

**North Slope Subsistence Regional Advisory Council**  
c/o Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 787-3888, Fax: (907) 786-3898

RC 006

RAC/NS 19054.EP

JAN 15 2020

Ted Spraker, Chair  
Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Re: Comments for Alaska Board of Game **Proposal 26**

Dear Chairman Spraker:

I am writing to you on behalf of the North Slope Subsistence Regional Advisory Council (Council) to provide comments on **Proposals 26** coming before the Alaska Board of Game (BOG) at its Western Arctic/Western Region meeting scheduled for January 17 - 20, 2020, in Nome.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the North Slope Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 23-24, 2019 in Point Hope. Among the agenda items discussed were several Alaska Board of Game proposals that would affect subsistence users and resources in the North Slope Region. At that meeting the Council reviewed and made recommendations on the following 2019/2020 Alaska Board of Game Unit 26 wildlife proposal:

**Proposal 26:** Reauthorize the antlerless moose season in the western portion of 26A.  
**Support Proposal 26 with modification to add a Tier II management system so that local residents of communities in Unit 26 who are most reliant on this moose population for subsistence have the priority to harvest moose in this area.**

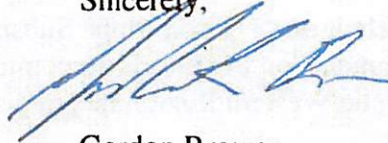
The Council supports to continued opportunity to harvest moose in the area west of 156 west longitude and north of the Colville River drainage which is important traditional hunting grounds for

subsistence communities in this area of Unit 26A. However, given the conservation concern and limited harvest opportunity for this moose population, the Council believes the State hunt regulations should be limited under a Tier II management system so that residents of Unit 26A who are most reliant on this resource have priority to hunt moose in this area. This would more closely align with the subsistence priority for moose under the current Federal regulations in this area.

The Council suggests that since the current State regulations allow all residents of the State of Alaska to hunt in this area of very limited moose population, that the new regulations include language for establishing a Tier II hunt so that only residents of Unit 26A which are most reliant on this moose population for subsistence have a priority for hunting moose in this area.

The Council thanks the Alaska Board of Game for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the North Slope Region. We look forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Eva Patton, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 786-3358 or [eva\\_patton@fws.gov](mailto:eva_patton@fws.gov).

Sincerely,



Gordon Brower  
Chair

Cc: Federal Subsistence Board  
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management  
Gregory Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management  
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
Pippa Kenner, Anthropologist, Office of Subsistence Management  
Tom Kron, Acting Council Coordination Division Supervisor, Office of Subsistence Management  
Eva Patton, Subsistence Council Coordinator, Office of Subsistence Management  
Ben Mulligan, Assistant Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
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