

Seward Peninsula Subsistence Regional Advisory Council

c/o U.S. Fish and Wildlife Service
Office of Subsistence Management
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12 MAR 2015

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 Seward Peninsula Subsistence Regional Advisory (Council) held a public meeting in Nome on February 18-19, 2015. Two issues brought up were the status of the Western Arctic Caribou Herd (WACH) and State Board of Game Proposal 202. Pursuant to its authority under Section 805 of the Alaska National Interest Lands Conservation Act, the Council is writing to express its concerns about Proposal 202.

After providing an opportunity for public testimony and reviewing information from the Alaska Department of Fish and Game regarding the current status of the WACH, the Council discussed and deliberated Proposal 202. The Council believes that the proposed restrictions on subsistence caribou hunting are not warranted at this time for the Seward Peninsula.

On State Board of Game Proposal 202, for the Seward Peninsula only, we conclude the following:

1. The proposal would not change the Seward Peninsula harvest enough to impact the WACH population in the region, and therefore would not benefit conservation. It is worthy to note that there is no information on the current level of harvest; rather, the current harvest estimate is based on averages over a twelve-year period. The Seward Peninsula caribou harvest is too low to have a measurable impact on the WACH.

2. The proposal would reduce hunting efficiency required for subsistence hunting. People often have to travel long distances to harvest caribou, and should not be restricted from opportunistic hunting of calves. There is no data available to show how many calves are taken by local hunters. Subsistence users typically do not take many calves, thus the harvest of calves should not create conservation concerns that need to be addressed. This proposal unnecessarily creates restrictions.
3. The proposal could affect the Federal reindeer herding program. It could potentially reduce caribou harvest in the region and lead to more caribou on the Seward Peninsula Region within established reindeer range. This could lead to the intermingling of reindeer and caribou and reindeer joining the caribou herd. This could adversely impact the regional practice of reindeer herding.

The Council appreciates this opportunity to provide input on management of this important subsistence resource for the residents of the Seward Peninsula. Should you have any questions about this correspondence, you may contact me through Adrienne Fleek, Subsistence Council Coordinator, Office of Subsistence Management, at (907) 786-3674 or adrienne_fleek@fws.gov.

Sincerely,



Tim Smith
Vice Chair

cc: Seward Peninsula Subsistence Regional Advisory Council
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
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Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management
George Pappas, State Liaison, Office of Subsistence Management
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Interagency Staff Committee
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