

WSA26-02 Executive Summary

General Description	Wildlife Special Action WSA26-02 requests closing Federal public lands in Unit 22 to caribou hunting by non-federally qualified users for the 2026-2028 regulatory cycle. <i>Submitted by: Bering Land Bridge National Preserve.</i>
Proposed Regulation	See pages 4-5.
OSM Conclusion	Support
Western Interior Alaska Subsistence Regional Advisory Council Recommendation	Defer to the home region
Seward Peninsula Subsistence Regional Advisory Council	Support
Northwest Arctic Subsistence Regional Advisory Council	Support
North Slope Subsistence Regional Advisory Council Recommendation	Support
ADF&G Comments	None received
ISC Comments	
Public Hearing	4 Support; 6 Opposed

STAFF ANALYSIS
TEMPORARY SPECIAL ACTION
WSA26-02

ISSUES

Temporary Wildlife Special Action WSA26-02, submitted by the Bering Land Bridge National Preserve (BELA), requests closing Federal public lands in Unit 22 to caribou hunting by non-federally qualified users (NFQU) for the 2026-2028 regulatory cycle (**Map 1**).

Note: WSA26-01 requests reducing the caribou harvest limit in Units 22, 23, and the southwestern portion of Unit 26A to 4 caribou per year, only one of which may be a cow for the 2026/27 regulatory year. Many portions of this analysis refer back to the WSA26-01 “master” analysis.

Proponent Statement

The proponent states that this request is prompted by the most recent photocensus of the Western Arctic caribou herd (WACH) that found the WACH has declined to 120,618 animals in 2025. This estimate, down from 152,000 caribou estimated in 2023, continues the precipitous decline that began in 2003. At the current rate of decline, approximately 10% per year, the herd will drop below 100,000 by 2027.

The Western Arctic Caribou Herd Working Group (WACH Working Group), at its annual meeting in December 2025, assigned the management level “Critical, Declining” to the herd – the most severe level. Additionally, the group proposed a total moratorium on hunting WACH caribou if its population falls below 75,000 animals, with hunting only to resume when the population again reaches 100,000 caribou.

The proponent continues that most of Unit 22 and a small part of Unit 23 on the Seward Peninsula are considered the winter range of the WACH. Although collared animals from the herd have not made use of the Seward Peninsula for six years now, some remnant groups of WACH have been observed there, particularly in and around BELA. The portion of Unit 23 that coincides with the southeastern portion BELA is already closed to caribou hunting by non-federally qualified users Aug. 1 – Oct. 31. The dates of the closure in Unit 23 are tied to specific user conflict issues and are not necessary for Unit 22.

The proponent believes this action is necessary for the continuation of subsistence uses of WACH by federally qualified subsistence users (FQSU) in Unit 22 and is consistent with existing closures to NFQU in Unit 23. Further restrictions on caribou harvest under both state and federal management systems are expected in response to the continued decline of the WACH. The State Board of Game will next take up state hunting regulations for this region under its regular cycle in 2027; the Federal Subsistence Board is scheduled to next take up federal hunting regulations in 2028, and BELA staff intend to submit a similar closure proposal for that cycle.

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

Proposed 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.

Federal public lands are closed to caribou hunting for the 2026/27 and 2027/28 regulatory years, except by federally qualified subsistence users hunting under these regulations.

Unit 22A, remainder—15 caribou, only 1 may be a cow by State registration July 1–June 30,

permit. Calves may not be taken.

season may be announced.

Federal public lands are closed to caribou hunting for the 2026/27 and 2027/28 regulatory years, except by federally qualified subsistence users hunting under these regulations.

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.

Federal public lands are closed to caribou hunting for the 2026/27 and 2027/28 regulatory years, except by federally qualified subsistence users hunting under these regulations.

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

Federal public lands are closed to caribou hunting for the 2026/27 and 2027/28 regulatory years, except by federally qualified subsistence users hunting under these regulations.

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

Federal public lands are closed to caribou hunting for the 2026/27 and 2027/28 regulatory years, except by federally qualified subsistence users hunting under these regulations.

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

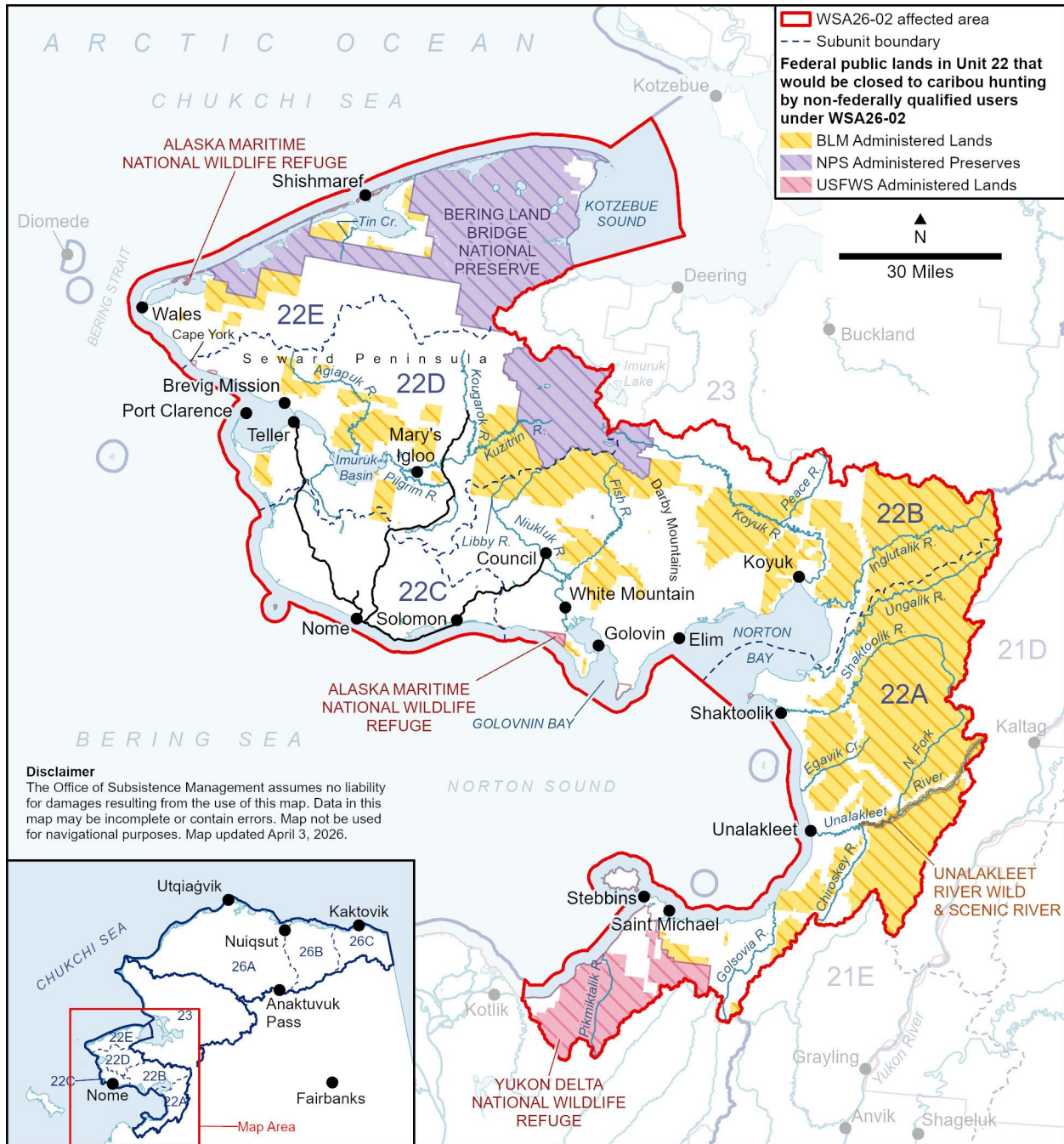
July 1-Mar. 31.

	<i>Nonresidents—1 bull HT</i>	<i>Aug. 1-Sep. 30</i>
<i>22A, remainder</i>	<i>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</i>	<i>May be announced</i>
	<i>Nonresidents—1 bull HT</i>	<i>May be announced</i>
<i>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)</i>	<i>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</i>	<i>May be announced</i>
	<i>Nonresidents—1 bull</i>	<i>May be announced</i>
		<i>May be announced</i>
<i>22B, remainder</i>	<i>Residents— Fifteen caribou total, only one of which may be a cow by permit.</i>	
	<i>Bulls RC800</i>	<i>No closed season</i>
	<i>Cows RC800</i>	<i>July 1-Mar. 31.</i>
	<i>Nonresidents—1 bull HT</i>	<i>Aug. 1-Sep. 30</i>
<i>22C</i>	<i>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</i>	<i>May be announced</i>
	<i>Nonresidents—1 bull HT</i>	<i>May be announced</i>
<i>22D, Pilgrim River drainage</i>	<i>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</i>	<i>May be announced</i>
	<i>Nonresidents—1 bull HT</i>	<i>May be announced</i>
<i>22D, in the Kuzitrin River drainage</i>	<i>Residents— Fifteen caribou total, only one of which may be a cow by permit.</i>	

<i>(excluding the Pilgrim River drainage) and the Agiapuk River drainage</i>	<i>Bulls RC800</i>	<i>No closed season</i>
	<i>Cows RC800</i>	<i>July 1-Mar. 31.</i>
	<i>Nonresidents—1 bull HT</i>	<i>Aug. 1-Sep. 30</i>
<i>22D, remainder</i>	<i>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</i>	<i>May be announced.</i>
	<i>Nonresidents—1 bull HT</i>	<i>May be announced</i>
<i>22E, east of and including the Sanaguich River drainage</i>	<i>Residents— Fifteen caribou total, only one of which may be a cow by permit.</i>	
	<i>Bulls RC800</i>	<i>No closed season</i>
	<i>Cows RC800</i>	<i>July 1-Mar. 31.</i>
	<i>Nonresidents—1 bull HT</i>	<i>Aug. 1-Sep. 30</i>
<i>22E, remainder</i>	<i>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</i>	<i>May be announced</i>
	<i>Nonresidents—1 bull HT</i>	<i>May be announced</i>

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 (**Map 1**).



Map 1. Federal public lands in Unit 22 affected by WSA26-02.

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, Alakanuk, Chevak, Emmonak, Hooper Bay, Kotlik, Marshall, Mountain Village, Nunam Iqua, Pilot Station, Pitka’s Point, Russian Mission, Scammon Bay, and St. Marys have a customary and traditional use determination for caribou in Unit 22A.

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

Regulatory History

See **Appendix 1** of the WSA26-01 analysis.

Current Events

Temporary Wildlife Special Action WSA26-01, submitted by the Western Arctic Caribou 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.

Temporary Wildlife Special Action WSA26-03, submitted by the North Slope Regional Advisory Council (NSRAC) requests the closure of federal public lands in the southwest portion of Unit 26A SW to caribou hunting by NFQU for the 2026-2028 regulatory cycle.

Cape Krusenstern National Monument (CAKR) Subsistence Resource Commission (SRC) voted to support this closure in order to support a rural subsistence priority in the range of the WACH on Federal lands under ANILCA. Kobuk Valley National Park (KOVA) and Gates of the Arctic (GAAR) SRCs did not vote on WSA26-02.

See Wildlife Special Action WSA26-01 analysis for the public hearing summary.

Biological Background

See Wildlife Special Action WSA26-01 analysis for more comprehensive biological information.

The WACH wintered on the Seward Peninsula from the mid-1990's until 2019 (see **Maps 5, 6** in WSA26-01 analysis). However, since then, the herd has not migrated to Unit 22 during the winter, although local residents continue to observe groups of caribou on the Seward Peninsula year-round (WACHWG 2025, SPRAC 2023).

In April 2025, GPS collars were deployed on 25 caribou in Unit 22. The goal of this 3-year study is to understand where and how these caribou use habitat seasonally, develop a minimum count of caribou present year-round on the Seward Peninsula, and document local knowledge of Western Arctic caribou in Unit 22 (WACHWG 2025).

Cultural Knowledge and Traditional Practices

See Wildlife Special Action WSA26-01 analysis.

Harvest History

See Wildlife Special Action WSA26-01 analysis for more comprehensive information.

Other Alternatives Considered

Implement Population Threshold: One alternative considered was to implement a population threshold similar to the Unit 23 closure. Specifically, that Federal public lands would be closed to caribou hunting, except by federally qualified subsistence users unless the WACH population exceeds 200,000 caribou. However, since this closure would only be implemented for two years, and the WACH population will not rebound to 200,000 caribou in that time period, this alternative was not considered further.

Implement time period: Another alternative considered was to limit the time period of the closure, similar to the existing codified closure for Unit 23. In Unit 23, the closure period is from Aug. 1-Oct. 31, which covers the entire Unit 23 nonresident draw hunt of Aug. 1-Sept. 30. The nonresident caribou season in Unit 22 also runs Aug. 1 – Sept. 30, but is by harvest ticket, and suggests a similar closure period. However, given the severe and continued decline of the WACH, and its current management level of “Critical, Declining,” this alternative was not considered further.

Harvest limit restrictions to non-federally qualified users: Restricting the harvest limits of NFQUs to match any harvest limit restrictions for FQSU enacted through WSA26-01 was another alternative considered. This would still provide some harvest opportunity for NFQU on Federal public lands. However, the Councils did not consider this alternative, and it does not align with the harvest recommendations in the WACH Working Group’s management plan, which prescribe “closure of some federal public lands” when the WACH population is within the Critical management level (see **Table 1** in WSA26-01 analysis).

Limit Closure by Subunit: Another alternative considered is to limit the closure of Federal lands in Unit 22 to the Northern Seward Peninsula; specifically, Units 22B-22E and to exclude Unit 22A from the closure. The WACH have not frequented the middle and southern portions of Unit 22A since at least 2009 (**Maps 5, 6** in WSA26-01), and the remaining resident herds are not reported to occur in Unit 22A.

Discussion and Effects

If Temporary Wildlife Special Action WSA26-02 is approved, Federal public lands in Unit 22 will be closed to the harvest of caribou by non-federally qualified users (NFQUs) for the 2026-2028 regulatory cycle. Specifically, this cycle runs from July 1, 2026 – June 30, 2028. Only FQSU, those with a customary and traditional use determination for caribou in Unit 22, would be able to harvest caribou on Federal public lands in Unit 22. As calf harvest is permitted in Unit 22 under State regulations, but prohibited under Federal regulations, approving WSA26-02 would also eliminate calf harvest on Federal public lands.

This may increase hunting pressure on State or privately owned lands. State managed lands comprise 56.5% of Unit 22 and also encompass many of the villages in the unit (**Map 1**). If this request is adopted, user conflicts and concern about the effects of non-local hunters may increase on State managed lands.

If this special action request is approved, those with a history of residency and family connection in Unit 22 who are now residing in nonrural areas would not be able to harvest caribou on federal public lands in Units 22, as they are not federally qualified subsistence users. NFQU who are Native corporation

shareholders would still be able to hunt on Native corporation lands under State regulations if permission is granted by the landowners.

While harvest by NFQUs on Federal public lands would decrease, NFQU would still be able to access and harvest caribou on gravel bars below the mean high-water mark within Federal public lands, as they are considered State land. Reports from law enforcement and nonlocal hunters indicate caribou are commonly harvested on such gravel bars, which may suggest limited impacts of the closure.

This closure is focused on current herd numbers and classification under WACH Working Group management levels; the herd is currently being managed at the “Critical, Declining” level, and under this framework, it is recommended to restrict harvest to residents only, and closure of some Federal public lands to NFQU may be necessary (see **Table 1** in WSA26-01 analysis). Approving this special action request may result in increased subsistence opportunity for federally qualified subsistence users and a small reduction of harvest on the declining WACH. However, Temporary Wildlife Special Action WSA26-01 was submitted to reduce the federally qualified subsistence user harvest on the WACH.

The conservation impacts of this closure are connected to whether or not harvest limits are restricted. Approval of WSA26-01 as modified by OSM and recommended by the Northwest Arctic and Seward Peninsula Councils would restrict Federal harvest limits for the WACH to four bulls, eliminating cow harvest. However, the conservation impacts of approving WSA26-01 are determinate on whether local subsistence users can harvest caribou on Federal public lands under the more liberal State regulations. Approving both WSA26-01 (restricting Federal harvest limits) and WSA26-02 (closing caribou harvest on Federal lands under liberal State regulations in Unit 22) ensure the greatest conservation impacts to facilitate WACH recovery. If both WSA26-01 as modified by OSM and WSA26-02 are approved, then harvest on Federal public lands in Unit 22 would be restricted to 4 bulls by FQSUs with cow harvest eliminated and calf harvest prohibited.

OSM CONCLUSION

Support Temporary Wildlife Special Action WSA26-02.

Justification

ANILCA Title VIII requires that Federal land managers give subsistence uses of fish and wildlife priority over other consumptive uses. ANILCA §815(3) stipulates that restrictions on nonsubsistence uses are authorized if necessary for the conservation of healthy population of fish and wildlife or to continue subsistence uses of wildlife populations. OSM considers this closure necessary for both of these reasons as outlined below.

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 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. The WACH is currently being managed at the “Critical, Declining” level, and under this framework, it is recommended to restrict harvest to residents only, and that closure of some

federal public lands to non-federally qualified users may be necessary as a tool to help in the recovery.

With the continued decline of the WACH, and the concurrent WSA26-01, requesting to reduce WACH harvest limits for federally qualified subsistence users, it is appropriate to also limit non-subsistence hunting activities in Unit 22. Approving both WSA26-01 as modified by OSM and WSA26-02 ensure the greatest conservation measures for the WACH are implemented on Federal public lands. Restricting Federal harvest through WSA26-01 would not have any meaningful conservation effect if all users could still harvest cows and 15 caribou/year on Federal public lands under the more liberal State regulations. Because of this, OSM considers closure to nonsubsistence uses as necessary for the conservation of healthy caribou populations.

Furthermore, many subsistence users have expressed concerns over food security and the ability to meet their subsistence needs if harvest limits are reduced, indicating the need for closure to continue subsistence uses.

OSM recognizes radio-collared WACH cows and the bulk of the WACH have not migrated to the Seward Peninsula since 2019. However, caribou still occur on the Seward Peninsula; caribou harvest in Unit 22 is still managed as part of the WACH; closure of Federal lands to NFQUs aligns with the WACH Working Group's harvest management recommendations when the herd is in the "Critical" management level; the WACH population continues to precipitously decline, indicating severe conservation concerns; and if Federal public lands in Unit 22 remain open to NFQU, any conservation effects of Federal harvest limit reductions enacted through WSA26-01 are negated.

LITERATURE CITED

SPRAC 2023. Transcripts of the Seward Peninsula Subsistence Regional Advisory Council proceedings, November 1-2, 2023.

WACHWG (Western Arctic Caribou Herd Working Group). 2025. Western Arctic Caribou Herd Working Group Meeting. December 10-11, 2025. Anchorage, AK.

See Wildlife Special Action WSA26-01 analysis for more comprehensive information.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Western Interior Alaska Subsistence Regional Advisory Council

The Council voted to **defer** WSA26-02 **to the home region**. The Council deferred the requests to home region because they do not adequately protect interests of subsistence users because of discrepancies between State and Federal regulations. ADF&G may issue an Emergency Order to reduce State harvest limits, so the WIRAC voted to submit a WSA to align with any potential ADF&G EO's to remedy the regulatory discrepancy and protect subsistence users and the WACH.

Seward Peninsula Subsistence Regional Advisory Council

The Council voted to **support** WSA26-02. The Council referenced the substantial conservation concerns of the WACH. The Council stated that while it will be an adjustment for some, it will be beneficial in the long run.

Northwest Arctic Subsistence Regional Advisory Council

The Council voted to **support** WSA26-02. The Council references our comments made for WSA26-01, and notes that with the sacrifices that local hunters are making, non-local hunters also need to share with the burden of conservation

North Slope Subsistence Regional Advisory Council

The Council voted to **support** WSA26-02. The Council stated that it is important to provide a subsistence priority to support subsistence users within the impacted region due to the decline of the WACH.