



August 4, 2017

Federal Subsistence Board
Office of Subsistence Management
Attn: Theo Matuskowitz
1011 E. Tudor Road, MS-121
Anchorage, Alaska 99503-6199

Chairman Christianson and Members of the Board:

The Wild Sheep Foundation appreciates the opportunity to comment on Proposal WP18-56, and we ask the Federal Subsistence Board to approve this proposal to allow sheep hunting by non-federally-qualified subsistence users in the Arctic Village Dall Sheep Management Area within the Arctic National Wildlife Refuge (ANWR).

Above all, the Wild Sheep Foundation's focus is on conservation. As the premier international sheep-focused conservation organization representing nearly 7,000 members, and an affiliated membership of another 5,000 worldwide, the Wild Sheep Foundation strives to enhance wild sheep populations, promote scientific wildlife management, educate the public and youth on sustainable use and the conservation benefits of hunting while promoting the interests of the hunter. Conservation and hunting go hand-in-hand because it is hunters who actually pay for wildlife management through agreements between states and the US Fish and Wildlife Service.

According to ANWR's official website, the Refuge is characterized as "amazing public land owned by all US citizens," and that people commonly come to the Refuge to "camp, hike, float rivers, hunt, or fish." These activities are all officially allowable uses on Refuge land. Hunting on refuges is a customary and traditional activity for Americans, and should be reopened in the area proposed in Proposal WP18-56. It is the right of all Americans to recreate, including hunting, on federal public land.

According to ANILCA's Appendix, Section 303, one of the purposes for the ANWR was the conservation of Dall sheep. The Wild Sheep Foundation, in harmony with this objective, is also supremely focused on wild sheep conservation, and indeed raises and directs more than \$4 Million annually to support professional scientific management and advancement of knowledge on biology, behavior, environmental resistance, health, and other needs of wild sheep and their habitats.

Hunting on the Refuge by non-federally-qualified subsistence users is supposed to be the rule and not the exception per ANILCA Title 815(4) which states that there can be no “authorizing a restriction on the taking of fish and wildlife for non-subsistence uses on the public lands ...unless necessary for the conservation of healthy populations of fish and wildlife.”

Conservation concern and meeting subsistence uses are the only criteria for closing hunting to non-federally-qualified subsistence users per ANILCA, and indeed, because there is no conservation concern in the area in question, and there is no substantial evidence showing need to keep the area closed to non-subsistence users to provide a meaningful preference for actual subsistence uses, ANILCA says there should be no restriction. Because ANILCA gives no other social or cultural reason for closure of hunting, continuing the closure remains a violation of ANILCA.

Reported harvests of Dall sheep over the last 25 years suggest inconsequential use of Dall sheep and inconsequential subsistence harvest. Also, exclusion of other hunters has had no biological benefit to populations – either sheep or human.

The current regulations for non-locals is from August 10 to September 20 (41 days) while the locals’ harvest season is October 1 to April 30 (182 days), a factor of almost 4.5 times as many days in the field. Because there is no overlap in seasons, there can be no conflict in the field between these two hunter groups. Additionally, while non-locals can only take one full curl ram, locals can harvest any three sheep, so not only are the locals’ seasons much longer, their bag limits provide much more opportunity than that of non-locals.

The Refuge and its resources belong to all Americans. Closures due to perceived cultural or social reasons are not supported by either ANILCA or the Refuge’s Comprehensive Conservation Plan. In fact, paraphrased, the latter document says:

- The Refuge has local, state, and national constituent users who must be considered in developing and implementing visitor use programs and policies. These visitor constituencies’ use is best addressed through a fair and open public planning process. (Objective 5.4)
- Uses will not be prohibited unless a public process determines the use is detrimental to the area’s resource values. (Objective 5.1) (Emphasis mine. Note that “cultural” or “social” uses are not legitimate criteria on which to order any closure to hunting.)
- Public access to Refuge lands for recreation is allowed to “provide the public with opportunities for wildlife-dependent recreation.” (Objective 5.4)

Because hunting is an allowed use on the Refuge, it appears Refuge intent is that hunting is clearly considered "wildlife-dependent recreation," and thus should not be precluded in the face of no conservation concern or jeopardy to the area's resource values, and ANILCA Article 815 supports this.

In conclusion, the Wild Sheep Foundation believes there is no legal reason, and there are no supporting data, to keep the Arctic Village Dall Sheep Management Area closed to non-subsistence hunting any longer. In truth, ANILCA and the Refuge both EXPECT uses to not be limited EXCEPT when a documented conservation concern clearly requires it. These conditions have not been shown to exist, and to be in harmony with the Refuge's purposes, Comprehensive Conservation Plan, and ANILCA, open hunting should be allowed by the passage of Proposal WP18-56.

Sincerely,

A handwritten signature in black ink, appearing to read "Gray N. Thornton", with a long horizontal flourish extending to the right.

Gray N. Thornton,
President & CEO

C: Karen Gordon, WSF Director, Fairbanks
Kevin Kehoe, AK WSF President, Anchorage