

ALASKA JOINT BOARD OF FISHERIES AND GAME
Fish and Game Advisory Committee System,
Subsistence Procedures, and Nonsubsistence Areas
October 12 - 16, 2013
Anchorage Hilton Hotel, Anchorage, Alaska
Public Comment Index

PC01	Tammy Evon
PC02	M Pamela Bumsted
PC03	Ahtna, Incorporated
PC04	Patrick Homes
PC05	Alaska Professional Hunters Association
PC06	USF&WS / Office of Subsistence Management
PC07	Kawerak, Inc
PC08	Kneeland Taylor
PC09	Sun'aq Tribe of Kodiak
PC10	Gates of the Arctic National Park Subsistence Resource Commission
PC11	Cordova District Fishermen United
PC12	Janet Mills



Submitted By Tammy Evon

Affiliation

Phone 1-907-545-3788

Email tammy_evon@yahoo.com

Address P.O Box 2735
Bethel, Alaska 99559

My name is Tammy Evon, I am an Alaskan Native I am Yupik originally from Bristol Bay, and I was born in Dillingham Alaska. My mother Carol Pavian is from Togiak Alaska, then in the year 2005 she got a job in Bethel Alaska for Y.K.H.C we then relocated to Bethel, Alaska. Now my mother has married to Samuel Berlin who is originally from Kasigluk they both are native Alaskan just like me and we all reside in Bethel Alaska to this day. As I was growing up in Togiak Alaska, I have noticed my whole family depending on subsistence all year long even during winter most of the boys would go out hunting and be gone for weeks at a time just to feed our family and not depend on the high cost of food that only keeps going up. My mother and step father live here in Bethel Alaska, they both love to depend on the land they reside on which happens to be located in Bethel, Alaska they both have a camp also known as fish camp. Now I always see both of them going out to fish camp every weekend or every chance they get so they can have more food on the table instead of paying the high cost of food in Bethel the reason they love hunting and gathering food is because Bethel is a high cost living rural area where most of their money goes on rent and bills and gas and fuel which is always most of their paycheck, that is the reason they like go gather subsistence all year long because once again I am going to say this it puts food on the table! And it's their way of life. Also my other concern about this proposal is that if Bethel becomes a non subsistence area, there will be families who will go hungry and they will have to depend on food stamps more heavily and the food they get from the state will only last for so long and if they run out of the food stamp money they will have to wait till the next month till they get more money for food, and this goes for gas as well the cost of gas and fuel is at a ridiculous price here in Bethel gas is over \$7.00 dollars a gallon and I know for a fact that some of the surrounding villages close to Bethel have gas prices that reach over ten dollars and that makes it harder for the hunters of the family to go farther on boats or snow machines or four wheelers to reach the hunting grounds. If this proposal happens this will cause families to do more things they don't want to do such as illegal activities and most likely forced to sell illegal dangerous drugs just to get the extra cash so they can go the extra mile for subsistence. I am against this proposal due to the fact that this will change families and their way of lifestyle around this rural area, think about it don't change our way of life just because there are more people wanting to live here I'm sure they didn't move to Bethel just to make it a City I'm sure they moved here to get a taste of the true rural Alaskan subsistence lifestyle.



Submitted By M Pamela Bumsted
Affiliation Alaskan rural resident

State Joint Boards Proposal 40

Kodiak is currently a subsistence area.

The Joint Board established the current nonsubsistence areas in 1992. There have been no changes to the Kodiak community which warrant a change in its current **subsistence area** status from *subsistence area* to *nonsubsistence area*, under any of the criteria used by the Joint Board.

Kodiak remains an area where dependence upon subsistence items is a principle characteristic of the economy, culture, and way of life of the area.

Therefore, Proposal 40 should be opposed.

/M Pamela Bumsted/



September 17, 2013

Alaska Dept. of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Ms. Tibbles:

Enclosed is the Ahtna Tene Nene' Customary and Traditional Use Committee's comments on the Alaska Joint Board of Fisheries and Game proposals.

Sincerely,

Roy S. Ewan
for Roy S. Ewan

Roy S. Ewan,
Chair



This page intentionally left blank



Joint Boards of Fish and Game Proposal Comments
October 12-16, 2013
Hilton Hotel

Proposal 8 5 AAC 97.005. Areas of jurisdiction for advisory committees.

Comments:

We are neutral on Proposal 8, we do not support or support Proposal 8 to clean up regulations by adding Susitna Valley and the Upper Tanana/Fortymile advisory committees and correcting the name of the PWS/Valdez Advisory Committee to the regulations. This is basically a housekeeping proposal to clean-up the regulations for establishing the areas for jurisdiction for emergency closures on taking fish and game.

Advisory Committee Uniform Rules of Operation

Proposal 9 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 9 to change the membership term dates from January 1st to December 31st to July 1st to June 30th. The current system and election dates are working fine. The dates of July 1st and June 30th are when fishing season is open, and many people will be out harvesting fish or commercial fishing. This change would make it difficult for advisory committees to hold a meeting for an election to occur. Summer months are the busiest times of the year in many rural areas.

Proposal 10 5 AAC 96.060(e)(3). Uniform rules of operation.

Comments:

We support Proposal 10 to clarify the Advisory Committee voting process. In 5 AAC 96.070 (e) Membership (1) it states that “to the extent possible, at least three user groups must be represented on each committee, and membership must include representative from each town or village located in the area that the committee represents”, this process makes it clear that 3 user groups must be represented from each town or village in the area that the advisory committee represents. It is up to the advisory committee and members of the public to vote on who they deem best to represent them. If ACs want to vote for all seats or for one



seat at a time, that should be up to ACs within that area. Regulations must be uniform for all ACs, but there must options for ACs to choose and pick from in voting for membership.

Proposal 11 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 11 to modify the nomination process for Advisory Committees. In 5 AAC 96.040. Qualifications for members, it states that “ a candidate must have knowledge of and experience with the fish and wildlife resources and their uses in the area, and have reputation within the community consistent with responsibilities of committee membership”, this regulation provides a reasonable and clear, definitive qualifications to serve on an advisory committee. A potential candidate for a seat on an advisory committee doesn't need to know Alaska Statutes or Alaska State Constitution or Alaska Administrative Code to serve on an advisory committee. They should be familiar with fisheries and wildlife regulations, Alaska Statutes affecting fisheries and wildlife, knowledge of fishing and hunting and their uses in the area, but they certainly do not need to know the Alaska State Constitution to serve on an advisory committee. They serve to make recommendations on fisheries and wildlife proposals. It is the Board of Fisheries and Board of Game' role and responsibility to know the Alaska Administrative Code and Alaska Statutes so then can make decisions on fisheries and wildlife proposal. Members of the advisory committee should not be held to a rigid standard as proposed in this proposal.

Assigning the selection of nominees with the advisory committees will take the elective voting process out of the hands of the public, and put it into the hands of the advisory committee to choose who the nominees will be and who can be elected by the public and advisory committee members. This will take the voting process out of the hands of the public, if the nominees are selected by the advisory committee members.

Additionally, a candidate should never have to submit a resume' to an advisory committee for consideration and nomination to an advisory committee. It is unnecessary, burdensome, intrusive, and dictatorial to require candidates to submit a vita to an advisory committee. Advisory committee members are not paid employees, and should not have to submit a vita.

Proposal 12 5 AAC 96.060. Uniform rules of operation.

Comments:

We adamantly oppose Proposal 12 to allow the commissioner to appoint and make final selection to the Anchorage Advisory Committee with designated seats for 7 different interest groups because this proposal will affect all advisory committees statewide. Advisory Committee regulations (5 AAC 96.060 - Uniform rules of operation) are the same for all advisory committees. Statewide uniform AC regulations should be kept in place.

If regulations are changed for the Anchorage advisory committee, other ACs will be requesting changes to regulations to fit their requests. If each of the ACs has different rules of operation, the regulations will be different, unclear, and ineffectual.

The Commissioner does not know each community or village as well as the local residents who live in the area do. The commissioner will not make a selection in the best interest of



that community or village. Additionally, the seven designated seats proposed in this proposal would be difficult or impossible for some communities and villages in rural areas to find and select people for these 7 designated seats: sport hunters and trappers (holding current hunting or trapping licenses); commercial fishers; biologists and others in the scientific community and commercial tourism operators.

If there are problems with the voting process, within the Anchorage Advisory Committee or other urban advisory committees, those advisory committees will have to fix their problems. Proposed changes to 5 AAC 96.060- Uniform rules of operation will adversely affect advisory committees from the rural areas. Forcing a statewide regulatory change to fix one advisory committee's problems does not do justice to rest of the advisory committees, who do not have a problem with representation on their advisory committee.

Proposal 13 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 13 shortening the number of days from 14 to days' notice to 10 days' notice for public notice of vacancy on an advisory committee, and adding number 4 to the Vacancy regulation about disciplinary actions taken by an advisory committee.

Shortening the number of days for public notice of a vacancy on an advisory committee will create hardship for advisory committees in the rural areas, where travel and information exchange will be difficult. It is challenging for advisory committee members to travel to a meeting, and to receive notice of a vacant AC seat in a timely manner. Many people who serve on ACs travel in adverse weather conditions and travel many air and highway miles to attend an advisory committee meeting.

The Joint Boards of Fisheries and Game have joint authority to administer advisory committee's role and functions and to write regulations. In 5 AAC 96.060 under **O Meetings**, section (r) **Rules of Meetings**, it states that "meetings of a committee must be conducted according to the latest edition of Robert's Rules of Order".

Robert's Rules of Order permits discipline, but not expulsion of its membership, unless the committee/assembly has written bylaws in place. Under Penalties of Robert's Rules of Order, the committee/assembly can vote to discipline its membership. As stated in Robert's Rules of Order, the committee/assembly has the right to remove anyone from its meetings for unruly behavior.

Proposal 14 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 14 to change AC regulations for each ACs, and instituting the Alaska State Constitution, Alaska Laws and other applicable regulations as required by the Joint Board of Fisheries and Game in their duties and responsibilities to the advisory committees.

Each advisory committee will have its own set of bylaws, which could be written differently. Creating new regulations to include bylaws for advisory committees will create



a new set of problems. The JBF&G will have to review each individual advisory committee bylaws of 81 advisory committees. Advisory committees do not need to have bylaws to function. Current system is working fine.

Regulation stating newly elected member shall be seated after an election is held should be kept in place. It should not be changed to seating the newly elected member, after January 1. Requiring that he or she wait until January 1 to vote and to be a member on an advisory committee would be ineffectual. The newly elected members could not participate and weigh in on fisheries and wildlife proposals.

Changing the length of days to submit forms for newly elected AC members is a good concept.

Proposal 15 5 AAC 96.060. Uniform rules of operation.

Comments:

We support Proposal 15 with an amendment to keep the committee members' term dates that are currently in place. The proposed changes from January 1 to December to July 1 to June 30 are unacceptable. Many rural subsistence users are busy during the summer months; they do not have time to hold a meeting for an election.

Under (2), removing the confirmation of an advisory committee member by JBF&G is good. The advisory committee membership and local communities know which person is the best person to nominate and elect to the advisory committee, and they should be have the authority to confirm its membership.

Removing the requirement that elections are to be held in the community for which the seat is held is an unnecessary, costly and burdensome regulation. During the cold, dark winter months, public members and AC members have to travel to outlying villages and communities to hold an election for an advisory committee seat for that village or community.

Vacant seats that are filled through an election should have full voting rights and office-holding privileges the remainder of the term upon commencement of term or election of a vacant seat. After elections, the candidate voted into office should have voting rights and office holding privileges, so that he or she can participate in the advisory committee meetings to give input and recommendations on matters brought before them.

Advisory committees shall give adequate public notice of the time period before it accepts nominations. Nomination process should have an adequate time limit. It would only be fair to have adequate notice time period for the public.

Two advisory committees should be able to hold a joint advisory committee without having to get permission from the JBF&G. It is costly and time consuming to acquire permission from the JBF&G to hold a joint AC meeting.



Proposal 16 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 16, it states in 5 AAC 96.060, under (O) **Meetings, (s) Record of Meetings**, “preliminary minutes of each committee meeting must be recorded in writing and forwarded to the director of the division of boards within three weeks after the meeting”. Each advisory committee has to conduct meetings under Robert’s Rules of Order and submit minutes to the director of the division of boards. Under Robert’s Rules of Order, record keeping of minutes is a requirement. After every advisory committee meeting, all of the items listed in (1) Minutes of this proposal, should be in the recorded minutes. Robert’s Rules of Order lists requirements for recorded minutes taken at a meeting. It would be redundant to spell out each requirement for recorded minutes. Advisory Committees will have to police its own advisory committee meetings to ensure minutes are taken accurately, timely and are finalized and submitted to ADF&G office.

Proposal 17 5 AAC 96.060. Uniform Rules of operation.

Comments:

We support Proposal 17 to clarify the Uniform Rules of operation regulations. We support clarifying regulations to “instate written request of the majority of AC members stating the reasons for removal, imposition on an administrative action for behavior inconsistent of a member, serious and substantial violation of conduct behavior, disciplinary measures under Robert’s Rules of Order, except for permanent removal of a member of cause under (n)”.

The Joint Board of Fisheries and Game should remove an advisory committee member through written request by the advisory committee stating the reasons for cause of removal. Disciplinary actions should be done at advisory committee meetings and a letter should be written to JBF&G to remove the member as a last resort. It is the Joint Boards of Fish and Game’s role and responsibility to take action to remove a member from an advisory committee. Advisory committee members could be sued, if wrongful actions are taken, this delicate matter must be handled by the Joint Boards, after a written request it submitted to them.

Proposal 18 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 18 to remove members from an advisory committee as stated in this proposal. It is the Board of Fisheries and Board of Game make decisions based upon sustained yield and to comply with the following regulations, 5 AAC 92.106 and 5 AAC92, 108; these regulations should not be included in the Uniform rules of operation for cause of removal of an AC member.

Comments under Proposal 17 address unruly behavior at advisory committee meetings. Members of an advisory committee will have to manage its membership under Robert’s Rules of Order, and take necessary action through a written request submitted to the Joint Boards of Fisheries and Game to remove a member.



Advisory Committee Membership Qualification

Proposal 19 5 AAC 96.060. Uniform rules of operation.

Comments:

We oppose Proposal 19 to change the qualifications for Chairperson and Vice Chairperson so that they have to have more knowledge than its membership to conduct advisory committee meetings or to serve at least 2 or 4 full terms of office to be qualified or that a waiver has to be written by the JBF&G if there isn't a qualified officer and to change the written notice to 10 days to replace an officer. If a secretary is not a member of an advisory committee, it makes sense that he or she should not have a vote, but may participate in the discussions.

Instituting a regulatory change to require them to serve a 2 or 4 year term and to have more knowledge before they can serve will not ensure that they will conduct meetings professionally. They may have more experience through observation and attendance at advisory committee meetings, but they may not behave in a professional manner. Requiring the Chairman to have more knowledge and serve 2 or 4 year term will only ensure that Chairman serves a longer term than other members, but it doesn't ensure that the Chairman will have more knowledge on issues.

Ten days' notice before the meeting to replace an officer is insufficient time; it should be kept at 14 days' notice. Members who reside in a rural area and serve on an advisory committee need to have more time period for notification.

Proposal 20 5 AAC 96.060. Uniform rules of operation.

Comments:

See comments under Proposal 18.

Proposal 21 5 AAC 96.040. Qualifications for members.

Comments:

See comments under Proposal 11.

Advisory Committee Status, Function, and Staff Assistance

Proposal 22 5 AAC 96.450. Committee status and change of status.

Comments:

We support Proposal 22 with an amendment to keep 5 AAC 96.450 as it is, clarify regulations on "reasonable time after notice is given" and to add "if the active committee does not object to the merger".

Today's technology provides an avenue so that advisory committee meetings can be held in various methods, such as Go To Meeting, Skype, video conference, or telephonically.



Advisory committee meetings can be held 2 times per year and minutes submitted on time. Each member of an advisory committee made a commitment to serve when they made the decision to serve and should be held accountable. If there is an adverse weather condition, then an advisory committee meeting, should be re-scheduled and AC meetings held so that recommendations will be made each year on fisheries and wildlife proposals.

Reasonable time is not defined in 5 AAC 96.450 (d), and should be defined in regulations so that the advisory committees will know what is meant by reasonable time.

Merging two advisory committees will create confusion and misunderstanding between two merged ACs, since each AC may not be familiar with the other ACs hunting and fishing area, inefficiencies will occur in coordinating and scheduling AC meetings. Each advisory committee will have a larger membership, they will have to make more recommendations and decisions and schedule AC meetings for a larger group of its membership. Merging two ACs may create more problems than solve the problem of an inactive advisory committee.

Proposal 23 5 AAC 96.050. Functions of local fish and game advisory committees.

Comments:

We support with an amendment Proposal 23 to only allow recommendations go to the State Boards of Fisheries & Game and to add the functions of Regional Advisory Councils to the functions of local fish and game advisory committee regulation. The Regional Advisory Councils exist only in regulations, they are non-existent.

Adding more responsibilities will ensure that advisory committees are performing existing roles and responsibilities and also making recommendations on ‘existing or proposed regulation, policy, or management plan, or any other matter relating to the use of fish and wildlife, including any matter related to fish and wildlife habitat, within its areas of responsibility as described in 5 AAC 97.005’, and to “recommend strategy for the management of fish and wildlife populations within the area of responsibility in 5 AAC 97.005 to accommodate the identified fish and wildlife uses and needs, and “anticipate subsistence uses of fish and wildlife populations within the region, and other fish and wildlife uses the that committee identifies, and “make recommendations to the Joint Boards on the creation, consolidation, distribution, or operation of the committee system” or “any other duties required under statute or administrative code not listed here” and “perform other duties specified by the board”.

Advisory committees are already making recommendations on management plans, policies, fish and wildlife habitats, making recommendations on unified rules of operations and anticipated uses of fish and wildlife within their areas, and recommending strategy for the management of fish and wildlife populations with their area of responsibility. It just isn't written in the regulations, that these are the function and responsibilities of the advisory committee. It should be written into regulation.



Proposal 24 5 AAC 96.510. Staff assistance.

Comments:

We oppose Proposal 24 to utilizing the advisory committees more and less of the focus/working groups when developing management strategies; staff assistance is already provided by the Boards of Fish and Game at advisory committee meetings.

The boards, department, advisory committees, public, and focus/working groups should all be working together to find a solution to problems. More input is needed to provide more rounded discussions and solutions to problems. Having such a diverse group of people from the public will ensure that everyone is heard, this provides more meaningful dialogue among the user groups.

Additionally, advisory committees are elected by a majority vote. If there is more than one group of users than another at an election, the majority vote wins the election and their people are voted in by the majority group of people. The minority at an election do not get their people elected to a seat on an advisory committee. If these people are then utilized as the public at Boards of Fish and Game meetings to work on problems, the minority will not have a voice in the matter or concern.

Adoption of Fish and Game Regulations

Proposal 25 5 AAC 96.610. Procedure for developing fish and game regulations.

Comments:

We support Proposal 25 to eliminating the last sentence in 5 AAC 96.610 (c), which states "Proposals postmarked after the deadline may be considered if the proposal is covered in the legal notice".

According to the department this is not currently allowed by the Board of Fisheries and Board of Game, late proposals are rejected. This will clean up regulations and loop holes in the regulations.

Leaving this regulation in place will leave open an opportunity for the public to take an advantage to submit late proposals and contend that they should be considered by the appropriate board, because it is in the regulations. Late proposals should not be considered by the Board of Fisheries and Board of Game.

Proposal 26 5 AAC 96.600 Meetings.

Comments:

We oppose Proposal 26 and support Proposal 27.



Proposal 27 5 AAC 96.600 Meetings.

Comments:

We support Proposal 27. In 5 AAC 96.600. Meetings (c) it states, “ The joint board will meet at least once each year to consider matters of mutual concern, including matters relating to committees and councils”. This should be changed to add “as needed”, so that the JBF&G will meet on a needed basis to consider concerns as they arise, especially disciplinary actions of advisory committee members.

Advisory Committee Participation at Board Meetings

Proposal 28 5 AAC 96.XXX. New Section.

Comments:

We oppose Proposal 27 to “incorporate advisory committee participation into board deliberations”. The Board of Fisheries and Board of Game have binders that they can refer to, if they have any questions on an advisory committee’s position on a fisheries or wildlife proposal. Board members can also ask the department, other board members, if they have questions about what was previously said at a fisheries or wildlife meeting.

One person from each advisory committee representing a region may assert his or her own influence in the process during deliberations. His or her opinions will be heard by the Board of Fisheries and Board of Game and be taken into consideration and deliberated and acted on by the Boards. An unfair representation will take place if this were to occur.

Other interest group’s voice will not be heard during deliberations. This will create an unfair and biased system. Memberships of advisory committees are elected by a majority vote. The minority vote will not be heard. Qualified customary and traditional user groups’ voice will not be heard during deliberations.

Other user groups and interest groups will ask the Board to have representation at State fisheries and wildlife meetings so that their group’s interest will be heard. This process will create a problematic system of the JBF&G deciding what interest group should be represented at State fisheries and wildlife meetings. Some but not all groups may be selected and others will feel that they are not being treated fairly.

It is the discretion of the Board of Fisheries and Board of Game to amend, change or fail to act on a fisheries or wildlife proposal. If they deem it best to change a fisheries or wildlife proposal, they are making a decision that is up to them. The Boards listen to the discussions and repeat what they hear in public testimonies. They are not as forgetful as this proposal makes them out to be. They take into consideration what the public has said in oral testimonies and written documentation before making decisions.



Proposal 29 5 AAC 96.600 Meetings.

Comments:

See comments under Proposal 28.

Regional Councils

Proposal 30 5 AAC 96.910. Definitions.

Comments:

We support Proposal 30 to remove Councils from the definitions. The Regional Advisory Councils are non-functional and exist only in regulations. Since RACs are not active, council wording should be removed from the definitions. It doesn't make sense to include definitions that are not useful.

Proposal 31 5 AAC 96.080. Interaction of local advisory committees with regional fish and game councils.

Comments:

See comments under Proposal 23.

Proposal 32 5 AAC 96.080. Interaction of local advisory committees with regional fish and game councils.

Comments:

See comments under Proposal 23.

Subsistence Uses & Procedures

Proposal 33 5 AAC Chapter 99. Subsistence Uses.

Comments:

We oppose Proposal 33 to “modify the process for determining Amount Necessary for Subsistence Findings”. Utilizing harvest tickets as the only means to determine ANS is not an accurate method to determine ANS. Determining ANS with only harvest tickets would not utilize harvest data from subsistence hunts such as Tier I, Tier II and the community subsistence harvest hunts. Using Harvest tickets to determine ANS could also include Non-local harvest data and Non-alien Residents data for large game species, which would mess up ANS, a 5-year period would not include good and bad years of harvest of fish and wildlife.

Methods to determine ANS for fish stock and game populations by the Alaska Boards of Fisheries and Alaska Board of Game are the same, but the procedures were different. The



Board of Game completed ANS in two ABOG meetings and the Boards of Fisheries worked on ANS region by region, whenever that region was on the ABOF's calendar.

“Subsistence Division has guidelines in place for determining ANS for fish stock and wild game populations. A positive C&T determination is determined for fish stock and game population by the Boards of Fisheries and Game. If a fish stock or game population can be harvested with sustained yield, the Boards will then determine ANS for a fish stock or game population. ANS is determined on a range of numbers or single number, depending upon the harvestable surplus. The Boards may take other information into consideration, but it ultimately has to justify and explain the reasons for doing so”.

“If there are different methods of determining ANS, it is because data is lacking for some communities or there are limitations or assumptions within ANS options. These communities are determined utilizing other data sources, such as a surrogate community or using an estimated harvest for a fish stock or game population that are based upon household surveys. If no harvest data is available, then most likely ANS is postponed until 3 to 5 years of data is gathered so that pattern and trends can be understood and determined. These methods are the most reliable and dependable sources of information to determine ANS for fish stock and game population”.

Proposal 34 5 AAC Chapter 99. Subsistence Uses.

Comments:

See comments under Proposal 33.

Proposal 35 5 AAC.021. Definition.

Comments:

We oppose Proposal 35 to create a Nonsubsistence harvest definition; “Nonsubsistence harvest” means fish stocks and game populations taken by nonresidents and aliens”. The word, Nonsubsistence harvest in 5 AAC 99.010(c) is comprehensible and logical. Creating such a term will take away the Tier II distinction, which states the process for providing for a preference for subsistence uses. Subsistence laws would be eliminated. Nonsubsistence harvest refers to Nonsubsistence consumptive uses of fish stock and game population. It is not a confusing term to the Alaska Boards of Fisheries or the Alaska Board of Game or the public.

Proposal 36 5 AAC 99.010. Boards of fisheries and game subsistence procedures.

Comments:

We do not have any comments Proposal 36; ABOG members said in a previous meeting that they would work on updating and deleting outdated regulations.

**Proposal 37 5 AAC.021. Definition.****Comments:**

We support Proposal 37 with an amendment to delete the words in section (i) “and not compiled over time”, and keeping the rest of the proposed definition as it is written in this proposal. A participant agreeing in a determined equal value of exchanging fish, shellfish and wild game between them is a good addition to the barter definition. However, adding the part about “and not compiled over time” refers to fish, shell fish and wild game being saved up over time and prohibiting, an exchange of resources between two participants. Many subsistence users preserve large quantities of fish and wild game over time to preserve it so they can exchange these resources with other people. With this addition to the barter definition, they will not be able to do this legally in the future. Salmon, moose, caribou and other resources are preserved in large quantities and exchanged by the Ahtna and other people. With this proposed definition, in the future, we will be criminals practicing our cultural traditions.

Bartering should not include indirect or direct profit, or re-selling of food items or nonedible items for profit, or individuals or businesses to provide services provided by the barter exchange. Barter is an age old customary and traditional practice that took place to exchange fish, shell fish, wild game and other resources to provide families with food that were needed and exchanged for, and this did not involve cash exchange or profit for an individual or families. Bartering should be kept in this manner to keep culture practices in place.

Nonsubsistence Areas**Proposal 38 5 AAC 99.015.****Comments:**

We oppose Proposal 38 to repeal the state Nonsubsistence Areas. This proposal is inconsistent with state subsistence laws which require the Joint Boards to identify Nonsubsistence Use Areas.

Proposal 39 5 AAC 99.015 Joint Board Nonsubsistence areas.**Comments:**

We oppose Proposal 39, to reduce the size of the Fairbanks Nonsubsistence Areas based upon the range of the Fortymile caribou herd. Range of where a caribou herd migrates is not one of the 12 factors to be considered in determining Nonsubsistence areas. Some areas where this caribou herd ranges in Unit 20 are in areas that are not in the Fairbanks Nonsubsistence Use Area, and a decision might be needed on those areas, however, the Board must consider the 12 factors and the “preponderance of evidence” provided, and this “preponderance of evidence” should provide sufficient evidence to oppose this proposal. This proposal could set a precedent, which would not be a good pattern to be in place.



Submitted By Patrick Homes

Affiliation Kodiak Rural Subsist. Roundtable

To: The Alaska State Joint Boards of Fish and Game

I would request that the Joint Board of Fish and Game deny proposition 40, to make Kodiak a non -subsistence area. Since Statehood the Alaska Board of Fish and Game (later separate Boards) has seldom passed proposals submitted by one person that changes or creates resource allocations for large numbers of folks in other regions of the state. Proposal 40 is such a proposal. It does not even define what area of Kodiak would be included. There have been not significant changes in any of the existing State C&T criteria that would warrant a change in Kodiak's subsistence status.

The State Subsistence Division technical report 386, by James Fall ADF&G clearly documents that Kodiak is indeed a subsistence community as do all of the past C& T determination. The Multi- year Federal "Rural Determination process" completed in 2007, reaffirmed for a second 2nd time that Kodiak was a rural community deeply involved in subsistence.

The Community of Kodiak has:

- **Abundant natural resources** thanks to the excellent management of ADF&G and Research and Habitat studies of FWS. We are the 2nd port in the State for volume of fisheries resources. **We solve our subsistence and resource allocation problems locally.** When there have been short term fluctuations in abundance, the Kodiak F&G& AC and K/ARAC (Fed. Subst. Council) assisted by the local management staff of ADF&G & F&WS have jointly resolved these problems and allocation issues before approaching the State or Federal Boards. The Kodiak Regional Aquaculture Ass also assists in restoring, enhancing, or establishing subsistence salmon runs for subsistence purposes.. This home based problem solving has been lauded in Universities as the "*Kodiak Model.*"
- **A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stocks or game population**, established by our rich multi-ethnic culture, over multiple generations, and thousands of years, **without endangering subsistence resources.**
 1. It has existed continuously as a subsistence community for 7-8000 years.
 2. We were the 1st European community in Alaska, (circa late 1700's).
 3. It survived the radical cultural changes of WWII.
 4. A rich multi-ethnic composed of folks of many backgrounds who have joined our of Alutiiq, Unagan, Yupik, Inupiat, Den'ai, Tlingit, and Hiada indigenous population. Our population has grown with the migration of Russians, Scandinavians and other Europeans, retired military and stateside folks. Over the last 40 years Philippino, Hispanic, Pacific Islanders, Asians have slowly joined our community. Learning from each other, nearly all the folks have embraced the subsistence lifestyle of Kodiak,
- **A subsistence culture that continues to flourish due to the incredible wealth and diversity of subsistence resources.**
- **A pattern of taking or use recurring in specific seasons of each year varying with changes in abundance and availability,**
- **An array of methods and means of harvest that are characterized by efficiency and economy of effort and cost.** Often multi-families share boats, nets, gear.
- **Local folks, (often times mutli-family) use and share means of handling to their harvest, preparing, preserving, and storing fish or game.** Some of these have been traditionally used by past generations, others include more modern methods of cryovacing and, freezing, or dehydrating..
- **A commitment to sharing subsistence harvest with elders and the needy, often by giving away a major share or majority of their harvest.** An unwritten community standard is "*no one should go hungry!*"
- **A noncommercial, long-term, and consistent pattern of taking, use, and reliance upon the fish stock and game exists.** These co-exists with a major commercial fisheries (2nd in state, 5th in the nation), local guide businesses, sport hunting and fishing opportunities.
- **A pattern of taking or use that includes the sharing (often between generations) knowledge of fishing or hunting skills, values, and lore.** This mentor ship transcends ethnic backgrounds and is a vested part of famillies, individuals, non-profit public service groups, tribes, native organisations and our schools.
- **A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.** An ADF&G subsistence study showed that 94% of the Kodiak road system users shared natural resources. (incl. USCG Station). This was one of the highest rates reported in the state(ADF&G Subsistence Division research study,a few years back).
- **A pattern that includes taking, use, and reliance for subsistence purposes upon a wide variety of fish and game resources that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.** Research tabulated by NOAA Biologist, Dr. Robert Otto in 2006, (Kodiak Rural Round Table discussions during the Fed. Rural Determination, unpublished); showed that Kodiak utilized more species then most subsistence communities in Alaska. (I believe 159?).

Please oppose proposal 40.

Sincerely,

Patrick B. Holmes

A retired biologist with > 22yrs.participation in the Kodiak F&GAC.and K/ARAC (Fed. Subst. Council). A Kodiak Resident for most of my life.



Submitted By Thor Stacey
Affiliation Alaska Professional Hunters Association
Phone 9077231494
Email thorstacey@gmail.com
Address PO Box 240971
Anchorage, Alaska 99524

ALASKA

PROFESSIONAL HUNTER ASSOCIATION, INC.

P.O. Box 240971, Anchorage, AK 99524

Phone: (907) 929-0619 ~ (907)-868-1562

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

September 23, 2013

Alaska Department of Fish and Game

Boards Support Section

PO Box 115526

Juneau, Alaska 99811-5526

Fall 2013 joint Board of Game & Fish Written Comments

Dear Alaska Board of Game & Fish Members,

Please find the following comments regarding proposals you will be considering during the October 2013 joint board meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) is concerned by, and opposed to, attempts to repeal "non-subsistence" areas statewide. The APHA also has serious concerns about what appear to be philosophically driven attempts to redefine what is and what is not subsistence harvest and how "*amounts necessary for subsistence*" (ANS) findings are accomplished in the future. APHA members are almost wholly long-term Alaskan residents with deep community ties across our great State. Alaska's professional guide industry represents a significant and important economy in rural Alaska. The health of this industry is dependent upon prudent stewardship and conservation of Alaska's wildlife as well as fair allocation. Alaska's professional hunters ask that when you carefully consider the below comments you keep in mind that our interest is to have abundant game as well as a healthy, inclusive social situation that is in the best interests of ALL Alaskan's.

Individual Proposal Comment

Proposal #35- **OPPOSE**

We oppose this proposal because its factual premise is false. Subsistence hunting and fishing are defined in AS16.05.940.(31-32) and these uses are limited to **Alaska Residents**. Therefore the assertion that; "*The boards may remain confused as to which group of users they were to restrict harvest opportunity to*" is also false. We are not aware of any instances where non-residents have been considered subsistence users by either the BOG or BOF and we are certain that this would be impossible and a violation of statute if it were to happen. We agree with the Department's staff comments on this proposal.

Proposal #38- **OPPOSE**

We oppose this proposal because we don't believe that the cities of Anchorage-Matsu-Kenai, Fairbanks, Juneau, Ketchikan or Valdez have all suddenly become "communit(ies) where dependence upon subsistence is (a) principal characteristic of the economy, culture, (or) a way of life." The APHA's comments on *Proposal 38* are confined to how this proposal will affect commercial game use and allocation.

According to the Departments' staff comments, the proposed area's socioeconomics were re-evaluated in 2007 and there was no significant evidence to support any boundary changes. This is a proposal that, if passed, will have a significant and negative effect on non-resident allocation for the following reasons:

- ANS findings will have to be made directly adjacent to Alaska's largest urban centers



- Sport and commercial harvests of fish and game will be severely restricted or eliminated to allow and provide for t
- Loss of all non-resident moose hunting within re-defined non-subsistence boundaries
- Established and sustainable guide businesses will cease to exist in areas where guiding has been a vocation and lifestyle since territorial days
- The loss of ungulate harvest will severely disincentive guides (guides are an important component in the predator harvest equation) from utilizing "predator control units" and providing hunts for predators, causing a net debit to the area's ungulate numbers thus a net loss for the region's residents opportunity to harvest game

There is no reason to approve *proposal 38* and the "problem" it solves is philosophically based. We believe that these types of philosophically driven disputes over allocation are beyond this forum because they involve ALL Alaska's prioritization of resource use and valuation. Alaska's guide industry will remain vigorously opposed to this proposal as long as the communities in question remain unquestionably urban with populations that are largely disconnected and non-reliant on Alaska's fish and game.

Summary

The APHA's comments on *proposals #35&38* are an effort to confine our interest to proposals that direct will have impacts on the Professional Guiding Industry. However, the APHA is opposed to ALL the proposals that seek to change *non-subsistence* area boundaries without supporting socioeconomic evidence to support the requests. We are further opposed to all the proposed efforts to change how *ANS* is calculated because we feel the current system, while not perfect, is working. We feel compromises to encourage a healthy, inclusive, social climate that surrounds game management is especially important at this point in our State's history. Keeping this goal in mind, we urge caution when there are any proposed attempts to drastically or radically alter the basic model of State subsistence management. It seems as if each misstep made by State managers leads to increased Federal control over our fish and game. Alaska's regulatory autonomy and control over its fish and game resources should always be a priority of its policy makers. Whether we like it or not there are Federally recognized rural subsistence priorities. We do not believe it is in Alaska's best interest to encourage rural residents to seek Federal favoritism in game allocation or management as recourse from loss of access to fish or game (real or perceived) or failure to meet realistic *ANS*.



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



PC06
1 of 2



FWS/OSM 13076.GP

SEP 25 2013

Mr. Karl Johnstone, Chair
Alaska Board of Fisheries
Mr. Ted Spraker, Chair
Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairmen:

The Alaska Joint Board of Fisheries and Game will consider 41 fish and wildlife proposals, among other issues, at its meeting beginning October 12, 2013.

The U.S. Fish and Wildlife Service, Office of Subsistence Management (OSM), in conjunction with four other Federal agencies, has reviewed these requests and believes that adoption of any of these requests will not have a significant impact on Federal subsistence users, fisheries, or wildlife.

The Federal Subsistence Board is currently reviewing its Rural Determination process and is seeking public comment until November 1, 2013. Written materials describing the Federal Rural Determination process review will be provided at your meeting. These materials are also available online at the following U.S. Department of Interior website:
<http://www.doi.gov/subsistence/library/policies/rural-determination.cfm>

The Federal Subsistence Board will also be holding a Public Hearing on the Rural Determination Process on October 15, 2013, from 1:30 p.m. – 3:30 p.m., at the Federal Annex Building, 222 West 8th Avenue, Anchorage, Alaska, 99513. Identification is required. A presentation on the process will be followed by an opportunity to comment.



Chairmen

2

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Boards and the Alaska Department of Fish and Game on these issues.

Sincerely,

Eugene R. Peltola, Jr. (acting ARD)

Eugene R. Peltola, Jr.
Assistant Regional Director, OSM

CC: Cora Campbell, ADF&G
Tim Towarak, Chair FSB
Lisa Olson, ADF&G, Anchorage
Jeff Regnart, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Charles Swanton, ADF&G, Juneau

Kristy Tibbles, ADF&G, Juneau
Kathleen M. O'Reilly-Doyle, DARD, OSM
Drew Crawford, ADF&G, Anchorage
Jennifer Yuhás, ADF&G, Anchorage
Interagency Staff Committee
Administrative Record

**KAWERAK, INC.**

P.O. BOX 948


NOME, AK 99762

TEL: (907)443-5231

FAX: (907)443-4452

DATE: September 24, 2013

TO: Joint Board Comments
Board of Fish/Board of Game
Fax: 907-465-6094

FROM: Melanie Bahnke, President 
Kawerak, Inc.

Thank you for the opportunity to comment on proposals you will consider. Kawerak, Inc. is the regional tribal consortium authorized by tribal resolution to assist, promote and provide programs and services which improve the social, economic, educational, cultural and governmental self-sufficiency of the Native peoples throughout the Bering Strait/Norton Sound region. The Kawerak board of directors is comprised of the presidents of the 20 federally recognized tribes in the Norton Sound/Bering Strait region, two elder representatives and the chair of the Norton Sound Health Corporation.

Kawerak is providing public comment on five proposals. They are proposals 33, 34, 35, 40 and 41. Kawerak opposes all of these proposals because they create a burden on subsistence users and erode subsistence rights. We feel that adding additional regulations to subsistence is unnecessary and will not result in improved management for subsistence hunters and fisherman.

Kawerak opposes Proposal 33 which would ask subsistence hunters and fisherman to report all game or fish caught within 30 days of harvest. This would create an unreasonable burden on subsistence users and would not be compatible with customary and traditional methods and uses. The proposal does not take into account our activity when we are hunting and fishing. There are several reasons why reporting would not be accurate. For example, our young people participate in hunting and fishing and their catch may not go directly to their home but rather to family, elders, and friends. Additionally, our subsistence hunting and fishing practices are very dynamic and can include camping for days, weeks or months for the main purpose of gathering foods for the winter. We object to proposal 33.

Kawerak opposes Proposal 34 because it would decrease the amount of information that the boards are allowed to use for decision-making and it would potentially increase the amount of harvest reporting requirements of subsistence users as well as the frequency of implementing

40 YEARS OF SERVICE TO THE VILLAGES OF:

BREVIK MISSION • COUNCIL • DIOMEDE • ELIM • GAMBELL • GOLOVIN • KING ISLAND • KOYUK • MARY'S IGLOO • NOME • SAVOONGA
SHAKTOOLIK • SHISHMAREF • SOLOMON • STEBBINS • ST. MICHAEL • TELLER • UNALAKLEET • WALES • WHITE MOUNTAIN



Tier II resource management. Tier II resource management is a hardship for rural areas, as it can limit access to subsistence resources in times of shortage. The subsistence hunters and fishers monitor and limit their own resource use according to cultural traditions and implementing further State monitoring requirements and harvest restrictions will be a hardship.

Kawerak opposes Proposal 35 because it would change subsistence law by defining all users as subsistence users. Rural residents have a difficult time with access to game or fish in times of shortage under the current Alaska subsistence law. The Federal Subsistence Board established a rural priority because they know how greatly rural residents historically and currently rely on nature for food throughout the year. Any additional changes that would dilute subsistence opportunity will not be supported by the Native community of Alaska.

Kawerak opposes Proposals 40 and 41 which would create non-subsistence areas in Bethel and Kodiak. In both of those communities many Native hunters and fisherman live subsistence lifestyles. It's inconceivable to the Native community that living in a rural hub changes you from a subsistence hunter and fisher to a non-subsistence hunter and fisher. We are against changing these communities to non-subsistence areas because the Native people residing there depend on subsistence resources that are accessible from the communities they live in.

In regards to Proposals 36 and 37 Kawerak is still in the process of evaluating these proposals and the effect they would have on the subsistence users and their rights. We will provide comments in person at the joint board meeting. Thank you for the opportunity to provide comments.



LAW OFFICE OF KNEELAND TAYLOR, P.C.

425 "G" Street, Suite 610
Anchorage, AK 99501
907-276-6219 telephone
907-258-7329 FAX
e-mail: kneelandt@alaska.com

September 24, 2013

Attn: Joint Board Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5525
FAX: 907-465-6094

Dear Members of the Boards of Game and Fish:

I am a non-consumptive user of Alaska's wildlife. I do not hunt any longer, and I can't recall fishing for at least 5 years. I arrived here almost 40 years ago, and for forty years I have had the privilege of spending a great deal of time hiking, skiing, kayaking, and enjoying Alaska's wild places.

I support the adoption of Proposal 12.

I have attempted to participate in the public process regarding wildlife since 1998. I have a good grasp of wildlife management issues in Alaska, but I have no background or experience regarding the management of Alaska's fish.

I have on several occasions sought election to the Anchorage Advisory Committee, without success. The first time was in 1999. I contacted a number of my friends and supporters in a failed effort to elect at least one or two people to the Anchorage Advisory Committee. We turned out about 33 people, but word got out, and about 80 hunters showed up. Before that time, elections were not as well attended. As a practical matter, voting was by slates, with two slates running against each other. We ran 5 candidates, the hunters ran 6. The rules provide that the majority takes all. We lost, and not a single one of our people were elected.

It was in 2000, I believe, that we tried again. Same process. Two slates of candidates. Majority take all. Not a single one of our group was elected.



Attn: Joint Board Comments
Alaska Department of Fish and Game
September 24, 2013
Page 2 of 4

Two of "our side" were elected in 2008. That election meeting was sparsely attended, and Wade Willis was able to quietly get enough of "our side" to show up without the other side learning of his plan. Because secrecy was maintained, Wade Willis and Mike McCrary were elected. Both are hunters, incidentally, but on "our side".

Encouraged by the previous year's success, Wade tried again. That was in 2009, I believe. But word got out, and on the day before, and the day of the election, both sides resorted to mass e-mail solicitations, and talk radio, in the effort to turn out voters. On election day we turned out about 135 of our people, while the hunters turned out about 400.

Wade had put together a good slate of candidates. Several of our slate were hunters, and one of Wade's candidates was not only a hunter, born in Alaska, but had extensive experience as a military officer managing game. Another two of Wade's candidates had experience working [full time] for large non-profit environmental organizations.

The slate of the other side was vastly less qualified. I don't know how it was selected, but I believe the other slate was selected by the leaders of a Tea Party group known as "Conservatives in Action". As a practical matter, as it turned out, those leaders decided membership of the Anchorage Advisory Committee.

The election was held in a meeting room in an Anchorage School District administrative building in East Anchorage. The registration line extended out into the parking lot. Many people stood on line for over an hour to register. Many voted after registering, but without actually attending the meeting. Quite a few of the Tea Party's ticket supporters drove in from Wasilla.

The meeting started late. Short statements were made by the candidates. A large number of voters left before learning anything about the candidates. Voting was by slate, as a practical matter, as usual in contested elections. Majority take all. The Tea Party slate won. Not a single person on our slate was elected.

We haven't tried again. But we might.



Attn: Joint Board Comments
Alaska Department of Fish and Game
September 24, 2013
Page 3 of 4

I have provided that brief history to point out that the process is not working in Anchorage. It may work elsewhere, but not here. This is a city of almost 300,000 people and it may be that our relatively large population makes manipulation of elections easier than elsewhere. When our side publicly tries to elect one or more people, the hunters learn of our intentions, organize, and flood the election meeting with enough people to swamp us. Our side just doesn't have as many people who are as highly motivated.

Part of the problem we have is that we know that the advisory committee is essentially powerless. That knowledge also inhibits our ability to attract well-qualified candidates. Another part of the problem is that our people have many other interests, and are not as focused on wildlife issues as are hunters, and commercial guides.

I have not addressed disputes over fishing in this letter. That is because these election battles aren't about fishing. They concern wolves, moose, bears, wolverine, and other wildlife. Perhaps that is good for management of Alaska's fish. Perhaps not. But it is worth considering in your deliberations the question of whether there should be two advisory committees for Anchorage: one for fish, and one for wildlife.

Proposal 12 is by the Alaska Wildlife Alliance. The proposal suggests that elections be only advisory, and that members of advisory committees be appointed by the Commissioner. That is one way to fix the problem. There are other ways of providing for diversity of opinion and experience. One is to have cumulative voting at elections. Most of Alaska's Native Corporations use cumulative voting, and it seems to work. Another method would be to have designated seats, with non-consumptive seats reserved for genuine non-consumptive users. There could be other designations: scientists, hunters [of course], commercial fishers, recreational fishers, etc. Personally, I support cumulative voting.

Finally, I note that I personally am focusing only on Anchorage. This is the city where I live, and it is the Anchorage Advisory Committee with which I have personal experience.



Attn: Joint Board Comments
Alaska Department of Fish and Game
September 24, 2013
Page 4 of 4

Thank you for considering my comments. I hope you will do something to change things.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kneeland Taylor".

Kneeland Taylor



SUN'AQ TRIBE OF KODIAK



Federally Recognized December, 2000

Ceremonial Bent Wood Hat

Fax

TO: Joint Boards, Dept of Fish and Game

TELEPHONE/FAX: 1-907-465-6094

FROM: Robert Polasky @ Sun'aq Tribe of Kodiak

TELEPHONE/FAX: 907-486-4449/907-486-3361

PAGES:

RE:

Opposition to Proposal 40-5

Robert Polasky

SUN'AQ TRIBE OF KODIAK
312 West Marine Way
Kodiak, Alaska 99615
907-486-4449
ceo@sunaq.org

312 W. Marine Way, Kodiak, Alaska 99615 (907) 486-4449

Fax: (907) 486-3361 * E-mail: stk_assistant@ak.net

Proudly representing the members of the Sun'aq Tribe of Kodiak Island, Alaska



Sun'aq Tribe of Kodiak

Federally Recognized December, 2000

Attention: Joint Board Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526-5526
Juneau, Alaska 99811-5526
FAX: 907-465-6094

September 20, 2013

To Whom It May Concern:

The Sun'aq Tribe of Kodiak with 1650 Alaska Native Tribal members is **Opposed to "PROPOSAL 40-5 AAC 99.015. Joint Board nonsubsistence areas."** The claim being made by this proposal is with unsubstantiated data in relation to the Kodiak area and should not be supported or even considered by the State of Alaska Joint Board of Fisheries and Game. The community of Kodiak does not qualify as a "Non-subsistence area" and is considered "Rural" as determined by the Federal Subsistence Board. Therefore, Kodiak is a subsistence area.

The Sug'piaq Alaska Native people of the Sun'aq Tribe of Kodiak have documented Customary and Traditional Practices through Traditional Ecological Knowledge documentation gathered in an Administration for Native American Environmental Capacity Building Grant. This information of natural Alaska Native food items, "Subsistence", from the air, sea and land are currently being used and have been used for thousands of years. This confidential Tribal document has obtained culturally important customary and traditional information that has been passed on through oral tradition, which is still a practice of today and for the future.

If you are interested in communication or consultation about this subject please contact us at your earliest convenience.

Sincerely,

A handwritten signature in black ink that reads "Robert Polasky".

Robert Polasky

CEO Sun'aq Tribe of Kodiak

312 West Marine Way, Kodiak, Alaska 99615
Phone: 907-486-4449 Fax: 907-486-3361 Email: ceo@sunaq.org
Proudly representing the members of the Sun'aq Tribe of Kodiak, Island, Alaska



**GATES OF THE ARCTIC NATIONAL PARK
SUBSISTENCE RESOURCE COMMISSION
4175 Geist Road
Fairbanks, AK. 99709
(907) 455-0639 or FAX (907) 455-0601**

April 18, 2013

ATTN: Joint Board Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526
Fax: 907.465.6094

Dear Board of Game members,

At our most recent meeting of the Gates of the Arctic National Park and Preserve Subsistence Resource Commission on April 9 & 10, 2013 in Ambler, Alaska, the commission took the following positions regarding Subsistence Uses and Procedures proposals:

Proposal 33: 5 AAC Chapter 99. Subsistence Uses

SRC Vote: Oppose

Justification: Five year averages do not reflect long term customary and traditional uses of resources. Five years is not reflective of the fluctuating fish and wildlife populations within Northern and Interior areas of Alaska. This proposal does not meet the amounts necessary for subsistence criteria.

Proposal 34: 5 AAC 99.010. Boards of Fisheries and Game Subsistence Procedures

SRC Vote: Oppose

Justification: This proposal will put an excessive burden on the subsistence user to report. This proposal is requiring harvest reporting within 30 days and a lot of subsistence fisheries have no harvest reporting and instead house-to-house surveys are done for some communities. Additionally, a lot of the surveys are not written in the local language of many of the communities. This is another method to reduce the amount necessary for subsistence and in addition, the subsistence user can be penalized for not submitting a report.

Proposal 35: Boards of Fisheries and Game Subsistence Procedures

SRC Vote: Oppose

Justification: The non-subsistence areas like Fairbanks and Anchorage have no subsistence priority. The Board of Game could make the non-subsistence areas smaller or bigger, but they can't designate user groups in a non-subsistence area. Basically, a person from Georgia or New York has equitable right to hunt a moose around Anchorage or Fairbanks with Alaska residency. Therefore the Alaska statute would have to be changed, not the regulation.



Proposal 36: 5 AAC 09.010. Boards of Fisheries and Game Subsistence Procedures

SRC Vote: Oppose

Justification: This proposal would do away with rural preference.

Proposal 37: 5 AAC 09.010. Boards of Fisheries and Game Subsistence Procedures

SRC Vote: Oppose

Justification: This proposal could actually begin to restrict customary and traditional bartering/trading. Subsistence users are not bartering in order to make large amounts of money, they are bartering to sustain the subsistence way of life in the times that we are at and help offset the costs of hunting and fishing. Additionally, it will be difficult to establish a value system of the worth of certain amounts of meat and fish.

The Gates of the Arctic NP Subsistence Resource Commission is requesting that our proposal votes are submitted as record copies (RCs).

Sincerely,

Pollock Simon Sr., Gates of the Arctic NP SRC Chair

Jack Reakoff, Gates of the Arctic NP SRC Vice-Chair



Cordova District Fishermen United
PO Box 539 | 500 First Street | Cordova, AK 99574
phone: (907) 424-3430 | fax: (907) 424-3431
web: www.cdfu.org | email: cdfu@afu.net

Fax

ATTN: Board Support

Fax: 907. 465-6094

From: Alexis Cooper

Date: 9.25.2013

Subject: BOF Worksession
& JOINT BOARDS COMMENTS

Pages: 2 + Cover

To whom it may concern:

Please find the attached comments. Board Gen Props.
is directed toward the Joint meeting and is a
re-submission of earlier comments.

Second is in regard to ACR 6 and directed to the
BOF Worksession

Thank you
Alexis



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone: (907) 424 3447 | fax: (907) 424 3430
web: www.cdfu.org | email: cdfu@ak.net

September 24, 2013

Chairman Karl Johnstone
Alaska Board of Fisheries
Board Support Section PO Box 115526
Juneau, AK 99811

RE: ACR 6 Establish a statewide regulation to allow use of dip net gear in place of commercial gillnet and seine gear for salmon stock conservation purposes.

Dear Chairman Johnstone and Board of Fisheries Members,

Cordova District Fishermen United (CDFU), as one of the longest standing fishermen's organizations in the State, represents over 500 fishers and their families in the Copper River. As always, we appreciate the opportunity to submit comment for consideration by Board Members.

CDFU *opposes* the statewide application of substitute gear as proposed in ACR 6.

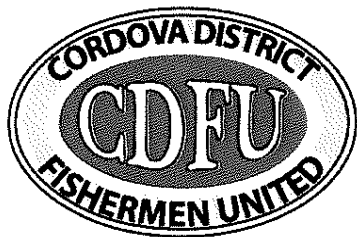
We believe the suggested use of dip net gear does not practically apply in the open-ocean Copper River commercial fishery district, is not necessary for conservation purposes in our region and ultimately would not meet the goals as intended by the author with statewide application.

With the uncertainty of Chinook returns to systems around the state, we can appreciate the author's intent, however this one size fits all approach may not be the most practical for statewide implementation.

Thank you,

A handwritten signature in black ink, appearing to read 'Alexis Cooper'.

Alexis Cooper, Executive Director
Cordova District Fishermen United



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone (907) 424 3447 | fax (907) 424 3430
web www.cdfu.org | email cdfu@ak.net

March 14, 2013

Chairman Karl Johnstone
Alaska Board of Fisheries
Board Support Section PO Box 115526
Juneau, AK 99811

RE: Criteria for Board Generated Proposals

Dear Chairman Johnstone and Board of Fisheries Members,

Cordova District Fishermen United (CDFU) thanks the Board for soliciting public comment on the criteria for Board generated proposals. CDFU supports the development of criteria for Board generated proposals and suggests that the board consider and take input on said criteria for a full board cycle before adopting final policy.

Regarding the draft criteria, CDFU recommends striking "allocation concerns" from the list of examples of "in the public's best interest. We believe that allocated proposals are always inherently in one group's best interest at the expense of another group's best interest, and should not be generated by the board or taken up out of cycle in the absence of new information found by the board to be compelling.

Additionally, CDFU recommends the adoption of a policy that Board generated proposals shall not be generated from an Agenda Change Request proposal that has been denied or has not been acted upon. It seems logical that if a proposal fails to meet the criteria for an Agenda Change Request, it simply should not be taken up out of cycle.

CDFU, as one of the longest standing fishermen's organizations in the State, represents over 800 fishers and their families in the Prince William Sound region. As always, we appreciate the opportunity to comment and look forward participating in the further development of the criteria for Board Generated Proposals.

Sincerely,

Curt Herschleb Vice President,
Cordova District Fishermen United



^{Fax} 442-2420

State of Alaska

Dept of Fish & Game

I oppose Proposal 33 where
the state is trying to ~~to~~
change the subsistence bag
limit.

As a concerned citizen I oppose
anything that will affect our
subsistence.

Thank you

Janet Mills
Janet Mills

Box 58
Natchez Hill
485-2006