

WP16-10

Proposal for amendment to Federal Subsistence Hunting regulation

Name: Andy McLaughlin

Organization- Alaska Resident

Contact Information: Po Box 8043, Chenega Bay , AK 99574

1) What regulation are you wishing to change?

HUNTING UNIT 6 Cordova-Valdez

MOOSE

Customary and Traditional Use Determination

Currently reads :

Unit 6 D - no federal subsistence priority

Harvest limits

Unit 6 remainder

Open Season

No federal open season

2) How should the new regulation read?

Customary and Traditional Use Determination

Unit 6 D - Residents of Unit 6D

Harvest limits

Unit 6 remainder- 1 bull moose

Open Season

September 1 to Dec 31

3)Why should this regulation change be made?

The State of Alaska Hunting regulations reads

“Unit 6D” “One bull” “Harvest Ticket” “Sept 1- Sept 30”

This is a case where the state regulations are actually more lenient than the federal subsistence regulations. With a Rural subsistence priority the federal subsistence regulations should enable federally qualified subsistence users (rural residents of 6D) to get food more readily than the state when they allow Sport hunters to obtain recreation.

Traditionally the rural residents of unit 6D harvested moose in the winter months. Previous 804 analysis of the uses of the specific moose resource of Kings Bay revealed Chenega Bay and Tatitlek as specific historically documented users of the moose resource there. Historically any moose in the remainder of 6D were also utilized in similar fashion. In addition, enabling the season to extend to December 31st reflects closer to the customary timing known for when the resource was available and harvested (which was also traditionally even in January through early spring months).

This is a very straight forward, justified, and simple regulation change proposal that at minimum reflects the state regulations, but extends the season for federally qualified subsistence users to the timing that historically enabled rural residents to utilize the resource when it was most readily available.

WP16-11

Proposal for amendment to Federal Subsistence Hunting regulation

Name: Andy McLaughlin

Organization- Rural Alaska Resident

Contact Information: Po Box 8043, Chenega Bay , AK 99574

1) What regulation are you wishing to change?

Page 40 of Subsistence Harvest of Wildlife on federal Public Lands Regulations book

HUNTING UNIT 6 Cordova-Valdez

DEER

Customary and Traditional Use Determination

Unit 6 D - all rural residents

Harvest limits

Currently reads:

"4 deer- however, antlerless deer may be taken only from October 1- Dec 31"

This should remain as is.

Proposed Regulations would add an additional line that would read:

"1 buck January 1 - January 31st

Open Season

Currently reads:

"August 1 - December 31"

2) How should the new regulation read?

No Proposed change in Open season closing date under the harvest limits column- for the 4 allowed deer.

However, an additional row added should read.

Unit 6 D - all rural residents

"1 buck, (may be only taken from January 1 - January 31)"

And

Under the open seasons column:

"Jan. 1 - Jan. 31"

3) Why should this regulation change be made?

Unit 6D Federal Qualified subsistence hunters use their State sport recreation deer harvest tickets to obtain annual meat supply to feed their families. Due to unusual climate change weather patterns (mild winters), Federal Subsistence hunters harvested very few deer under state sport harvest tickets and none federal for the entire winter of 2014/15. The deer population is recovering from a decline 2 years ago as a result of a harsh winter. No emergency closures or limits were made this past winter. Recovery is taking place, as the population has had 2 consecutive winters to increase and deer populations historically rebound quickly after a series of mild winters. Many more deer than usual are being seen by residents, this may be a combined result of declining bear population and consecutive mild winters. The mild winter however does have a detrimental affect on subsistence hunter success

rates per hunter effort as there is little snow to confine the deer to smaller range of huntable area. This decreases harvest rates per hunter effort expended.

There were federally qualified subsistence user families in need of meat that went without any harvest of deer or goats this past winter. They have many mouths to feed and most of these families are unemployed.

This regulations change proposal is for an addition to existing regulations that is similar to what is already exists and is allowed in Unit 4, however this is not a request for allowance of additional harvest of any female does like unit 4 has established. This proposal is for a very limited take minimized to the harvest of one buck at the end of season and only during the month of January for each qualified subsistence user.

It is viewed that the harvest of one buck (per the limited amount of subsistence hunters) taken from the population poses no conservation concern, especially considering this harvest would most likely be taking place during winters that were so mild that deer in the month of December had expanded range, and were less confined to the beaches during December. One buck can service many does and commonly the harvest of some bucks from the population is not considered additive mortality. A decrease of winter weather induced stress upon the entire population as a whole result in expanded range opportunity for the deer when there is less snow. Expansion of range makes less deer available to hunters in the areas they typically concentrate in winters. At times of these mild winter conditions an additional month of allowed subsistence hunting would benefit the subsistence hunters by increasing opportunity for them to try to locate at least one buck each to harvest if they are still in need of meat at that time.

WP16-12

Milo Burcham
 Cordova Ranger District
 Chugach National Forest
 Cordova, Alaska
 (907) 424-4759
 mburcham@fs.fed.us

Current regulation

Unit 6 Deer		
All rural residents	4 deer however antlerless deer may be taken only from Oct. 1 – Dec. 31	Aug. 1 – Dec. 31

Proposed regulation

Unit 6 Deer		
All rural residents	5 deer however antlerless deer may be taken only from Oct. 1 – Dec. 31	Aug. 1 – Dec. 31

Reason for change

This change would reduce the potential for regulatory complexity and bring the Federal harvest limit for deer in Unit 6 to the same level as allowed in State regulation.

Currently, the State harvest limit for deer in Unit 6 is 5 deer. In most years, rural residents have harvested up to 5 deer under State regulations, and the lower Federal harvest limit has not resulted in any reduced opportunity. In recent years, since the deer population decline following the winter of 2011/12, the smaller Federal harvest limit has had the potential to create unnecessary regulatory complexity.

For instance, if the State season were to close by Emergency Order and the Federal in-season manager wanted to place a quota on the number of does taken, the Federal doe quota could only apply to the first 4 deer taken. The last (5th) deer taken would have to be a buck, regardless of whether the rural resident had taken any does up to that point. In this case, the increased Federal harvest limit would allow the Federal Special Action to apply to all 5 deer allowed, and not just the first 4, giving qualified rural residents more flexibility.

WP16-13

Proposal for amendment to Federal Subsistence Hunting regulation

Name: Andy McLaughlin

Organization- Rural Alaska Resident

Contact Information: Po Box 8043, Chenega Bay , AK 99574

1) What regulation are you wishing to change?

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HUNTING UNIT 6 Cordova-Valdez

BLACK BEAR

Customary and Traditional Use Determination

Unit 6 D – all rural residents, except no federal subsistence priority for residents of Whittier

Harvest limits

Currently reads:

"1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from June 11 to June 30."

Open Season

"September 1 to June 30" (is already what the current regulation reads in the open season column)

2) How should the new regulation read?

Proposed change in Opening of season dates for valid federal registration tags in the Harvest Limits column should reflect the actual start of season date and should read:

:

"1 bear. In Unit 6D a Federal registration permit is required to harvest black bear from September 10 to June 30."

3) Why should this regulation change be made?

Federal Subsistence hunters should have the entire federal black bear subsistence hunting season dates defined properly, and should not have to rely on State sport harvest ticket/tags for harvest of the 20 allowed black bears between September 10 to June 10, the federal registration permit is defined currently as ONLY good for June 10-30) however it should be useable throughout the earlier part of the season as well. With growing talk of the State of Alaska conducting a registration hunt in unit 6D for sport hunted black bears, the federal subsistence user needs to have their legal hunting season dates more properly defined to reflect the entire season Sept 10 through June 30..

This truly is an insubstantial regulations change proposal that is requesting the season dates reflect exactly what is already allowed, but simply to create proper season dates listed for the federal registration permit that should already have been established under the Harvest Limits column.

WP16-14

Proposal for amendment to Federal Subsistence Hunting regulation

Name: Andy McLaughlin

Organization- Rural Alaska Resident

Contact Information: Po Box 8043, Chenega Bay , AK 99574

1) What regulation are you wishing to change?

HUNTING UNIT 6 Cordova-Valdez

GOAT

Customary and Traditional Use Determination

Unit 6 D - all rural residents

Harvest limits

Unit 6D (subareas RG242, RG243, RG 244, RG245, RG249, RG266, and RG252 only)-
4 goats

Open Season

"August 20-Jan 31" (is what the current regulation reads)

2) How should the new regulation read?

Proposed change in Open season closing date- should read: "August 20- Feb 28"

3) Why should this regulation change be made?

Climate change has had an unusual affect on access to the goat range resulting in the inability for hunters to gain proximity to the resource. Highly unusual snowless/ mild winter conditions do not concentrate the goats in the range where they have been traditionally harvested. Later in the season, when snow accumulates, the goats move down from higher elevations where they are hunted. Multiple attempts by federally qualified subsistence hunters were made throughout the season, but no goats were readily available. Goats were seen, but conditions enabled the goats to be higher on the slopes in untouchable terrain, which prohibited the access that typically has been available to hunters during an average winter. Weather patterns also are increasingly unpredictable and in most recent years goats have proven to be available and in accessible terrain, but too dangerous to obtain from rough seas prohibiting safe access to shore. Lack of snow and rough seas both make goats unobtainable to subsistence hunters. Extension of the season may alleviate these issues.

The goat resource is typically relied more upon for subsistence use when deer resources are not obtainable. The previous harsh winter (2 years ago) caused a 70+ % decrease in deer population. Local rural residents of Chenega Bay rely heavily upon deer meat, with weather conditions limiting hunter success, all hunters had big plans to use goats as an alternate and much needed meat source. Several scheduled attempts to hunt goats were halted due to bad weather. On an average year, rough seas are the largest detrimental factor affecting filling of subsistence goat tags, this year when these conditions were absent it was lack of snow as well. Many times the seas are too rough for beach access and hunters are endangered, but when hunters could access the shore the goats were not there.

Extension of season dates would provide additional opportunity when previous hunt attempts were aborted due to bad weather, or if the winter was too mild and the goats were unavailable. This again proved to be a hardship for goat hunters in 2015.

During the last week of January (and the first 2 weeks of February 2015) snows came, and pushed the goats to where they are normally harvested and mild weather coincided, these conditions are ideal. Subsistence hunters held tags (hunt# FG0604), but the federal subsistence season had closed as of January 31. Resident qualified subsistence users held tags that were not able to be used, not from a lack of desire to hunt or lack of previous hunter effort, but due to premature season closure. With unpredictable weather patterns abounding in the past few years, extension of the harvest season to the end of February will increase possibility of harvest tags being able to be filled. In 2015, there were multiple families that needed the meat, they were unable to fill their State Sport Deer harvest tickets, and had hoped to turn to the federal subsistence goat tags as a plan B option for feeding their families. Several years ago, the same mild winter conditions occurred as well only to be followed by ideal conditions that arrived after the goat season had closed.

Then and more recently the winter snow increased in February which enables optimal conditions for goat hunting success rates more than likely to be higher, but with the goat season closed, no hunting was allowed and no meat was obtained.

Subsistence on the 6D goat resource occurs optimally when harvest rates increase in direct proportion to hunter effort expenditure. New weather patterns are preventing that from happening. Goat hunting is a time honored practice and a tradition. The methods outlined are in the manner customary to our unit 6D rural residents. The federal season has repeatedly proven to already be closed in February when the long awaited opportunity has finally presented itself. A longer lasting season would have alleviated this issue and provided meat for people.

The take is very limited, and 4 subsistence goat tags are issued to Chenega Bay Residents annually and in person by Milo Bercham of the Chugach National Forest. This extension of federal subsistence goat season dates would detrimentally affect no other user groups and would simply enable a viable option for those tags unable to be filled earlier in the season to become filled and recorded during times in the future if similar unfavorable seasonal conditions repeat themselves.

WP16-15

Wildlife Regulatory Proposal March 24, 2015

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

Jim Skogstad, President
Hope Village Council
P.O. Box 101 Hope, Alaska 99605
782-3521 Hm
229-1430 cell
782-3505 fax
akskogstad@aol.com email

On behalf of the community of Hope I am requesting a change in the current regulations regarding the caribou harvest limits in unit 7.

Existing Regulation Caribou

Unit 7-north of the Sterling Highway and west of the Seward Highway—-1 caribou by Federal registration permit (FC0702) only. The Seward Ranger District will close the Federal season when 5 caribou are harvested by Federal registration permit.

Proposed New Regulation

by Federal registration permit (FC0702) only. The Seward Ranger District will close the Federal season when 5 caribou are harvested by Hope subsistence users and 5 caribou are harvested from Cooper Landing subsistence users by Federal registration permit.

This regulation change should be made to assure that subsistence users in both communities have an opportunity to potentially harvest a caribou.

The potential impact on wildlife populations this change would have should be minimal. This is due to the inaccessibility of this game population.

The affect this will have on subsistence uses is significant. It will assure that users in each community have the ability to harvest a caribou.

This change will have minimal impact on other users due to the small number of local subsistence users qualified for this hunt.

Page 2

The reason I am requesting this change, is that last year when Cooper Landing was included in the hunt a group from that community harvested the limit on the first day of the season eliminating any chance of Hope subsistence users of harvesting a caribou.

The following signatures signify support for this proposal within the community of Hope.

Ray Tringler
Henry Math
Dan Dub
Douglas Hope
Jim Skystad 3/25/15

WP16-16

Paxson Closed Area

Dear Sirs;

The Paxson Fish and Game Advisory Committee has major concerns with the recent opening of the Paxson Closed Area.

The Paxson Closed Area, a relatively small strip of land between Paxson Mountain and the Richardson and Denali Highways, has been in existence for almost fifty years. It was established by the State of Alaska at the request of the Paxson Fish and Game Advisory Committee for two primary reasons.

1. To create a readily available viewing area for moose, caribou and the grizzlies which regularly access that small portion of the Gulkana in search of salmon. Non-consumptive wildlife users also have a very important role in our wildlife utilization and the PAC recognizes that.

2. To insure that the Nelchina caribou herd has a relatively unimpeded migration path off of Paxson Mountain, which is one of their primary routes during most years. The recent Oct. season opens can be very disruptive during fall migration and it has been documented that migration routes can be changed or disrupted due to stressful conditions. Two years ago was the perfect example with trucks and cars lining the road waiting for animals to cross. Fortunately, the Paxson Closed Area was then still in effect, (or at least we supposed it was), and 8-10,000 Nelchina caribou were able to pass with only a minor disruption. (The other side of the Richardson is open to hunting, but it is hilly and brushy with little immediate opportunity for hunters.)

We feel that opening a small part of the Closed area serves no practical purpose for subsistence hunters but does create a huge enforcement issue for both the State and for Federal enforcement personnel. The area is swampy with no clear defining landmarks. Opening 1500 acres in the middle of this area for Federal hunters only has created enforcement issues and some very hard feelings from those State hunters who regularly hunt in the area.

The Paxson Closed Area is also has State signage indicating it is a closed area. Confusion! The entity (BLM) charged with enforcement of the Closed are, put up no signage, or explanations of any kind indicating parts of the area might be open and to whom they would be open..... More confusion.

We of the Paxson Advisory Committee ask that the Federal Subsistence Council respect the wishes of the subsistence hunters you are charged with helping, and keep this small strip of land closed for both biological and esthetic reasons.

Please keep us informed as to the date of the meeting at which tis proposal will be discussed and we will send a representative.,

Thank you, John Schandelmeier, Chair; Paxson Fish and Game Advisory

WP16-17

2016-2018	Federal Subsistence Hunting and Trapping Proposals
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a. (the requestor) name, address and telephone number;

Southcentral Subsistence Regional Advisory Council
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503
909-786-3629

b. Quote the current regulation(s) with section and paragraph number, if known;

Caribou Unit 13

Unit 13 remainder-2 bulls by Federal
registration permit (FC1302) only.

Open Season

Aug. 1 – Sept 30
Oct. 21 – Mar 31

You may not hunt within the Trans-Alaska Oil Pipeline right-of-way is prohibited. The right-of-way is identified as the area occupied by the pipeline (buried or above ground) and cleared area 25 feet on either side of the pipeline.

c. A description of the regulatory change(s) desired;

Remove restrictions for Unit 13 remainder.

Caribou Unit 13

Unit 13 remainder-2 bulls by Federal
registration permit (FC1302) only.

Open Season

Aug. 1 – Sept 30
Oct. 21 – Mar 31

~~You may not hunt within the Trans-Alaska Oil Pipeline right-of-way is prohibited. The right-of-way is identified as the area occupied by the pipeline (buried or above ground) and cleared area 25 feet on either side of the pipeline.~~

d. A statement explaining why the change is necessary;

The current restriction for Unit 13 remainder is an undue burden to Federally qualified subsistence users and the current restriction/closure is not related any conservation concerns for the Nelchina Caribou Herd. Hunting violations may be issued under the current restrictions within the pipeline corridor. As a result, subsistence hunters can be cited whereas current State regulations do not restrict hunting within the corridor.

e. Proposed wording changes; and

Harvest Limit

Unit 13 remainder-2 bulls by Federal
registration permit (FC1302) only.

Open Season

Aug. 1 – Sept 30
Oct. 21 – Mar 31

~~Hunting within the Trans-Alaska Oil Pipeline right-of-way is prohibited. The right-of-way is identified as the area occupied by the pipeline (buried or above ground) and cleared area 25 feet on either side of the pipeline.~~

2016–2018 Wildlife Proposals

Southcentral

f. Any additional information that you (the requestor) believe will help the Federal Subsistence Board in evaluating the proposed change(s).

Removing the restrictions to Federally qualified subsistence hunters, hunting under the Federal subsistence regulations, within the Trans-Alaska Oil Pipeline right-of-way will remove differences between the State and Federal regulations. It is not anticipated that this change would impact the caribou population or other uses in the Trans-Alaska Oil Pipeline right-of-way.

WP16-18

Submitted to www.regulations.gov on 19Mar2015

Proposal for federal subsistence hunting and trapping regulations

Name

Organization: Wrangell-St. Elias National Park Subsistence Resource Commission

Contact information (Address, Phone, Fax or Email) PO Box 439, Copper Center, AK 99573.

Questions may be submitted c/o barbara_cellarius@nps.gov or 822-7236.

Your proposal must include the following information:

1. What regulations do you wish to change? Include management unit number and species. Quote the current regulation if known. If you are proposing a new regulation, please state new regulation.

Management Unit: Unit 11 and Unit 12

Species: Brown bear

Current regulation:

Unit 11: 1 bear, August 10 to June 15

Unit 12: 1 bear, August 10 to June 30

2. How should the new regulation read? Write the regulation the way you would like to see it written in the regulations.

Proposed regulation: Add a special provision that parallels the current provisions (season) for the harvest of black bears over bait:

Unit 11: You may use bait to hunt brown bear between April 15 and June 15.

Unit 12: You may use bait to hunt brown bear between April 15 and June 30.

3. Why should this regulation change be made?

This regulation change will provide additional opportunity for local rural residents to harvest brown bears for food in the spring, especially in heavily forested areas where there are not places that bears concentrate.

WP16-19

Regulatory Year	Subject	Ending Date
2016-2018	Federal Subsistence Hunting and Trapping Proposals	March 25, 2015

a. Your (the requestor) name, address and telephone number

Ahtna Heritage Foundation
P.O. Box 213
Glennallen, Alaska 99573
(907) 822-5778

b. Quote the current regulation(s) with section and paragraph number, if known

Ahtna Heritage Foundation Culture Camp

Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from August 1-September 20 for 1 moose or August 1- September 30 for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation's culture camp. Hunting efforts are to cease when the camp event ends. No combination of caribou and moose is allowed. The animals may be taken by any Federally qualified hunter designated by the Camp Director. The hunter must have in their possession the permit and a designated hunter permit while hunting.

c. A description of the regulatory change(s) desired

Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from July 15 – August 31 for 1 bull moose or July 15 – August 31 for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation's culture camp.

d. A statement explaining why the change is necessary

This culture camp usually occur during the months of July and August. At what time Ahtna Heritage Foundation culture camp is held depends on weather conditions and circumstances beyond the Camp Director's control. July month and early part of August month is the ideal time to hold a culture camp. July month is usually the warmest month, which is good for the health of the Elders. Fish wheels are still in operation and salmon can be shared at the Ahtna Heritage Foundation Culture Camp. August month is the ideal time to hunt for wild game, pick berries and other plants.

An earlier season is needed to hold Ahtna Heritage Foundation's culture camp. Ahtna Heritage Foundation Culture camp instructs younger generation how to cut, dry, care for and preserve salmon. Soup made from Sockeye and Chinook is also prepared for meals at the culture camp. Moose or caribou is also prepared for dinner. Meals are made from meat, organs, head, front and back legs. The hide is preserved for handicrafts. Blue berries, cranberries and other wild plants and berries are also picked, eaten or preserved and given to elders at the camp.

e. Proposed wording changes

Ahtna Heritage Foundation Culture Camp:

Upon written request from the Ahtna Heritage Foundation to the Glennallen BLM Field Office, either 1 bull moose or 2 caribou, sex to be determined by the Glennallen Field Office Manager, may be taken from July 15 – August 31 for 1 bull moose or July 15 – August 31 for 2 caribou by Federal registration permit for the Ahtna Heritage Foundation's culture camp. Hunting efforts are to cease when the camp event ends. No combination of caribou and moose is allowed. The animals may be taken by any Federally qualified hunter designated by the Camp Director. The hunter must have in their possession the permit and a designated hunter permit while hunting.

f. Any additional information that you (the requestor) believe will help the Federal Subsistence Board in evaluating the proposed change(s)

Ahtna Heritage Foundation Culture Camp is needed to teach the younger generation Ahtna's way of life. Preservation and teaching Ahtna's culture to the younger generation and others is imperative to keep our way of life. Each summer this culture camp is held to teach and instruct young adults and others on Ahtna's preservation of language, history, stories and legends. Instruction is also given on preserving, cooking, handling, caring for and teaching usage of wild game, fresh water fish and plants.

The Elders enjoy teaching the younger generation and it is good for them to get out of the house and visit with each other. It is also good for their health and well-being. Younger generation will learn about the Ahtna's way of life and pass on this knowledge to their children and others. Ahtna Culture will continue to stay alive.

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

WP16-20

Wildlife Proposal to the Federal Subsistence Board

Name: Eastern Interior Alaska Federal Subsistence Regional Advisory Council

Date: March 5, 2015

Organization: Office of Subsistence Management

Address: 1011 E. Tudor Rd. Anchorage, AK 99503

Contact: Eva Patton, Council Coordinator

Phone: 907-786-3358

Name: Eastern Interior Alaska Federal Subsistence Regional Advisory Council

1: What Regulation do you wish to change? Hunting regulations for Sheep in Unit 11

Existing Hunting Regulation: Unit 11 – Sheep

<i>Sheep:</i>	
<i>1 sheep</i>	<i>Aug. 10-Sept. 20.</i>
<i>1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken.</i>	<i>Aug. 1-Oct. 20.</i>

Proposed Hunting Regulation: Unit 11 – Sheep

<i>Sheep:</i>	
<i>1 sheep ram with ¾ curl horn or larger</i>	<i>Aug. 10-Sept. 20.</i>
<i>1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken.</i>	<i>Aug. 1-Oct. 20.</i>

Why the regulation should be changed? There is concern about the health of Dall sheep populations statewide. A conservative approach to sheep management is needed. Given the current low density of sheep and the harvest pressure on a Unit 11 sheep population that is relatively easy to access from the road system, a harvest limit of “any sheep” is not appropriate. A harvest limit of 1 ram with ¾ curl horn or larger will give federal subsistence users a meaningful priority over people hunting under the state of

Alaska’s general hunting regulations while at the same time protecting ewes and younger rams from harvest.

No change is proposed for the harvest limit for the elder hunt. Participation in that harvest opportunity is very limited and there are already provisions that protect lambs and ewes with lambs from harvest.

The Council referred to subsistence hunters they know in the area and Unit 11 that hunt sheep usually take rams for conservation reasons and therefore the proposal would not pose undue hardship on subsistence users but would further support allowing the sheep population to rebound from the recent declines.