

RC 9

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9 October 2013

Members of the Joint Board of Game and Fish

These are my personal comments to the proposal of concern.

Proposal 10. Do not support. I would appear the proposer interprets the terms "user" or "user groups" as something different than "consumptive users" or "consumptive user groups". When kept in context with all of Title 16 and Title 5 the terms use, user, uses, and user groups are always in context of consumptive. As far as special interests go, this proposal is asking for an advantage to their special interest? Being in the minority is always a tough spot to lead from, as I know from personal experiences.

Proposal 12. Do not support. Again I would refer that the proposer has miss interpreted of what a "user" is, in contexts of what is trying to be accomplished though the BOG and BOF process. I would also point out there is no language in codified of a "sport trapper" and the only language found pertaining to "sport hunting" is found in AS 16.05.255(10). There is no license for "sport hunting" or any regulations found.

Proposal 28&29. Support. Both these proposer are only asking to have some AC participation at the table during deliberations and act in the same role as the Department. To answer questions and explain facts. Since the Department has a new direction of being as neutral as possible an AC member or two at the table could be a befit to Broad members making best decision to proposals. While it would appear the Department is hanging their hat on the Statue for summiting only! The Statue is also the authority for 5AAC 96.050. Which also allows to "consult" with government agency (6) the BOG and BOF are an arm of the legislature. It would also appear that there is no language in Statue or regulation prohibiting such participation. I would hope that money would not be the factor in determining what Broad members would have for information provided to them while in deliberations. Lastly remember are a lot of very Knowledgeable AC members throughout the State. How many of you BOG and BOF members came from AC back grounds. Were you all just locale issue guys/gals?

Proposal 33&34. Support and amends could be used. Let me start out by asking, is having a reportable harvest report unreasonable in today's schemes of management? Department of Law has made the suggested to allow the individual Boards to address these proposals. I would note. That I would have

done that, but 5 AAC 99 is not a topic for proposals for statewide issues. It falls under Joint Boards authority. Whereas why it has been accepted for this meeting. For the AC's and public to adhere to the process of BOG and BOF I would feel the correct thing is not to change the process at a meeting. (By a loophole)

We can improve our best data available if all harvest was timely reported and that information was correct and accountable by the individual harvesting. Household Survey do not accomplish this. DOS would lead us to believe that this is some monumental task to accomplish. I would disagree. Based on most Big Game subsistence hunts are associated with harvest report and permit conditions to report timely. (Acceptation is the arctic region. For caribou but not moose). All subsistence fishing along roadside systems have a permit/harvest reporting. So well over 98% of all Big Game harvested under subsistence are reported by permit, Statewide. Raul or otherwise. It's not complicated nor have I seen the DWC raise the issue of cost. This is the "best data available" for harvest. We just need to catch up rural Alaska subsistence fishing.

The same Western Alaskan participating in a subsistence moose hunt is able to get a permit and comply. Yet now the Department is leading us to believe that same Alaskan will have an undue hardship and cost to participate in a subsistence fishery by permit?

5 years was used in proposal 33. Only because it's a starting place for discussion. 5 years has been used many times in management as it starts to show trend. Maybe 10 years of reportable harvest would be better.

An amendment could be made to these proposal that it would be the goal to have this fully implemented within 5 years or whatever would be effective and cost effective and educate the users of the change.

The Department of Law has made a statement in its comments on these proposals.

"The Boards also should keep in mind that they have no administrative, budgeting, or fiscal powers over the department, and cannot require the department to collect and compile harvest data for all fish stocks and game populations in any manner or on any particular time frame."

Really? Has the DOL not been present at BOG meeting dealing with the Predator control? Review the records please.

WE are just asking for a framework of consistence.

Proposal 39. Support. Maybe a better way of looking at this proposal would be to say. "Increase the area of the subsistence area for the Fortymile Caribou Herd".

The DOL somewhat is dancing around compliance with the Laws and regulations. Pertaining to the issue. Let me frank. The FCH has a winter hunt component. THIS IS A SUBSISTANCE OPPORTUNITY. Yet the BOG has adopted season, bag limit, and boundaries for that subsistence hunt inside the FNSA. Fortymile caribou are being harvested with in the FNSA under a winter subsistence permit.

This is out of compliance with AS 16.05.258 4(c) and 5 AAC 99.016 2(b).

Proposal 40 & 41. Support. I understand that I am in the minority here and is not a popular subject. Proposing such changes to the Kodiak and Bethel area, and their cities. But I felt that if a proposal was not submitted the department nor the Joint Broad wouldn't address any changes to possible changes to cities or communities statuses. There are none. Yet it is the responsible Joint Broads to do so. DOS also has duty to gather such data also. (Sitka should have been another of discussion)

Reading the report put out by the DOS for Kodiak has a lot of very old data to try to make logical assessments. Data from 93 – 2011, some are not dated.

I would suggest using the boundaries of the Kodiak Road System Management Area. I would make a note of record that the only Big Game with a positive finding of C&T is Deer. For Unit 8.

I would like to make the Joint Broad of some disturbing information found in "Subsistence Update 2010"

Under the heading. What is Subsistence Hunting and Fishing?

- "Sport fishing and sport hunting differ from subsistence in that, although food is one product, they are conducted primarily for recreational values, following principles of "fair chase."
 1. What is sport hunting?
 2. Are subsistence user exempt for "fair chase" laws?

- "While subsistence harvesting and processing are productive economic activities which are part of a normal routine of work in rural areas, sport fishing and sport hunting usually are scheduled as recreational breaks from a normal work routine".
 1. We have no sport hunting seasons to use as recreational breaks.
 2. Do you believe a large number of subsistence users don't schedule time off from their work routines to participate in that opportunity?

Who Participates in Subsistence Uses?

Most rural families in Alaska depend on subsistence fishing and hunting. A substantial proportion of rural household's harvest and use wild foods (Figure 2). For surveyed communities in different rural areas, from 92%–100% of sampled households used fish, 79%–92% used wildlife, 75%–98% harvested fish, and 48%–70% harvested wildlife. Because subsistence foods are widely shared, most residents of rural communities use subsistence foods during the course of the year

1. Has DOS forgot about Mc Dowell? Where are the findings for urban users participating in subsistence? They have been once again been completely ignored as someone who participates in subsistence and have needs.

How large is the Subsistence Harvest?

The subsistence and personal use food harvest by Alaska residents 500 (about 39.4 million pounds) represents about 1% of the fish and Game harvested annually in Alaska (Figure 4). This total represents All noncommercial harvests of wild food by residents of rural areas Plus subsistence and personal use fish harvests by residents of non subsistence areas. Commercial fisheries harvest about 98% of

Pounds per person 400 300 200 the statewide harvest (about 3.5 billion pounds annually), while sport fishing and hunting (general hunting and sport fishing) harvests by residents of Alaska non subsistence areas and all nonresident harvests) take 0.6% (21.3 million pounds)

1. One could wonder the logic of adding the number of pounds of fish caught by “urbanized” people in a person use fishery, a fishery not associated by subsistence opportunity?
2. Again why are only the harvest totals of subsistence from rural people? What about those who participate that resided in a non subsistence area but participate in a subsistence opportunity?
3. How many subsistence users live in non subsistence areas? How large is their subsistence harvest?
4. It is very clear it is the duties of DOS to compile that data by AS 16.05.094(1) Shall compile existing data and conduct studies to gather information, including data from subsistence user, on all aspects of the role of subsistence hunting and fishing in the lives of residents of the state.

You see there is no separation of data to be collected and compiled rural users from subsistence users that live in a non subsistence area. It’s all residents of the state participating in subsistence!

Thank you for your service members. Thank you staff for all your hard work.

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