WSA26–01 Executive Summary	
General Description	Wildlife Special Action WSA26-01 requests reducing the caribou harvest limit in Units 22, 23, and 26A west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages (Unit 26A SW) to 4 caribou per year, only one of which may be a cow for the 2026/27 regulatory year. *Submitted by: Western Arctic Caribou Herd Working Group.*
Proposed Regulation	**See pages 4-6.**
OSM Conclusion	**Support** Wildlife Special Action WSA26-01 **with modification** to also eliminate the cow hunt and apply these harvest limit restrictions to the entire 2026-2028 regulatory cycle.
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	**Take no action**
Seward Peninsula Subsistence Regional Advisory Council	**Support** WSA26-01 with **modification** to also eliminate the harvest of cows.
Northwest Arctic Subsistence Regional Advisory Council	**Support** WSA26-01 with **modification** to also eliminate the harvest of cows.
North Slope Subsistence Regional Advisory Council Recommendation	**Support** WSA26-01 with **modification** to reduce the caribou harvest limit in Unit 26A SW and the portion of Unit 23 north and west of and including the Singoalik River drainage to 10 caribou, only one of which may be a cow.
ADF&G Comments	None received

WSA26–01 Executive Summary	
ISC Comments	
Public Hearing	**3 Support**

STAFF ANALYSIS
TEMPORARY SPECIAL ACTION
WSA26-01

ISSUES

Temporary Wildlife Special Action WSA26-01, submitted by the Western Arctic Caribou Herd Working Group (WACH Working Group), requests reducing the caribou harvest limit in Units 22, 23, and 26A west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages (Unit 26A SW) to 4 caribou per year, only one of which may be a cow for the 2026/27 regulatory year (**Map 1**).

Note: WSA26-02 and WSA26-03 request closure of Federal public lands in Units 22 and 26A SW, respectively to caribou hunting by non-federally qualified users (NFQUs) for the 2026-2028 regulatory cycle. Those requests are analyzed in separate analyses, but reference this "master" analysis.

Proponent Statement

At its annual meeting in December 2025, the WACH Working Group assigned the management level "Critical, Declining" to the herd based on the current census (less than 130,000, **Table 1**) and an adult cow survival rate of less than 80%. The WACH Working Group identified an immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to stabilize and begin to recover. Data received by the WACH Working Group from an Alaska Department of Fish & Game (ADF&G) biologist illustrates a continual decline in the Western Arctic Caribou Herd (WACH). The July 2025 photo census estimated the herd at 121,000 caribou, representing an approximately 20 percent decline from 2023.

The requested action is to ensure the viability of the Western Arctic Caribou Herd and to continue the subsistence uses of the caribou herd. Without management actions such as harvest restrictions, the herd is expected to continue declining. The critical, declining status of the WACH demonstrates the immediate need for a regulatory change before the next Federal Subsistence Board (Board) cycle as recovery is unlikely under existing regulations.

Existing Federal Regulation

Unit 22—Caribou

Units 22A, that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.	*July 1–June 30.*

Unit 22A, remainder—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.	*July 1-June 30, season may be announced.*
Unit 22B, that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.	*Oct. 1-Apr. 30.* *May 1-Sep. 30, a season may be announced.*
Unit 22D, that portion in the Pilgrim River drainage—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.	*Oct. 1-Apr. 30.* *May 1-Sep. 30, season may be announced*
Units 22C, 22D remainder, 22E remainder—15 caribou, only 1 may be a cow by State registration permit. Calves may not be taken.	*July 1-June 30, season may be announced*

Unit 23−Caribou

Unit 23, that portion which includes all drainages north and west of, and including, the Singoalik River drainage—15 caribou, only 1 may be a cow, by State registration permit as follows:	
Bulls may be harvested.	*July 1–June 30*
Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.	*July 15–Apr. 30*
Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.	
Unit 23, remainder—15 caribou, only 1 may be a cow, by State registration permit, as follows:	
Bulls may be harvested	*July 1–June 30*
Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.	*July 31–Mar. 31*
Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless	

the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Unit 26—Caribou

Unit 26A—west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages—15 caribou, only 1 may be a cow, by State registration permit as follows:

Calves may not be taken.	
Bulls may be harvested.	*July 1-Oct. 14.* *Dec. 6-June 30.*
Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15.	*July 16-Mar. 15.*

Proposed Federal Regulation

Unit 22—Caribou

*Unit 22B, that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage—**4** ~~15~~ caribou, only 1 may be a cow by State registration permit. Calves may not be taken.*	*Oct. 1-Apr. 30.* *May 1-Sep. 30, a season may be announced.*
Units 22A, that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek	*July 1–June 30.*

*drainage—**4 ~~15~~** caribou, only 1 may be a cow by State registration permit. Calves may not be taken.*	
*Unit 22A, remainder—**4 ~~15~~** caribou, only 1 may be a cow by State registration permit. Calves may not be taken.*	*July 1-June 30, season may be announced.*
*Unit 22D, that portion in the Pilgrim River drainage—**4 ~~15~~** caribou, only 1 may be a cow by State registration permit. Calves may not be taken.*	*Oct. 1-Apr. 30. May 1-Sep. 30, season may be announced*
*Units 22C, 22D remainder, 22E remainder—**4 ~~15~~** caribou, only 1 may be a cow by State registration permit. Calves may not be taken.*	*July 1-June 30, season may be announced*

Unit 23−Caribou

*Unit 23, that portion which includes all drainages north and west of, and including, the Singoalik River drainage—**4 ~~15~~** caribou, only 1 may be a cow, by State registration permit as follows:*	
Bulls may be harvested.	*July 1–June 30*
Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.	*July 15–Apr. 30*
Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.	
*Unit 23, remainder—**4 ~~15~~** caribou, only 1 may be a cow, by State registration permit, as follows:*	
Bulls may be harvested	*July 1–June 30*
Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.	*July 31–Mar. 31*

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Unit 26—Caribou

Unit 26A—west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages—~~4~~ ~~15~~ caribou, only 1 may be a cow, by State registration permit as follows:

Calves may not be taken.	
Bulls may be harvested.	*July 1-Oct. 14.*
	Dec. 6-June 30.
Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15.	*July 16-Mar. 15.*

Existing State Regulation

Unit 22—Caribou

22A, north of the Golsovia River drainage	*Residents—Fifteen caribou total, only one of which may be a cow by permit.*	
	Bulls RC800	*No closed season*
	Cows RC800	*July 1-Mar. 31.*
	Nonresidents—1 bull HT	*Aug. 1-Sep. 30*
22A, remainder	*Residents— Fifteen caribou total, up to 5 per day by permit. Bulls may not be taken Oct. 15- Jan*	*May be announced*

	31, and cows may not be taken Apr 1- Aug 31. RC800	
	Nonresidents—1 bull HT	*May be announced*
22B, west of Golovnin Bay, west of the west banks of Fish and Niukluk rivers below the Libby River, (excluding the Libby River drainage and Niukluk River drainage above, the mouth of the Libby River)	*Residents— Fifteen caribou total, up to 5 per day, only one of which may be a cow by permit. Cows may not be taken Apr. 1-Aug. 31. RC800*	*May be announced*
	Nonresidents—1 bull	*May be announced*
		May be announced
22B, remainder	*Residents— Fifteen caribou total, only one of which may be a cow by permit.*	
	Bulls RC800	*No closed season*
	Cows RC800	*July 1-Mar. 31.*
	Nonresidents—1 bull HT	*Aug. 1-Sep. 30*
22C	*Residents— Fifteen caribou total, up to 5 per day by permit. Bulls may not be taken Oct 15-Jan 31, and cows may not be taken Apr 1-Aug 31. RC800*	*May be announced*
	Nonresidents—1 bull HT	*May be announced*
22D, Pilgrim River drainage	*Residents— Fifteen caribou total, up to 5 per day, only one of which may be a cow by permit. Cows may not be taken Apr 1-Aug 31. RC800*	*May be announced*
	Nonresidents—1 bull HT	*May be announced*
22D, in the Kuzitrin River drainage (excluding the Pilgrim River drainage) and the Agiapuk River drainage	*Residents— Fifteen caribou total, only one of which may be a cow by permit.*	
	Bulls RC800	*No closed season*
	Cows RC800	*July 1-Mar. 31.*

	Nonresidents—1 bull HT	*Aug. 1-Sep. 30*
22D, remainder	*Residents— Fifteen caribou total, up to 5 per day by permit. Bulls may not be taken Oct 15- Jan 31, and cows may not be taken Apr 1 – Aug 31. RC800*	*May be announced.*
	Nonresidents—1 bull HT	*May be announced*
22E, east of and including the Sanaguich River drainage	*Residents— Fifteen caribou total, only one of which may be a cow by permit.*	
	Bulls RC800	*No closed season*
	Cows RC800	*July 1-Mar. 31.*
	Nonresidents—1 bull HT	*Aug. 1-Sep. 30*
22E, remainder	*Residents— Fifteen caribou total, up to 5 per day by permit. Bulls may not be taken Oct 15- Jan 31, and cows may not be taken Apr 1 – Aug 31. RC800*	*May be announced*
	Nonresidents—1 bull HT	*May be announced*

Unit 23—Caribou

23, north of and including the Singoalik River drainage	*Residents— Fifteen caribou total, only one of which may be a cow by permit. RC907*	*No closed season*
	Nonresidents—1 bull DC923	*Aug. 1-Sep. 30*
23 remainder	*Residents— Fifteen caribou total, only one of which may be a cow by permit.*	
	Bulls RC907	*No closed season*
	Cows RC907	*Sep. 1-Mar. 31.*
	Nonresidents—1 bull DC923	*Aug. 1-Sep. 30*

Unit 26—Caribou

26A, Colville River drainage upstream from the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages.	*Residents— Fifteen caribou total, only one of which may be a cow by permit. RC907*	*No closed season*
	Nonresidents—1 bull HT	*July 15-Sep. 30*

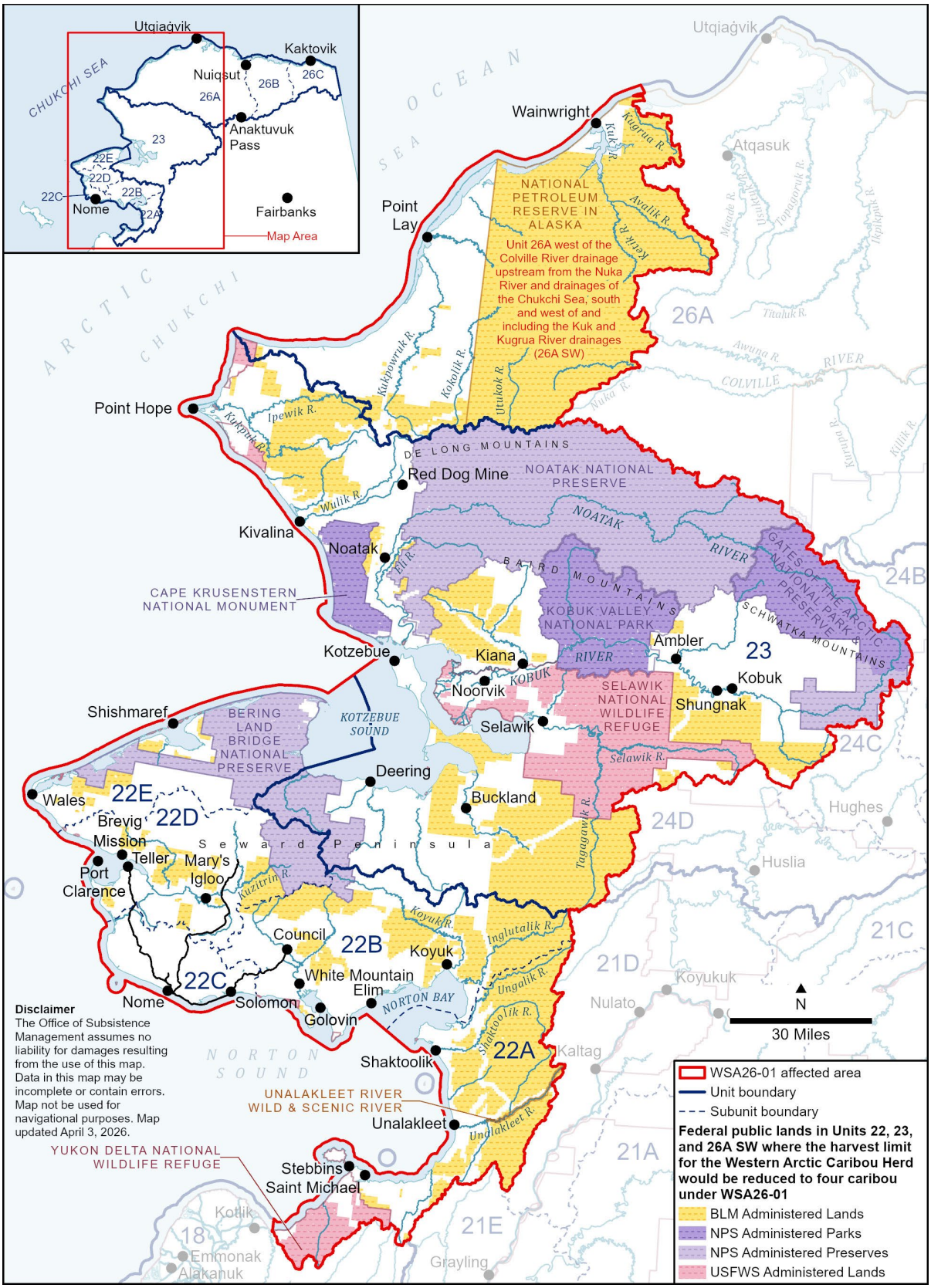
Extent of Federal Public Lands

Federal public lands comprise approximately 43.5% of Unit 22 and consist of 28.1% Bureau of Land Management (BLM) managed lands, 12.4% National Park Service (NPS) managed lands, and 3% U.S. Fish and Wildlife Service (USFWS) managed lands.

Federal public lands comprise approximately 70.5% of Unit 23 and consist of 39.6% NPS managed lands, 21.8% BLM managed lands, and 9.1% USFWS managed lands.

Federal public lands comprise approximately 72.7% of Unit 26A and consist of 66% BLM managed lands, 6.6% NPS managed lands, and 0.01% USFWS managed lands.

Federal public lands comprise approximately 61.6% of Unit 26A SW and consist of 30.3% BLM managed lands, 25.4% NPS managed lands, and 5.8% USFWS managed lands (**Map 1**).



Map 1. Units affected by special action request (Units 22, 23, and portion of 26A).

Customary and Traditional Use Determinations

Residents of Units 21D west of the Koyukuk and Yukon Rivers, 22 (except residents of St. Lawrence Island), 23, 24, Kotlik, Emmonak, Hooper Bay, Scammon Bay, Chevak, Marshall, Mountain Village, Pilot Station, Pitka's Point, Russian Mission, St. Marys, Nunam Iqua, and Alakanuk have a customary and traditional use determination for caribou in Unit 22A.

Residents of Units 21D west of the Koyukuk and Yukon Rivers, 22 (excluding residents of St. Lawrence Island), 23, and 24 have a customary and traditional use determination for caribou in Unit 22 remainder.

Residents of Units 21D west of the Koyukuk and Yukon Rivers, 22, 23, 24 (including residents of Wiseman but not other residents of the Dalton Highway Corridor Management Area), 26A, and Galena have a customary and traditional use determination for caribou in Unit 23.

Residents of Unit 26, Anaktuvuk Pass and Point Hope have a customary and traditional use determination for caribou in Unit 26A.

Under the guidelines of the Alaska National Interest Lands Conservation Act (ANILCA), National Park Service regulations identify qualified local rural subsistence users in national parks and national monuments by: (1) identifying Resident Zone Communities that include a significant concentration of people who have customarily and traditionally used subsistence resources on park lands; and (2) identifying and issuing subsistence use (§13.440) permits to individuals residing outside the Resident Zone Communities who have a personal or family history of subsistence use within the park or monument.

Communities must have a customary and traditional use determination for caribou and be Resident Zone Communities under NPS regulations for residents to be eligible to hunt caribou in national parks and monuments. The Resident Zone Communities for Kobuk Valley National Park and Cape Krusenstern National Monument in Unit 23 include all NANA Regional Corporation communities (all Unit 23 communities except Point Hope). A portion of Gates of the Arctic National Park is also located within Unit 23. Resident zone communities for Gates of the Arctic National Park include Alatna, Allakaket, Ambler, Anaktuvuk Pass, Bettles/Evansville, Hughes, Kobuk, Nuiqsut, Shungnak, and Wiseman. All Resident Zone Communities within Unit 23 also have a customary and traditional use determination for caribou within Unit 23.

Regulatory History

See **Appendix 1**

Current Events

Temporary Wildlife Special Action WSA26-02, submitted by the Bering Land Bridge National Preserve (BELA), requests closing Federal public lands in Units 22 to caribou hunting by NFQUs for the 2026-2028 regulatory cycle.

Temporary Wildlife Special Action WSA26-03, submitted by the North Slope Subsistence Regional Advisory Council (North Slope Council) requests closing Federal public lands in Unit 26A SW to caribou hunting by NFQUs for the 2026-2028 regulatory cycle.

The Kobuk Valley National Park (KOVA) Subsistence Resource Commission (SRC) and the Gates of the Arctic National Park (GAAR) SRC voted to support WSA26-01 with modification to eliminate cow harvest. KOVA SRC stated that while they are concerned for those who may need a cow to put food on the table, the WACH population cannot support it. The future of the herd relies on taking a little more time to look for bulls. They also noted that it will be important to align State and Federal regulations, and that there needs to be outreach and education about why there should be no harvest of cows. GAAR SRC said that with the WACH declining, there are no extra caribou and female caribou only have one calf. The SRC would like to avoid a full closure, as occurred in the 1970s, and it is vital to preserve the herd for future generations. Hunters should be able to tell the difference between a cow and bull.

The Cape Krusenstern National Monument SRC also supported WSA26-01 with modification to eliminate cow harvest, but without specifying a limit on bull harvest (Creek 2025, pers. comm). The SRC stated that this is a difficult decision, and there are mixed feelings, but there is no choice, given the continuous decline and the need to maximize the number of cows in the herd.

Public Hearing Summary

A public hearing was held for WSA26-01, -02, and -03 on April 9, 2026, by teleconference, and 11 people testified. Six of these callers were from the affected region. Local communities represented on the call included Utqiaġvik, Kotzebue, Nome, Point Hope, and Nuiqsut. Not all callers commented or had a position on every Special Action Request.

WSA26-01

Three callers voiced their support for WSA26-01. This included one representative of Resident Hunters of Alaska, an air transporter, and a resident of Nome. The representative of Resident Hunters of Alaska stated that he was in strong support of a reduction in harvest limits, which has been needed for some time. The transporter who spoke in support of WSA26-01 added that he believes that all hunters, not just federally qualified subsistence users, should be subject to a reduced bag limit. Both stressed the importance of also eliminating cow harvest, which they said has been a very significant factor contributing to the decline of the herd. The need to eliminate cow harvest was echoed by a biologist from Utqiaġvik who said he is very concerned about the herd. The importance of reporting harvest so that managers can be more effective was also noted. The resident of Nome simply stated that as a subsistence user, she supported WSA26-01.

A caller representing the North Slope Borough Department of Wildlife Management did not state her support or opposition but asked the Board to honor the North Slope Council's recommendation. One caller from Point Hope said that he could not state his support or opposition to any of the requests, because he felt there had not been enough information sharing about their potential impacts with local hunters. However, he said that if local hunters are going to be restricted, then there should be alternative resources and hunts made available to them. No callers stated that they were in opposition to WSA26-01.

WSA26-02 and WSA26-03

Four callers were in support of WSA26-02, and six were opposed. For WSA26-03, three callers expressed their support, and six were opposed. Those in support of the closures were from the region, with two individuals representing the North Slope Borough Department of Wildlife Management, one resident of Nome, and one resident of Nuiqsut commenting. Those in opposition included air transporters, a representative of ADF&G, Resident Hunters of Alaska, and two non-local Alaska residents.

Callers in support of the closures said that such measures are justified because the herd is in critical, declining status and emphasized that federally qualified subsistence users have already taken a substantial reduction to their harvest limit. A caller who identified as a subsistence hunter and whaling captain's wife emphasized the degree to which her community relies on the herd, and said that she sees many sport hunters and no enforcement. A caller representing the North Slope Borough Department of Wildlife Management asked the Board to consider the Councils' comments and the communities' needs, while also acknowledging the critical decline of the WACH population.

Speakers in opposition to these two special actions shared the view that closing areas to NFQUs would not meaningfully improve the caribou herd's condition. The representative from ADF&G, along with the caller from Resident Hunters of Alaska and both non-local Alaskan residents, emphasized that NFQUs take a very small number of bulls and argued that they are not contributing to the herd's decline. They urged the Board not to override ADF&G's management approach and argued that proposals should instead go through the Alaska Board of Game, where distinctions between residents and nonresidents can be addressed without broad Federal closures.

Both transporters echoed these points and expanded on the practical and economic consequences these closures would create. They stressed that NFQUs plan their hunts far in advance, meaning closures would result in significant financial losses for hunters, local businesses, and ADF&G. The transporters also highlighted a shared concern that removing NFQUs from these areas would sharply reduce predator harvest, which could negatively affect the WACH by allowing wolf and bear predation to increase. Several speakers emphasized that more targeted measures, such as addressing cow harvest rather than imposing full closures, would be both more effective for herd recovery and conservation, and less harmful to the broader hunting public.

Biological Background

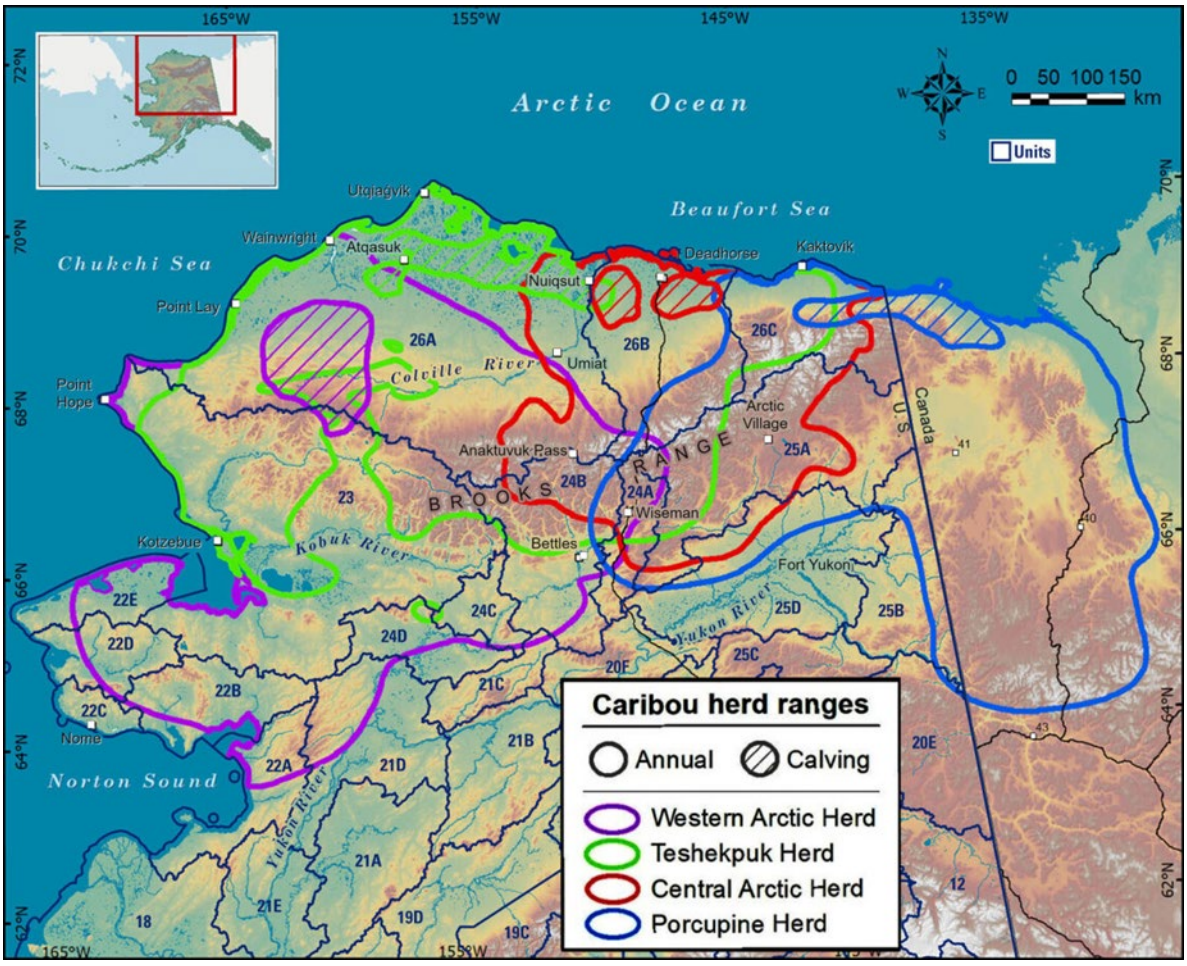
The Teshekpuk Caribou Herd (TCH), WACH, and Central Arctic Caribou Herd (CACH) have ranges that overlap in Units 23, 26A, 24A, and 24B (**Map 2**), and there can be considerable mixing of herds during the fall and winter (Prichard et al. 2020). As the current wildlife special action focuses on conservation concerns for the WACH, this analysis will focus on the WACH. The TCH primarily occupies Unit 26A, and this analysis will briefly consider TCH biology and range. The CACH, which mostly occurs in Unit 26B, (Dau 2011, 2015; Lenart 2011; Parrett 2011, 2015c, 2015d), will not be considered further in this analysis.

Caribou abundance naturally fluctuates over decades (Gunn 2003; WACHWG 2011). Gunn (2003) reports the mean doubling rate for Alaskan caribou as 10 ± 2.3 years. Although the underlying mechanisms causing these fluctuations are uncertain, climatic oscillations (i.e., Arctic and Pacific Decadal Oscillations) may play an important role (Gunn 2003; Joly et al. 2011). Climatic oscillations can influence factors such as snow depth, icing, forage quality and growth, wildfire occurrence, insect levels,

and predation, which all contribute to caribou population dynamics (Joly et al. 2011). Density-dependent reduction in forage availability, resulting in poorer body condition may exacerbate caribou population fluctuations (Gunn 2003).

Caribou calving generally occurs from late May to mid-June (Dau 2013; Cameron et al. 2018). Weaning generally occurs in late October and early November before the breeding season (Taillon et al. 2011). Calves may stay with their mothers through their first winter, which improves calves' access to food and body condition (Holand et al. 2012). Calves orphaned after weaning (October) have greater chances of survival than calves orphaned before weaning (Russell et al. 1991; Joly 2000; Holand et al. 2012, Rughetti and Festa-Bianchet 2014).

Caribou feed on a wide variety of plants including lichens, fungi, sedges, grasses, forbs, and twigs of woody plants. Arctic caribou depend primarily on lichens during the fall and winter, but during summer they feed on leaves, grasses, and sedges (Miller 2003; Joly and Cameron 2018).



Map 2. Herd overlap and ranges of the WACH, TCH, CACH, and PCH (Prichard et al. 2020).

Western Arctic Caribou Herd

The WACH has historically been the largest caribou herd in Alaska and has a home range of approximately 157,000 square miles in northwestern Alaska. In the spring, most mature cows move north to calving grounds in the Utukok Hills, while bulls and immature cows lag behind and move toward summer range in the Wulik Peaks and Lisburne Hills (**Map 3**; Dau 2011; WACHWG 2011, 2019). After calving, cows and calves move west toward the Lisburne Hills where they mix with the bulls and non-maternal cows. During the summer, the herd moves rapidly to the Brooks Range. Calving locations of individuals average 35 miles apart from one year to the next, and 90% of females calved within one week from the previous year (Joly et al. 2021). The WACH has used the same general calving grounds for more than 100 years (Cameron et al. 2020).

Except for summer periods, little individual site-specific fidelity is observed from year to year, especially during the winter (Joly et al. 2021). The winter range fluctuates year to year as the WACH demonstrates low fidelity to wintering grounds (Joly et al. 2021). Rut occurs during fall migration (Dau 2011, WACHWG 2011). The fall migration is more variable and shows less fidelity to specific migration routes than the spring migration, when caribou still show a fidelity to certain regions within the herd's range (Joly et al. 2021).

In recent years, the timing of fall migration has been less predictable (Joly et al. 2021). Reasons for changes in migration phenology are unknown. However, Cameron et al. (2021) found that WACH migrated in response to snow events and cold temperatures but would pause migration when they encountered snow free areas or warmer temperatures. This corresponds with Traditional Ecological Knowledge, which has observed caribou migrating in response to weather (NWARAC 2021b). Caribou migrations are also closely related to the population size and density of the herd (Burch 1972, Joly et al. 2021b).

The proportion of caribou using certain migration paths also varies each year (**Figure 1**, Baltensperger and Joly 2019; Joly and Cameron 2020). Changes in migration paths are likely influenced by multiple factors including food availability, snow depth, rugged terrain, and dense vegetation (Nicholson et al. 2016; Fullman et al. 2017). If caribou traveled the same migration routes every year, their food resources would likely be depleted (NWARAC 2016). Anthropogenic factors can also influence migration paths. Radio collared caribou data have shown that the Red Dog Mine Road, near Kivalina, has delayed the fall migration along the coast with some caribou turning around rather than crossing the road (Wilson et al. 2016, WACHWG 2021).

The WACH Working Group consists of a broad spectrum of stakeholders, including subsistence users, sport hunters, conservationists, hunting guides, reindeer herders and transporters. The WACH Working Group is technically supported by NPS, USFWS, BLM, and ADF&G personnel. The WACH Working Group developed a WACH Cooperative Management Plan in 2003 and revised it in 2011 and 2019 (WACHWG 2011, 2019). The WACH Management Plan identifies nine plan elements: cooperation, population management, habitat, regulations, reindeer, knowledge, education, human activities, and changing climate, as well as associated goals, strategies, and management actions. As part of the population management element, the WACH Working Group developed a guide to make specific

recommendations on herd management determined by population size, population trend, and harvest rate. Population sizes guiding management level determinations were based on recent (since 1970) historical data for the WACH (WACHWG 2011, 2019). Revisions to recommended harvest levels under liberal and conservative management were made in 2015 (WACHWG 2015) and 2019 (WACHWG 2019a, **Table 1**).

The WACH population declined rapidly in the early 1970s, bottoming out at about 75,000 animals in 1976. Aerial photocensuses have been used since 1986 to estimate population size. The WACH population increased throughout the 1980s and 1990s, peaking at 490,000 animals in 2003 (**Figure 2**). From 2003-2016, the herd declined at an average annual rate of 7.1% from approximately 490,000 caribou to 200,928 caribou (Dau 2011, 2014; Caribou Trails 2014; Parrett 2016). In 2017, the herd increased to an estimated 259,000 caribou (Parrett 2017a). However, part of this increase may have been due to improved photographic technology as ADF&G switched from film to higher resolution digital cameras. The 2019 population estimate was 244,000 caribou (Hansen 2019a). No photocensus was completed in 2020, but in 2021, the population estimate was 188,000 caribou with a 95% confidence interval of +/- 11,855 and a minimum count of 180,374. This is approximately a 24% decline from the 2019 population estimate (WACHWG 2021). The 2022 population estimate was 164,000 caribou with a 95% confidence interval of +/- 7,271 and a minimum count of 161,034, representing an additional 12% decline (**Figure 4**, WACHWG 2022). The population declined an additional 7.6%, to approximately 152,000 caribou in 2023 (WACHWG 2023). No photocensus was completed in 2024 due to weather limiting flights when caribou were sufficiently aggregated (WACHWG 2024). The 2025 population estimate was 121,000 caribou with a 95% confidence interval of +/- 15,104, and a minimum count of 98,206, representing an additional 20% decline since the 2023 count (WACHWG 2025).

Between 1982 and 2012, the WACH population was within the liberal management level prescribed by the WACH Working Group (**Figure 4, Table 1**). In 2013, the herd population estimate fell below the population threshold for liberal management of a decreasing population (265,000), slipping into the conservative management level. In 2020, as no photocensus was completed, the WACH Working Group voted to maintain the herd's status at the conservative declining level (WACHWG 2020). The 2021 population estimate fell below the population threshold for conservative management of a decreasing population (200,000). The WACH Working Group voted to place the herd in the preservative declining level in 2021, 2022, 2023 and 2024 (WACHWG 2021, 2022, 2023,2024). During its 2025 meeting, the WACH Working Group voted to place the herd in the critical declining management level. The group also proposed a total moratorium on hunting of WACH caribou if its population falls below 75,000 animals, with hunting only to resume when the population again reaches 100,000 caribou. (WACHWG 2025).

Between 1970 and 2025, the bull:cow ratio exceeded the Critical Management level of 30 bulls:100 cows identified in the 2019 WACH Management Plan (**Figure 5**). (Note: Previous management plans identified 40 bulls:100 cows as the critical management level). However, the average annual number of bulls:100 cows was greater during the period of population growth (54:100 between 1976–2001) than during the recent period of decline (44:100 between 2004-2016). However, in 2017 the bull:100 cow ratio was the highest since 1998 at 54 bulls:100 cows. In 2021, that ratio fell slightly to 47 bulls:100 cows and was 50 bulls:100 cows in 2023 and 44 bull:100 cows in 2024 (**Figure 5,** WACHWG 2021, 2023, 2025).

Additionally, Dau (2015) states that while trends in bull:cow ratios are accurate, actual values should be interpreted with caution due to sexual segregation during sampling and the inability to sample the entire population, which likely accounts for more annual variability than actual changes in composition.

Although factors contributing to the 2003-present decline are not known with certainty, increased adult cow mortality, and decreased calf recruitment and survival have played a role (Dau 2011, WACHWG 2022). Since the mid-1980s, adult mortality has slowly increased while recruitment has slowly decreased (**Figure 6**, Dau 2013). Prichard (2009) developed a population model specifically for the WACH using various demographic parameters and found adult cow survival to have the largest impact on population size, followed by calf survival and then parturition rates. The ADF&G biologist for the WACH stated that the continued decline of the WACH is likely until cow survival improves (WACH 2025).

Calf production has likely had little influence on the population trajectory (Dau 2013, 2015). Between 1990 and 2003, the June calf:cow ratio averaged 66 calves:100 cows/year. Between 2004 and 2017, the June calf:cow ratio averaged 72 calves:100 cows/year. In June 2018, 86 calves:100 cows were observed, which approximates the highest parturition level ever recorded for the herd (86 calves:100 cows in 1992) (Dau 2016a, WACHWG 2021). The 5-year period from 2015-2019 had the highest (83%) parturition rate of any period since monitoring began. In 2023, the June calf:cow ratio was 77 calves:100 cows, then rebounded to 83 calves:100 cows in 2025. The long-term average (1992-2025) is 70 calves:100 cows/year (**Figure 7**, WACHWG 2025, NWARAC 2023).

Decreased calf survival through summer and fall and recruitment into the herd may have contributed to the recent population decline (Dau 2013, 2015). Fall calf:cow ratios indicate calf survival over summer. Between 1976 and 2017, the fall calf:cow ratio ranged from 35 to 59 calves:100 cows/year, averaging 47 calves:100 cows/year (**Figure 7**).

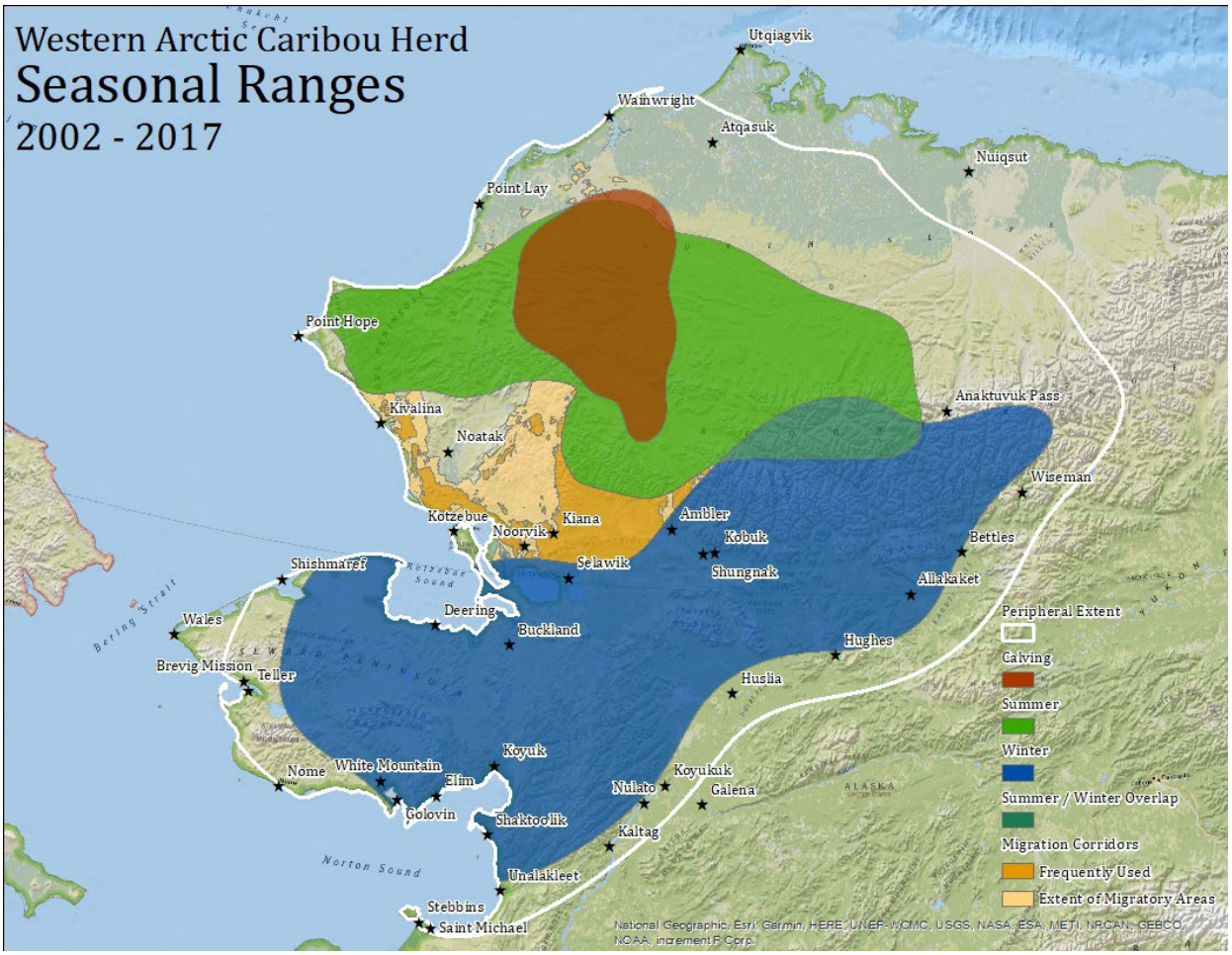
Similarly, the ratio of short yearlings (SY, 10-11 months old caribou) to adults provides a measure of overwintering calf survival and recruitment. Between 1998 and 2025, SY:adult ratios ranged from 9-26 and averaged 17 SY:100 adults/year (**Figure 7,** WACHWG 2025). SY:100 adult ratios were high from 2016-2018, ranging from 21-23 SY:100 adults (Dau 2016b, NWARAC 2019, NWARAC 2023). The 2025 SY:100 adult ratio was on par with the long-term average at 17 SY:100 adults (WACHWG 2025). Over the past eight years the short yearling ratio has been at or above the long-term average. Thus, recruitment does not appear to be a major driver of herd decline.

Cow survival affects the trajectory of the herd (Dau 2011, 2013, Prichard 2009, NWARAC 2019) and is likely the factor driving the herd's decline (WACHWG 2023). Prichard (2009) and Dau (2015) suggest that harvest levels and rates of cows can greatly impact population trajectory. The long-term survival rate of radio-collared adult cows averaged 80% from 1987-2025 (WACHWG 2025). The annual survival rate decreased from an average of 85% between 1987 and 2003 to 77% from 2004-2014 (Figure 4, Dau 2011, 2013, 2014, 2015). Survival rates increased in 2015 and 2016 but then declined sharply in 2017. However, the decreased survival rate in 2017 may have been due to a low and aging sample size as few caribou were collared in the previous two years (Prichard et al. 2012, NWARAC 2019) and/or difficult

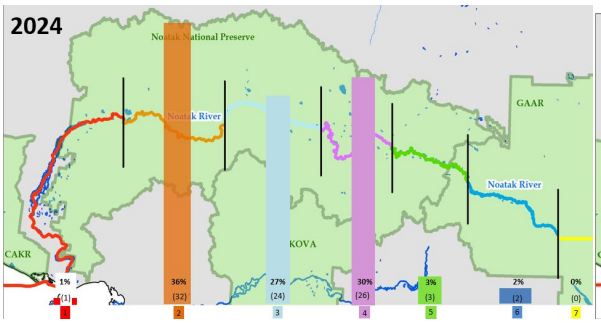
weather conditions (Gurarie et al. 2020). Survival rates from 2017-2024 remained below the long-term average, except for 2021. The 2024 survival rate was 79% (**Figure 6**, WACH 2025).

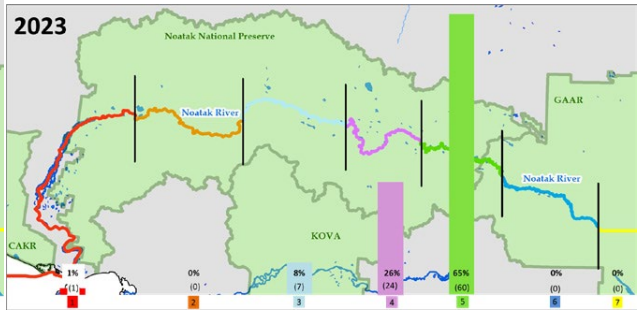
Estimated mortality includes all causes of death including hunting (Dau 2011). Over half of cow mortality is attributed to predation, while 5-29% has been attributed to hunting each year since 2006 (WACHWG 2023). Dau (2015) states that cow mortality estimates are conservative due to the exclusion of unhealthy (i.e. diseased) and yearling cows from collaring. These mortality estimates are influenced by the age at which individuals were collared (which is unknown), sample size and how long the collars have been on individuals (Dau 2015, Prichard et al. 2012).

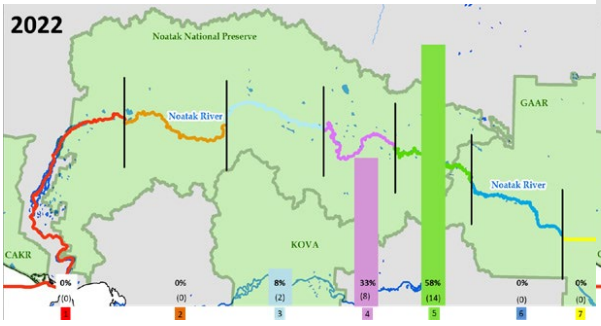
Increased predation, hunting pressure, deteriorating range condition (including habitat loss and fragmentation), climate change, fall and winter icing events, and disease may be contributing factors to the population decline (Joly et al. 2011; Dau 2014, 2015). Joly et al. (2007) documented a decline in lichen cover in portions of the wintering areas of the WACH, which continued through at least 2015 (BLM, unpublished data).

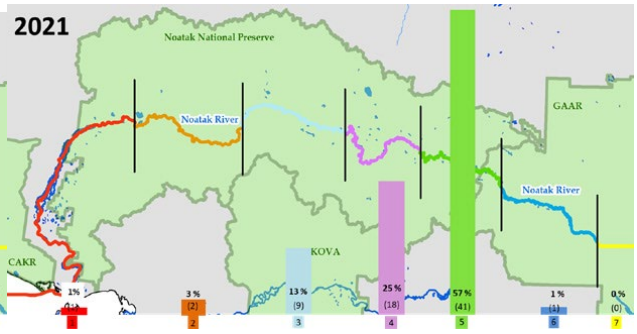


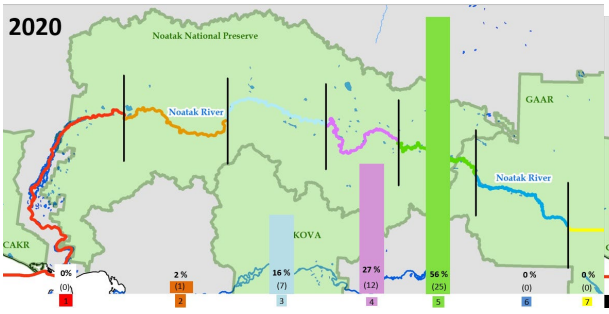
Map 3. Western Arctic Caribou Herd seasonal range map, 2002-2017 (image from WACHWG 2019a).

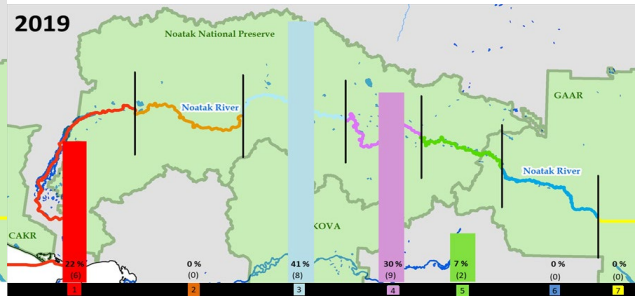

2024
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
1%
36%
(32)
27%
(24)
30%
(26)
3%
(3)
2%
(2)
0%
(0)

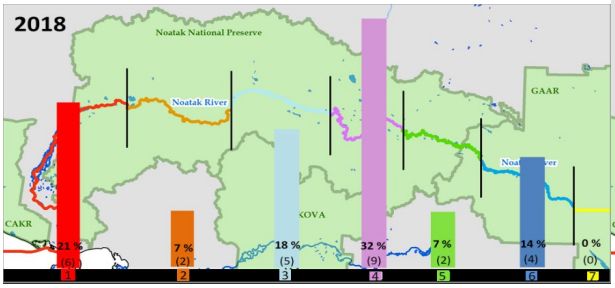

2023
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
1%
0%
(0)
8%
(7)
26%
(24)
65%
(60)
0%
(0)
0%
(0)

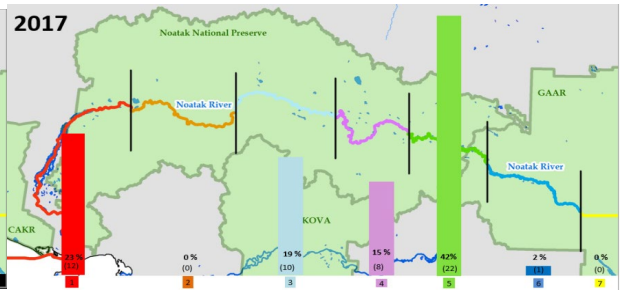

2022
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
0%
(0)
0%
(0)
8%
(2)
33%
(8)
58%
(14)
0%
(0)
0%
(0)

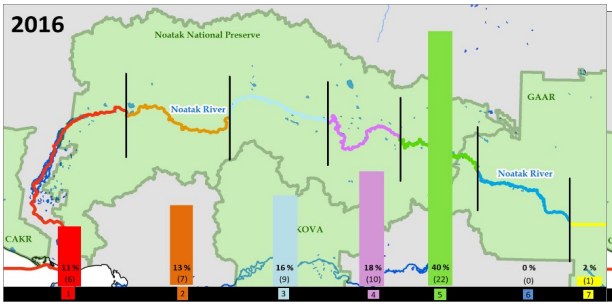

2021
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
1%
3%
(2)
13%
(9)
25%
(18)
57%
(41)
1%
(1)
0%
(0)

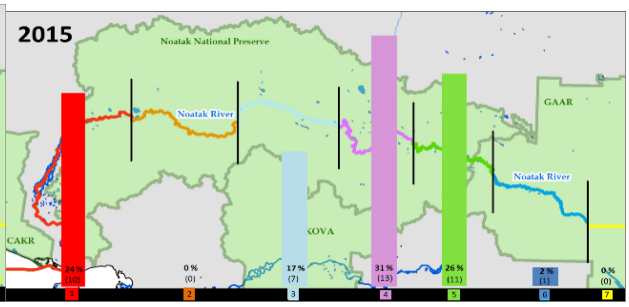

2020
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
0%
(0)
2%
(1)
16%
(7)
27%
(12)
56%
(25)
0%
(0)
0%
(0)


2019
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
22%
(6)
0%
(0)
41%
(8)
30%
(9)
7%
(2)
0%
(0)
0%
(0)


2018
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
21%
(6)
7%
(2)
18%
(5)
32%
(9)
7%
(2)
14%
(4)
0%
(0)


2017
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
0%
(0)
19%
(10)
15%
(8)
42%
(22)
2%
(1)
0%
(0)


2016
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
11%
(6)
13%
(7)
16%
(9)
18%
(10)
40%
(22)
0%
(0)
2%
(1)


2015
Noatak National Preserve
Noatak River
GAAR
KOVA
CAKR
Noatak River
24%
(10)
0%
(0)
17%
(7)
31%
(13)
26%
(11)
2%
(1)
0%
(0)

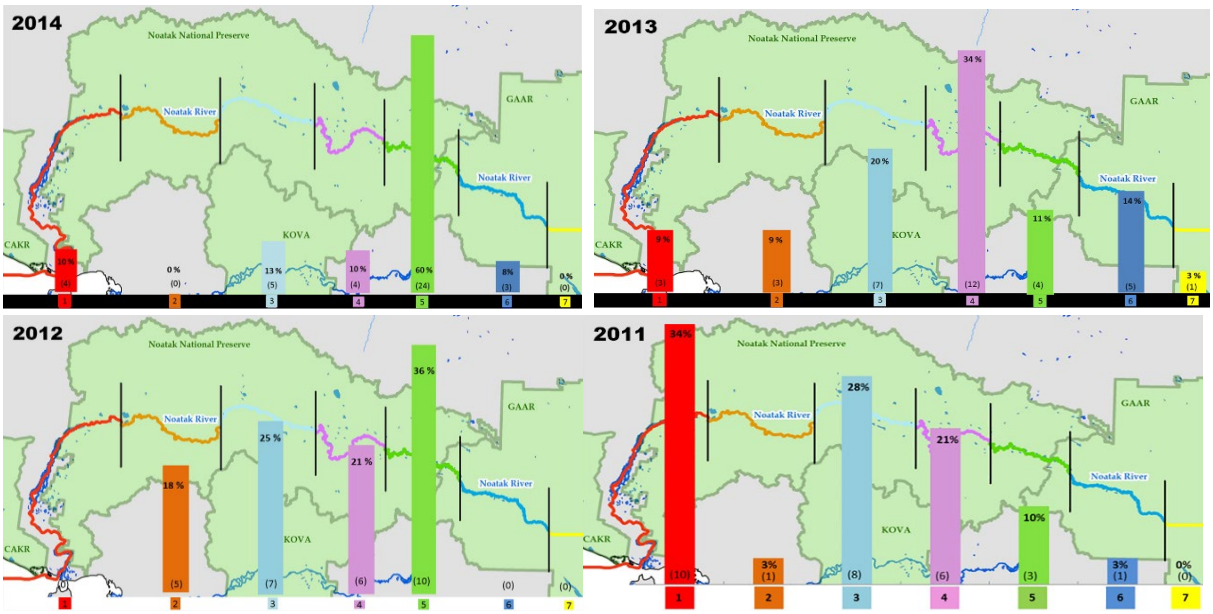


Figure 1. 2011-2024 distribution of caribou crossing the Noatak River during fall. Histograms depict where collared female caribou crossed the Noatak River, generally from north to south, on their fall migration. Relative percentages (top number) and the absolute number (middle number) of caribou are provided. The river is divided into seven (lowest number) color-coded segments which are displayed in the background. The middle five segments are 100 river kilometers long, while the westernmost segment (red) is 200 km (before extending into the Chukchi Sea) and the easternmost (yellow) runs as far east as WACH caribou are known to migrate (Joly and Cameron 2026).

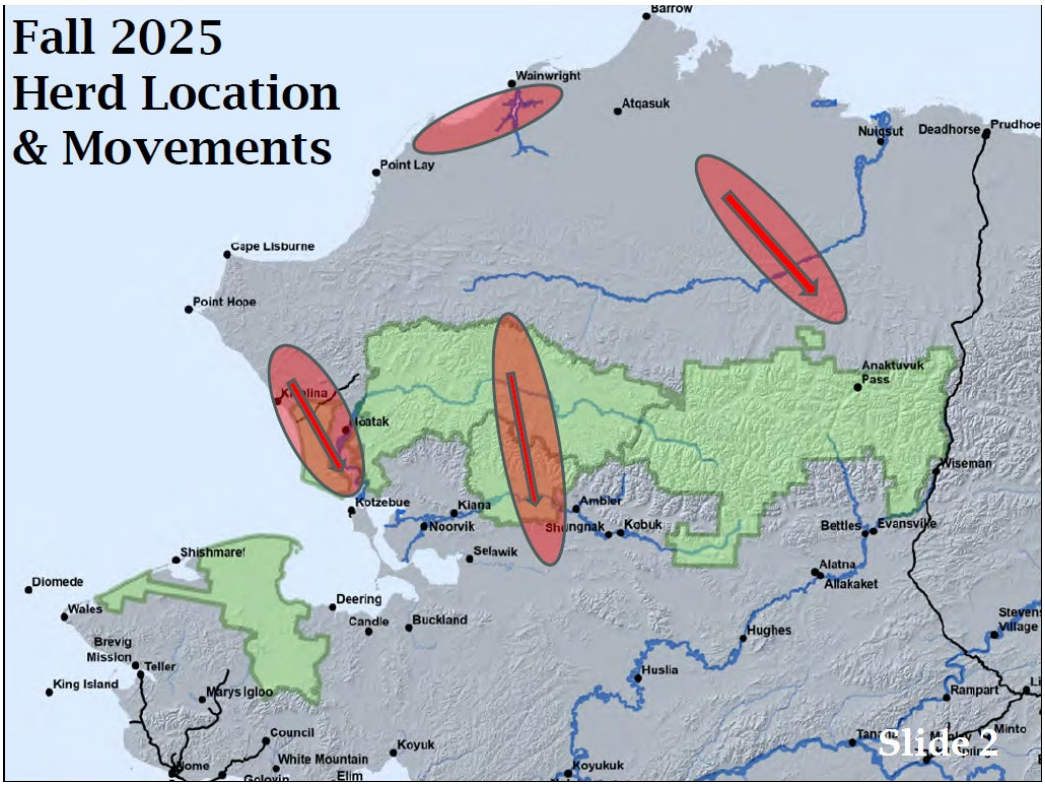


Figure 2. Fall 2025 locations and movements of the WACH, based on radio-collared cows as presented by NPS biologists for the WACH at the WACH Working Group's 2025 meeting (WACHWG 2025).

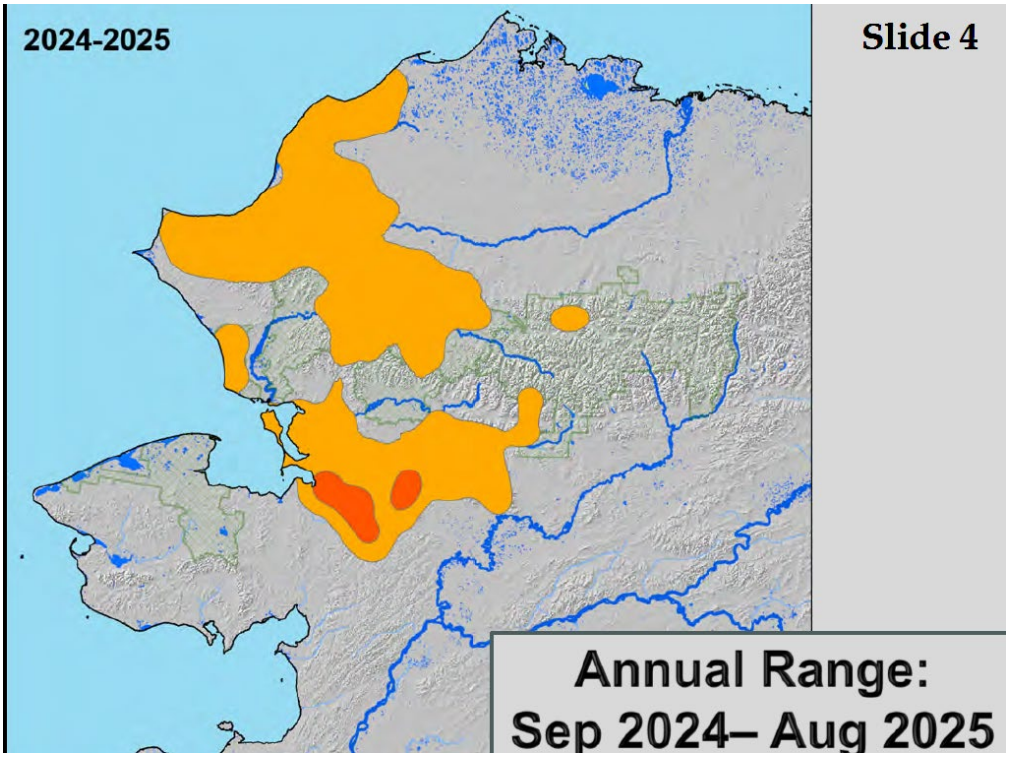


Figure 3. Annual range of the WACH from Sep. 2024 – Aug. 2025. This slide was presented by NPS biologists for the WACH at the WACH Working Group's 2025 meeting (WACHWG 2025).

Table 1. WACH management levels using herd size, population trend, and harvest rate (**WACHWG 2019b**).

Management and Harvest Level	Population Trend			Harvest Recommendations May Include:
	Declining Adult Cow Survival <80% Calf Recruitment <15:100	**Stable** Adult Cow Survival 80%-88% Calf Recruitment 15-22:100	**Increasing** Adult Cow Survival >88% Calf Recruitment >22:100	
Liberal	Pop: 265,000+ Harvest: 14,000+	Pop: 230,000+ Harvest: 14,000+	Pop: 200,000+ Harvest: 14,000+	• Reduce harvest of bulls by nonresidents to maintain at least 30 bulls:100 cows • No restriction of bull harvest by resident hunters unless bull:cow ratios fall below 30 bulls:100 cows
Conservative	Pop: 200,000-265,000 Harvest: 10,000-14,000	Pop: 170,000-230,000 Harvest: 10,000-14,000	Pop: 150,000-200,000 Harvest: 10,000-14,000	• Encourage voluntary reduction in calf harvest, especially when the population is declining • No cow harvest by nonresidents • Restriction of bull harvest by nonresidents • Limit the subsistence harvest of bulls only when necessary to maintain a minimum 30:100 bull:cow ratio
Preservative	Pop: 130,000-200,000 Harvest: 6,000-10,000	Pop: 115,000-170,000 Harvest: 6,000-10,000	Pop: 100,000-150,000 Harvest: 6,000-10,000	• No harvest of calves • Limit harvest of cows by resident hunters through permit hunts and/or village quotas • Limit the subsistence harvest of bulls to maintain at least 30 bulls:100 cows • Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary
Critical	Pop: <130,000 Harvest: <6,000	Pop: <115,000 Harvest: <6,000	Pop: <100,000 Harvest: <6,000	• No harvest of calves • Highly restrict the harvest of cows through permit hunts and/or village quotas • Limit the subsistence harvest of bulls to maintain at least 30 bulls:100 cows • Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary

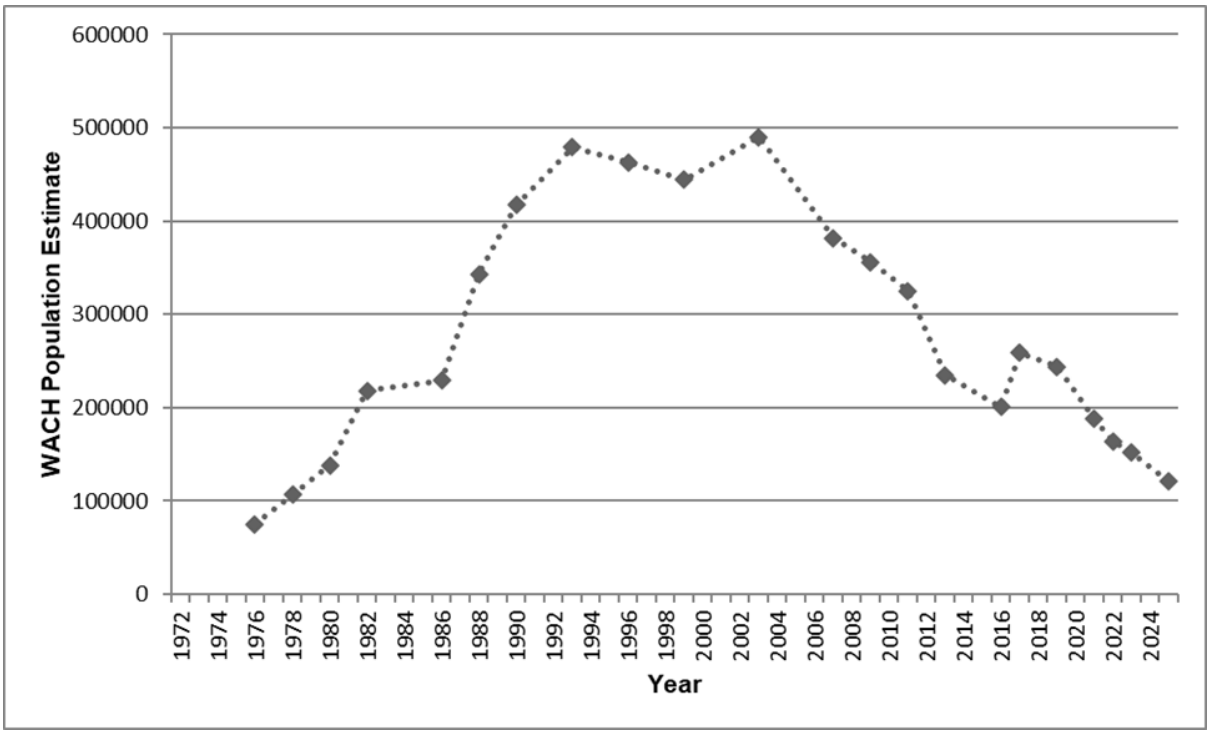


Figure 4. The WACH population estimates from 1970–2025. Population estimates from 1986–2025 are based on aerial photographs of groups of caribou that contained radio-collared animals (Dau 2011, 2013, 2014; Parrett 2016, 2017a; Hansen 2019a; WACHWG 2025).

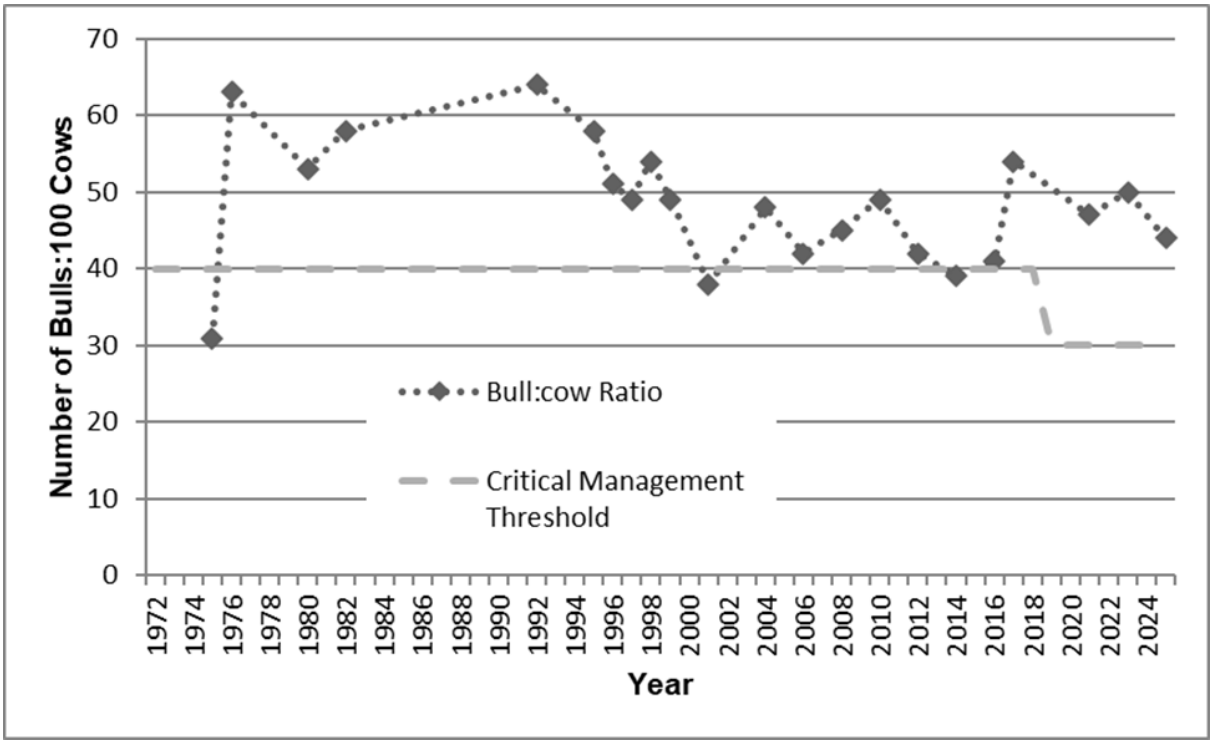


Figure 5. Bull:cow ratios for the WACH (Dau 2015; ADF&G 2017c; Parrett 2017a; WACHWG 2025).

Figure 6. Survival rate of radio-collared cow caribou in the WACH (Dau 2013, 2015, 2016b; NWARAC 2019; WACHWG 2025). Collar Year = 1 Oct–Sep 30. Note: Prior to 2019, collars were deployed via boat in Onion Portage from September to October. Starting in 2019 collars were deployed via net gun techniques in spring (Joly and Cameron 2021).

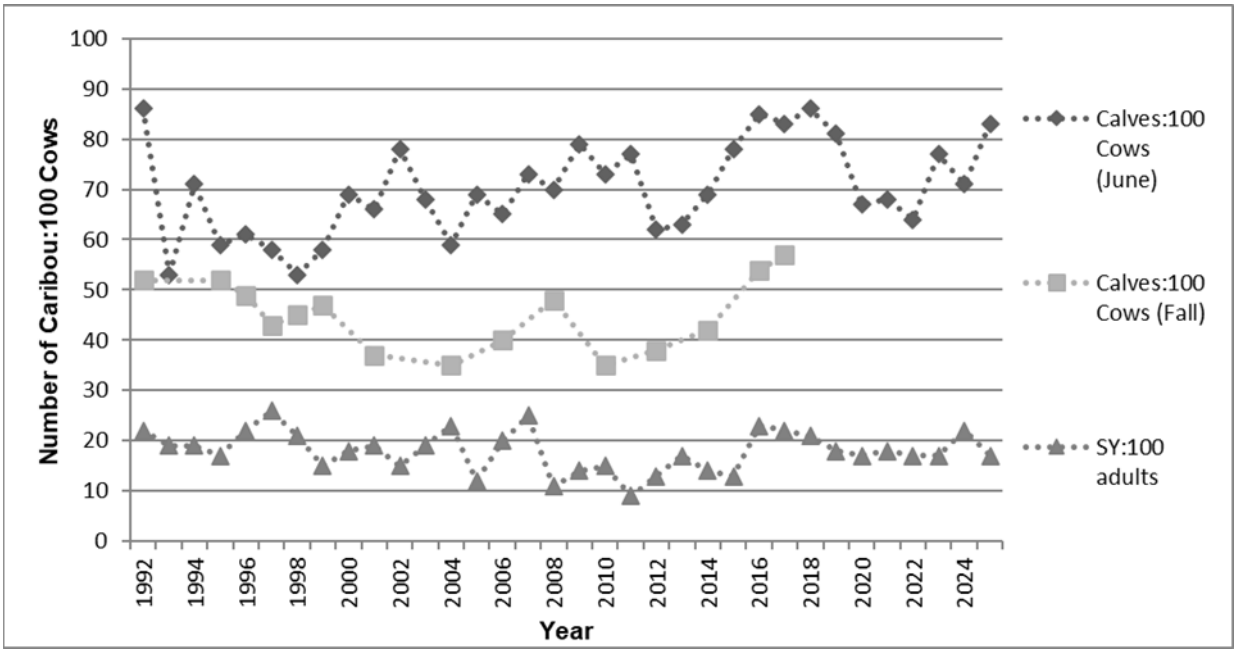


Figure 7. Calf:cow and short yearling (SY):adult ratios for the WACH (Dau 2013, 2015, 2016a; ADF&G 2017c; Parrett 2017a; NWARAC 2019, 2023; WACHWG 2025). Short yearlings are 10-11 months old caribou.

Teshekpuk Caribou Herd

The TCH calving and summering areas overlap with the eastern portion of the National Petroleum Reserve–Alaska (NPR–A). Most of the TCH moves toward Teshekpuk Lake in May to calve in early June. The primary calving grounds of the TCH (approximately 1.8 million acres) occur to the east, southeast and northeast of Teshekpuk Lake (**Figure 8**, Person et al. 2007; Wilson et al. 2012). From late June through July cows and bulls move to seek relief from insects (**Figure 8**, Carroll 2007; Parrett 2007). Fall and winter movements are more variable, although most of the TCH winters on the coastal plain (Carroll 2007). The TCH winters in four relatively distinct areas: the coastal plain between Atqasuk and Wainwright; the coastal plain west of Nuiqsut; the central Brooks Range; and the shared winter ranges with the WACH in the Noatak, Kobuk, and Selawik River drainages (**Figure 8**, Parrett 2021).

State management objectives for the TCH include (Parrett 2021):

- Maintain a population of at least 15,000 caribou, recognizing that caribou numbers naturally fluctuate.
- Provide a harvest of at least 900 caribou in a sustainable manner.
- Maintain a population with a range of 25–35 bulls:100 cows, depending upon population level.
- Obtain harvest estimates with sufficient data such that a 15% change in annual harvest is detectable.

Since 1984, the minimum population of the TCH has been estimated from aerial photocensuses and radio-telemetry data. Interpretation of population estimates is difficult due to movements and range overlap among caribou herds, which results in both temporary and permanent immigration and emigration (Person et al. 2007). For example, the minimum count in 2013 contained an unknown number of CACH caribou (Parrett 2015a). Following the 2013 census, ADF&G made the decision to manage the TCH based on the minimum count because the bulk of the animals that were estimated rather than counted were with the WACH at the time of the photocensus (Parrett 2015b, pers. comm.).

The TCH population has far exceeded the management objective of 15,000 caribou since 2008 (Parrett 2021). The TCH population increased from an estimated 18,292 caribou (minimum estimate 11,822) in 1984 to 68,932 caribou (minimum estimate 64,106) in 2008. From 2008 to 2014, the population declined by almost half to 39,000 caribou (Parrett 2015a). In 2017, the minimum count was 56,255 with a population estimate of 55,614 (SE = 2,909). The total minimum count for the 2022 photocensus was 51,225 caribou and the population estimate was 61,593 animals (95% CI: 52,188-70,998) (Daggett 2023, pers. comm.).

In 2013 and 2016, the bull:cow ratio was 39 bulls:100 cows and 28 bulls:100 cows, respectively (Parrett 2011, 2013, 2015a; Parrett 2017a, pers. comm.). Comparison of bull:cow and calf:cow ratios from 1991-2000 with later years is not possible due to changes in methodology. The calf:cow ratio increased from 18 calves:100 cows between 2009-2013 to 48 calves:100 cows in 2016 (Parrett 2013, 2015a; Parrett 2017a, pers. comm.). In addition, the number of SY:adults declined from an average of 20 SY:100 adults between 1999 and 2008 to an average of 14 SY:100 adults from 2009-2014 (Parrett 2013) and increased in 2016 to 29 SY:100 adults (Parrett 2017a, pers. comm.). From 2018-2021, the SY:adult ratio returned to

an average of 14 SY:100 adults. In the most recent survey in 2023, the ratio decreased to 6.8 SY:100 adults (Daggett 2023, pers. comm.).

The annual mortality of adult radio collared females from the TCH has remained close to the long term (1991-2012) average of 14.5% (range 8–25%) (Parrett 2011, 2015a; Caribou Trails 2014). In 2016, there was high adult female survival (92%), high yearling recruitment (29 yearlings:100 adults), high calf production (81%), and a high fall calf:cow ratio (48 calves:100 cows) (Parrett 2017a, pers. comm.; Klimstra 2017). Parturition rates from 2018-2022 peaked at 85% in 2020 and have since declined to 45% in 2022 (Daggett 2023, pers. comm.).

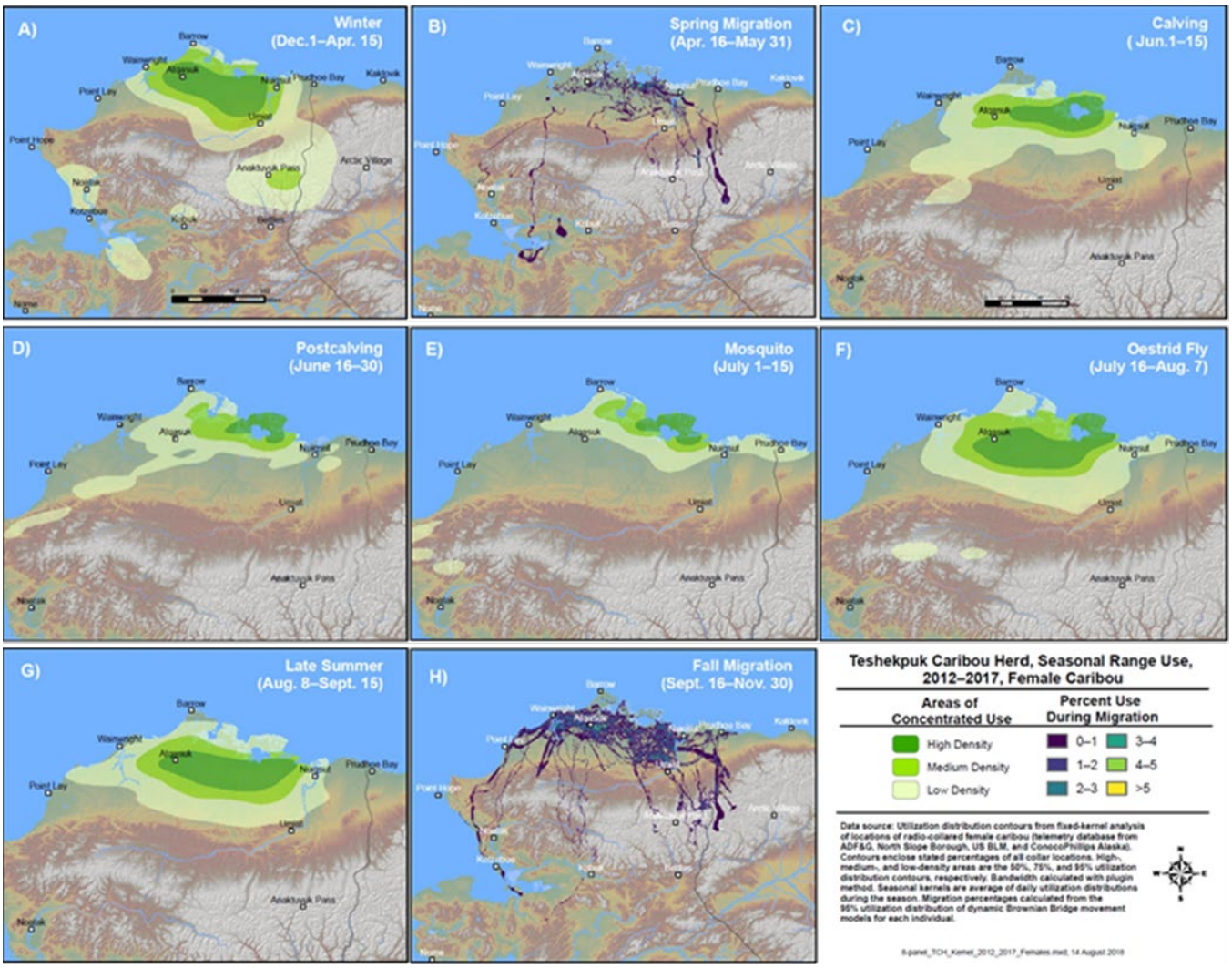


Figure 8. Seasonal ranges, 2012–2017, for satellite collared female caribou of the TCH Alaska (Parrett 2021). Note: Utqiaġvik was known as Barrow until 2016**.**

Cultural Knowledge and Traditional Practices

The potential effects of this request span the traditional territory the Iñupiat of the North Slope, Northwest Arctic and the Seward Peninsula, and Yup'ik communities in the southern portion of the Seward Peninsula. Additionally, Yup'ik communities in the northern portion of the Yukon region and some communities in the traditional territory of the Koyukon Athabascans have a customary and traditional use determination for caribou in portions of the proposal area (**Map 4**).

Because the communities that would be most directly affected by this proposal are located in traditional Iñupiaq territory, this section focuses on their cultural uses of caribou. Caribou have been a significant resource for the Iñupiat for thousands of years. Archaeological deposits at the Onion Portage site on the Kobuk River document 10,000 years of caribou hunting at this location, which is still used today, and even older archaeological deposits dated to approximately 11,000 years ago occur in the Kivalina River drainage (Anderson 1968, 1988; Buvit et al. 2019).

Iñupiat values are based on the perspective that the human-animal relationship is reciprocal. Maintaining this reciprocal relationship requires respectful human behavior toward animals that is guided by a system of rules. Three of the primary rules are 1) that humans must harvest animals who give themselves, 2) they must not waste any part of animals they harvest, and 3), in times of low animal populations, people must intentionally limit their harvest (Burch 1984, 1994, 1998; ADF&G 1992).

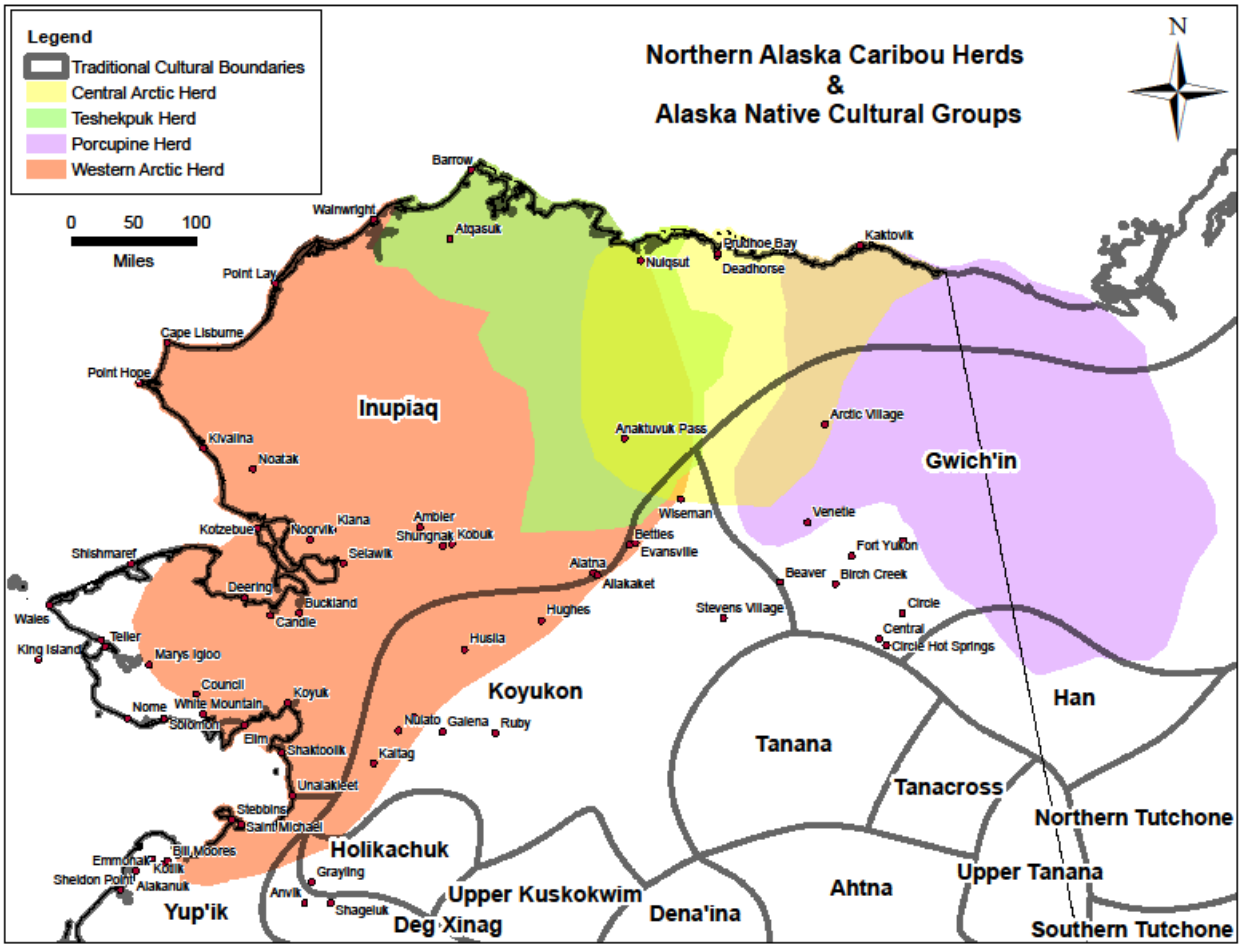
Failure to follow these rules or treating animals with disrespect will prevent animals from returning. Members of the Northwest Arctic Subsistence Regional Advisory Council (Northwest Arctic Council) have testified about the decline in local availability of caribou, which has meant that many people have gone without caribou in recent years (NWARAC 2023a). This proposal reflects the practice of intentional harvest limitation in order to maintain respectful and reciprocal relations between humans and caribou. At the Northwest Arctic Council meeting in October 2022, one Council member explained:

> Caribou is, I know they're going down. My son got caribou. I have caribou. So, he gave away to elders. And I always tell him don't get any more, I'll stop him when we have enough caribou because a family, my size, there's six of us in the family, and four caribou is enough for the whole year, and I always tell my son that's enough. When you get four caribou, that's good. The caribou herd is going down, we're not going to hunt this spring. And young men now, now days, if you teach them right, they'll listen, and I'm glad my son is doing that. Because I know the caribou is going down and we have to respect that (NWARAC 2022b: 20).

Variability in resource availability is a feature of subsistence economies. Prior to settlement in permanent communities, residents of Northwest Alaska were seasonally nomadic, and adapted to lack of local availability in resources by being mobile, as well as through extensive trading networks (Burch 1984). Communities depended on their Traditional Ecological Knowledge to remember how to draw on alternative resources and survive in difficult times (Minc 1986). For example, at meetings of the WACH Working Group, elders from Shungnak and Noorvik shared that their families harvested porcupine, ducks, geese, rabbits, fish, and ptarmigan during times

when caribou were scarce (WACHWG 2014, 2016). More severe shortages in caribou and other subsistence resources resulted in people leaving the area, such as outmigration from the Northwest Arctic region to the North Slope region in the 1880s (Burch 1984).

During sever restrictions on caribou harvest that began in 1976 due to a population crash at that time, residents of the community of Anaktuvuk Pass (which is outside of the area under consideration in this request) adapted to lack of caribou by increasing their participation in the labor market and relying on more store-bought food (Martin 2015). However, this particular adaptation was only made possible by a period of economic growth and development in the region.



Map 4. Map depicting the overlap of northern Alaska caribou herds and traditional territories of Alaska Native cultural groups.

Factors Affecting the WACH Population

The Northwest Arctic Council has identified multiple factors that may be negatively affecting the WACH population and local people's ability to harvest caribou. Most of these are beyond the control of local subsistence users, including climate change, delayed caribou migration, development, increased predation by bears and wolves and/or a combination of these factors (Braem et al. 2015; Dau 2015; NWARAC

2020, 2021a, 2021b, 2022a, 2022b, 2023a, 2023b, 2024a, 2024b, 2025). Reducing their harvest is one of the few actions Unit 23 communities can take to attempt to slow the WACH population decline.

This is the third time since 2022 that the Board has received a request to reduce the harvest limit for the WACH to four caribou per year, one of which may be a cow. During discussion of Proposal WP24-28/29, a previous proposal which requested the same caribou harvest limit as this Special Action Request, members of the Northwest Arctic Council discussed their rationale for supporting the reduced harvest limit. Council members emphasized the importance of acting pre-emptively and acknowledged that local residents would have to make sacrifices for the preservation of the herd, including taking fewer cows:

> We don't want to hit rock bottom with the caribou herd. If we lose that, if we go beyond what we have now we don't even know if we can get our caribou back (NWARAC 2023a: 59).
>
> We have to do something to try to preserve this herd even if it means a lot less than what we were getting before. [A] limit to hunting of the cows is the only way because they're the ones who…can bring this herd back. It's one of the things that we have to sacrifice (NWARAC 2023a: 54).

One Council member from Kotzebue discussed the need for action parallel to the regulatory process to educate the young people in Northwest Arctic communities about the importance of saving the caribou population. Another Council member from Kotzebue emphasized that restricting harvest by federally qualified subsistence users would demonstrate local will to self-limit harvest in order to protect the WACH (NWARAC 2023a).

Prior to Proposal WP24-28/29, Wildlife Special Action WSA22-05/06 made the same harvest limit request. During public hearings for WSA22-05/06, testifiers who rely on the WACH stated that they were aware that conservations measures were needed. However, they were concerned about drastic harvest limit reductions and asked for a decision-making process that is community-based and allowed adequate time for input and consultation with federally qualified subsistence users. At the Board meeting on WSA22-05/06, the Chair of the Northwest Arctic Council acknowledged that local reaction to the proposed harvest limit had been negative but emphasized that some conservation action would ultimately need to be taken by federally qualified subsistence users (NWARAC 2023a).

Factors Contributing Towards Increased Harvest Pressure on Cows

In the fall and prior to freeze-up, bulls have traditionally been preferred because they are fatter than cows (Georgette and Loon 1993; NWARAC 2023a). After freeze-up, cows are preferred, because bulls are typically skinnier and in rut by then; the meat smells bad and is of poor quality (Braem et al. 2015; NWARAC 2023a).

In some—but not all—survey years, ADF&G, Division of Subsistence data in the Community Subsistence Information System (CSIS) contains a breakdown of caribou harvest by male, female, or sex unknown. In Unit 23, in surveys conducted periodically between 1964 and 2021 for which this information exists, an average of 61% of the caribou harvest was male and 29% was female, with 10% being of unknown sex (**Appendix 2,** ADF&G 2023, 2026). In Wainwright, and Point Lay in surveys conducted in 2012 and 2023, an average of 64% of caribou harvested were male, 33% were female, and

3% were of unknown sex (**Appendix 2,** ADF&G 2023, 2026). In Unit 22 communities, in surveys conducted between 1998 and 2017, an average of 56% of the harvest was male and 30% was female, with 14% being of unknown sex (**Appendix 2,** ADF&G 2026,). However, there was wide variability between years and communities in the breakdown of the harvest by sex.

The WACH Working Group has identified limiting cow harvest as the highest priority for WACH conservation (WACH Working Group 2022, 2023, 2024, 2025). However, harvest of caribou by federally qualified subsistence users has likely shifted towards cows due to the delayed migration of caribou into Unit 23 community hunting areas, as described by Northwest Arctic Council members (NWARAC 2023a, 2025). With the delayed migration, caribou have been arriving in some Unit 23 communities after the rut season has begun, at which point bulls are considered inedible. The local preference is to avoid hunting bulls for many months after the rut.

As emphasized by the Seward Peninsula Council, the Kobuk Valley SRC, and an Elder testifying to the North Slope Council, restricting cow harvest levels through regulation is likely necessary but not sufficient for the conservation of the herd. There will be a need for continuous outreach and hunter education about why it is important to conserve cows, and how to distinguish between cows and bulls (SPRAC 2025, NSRAC 2026, NWARAC 2026).

Unequal distribution of harvest effort

This proposal seeks a reduced individual harvest limit for the WACH, and past subsistence harvest estimates can inform consideration of reduced limits. ADF&G, Division of Subsistence has conducted periodic subsistence surveys for communities within the proposal area between 1986 and 2023. These data have limitations, such as the fact that some communities are surveyed only once every ten years, not every survey year is representative of typical subsistence use, and even in representative years, harvest numbers are estimates only. Nonetheless, subsistence surveys do provide valuable information on historical baseline harvest levels.

While wildlife regulations administer harvest limits on an individual basis, not all members of a community harvest and distribute wild foods at equal levels. Generally, many more people use caribou than harvest caribou because of the Iñupiaq cultural value of harvesting and sharing subsistence foods to provide for those who do not have a hunter in the household. As first posited by Wolfe (1987) and supported by decades of ADF&G Division of Subsistence research, it is common for 30% of the households in rural Alaskan communities to harvest 70% of a community's total annual harvest measured in edible pounds of food (Magdanz et al. 2005, Wolfe et al. 2010).

Limiting caribou harvest to four per year, only one of which may be a cow, per individual hunter, is likely to adversely impact many communities' overall harvest due to the unequal distribution of harvest effort, and importance of sharing networks (Frankson 2025). At their March 2023 meeting, the Northwest Arctic Council discussed hunters that provide for a large number of families, and who would need designated hunter permits under a reduced harvest limit scenario:

> We kind of named them as super hunters because a lot of families will – five families will pull together gas and grub and whatever necessary for three boats to go out and hunt for

> six or seven families; that's why we call them super hunters, because they're providing for a lot of people that can't, you know, can't afford the gas, can't afford the boats, or don't have a boat, or an elder, that's one of the reasons why we kind of labeled them as super hunters but we need to ensure that they have this paperwork provided to them if they are going to do that" (NWARAC 2023a:110).

In household subsistence surveys, caribou harvest is often presented per person or per household, distributed across the entire community, which is useful when comparing different communities' reliance on caribou. However, this value can obscure information about the average number of caribou harvested by the households that actually harvested caribou. **Tables 2-4** present both metrics for communities within the proposal area. The latter value offers greater insight into how proposed regulations might affect individual caribou hunters across the range of the herd.

Note the difference between the two measures of caribou harvest (distributed across all households vs. only those households harvesting caribou). In Unit 23 communities, these numbers are 4.5 and 8.1 caribou, respectively (**Table 2**), and for Point Lay and Wainwright combined, they are 5.5 and 8.7, respectively (**Table 3**). In Unit 22, the average caribou harvest per community household is 1.2, but the harvest per successfully harvesting household is 4.6 (**Table 4**).

Because data on the number of caribou hunted per individual are not available from subsistence surveys, this analysis focuses on harvest per household. The higher the average number of caribou harvested per successfully harvesting household, the greater the potential impact of this request. In considering how historical harvest per successfully harvesting household compares to the proposed reduction to four caribou per year per permit holder, it is worth noting that some households that harvest for the wider community are likely to have multiple hunters, each of whom could hold a permit (Wolfe 1987). However, the average number of individual permit-holders per household in any given community is unknown.

Communities that may be disproportionately affected by the proposal, based on historical subsistence survey data, include Buckland and Deering, as well as Ambler, Shungnak, Selawik, and Wainwright (**Tables 2-4**). These communities would need the greatest number of hunters per harvesting household to maintain historic household harvest levels, if the reduced individual harvest limit is adopted. However, it should be noted that the survey data are not current, and total caribou harvest, as well as harvest per household harvesting, may have already declined to some extent due to lack of caribou availability in some years.

In addition to surveys conducted by ADF&G Division of Subsistence, The North Slope Borough has also documented caribou harvest in communities in its jurisdiction during certain study years. For surveys conducted between 2014 and 2018, Wainwright (along with Anaktuvuk Pass) was noted as having the highest caribou harvest per household in the region, with Point Hope having some of the lowest household harvests of caribou (Person et al. 2019).

Caribou harvest is affected by multiple factors: availability of animals, shifting migration routes, weather, sharing networks, human population size, community location, regulations, fuel costs, the availability of

other resources, and other socio-economic factors. The numbers in the tables cited in this section are approximations and do not tell the entire story of caribou harvest or need in these communities.

At recent meetings of the Northwest Arctic Council, members have provided updates on their ability to harvest caribou in 2024 and 2025. In the fall and winter of 2024—2025, Council members within Unit 23 reported that caribou arrived very late, but once they were present in the region, community members were moderately successful with harvesting them. In some cases, cows were targeted because of their late arrival (NWARAC 2025).

Multiple considerations and pressures determine how many caribou are harvested when a successful hunt is made. For example, in Unit 23, residents of some communities have had to "greatly increase their expenditure of money and effort to maintain…harvest levels" (Dau 2015:14-30). This is due in part to having to travel farther, more frequently, and for longer durations to find caribou, which is made even more expensive by rising fuel prices (Halas 2015; Gonzalez et al. 2018). A reduced harvest limit may make such large investments untenable for some hunters, who would otherwise have provided for the wider community.

Designated hunter permits could lessen these impacts, as they allow a federally qualified subsistence user to harvest for other federally qualified subsistence users. For caribou, the designated hunter may hunt for any number of federally qualified subsistence users but can have no more than two harvest limits in possession at any time. These permits currently present bureaucratic and logistical challenges to rural residents. Both the hunter and the recipient must have a hunting license, permit to hunt caribou, and the hunter must have the additional designated hunter permit. Applying for multiple permits may run counter to traditional norms that dictate one should not talk about or advertise hunting plans (Kawerak 2013, Laugrand and Oosten 2015). Designated hunter permits also only apply to Federal public lands, so hunters would need to distinguish land status. However, if a reduced harvest limit is implemented, this would also currently apply only on Federal lands.

Table 2. For communities in Unit 23, this table shows the estimated average number of caribou harvested (1) per household, and (2) per household successfully harvesting caribou for surveys conducted periodically by ADF&G Division of Subsistence between 1986 and 2021. Calculated based on data from the Community Subsistence Information System (CSIS) (ADF&G 2023, 2026) and ADF&G, Division of Subsistence Technical Papers (Mikow et al. 2014., Mikow and Kostick 2016). Survey years with key data missing were excluded.

Community	Estimated Number of Caribou per Household	Estimated Number of Caribou per Households that Successfully Harvested Caribou
Ambler	5.3	10.5
Buckland	7.4	11.2
Deering	5.6	11.0
Kiana	3.8	6.3
Kivalina	2.9	5.5
Kobuk	4.8	7.2
Kotzebue	2.1	5.7
Noatak	3.8	6.7

Community	Estimated Number of Caribou per Household	Estimated Number of Caribou per Households that Successfully Harvested Caribou
Noorvik	4.0	6.8
Point Hope	1.1	3.6
Selawik	5.9	10.0
Shungnak	7.6	12.2
Average	**4.5**	**8.1**

Table 3. For communities in the portion of the proposal area within Unit 26A, this table shows the estimated average number of caribou harvested (1) per household, and (2) per household successfully harvesting caribou for surveys conducted periodically by ADF&G Division of Subsistence between 1987 and 2023. Calculated based on data from the Community Subsistence Information System (CSIS) (ADF&G 2023, 2026). Survey years with key data missing were excluded.

Community	Estimated Number of Caribou per Household	Number of Caribou per Households that Successfully Harvested Caribou
Point Lay	4.7	7.2
Wainwright	6.2	10.1
Average	**5.5**	**8.7**

Table 4. For communities in Unit 22, this table shows the average estimated number of caribou harvested (1) per household, and (2) per household successfully harvesting caribou for surveys conducted periodically by ADF&G Division of Subsistence between 1989 and 2018. Calculated based on data from the Community Subsistence Information System (CSIS) (ADF&G 2023). Survey years with key data missing were excluded. Note that this table does not include survey data for Nome, which are not available.

Community	Estimated Number of Caribou per Household	Estimated Number of Caribou per Households that Successfully Harvested Caribou
Brevig Mission	0.8	5.1
Elim	2.0	4.0
Golovin	<0.1	1.0
Koyuk	3.6	6.1
Saint Michael	0.3	3.5
Shaktoolik	2.7	5.2
Shishmaref	3.0	6.7
Stebbins	0.1	6.3
Teller	0.2	2.9
Unalakleet	2.3	6.3
Wales	<0.1	3.4

Community	Estimated Number of Caribou per Household	Estimated Number of Caribou per Households that Successfully Harvested Caribou
White Mountain	1.2	4.5
Average	**1.2**	**4.6**

Harvest History

Western Arctic Caribou Herd harvest

The WACH Working Group provides recommendations on herd management, including harvest levels. Currently, the WACH is within the "critical declining" level, which prescribes a harvest of less than 6,000 caribou when the population is < 130,000 caribou, equating to a 4.6% harvest rate (**Table 1**). As the 2025 population estimate was 121,000 caribou, the harvestable surplus is currently 5,566 caribou (4.6% of 121,000) (NWARAC 2023; WACHWG 2025). At the critical declining level, the plan also recommends eliminating calf harvest, highly restricting cow harvest, limiting bull harvest to maintain adequate bull:cow ratios, and closures to non-federally qualified users (**Table 1**).

Of particular concern is the overharvest of cows, which may have occurred since 2010/11 (Dau 2015). Dau (2015:14-29) states, "even modest increases in the cow harvest above sustainable levels could have a significant effect on the population trajectory of the WACH." During the 2023 WACH Working Group meeting, an ADF&G biologist suggested the harvestable surplus of cows is close to zero, and presented modeled estimates for the 2024 WACH population with and without cow harvest (140,000 vs. 146,000). He stressed the need to conserve cows because they are the reproductive potential of the herd (WACHWG 2023). He reiterated this message during the 2025 WACH working group meeting, stating eliminating cow harvest is one of the only steps we can take to help the WACH recover (**Figure 9**, WACHWG 2025). During the winter 2026 Seward Peninsula and Northwest Arctic Council meetings, ADF&G biologists estimated approximately 4,000 cows are harvested annually from the WACH (NWARAC 2026; SPRAC 2026). This far exceeds the harvestable surplus of zero cows and even approaches the harvestable surplus of the entire herd.

Caribou harvest by local hunters is estimated from community harvest surveys (**Appendix 2**), if available, and from models developed by A. Craig with ADF&G's Division of Wildlife Conservation Region V. These models incorporate factors such as community size, availability of caribou, and per capita harvests for each community, which are based on mean values from multiple community harvest surveys (Dau 2015). While these models accurately reflect harvest trends, they do not accurately reflect actual harvest numbers (Dau 2015). Caribou harvest by nonlocal residents and nonresidents are based on harvest reports from harvest tickets and registration permits (Dau 2015). Hunters considered local by ADF&G are functionally identical to federally qualified subsistence users (e.g. residents of St. Lawrence Island are technically federally qualified subsistence users, but do not frequently harvest Western Arctic caribou). From 1999–2018, the range-wide average estimated total harvest from the WACH was 14,103 caribou/year, ranging from 11,729-16,219 caribou/year (Hansen 2020 and 2021a, pers. comm.), but has generally been estimated at 12,000 +/- 1,750 caribou per year since 1996 (WACHWG 2025, 2021,

2019b). Additionally, harvest estimates do not include wounding loss, which may be hundreds of caribou (Dau 2015). Year-specific harvest estimates have not been generated since 2018, in part because they are not very accurate (Hansen 2021a, pers. comm., WACHWG 2021). While all of these harvest estimates are above the critical harvest level specified in the WACH Management Plan and indicate unsustainable harvest levels, actual harvest is unknown and could be much lower due to caribou being unavailable for harvest near local communities.

Local hunters account for approximately 95% of the total WACH harvest and residents of Unit 23 account for approximately 58% of the total harvest on average (ADF&G 2017c). Comparison of caribou harvest by community from household survey data (**Appendix 2**) with **Figure 1** demonstrates that local community harvests parallel WACH availability rather than population trends. For example, Ambler only harvested 325 caribou when the WACH population peaked in 2003 but harvested 685 caribou in 2012 when most of the WACH migrated through eastern Unit 23. Similarly, Noatak only harvested 66 caribou in 2010 when no GPS-collared caribou migrated through western Unit 23. Harvest increased substantially (360 caribou) the following year when 37% of the GPS-collared caribou (and thus, a greater proportion of the WACH) migrated through western Unit 23 (**Appendix 2**).

Between 1998 and 2020, annual reported caribou harvest in Unit 23 ranged from 168-814 caribou (Hansen 2021a, pers. comm.). Over the same time period, reported harvest by non-federally qualified users ranged from 131-657 caribou. The lowest reported harvest occurred in 2016 when all Federal public lands in Unit 23 were closed to non-federally qualified users, but before harvest reporting was required for federally qualified subsistence users. Regardless, local compliance with reporting mandates is considered low but increasing. In 2017 and 2018, registration permits became required under State and Federal regulations, respectively, which is reflected in the greater number of reported caribou harvest by federally qualified subsistence users. However, compliance with reporting caribou harvest still remains too low to accurately estimate total caribou harvest as only 10% of total harvest is conservatively estimated to be reported through the RC907 permits (ADF&G 2024; WACHWG 2025). On average, 76% of WACH caribou harvested by nonlocals are harvested in Unit 23 (Dau 2015). Between 2016, when Federal lands closures began, and 2020, reported caribou harvest by non-local hunters in Unit 23 averaged 254 caribou (WinfoNet 2018, 2019, Hansen 2021a pers. comm.).

Reported caribou harvest by local residents, non-local residents, and non-residents in Unit 23 since 2020 is currently unavailable. Resident harvest occurs under the State's RC907 permit; however, in response to a request for these data, ADF&G stated that defensible year-specific harvest estimates have not been generated due to limited reporting. For non-residents, harvest was by harvest ticket until 2025 and is now by drawing permit in Unit 23. Although non-resident harvest information is generally considered reliable, these data were not received.

In 2016, the RC800 permit was established in Unit 22. From 2016-2023, total reported harvest by all user groups in Units 22B and 22D ranged from 51-316 caribou per year and averaged 122 caribou per year. During this period, reported harvest by residents in Units 22B and 22D ranged from 45–288 caribou per year and averaged 103 caribou per year, while reported harvest by non-local residents and nonresidents

averaged 19 caribou per year (OSM 2026). Reported harvest by all user groups in Unit 22 since 2023 and for the other Unit 22 subunits since 2016 is unavailable. The Unit 22 RC800 permit hunt is estimated by ADF&G (2024) to have low reporting participation, and in response to a request for these data, ADF&G stated that defensible year-specific harvest estimates have not been generated. Non-resident harvest data requests were likewise not completed.

Similarly, recent reported caribou harvest information in Unit 26A SW is not available. While total WACH harvest remains uncertain due to varying reporting participation, reporting by non-local residents and nonresidents (NFQUs) is generally considered reliable. However, due to lack of available information, OSM could not evaluate recent NFQU harvests or assess potential biological impacts on the WACH.

From 1999-2013, 72% of nonlocal hunters on average accessed the WACH by plane. Most nonlocal harvest (85-90%) occurs between August 25 and October 7. Most local subsistence hunters harvest WACH caribou whenever they are available using boats, 4-wheelers, and snowmachines (Dau 2015, Fix and Ackerman 2015). In Unit 23, caribou have historically been available during fall migration, but this has no longer been the case in recent years; caribou migration has occurred later, resulting in subsistence harvest also occurring later, which in turn contributes to food insecurity.

Figure 9. Slide presented by the ADF&G biologist for the Western Arctic Caribou Herd at the WACH Working Group's 2025 meeting (WACHWG 2025).

Unit 26A and Teshekpuk Caribou Herd harvest

Reliance on caribou from a particular herd within Unit 26A varies by community. Residents of Atqasuk, Utqiaġvik, and Nuiqsut harvest caribou primarily from the TCH while residents from Anaktuvuk Pass, Point Lay, Point Hope and Wainwright harvest caribou primarily from the WACH (Person 2023). Weather, distance of caribou from the community, terrain, and high fuel costs are some of the factors that can affect the availability and accessibility of caribou. Residents of Nuiqsut, which is on the northeast corner of Unit 26A, harvest approximately 11% of their caribou from the CACH (Table 7, Parrett 2013).

Range overlap between the three caribou herds, frequent changes in the wintering distribution of the TCH and WACH, and annual variation in the community harvest survey effort and location make it difficult to determine the proportion of the TCH, WACH, and CACH in the harvest. Knowledge of caribou

distribution at the time of the reported harvest is sometimes used to estimate the proportion of the harvest from each herd. A general overview of the relative utilization based on estimated harvest of each caribou herd by community for regulatory year 2010/11, is presented in **Table 5** (Parrett 2011, Dau 2011, and. Lenart 2011). The percentage of caribou harvested from different herds by community has varied ≤ 2% for all communities between 2008/09, 2009/10, and 2010/11.

Harvest from the TCH is difficult to estimate because of very poor reporting, variation in community survey effort and location, widely varying wintering distribution of the TCH, and mixing of caribou herds. Most of the harvest occurs from July-October by local hunters in Unit 26A. Very low levels of TCH harvest occur in Units 23, 24, and 26B. Non-locals and non-residents account for less than 3% of the TCH harvest (Parrett 2013). Parrett (2013) estimated 3,387 TCH caribou were harvested in Unit 26A by local communities in each of 2010/11 and 2011/12 regulatory years and that previously reported harvest estimates (Parrett 2009) were biased high due to oversampling (**Table 5**). This estimated harvest is well above State objectives.

Table 5. Estimated caribou harvest of the Teshekpuk, Western Arctic and Central Arctic caribou herds during the 2010/2011 regulatory years in Unit 26A by federally qualified users (Parrett 2013, Dau 2013). Note: Due to the mixing or the herds, annual variation in the community harvest surveys and missing data, the percentages for each community do not add up to 100%.

Community	Human population[a]	Per capita caribou harvest[bc]	Approximate total community harvest	Estimated annual TCH harvest (%)	Estimated annual WACH harvest (%)	Estimated annual CACH harvest (%)
Anaktuvuk Pass	331	1.8	582	174 (30)	431 (80)	
Atqasuk	234	0.9	215	210 (98)	6 (2)	
Barrow	4,290	0.5	2,145	2,123 (97)	62 (3)	
Nuiqsut	411	1.1	468	403 (86)	3 (1)	36 (11)
Point Lay	191	1.3	247	49 (20)	120 (40)	
Point Hope	704		894	0	894 (100)	
Wainwright	559	1.3	710	426 (60)	48 (15)	
Total Harvest				3,387	1564	36

[a] Population estimates averaged from the 2010 U.S. Census and 2012 Alaska Department of Commerce, Division of Community and Regional Affairs data

[b] Citations associated with per-capita caribou harvest assessment by community can be found in Table 5 (Parrett 2011).

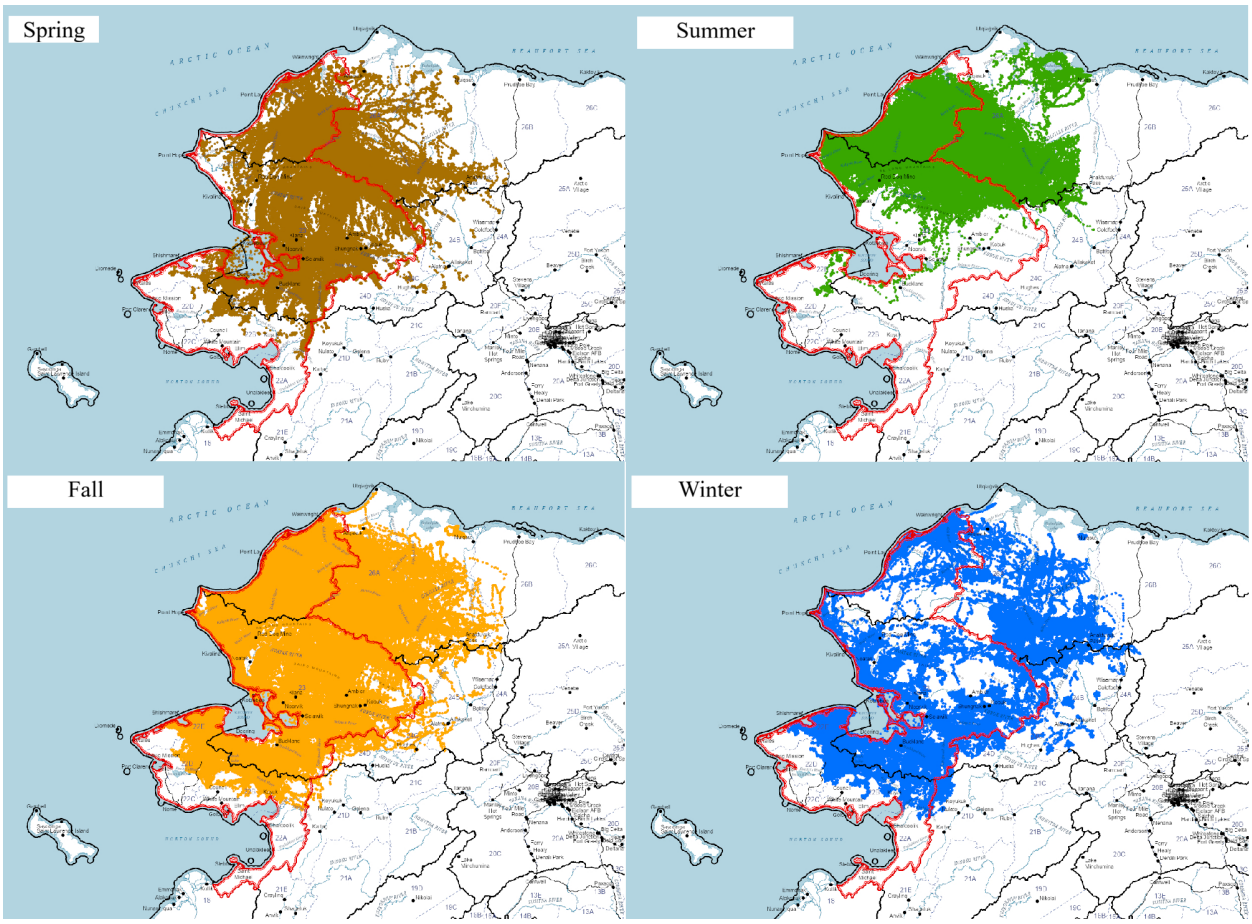
[c] Sutherland (2005)

Alternatives Considered

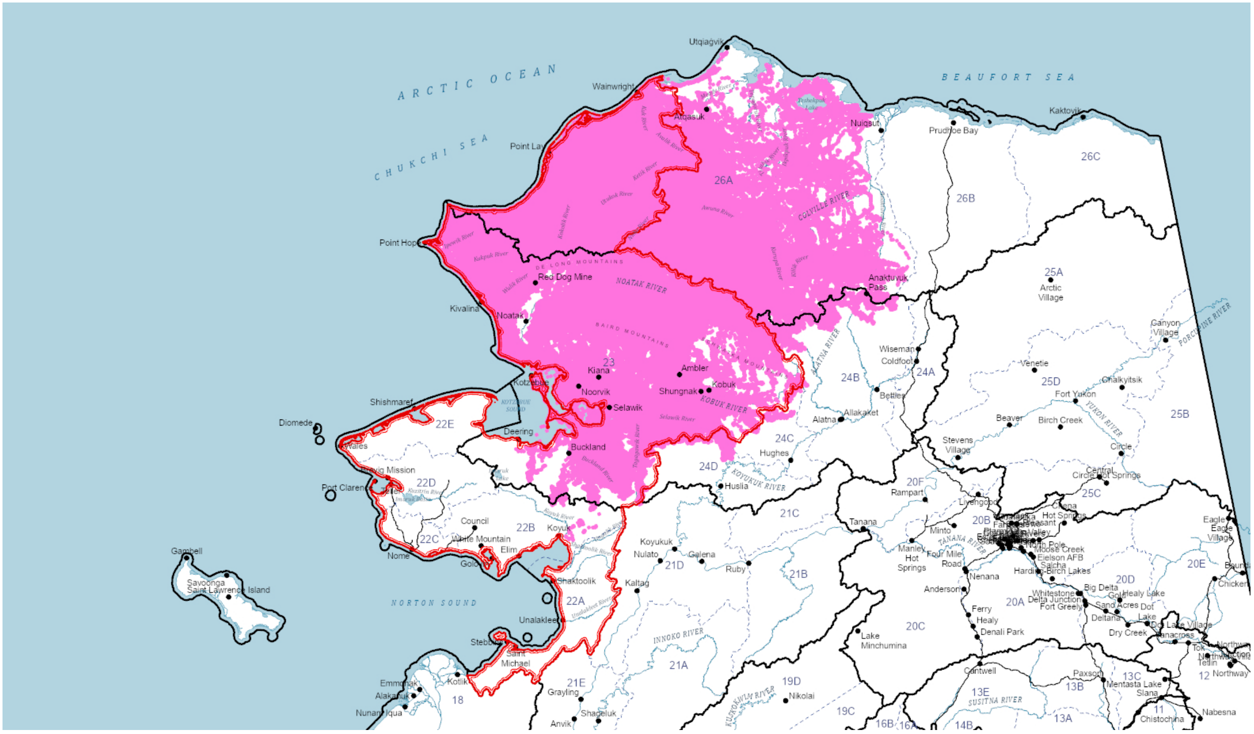
Eliminating cow harvest: One alternative considered was to eliminate cow harvest as supported by the Northwest Arctic and Seward Peninsula Councils and the KOVA, CAKR, and GAAR SRCs. Cow survival is the primary factor contributing to the WACH's decline (see Biological Background section), and eliminating human harvest of cows is the single most controllable factor in enhancing herd recovery and preventing further population decline. According to household harvest surveys, about 30% of subsistence harvest has historically been cows (see Cultural Knowledge and Traditional Practices section). State and Federal biologists have repeatedly stressed the importance of protecting cows due to their impact on population trajectory, including models of population estimates with and without cow harvest (**Figure 9,** WACH 2024, 2025; NWARAC 2025). Bull:cow ratios have consistently been above the critical management threshold, indicating there are surplus bulls available for harvest and a sufficient number of bulls for breeding. However, bulls are unpalatable during rut, and due to changes in migration timing, cows may be subsistence users' only option for harvest when caribou are accessible in their area. As the Northwest Arctic and Seward Peninsula Councils supported this alternative, it represents Council deference.

Reduce Harvest Limit to 10: Another alternative considered was to reduce the harvest limit to ten caribou per year instead of four caribou per year. According to household harvest surveys, those households that harvest caribou harvest an average of about 8.1 caribou/year in the Northwest Arctic region, 8.7 caribou/year in Point Lay and Wainwright, and 4.6 caribou/year in the Seward Peninsula region (see Cultural Knowledge and Traditional Practices section). Reducing the harvest limit to ten caribou/year, instead of four caribou/year could contribute to food security as it would allow theses households to continue harvesting at their traditional levels, particularly in the Northwest Arctic and western North Slope. However, this alternative may not meaningfully contribute to WACH conservation and recovery. The use of designated hunter permits would also serve to mitigate these impacts and better denote the use of sharing.

Differential Harvest Limit Reductions: Another alternative considered was to differentially reduce harvest limits across hunt areas. The North Slope Council recommended reducing the harvest limit for the hunt areas affected in their region (Unit 26A SW and Unit 23 Singoalik) to ten caribou/year, only one of which may be a cow, while reducing the harvest limit in Unit 22 and Unit 23 remainder to four caribou/year, only one of which may be cow as proposed in this request. The TCH, which is well above management objectives, also occupies Unit 26A (**Figure 8**). Much of the caribou harvest in Unit 26A is likely from the TCH rather than the WACH. However, it is impossible to differentiate between TCH and WACH caribou on the ground. Given the critical declining status of the WACH, its high, year-round occupancy of Unit 26A SW and Unit 23 Singoalik (**Maps 5, 6**), and severe need to limit harvest for its continued conservation, this alternative was not considered further.



Map 5. Recorded locations of all radio-collared WACH cows by season, 2009 - 2026 (Spring: Apr. 1-May 31, Summer: Jun. 1- Aug. 31, Fall: Sep. 1- Nov. 30, and Winter: Dec. 1- Mar. 31) (Joly 2026, pers. comm.).



Map 6. Recent recorded locations of all radio-collared WACH cows, 2020-2026 (Joly 2026, pers. comm.).

Establish Community Harvest System: Another alternative considered was to establish a community harvest system. Given the rapid decline of the WACH and the cultural practice of hunting for others, this may be the best way to administer caribou hunting permits. Each community would be given a shared pool of permits, to be distributed by the Tribal government. The State of Alaska took a similar approach in the 1970s. This would support those hunters who take caribou for the wider community and would likely also assist in tracking harvest. However, setting up this system in communities across the range of the WACH would be logistically challenging, and is beyond the scope of this proposal.

Closure to non-federally qualified users: In Unit 23, Federal public lands are closed to non-federally qualified users from *Aug. 1-Oct. 31 unless the WACH exceeds 200,000 caribou.* Currently, the WACH is far below this population threshold. One alternative considered was to extend the closure in Unit 23 to year-round. This current closure completely overlaps with the nonresident season and few nonlocal residents hunt outside of the fall closure dates. However, local subsistence users, who comprise the majority of the WACH harvest would also be able to harvest on Federal public lands under the more liberal State regulations outside of the Federal closure period, negating some of the conservation impact of this request. As caribou are migrating later and more often encountered during the rut in Unit 23, more local subsistence harvests have occurred later in the year, after the Federal fall closure period. However, OSM did not consider this alternative because it was not part of the proponent's request. Upon reaching out to the proponent for further clarification, the proponent indicated they supported broad restrictions to harvest. This special action request was made using the proponents' understanding of the regulatory frameworks available to them. Furthermore, the proponent expressed their support for WSA26-02 and WSA26-03.

Please see WSA26-02 and WSA26-03 analyses for consideration of closures to non-federally qualified users in Units 22 and 26A SW, respectively.

Harvest limit restrictions to non-federally qualified users: This request only applies to federally qualified subsistence users harvesting caribou under Federal regulations. Anyone harvesting on Federal public lands (except National Parks and Federal lands in Unit 23 from Aug. 1-Oct. 31) could still harvest 15 caribou/year, one of which may be a cow under the more liberal State regulations, negating the intended conservation impacts of this request. Reducing the harvest limit of NFQUs to match any harvest restrictions to FQSUs enacted through this request would further the conservation impacts on the WACH. It would also prevent Federal regulations from being more restrictive than State regulations on Federal public lands, which was a concern expressed by some Regional Advisory Councils and during the public hearing. However, OSM did not consider this alternative because it was not part of the proponent's request. Upon reaching out to the proponent for further clarification, the proponent indicated they supported broad restrictions to harvest. This special action request was made using the proponents understanding of the regulatory frameworks available to them.

Extension to the 2027/28 regulatory year: This request is only for the 2026/27 regulatory year. Another special action request would need to be submitted and approved to restrict Federal harvest for the 2027/28 regulatory year as a regulatory proposal could not be adopted until April 2028, effective July 1, 2028. As the WACH population is very unlikely to recover in the next 1-2 years, extending any harvest limit restrictions approved through this request to the entire 2026-2028 regulatory cycle is prudent. If further restrictions are necessary after the 2025 photocensus results are available, another special action request could be submitted for the 2027/28 regulatory year and would supersede this request. WSA26-02 and WSA26-03 request changes for the entire 2026-2028 regulatory cycle, so extending this request to apply to the entire cycle would also coincide with any changes approved via those related requests. This alternative should be further considered.

Discussion and Effects

If WSA26-01 is adopted, the Federal caribou harvest limit in Units 22, 23, and 26A SW, would be reduced from fifteen caribou per year, only one of which may be a cow to four caribou per year, only one of which may be a cow for the 2026/27 regulatory year (**Map 1**). The decreased harvest limits would reduce subsistence hunting opportunity and harvest under Federal regulations, but could help conserve the WACH and aid in its recovery, which, in turn, could provide more subsistence hunting opportunity in the future. Additionally, intentional harvest reduction to conserve the resource aligns with local cultural practices and values.

All Alaska residents could still harvest 15 caribou/year under State regulations on Federal public lands in Units 22 and 26A, which could greatly limit the impacts of adopting this request on both the WACH and subsistence users. Federal regulations would also become more restrictive than State regulations. Because Unit 23 Federal lands are closed to caribou hunting by NFQUs from Aug. 1-Oct. 31, State regulations would not apply on Federal public lands in Unit 23 during this time, strengthening the conservation effects of these proposed harvest limit reductions within Unit 23. National parks and monuments, including those within Unit 23, are always subject only to Federal subsistence regulations; State regulations do not apply. Additionally, a year-round closure applies to the Noatak corridor in Unit 23, and

State regulations would not apply to this area above the mean high-water mark. However, all users could still harvest caribou on the remaining Federal public lands in Unit 23 from Nov. 1-July 31 under the more liberal State regulations.

However, if both WSA26-02 and WSA26-03 are approved, closing Federal lands in Units 22 and 26A SW, respectively, then this conservation measure requested in WSA26-01 would be more effective as subsistence users could only harvest 4 caribou/year on Federal public lands under Federal regulations. If Federal public lands remain open under the more liberal State regulations, subsistence users (who account for the majority of the WACH cow and total harvest) could still harvest 15 caribou and 1 cow, negating any conservation impact of this request in Units 22 and 26A SW. Another difference between State and Federal regulations in Units 22 and 26A SW is that calves may be harvested under State regulations, while calf harvest is prohibited under Federal regulations.

In recent years, no collared WACH caribou have migrated into Unit 22 (**Map 6**). Therefore, any regulation changes in this unit are unlikely to affect WACH harvest. However, caribou movements and distributions are highly variable, and portions of the WACH may return there in the future (**Map 5**; Joly et al. 2021). A resident caribou herd or remnants of the WACH are also present in Unit 22 (SPRAC 2021, 2022, 2026, WACH 2025), and harvest limit reductions under Federal regulations would curtail harvest from these small caribou populations, although users would still be able to harvest fifteen caribou under State regulations (unless WSA26-02 is also approved).

In contrast, collared WACH have continually been recorded year-round in Unit 26A SW (**Maps 5, 6**), highlighting the importance of protecting caribou cows and reducing harvest in this hunt area. If WSA26-01 is approved, all users could still harvest on Federal public lands under the more liberal State regulations, negating any conservation impact of this request in this critical area (unless matching State regulations are adopted or WSA26-03 is also approved).

Limiting caribou harvest to four per year, only one of which may be a cow, per individual hunter, is likely to have a significant adverse impact on many communities' overall harvest due to the unequal distribution of harvest effort and the importance of sharing networks. While four caribou per year per hunter may be enough for individuals and some families (NWARAC 2022b), many families and elders depend on others to hunt enough caribou to provide for the wider community. Designated hunter permits could mitigate these effects and is intended to accommodate the cultural practice of harvesting for others. Designated hunter permits allow federally qualified subsistence users to hunt for others and allow designated hunters to possess two harvest limits at one time. However, it may take time for hunters to embrace the use of these permits, which can be logistically burdensome. Additionally, these permits only apply to Federal public lands, so users would need to distinguish land status and limit hunting by designated hunter permit to Federal lands only.

OSM CONCLUSION

Support Wildlife Special Action WSA26-01 **with modification** to also eliminate the cow hunt and apply these harvest limit restrictions to the entire 2026-2028 wildlife regulatory cycle.

The draft regulations read:

Note: These regulations would apply to the 2026/27 and 2027/28 regulatory years (unless superseded by subsequent special action).

Unit 22—Caribou

*Unit 22B, that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River, and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage—**4 bulls** ~~15 caribou, only 1 may be a cow~~ by State registration permit. Calves may not be taken.*	*Oct. 1-Apr. 30.* *May 1-Sep. 30, a season may be announced.*
*Units 22A, that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek drainage—**4 bulls** ~~15 caribou, only 1 may be a cow~~ by State registration permit. Calves may not be taken.*	*July 1–June 30.*
*Unit 22A, remainder—**4 bulls** ~~15 caribou, only 1 may be a cow~~ by State registration permit. Calves may not be taken.*	*July 1-June 30, season may be announced.*
*Unit 22D, that portion in the Pilgrim River drainage—**4 bulls** ~~15 caribou, only 1 may be a cow~~ by State registration permit. Calves may not be taken.*	*Oct. 1-Apr. 30.* *May 1-Sep. 30, season may be announced*
*Units 22C, 22D remainder, 22E remainder—**4 bulls** ~~15 caribou, only 1 may be a cow~~ by State registration permit. Calves may not be taken.*	*July 1-June 30, season may be announced*

Unit 23−Caribou

*Unit 23, that portion which includes all drainages north and west of, and including, the Singoalik River drainage—**4 bulls** ~~15 caribou, only 1 may be a cow~~, by State registration permit as follows:*	
~~*Bulls may be harvested.*~~	*July 1–June 30*
~~*Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.*~~	~~*July 15–Apr. 30*~~

Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.

*Unit 23, remainder—**4 bulls** ~~15 caribou, only 1 may be a cow~~, by State registration permit, as follows:*

~~*Bulls may be harvested*~~	*July 1–June 30*
~~*Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.*~~	~~*July 31–Mar. 31*~~

Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Unit 26—Caribou

*Unit 26A—west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages—**4 bulls** ~~15 caribou, only 1 may be a cow~~, by State registration permit as follows:*

Calves may not be taken.

~~*Bulls may be harvested.*~~	*July 1-Oct. 14.* *Dec. 6-June 30.*
~~*Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15.*~~	~~*July 16-Mar. 15.*~~

Justification

OSM supports measures to reduce conservation concerns for the WACH. The lengthy and precipitous decline of the WACH warrants strong measures to aid in the recovery and conservation of this population. Current harvest rates, especially the taking of cows, could prolong or worsen the current decline, and hamper recovery efforts. Additionally, while causes of the decline are multi-faceted and uncertain, reducing human harvest is the most controllable factor.

Specifically, eliminating cow harvest and conserving as many cows as possible in the population is the most beneficial and controllable thing we can do (**Figure 9**). While OSM recognizes that eliminating cow harvest may significantly decrease food security for local users, protecting cows now will help ensure more caribou are available in the future. In addition to harvest restrictions in regulation, there will be a need for continuous outreach and hunter education about why it is important to conserve cows, and how to distinguish between cows and bulls.

Additionally, OSM recognizes that users could still harvest one cow under State regulations on Federal public lands in Unit 22, Unit 26A SW, and from Nov. 1 – Jul. 31 in Unit 23, reducing the conservation effects. However, if WSA26-02 and WSA26-03 are approved, then all caribou harvest on Federal public lands in Units 22 and 26A SW under the more liberal State regulations would be prohibited. OSM also notes the Northwest Arctic, Western Interior and Seward Peninsula Councils also support eliminating cow harvest.

Bull:cow ratios are adequate and have consistently been above the WACH Working Group's management threshold of 30 bulls:100 cows, indicating there are a sufficient number of bulls for effective breeding as well as surplus bulls for harvest. Reducing the harvest limit from 15 bulls to 4 bulls will not have as much of a positive impact on herd conservation as eliminating cow harvest, while the ability to harvest 15 caribou/year may be more beneficial to food security and meeting subsistence users' needs, especially for hunters who provide for the wider community. However, the WACH population is so low, that restricting total harvest is prudent. Additionally, this restriction was supported by the Seward Peninsula and Northwest Arctic Councils. The use of designated hunter permits can mitigate the impacts of this restriction on sharing networks. All users would still be able to harvest 15 caribou/year on most Federal public lands under the more liberal State regulations, limiting conservation effectiveness (unless WSA26-02 and -03 are also approved).

Extending this harvest limit restriction to the entire 2026-2028 regulatory cycle helps ensure conservation measures for the WACH continue under Federal regulations. The WACH population is unlikely to recover in 1-2 years, and a regulatory proposal to enact conservation measures in codified Federal regulation cannot be adopted until 2028. If further conservation measures are necessary before then, another special action could be submitted that would supersede any action on this request.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Western Interior Alaska Subsistence Regional Advisory Council

The Council **took no action** on WSA26-01. As written, the Council believes this request does not adequately protect the interest of subsistence users, since if this was to pass, there would be disparities between state and federal regulations, making federally qualified subsistence users' harvest limits significantly lower than the state bag limit, and because not all of the Western Arctic caribou herd's (WACH) range is included in this request. Additionally, the Council feels that the harvest of cows should be eliminated when the population is this low.

The Council voted to submit a wildlife special action request to the Board to mirror any emergency order the State might issue to restrict WACH harvest.

Seward Peninsula Subsistence Regional Advisory Council

The Council voted to **support** WSA26-01 **with modification** to also eliminate cow harvest (see draft regulations under OSM conclusion).

The Council stresses that the WACH population is in dire condition, and eliminating cow harvest will help ensure the herd's future viability. The Council received a concerning report indicating that 4,000 cows are estimated to be taken by hunters each year, while the herd's current status does not support any harvestable surplus of females. Conserving cows is vital to the future of the herd. The Council further emphasized the need to reduce other causes of mortality, such as predation, but concluded that human harvest is the only factor users can control to reduce cow mortality, and therefore, prohibiting cow harvest is a necessary measure. The Council believes that the change in regulation will be an adjustment that ultimately benefits federally qualified subsistence users in the long-term and that four bulls should still provide sufficient subsistence opportunities.

Northwest Arctic Subsistence Regional Advisory Council

The Council voted to **support** WSA26-01 **with modification** to also eliminate the harvest of cows (see draft regulations under OSM conclusion).

The Council believes that this request is in the best interest of the Western Arctic Caribou Herd (WACH) and will help conserve the herd for future generations as cows are vital to the ability of the WACH to rebuild. The continued population decline of the WACH highlights the urgent need to implement sustainable practices so that the population may begin to recover. It is essential to protect our subsistence lifestyle and maintain the ability to pass on traditions and cultural knowledge to younger generations, ensuring the continuity of our way of life. The current situation demands that we do everything possible to conserve the WACH and safeguard subsistence uses into the future. The Council noted that while these measures may be challenging in the short term, they will benefit everyone in the long term and are not

intended to be a permanent change; if we work together and act responsibly, the restrictions can be lifted once the herd rebounds. History shows that recovery is possible—the caribou population rebounded from 75,000 in the 1970s—and with collective action, it can happen again. Given the current rate of decline, the Council noted that there is a real fear that only a few years of hunting remain if the current level of take continues, which threatens our identity as caribou people. Ultimately, while these changes may be difficult now, they are a necessary investment for the long-term benefit and well-being of future generations.

Of note, the Council also voted to submit correspondence to the Alaska Department of Fish and Game to request the closure of the take of cows under state regulations for the 2026/27 season in Units 22, 23, and 26A SW.

North Slope Subsistence Regional Advisory Council

The Council **supported** WSA26-01 **with modification** to reduce the caribou harvest limit in Unit 26A SW and Unit 23, north and west of and including the Singoalik River drainage to 10 caribou per year (and retain the 4 caribou harvest limit reduction in the remaining hunt areas).

The Council also voted to submit a special action request to close caribou hunting to NFQU's in Unit 26A SW (WSA26-03).

The draft regulations read:

Unit 23−Caribou

*Unit 23, that portion which includes all drainages north and west of, and including, the Singoalik River drainage—**10** ~~15~~ caribou, only 1 may be a cow, by State registration permit as follows:*	
Bulls may be harvested.	*July 1–June 30*
Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.	*July 15–Apr. 30*
Federal public lands are closed to caribou hunting Aug. 1-Oct. 31, except by federally qualified subsistence users hunting under these regulations unless the Western Arctic Caribou herd population estimate exceeds 200,000 caribou.	

Unit 26—Caribou

*Unit 26A—west of the Colville River drainage upstream from the Nuka River and drainages of the Chukchi Sea, south and west of and including the Kuk and Kugrua River drainages—**10** ~~15~~ caribou, only 1 may be a cow, by State registration permit as follows:*

Calves may not be taken.	
Bulls may be harvested.	*July 1-Oct. 14.*
	Dec. 6-June 30.
Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15.	*July 16-Mar. 15.*

The Council stated that imposing a caribou harvest limit of four caribou per year per hunter would greatly impact subsistence users of the communities of Wainwright, Point Lay and Point Hope and that a higher limit is necessary to ensure their continuation of subsistence uses of caribou. Additionally, the Council stated that the Western Arctic Caribou Herd (WACH) does not generally occur in southwestern Unit 26A or northwestern Unit 23 during the primary times of cow harvest as the entirety of the herd occurs further south. This modification demonstrates the Council's willingness to address the conservation concerns of the WACH while ensuring the subsistence needs of those three communities are met despite the impacts this harvest limit reduction presents to the subsistence users of the region.

The Council concluded that, when management actions are needed to ensure the viability of the WACH population, subsistence harvest limits should only be reduced after caribou harvest by non-federally qualified users is addressed. To that end, the Council submitted WSA26-03, requesting closure of Federal public lands in Unit 26A SW to caribou hunting by non-federally qualified users for the 2026-2028 regulatory cycle.

Appendix 1

Regulatory History

In 2013, an aerial photo census indicated significant declines in the TCH (Caribou Trails 2014), WACH (Dau 2011), and possibly the Central Arctic Caribou Herd (CACH) populations. In response, the Alaska Board of Game (BOG) adopted modified Proposal 202 (RC76) in March 2015 to reduce harvest opportunities for both residents and nonresidents within the range of the WACH and the TCH. These regulation changes – which included lowering bag limits, changing harvest seasons, modifying the hunt area descriptors, and restricting bull and cow harvest and prohibiting calf harvest – were adopted to slow or reverse the population decline. These regulatory changes took effect on July 1, 2015.

Four Special Actions, WSA15-03/04/05/06, submitted by the North Slope Council requested changes to caribou regulations in Units 23, 24, and 26. Temporary Special Action WSA15-03, requested designation of a new hunt area for caribou in Unit 23 where the harvest limit would be reduced from 15 caribou per day to 5 caribou per day, the harvest season be reduced for bulls and cows, and the take of calves would be prohibited. Temporary Special Action WSA15-04 requested designation of a new hunt area for caribou in Unit 24, the harvest seasons be reduced for bulls and cows, and the take of calves be prohibited.

Temporary Special Action WSA15-05 requested that bull caribou harvest limit in Unit 26A be reduced from 10 caribou per day to 5 caribou per day, the cow harvest limit be reduced to 3 per day, the harvest seasons for bulls and cows be reduced, and the take of calves and cows with calves be prohibited. Compared to the new State caribou regulations, it requested 3 additional weeks to the bull harvest season (Dec. 6- Dec. 31). Temporary Special Action WSA15-06 requested designation of a new hunt area for caribou in Unit 26B where the harvest limit would be reduced from 10 caribou per day to 5 caribou per day, the harvest season would be shortened, and the take of calves would be prohibited.

The Federal Subsistence Board (Board) approved Temporary Special Actions WSA15-03/04/05/06 with modification to simplify and clarify the regulatory language; maintain the current hunt areas in Units 23 and 24; decrease the harvest limit from 15 to 5 caribou per day and shorten the cow and bull seasons throughout Unit 23; prohibit the harvest of cows with calves throughout the affected units; and reduce the harvest limit in Unit 26B remainder from 10 to 5 caribou per day and shorten the season. These special actions took effect on July 1, 2015.

In 2015, the Northwest Arctic Council submitted a temporary special action request (WSA16-01) to close caribou hunting on Federal public lands in Unit 23 to non-federally qualified users for the 2016/17 regulatory year. The Northwest Arctic Council stated that their request was necessary for conservation purposes but also needed because nonlocal hunting activities were negatively affecting subsistence harvests. In April 2016, the Board approved WSA16-01, basing its decision on the strong support of the Northwest Arctic and North Slope Councils, public testimony in favor of the request, as well as concerns over conservation and continuation of subsistence uses.

In 2016, the Board considered six proposals (WP16-37, WP16-48, WP16-49/52, WP16-61, and WP16-63) concerning WACH caribou regulations. The Board adopted WP16-48 with modification to allow the positioning of a caribou, wolf, or wolverine for harvest in Unit 23 on BLM lands only. Proposal WP16-37

requested that Federal caribou regulations mirror the new State regulations across the ranges of the WACH and TCH (Units 21D, 22, 23, 24, 26A, and 26B). The Board adopted Proposal WP16-37 with modification to reduce the harvest limit to five caribou per day, restrict bull harvest during rut and cow harvest around calving, prohibit the harvest of calves and the harvest of cows with calves before weaning (mid-October), and to create a new hunt area in the northwest corner of Unit 23. The Board took no action on the remaining proposals (WP16-49/52, and WP16-61, and WP16-63) due to action taken on WP16-37.

In 2016, the BOG adopted Proposal 140 as amended to make the following changes to Unit 22 caribou regulations: establish a registration permit hunt (RC800), set an annual harvest limit of 20 caribou total, and lengthen cow and bull seasons in several hunt areas.

These State and Federal regulatory changes were the first time that harvest restrictions had been implemented for the WACH and TCH in over 30 years and were the result of extensive discussion and compromise among a variety of stakeholders. The requested restrictions were also supported by management recommendations outlined in the Western Arctic Herd Management Plan (WACHWG 2011).

In June 2016, the State submitted a special action request (WSA16-03) to reopen caribou hunting on Federal public lands in Unit 23 to non-federally qualified users, providing new biological information (e.g. calf recruitment, weight, body condition) on the WACH. The State specified that there was no biological reason for the closure and that it could increase user conflicts. In January 2017, the Board rejected WSA16-03 due to the position of all four affected Councils (Northwest Arctic, North Slope, Seward Peninsula, and Western Interior) as well as public testimony and Tribal consultation comments opposing the request. Additionally, the Board found the new information provided by the State to be insufficient to rescind the closure.

In January 2017, the BOG adopted Proposal 2, requiring registration permits for residents hunting caribou within the range of the Western Arctic and Teshekpuk herds in Units 21, 23, 24, and 26 (a similar proposal was passed for Unit 22 in 2016). ADF&G submitted the proposal in order to better monitor harvest and improve management flexibility. The BOG also rejected Proposal 3 (deferred Proposal 85 from 2016), which would have removed the caribou harvest ticket and report exception for residents living north of the Yukon River in Units 23 and 26A). Also in January 2017, the BOG rejected Proposal 45, which proposed requiring big game hunting camps to be spaced at least three miles apart along the Noatak, Agashashok, Eli, and Squirrel Rivers. The proposal failed as it would be difficult to enforce.

In March 2017, the Northwest Arctic and North Slope Councils submitted temporary special action requests (WSA17-03 and -04, respectively) to close caribou hunting on Federal public lands in Unit 23 and in Units 26A and 26B, respectively, to non-federally qualified users for the 2017/18 regulatory year. Both Councils stated that the intent of the proposed closures was to ensure subsistence use in the 2017/18 regulatory year, to protect declining caribou populations, and to reduce user conflicts. The Board voted to approve WSA17-03 with modification to close all Federal public lands within a 10 mile wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage, to caribou hunting

except by federally qualified subsistence users for the 2017/18 regulatory year. The Board considered the modification a reasonable compromise for all users, and that closure of the specified area was warranted in order to continue subsistence use. The Board rejected WSA17-04 due to recent changes to State regulations that should reduce caribou harvest.

In April 2018, the Board adopted Proposals WP18-46 with modification and WP18-48 (effective July 1, 2018). Proposal WP18-46 requested closing caribou hunting on Federal public lands in Unit 23 to non-federally qualified users (similar to WSA16-01 and WSA17-03). The Board adopted WP18-46 with the same modification as WSA17-03 (see above) as the Northwest Arctic, Western Interior, and Seward Peninsula Councils as well as the village of Noatak supported this modification and viewed the targeted closure as effectively addressing user conflicts and the continuation of subsistence uses. The Board also adopted WP18-48 to require State registration permits for caribou hunting in Units 22, 23, and 26A to improve harvest reporting and herd management, and to align with State regulations.

Also in 2018, the Board considered proposal WP18-57, which requested that caribou hunting on Federal public lands in Units 26A and 26B be closed to non-federally qualified users. This proposal was submitted by the North Slope Council to ensure continuation of subsistence, protect the caribou herds, and reduce user conflicts. The Board rejected WP18-57, choosing to allow time to evaluate the effects of recently implemented harvest restrictions. In addition, the Board expressed concern that closing Federal lands would shift users to State lands, increasing conflict.

In January 2020, the BOG adopted Proposal 20 to open a year-round resident season for caribou bull harvest in Unit 23 under State regulations. The BOG also adopted Proposal 24 as amended to remove the restriction on caribou calf harvest in Units 22, 23, and 26A. Proposal 28, which would have eliminated the caribou registration permit in Units 23 and 26A for North Slope resident hunters, was not adopted by the BOG, due to an ongoing need for harvest data.

In April 2020, the Board adopted Proposal WP20-46 to open a year-round bull season and permit calf harvest for caribou in Unit 23. Creating a year-round season for bulls was intended to allow for harvest of bulls when caribou migration had been delayed, alleviating harvest pressure on cows. The prohibition on calf harvest was lifted in order to permit taking of calves that had been orphaned or injured.

In 2021, the Northwest Arctic Council submitted Temporary Wildlife Special Action WSA21-01, which requested closing Federal public lands in Units 23 and 26A to caribou and moose hunting by non-federally qualified users from Aug. 1 - Sep. 30, 2021. The Council expressed concern about the late migration of caribou into and through Unit 23 and stated that the lack of fall harvest has resulted in empty freezers and stressed communities. The Council hoped a closure would reduce the impacts from transporters and non-local hunters on migrating caribou. In June 2021, the Board deferred action on this request and asked that Office of Subsistence Management (OSM) staff seek additional input on concerns related to caribou from the WACH Working Group, Federal land-managing agencies, local Fish and Game Advisory Committees, the ADF&G, Federal Subsistence Regional Advisory Councils, commercial guides and transporters, and subsistence users in the area.

In March 2022, the Board approved WSA21-01a (for caribou; WSA21-01b applied to moose) with modification to close Noatak National Preserve (including the Nigu River portion of the Preserve in Unit

26A) and BLM managed lands between the Noatak and Kobuk rivers in Unit 23 to caribou hunting by non-federally qualified users from August 1 through September 30 during the 2022-2023 and 2023-2024 regulatory years. The Board stated this modification was a reasonable compromise that provides for the continuation of subsistence uses and the conservation of the Western Arctic Caribou Herd, while precluding unnecessary restrictions on non-federally qualified users. The partial closure targets the areas of highest user conflicts and minimizes potential disruptions to caribou migration. The Board also expressed concern over the 24% WACH population decline over the past two years, which prompted the WACH Working Group to change the herd's management level to preservative declining.

In April 2022, the Board rejected Proposal WP22-47, which requested that caribou calf harvest be permitted in Unit 22. Four members of the Board felt this would supply new opportunity for federally qualified subsistence users and would align Federal and State regulations. The remaining four Board members opposed the proposal and felt with the herd in decline, it would be unwise to allow the harvest of caribou calves and was against the WACH management plan recommendations.

In June 2023, the Board voted to reject Wildlife Special Action requests WSA22-05 and WSA22-06, which requested to reduce the caribou harvest limit to 4 per year, only one may be a cow for the 2023/24 regulatory year in Unit 23 and across the range of the WACH, respectively. The Board stated that an immediate reduction to four caribou per year would be detrimental to subsistence needs. The Board acknowledged the need to focus on caribou conservation and that reductions in harvest limits may be needed in the future. Additionally, the Board suggested a more robust discussion of potential alternatives to the harvest limit reductions is essential. The Board stated that the Federal regulatory proposal process is the more appropriate avenue to allow an analysis to be written and reviewed by the public, all of the affected Councils, and our Federal and State agency partners in the range of the WACH, resulting in formal recommendations.

In January 2024, the BOG considered several proposals regarding WACH conservation. Proposal 2 requested reducing the caribou bag limit across the range of the WACH (Units 21D remainder, 22, 23, 24B remainder, 24C, 24D, and 26A) to four caribou per year, only one of which could be a cow. Proposals 36 and 37 requested the same bag limit reductions in Unit 23 only, and Proposal 37 requested closing the Unit 23 nonresident caribou hunt. The BOG adopted Proposal 2 and Proposal 36 as amended to reduce the caribou bag limit in Units 22, 23, and the southwestern portion of Unit 26A from 5 caribou per day to 15 caribou per year, only one of which may be a cow. The BOG deferred the remaining hunt areas in Units 21 and 24 to their March 2024 meeting, and took no action on Proposal 37. The BOG adopted the amended harvest limit reductions after much testimony from and discussion with subsistence users on workable solutions to balance conservation with reasonable opportunity, focusing on reducing cow harvest. The BOG adopted Proposal 38 as amended to establish a nonresident only drawing hunt with up to 300 permits for Unit 23, effective in the 2025 regulatory year.

In April 2024, the Board considered Proposal WP24-28/29, which requested a reduction in the caribou harvest limit across the range of the WACH to four caribou per year, only one of which may be a cow. The original request included Units 21D remainder, 24B remainder, 24C, 24D, and all caribou hunt areas within Units 22, 23, and 26A. In deference to the Northwest Arctic, North Slope, Seward Peninsula, and Western Interior Councils, the Board adopted WP24-28/29 with modification to exclude the eastern

portion of Unit 26A from the harvest limit reduction and to change the harvest limit to 15 caribou per year, only one of which may be a cow. The Board stated that the modification balanced the need for conservation of the declining WACH with subsistence uses and had support from a broad swath of local users. It also aligned with the recently adopted State regulatory changes.

Also in April 2024, the Board adopted WP24-30/31 with modification to close Unit 23 to caribou hunting by non-federally qualified users from Aug.1—Oct. 31. The modification was to add a stipulation that the closure only applies if the WACH is less than 200,000 caribou. The Board stated that the ongoing precipitous decline of the herd warranted strong measures to aid in the recovery and conservation of the caribou population. This Board decision supported the recommendations of the Northwest Arctic and North Slope Councils, while ensuring that the closure would not remain in effect longer than necessary.

In April 2026, the Board voted to maintain status quo on Wildlife Closure Review WCR26-45, in keeping with the recommendations of the Northwest Arctic, North Slope, and Seward Peninsula Councils. This is a closure to the harvest of caribou by non-federally qualified users on Federal public lands along the Noatak River, from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River, within the northern and southern boundaries of the Eli and Agashashok river drainages, respectively, and within the Squirrel River drainage (the Noatak Corridor Closure). The Board stated that this closure is still necessary to continue subsistence uses of the WACH for federally qualified subsistence users, and specifically for Noatak residents. In addition to original concerns about user conflict and herd deflection, which still apply, the herd also needs to be protected due to the serious conservation concerns with the population continuing to drop precipitously.

Also in April 2026, the Board rejected Wildlife Proposal WP26-53, which requested to change caribou seasons in portions of Units 22B and 22D to year-round, may-be-announced seasons. The Board rejected this proposal because it would have reduced subsistence opportunity in order to protect reindeer, a private commercial enterprise.

Controlled Use Areas

Noatak Controlled Use Area

In 1988, the Traditional Council of Noatak submitted a proposal to the BOG to create the Noatak Controlled Use Area (CUA) in order to restrict the use of aircraft in any manner for big game hunting from August 15-September 20 due to user conflicts (Fall 1990). The proposed Controlled Use Area extended five miles on either side of the Noatak River, from the mouth of the Eli River upstream to the mouth of the Nimiuktuk River, including the north side of Kivivik Creek (ADF&G 1988). The BOG adopted the proposal with modification to close a much smaller area extending from the Kugururok River to Sapun Creek from August 20-September 20.

The Controlled Use Area was expanded in 1994 and modified in 2017 (Betchkal 2015; Halas 2015; ADF&G 2017a). From 1994-2016, the Noatak Controlled Use Area consisted of a 10-mile-wide corridor (5 miles either side) along the Noatak River from its mouth to Sapun Creek with approximately 80 miles of the Controlled Use Area within Noatak National Preserve (NP) (**Map 5**, Betchkal 2015). The closure

dates from 1994-2009 were August 25-September 15. In 2009 (effective 2010), the BOG adopted Proposal 22 to expand the closure dates to August 15-September 30 in response to the timing of caribou migration becoming less predictable (ADF&G 2009). During the 2016/17 BOG regulatory cycle, the Noatak/Kivalina & Kotzebue AC proposed (Proposal 44) extending the upriver boundary of the Noatak Controlled Use Area to the Cutler River, citing increased user conflicts as their rationale (ADF&G 2017b). In January 2017, the BOG approved amended Proposal 44 to shift the boundaries of the Noatak Controlled Use Area to start at the mouth of the Agashashok River and end at the mouth of the Nimiuktuk River with approximately 105 miles within Noatak NP (**Map 5**, ADF&G 2017a).

In 1990, the Noatak Controlled Use Area was adopted under Federal regulations. In 1995, the Board adopted Proposal P95-50 to expand the time-period and area of the Controlled Use Area to August 25-September 15 and the mouth of the Noatak River upstream to the mouth of Sapun Creek, respectively, which aligned with State regulations as they existed at that time.

In 2008, Proposals WP08-50 and 51 requested modifications to the Noatak Controlled Use Area dates. These proposals were submitted in response to caribou migration occurring later in the season, to improve caribou harvest for subsistence users, and to decrease conflicts between local and nonlocal hunters. The Board deferred these proposals to the next regulatory cycle. In 2010, Proposals WP10-82, 83, and 85 requested similar date changes. The Board adopted WP10-85 to expand the time period during which aircraft are restricted in the Noatak Controlled Use Area to August 15-September 30, which aligned with the current State regulations.

Selawik National Wildlife Refuge: Area Not Authorized for Commercial Transporters and Guides

In 2011, Selawik National Wildlife Refuge (NWR) designated refuge lands in the northwest portion of the refuge as closed to big game hunting by commercial guides and transporters through their comprehensive conservation plan (USFWS 2011, 2014). These refuge lands are intermingled with private lands near the villages of Noorvik and Selawik (**Map 5**). The purpose of this closure was to minimize trespass on private lands and to reduce user conflicts (USFWS 2011).

At the winter 2021 meeting of the Northwest Arctic Council, a representative of Selawik National Refuge reported that only two hunters were brought into the refuge by air taxis and transporters in 2020. Because caribou are no longer abundant in Selawik National Wildlife Refuge in September, and because the non-resident moose season is already closed in Unit 23, the refuge no longer receives many fly-in hunters (NWARAC 2021a).

Noatak National Preserve Delayed Entry Controlled Use Area

In 2012, the NPS established a Special Commercial Use Area or “delayed entry zone” in the western portion of the Noatak NP (Halas 2015, Fix and Ackerman 2015). Within this zone, transporters can only transport nonlocal caribou hunters after a pre-determined date unless otherwise specified by the Western Arctic Parklands (WEAR) Superintendent in consultation with commercial operators, other agencies and local villages (Halas 2015). In 2020, the delayed entry end date was changed from September 15 to September 22 (NPS 2020) in response to requests from the Cape Krusenstern National Monument and

Kobuk Valley National Park SRCs and the Native Village of Noatak (Atkinson 2021, pers. comm.). The purpose of this zone is to allow a sufficient number of caribou to cross the Noatak River and establish migration routes, to limit interactions between local and nonlocal hunters, and to allow local hunters the first opportunity to harvest caribou in that area (**Map 5**, USFWS 2014; Halas 2015).

Aircraft in National Parks and Monuments

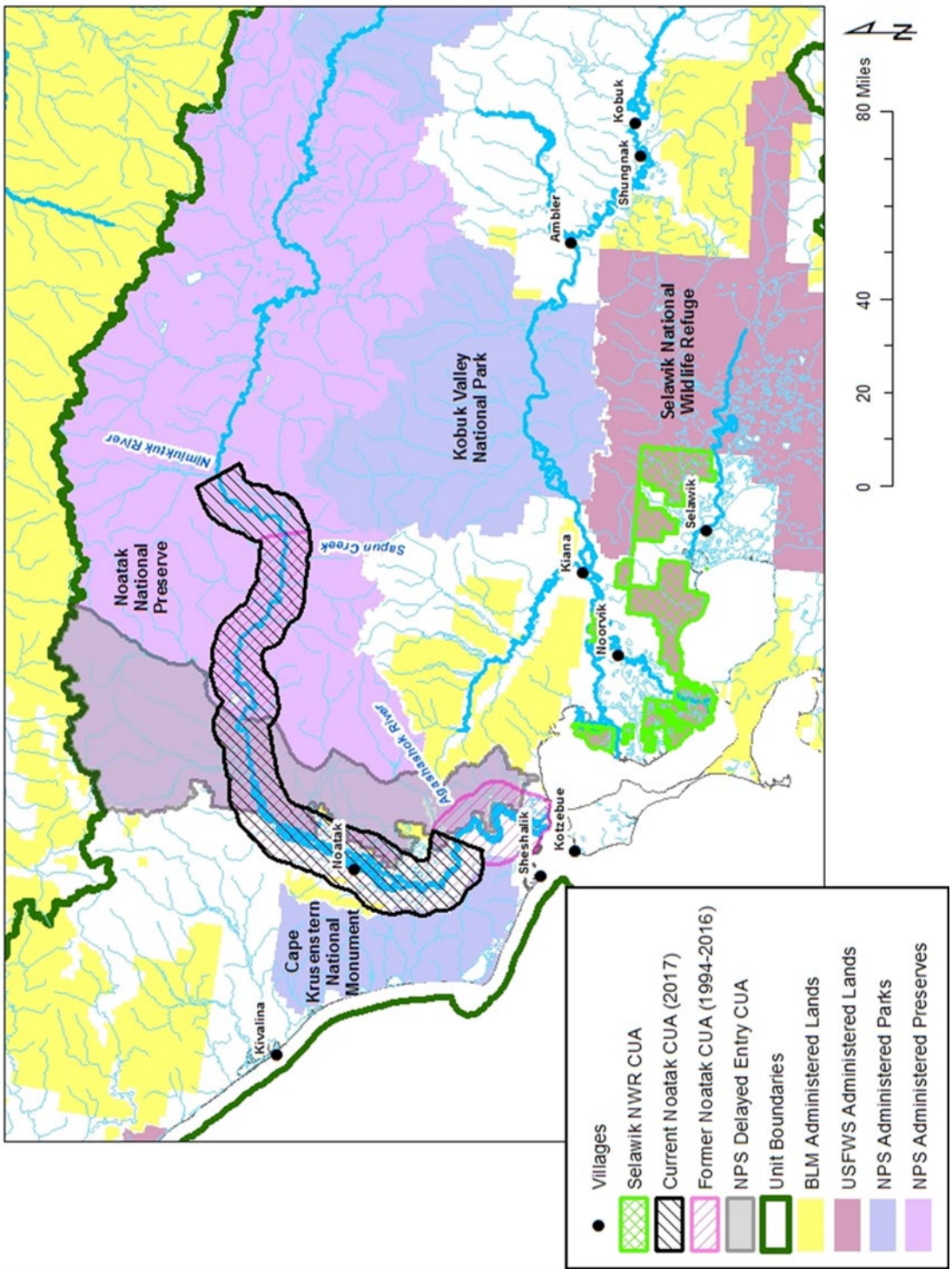
National parks and monuments in Unit 23 include Cape Krusenstern National Monument, Kobuk Valley National Park, and Gates of the Arctic National Park. The use of aircraft for access to or from lands and waters within a national park or monument for purposes of taking fish or wildlife within the national park or monument is prohibited, except in the case of exempted communities and individuals for the purpose of subsistence access. However, aircraft are allowed to access lands and waters in national parks and monuments for the purposes of engaging in any activity allowed by law other than the taking of fish and wildlife.

Anaktuvuk Pass Controlled Use Area

That portion of Unit 26A bounded by a line beginning at 153° 30′ W. long. on the game management boundary between Units 24 and 26A, north along 153° 30′ W. long. to 69° N. lat., east along 69° N. lat. to 152° 10′ W. long., south along 152° 10′ W. long. to 68° 30′ N. lat., east along 68° 30′ N. lat. to 150° 40′ W. long., south along 150° 40′ W. long. to the game management boundary between Units 24 and 26A, and westerly along the game management unit boundary to the point of origin at 153° 30′ W. long. From Aug 15 - Oct 15, the area is closed to the use of aircraft for caribou hunting, including transportation of caribou hunters, their hunting gear, and/or parts of caribou. However, this does not apply to transportation of caribou hunters, their gear, or caribou parts by aircraft between publicly owned airports in the controlled use area

Dalton Highway Corridor Management Area (DHCMA)

Units 20 and 24-26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River to the Arctic Ocean, and including the Prudhoe Bay Closed Area. The area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the DHCMA is closed to hunting; however, big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry. Any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the DHCMA.



Map 5. Federal and State controlled use areas in Unit 23.

Appendix 2

Table A1. For survey years in which the sex of harvested caribou was documented, this table shows the estimated total number of caribou harvested, as well as the percentage of the harvest that was male, female, or unknown for communities in Unit 23 (ADF&G 2023, 2026).

Community	Year	Estimated total number of caribou harvested	% Male	% Female	% Unknown
Ambler	2009	455	76%	24%	0%
	2012	685	69%	28%	2%
Buckland	2009	535	39%	35%	26%
	2016	693	56%	38%	6%
	2018	949	31%	48%	22%
Deering	2007	182	27%	31%	42%
	2013	404	19%	44%	38%
	2017	342	51%	44%	5%
Kiana	1999	487	84%	10%	6%
	2009	414	87%	5%	8%
	2021	295	89%	11%	0%
Kivalina	1964	256	50%	29%	21%
	1965	1010	28%	30%	42%
	1982	346	41%	47%	12%
	1983	564	29%	55%	15%
	2007	268	57%	37%	5%
Kobuk	2004	134	76%	24%	0%
	2009	210	78%	17%	5%
	2012	119	73%	19%	8%
Kotzebue	2012	1804	61%	20%	20%
	2013	1680	76%	20%	4%
	2014	1286	75%	17%	8%
Noatak	1999	683	66%	30%	4%
	2002	410	88%	12%	0%
	2007	442	73%	23%	4%
	2016	337	64%	34%	2%
Noorvik	2002	987	71%	23%	6%
	2008	767	73%	15%	12%
	2012	851	64%	24%	12%
	2017	250	41%	56%	3%
Point Hope	2014	185	62%	24%	14%
Selawik	1999	1289	62%	37%	1%
	2006	933	73%	26%	1%

Community	Year	Estimated total number of caribou harvested	% Male	% Female	% Unknown
	2011	683	60%	39%	1%
Shungnak	1998	561	50%	49%	1%
	2008	407	43%	50%	7%
	2012	395	71%	27%	2%
Average	**N/A**	**603**	**61%**	**29%**	**10%**

Table A2. For survey years in which the sex of harvested caribou was documented, this table shows the estimated total number of caribou harvested, as well as the percentage of the harvest that was male, female, or unknown for Point Lay and Wainwright in Unit 26A (ADF&G 2023, 2026).

Community	Year	Estimated total number of caribou harvested	% Male	% Female	% Unknown
Point Lay	2012	356	57%	42%	1%
Wainwright	2023	793	66%	29%	4%
Average		**575**	**64%**	**33%**	**3%**

Table A3. For survey years in which the sex of harvested caribou was documented, this table shows the estimated total number of caribou harvested, as well as the percentage of the harvest that was male, female, or unknown for Unit 22 communities (ADF&G 2026).

Community	Year	Estimated total number of caribou harvested	% Male	% Female	% Unknown
Brevig Mission	2000	76	28%	53%	20%
	2005	43	65%	35%	0%
	2006	43	66%	34%	0%
	2015	90	97%	3%	0%
Elim	1999	227	68%	20%	12%
	2006	150	77%	17%	6%
Golovin	2001	94	55%	18%	28%
	2012	64	69%	8%	22%
Koyuk	1998	263	64%	30%	6%
	2004	425	46%	32%	21%
	2006	447	53%	30%	17%
	2016	143	86%	9%	5%
Saint Michael	2006	17	100%	0%	0%
Shaktoolik	1998	167	49%	36%	15%
	1999	125	49%	34%	18%
	2009	133	65%	35%	0%
Shishmaref	2000	299	39%	37%	24%
	2006	827	59%	38%	3%
	2009	339	69%	26%	5%
	2014	487	54%	33%	13%
	2017	376	68%	19%	14%
Stebbins	2006	21	0%	100%	0%
	2013	26	76%	24%	0%
Teller	2000	21	38%	48%	14%
	2015	29	76%	7%	17%
Unalakleet	2002	167	65%	33%	2%
	2004	723	53%	31%	16%
	2006	554	31%	31%	38%
Wales	2006	7	43%	57%	0%
White Mountain	1999	93	59%	26%	15%
	2006	50	61%	9%	30%
	2008	99	71%	3%	26%
	2015	65	54%	34%	12%
Average	**N/A**	**203**	**56%**	**30%**	**14%**