

Regionwide and Multiple and Multiple Units

Proposal 5

5 AAC 92.XXX. New Regulation.

Add a new section to 5 AAC 92 regarding consideration of environmental change in game management decisions as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Add a new section as follows

5 AAC 92 XXX Consideration of environmental change in game management decisions

When evaluating proposals and adopting regulations for Game Management Units 22, 23, 24, 25, and 26, the Board shall consider the best available scientific information regarding long term environmental change, including the role of anthropogenic climate change, and its effects on wildlife populations, habitat, and sustained yield.

The Board shall include in its findings a brief statement describing how these factors were considered.

In making decisions, the Board shall recognize that long term environmental change may alter habitat capacity and population dynamics such that some populations may not return to historical levels.

What is the issue you would like the board to address and why?

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This regulatory cycle is focused on Arctic and northern Alaska, where the effects of environmental change are among the most pronounced in the state. However, the Board of Game is not explicitly required to consider long term environmental change, including the role of human caused climate change, when making wildlife management decisions in these regions.

A growing body of Alaska based research and Alaska Department of Fish and Game reporting demonstrates that long term environmental change is affecting game populations, particularly Dall sheep and caribou. Recent Board of Game materials document substantial and widespread declines in Dall sheep populations across multiple regions, including declines of approximately 40 to 70 percent in several mountain ranges.

Current research presented to the Board indicates that population trends are strongly influenced by environmental conditions affecting nutrition, pregnancy rates, and lamb survival. Changing weather patterns, including increased frequency of severe winter events, altered snow conditions, and habitat shifts such as shrub encroachment into alpine areas, are identified as key drivers.

Wildlife populations in Alaska have historically exhibited natural fluctuations, and climate variability has always been a factor in northern ecosystems. However, current data presented to the Board indicate a different pattern with more frequent and repeated environmental stressors occurring across multiple regions at the same time.

Similarly, while climate variability includes natural cycles, the scale, rate, and consistency of observed environmental changes in Arctic regions are not well explained by cyclical patterns alone. The available evidence indicates a shift in underlying baseline conditions, with population trajectories increasingly shaped by persistent environmental change rather than periodic variation.

Across northern Alaska and adjacent regions of Canada, some of the continent's largest remaining caribou herds and mountain sheep populations are experiencing synchronous declines, further suggesting broad scale environmental drivers.

In many areas, populations are likely to persist at lower densities rather than return to historical levels.

If the Board does not explicitly consider these factors, management decisions may continue to rely on assumptions of recovery based on cyclical patterns that may no longer apply, particularly in Arctic regions where these effects are magnified. This creates risk to sustained yield and long term hunting opportunity.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed independently, informed by publicly available Alaska Department of Fish and Game materials and current scientific literature on wildlife population dynamics in Alaska and northern North America.

PROPOSED BY: Paul Forward

(OI-F26-127)

Proposal 6

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend 5 AAC 85.025 to add a population-based closure for the Western Arctic Caribou Herd to read:

Notwithstanding any other provision of this section, when the Western Arctic Caribou Herd population has declined to 75,000 animals or fewer, the hunting season for caribou from the Western Arctic Herd shall be closed in Units 22, 23, 24B remainder, 24C, 24D, 26A. The season shall remain closed until the department determines that the population exceeds 100,000 animals and that a harvestable surplus exists.

What is the issue you would like the board to address and why?

The Western Arctic Caribou Herd (WACH) was once the largest caribou herd in Alaska, but over the past two decades it has declined by nearly 70 percent. Without significant management intervention,

the herd is expected to continue to decline. A July 2025 photo census estimated the herd at 121,000 caribou, representing an approximately 20 percent decrease since 2023.

At its annual meeting, the WACH Working Group assigned the herd a management status of “Critical, Declining,” based on the current population estimate of below 130,000 and an adult cow survival rate of less than 80 percent. Although specific management actions and harvest recommendations are associated with this status, the Working Group is proposing a hunting closure to reflect the severity of the continued population decline and support long-term recovery.

The Board of Game should establish a temporary closure of the hunting season for caribou from the Western Arctic Caribou Herd (WACH) in Units 22, 23, 24B remainder, 24C, 24D, 26A, if the herd population declines below 75,000. The season should remain closed until the WACH population exceeds 100,000.

Establishing a precautionary regulatory closure in response to the continued decline of the WACH would help prevent further reductions at critically low population levels and support the long-term sustainability of the herd.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the Western Arctic Caribou Herd Working Group. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

PROPOSED BY: Western Arctic Caribou Herd Working Group (OI-F26-119)

Proposal 7

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in GMUs 23, 22, 26A to four bulls and restrict cow harvest as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

GMU23, 22, 26a Residents - Four bull caribou total, no cows allowed.

What is the issue you would like the board to address and why?

The continued decline in the Western Arctic Caribou Herd and the need to lower the bull bag limit and eliminate cow harvest to support reversing the decline.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Kotzebue Sound Advisory Committee originated and supported this proposal unanimously.

PROPOSED BY: Kotzebue Sound Fish & Game Advisory Committee (OI-F26-033)

Proposal 8

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 22, 23, and southwest portion of 26A to four caribou per year per hunter, only one of which can be a cow as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

5 AAC 85.025. Bag limits for caribou.

Reduce the bag limit for taking caribou in Units 22, 23 and southwest portion of 26A to four caribou per year per hunter, only one of which can be a cow.

RESIDENT HUNTERS: Four caribou [FIFTEEN CARIBOU] total, only one of which may be a cow.

What is the issue you would like the board to address and why?

The Western Arctic Caribou Herd (WACH) was once the largest caribou herd in Alaska, but over the past two decades it has declined by nearly 70 percent. Data from Alaska Fish & Game biologists document a continual downward trend, with the July 2025 photo census estimating the herd at 121,000 caribou, an approximately 20 percent decline from 2023. Without harvest restriction management actions, continual population decline will remain a significant issue.

At its annual meeting, the WACH Working Group assigned the management level “Critical, Declining” to the herd based on a population less than 130,000 and adult cow survival rate less than 80%. This status indicates that management and harvest actions are necessary to allow for the herd populations to recover.

The WACH Working Group identifies the need to address the current herd decline by limiting the harvest of both bulls and cows for herd stabilization and recovery. In the units identified above, the current bag limit is set at 15 caribou total during the open periods for bulls and cows. The WACH Working Group proposes changing regulations to 4 caribou per person per year, with no more than one cow allowed.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed by the Western Arctic Caribou Herd Working Group. The Working Group consists of Alaska Native subsistence users from communities within the range of the herd, other Alaskan hunters, guides, transporters, conservationists, and reindeer herders. Since its formation in 1997, the Working Group has submitted numerous advisory recommendations to government agencies, regulatory boards, and other bodies to support decisions that will ensure the long-term conservation of the WACH.

PROPOSED BY: Western Arctic Caribou Herd Working Group (OI-F26-118)

Proposal 9

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the current caribou bag limit in Units 22, 23, and the southwestern portion of 26A to four bulls per regulatory year and close the cow caribou hunt as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

5 AAC 85.025, Hunting seasons and bag limits for caribou. Modify the current resident caribou hunting season in Units 22, 23, and 26A as follows:

Unit 22A, North of the Golsovia River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A

COW] by permit available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22A, Remainder

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not

be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 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 the Niukluk River drainage above, the mouth of the Libby River)

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A

COW] by permit available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY. COWS MAY

NOT BE TAKEN APR 1-AUG31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22B, Remainder

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A

COW] by permit available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22C

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not

be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG 31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22D, Pilgrim River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, ONLY 1 OF WHICH MAY BE A

COW] by permit available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY. COWS MAY

NOT BE TAKEN APR 1-AUG 31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

Unit 22D, in the Kuzitrin River drainage (excluding the Pilgrim River drainage) and the Agiapuk River drainage

RESIDENTS ONLY: Four bulls [FIFTEEN CARIBOU TOTAL, UP TO 5 PER DAY]. Bulls may not

be taken Oct 15-Jan 31. [COWS MAY NOT BE TAKEN APR 1-AUG 31] Permits available online at [http:// hunt.alaska.gov](http://hunt.alaska.gov) or in person in Nome and license vendors within Unit 22 beginning June 20.

What is the issue you would like the board to address and why?

The Western Arctic Caribou Herd (WACH) is undergoing an alarming and ongoing decline, with the most recent population estimate at 120,618 animals representing a significant drop from prior years. This trend underscores the urgent need to implement harvest restrictions across the range of the WACH to ensure the long-term viability of the herd.

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) proposes to modify the current caribou bag limit in Units 22, 23, and the southwestern portion of 26A to four bulls per regulatory year and to close the cow caribou hunt. The SPRAC firmly believes that the herd, at current population levels, does not have a harvestable surplus of cows and that this regulatory restriction is necessary to support the herd's recovery. The Council also supported a parallel Federal special action request to reduce the harvest limit and eliminate cow harvest under Federal regulations.

In addition to regulatory changes, non-regulatory measures—such as increased enforcement and enhanced hunter education—will also be essential to improving compliance and promoting sustainable harvest practices.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The proposal was developed during the March 2026 Seward Peninsula Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-047)

Proposal 10

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in Units 22, 23, and the southwest portion of 26A for resident hunters to four bull caribou and no cows for all open and ‘to be announced’ seasons as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Reduce the bag limit for caribou in Units 22, 23, and the southwest portion of 26A for resident hunters from 15 caribou, one of which may be a cow to four bull caribou and no cows for all open and ‘to be announced’ seasons.

What is the issue you would like the board to address and why?

Reduce the caribou bag limit for residents in Game Management Unit 22, 23, and the southwest portion of 26A to 4 bulls, eliminating cow harvest to assist in reversing the downward population trend of the Western Arctic Caribou Herd (WACH).

The Northwest Arctic Council believes that this reduction will help conserve the WACH 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, and human harvest is the one controllable factor.

While these measures may be challenging in the short term, they will benefit subsistence users in the long term – and this reduction in bag limits are not intended to be a permanent change; if everyone works together and acts responsibly, the reduction in bag limits and allowable animals could 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 is concerned that there could only be a few years remaining to hunting at the current level. This threatens our identity as caribou people. Ultimately, while these changes may be difficult now, they are a necessary investment for long-term conservation of the WACH as well as the well-being of future generations. There is currently a special action request submitted to the Federal Subsistence Board requesting a similar change in bag limits but would still allow one cow. The Northwest Arctic Council supported that request with the modification to remove the language that would allow the take of cows. The Federal Subsistence Board will act on that proposal after this proposal is due, but before the Board of Game meets on this proposal.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No. The Council did hear others were putting in similar proposals, but the Council did not work in conjuncture with anyone, although the proposal was drafted after ADF&G staff reports on the herd status and other information at the winter 2026 Northwest Arctic Council meeting.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-132)

Proposal 11

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou in GMUs 22, 23, 26A to 4 bulls per year as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Reduce the harvest of caribou to “4 bulls per year” (no cow harvest)

Reduction in harvest limits for caribou for units in the range of the Western Arctic Caribou Herd. Current regulations: 15 per year, 1 of which may be a cow.

What is the issue you would like the board to address and why?

The SRC had a long discussion about the proposal for a continued reduction in harvest and the impact of cow harvest. Members are concerned for their neighbors who may need a cow to get food on the table—but understand that the population cannot support it. The SRC recognizes that they are making this decision not only for them, but others as well. The SRC believes that though it is incredibly difficult to say ‘no cow harvest’ it is important to make a bold statement in order to protect this herd for the future and that we all need to be proactive. “We are talking about the future of the herd. Taking a little more time to search for bulls is minimal effort.”

After this voting to submit this proposal, the SRC voted to support with a modification the WSA26-01 with the same language of “reducing the harvest of caribou in Unit 22, 23, 26ASW to 4 bull caribou, no cows.” The SRC believes it is important to align state and federal regulations for the same units above.

The SRC states that since this is a shared herd, there is value in aligning regulations across its range and we all must work together.

The SRC also asked NPS and other agencies to continue outreach, specifically highlighting why there should be no harvest of cows, and let people know the more extreme regulations that could occur if the WACH does not make a rebound. Finally, the SRC reminded everyone that the regulations are not set in stone, we need to do something now and hope we can increase again in the future.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was written by the Kobuk Valley National Park Subsistence Resource Commission at their March 12-13 meeting in consultation with local ADFG caribou biologist.

The SRC is a nine-member Federal Advisory Council created in ANILCA 808. The SRC has three seats assigned by the Governor of Alaska.

The proposal will be presented to the Cape Krusenstern National Monument Subsistence Resource Commission and the Northwest Arctic Regional Advisory Council. The proposal will also be shared with the Kotzebue AC on March 23, and other local ACs.

PROPOSED BY: The Kobuk Valley National Park Subsistence Resource Commission (OI-F26-009)

Proposal 12

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Modify the caribou bag limit in GMUs 23 and 26A to 5 bulls and eliminate cow harvest as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

FIVE BULL CARIBOU TOTAL. [FIFTEEN CARIBOU TOTAL, ONLY ONE OF WHICH MAY BE A COW]

What is the issue you would like the board to address and why?

The WAH has continued to decline to 121,000, below the management objective of 200,000. To address this we recommend eliminating all cow caribou harvest and reducing the bag limit to 5 bull caribou per hunter per year in that portion of GMU 26A that is the Colville River drainage upstream from and including the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages and the portion of GMU 23 north of and including the Singoalik River drainage.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Developed by the North Slope Advisory Committee.

PROPOSED BY: North Slope Fish & Game Advisory Committee (OI-F26-021)

Proposal 13

5 AAC 85.025(a). Hunting seasons and bag limits for caribou.

Eliminate the cow caribou season for the Western Arctic Herd (WAH) in Units 22, 23 and the SW portion of 26A, as follows:

5 AAC 85.025(a)(17) is amended to read:

Open Season	Resident	
Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season
(17) Unit 22(A), that portion north of the Golsovia River drainage		
RESIDENT HUNTERS: 15 bulls [CARIBOU] total, by registration permit only[, ONLY ONE OF WHICH MAY BE A COW; COW CARIBOU MAY NOT BE TAKEN APR. 1 - JUNE 30]	July 1 - June 30	
NONRESIDENT HUNTERS: 1 bull	Aug. 1 - Sept. 30	
Unit 22(B), 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		
RESIDENT HUNTERS: 15 bulls [CARIBOU] total, by registration permit only[, ONLY ONE OF WHICH	Oct. 1 - Apr. 30	

MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - APR. 30]

up to 5 **bulls** [CARIBOU] per day
during the period May 1 -
Sept. 30, a season
may be announced by
emergency order[; COW
CARIBOU MAY NOT BE TAKEN
APRIL 1 - AUG 31]

(Season to be announced
by emergency order)

NONRESIDENT HUNTERS:
1 bull; during the period Aug.
1 - Sept. 30, a season may be
announced by emergency order

(Season to be
announced by
emergency order)

Remainder of Unit 22(B)

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:
1 bull;

Aug. 1 - Sept. 30

Unit 22(D), that portion in
the Pilgrim River drainage

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - APR. 30]

Oct. 1 - Apr. 30

up to 5 **bulls** [CARIBOU] per day;
during the period
May 1 - Sept. 30, a season

(Season to be announced by
emergency order)

may be announced by
emergency order[; COW
CARIBOU MAY NOT BE TAKEN
APRIL 1 - AUG. 31]

NONRESIDENT HUNTERS:
1 bull; during the period
Aug. 1 - Sept. 30, a season
may be announced by
emergency order

(Season to be
announced by
emergency order)

Unit 22(D), that portion in
the Kuzitrin River drainage
(excluding the Pilgrim River
drainage) and the Agiapuk
River drainage, including
the tributaries

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:
1 bull

Aug. 1 - Sept. 30

Unit 22(E), that portion east
of and including the
Sanaguich River drainage

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:
1 bull

Aug. 1 - Sept. 30

Remainder of Unit 22

RESIDENT HUNTERS:
5 **bulls** [CARIBOU] per day; by
registration permit only, during
the period Feb. 1 – Oct. 14]; COW
CARIBOU MAY NOT BE TAKEN
APR. 1 - AUG. 31; BULL
CARIBOU MAY NOT BE TAKEN
OCT. 15 - JAN. 31]

(Season to be announced
by emergency order)

NONRESIDENT HUNTERS:
1 bull; during the period Aug.
1 - Sept. 30 announced by

(Season to be
emergency order)

5 AAC 85.025(a)(18) is amended to read:

Open Season	Resident	
	(Subsistence and General Hunts)	Nonresident Open Season
Units and Bag Limits		

(18)

(B) on or after July 1, 2025, the hunting seasons and bag limits for caribou in Unit 23 are as follows:

Unit 23, that portion north
of and including the
Singoalik River drainage

RESIDENT HUNTERS:
15 **bulls** [CARIBOU] total, by
registration permit only[,
ONLY ONE OF WHICH MAY BE
A COW;]

July 1 - June 30

NONRESIDENT HUNTERS:

1 bull, by drawing permit only,
up to 300 permits may be issued
in combination with the
remainder of Unit 23

Aug. 1 - Sept. 30

Remainder of Unit 23

RESIDENT HUNTERS:

15 **bulls** [CARIBOU] total, by
registration permit only[, ONLY
ONE OF WHICH MAY BE A COW;
COW CARIBOU MAY NOT
BE TAKEN JULY 1 - AUG. 31 OR
APR. 1 - JUNE 30]

July 1 - June 30

NONRESIDENT HUNTERS:

1 bull, by drawing permit only,
up to 300 permits may be issued
in combination with that portion
of Unit 23 north of and
including the Singoalik
River drainage

Aug. 1 - Sept. 30

5 AAC 85.025(a)(21) is amended to read:

Open Season	Resident	
Units and Bag Limits	(Subsistence and General Hunts)	Nonresident Open Season

(21)

Unit 26(A), that portion
within 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

RESIDENT HUNTERS:

15 **bulls** [CARIBOU] total,
by registration permit only[,
ONLY ONE OF WHICH
MAY BE A COW;]

July 1 - June 30

NONRESIDENT HUNTERS:

1 bull

July 15 - Sept. 30

...

What is the issue you would like the board to address and why?

The Western Arctic caribou herd (WAH) has historically been the largest caribou herd in Alaska and has provided subsistence opportunity for up to 40 rural communities and other Alaskans across the state. This herd has a positive intensive management (IM) finding and a population objective of at least 200,000 caribou, and a harvest objective of 12,000-20,000 caribou. The WAH has been below the IM objective since 2021 (188,000 caribou). The long-term historical harvest for this herd has been estimated at 12,000+ caribou annually and the estimated harvestable surplus (HS) has been below 12,000 animals since 2020.

Despite regulatory changes that decreased bag limits and attempted to reduce the harvest of cows across Units 22, 23 and the western portion of 26A that took effect July 1, 2024, the WAH population has continued to decline. The HS for the WAH has decreased concurrently with the population decline and is estimated at 5,800 bulls and zero cows based on the 2025 census (121,000 animals). It is estimated that the annual harvest of cows is approximately 4,000 at present.

The HS is nearing the lower end of the combined amount reasonably necessary for subsistence uses (ANS) of 8,000-12,000 caribou from the WAH and Teshekpuk (TCH) herds, (5AAC 99.025). Continued decline from either or both of these herds will likely lead to an inability to provide for the ANS in the near future. Elimination of cow harvest has been identified as necessary step towards slowing the population decline.

PROPOSED BY: Alaska Department of Fish and Game

(HQ-F26-028)

Proposal 14

5 AAC 85.025. Hunting seasons and bag limits for caribou.

In Units 22 and 23, caribou taken by nonresident hunters and hunters ineligible for federal subsistence harvest under drawing permit hunts may be taken by bow and arrow only as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend regulations for caribou hunting in Units 22 and 23 as follows:

In Units 22 and 23, caribou taken by nonresident hunters under drawing permit hunts may be taken by bow and arrow only. In addition, in Units 22 and 23, caribou taken under RC907 by hunters who are not eligible for federal subsistence harvest may be taken by bow and arrow only.

What is the issue you would like the board to address and why?

The Western Arctic Caribou Herd is experiencing a substantial population decline. This decline is occurring in Arctic regions where environmental changes are occurring rapidly and at a larger magnitude than in other parts of North America.

While the causes of the decline are multifactorial, it is widely accepted that reducing harvest during a period of population contraction is an appropriate management response. At present, non-local, non-subsistence harvest in Units 22 and 23 remains relatively efficient due to the use of modern firearms.

Recent federal actions have restricted non-local caribou hunting on federal public lands in this region. As a result, current regulations differ between federal and state lands, creating inconsistency in management and hunter expectations.

If no changes are made at the state level, harvest opportunity and pressure may become unevenly distributed, potentially concentrating effort on state lands while federal lands remain closed. This may reduce the effectiveness of conservation measures intended to protect the herd.

At the same time, non-local hunting provides economic benefit to communities in the region. Eliminating hunting opportunity entirely would reduce these benefits and remove participation by a group that often contributes to conservation funding and advocacy.

This proposal addresses the need to reduce harvest pressure while maintaining hunting opportunity, improving consistency across land designations, and supporting continued economic activity.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-125)

Proposal 15

5 AAC 85.025. Hunting seasons and bag limits for caribou.

For all non-local, non-subsistence hunters participating under RC907 registration permits and general hunt conditions, restrict methods and means to bow and arrow only as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Amend regulations for caribou hunting in Units 22 and 23 as follows:

For all non-local, non-subsistence hunters participating under RC907 registration permits and general hunt (HT) conditions, restrict methods and means to taking caribou by bow and arrow only.

This restriction applies only to non-local, non-subsistence hunters and does not alter existing subsistence or local hunting regulations.

This change is intended to reduce overall harvest by decreasing harvest efficiency while maintaining opportunity for participation.

What is the issue you would like the board to address and why?

The Western Arctic Caribou Herd is experiencing a substantial population decline. This decline is occurring in Arctic regions where environmental changes are occurring rapidly and at a larger magnitude than in other parts of North America.

While the causes of the decline are multifactorial, it is widely accepted that reducing harvest during a period of population contraction is an appropriate management response. At present, non-local, non-subsistence harvest in Units 22 and 23 remains relatively efficient due to the use of modern firearms.

Recent federal actions have restricted non-local caribou hunting on federal public lands in this region. As a result, current regulations differ between federal and state lands, creating inconsistency in management and hunter expectations.

If no changes are made at the state level, harvest opportunity and pressure may become unevenly distributed, potentially concentrating effort on state lands while federal lands remain closed. This may reduce the effectiveness of conservation measures intended to protect the herd.

At the same time, non-local hunting provides economic benefit to communities in the region. Eliminating hunting opportunity entirely would reduce these benefits and remove participation by a group that often contributes to conservation funding and advocacy.

This proposal addresses the need to reduce harvest pressure while maintaining hunting opportunity, improving consistency across land designations, and supporting continued economic activity.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was developed independently. Input from local advisory committees and Alaska Department of Fish and Game staff would be valuable during the review process.

PROPOSED BY: Paul Forward (OI-F26-126)

Proposal 16

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Restrict nonresident caribou harvest in GMUs 26A, 23, and 22 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

NO HARVEST [ONE BULL]

What is the issue you would like the board to address and why?

The WAH has continued to decline to 121,000, below the management objective of 200,000. To address this we recommend eliminating all non-resident caribou harvest in GMU 26A, 23, and 22. Because residents of Alaska depend on this herd to feed their families and are restricting their harvest we don't believe non-residents should be harvesting caribou from the WAH until the population meets or exceeds the management objective of 200,000 animals.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

Developed by the North Slope Advisory Committee

PROPOSED BY: North Slope Fish & Game Advisory Committee

(OI-F26-023)

Proposal 17

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close caribou hunting to non-residents in units 22, 23, 26A as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Non-resident hunting of caribou in units 22, 23, 26A

Closure to non-resident hunting in units 22, 23, 26A

What is the issue you would like the board to address and why?

Justification: We must minimize stress of the WACH wherever possible. If subsistence users are taking their second reduction in 3 years, non-resident hunting needs to be closed. The SRC believes it is important to do whatever we can to keep food on the tables of local families of the 40 communities that rely on this herd. The KOVA SRC has submitted a proposal to reduce subsistence harvest in units 22, 23, 26ASW to 4 bull caribou (from 15 caribou, 1 of which may be a cow).

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This proposal was written by the Kobuk Valley National Park Subsistence Resource Commission at their March 12-13 meeting in consultation with local ADFG caribou biologist.

The SRC is a nine-member Federal Advisory Council created in ANILCA 808. The SRC has three seats assigned by the Governor of Alaska.

The proposal will be presented to the Cape Krusenstern National Monument Subsistence Resource Commission and the Northwest Arctic Regional Advisory Council. The proposal will also be shared with the Kotzebue AC on March 23, 2026, and other local ACs, and any other RACs or groups who are interested.

PROPOSED BY: Kobuk Valley National Park Subsistence Resource Commission (OI-F26-010)

Proposal 18

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close all nonresident caribou hunts in Units 22, 23, and 26 as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Close all nonresident caribou hunts in Units 22, 23, and 26.

What is the issue you would like the board to address and why?

Close all nonresident caribou hunts in Units 22, 23, and 26. The Northwest Arctic Council also submitted a proposal to reduce resident bag limits to four a year, with no cow harvest due to our extreme concern over the population trajectory of the Western Arctic Caribou Herd (WACH). With the sacrifices that subsistence users are making, non-local hunters need to also share the burden of conservation, and the Council believes that the closure is necessary for the continuation of subsistence uses and for the conservation of the WACH.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No. The Council did hear others were putting in similar proposals, but the Council did not work in conjuncture with anyone.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-131)

Proposal 19

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Limit the WACH bag limit in Unit 22 and 23 to four caribou total, with the same season dates currently in the subunits as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

Limit the WACH bag limit in Unit 22 and 23 to four caribou total. Keep the same season dates we currently have in the various subunits.

Caribou

Resident

Unit 22 & Unit 23

4 caribou total

What is the issue you would like the board to address and why?

Declining Western Arctic Caribou Herd and Continued High Bag Limits

With further decline of the Western Arctic Caribou Herd, it's time to reconsider a 15 caribou bag limit, one of which may be a cow.

During the last board cycle, there were several proposals to lower the WACH bag limit in Unit 23 from 5 per day to 4 caribou total, one of which may be a cow. RHAK supported that lower bag limit, though we had concerns about taking any cows with the herd in steep decline.

The board heard from rural stakeholders who felt that the proposed lower bag limit went too far, and the board amended Proposal 36 to lower the bag limit to 15 caribou total, one of which may be a cow, and included Unit 22 in that bag limit. We did not agree with such a high bag limit when the herd was in such decline, and we do not agree with it now.

RHAK testified in support of a Wildlife Special Action WSA 26-03 at a hearing on April 9, 2026 to lower the bag limit in Unit 23 to 4 caribou total, one of which may be a cow. However, after talking to biologists, with the herd in such drastic decline we don't believe any cows should be allowed to be taken. Those are the animals we need for recruitment and we just can't afford to take any at this time.

We understand that when caribou are available from mid-October to mid-November that larger bulls may be in rut and the meat is no good, and during that time period it is preferred to take cows. If the board doesn't agree to eliminate all cow harvests, another option may be to just allow the opportunity to take one cow during the time period when bulls are in rut.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

PROPOSED BY: Resident Hunters of Alaska (OI-F26-097)

Proposal 20

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish an Intensive Management plan for the Western Arctic caribou herd in Units 22, 23, and 26A as follows:

What is the issue you would like the board to address and why?

Establish an Intensive Management (IM) plan for the Western Arctic caribou herd (WAH) for the control of wolves and brown bears.

The WAH has historically been the largest herd in Alaska and has provided subsistence opportunity for up to 40 rural communities and other Alaskans across the state. This herd has a positive IM finding with population and IM objectives of at least 200,000 animals and a harvest objective of 12,000-20,000 animals (5 AAC 92.108). The WAH has been below the IM objective since 2021 (188,000 caribou). The long-term historical harvest for this herd has been estimated at more than 12,000 caribou annually and the estimated harvestable surplus (HS) has been below 12,000 caribou since 2020.

Despite regulatory changes that decreased bag limits and attempted to reduce the harvest of cows across Units 22, 23 and the western portion of 26A that took effect July 1, 2024, the WAH population has continued to decline. The harvestable surplus for the WAH has decreased concurrently with the population decline and is estimated at 5,800 bulls and no cows based on the 2025 census (121,000 caribou). Despite reducing the annual bag limit of cows to one per year in regulatory year 2024, according to permit data little to no reduction in cow harvest has occurred. The average annual harvest of cows from this herd is estimated at 4,000, which is no longer sustainable. Additional proposals submitted to the Board for consideration include the elimination of the cow season. In the short term, the department plans to close the cow season for RY 2027 through emergency order.

Currently, the harvestable surplus is nearing the lower end of the combined amount reasonably necessary for subsistence uses of 8,000-12,000 caribou from the WAH and Teshekpuk (TCH) herds (5AAC 99.025). The harvestable surplus for the TCH is estimated at 3,600, combining that with the harvestable surplus of 5,800 for the WAH, provides a combined surplus of 9,400 caribou. Continued

decline from either or both of these herds will likely lead to an inability to provide for the ANS in the near future.

The WAH has been identified as important for providing high levels of harvest for human consumptive use, and as a result, Alaska statutes require the herd to be intensively managed. Considering the rate of continued decline, the department is proposing an IM plan be codified to benefit the WAH. The department has been working to identify the feasibility of a successful predator removal program and has identified opportunities for the temporary removal of both predator species. Estimates of predation rates on the WAH suggest that predation, primarily from wolves and brown bears accounts for approximately 70% of the caribou mortality in this herd annually.

Wolves: Wolf density estimates are dated in Unit 23; the most recent efforts began in 1977 and concluded in 1991. Efforts to collar packs and subsequently estimate density, pack sizes, and predation on caribou are underway. The department plans to use this information to make informed decisions about the effectiveness of wolf removal on caribou recovery. If an IM plan is adopted and a feasibility assessment indicates wolf removal efforts could benefit the WAH, wolves would be lethally removed during the winter and spring in or near caribou wintering areas, primarily in Unit 23.

Brown Bears: Beginning in 2017 the department implemented a 3-year study of calf mortality which suggested that brown bear predation on the southern portion of the WAH calving grounds (Unit 26A) was a threat to calf survival. Additional mortality data from collared cows shows a relatively high proportion of adult cows being taken by brown bears enroute to the calving area north of the Brooks Range. If an IM plan is adopted and a feasibility assessment indicates brown bear removal efforts could benefit the WAH, brown bears would be lethally removed from the southern extent of the WAH calving grounds.

The department and the board are required to consider all the important, relevant, and material factors relating to the sustainability of a replenishable, public, wildlife resource prior to adoption of a regulatory proposal. The proposed intensive management predator control plan is designed to grow the WAH population to maintain harvestable surplus to offer hunting opportunity by reducing predation from wolves and brown bears. Brown bears and wolves preying on both adult and calf caribou may be removed. The proposed intensive management program for wolves and brown bears is designed to be sustainable for both species in the affected Units. All open seasons for harvest of wolves and brown bears will remain in the vicinity of the removal efforts.

The department is committed to the conscientious application of IM insofar as practicable of principles of management intended to sustain the yield of caribou, wolves and brown bears. The department has considered the role of predators in the ecosystem, as well as their distribution within the range of the WAH. Wolf and brown bear removal in this area under the proposed plan will occur in a small geographic area for a limited duration. Removing wolves and brown bears will have a

minor effect on the wolf and brown bear populations. In addition, adequate refugia exists to sustain predator populations in the large swaths of adjacent federally managed lands. The proposed IM program has been carefully developed and is adaptable as new observations and information become available.

If adopted, the department will present an IM feasibility assessment at a future board meeting.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-035)

Proposal 21

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish and implement an Intensive Management plan in Units 22, 23, and the southwestern portion of 26A, for the Western Arctic Caribou Herd (WACH) as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

5 AAC 92.XXX, Intensive Management Plans

Establish and implement an intensive management plan in Game Management Units 22, 23 and Unit 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 to facilitate the growth of the Western Arctic Caribou Herd (WACH). This program is designed to increase caribou abundance and harvest by reducing predation on caribou by wolves and bears. Thus, it is expected to make a contribution to achieving the intensive management (IM) objectives.

What is the issue you would like the board to address and why?

Establish and implement an Intensive Management plan in Units 22, 23, and the southwestern portion of 26A, for the Western Arctic Caribou Herd (WACH). The WACH is undergoing an alarming and ongoing decline, with the most recent population estimate at 120,618 animals representing a significant drop from prior years. This trend underscores the urgent need to implement necessary measures across the range of the WACH to ensure the long-term viability of the herd. At the latest WACH Working Group meeting in December 2025, the group classified the herd as "critical, declining," the lowest population tier in their management plan. This designation requires intensive efforts for the herd's survival.

The Seward Peninsula Subsistence Regional Advisory Council (SPRAC) requests the Board of Game establish an Intensive Management Plan across the range of the herd to curb caribou mortality as a result of predation by wolves and bears.

Of note, the SPRAC also submitted proposals to reduce the resident caribou harvest limit, and eliminate cow harvest in Units 22, 23, and the southwestern portion of Unit 26A, and close the nonresident hunt in Unit 22 as additional conservation measures for the WACH.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

The Seward Peninsula Subsistence Regional Advisory Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Game Management Unit 22. The Council provides a public forum for the expression of opinions and recommendations regarding matters related to the subsistence uses of fish and wildlife within the region, and we speak on behalf of 19 communities within the region. The proposal was developed during the March 2026 Council meeting at the request of Council members who reside in the region.

PROPOSED BY: Seward Peninsula Subsistence Regional Advisory Council (OI-F26-051)

Proposal 22

5 AAC 92.106. Intensive management of identified big game prey populations.

Establish an intensive management plan within the range of the Western Arctic Caribou Herd (WACH) as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

The Council is aware that ADF&G has begun conducting a feasibility study to assess the potential for implementing an IM plan to support the recovery of the WACH. While the Council is not certain of the anticipated timeline for completion of this study, it respectfully requests that ADF&G continue this work as needed. Additionally, the Council asks that an IM Plan be established at your January 2027 meeting, with the intent that implementation may begin as soon as it is determined to be feasible.

What is the issue you would like the board to address and why?

Establish an intensive management plan within the range of the Western Arctic Caribou Herd (WACH). The WACH’s population has been in decline for many years, and the herd is no longer an adequate subsistence resource for those that reside within their home range.

The population has been below 200,000 animals for five years, which is the trigger for Intensive Management (IM) set in statute. The Council was informed at our March 2026 meeting in Kotzebue that the Alaska Department of Fish & Game (ADF&G) was planning on conducting a study this spring in Unit 23 to evaluate the feasibility of instituting an IM program. The Council represents a region that is heavily dependent on the WACH and would like to see the next steps be taken to create an IM plan within the range of the WACH.

The Council recognizes that both wolf and bear seasons and harvest limits in Unit 23 are liberal under both Federal and State regulations, but we believe that additional help at removing predators would be highly beneficial to the recovery of the WACH.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

No. The Council did hear information presented by the ADF&G on the health and population of the WACH and heard that other entities may be putting in a similar proposal.

PROPOSED BY: Northwest Arctic Subsistence Regional Advisory Council (OI-F26-133)

Proposal 23

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Create an Intensive Management Plan to benefit the Western Arctic Caribou Herd as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

We propose that the BOG direct the ADF&G to implement an Intensive Management Plan to remove wolves and brown bears throughout the range of the WAH at a level high enough to expedite the recovery of this herd to its management objective of 200,000 or greater and to maintain predator removal for a minimum of five years once it meets or exceeds that objective.

What is the issue you would like the board to address and why?

The WAH caribou population is well below the management objective of 200,000 and enumerates 121,000 as of the summer of 2025. It has been declining for over 20 years. Bag limits have been reduced from 5 caribou per day with no closed season to 15 caribou per hunter per year of which only one cow could be harvested, and new proposals have been submitted to further reduce resident and non-resident bag limits and to allow only bull harvest. Hunters throughout the WAH range have reported an increase of wolf and brown bear populations and we believe that the BOG should authorize the ADF&G to implement a control program to remove wolves and brown bears throughout the WAH range (Units 22, 23 and 26ASW that is the Colville River drainage upstream from and including the Nuka River, and drainages of the Chukchi Sea south and west of, and including the Kuk and Kugrua drainages) to a level high enough to expedite the recovery of this herd to the management objective of 200,000 or greater for a minimum of five years once it meets or exceeds that objective.

Did you develop your proposal in coordination with others, or with your local fish and game advisory committee?

This was developed by the North Slope Advisory Committee

PROPOSED BY: North Slope Fish & Game Advisory Committee (OI-F26-022)

Proposal 24

5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A as follows:

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units... 26;

...

(8) Unit 22;

(9) Unit 23;

...

(13) Unit 18;

...

(b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain a resident tag to take a brown bear in the following units:

...

(4) Unit 18;

...

(7) Unit 22;

(8) Unit 23;

...

(10) Unit 26(A).

What is the issue you would like the board to address and why?

The Board of Game must reauthorize brown bear tag fee exemptions annually or the fee automatically reinstates. The department recommends continuing resident tag fee exemptions for the general season and subsistence season hunts in Region 5 (Units 18, 22, 23, and 26A).

General Season Hunts: Reauthorizations are needed for: Unit 18, where the tag fee has been exempted for 10 years; Unit 22, where the tag fee has been exempted for 20 years; Unit 23, where the tag fee

has been exempted for 15 years; and Unit 26A, where the tag fee has been exempted for 10 years. Tag fee exemptions are desired to allow: 1) incremental increase in annual harvest; 2) opportunistic harvest by resident hunters; and 3) harvest by a wide range of users.

General season brown bear harvest rates are within sustained yield limits and previous exemptions of the resident tag fee have not caused dramatic or unexpected increases in overall harvest. In Units 18 and 26A, tag exemptions were authorized for regulatory year (RY) 2012 and average harvests have remained within sustained yield limits and continue to be similar to the preceding 10-year period. In Unit 22, the 18-year tag-free period for residents has had an average annual harvest of 50 brown bears (range 41–63 bears). In Unit 23, general harvests have been increasing slowly since 1961 primarily in response to increases in human population rather than regulatory changes, although annual harvests vary due to weather and hunting conditions. Harvest data for Unit 23 show no trend in the sex ratio, age, or size of bears harvested under all types of hunts.

Subsistence Season Hunts: Reauthorizations are needed for Units 18, 22, 23, and 26A where brown bear subsistence hunt requirements currently include the exemption. Continuing the tag fee exemption helps facilitate participation in the associated brown bear harvest programs maintained by ADF&G for subsistence hunts.

In all units, subsistence brown bear harvest rates are low and well within sustained yield limits and exempting the resident tag fee has not caused an increase in subsistence harvest. In Unit 18, an estimated 0–3 bears are taken annually in subsistence hunts. In Unit 22, subsistence harvest by permit is quite low, averaging less than 1 bear per year (less than 1% of the total brown bear harvest). In Unit 23, subsistence permit harvest is less than 5 bears annually since 1992 (less than 10% of the total brown bear harvest). In Unit 26A, between 0 and 5 bears are taken annually by subsistence hunters. Only 6 subsistence permits were issued in Region 5 and 0 bears were taken RY2023.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F26-022)
