

WP26–76 Executive Summary	
General Description	Wildlife Proposal WP26-76 requests to extend the Federal lands closure to sheep hunting by all users in portions of Unit 25C and 20E through the 2026-2028 wildlife regulatory cycle. <i>Submitted by: Eastern Interior Alaska Subsistence Regional Advisory Council</i>
Proposed Regulation	<p>Unit 20E– Sheep</p> <p><i>Unit 20E—1 ram with full-curl horn or larger</i> <i>Aug. 10–Sep. 20.</i></p> <p><i>Federal public lands within Yukon-Charley Rivers National Preserve and in the North Peak Mountain area within the Glacier Mountain Controlled Use Area, are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.</i></p> <p>Unit 25–Sheep</p> <hr/> <p><i>Units 25B, 25C remainder, and 25D—1 ram with full-curl horn or larger</i> <i>Aug. 10–Sep. 20.</i></p> <p><i>Unit 25C, within Yukon-Charley Rivers National Preserve</i> <i>No open season</i></p> <p><i>Federal public lands are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.</i></p>
OSM Conclusion	Support Proposal WP26-76 with modification to close all Federal public lands within the Glacier Mountain CUA to sheep hunting by all users for the 2026 and 2027 regulatory years.
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	Support as modified by OSM with an additional Council modification to remove the sunset clause.
Interagency Staff Committee Comments	The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

WP26-76 Executive Summary	
ADF&G Comments	Oppose
Written Public Comments	None

Wildlife Analysis WP26-76

ISSUE

Wildlife Proposal WP26-76, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council (Council), requests to extend the Federal lands closure to sheep hunting by all users in portions of Unit 25C and 20E through the 2026-2028 wildlife regulatory cycle.

Specifically, this proposal requests the closure enacted by Wildlife Special Action WSA24-01 for the 2024 and 2025 seasons in Yukon-Charley Rivers National Preserve (YUCH, Units 25C and 20E) and on Bureau of Land Management (BLM) lands in the North Peak Mountain area within the Glacier Mountain Controlled Use Area (CUA, Unit 20E) be extended through the 2026 and 2027 hunting seasons (**Figure 1**).

Proponent Statement

The proponent states that the Federal Subsistence Board (Board) approved Wildlife Special Action request WSA24-01 to close sheep hunting in these areas for the 2024 and 2025 regulatory years due to significant declines in the sheep population and extreme conservation concerns. The intent of the original closure was to give time for sheep populations to rebuild. Not enough time has passed for this to occur, and therefore, the proponent wants to extend the closure for another two years. It is the hope of the proponent that during this closure extension, the population will show signs of recovery. The proponent adds that surveys will be necessary to monitor the population status before the next regulatory cycle.

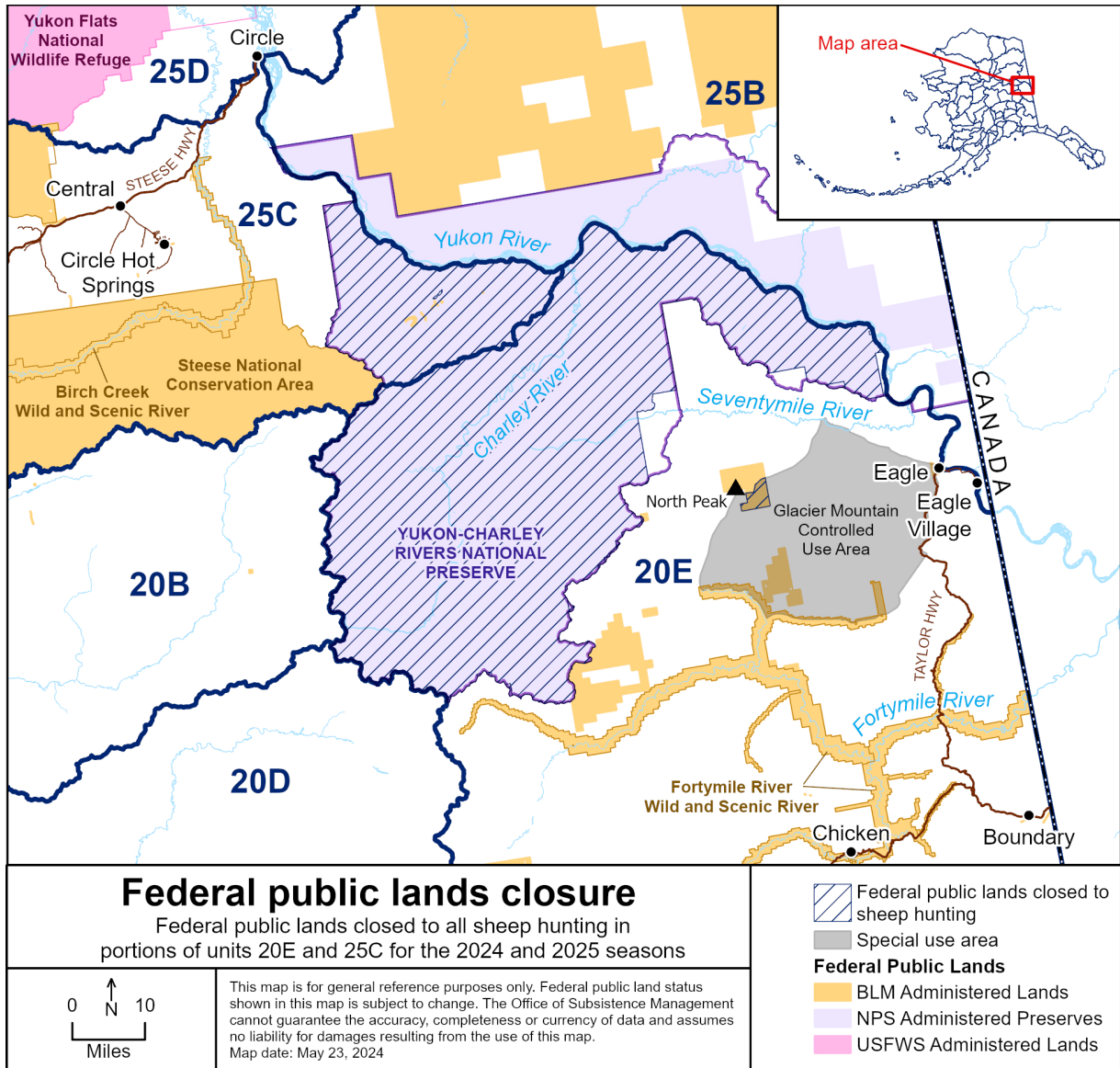


Figure 1. The 2024 and 2025 closure area to sheep hunting (hatched area). YUCH includes portions of Units 20E, 25B, and 25C.

Current Federal Regulations

Note: These are the codified Federal regulations.

Unit 20E– Sheep

Unit 20E—1 ram with full-curl horn or larger

Aug. 10–Sep. 20.

Unit 25—Sheep

Units 25B, 25C, and 25D—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Note: These are the regulations for the 2024/25 and 2025/26 regulatory years, enacted by Wildlife Special Action WSA24-01. These closures are not in codified Federal regulation.

Unit 20– Sheep

Unit 20E—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Federal public lands within Yukon-Charley Rivers National Preserve and in the North Peak Mountain area within the Glacier Mountain Controlled Use Area, are closed to sheep hunting by all users for the 2024 and 2025 regulatory years.

Unit 25—Sheep

Units 25B, 25C remainder, and 25D—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Unit 25C, within Yukon-Charley Rivers National Preserve *No open season*

Federal public lands are closed to sheep hunting by all users for the 2024 and 2025 regulatory years.

Proposed Federal Regulations**Unit 20E– Sheep**

Unit 20E—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Federal public lands within Yukon-Charley Rivers National Preserve and in the North Peak Mountain area within the Glacier Mountain Controlled Use Area, are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.

Unit 25—Sheep

Units 25B, 25C remainder, and 25D—1 ram with full-curl horn or larger Aug. 10–Sep. 20.

Unit 25C, within Yukon-Charley Rivers National Preserve No open season

Federal public lands are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.

Current State Regulations

Unit 20— Sheep

Unit 20 remainder Residents— One ram with full-curl horn or larger. Youth hunt only. HT Aug. 1-Aug. 5.

Nonresidents— One ram with full-curl horn or larger every four regulatory years by permit. Youth hunt only.

Unit 20 remainder Residents— One ram with full-curl horn or larger. HT Aug. 1-Sept. 20.

Nonresidents— One ram with full-curl horn or larger every four regulatory years by permit

Unit 25—Sheep

Units 25B, 25C, 25D Residents— One ram with full-curl horn or larger. Youth hunt only. HT Aug. 1-Aug. 5.

Nonresidents— One ram with full-curl horn or larger every four regulatory years. Youth hunt only.

Units 25B, 25C, 25D Residents— One ram with full-curl horn or larger. HT Aug. 10-Sept. 20.

Nonresidents— One ram with full-curl horn or larger every four regulatory years.

Extent of Federal Public Lands

Unit 20E is comprised of approximately 28% Federal public lands that consist of 21% National Park Service (NPS) managed lands and 7% Bureau of Land Management (BLM) managed lands.

Unit 25C is comprised of approximately 76% Federal public lands that consist of 67% BLM managed lands, 9% NPS managed lands, and 1% U.S. Fish and Wildlife Service (USFWS) managed lands.

Customary and Traditional Use Determination

Residents of Units 20E, 25B, 25C, 25D, and the communities of Dot Lake, Healy Lake, Northway, Tanacross, Tetlin, and Tok have a customary and traditional use determination for sheep in Unit 20E.

Residents of Units 20E, 25B, 25C, and 25D have a customary and traditional use determination for sheep in Unit 25C.

Regulatory History

Prior to 2014, there was no Federal hunting season for sheep in Units 20E or 25C.

In 2014, the Federal Subsistence Board (Board) adopted Wildlife Proposals WP14-42 and WP14-43. Proposal WP14-42 recognized the current customary and traditional use determination for sheep in Units 20E, 25B, and 25C. Proposal WP14-43 established the current, codified Federal hunting season and harvest limit for sheep in Units 20E, 25B, and 25C.

In August 2023, the Board approved Wildlife Special Action WSA23-05 to close sheep hunting to all users within Yukon-Charley Rivers National Preserve (YUCH) in Units 20E and 25C for the fall 2023 season to assure the continued viability of sheep. The Board stated that sheep abundance within YUCH was in serious decline based on the most recent minimum count survey data from NPS with only two legal rams observed. The Board also noted the closure only affected NPS managed lands in Units 20E and 25C. Federal subsistence users had opportunities to harvest sheep on NPS lands in Unit 25B and under State regulations. The closure was consistent with ANILCA Section 816(b) for conservation of sheep within YUCH and the continuation of subsistence uses of the sheep in the long-term.

During their April 16, 2024 meeting, the Eagle Fish & Game Advisory Committee (AC) unanimously voted to request emergency closure of the Glacier Mountain area sheep hunt in Unit 20E under State regulations. The Eagle AC wrote a letter to the Alaska Department of Fish and Game (ADF&G) Commissioner requesting a delegation of authority to initiate this closure, stating it planned to contact other ACs with jurisdiction in Unit 20 and to schedule another meeting to discuss their request (Eagle AC 2024).

In May 2024, the Board approved Wildlife Special Action WSA24-01 to extend the closure of sheep hunting to all users within the YUCH in Units 20E and 25C for the fall 2024 season with modification to also close Federal public lands to sheep hunting by all users in the North Peak Mountain area within the Glacier Mountain CUA in Unit 20E, and to extend these closures through the 2025 regulatory year. The Board recognized extreme population concerns for the YUCH and Glacier Mountain CUA sheep populations. The Board extended the closure to provide additional time for population recovery and focused the closure on the Federal lands within the Glacier Mountain CUA that would have the most impact on sheep harvest and recovery of the sheep population. The Board elaborated that the North Peak Mountain area contains high elevation, quality sheep habitat and provides a travel corridor for sheep between YUCH and the Glacier Mountain CUA.

On June 28, 2024, ADF&G issued Emergency Order (EO) #R3-6-24, closing all 2024 sheep seasons in the Glacier Mountain CUA. ADF&G stated that during the two most recent surveys of the Glacier Mountain CUA, few sheep and no legal rams were observed. ADF&G explained that although the full curl harvest strategy is an extremely conservative approach to hunt management, there are times when more conservative strategies are warranted to address public concerns. The emergency closure was intended to address public concerns for sheep in the area (ADF&G 2024).

The Glacier Mountain CUA is closed to any motorized vehicle for hunting, including transportation of hunters, their hunting gear, and/or parts of game, from Jul. 26-Sept. 20 under State regulations and from Aug. 5-Sept. 20 under Federal regulations.

Current Events

On April 16, 2025, ADF&G issued EO #R3-4-25, extending the closure of all sheep seasons in the Glacier Mountain CUA for the 2025 season, effective August 10, 2025, with the same justification as the 2024 EO.

Biological Background

Yukon-Charley Rivers National Preserve

The YUCH includes portions of Units 20E, 25B, and 25C (**Figure 1**). Dall sheep (*Ovis dalli*)¹ inhabit the mountains and river bluffs of YUCH at low density. The sheep population within YUCH is naturally small and isolated from larger population sources, which reduces recovery opportunities through migration. Reduced survival of individuals in small populations may compromise population viability (Berger 1990, Caughley 1994).

Sheep surveys in the YUCH area started as early as 1973. Since 1997, aerial sheep surveys in YUCH have focused on seven survey areas south of the Yukon River in Units 20E and 25C that compose the core area of the population: 5580 Mountain, Charley River Bluffs, Cirque Lakes, Copper Mountain, Diamond Fork Mountain, Mount Sorenson and Twin Mountain (**Figure 2**). The Ogilvie Mountain

¹ Found in literature as Dall and Dall's sheep. Will be referenced as sheep for the remainder of the analysis.

survey area is within Unit 25B (**Figure 2**, Joly et al. 2018). Sheep surveys were flown in the southwestern portion of YUCH between 1983 and 2009. However, evaluating trends from these surveys has been difficult because areas were not surveyed every year and sheep frequently move between survey areas (Burch 2010). Burch (2010) stated that comparable years include 1997, 1998, 1999, 2001, 2002, and 2009. Based on those surveys, the sheep population appeared stable at that time, with good lamb survival and yearling recruitment (**Figure 3**, Burch 2010).

Major declines in sheep populations occurred across Alaska in 2013 and 2014 due to severe winters. In YUCH, sheep abundance declined by 48% between 2009 and 2015 (**Figure 3**, Joly 2015). In some isolated survey areas, declines were as high as 96%. The winters between 2015 and 2017 were more moderate and it was thought the population might be rebounding (Joly et al. 2018).

The most recent sheep survey conducted July 18-20, 2023, reported large declines, likely driven by difficult winters with deep snow and late springs in 2019-20, 2021-22, and 2022-23. In the core area (**Figure 2**), 70 sheep were detected, consisting of 32 ewe-likes, 13 lambs, 6 yearlings and 19 rams. This amounts to a 68% decrease from the last survey in 2018 of 221 sheep and a 75% decrease from the long-term average of 313 sheep (**Figure 3**, Sorum 2023). The four survey areas with smaller abundance, including: 5580 Mountain, Copper Mountain, Diamond Fork Mountain, and Twin Mountain, experienced the largest declines (93%) when compared to the long-term average. For the first time, no sheep were observed in the Diamond Fork Mountain and Copper Mountain survey areas. The Charley River, Cirque Lakes, and Sorenson survey areas recorded 68% declines from the long-term average. In the Ogilvie Mountains (Unit 25B), 26 sheep were detected (18 ewe-likes, 4 lambs, 0 yearlings, and 4 rams), which is a 28% decline since the 2018 survey. Only two legal rams were observed in the core areas within YUCH during the 2023 surveys (Sorum 2023).

Glacier Mountain Controlled Use Area

The BLM managed Federal public lands comprise approximately 8% of the Glacier Mountain CUA. Most of these lands are lower in elevation, do not include much quality sheep habitat and none are within the ADF&G sheep survey area (Herriges 2023, pers. comm.). However, there is no available information to determine empirically if sheep utilize or are harvested from the Federal public lands within the CUA.

ADF&G conducts aerial surveys within the Glacier Mountain CUA around Glacier Mountain and Mount Eldridge in July to obtain minimum sheep counts. Since 2021, the total number of sheep observed have been well below the long-term average of 78 sheep. Between 2019 and 2021, sheep abundance within the survey area declined approximately 73% (**Table 1**, Herriges 2023, pers. comm.). The total number of sheep observed declined further to only 14 in 2023, and no legal rams were observed since 2021. Additionally, lamb production averaged only 2 lambs/year in recent years (2021-2023), well below the long-term average of 12 lambs (**Table 1**).

Table 1. Glacier Mountain Controlled Use Area sheep minimum population counts and composition from July aerial surveys, 2000–2024 (Herriges 2023 pers. comm.; Hunter 2025 pers. comm.; Gross 2025 pers. comm.)

Year	Ewe-likes ^a	Lambs	Unknown	Sublegal rams ^b	Legal rams ^c	Unidentified rams	Total rams	Total sheep
2000	61	6	0	27	6	0	33	100
2001	50	11	0	18	7	0	25	86
2002	46	15	0	14	2	0	16	77
2003	37	12	0	10	5	0	15	64
2004	48	26	0	19	5	0	24	98
2005	72	20	0	11	5	0	16	108
2006-2011	N/A							
2012	94	8	0	48	9	0	57	159
2013	43	3	0	15	2	0	17	63
2014	57	15	0	23	2	0	25	97
2015	64	21	0	17	1	0	18	103
2016	37	8	0	18	0	0	18	63
2017	63	30	0	18	1	0	19	112
2018	54	12	0	11	0	0	11	77
2019	51	15	0	12	3	0	15	81
2020	N/A							
2021	14	2	1	4	1	0	5	22
2022	11	0	0	1	0	0	1	12
2023	9	4	0	1	0	0	1	14
2024	7	3	0	3	0	0	3	13
2025	8	3	0	3	0	0	3	14
Average	45	12	0	15	3	0	18	75

^a Ewe-likes classification also includes yearlings of both sexes and rams of ¼ curl or less.

^b Greater than ¼ curl but less than full curl.

^c Full curl or larger.

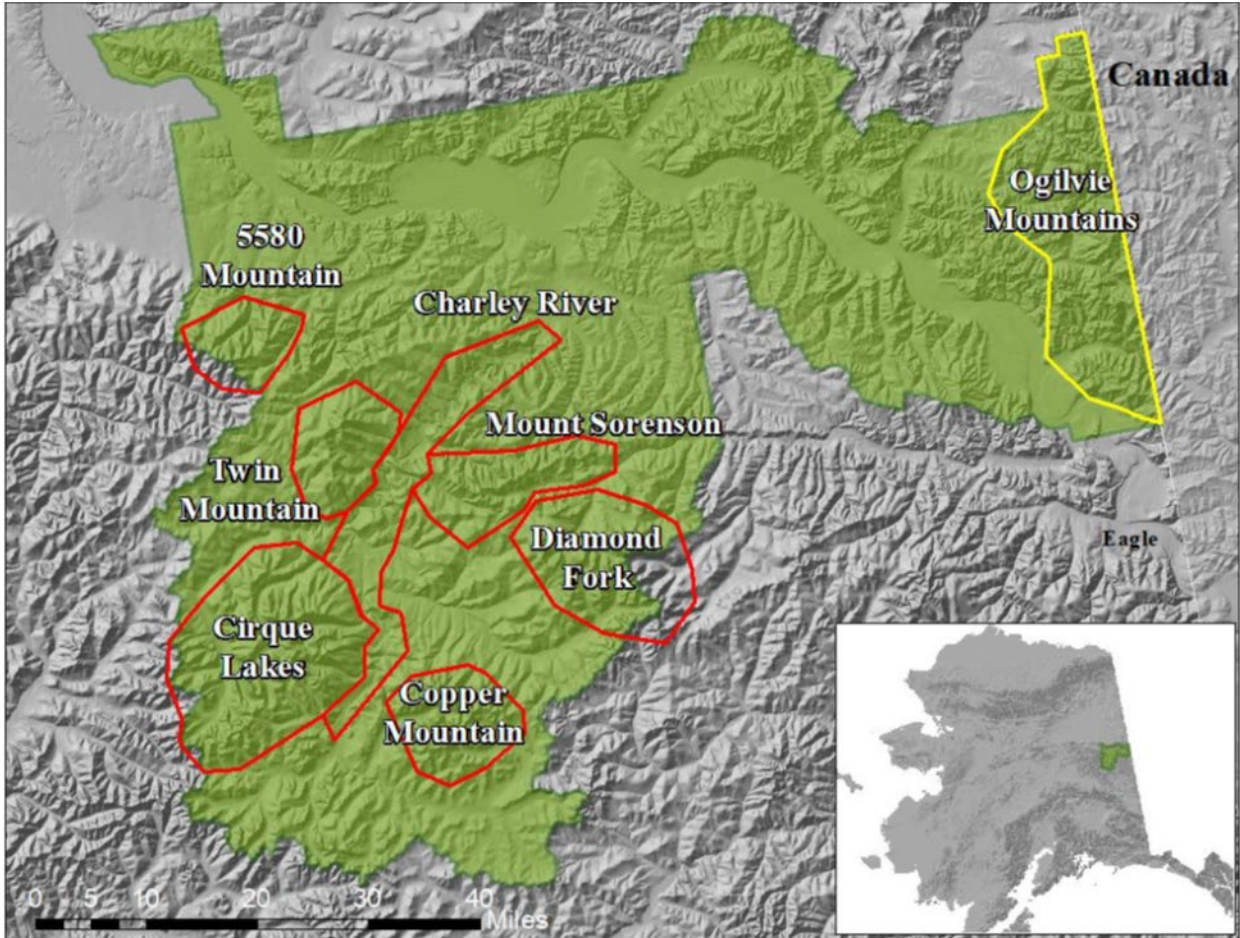


Figure 2. The core seven survey areas surveyed for sheep in YUCH (5580 Mountain, Charley River Bluffs, Cirque Lakes, Copper Mountain, Diamond Fork Mountain, Mount Sorenson, and Twin Mountain) (Joly et al. 2018).

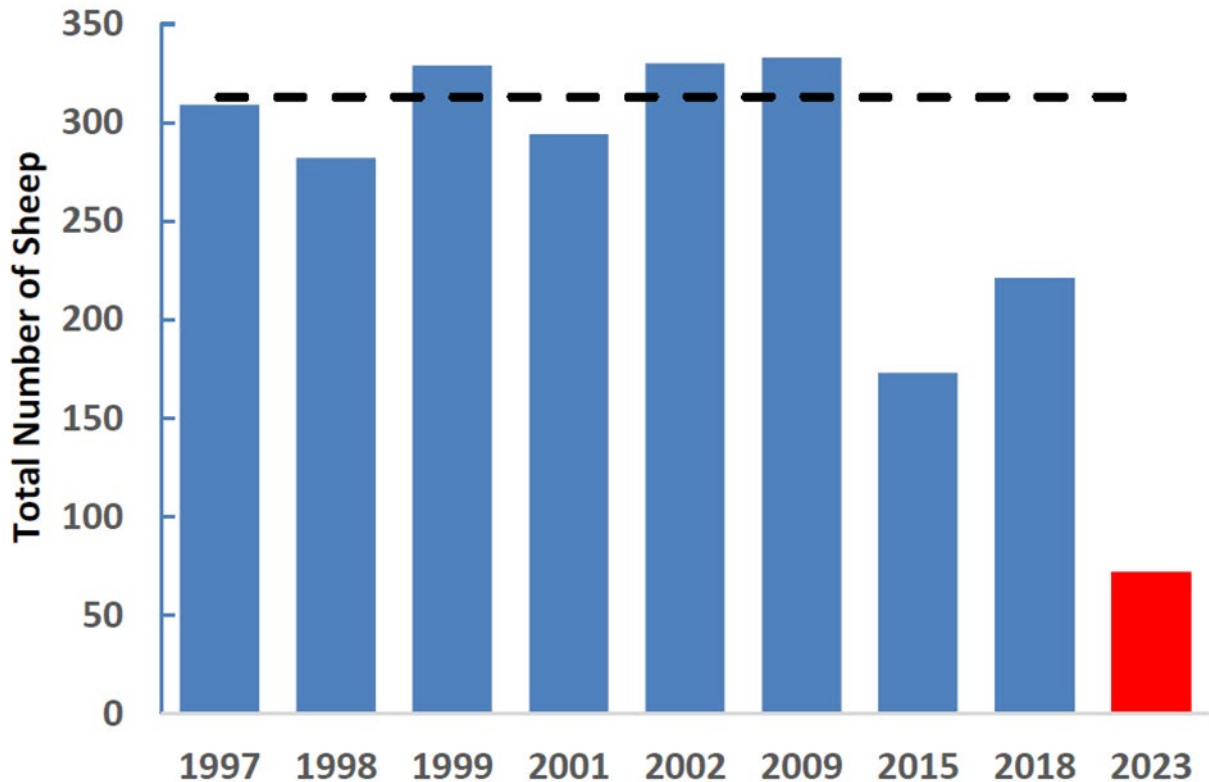


Figure 3. Dall sheep minimum population counts in the core seven survey areas of YUCH, 1997-2023. Black dash line is the average for 1997-2009 (Sorum 2023).

Cultural Knowledge and Traditional Practices

Sheep are an important resource for subsistence users and Eastern Interior Council members are concerned about observed declines in their region. The primary reason cited for these declines is weather related, including heavy snow and rain-on-snow events. One Council member reported seeing increased numbers of bears while sheep hunting and wondered if bear predation might also be a factor. Council members have requested more sheep surveys and intensive study to better understand the declines (EISRAC 2022a, 2022b).

The ADF&G Division of Subsistence, funded by the National Park Service, conducted a comprehensive harvest survey in Eagle and Eagle Village in 2017. During this survey year, there were no sheep harvests reported by the residents of Eagle. A summary of community comments indicated that “Eagle hunters do occasionally hunt Dall sheep, but to do so requires a two to three day walk into the Glacier Mountain area. Sometimes sheep are present on Eagle Bluff or in the mountains across the river from town, but typically residents leave these animals alone and simply enjoy viewing them” (Trainor et al. 2020: 168).

Similar responses came from Eagle Village which also reported no sheep harvests during the 2017 survey year. Summaries of community comments were like those from Eagle, “Dall sheep are another large land mammal that Eagle Village residents occasionally harvest. However, they are not commonly

harvested because of the great effort to reach their habitat at high elevation in the bluffs across the river from the village or near Glacier Mountain” (Trainor et al. 2020: 225).

In contrast to 2017, a combined survey of Eagle and Eagle Village residents in 2004 showed a harvest of four Dall sheep which was shared with others in the community (Trainor et al: 2020: 182; ADFG 2025). Residents are strongly encouraged to share more information about their subsistence Dall sheep hunts, harvests and observations in Units 20E and 25C at the October 2025 Eastern Interior Regional Subsistence Advisory Council meeting in Tok, Alaska. This information is important for the next version of this analysis for the Federal Subsistence Board.

Across Alaska, many rural subsistence users consider sheep an emergency survival food to be harvested when more accessible resources are not available (Pederson et al. 1985). Residents in Arctic Village in the Brooks Range described the use of fallback species and secondary harvest locations when regular resources are not available. They discussed the importance of “...an area and a resource which is not used under normal circumstances but actually provides the basis for household or community survival when other major resource categories fail” (Pederson et al. 1985: 72). First on the list of “emergency” resources is Dall sheep, followed by a few fish species, seals, and small land mammals (Pederson et al. 1985). Fishery closures and moose and caribou declines throughout the upper Yukon River drainage highlight the importance of sheep for subsistence users who find the decreasing numbers of sheep disturbing. One Council member stated, “[I am] concerned about the Dall sheep...[I am] concerned about the numbers because with our challenges with the caribou and the salmon, it is going to be an important food source for us” (EISRAC 2022a: 245).

Sheep hunting in this region is a well-documented Athabascan tradition and is important to more recent settlers of this area. Descriptions of the knowledge of sheep possessed by Han, Gwich’in, Tanacross, and Upper Tanana Athabascans include the location of mineral licks used by sheep. In the past, sheep were most often caught with babiche snares made from long strips of caribou or moose skin, but hunters sometimes took them with bows and arrows. Men hunted sheep in late summer and early fall when sheep were fat and they were in good condition, and to obtain sheepskins for winter. Tallow-rich ribs were favored and eaten fresh. Women dried much of the meat, cached it for later use, and made the skins into sleeping blankets or into warm winter pants and coats. Sheep horns were steamed, bent, and made into highly prized spoons and dippers. Descriptions of sheep hunts were repeated in stories and songs. In years when caribou were not available in significant numbers, moose, sheep, and fish were taken in larger numbers to compensate. In contemporary times, fall continues to be an important sheep hunting season (Caulfield 1979; McKennan 1981; Pedersen and Caulfield 1981; Mishler and Simeone 2004; Haynes and Simeone 2007).

Settlers that live in this region have relied heavily on the harvest of wild resources, especially near the Charley, Kandik, Nation, Tatonduk, Fortymile and Seventymile rivers in the Yukon Charley region throughout the twentieth century (Caulfield 1979).

The Alaska Department of Fish and Game, Division of Subsistence, funded by the National Park Service conducted a comprehensive harvest survey in Eagle and Eagle Village in 2017. During this survey year, there were no sheep harvests reported by the residents of Eagle. A summary of community comments indicated that “Eagle hunters do occasionally hunt Dall sheep, but to do so requires a two to three day walk into the Glacier Mountain area. Sometimes sheep are present on Eagle

Bluff or in the mountains across the river from town, but typically residents leave these animals alone and simply enjoy viewing them” (Trainor et al. 2020: 168).

Similar responses came from Eagle Village which also reported no sheep harvests during the 2017 survey year. Community comments were like those from Eagle, “Dall sheep are another large land mammal that Eagle Village residents occasionally harvest. However, they are not commonly harvested because of the great effort to reach their habitat at high elevation in the bluffs across the river from the village or near Glacier Mountain” (Trainor et al. 2020: 225).

In contrast to 2017, a combined survey of Eagle and Eagle Village residents in 2004 showed a harvest of 4 Dall sheep which was shared with others in the community. Residents are strongly encouraged to share more information about their subsistence Dall sheep hunts, harvests and observations in Units 20E and 25C at the October 2025 Eastern Interior Regional Subsistence Advisory Council meeting in Tok, Alaska. This information is important for the next version of this analysis for the Federal Subsistence Board.

Harvest History

Yukon-Charley Rivers National Preserve

Within the boundaries of YUCH (portions of Unit 20E, 25B, 25C), an average of four rams were reported harvested per year between 1983 and 2007 (**Figure 4**, Joly et al., 2018). An increase in sheep harvest within the YUCH took place after State hunting regulations changed from a drawing permit to a harvest ticket hunt in 1993, and the sheep population appeared stable after this regulation change until 2015 (**Figures 3, 4**; Burch 2010). The highest reported harvest of 12 rams occurred in 2005. After 2005, harvest within YUCH declined substantially, averaging 2.5 rams per year between 2006 and 2017 (**Figure 4**, Joly et al. 2018). Between 2018 and 2022, reported sheep harvest within YUCH declined even further to an average of 1.4 rams per year, ranging from 0–3 rams per year (Mulligan 2023). No legal harvest has occurred since 2022 as YUCH has been closed to sheep hunting (WSA23-05, WSA24-01).

Glacier Mountain Controlled Use Area

Withing the Glacier Mountain CUA, total reported sheep harvest from 2013 - 2023 was 18 rams, with an average of 1.6/year. No harvest was reported in 2022 or 2023. All successful hunters reporting, except for one nonresident, were classified as nonlocal residents (Herriges 2023, pers. comm.). No legal hunting has occurred since 2023 within the Glacier Mountain CUA as the 2024 and 2025 State hunt was closed by EO, and the Federal lands with quality sheep habitat were also closed for the 2024 and 2025 seasons via WSA24-01.

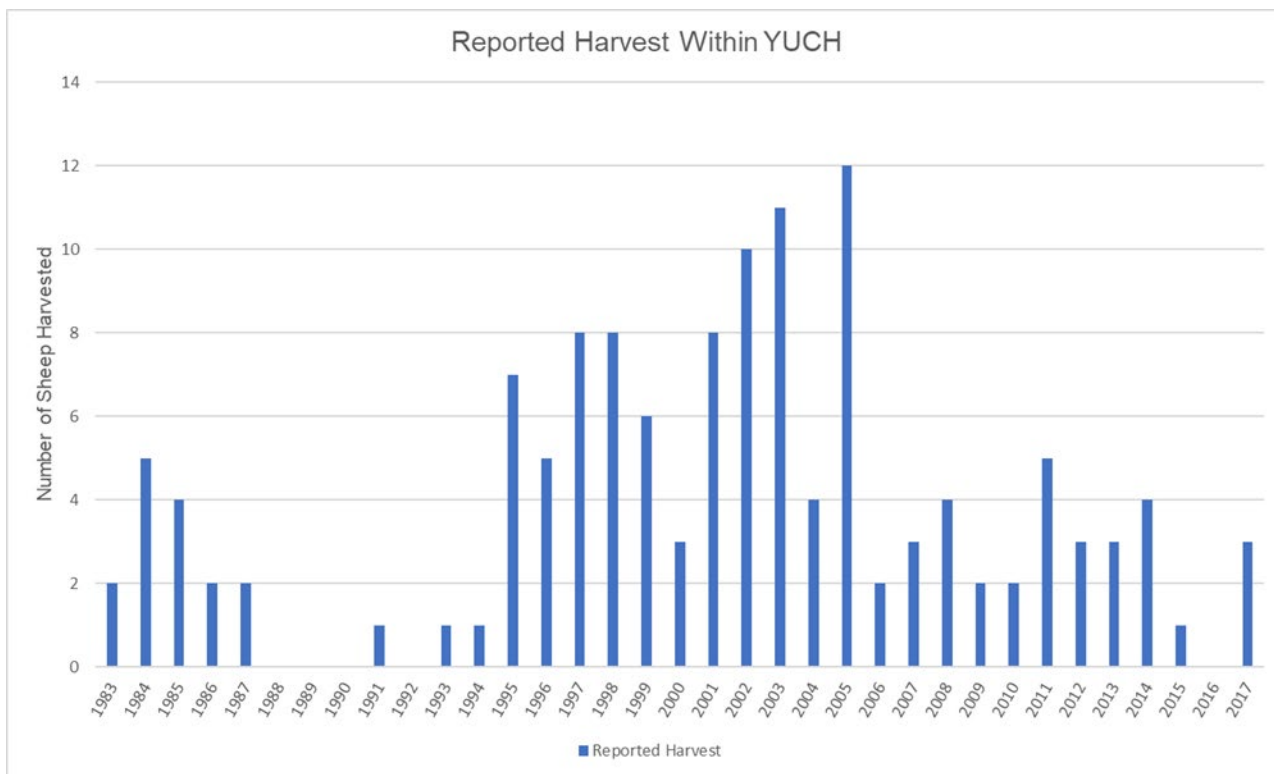


Figure 4. Reported sheep harvest within Yukon-Charley Rivers National Preserve, 1983-2017 (Joly et al. 2018)

Alternative(s) Considered

One alternative considered was to close all Federal public lands within the Glacier Mountain CUA, instead of only the lands in the North Peak Mountain Area. This would reduce regulatory complexity by simplifying the regulatory language and aligning with the current State closures. No impacts on the sheep population or subsistence user opportunity are expected from this modification as the Federal public lands within the Glacier Mountain CUA that are outside of the North Peak Mountain area are low elevation, poor quality sheep habitat where sheep and sheep hunting are very unlikely to occur.

Another alternative considered was to remove the limitation of the closure only being in effect for the 2026 and 2027 regulatory years. This would make the closure permanent until a proposal is submitted to rescind the closure. This alternative would reduce the administrative burden and would not need a proposal every two years to keep the closure in place. However, if this alternative is adopted, then the closure would only be reviewed every four years. As proposed, this closure would need to be addressed again in two years in order to remain in effect for the 2028 and 2029 seasons.

Discussion and Effects

If this proposal is adopted, the Federal public lands within YUCH and the North Peak Mountain area within the Glacier Mountain CUA in Units 20E and 25C will continue to be closed to sheep hunting by all users through the 2026 and 2027 seasons. This would continue the decreased opportunity for federally qualified subsistence users and for anyone hunting under State regulations in the short-term but could help ensure sheep hunting opportunity in the long-term. Federal lands within YUCH in Unit 25B would remain open, which would provide some harvest opportunity within YUCH under both State and Federal regulations. Individuals hunting under State regulations would still be able to harvest sheep on private, State, and other Federal lands outside the closure areas in Units 20E and 25C. This closure of Federal lands could result in displacement of hunters onto these lands.

Adoption of this proposal may aid in the recovery of the YUCH and Glacier Mountain CUA sheep populations by improving the chances of survival for the few remaining rams in the area, which could also increase reproductive success by maintaining more rams in the population for effective breeding. 2023 surveys revealed a dramatic population reduction from the long-term average; the population is now below 25% of the long-term average. Conservation of any remaining rams and minimizing disturbance to these sheep populations will aid in faster recovery and reduce risk of localized extirpation.

OSM CONCLUSION

Support Proposal WP26-76 **with modification** to close all Federal public lands within the Glacier Mountain CUA to sheep hunting by all users for the 2026 and 2027 regulatory years.

The draft regulations read:

Unit 20E– Sheep

Unit 20E—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Federal public lands within Yukon-Charley Rivers National Preserve and within the Glacier Mountain Controlled Use Area, are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.

Unit 25–Sheep

Units 25B, 25C remainder, and 25D—1 ram with full-curl horn or larger *Aug. 10–Sep. 20.*

Unit 25C, within Yukon-Charley Rivers National Preserve ***No open season***

Federal public lands are closed to sheep hunting by all users for the 2026 and 2027 regulatory years.

Justification

Population viability concerns warrant closure to sheep hunting on Federal public lands within YUCH in Units 20E and 25C as well as the Glacier Mountain CUA in Unit 20E by all users under §816(b) of ANILCA. The sheep populations in these areas are naturally small and isolated, making them more susceptible to extirpation during large population declines. Sheep abundance in YUCH within the seven survey areas in Units 20E and 25C has dropped 67% since the 2018 survey and is 77% below the long-term average. Only two legal rams were observed across all survey areas within YUCH during the 2023 surveys. While reported harvest is low (~1.4 rams per year between 2018–2022), any additional mortality could extend the duration of recovery or risk localized extirpation.

While Federal public lands only comprise a small portion of the Glacier Mountain CUA, the population viability concerns for the Glacier Mountain sheep population are extreme. This sheep population has significantly decreased since 2019 to only 14 total sheep observed in 2023. No legal rams have been observed in recent years, and lamb production has additionally been very low in recent years. Total reported harvest from 2013 through 2023 is low, with an average of 1.6/year and no harvest was reported in 2022 or 2023. This indicates there is no harvestable surplus of sheep in this population and any additional mortality could extend the duration of recovery or risk localized extirpation.

Adopting this proposal may help sheep abundance recover within YUCH south of the Yukon River and within the Glacier Mountain CUA, improving their viability. While subsistence hunting opportunity has been reduced for the short-term, it will help preserve opportunity for the long-term by providing additional time for these sheep populations to recover.

Closing all Federal public lands within the Glacier Mountain CUA reduces regulatory complexity by simplifying the regulatory language and aligning with the 2024 and 2025 State closure. This modification has no impact on sheep or subsistence hunters.

LITERATURE CITED

ADF&G. 2024. Emergency order R3-6-24. June 28, 2024. ADF&G, Fairbanks, AK.

ADF&G. 2025. Community Subsistence Information System (CSIS), Alaska Department of Fish and Game, Div. of Subsistence. <https://community-subsistence-information-system-adfg.hub.arcgis.com/> Retrieved: August 8, 2025.

Berger, J. 1990. Persistence of Different-Sized Populations: An Empirical Assessment of Rapid Extinctions in Bighorn Sheep. *Conservation Biology*, 4, 91-98.

- Burch, J. 2010. Aerial Dall sheep survey, Yukon-Charley Rivers National Preserve, Alaska: July 2009 survey report. Natural Resource Technical Report NPS/CAKN/NRTR–2010/367. NPS, Fort Collins, CO.
- Caughley, G. (1994). Directions in Conservation Biology. *Journal of Animal Ecology*, 63, 215-244
<http://dx.doi.org/10.2307/5542>.
- Caulfield, R. 1979. Subsistence use in and around the proposed Yukon-Charley National Rivers. Cooperative Park Studies Unit, University of Alaska, Fairbanks, AK.
- Caulfield, R. 1983. Subsistence land use in Upper Yukon Porcupine communities, Alaska: Dinjii Nats'aa Nan Kak Adagwaandaii. ADF&G Div. of Subsistence Tech. Paper No. 16. Juneau, AK.
- Eagle Advisory Committee. 2024. Letter Requesting delegation of authority to initiate Advisory Committee Emergency Closure per 5 AAC 97.010. April 26, 2024. Eagle, AK. <https://aws.state.ak.us/OnlinePublicNotices/Notices/Attachment.aspx?id=147834>
- EISRAC. 2022a. Transcripts of the Eastern Interior Alaska Subsistence Regional Advisory Council Meeting. October 6, 2022. Fairbanks, AK. Office of Subsistence Management, USFWS. Anchorage, AK.
- EISRAC. 2022b. Transcripts of the Eastern Interior Alaska Subsistence Regional Advisory Council Meeting. October 5, 2022. Fairbanks, AK. Office of Subsistence Management, USFWS. Anchorage, AK.
- EISRAC. 2021. Transcripts of the Eastern Interior Alaska Subsistence Regional Advisory Council Meeting. October 5, 2022. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.
- Gross, J. 2025. Wildlife biologist. Personal communication: email. ADF&G. Tok, AK.
- Haynes, T. L. and W. E. Simeone, 2007. Upper Tanana ethnographic overview and assessment, Wrangell St. Elias National Park and Preserve. ADF&G, Div. of Subsistence Tech. Paper No. 325. Juneau, AK.
- Herriges, J.D. 2023. Wildlife biologist. Personal communication: email. BLM. Fairbanks, AK.
- Hunter, A. 2025. Wildlife biologist. Personal communication: email. ADF&G. Tok, AK.
- Joly, K. 2015. Aerial survey of Dall's sheep: Yukon-Charley Rivers National Preserve, July 2015. Natural Resource Report NPS/YUCH/NRR—2015/1020. National Park Service, Fort Collins, Colorado. 13 pp.
- Joly, K., M. D. Cameron, and M. S. Sorum. 2018. Aerial survey of Dall's sheep within Yukon-Charley Rivers National Preserve, July 2018. Natural Resource Report NPS/YUCH/NRR—2018/1701. National Park Service, Fort Collins, Colorado.
- Mishler, C., and W.E. Simeone. 2004. Han: Hän Hwëch'in, people of the river. University of Alaska Press, Fairbanks, AK.
- McKennan, R.A. 1981. Tanana. Pages 562–576 in J. Helm, editor. *Handbook of North American Indians*, Vol. 6, Subarctic. Smithsonian Institution, Washington, D.C.
- Mulligan, B. 2023. Memorandum to the Federal Subsistence Board on WSA23-05. ADF&G. Anchorage, AK. 2 pp.

Pedersen, P., and R.A. Caulfield. 1981. Some elements of subsistence land and resource use within the range of the porcupine herd in Alaska. ADF&G Div. of Subsistence Tech. Paper No. 3. Juneau, AK.

Pederson, S., M. Coffing, J. Thompson. 1985. Subsistence land use and place name maps for Kaktovik, Alaska. ADF&G, Div. of Subsistence Tech. Paper No. 109. Fairbanks, AK. 150 pp.

Sorum, M. 2023. Dall's Sheep 2023 Survey Summary. Aerial survey of Dall's sheep: Yukon-Charley Rivers National Preserve, July 2023. National Park Service. Fort Collins, Colorado. 1 pp.

Trainor, A. B.M. Trainor, J. Park, H.S. Cold and D. Koster. 2020. The harvest and use of wild foods by four communities bordering the Yukon-Charley Rivers National Preserve: Central, Circle, Eagle, and Eagle Village, 2016 and 2017. ADF&G, Div. of Subsistence Tech Paper No.469. Fairbanks, AK. 380 pp.

Worley K, Strobeck C, Arthur S, Carey J, Schwantje H, Veitch A, Coltman DW. Population genetic structure of North American thinhorn sheep (*Ovis dalli*). *Mol Ecol.* 2004 Sep;13(9):2545-56. doi: 10.1111/j.1365-294X.2004.02248.x. PMID: 15315669.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Eastern Interior Alaska Subsistence Regional Advisory Council

The Council voted to **support** WP26-76 **as modified by OSM** with an additional Council **modification** to remove the sunset clause. The Council submitted this proposal and continues to support it due to significant conservation concerns for sheep. They recommended modifying the proposal to remove their initial suggested timeframe for the closure to sunset, and instead have the closure remain in place and be reviewed every four years, per the Federal Subsistence Board's Closure Policy, until the sheep population can support harvest. Survey data indicates a dramatic population decline for sheep in the area since 2015, and it's important for the closure to remain in place longer to allow time for the sheep population to recover, recruitment to improve, and for younger rams to grow.

The Council also supports the OSM modification to include all federal lands in the Glacier Mountain Controlled Use Area. The Council further noted that sheep populations are down statewide and are experiencing numerous stressors. Heavy snowfall years have resulted in high winter mortality of sheep. Rain on snow events three winters in a row created ice layers, making it difficult for sheep to access forage. Windblown ridges further lock-up habitat, preventing feeding. Predation, especially by Golden Eagles, further depress sheep populations and hampers recovery.

The draft regulations read:

Unit 20E– Sheep

Unit 20E—1 ram with full-curl horn or larger

Aug. 10–Sep. 20.

Federal public lands within Yukon-Charley Rivers National Preserve and within the Glacier Mountain Controlled Use Area, are closed to sheep hunting by all users.

Unit 25–Sheep

Units 25B, 25C remainder, and 25D—1 ram with full-curl horn or larger

Aug. 10–Sep. 20.

Unit 25C, within Yukon-Charley Rivers National Preserve

No open season

Federal public lands are closed to sheep hunting by all users.

INTERAGENCY STAFF COMMITTEE COMMENT

The Interagency Staff Committee found the analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and the Federal Subsistence Board action on this proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Wildlife Proposal WP26-76

This proposal would extend the closure to sheep hunting on federal public land by all users in portions of Unit 25C and 20E through the 2026-2028 wildlife regulatory cycle.

Position

The Alaska Department of Fish and Game (ADF&G) **OPPOSES** extending the closure to sheep hunting on Federal lands for an additional two years. Emergency orders may be issued by ADF&G to close areas to the harvest of sheep when necessary to address public concern outside of conservative full curl management strategy.

Background

Any recent declines in the sheep population were likely caused by weather-related events and not by human harvest. Dall sheep in this area are managed using the conservative full-curl ram harvest management strategy. The full-curl strategy is conservative because it focuses harvest pressure on 1) older-aged animals, 2) males-only, and 3) a small segment of the population. Dall sheep rams on average become full-curl at 8 years of age or older, and previous research has shown that these older rams have naturally higher mortality rates than younger aged rams. Therefore, when hunters harvest a full-curl ram, this has a lower impact on the population compared to harvesting a younger ram because there is a higher likelihood the older ram would have died of natural causes anyways. Additionally, limiting harvest to males-only reduces the impact of harvest on the overall population because male survival rates have a drastically lower impact on population growth compared to female survival rates.

Finally, the full-curl strategy is extremely conservative because full-curl animals compose a very small proportion of most sheep populations. As a result, the number of animals that are legally available to hunters is a small proportion of the population and this imposes a self-limit on overharvest of the population. Taken collectively, the full-curl harvest strategy limits harvest to only older-aged rams and is thus a conservative, self-limiting strategy that allows for hunter opportunity while simultaneously preventing overharvest and has minimum impacts on population growth. Additionally, we can demonstrate that harvest fluctuates proportional to the number of full-curl rams in the population with the full-curl strategy, and harvest of each cohort is proportional to the recruitment of each respective cohort. Therefore, we have high confidence that harvest is dependent on cohort abundance. For instance, harvest data from the Brooks Range (1987-2021; n = 7,476) demonstrates that on average 35% of legal rams harvested are

harvested the first year they are legal (full-curl or 8.), whereas 65% of rams are harvested greater than 9 years of age. This gives us confidence that all legal rams are not immediately harvested annually, and that social structure tends to remain similar across a range of abundances with the full-curl management strategy, corroborating compensatory harvest.

Impact on Federally Qualified Users

If adopted sheep hunting would continue to be closed for the RY 26 and RY 27 hunting seasons forcing FQUs to seek sheep hunting opportunities on state or private lands.

Impact on Other Users

If adopted, sheep hunting would be limited to State or private lands outside of Yukon Charlie National Preserve and the Glacier Mountain Controlled Use Area.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made a “negative” customary and traditional determination for sheep in GMU 25C and has not made a finding for sheep in GMU 20 outside of the Tok and Delta management areas.

Conservation Issues

Although the full-curl harvest strategy is an extremely conservative approach to hunting management, there are times when more conservative strategies are warranted to address public concerns.

Enforcement Issues

If adopted, there would be no additional enforcement issues expected.