WP26-66 Executive Summary	
General Description	Wildlife Proposal WP26-66 requests to increase the harvest limit and extend the season for wolf hunting in Unit 23 to match State regulations. *Submitted by: Northwest Arctic Subsistence Regional Advisory Council.*
Proposed Regulation	**Proposed Federal Regulations** **Unit 23– Wolf Hunting** *Unit 23— ~~15~~ **20** wolves.* *~~Oct. 1~~ **Aug. 1**-Apr 30.*
OSM Preliminary Conclusion	**Support** Proposal WP26-66 **with modification** to exclude Cape Krusenstern National Monument and Kobuk Valley National Park.
Northwest Arctic Subsistence Regional Advisory Council Recommendation	
North Slope Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**None**

Draft Wildlife Analysis
WP26-66

ISSUE

Wildlife Proposal WP26-66, submitted by the Northwest Arctic Subsistence Regional Advisory Council (Council), requests to increase the harvest limit and extend the season for wolf hunting in Unit 23 to match State regulations. Specifically, WP26-66 requests increasing the hunting harvest limit to 20 wolves and extending the season to open August 1.

Proponent Statement

The proponent states that aligning the Federal wolf hunting regulations to match the State hunt will help reduce confusion and increase opportunity. Hunters have indicated an increased wolf population in Unit 23.

Current Federal Regulations

Unit 23− Wolf Hunting

Unit 23— 15 wolves.	*Oct. 1-Apr. 30*

Unit 23− Wolf Trapping

Unit 23— No limit.	*Nov. 1-Apr. 30*

Proposed Federal Regulations

Unit 23− Wolf Hunting

*Unit 23— ~~15~~ **20** wolves.*	*~~Oct. 1~~ **Aug. 1**-Apr 30.*

Current State Regulations

Unit 23− Wolf Hunting

Unit 23	*Residents and Nonresidents: 20 wolves* *Hides must be sealed within 30 days of kill.*	*Aug. 1-Apr. 30*

Unit 23− Wolf Trapping

Unit 23	*Residents and Nonresidents: No limit* *Hides must be sealed within 30 days after the close of the season.*	*Nov. 1-Apr. 30*

Extent of Federal Public Select Land or Water

Unit 23 is comprised of approximately 69% Federal public lands that consist of 43% National Park Service (NPS) managed lands, 17% Bureau of Land Management (BLM) managed lands, and 9% U.S. Fish and Wildlife Service (USFWS) managed lands.

Customary and Traditional Use Determination

Rural residents of Units 6, 9, 10 (Unimak Island only), 11-13, 16-26, and Chickaloon have a customary and traditional use determination for wolf in Unit 23

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

The resident zone communities for Kobuk Valley National Park and Cape Krusenstern National Monument include all NANA Regional Corporation communities (all Unit 23 communities except Point Hope). In order to be able to hunt wolves in Kobuk Valley National Park or Cape Krusenstern National Monument, communities must have both a customary and traditional use determination for the species in the area and be resident zone communities. All the resident zone communities meet both criteria.

Regulatory History

The Unit 23 Federal wolf hunting season and harvest limit were adopted from State regulations when the Federal subsistence program began in 1990 (10 wolves per year – Aug. 10 - April 30).

In 1994, the Alaska Department of Fish and Game (ADF&G) submitted Proposal P94-002 to reduce Federal wolf hunting seasons and harvest limits statewide, thus aligning them with State regulations. In Unit 23, ADF&G's proposal recommended an Aug. 10-Apr. 30 season and a harvest limit of 5 wolves per year. During their February 1994 meeting, the Northwest Arctic Council discussed the proposed season length reduction within the context of pelt primeness (i.e. underfur and guard hairs have reached maximum length and density since last molt), and at least three members stated that wolves harvested prior to November and after March had pelts that were not considered prime (NWARAC 1994). During further discussion, two members stated that killing wolves when pelts were not prime was "wasting" (NWARAC 1994). The Council subsequently recommended a Nov. 1-Mar. 31 season.

At their April 1994 meeting, the Federal Subsistence Board (Board) adopted Proposal P94-002 with modification to shorten the wolf harvest season from Aug. 10 - Apr. 30 to Nov. 10 - Mar. 31 and to reduce the harvest limit from 10 to 5 wolves per year, aligning Federal and State harvest limits for hunting wolves.

The Unit 23 Federal wolf hunting regulations remained unchanged until 2005. In contrast, the State liberalized wolf hunting harvest limits twice, raising it to 10 wolves for the 2002/03 season and then to 20 wolves starting for the 2004/05 season.

At their 2005 meeting, the Board adopted Proposal WP05-20 with the Council's modification, to increase the wolf hunting season and harvest limit to the current Federal regulation.

In 2007, the BOG increased the Unit 23 wolf hunting season by 10 days, opening August 1st instead of August 10th, effective July 1, 2008 (Westing 2009). The State hunting regulations for wolves in Unit 23 has not changed since and currently allows the harvest of 20 wolves from Aug. 1 - Apr. 30.

The State and Federal trapping regulations for wolves in Unit 23 are aligned with 'no harvest limit' and season dates of Nov. 1 – Apr. 30. Wolves may be taken by firearm under a trapping license under State and Federal regulations, except on NPS lands where trappers may not use a firearm to take a free-ranging furbearer under a trapping license.

Biological Background

Wolves occur throughout Unit 23, although biological information is extremely sparse. Their current status and abundance are unknown, although greater than they were in the 1980s and 1990s when predator populations were diminished from bounties and aerial control (ADF&G 2024; Fronstin 2025, pers. comm.). The movements and distribution of wolves are influenced by caribou, especially during winter. Wolves also prey on moose, sheep, beavers, and small game, allowing wolves to persist in areas devoid of caribou (Westing 2009). Predator populations follow prey populations. Prey species in

Unit 23 have declined, which may contribute to wolves taking greater risk searching for food closer to human populations (Fronstin 2024, pers. comm.).

While there have been no unit-wide surveys of the wolf population for Unit 23, testimony provided during Northwest Arctic Council meetings attests that the local abundance of wolves in Unit 23 is high, including in areas close to communities (NWARAC 2021a, 2021b, 2022a, 2022b, 2023a, 2023b, 2024a, 2024b, 2025). From 2019/20 to 2023/24, according to voluntary trapper questionnaires, the relative abundance of wolves in Region V, which includes Units 18, 22, 23, and 26A ranged from scarce-abundant. Sample sizes were low, ranging from 4-24 respondents for all of Region V, with no respondents from Unit 23 in some years (Bogle 2025).

Wolf density in the spring of 1990 was estimated to be 7.8-wolves/1000 km^2 (5.2-10.5 wolves/1000 km^2) in the middle Kobuk River (Ballard 1993). This is the only statistically derived estimate for wolf density in Unit 23. For comparison, wolf density was estimated to be 7.4 wolves/1,000 km^2 in Gates of the Arctic National Park and Preserve in 1986 (Adams and Stephenson 1986). Dau (2003) applied the Ballard (1993) density estimate across the area of Unit 23 (i.e. 112,466 km^2) and estimated a wolf population between 580 and 1,169 wolves, although all these estimates are now obsolete (Westing 2009).

In 2020, NPS began a pilot study within Noatak National Preserve titled 'Evaluating the Feasibility of Mixed DNA Sampling to Obtain Wolf Population Demographics in Northwest Alaska. The purpose of the study is to try and gain more knowledge about local wolf demographics and behavior, using genetic and observational methods (Fronstin 2024, pers. comm.). Spring aerial den surveys conducted from 2020 to 2022 estimated 4-5 active wolf groups within Noatak National Preserve (Fronstin 2024, pers. comm.).

Due to wolves' cooperative breeding and hunting strategies, high wolf mortality can affect their social structure, provisioning, distribution, genetics, and reproduction. High harvest can actually increase the number of wolves on the landscape. When alpha wolves are killed, the breeding inhibition is lifted on the rest of the pack, resulting in an increase in litters per year. Instead of one family rearing one litter per year, one family rears multiple litters in a year. NPS has observed this phenomenon in Unit 23 during surveys from 2020-2025 (Fronstin 2025, pers. comm.).

Harvest History

Wolves are required to be sealed, although compliance with the State fur-sealing program is low in Unit 23. Therefore, the harvest levels reported should be viewed as minimum estimates of harvest (Dau 2003, Westing 2009). Georgette (1999) suggests that <10% of the actual harvest is sealed. From regulatory year (RY) 2018 – RY2022, reported wolf harvest in Unit 23 averaged 33 wolves/year (ADF&G 2024). Data from the most recent household harvest surveys for each community, shown in **Table 1**, illustrate that harvest between communities can vary greatly. On average, communities harvested 15 wolves per study year (ADF&G 2025, **Table 1**).

In Unit 23, wolves are primarily harvested by local residents with firearms (81%) and by snowmachines (79%) (Dau 2003, Westing 2009). Local hunters are opportunistic and will harvest wolves incidental to travel between villages or while hunting caribou, typically taking as many wolves as possible during these opportunities. Ballard et al. (1997) reported that hunting was the largest cause of death, accounting for 69% of mortalities of radio-collared wolves, and hunters on snowmachines accounted for 96% of these mortalities. However, Westing (2009) reports that natural mortality may now be influencing abundance of wolves in Unit 23 more than harvests due to high gasoline costs.

From RY18-RY22, most reported wolf harvests occurred in September (19%) and March (19%). Few wolves were reported harvested in August, October, or November (**Figure 1**) (ADF&G 2024).

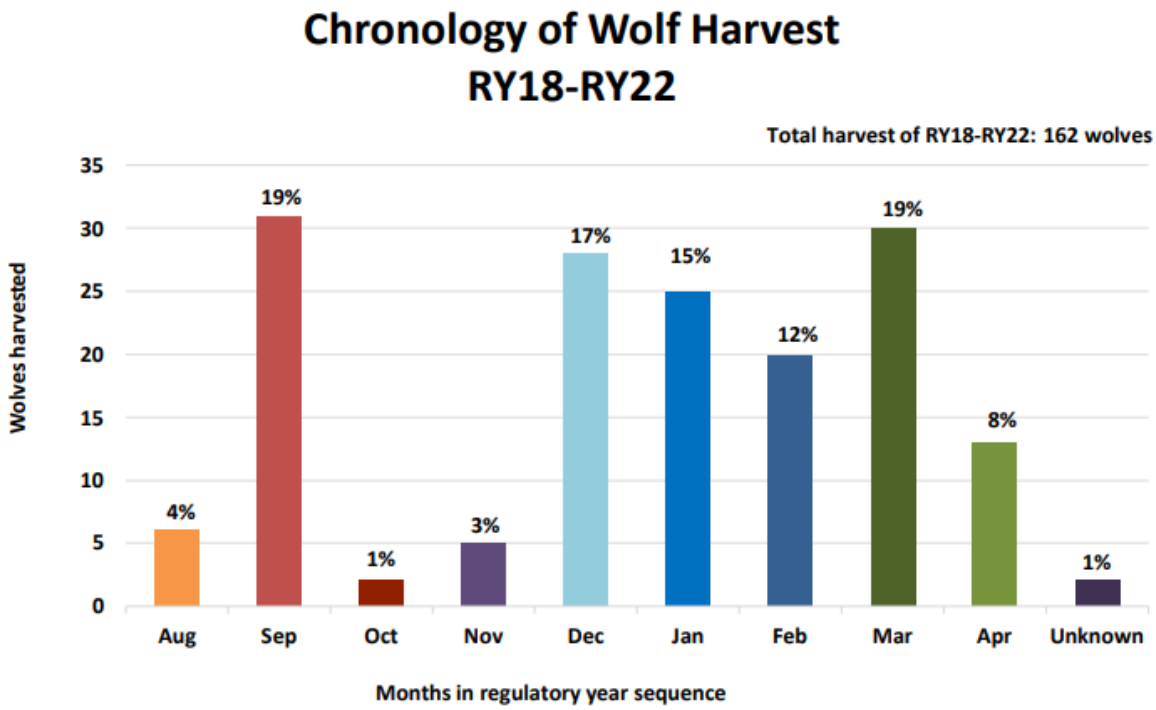

Figure 1. Chronology of reported wolf harvest in Unit 23. Figure from ADF&G presentation to the BOG in 2024 (ADF&G 2024).

Table 1. Four measures of wolf harvest and use by Unit 23 communities between 2010 and 2021 (ADF&G 2025).

Community	Survey Year	% HH Using	% HH Attempting to Harvest	% HH Harvesting	Estimated Total Number Harvested by Community
Ambler	2012	15%	9%	9%	20
Buckland	2018	9%	9%	7%	38
Deering	2017	2%	2%	2%	1
Kiana	2021	2%	2%	0%	0
Kivalina	2010	16%	18%	13%	20
Kobuk	2012	20%	17%	17%	18
Kotzebue	2014	1%	1%	1%	15
Noatak	2016	1%	6%	1%	1
Noorvik	2017	4%	2%	2%	3
Selawik	2011	16%	7%	4%	34
Shungnak	2012	9%	7%	7%	12
Average		**9%**	**7%**	**6%**	**15**

Alternative(s) Considered

One alternative considered was to exclude CAKR and KOVA from the harvest limit increase and season extension. These areas are closed to anyone hunting or trapping under State regulations. Taking an additional five wolves from a single area could wipe out entire packs, creating population sinks. An open season in August and September also encroaches further into pup rearing (Fronstin 2025, pers. comm.). Excluding these areas from the harvest limit increase and season extension could provide refugia and would represent a conservative approach as the status of the Unit 23 wolf population and their harvest is essentially unknown. This alternative would result in Federal regulations remaining more restrictive than State regulations.

Discussion and Effects

Adoption of this proposal would increase the Federal wolf hunting season and harvest limit to match State regulations, meeting the proponent's intent to increase opportunity for federally qualified subsistence users under Federal regulations. While most wolves in Unit 23 are harvested during the trapping season (Nov. 1 – Apr. 30) when fur condition and access are better, 19% of reported wolf harvest also occurs in September (**Figure 1**). Although pelts harvested in the early part of the season may not be in prime condition for sale, they are used for personal use in clothing and ruffs (NWARAC 2025).

If Proposal WP26-66 is adopted, the Federal wolf hunting season would be extended by two months (August and September) and the harvest limit would increase by five wolves (15 to 20). As 20 wolves can already be harvested on most Federal public lands in Unit 23 from Aug. 1 – Apr. 30 under State

regulations, the impact to the wolf population is expected to be minimal, but ultimately uncertain due to the unknown status of the wolf population and harvest in Unit 23. However, the trapping limit is 'no limit' and local area residents indicate the wolf population is increasing and there are no conservation concerns (NWARAC 2025).

Harvest in September is primarily by non-resident and non-local hunters who are in the unit for caribou, bear, or moose (Osburn 2025). However, State regulations do not apply in KOVA or CAKR. Therefore, additional wolves may be harvested from these areas by resident zone communities during August and September if this proposal is adopted (**Figure 1**).

Additionally, NPS lands prohibit the take of free-ranging furbearers with a firearm under a trapping license. While few users likely harvest more than 15 wolves by firearm each year, adopting Proposal WP26-66 would allow resident zone communities to harvest an additional five wolves from KOVA and CAKR by firearm each year.

Adopting this proposal would also decrease regulatory complexity and confusion by aligning State and Federal regulations as directed by Executive Order 14153 3(b)(xxii) to "ensure to the greatest extent possible that hunting and fishing opportunities on Federal lands are consistent with similar opportunities on State lands."

OSM PRELIMINARY CONCLUSION

Support Proposal WP26-66 **with modification** to exclude Cape Krusenstern National Monument and Kobuk Valley National Park.

The draft regulations read:

Unit 23− Wolf Hunting	
*Unit 23**, within Cape Krusenstern National Monument and Kobuk Valley National Park** — 15 wolves.*	*Oct. 1 -Apr 30.*
Unit 23 remainder— 20 wolves	***Aug. 1 – Apr. 30***

Justification

Adoption of this proposal would increase subsistence opportunity and would benefit federally qualified subsistence users. Impacts to the wolf population are expected to be minimal as users may already harvest 20 wolves from Aug. 1 – Apr. 30 under State hunting regulations on most Federal public lands in Unit 23, and local users report an abundant and increasing wolf population. Additionally, Federal and State regulations for wolves in the portion of Unit 23 where State regulations apply would be aligned, reducing regulatory complexity.

State regulations do not apply on National parklands, including CAKR and KOVA in Unit 23. Excluded NPS managed lands would retain the current Federal regulations as a conservative approach to providing refugia to Unit 23 wolf population as their population status and harvest is unknown.

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