



**Gates of the Arctic National Park
Subsistence Resource Commission
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October 6, 2026

Chair Jack Reakoff
c/o Nissa Pilcher, Coordinator
Western Interior Regional Advisory Council
Office of Subsistence Management
101 12th Avenue Room 216
Fairbanks, Alaska 99701

Re.: Gates of the Arctic National Park Subsistence Resource Commission Dall's Sheep Management Hunting Plan Recommendation

Dear Chairman Reakoff and Council Members,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met on April 15-16, 2026, in-person in Fairbanks and via Teams and discussed the Dall's Sheep Management Hunting Plan Recommendation. The SRC finalized the document and it is now ready to go through the Hunting Plan Recommendation process, namely to be shared with both the affiliated Federal Subsistence Regional Advisory Councils (RACs) and the affiliated State Local Advisory Committees (ACs).

The SRC is requesting that this document be shared with the North Slope Regional Advisory Council at your next scheduled meeting and written comments be submitted within 60 days of receipt of this letter. Written comments should be sent to the SRC Chairperson, Taqulik Hepa via Marcy Okada, NPS Subsistence Coordinator at marcy_okada@nps.gov as well as cc'ing Mark Dowdle, Superintendent of Gates of the Arctic National Park and Preserve at mark_dowdle@nps.gov.

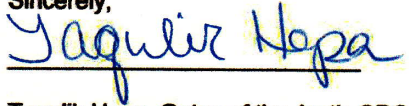
The SRC will review all of the comments at their next meeting which is scheduled for November 2026 and will modify and edit the Hunting Plan Recommendation. Ultimately, the SRC approved Recommendation will be sent to both the Secretary of Interior and the Governor of Alaska. The Governor will have an opportunity to review the Hunting Plan Recommendation and provide proposed changes. The Secretary will then consider any comments from the Governor and render a decision after a 60-day period.

Under the Alaska National Interest Lands Conservation Act (ANILCA) Section 808(b), the Secretary shall promptly implement the Recommendation unless he finds, in writing, that it violates recognized principles of wildlife conservation, threatens the conservation of healthy populations of wildlife in the park or monument, is contrary to the purposes for which the park or

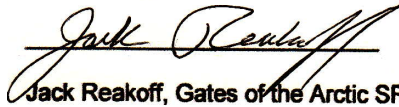
monument is established, or would be detrimental to the satisfaction of subsistence needs of local residents.

Thank you for your time and consideration.

Sincerely,



Taqulik Hepa, Gates of the Arctic SRC Chair



Jack Reakoff, Gates of the Arctic SRC Vice-Chair

Gates of the Arctic National Park and Preserve Subsistence Resource Commission's Dall's Sheep Management Hunting Plan Recommendation April 2026

The Western Interior Regional Advisory Council (WIRAC) has continued to share grave concerns regarding the current state of Dall's sheep populations within the Central Brooks and Alaska Ranges. The Council's authority to ensure healthy populations of fish and wildlife using recognized scientific principles is found in ANILCA Title VIII, sec. 805 (3) (A) through D. Sec 805 (3) (A) is explicit regarding evaluation and recommendation concerning policies and management plans. (3) (D) (i) through (iv) requires councils to identify and make recommendations regarding management of fish and wildlife to ensure subsistence uses.

Many Dall's sheep populations have been reduced to numbers far below their long-term average size. These declines are potentially due to multiple factors, with climatic events in the past decade being of particular concern. Local rural residents have utilized and relied on these sheep for consumptive use. The Customary and Traditional use determinations reflect these uses. Many local rural residents have recognized these critical declines in sheep populations and voluntarily reduced harvest.

The State of Alaska Board of Game endeavored to develop a sheep management plan in 2014/15. The broad base in user group participants could not come to a consensus on several issues. Without a plan to set basic parameters for Dall's sheep management, some populations may be at risk for further reductions of population size.

The WIRAC has successfully advocated for Federal Subsistence Board regulatory closure for all hunting of suppressed sheep populations in game management units (GMUs) 24A and 26B west of the Sagavanirktok River through 7/1/2026.

The WIRAC recommended management strategies regarding the biological parameters needed to maximize the opportunity for growth of Dall's sheep populations and the subsistence and non-subsistence uses on Federal public lands (April 2025 WIRAC draft Dall's sheep management strategy guidelines).

The Gates of the Arctic National Park and Preserve Subsistence Resource Commission (Commission) has statutory authority, Alaska National Interest Lands Conservation Act (ANILCA) Title VIII, §808(a) and (b), regarding hunting plan recommendations for park resource management (Appendix A). The Commission reviewed the WIRAC's Dall's Sheep Management Strategy at their April 2025 meeting. It was incumbent for the Commission to address this issue and the Commission is compelled to submit a hunting plan recommendation (which is outlined below). When the Commission has found the Management Strategy to be acceptable for submission to the Secretary of Interior as a hunting plan recommendation, it will be assigned a hunting plan recommendation number (Appendix B).

Sheep Ecology According to the Observations of the Commission

It is recognized that Dall's sheep are very social animals with moderate to high degrees of site fidelity. Dall's sheep rams and ewes learn their surrounding landscape to acquire resources throughout the year – for feeding, rutting, and mineral uses. As young sheep move with older animals, they learn predator evasion strategies. Younger sheep will run to the mature sheep to lead them out of harm's way. Sheep can routinely live 10 to 12 years of age under normal conditions. Many lightly hunted areas routinely sustain 10 to 12-year old ram harvests.

Wind scouring of habitat is very important to all sheep. Early wet snow with rain on snow seals ridges, preventing wind scouring. Dall's sheep are not very tall (12-20" to the belly, depending on sex/age) and have a climbing hoof not conducive to excavating a lot of snow.

Rain on snow, deep snow, and late springs exhaust weaker individuals and can cause population declines. Sheep that typically die off first are young of the year, smaller yearlings that were late-born, and older animals over 10 to 12 years old. Most rams 2 to 10 years old survive hard winters. Ewes are approximately 50% smaller and have higher mortalities in deep snow than rams.

When winter-stressed ewes survive deep wet snow and/or late springs, their physiological recovery can take all summer, and fecundity is affected for the next reproductive cycle. Lambs produced by stressed ewes will typically be late born, smaller than average, with reduced winter survival rates, especially if another bad winter is encountered. Young ewe sheep that survive to adulthood after a hard winter start in life may not produce lambs until their fourth year of life.

Sheep rely on snow melt on steep south-facing slopes to access new growth in late April. They will move to very low elevations to get green florescence as soon as it is available. With each additional week that the melt off is delayed, overall sheep mortality increases, especially gestating ewes and yearlings. A one-month delayed melt-off in 2013 proved to be extremely detrimental to vulnerable segments of the sheep population. Most yearlings, older sheep, and lambs died, causing greater than 50% declines in some sheep populations. The severely stressed ewe component in Gates again produced extremely low lamb numbers in 2014. The end-result caused three recruitment cohorts (2012, 2013, and 2014) to be below average in numbers.

Sheep move up the south-facing, melted slopes with the green up. In mid to late May through the 14th of June most sheep are on south-facing alpine slopes that have dryas and other wildflower forbs in pre-blossom and in flower. This is the critical period when there is high protein pollen available to put into muscle recovery and lactation. Periodic rain events delay pollinating insect activity, providing longer access for sheep to this high-quality feed. Sheep move onto ridges and north-facing slopes as the wildflower forbs come into later phenology blossom. Damp, cloudy summers are a big advantage to sheep because this extends their access to high protein. Recruiting lambs will have much heavier fall weights.

Conversely, rapid melt off with hot weather maximizes the insects to pollinate the forbs. When they pollinate quickly, the high-protein food source is available for a shorter period of time. Lactating ewes will have less exposure to high quality feed, affecting fall lamb weights, yearling growth rates, and the ewe's own fat reserves. Very young rams leave their natal ewe group in the summer of their second or third year, having 1/4-1/2 curl horns. Established 1/2 and 3/4 curl

rams typically ostracize these young rams, as they endeavor to join ram groups. Most rams separate from ewes in summer and fall, working out their pecking orders for dominance. These young rams are inexperienced in predator detection and are at a vulnerable position before they are accepted into a ram group. Young rams tend to run to the oldest rams when predators are detected. Mature sheep lead the way to escape terrains they know intricately in their home range.

Mature rams aged 7 to 12 years old have fat reserves to endure the rutting activity and combat with other rams. Heavy fat reserves translate to kinetic energy when butting horns. Adult rams' orbital gland weeps a strong pheromone that is attractive to ewes. Adult rams will provide more synchronous first estrus with best advantage to the lamb's survival. These adult rams have a much higher winter survival rate than if only young rams are available. Young rams 3 to 6 years old have less pheromone with a disruptive effect on breeding ewes. Younger rams left as primary breeders reduce successful recruitments to the population. In the absence of older rams, younger rams will expend a tremendous amount of energy chasing ewes that are essentially rejecting them. Often, ewes will pass their first estrus without breeding when only younger rams are available. If they do breed with these younger rams, it may be during their second estrus, potentially resulting in late-born lambs not hearty enough for the coming winter. Young rams with much lower fat reserves and body mass may expend too much energy as primary breeders and may die prematurely in normal winter stress.

The social presence of 7- to 12-year-old rams may be very important to the overall sheep populations' survival. Mature rams can defend ewes from young rams while in rut, saving young rams' fat reserves. Mature rams are larger and have more experience evading predators, helping younger rams' survival throughout the annual cycle. Mature rams' larger body mass may allow them to access varied feeding areas in winter by breaking trails for smaller sheep on the mountain. Mature rams and ewes can lead younger cohorts throughout their home ranges - to mineral sources, spring feeding sites, rutting areas, and for predator avoidance.

Dall's Sheep Management Recommendations

Remote weather monitoring by staff

Winter weather events should continue to be monitored by federal management agencies that have sheep habitat. Many times, there are remote sensing instruments and weather reporting stations to draw data from. There are also webcams that can be remotely accessed. Regional Advisory Councils' and State Advisory Committees' comments on local conditions such as deep snow, rain on snow, late spring, far fewer animals observed, etc. need to be taken into consideration for sheep conservation and management. There should be open dialogue and sharing of findings between managers and local users.

Adverse conditions to sheep over-winter success:

- Early winter deep snow with rain events.
- Extended warm up with liquid rain that freezes on snow creating a crust throughout the winter.
- Late spring melt off timing.

Positive conditions for sheep successful wintering:

- Freeze up before significant snowfall.
- Cold snowfall at typical snow depths throughout the winter.
- High winds to scour the mountain ridges.
- Melt-off commencing in late April on south facing slopes.

Survey timing and methodology

- Managers should strive to manage Dall's sheep within the game management units and subunits they reside in. These subpopulations should not be expected to provide large sport hunting harvests for the entire mountain range encompassing multiple GMUs. GMU and subunits with snow shadows that hold higher sheep populations should not be combined with areas with typically higher snowfalls. Spatially explicit distance sampling models may enable this.
- Sheep aerial surveys should be conducted in July to sample the entire population (i.e., not just in the most visible areas). Dall's sheep are white in color and therefore are much more difficult to detect when snow cover is present especially in broken or mottled snow cover as typical in the Brooks Range in June. The timing of surveys in July is to ensure minimal snow is present in sheep habitat. There is no evidence suggesting that sheep dispersal onto north facing slopes affects sightability of sheep from aircraft. Thus far, the National Park Service has never had wildfire smoke prevent a survey entirely. July survey dates have been widely used for decades in Alaska, despite the somewhat more ideal flying weather conditions typically found in June. Repeatability of, and comparability to, previous surveys are pivotal for comparative purposes and estimation of population trends.
- The currently depressed sheep population should be surveyed with distance sampling methods. Managing wildlife using the best available science is a key tenant of ANILCA and the North American Model of Wildlife Management. The current understanding of population estimation suggests that incorporating statistical uncertainty when estimating population size of wildlife is critical for upholding scientific integrity and statistical rigor (that is, it is the best available science). Distance sampling accounts for uncertainty at many stages of estimating wildlife abundance and is one of the most statistically rigorous and widely used methods for estimating population sizes of wildlife across the globe. In addition to scientific rigor, cost effectiveness is just as important due to the limited budgets agencies possess. Distance sampling samples the landscape; it does not survey the entire survey area. Instead, distance sampling counts animals along randomly located transects. Because of the random transect design, managers can use the information in surveyed areas to estimate how many animals exist in areas that were not surveyed. However, minimum counts rely on surveying and counting all physically present animals across survey areas. This necessitates much smaller survey areas and severely restricts the geographical scope of population estimates from minimum counts. Distance sampling reduces survey costs by approximately 80% as compared with minimum counts. Other types of survey data or estimation methods that integrate or supplement distance sampling can be tested and used if financially, statistically, and logistically feasible.

- Ram groups need to have composition documentation to calculate age classes present in the overall sheep population, and success or loss of certain cohorts. This is best achieved with high-definition digital cameras with optical zoom. Classification of rams by curl should be tested in the following three curl classes: (1) $\frac{1}{2}$ curl, (2) $\frac{3}{4}$ curl, and (3) $\geq$ full curl. Tests of this classification class should reveal if data collection on this fine a scale is feasible for data collectors and statistical precision from distance sampling.
- Where logistically and financially feasible, the Commission recommends supplementing distance sampling with focused, detailed, on-the-ground composition counts.
- Limited availability of full curl rams could increase reliance upon utilizing counting horn annuli for aging which can be difficult in the field, especially for inexperienced hunters and potentially lead to accidental take of sub-legal rams.

Allocation of Dall's sheep on Federal lands

- The highest priority is to maintain healthy populations of the Dall's sheep resource, using best science. If the recourse needs harvest reduction, this needs to happen once population data are available. When survey data are unavailable or incomplete for a struggling sheep population, management should default to restrictive management.
- Healthy populations of Dall's sheep will support subsistence harvests annually. This is a priority use. Some subsistence ewe harvest when sheep populations are at higher levels can be sustainable, especially in remote or limited eligibility areas like Park units.
- Road accessible areas like the Dalton Highway area in GMUs 24A and 26B have high impact use by non-federally qualified resident and commercial hunters, typically 10-20 miles from the road. Sheep move perpendicular to the road in mountainous habitats. Sheep ram populations within the 20-mile zone move in and out of the Dalton Highway Corridor Management Area. The ram populations are subjected to multiple encounter rates by walk-in, aircraft, and boat hunters.
- Commercial allocations within the high road impact zone, 20 miles in, should be calculated for an appropriate number of available legal rams. This would maintain subsistence allocation and high resident non-federally qualified hunter participation.
- Federal managers are charged with maintaining healthy populations of wildlife using recognized scientific principles on Federal public lands. When sheep populations show declines or missing cohorts, it is incumbent on managers to inform the SRCs and Regional Advisory Councils to anticipate needed actions. Ideally both Federal and State Boards will support conservation until the sheep populations are well on their way to achieving long-term average population sizes.

Appendix A

ANILCA Title VIII, Section 808

(a) Within one year from the date of enactment of this Act, the Secretary and the Governor shall each appoint three members to a subsistence resources commission for each national park or park monument within which subsistence uses are permitted by this Act. The regional advisory council established pursuant to §805 which has jurisdiction within the area in which the park or park monument is located shall appoint three members to the commission each of whom is a member of either the regional advisory council or a local advisory committee within the region and also engages in subsistence uses within the park or park monument. Within eighteen months from the date of enactment of this Act, each commission shall devise and recommend to the Secretary and the Governor a program for subsistence hunting within the park or park monument. Such program shall be prepared using technical information and other pertinent data assembled or produced by necessary field studies or investigations conducted jointly or separately by the technical and administrative personnel of the State and the Department of Interior, information submitted by, and after consultation with the appropriate local advisory committees and regional advisory councils, and any testimony received in a public hearing or hearings held by the commission prior to preparation of the plan at a convenient location or locations in the vicinity of the park or park monument. Each year thereafter, the commission, after consultation with the appropriate local committees and regional councils, considering all relevant data and holding one or more additional hearings in the vicinity of the park or park monument, shall make recommendations to the Secretary and the Governor for any changes in the program or its implementation which the commission deems necessary.

(b) The Secretary shall promptly implement the program and recommendations submitted to him by each commission unless he finds in writing that such program or recommendations violates recognized principles of wildlife conservation, threatens the conservation of healthy populations of wildlife in the park or park monument, is contrary to the purposes for which the park or park monument is established, or would be detrimental to the satisfaction of subsistence needs of local residents. Upon notification by the Governor, the Secretary shall take no action on a submission of a commission for sixty days during which period he shall consider any proposed changes in the program or recommendations submitted by the commission which the Governor provides him.

Appendix B

ANILCA SECTION 808 GUIDELINES FOR SUBMITTING HUNTING
PLAN RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR
AND
THE GOVERNOR OF ALASKA

I.	SRC develops "Draft Hunting Plan Recommendation" during regular meeting.
II.	SRC passes motion approving "Draft Hunting Plan Recommendation" during regular meeting.
III.	SRC sends "Draft Hunting Plan Recommendations" to appropriate local advisory committees and federal regional councils. Consultation is required pursuant to Section 808. A. Attach SRC Chairperson's cover letter requesting comments within a stated time of not less than 60 days from the date of mailing. Document letters sent to local advisory committees and federal regional councils. Use SRC stationery for all SRC correspondence. Do not use NPS Stationery. B. All responses to the "Draft Hunting Plan" become part of the SRC administrative record. Written comments should be sent to the SRC Chairperson and copied to the Superintendent. NPS SRC manager provides SRC members with copies of comments prior to next SRC meeting.
IV.	During a regular meeting, the SRC analyzes all comments received as a result of the consultation process. SRC should consider testimony received on the "Draft Hunting Plan" from the public during any hearings or meetings.
V.	SRC should modify, edit, re-write or eliminate or adopt the "Draft Hunting Plan Recommendation".

VI.	The "Draft Hunting Plan Recommendation" becomes a final "Hunting Plan Recommendation" when the SRC passes a motion approving the final language within the recommendation.
VII.	SRC Chairperson sends the SRC approved "Hunting Plan Recommendation" to both the Secretary of the Interior and the Governor of Alaska. Attach a Chairperson's cover letter of introduction to the plan.
VIII.	Secretary will take no action on a submission of a commission for sixty days during which period he shall consider any proposed changes in the recommendations submitted by the commission which the Governor provides him.
IX.	Secretary shall promptly implement the recommendations submitted to him by each commission unless he finds in writing that such program or recommendations violates recognized principles of wildlife conservation, threatens the conservation of healthy populations of wildlife in the park or monument; is contrary to the purposes for which the park or monument is established; or would be detrimental to the satisfaction of subsistence needs of local residents.