

203 – Hunting Seasons and Bag Limits for Dall sheep

Closing 23A and 26 entirely for sheep.

- 1) Remove the C&T Finding for harvesting ewes
- 2) To abide by the Subsistence Law amend the proposal to allow the harvest of available surplus full curl rams
- 3) Close the harvest for ewes to provide for sustained yield.
- 4) Create an interagency statewide subsistence sheep harvest reporting system.

The Department's Dall sheep management plans of 1976 said the Western Brooks Range is at best marginal habitat given the arctic coastal influence and cautioned against unmonitored hunts and ewe hunts, uncontrolled harvest situations and hunting outside of season and bag limits. It also says even with good lamb survival it's not likely the population will expand quickly. That was 38 years ago.

With warnings in the plan perhaps unknown to the biologists, and the population's precarious nature in a marginal coastal habitat coupled with the free hunting of ewes, the sheep population became a casualty of the social environment where ewe hunting trumped sustainability. By allowing unmonitored ewe hunts against the good advice of those dusty old management plans and in the face of the biology as we know it, it appears we might be guilty of violating the sustained yield principle.

That we have an emergency closure might suggest an event cascade has led to a pileup of problems which can't quickly be resolved. This situation might speak to the need to follow a more conservative approach to cautiously select harvest actions considering the fragile nature of environmental factors affecting sheep in the Western Brooks Range.

The August closure of hunting in 23 and 26A without first closing hunting to nonresidents and then making the harvestable surplus full curl rams available to state-recognized subsistence users, even if there are only a few, appears to ignore the priorities of the state Subsistence Law. Full curl rams are still a harvestable surplus and can provide food, even if only a few remain.

Because of the emergency closure of hunting in the Western Brooks range, I've been digging up all the subsistence sheep harvest data I can find from every source I can think of that would collect such data. I've gotten records from the Office of Subsistence Management (OSM), NPS, and ADF&G. The USFWS never responded to my request. My intent was to try to build a picture of subsistence sheep harvest over the last ten years to look for trends or anything that would have set off any alarms for problems.

I wanted to also see how prevalent reported ewe harvest was. In my research I've only found records of 15 ewes harvested in ten years which is not biologically significant. The real

question is with an expectation of some degree of under-reporting, how valid are these data? The potential of under-reporting concerns me. Without knowing the harvest or the population numbers, we put the Department in a management-uncomfortable place. This lack of knowledge has resulted in a blanket closure without consideration for the state subsistence law.

Another concern I have is that in tracking down subsistence sheep harvest data, there is no consistency in reporting demographics, format, or geographic areas between agencies. The National Park Service keeps some data for Gates of the Arctic and Noatak Preserve, but it is likely for land within their boundaries only, and not necessarily broken out by GMU. More complete information was received from OSM as their data were broken out by GMU and even by gender. State information for 23 and 26A was also broken out by mountain range but did have ewe and ram numbers, though I was told harvest data is sometimes not freely or timely shared by the federal agencies with the Department, sometimes up to two years later. Data between agencies did not match, so it is difficult to know which data are correct and causes one to wonder what data are being excluded.

Presuming the Constitution applies and the Department of Fish and Game is therefore manager of all wildlife in Alaska, consistent, reliable, and timely Dall sheep subsistent harvest information should be easily available in an easily read and complete format not only for the Department and federal land managers, but also for the public. Availability, consistency, and standard formatting of such a report would greatly enhance the Department's ability to manage. Reporting of subsistence harvested sheep should be mandatory for the same reason. Is there a process to consolidate or at least systematize subsistence sheep hunt reporting?

To put us in a management-happier place I again recommend the following:

- 1) Remove the C&T Finding harvesting on ewes
- 2) To abide by the Subsistence Law amend the proposal to allow the harvest of available surplus full curl rams
- 3) To abide by the Constitution, close the harvest for ewes to provide for sustained yield.
- 4) Create an interagency statewide subsistence sheep harvest reporting system.

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Please choose option #1 – status quo, and have the Department review and update the Dall sheep management plans in-house. I would reiterate these are MANAGEMENT plans, not allocation plans. The Department has the Constitutional mandate to manage, and they have the scientific expertise to marry biology with the Constitution to create updated plans. NO WORKING GROUP should be involved in order to maintain transparency the Commissioner has mentioned the Department will deliver to the public. The Advisory Committees would provide local input for local plans in lieu of a stakeholder working group. Once AC inputs are received, the plans should go out to public and stakeholder input.