Northwest Arctic Subsistence Regional Advisory Council
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Taqulik Hepa, Chairperson
Gates of the Arctic National Park
Subsistence Resource Commission
National Park Service
4175 Geist Road
Fairbanks, Alaska 99709

Dear Ms. Hepa,

The Northwest Arctic Subsistence Regional Advisory Council (Council) appreciates the opportunity to provide comments on the Gates of the Arctic National Park Subsistence Resource Commission's (Commission) Dall's Sheep Management Hunting Plan Recommendation (Plan).

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Northwest Arctic Region. It was established under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region.

The Council held a public meeting in Kotzebue on September 24–25, 2026, and the Council appreciates the National Park Service (NPS) providing a briefing on the Commission's Plan during this meeting. The Council respectfully submits the following comments for consideration on this topic.

First and foremost, the Council has concerns about the Dall's sheep population, which has severely declined across the Northwest Arctic Region. While the NPS has conducted sheep surveys for the past several years on the eastern side of Gates of the Arctic National Park and Preserve (Park), population estimates were extrapolated from these smaller survey areas. Due to logistical limitations, a full park-wide survey has not been completed since 2015, including the portions of the Park within Unit 23. The Council understands that the COVID-19 pandemic and other challenges have impeded surveys and monitoring efforts. However, the actual sheep population could be far below current, extrapolated estimates, as was seen in the Baird and DeLong Mountains, which necessitated the strict hunting closures that remain today. Therefore,

a comprehensive Dall's sheep census is crucial to better understand the health of the population and whether there is a harvestable surplus. This should be done before any management changes are considered that could potentially sustain or increase hunting on this fragile population. With possible development projects like the Ambler Road potentially expanding access to the Park, the Council also has concerns about future hunting pressures.

The Council supports NPS plans to survey the entire population of Dall's sheep throughout the Park in 2027, especially in July, when there is minimal snow. However, the Council voted to withhold its support for the Commission's Plan until this comprehensive census is conducted. The Council recommends prioritizing completing this necessary park-wide survey and supports possibly closing sheep hunting in the Park until this information is obtained. The Council believes Dall's sheep conservation is the safest option to help ensure sustainable harvests for future generations, and a more thorough population census is critical to inform any plans or management decisions for subsistence hunting allocations.

Thank you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Grace Cochon at (907) 317-2165 or grace_cochon@ios.doi.gov.

Sincerely,

Thomas Baker
Chair

cc: Northwest Arctic Subsistence Regional Advisory Council
Gates of the Arctic National Park Subsistence Resource Commission
Mark Dowdle, Superintendent, Gates of the Arctic National Park and Preserve
Marcy Okada, Subsistence Coordinator, Gates of the Arctic National Park and Preserve
Eva Patton, Regional Subsistence Program Manager, National Park Service, Alaska Region
Kim Jochum, Subsistence Program Analyst, National Park Service, Alaska Region
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