high of 500,000) may compete with sheep for critical food. The geography of the habitat (which drives weather) makes it "unstable" at best. Dall sheep are adapted to continental, not maritime climate. Sheep are known to have "come and gone" from this area several times in the past.

So, what did we do with these sheep? We implemented the most high risk management scheme possible, basically "open and unmonitored" subsistence harvests of "any sheep" with long seasons and liberal bag limits, on these beleaguered sheep. Exploitation of these sheep by local users may have been "customary and traditional," and I recognize that if sheep "come and go" from the Delongs, it might make some sense to "shoot 'em when ya got 'em." This is because they're only going to be there when environmental resistance is low. When things get tough, they'll be gone "soon" anyway.

However, that rotational extirpation harvest is inconsistent with the sustained yield principle which is to guide sheep management in Alaska according to our constitution.

Nobody (the state and the feds) has monitored this population adequately to manage the exploitive subsistence harvest on these marginal sheep populations on the sustained yield principle (Article VIII Sec. 4). We have the liberal either-sex sheep hunts because we were told it is customary and traditional for the local residents to hunt ewe sheep. However, examination of both the state and federal subsistence harvest reports indicates killing ewes is very rare. Consequently, reacting to an unusual weather event by shutting down all sheep hunting so the locals won't have to cope with altering an alleged customary and traditional harvest pattern (which no data show continues to exist) seems a bit on the reactionary side to me.

Additionally, the state subsistence law seems to have been ignored in this Region. I believe it says that when sheep are abundant, everyone can hunt. The sustainable biological harvestable surplus is mature rams. Biologically, no harm will come to the population if all legal rams are harvested. Conversely, the harvest of ewes is not sustainable.

I think the subsistence law prescribes that when a subsistence harvest is not sustainable, it should be stopped. That was done in 2014. However, when a harvestable surplus beyond the ewe population exists, those animals are to be harvested on the sustained yield principle. There may be no harvestable surplus of ewes, but still a harvestable surplus of legal rams. First, subsistence harvest opportunities must be shifted to rams (legal or "any" would be better than ewes). If those rams can meet the amount needed for subsistence

(ANS) and legal rams remain, other hunters are allowed to hunt. If there aren't enough legal rams to meet the needs of Alaska residents, nonresidents are excluded. If there still aren't enough, Tier II selection among residents is prescribed.

None of this was done with the emergency closure.

Hence, I urge the Board to do whatever it must to accommodate the biology, policy and subsistence law priorities with these sheep.

Almost every mistake possible has been made here, and I doubt the Delong Mountains are an indicator of the entire Brooks Range west of the Dalton Highway. So, do what you must, but my suggestion is to "keep it temporary" till a rational review of all factors produces a management plan which accommodates biology, policy, and defines regulations appropriate to management of these sheep as prescribed by law.