

## WSA26–03 Executive Summary

<b>General Description</b>	Wildlife Special Action WSA26-03 requests closing Federal public lands in 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 to caribou hunting by non-federally qualified users for the 2026-2028 regulatory cycle. <i>Submitted by: the North Slope Subsistence Regional Advisory Council</i>
<b>Proposed Regulation</b>	<p><b>Unit 26—Caribou</b></p> <p><i>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.</i></p> <p style="text-align: center;"><i>Bulls may be harvested. <span style="float: right;">July 1-Oct. 14.</span></i></p> <p style="text-align: center;"><i>Dec. 6-June 30.</i></p> <p style="text-align: center;"><i>Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15. <span style="float: right;">July 16-Mar. 15.</span></i></p> <p><i>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.</i></p>
<b>OSM Conclusion</b>	<b>Support</b>
<b>Northwest Arctic Subsistence Regional Advisory Council</b>	<b>Support</b>
<b>North Slope Subsistence Regional Advisory Council Recommendation</b>	No official recommendation, but proponent of this request.
<b>ADF&amp;G Comments</b>	None received
<b>ISC Comments</b>	
<b>Public Hearing</b>	<b>3 Support; 6 Opposed</b>

**STAFF ANALYSIS  
TEMPORARY SPECIAL ACTION  
WSA26-03**

**ISSUES**

Temporary Wildlife Special Action WSA26-03, submitted by the North Slope Subsistence Regional Advisory Council (Council) requests closing Federal public lands in 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 (Unit 26A SW) to caribou hunting by non-federally qualified users (NFQUs) 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 data presented to the Western Arctic Caribou Herd (WACH) Working Group at their December 2025 meeting illustrates the continued decline in the WACH, now estimated at 120,618 animals. As a response to the herd’s declining numbers, the WACH Working Group assigned the management level “Critical, Declining” to the herd based on the current census of approximately 121,000 caribou and an adult cow survival rate of less than 80%. The WACH Working Group submitted Wildlife Special Action request WSA26-01, requesting a reduction in the Federal harvest limit for the WACH from 15 caribou, only 1 may be a cow to 4 caribou, only 1 may be a cow in Units 22, 23, and the southwest portion of 26A.

Because Wildlife Special Action WSA26-01 would greatly impact residents of the communities of Wainwright, Point Lay, and Point Hope, the NSRAC considers the closure of federal public lands in the southwest portion of Unit 26A to NFQUs to be necessary for the continuation of subsistence uses of caribou. The Council also notes that NFQUs frequently fly into hunting sites located directly along the WACH migratory pathway and believes the closure will directly benefit the herd. The Council asserts that federally qualified subsistence users (FQSU) should not be the only users to take action to ensure the continued viability of this caribou herd, and that subsistence uses should be given priority over the uses of NFQUs, as stated in ANILCA.

**Existing Federal Regulation**

**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 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.*

***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 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*

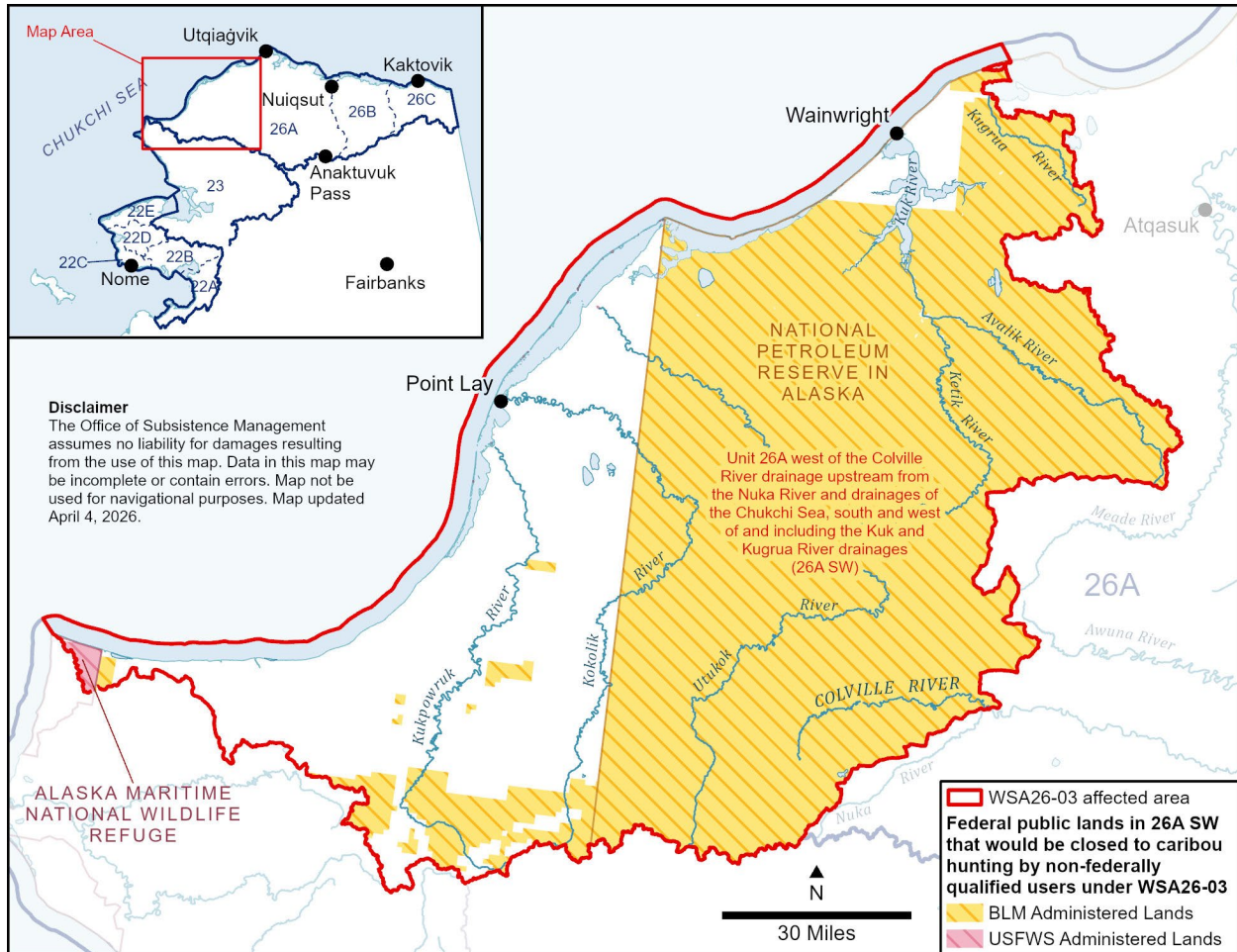
*Nonresidents—1 bull*

*July 15-Sep. 30*

## Extent of Federal Public 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 70% of Unit 26A SW and consist of 70% BLM managed lands and .002% USFWS managed lands (**Map 1**).



**Map 1.** Federal lands in Unit 26A SW hunt area affected by WSA26-03.

## Customary and Traditional Use Determinations

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

## Regulatory History

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

## **Current Events**

Temporary Wildlife Special Action WSA26-01, submitted by the 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 WSA26-02, submitted by the Bering Land Bridge National Preserve (BELA), requests closing Federal public lands in Units 22 to caribou hunting by non-federally qualified users.

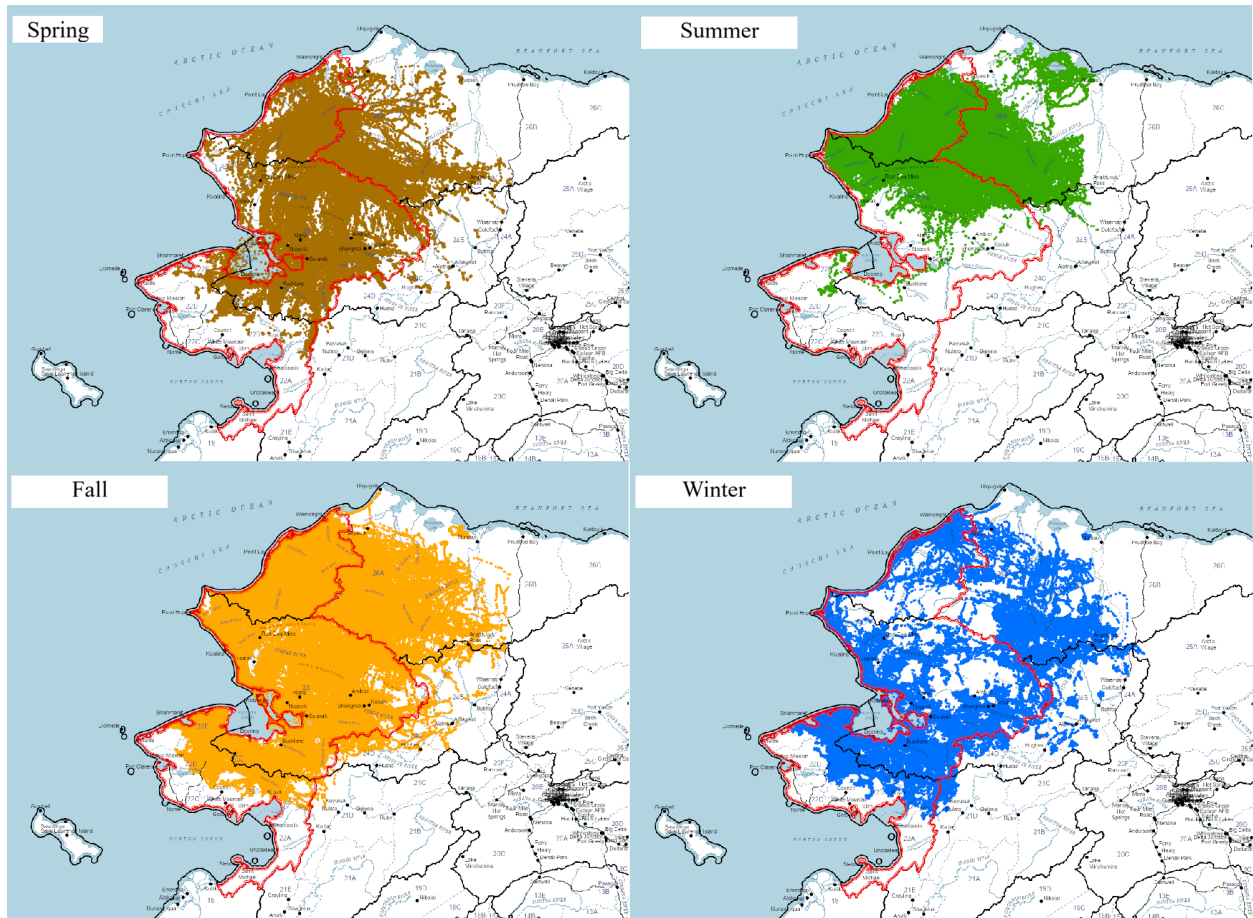
Cape Krusenstern National Monument Subsistence Resource Commission (SRC) voted to support this closure in order to support a rural subsistence priority in the range of the WACH on Federal lands under ANILCA. Gates of the Arctic National Park SRC also voted to support WSA26-03. They stated that with the high use of the WACH in the southwest portion of Unit 26A and subsistence users limiting themselves, this area should be closed to non-federally qualified subsistence users. Kobuk Valley National Park SRC did not vote on WSA26-03.

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

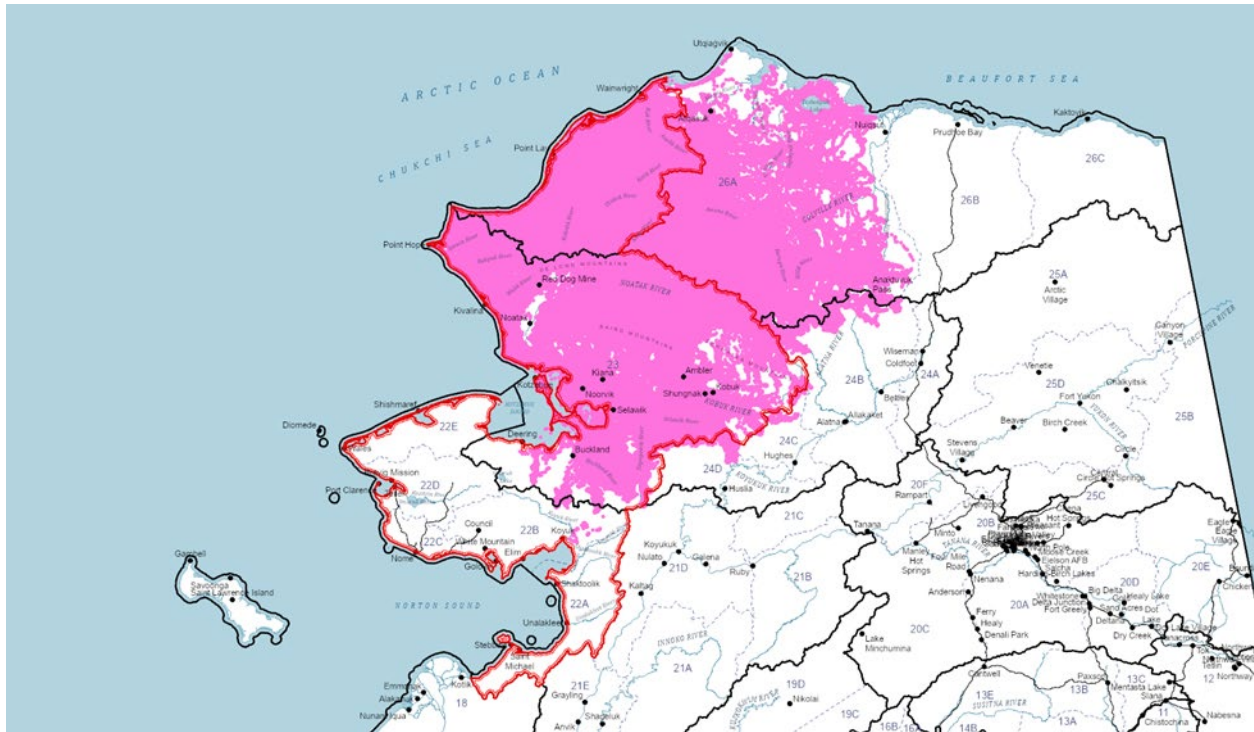
## **Biological Background**

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

The WACH occupies Unit 26A SW year-round. Their calving grounds primarily occur in this area, and portions of their insect relief and late-summer use areas have also historically occurred in Unit 26A SW. The WACH have also been increasing their winter use of Unit 26A SW in recent years (Joly and Cameron 2026) (**Maps 2, 3**).



**Map 2.** 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) (July 2026, pers. comm.).



**Map 3.** Recent recorded locations of all radio-collared WACH cows, 2020-2026 (July 2026, pers. comm.).

### **Cultural Knowledge and Traditional Practices**

See Wildlife Special Action WSA26-01 analysis.

### **Harvest History**

See Wildlife Special Action WSA26-01 analysis.

### **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 FQSU 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 26A SW runs Jul. 15 – Sept. 30 by harvest ticket, suggesting 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 FQSUs enacted through WSA26-01 was another alternative considered. This would still provide some harvest opportunity for NFQUs 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).

### **Discussion and Effects**

If Temporary Wildlife Special Action WSA26-03 is approved, Federal public lands in Unit 26A SW will be closed to the harvest of caribou by NFQU for the 2026-2028 regulatory cycle. Specifically, they would be closed from July 1, 2026 – June 30, 2028. Only FQSU, those with a customary and traditional use determination for caribou in Unit 26A, would be able to harvest caribou on Federal public lands in Unit 26A SW. As calf harvest is permitted in Unit 26A SW 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 30.5% of Unit 26A SW and also encompass many of the villages in the unit (**Map 1**). If this proposal 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 26A who are now residing in nonrural areas would not be able to harvest caribou on Federal public lands in Unit 26A SW, 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 NFQU 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 that 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. Approving this special action request may result in increased subsistence opportunity for FQSU and a small reduction of harvest on the declining WACH. However, Temporary Wildlife Special Action WSA26-01 was submitted to reduce the FQSU 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 4 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 WSA26-03 (closing caribou harvest on Federal lands under liberal State regulations in Unit 26A SW) ensure the greatest conservation impacts

to facilitate WACH recovery. If both WSA26-01 as modified by OSM and WSA26-03 are approved, then harvest on Federal public lands in Unit 26A SW would be restricted to 4 bulls by FQSUs with cow harvest eliminated and calf harvest prohibited. As significant portions of the WACH occupy Unit 26A SW year-round (**Maps 2, 3**), reducing harvest in this hunt area is especially important.

## **OSM CONCLUSION**

**Support** Temporary Wildlife Special Action WSA26-03.

### **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 restrict non-subsistence uses in Units 26A SW. Approving both WSA26-01 as modified by OSM and WSA26-03 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. Unit 26A SW is an important and frequently occupied part of the WACH’s range year-round (**Maps 2, 3**).

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.

## **LITERATURE CITED**

Joly, K. 2026. Wildlife Biologist, Gates of the Arctic National Park and Preserve. Personal communication: e-mail NPS. Fairbanks, AK.

Joly, K., and M.D. Cameron. 2026. Caribou Vital Sign Annual Report for the Arctic Network Inventory and Monitoring Program: September 2024–August 2025. Science Report NPS/SR—2026/385. National Park Service, Fort Collins, Colorado. <https://doi.org/10.36967/2317150>

NSRAC 2026. Transcripts of the North Slope Subsistence Regional Advisory Council proceedings, February 24-25, 2026.

## **SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS**

### **Northwest Arctic Subsistence Regional Advisory Council**

The Council voted to **support** WSA26-03. The Council believes that this closure is necessary for the continuation of subsistence uses and for the conservation of the WACH and references comments made in their recommendation on WSA26-01.

### **North Slope Subsistence Regional Advisory Council**

The Council submitted this request and concluded that, when management actions are needed to ensure the viability of the WACH population, subsistence harvest limits should only be reduced (via WSA26-01) 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.