

Northwest Arctic Subsistence Regional Advisory Council

c/o U.S. Fish and Wildlife Service
Office of Subsistence Management
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Mr. Ted Spraker, Chairman
Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The Northwest Arctic Subsistence Regional Advisory Council (Council) is one of ten Councils formed under the Alaska National Interest Lands Conservation Act (ANILCA). The Council is authorized by Title VIII of ANILCA to provide a forum for expressing opinions and offering recommendations on any matter related to subsistence uses of fish and wildlife within the region.

The Council held a public meeting on March 9-10, 2015 in Kotzebue, Alaska. The Council took public testimony and addressed various subsistence-related management issues, including Alaska State Board of Game Proposal 202, as well as a companion Federal proposal which will be submitted. Caribou is a vital resource to the people of our region and we understand and agree with conservative measures across the board being put into place, especially with many other factors affecting this herd such as severe icing conditions. We offer the following points and modifications for your consideration:

Dates for taking of Cows: No taking of all females from April 1-June 30; no harvesting of cows with calves starting July 1-October 10

Female cows should carry to full-term to ensure that no interference or harassment takes place during gestation and that they are protected during the crucial first year to increase calf survival rates. Great care should be taken in the protection of cows, as calves separated from the mother often do not survive. The Council believes the ability to harvest a cow without a calf after July 1 provides an opportunity to harvest meat while engaging in other subsistence activities such as berry picking.

Prohibition on the taking of calves

The Council agrees with the proposed prohibition of the harvest of calves; we are intent on protecting calves and their survival is especially crucial during this decline.

Close taking of bulls: October 10-Jan. 31; open Feb.1

Caribou meat is not ideal after the first of October, once bulls go into rut. Taking a bull caribou once it has gone into rut should be considered wanton waste, as the meat is not salvageable as food. At that point, the only purpose it serves is as a trophy. Large bulls should not be taken simply for trophy antlers when the resource is in decline.

Planned Federal regulatory proposal: reduction of take from 15 to 5 per day

The Council believes measures must be taken to protect the resource for future sustainability. Caribou is a vital resource for the Northwest Arctic region and conservation efforts must be put into place for all users to ensure future generations are able to harvest this main resource central to our physical, spiritual, and cultural well-being.

Thank you for the opportunity for this Council to assist the Department to meet its charge of protecting our sustainable resources for the maximum benefit of all Alaskans and the opportunity to comment on the Department's proposal. We look forward to continuing discussions about the issues and concerns of subsistence users of the Northwest Arctic Region. If you have questions about this correspondence, please contact me via Melinda Burke, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or (907) 786-3885.

Sincerely,



Enoch Attamuk Shiedt Sr., Chair
Northwest Arctic Subsistence
Regional Advisory Council

cc: Eugene Peltola Jr., Assistant Regional Director, Office of Subsistence Management
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management
George Pappas, State Liaison, Office of Subsistence Management
Jennifer Yuhas, Federal Liaison Team Leader, Alaska Department of Fish & Game
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