

RC 034



**Southeast Alaska
Subsistence Regional
Advisory Council**

**Bertrand Adams Sr., Chairman
P. O. Box 349
Yakutat, Alaska 99689**

RAC SE14042.RL

01 DEC 2014

Karl Johnstone, Chairman
Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Johnstone:

During the Southeast Alaska Subsistence Regional Advisory Council (Council) meeting in Wrangell on October 21-23, 2014, the Council adopted the following comments on State of Alaska Board of Fisheries Southeast and Yakutat Finfish Proposals.

PROPOSAL 148 - Allow for designation of community subsistence harvesters for Hoonah residents, within the adjacent subsistence use area; described in 5AAC 01.716(a)(4).

Current Federal regulations: Federally qualified subsistence users may designate another qualified subsistence user to harvest fish.

Council Position/Recommended Action: **Support with modification to include all species of salmon and commercial fishing gear.**

Rationale:

- provides increased subsistence opportunity for residents of Hoonah
- provides an opportunity for residents without boats to harvest subsistence fish
- no adverse effect to Federally qualified subsistence users

PROPOSAL 149 - Modify the weekly subsistence salmon fishing schedule for Klawock Inlet, Klawock River, and Klawock Lake, as follows: Change the days of the week in the Klawock River Subsistence Fishery to start at 8:00 a.m. Tuesday and continue until 5:00 p.m. Saturday.

Current Federal regulations: There is no weekly fishing schedule for the Federal subsistence fishery.

Council Position/Recommended Action: **Support.**

Rationale:

- provides increased opportunity for subsistence users

PROPOSAL 150 – Close the waters of Klawock River within the waters under Federal Subsistence Fisheries jurisdiction.

Current Federal regulations: The Southeast Alaska Subsistence Regional Advisory Council recommended the Federal Subsistence Board close this area to seines and gillnets in July and August.
Council Position/Recommended Action: **Take no action.**

Rationale:

- defer to Craig Fish and Game Advisory Committee to provide appropriate solution to this pressing conservation concern

PROPOSAL 151 - Close Klawock River to subsistence salmon fishing upstream of the Klawock River Bridge.

Current Federal regulations: The Southeast Alaska Subsistence Regional Advisory Council recommended the Federal Subsistence Board close this area to seines and gillnets in July and August.

Council Position/Recommended Action: **Support.**

Rationale:

- defer to the local Craig Fish and Game Advisory Committee to provide an appropriate solution to this pressing conservation concern
- restriction is necessary for conservation of sockeye salmon in the Klawock River
- the use of seine and gillnet gear in this area during July and August poses an unacceptable management risk

PROPOSAL 152 - Repeal the outboard motor horsepower restriction for Klawock River.

Current Federal regulations: There are no relevant Federal regulations.

Council Position/Recommended Action: **Support with the intent that commercial gear would be prohibited.**

Rationale:

- defer to the local Craig fish and Game Advisory Committee to provide an appropriate solution to this pressing conservation concern.
- increased opportunity for participation in this fishery by local residents

PROPOSAL 153 - Allow subsistence harvest of salmon with purse seine and gillnet gear in the customary and traditional use areas of Districts 12 and 13 near Angoon.

Current Federal regulations: There are no relevant Federal regulations.

Council Position/Recommended Action: **Support the proposal as modified by residents of Angoon.**

Rationale:

- defer to recommendations made by the local residents of Angoon
- increased opportunity and efficiencies in subsistence fishery by local residents
-

PROPOSAL 159-160 - Establish nonresident annual limits for coho, sockeye, chum, and pink salmon in salt and fresh waters of the Southeast Alaska Area at three times the daily bag limit.

Current Federal regulations: Federal subsistence fisheries generally have possession and annual limits.

Council Position/Recommended Action: **Support.**

Rationale:

- the lack of an annual nonresident limit has the potential of causing conservation concerns in some popular and readily accessible streams
- subsistence users have possession limits for all systems and annual limits for most streams
- it is a recognized principle of fisheries management to cap the number of fish a single person can harvest

In addition to the comments on these specific proposals, the Council acknowledges, values and supports recommendations for regulatory changes that consider traditional use areas and cultural patterns of use by local residents that provide for the continuation of subsistence uses.

Thank you. Any questions regarding this letter can be addressed directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, Alaska 99833, (907) 772-5930, robertlarson@fs.fed.us.

Gunalchéesh

Bertrand Adams, Sr.
Chair

Karl Johnstone, Chairman

4

cc: Beth Pendleton, Regional Forester, United States Forest Service
Eugene R. Peltola, Jr., Assistant Regional Director, Office of Subsistence Management
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management
George Pappas, State Liaison, Office of Subsistence Management
Carl Johnson, Council Coordination Division Chief, Office of Subsistence Management
Robert Larson, Council Coordinator, United States Forest Service
Jennifer Yuhas, Federal Subsistence Liaison Team Leader, Alaska Department of Fish & Game
Interagency Staff Committee
Administrative Record