

To: The Alaska State Joint Boards of Fish and Game

We request that the Joint Board of Fish and Game deny proposition 40, to make Kodiak a non -subsistence area.

The author's proposal lacks merit and fails to identify what area of Kodiak would be involved. There have been not significant changes in any of the existing State C&T's that would warrant a change in Kodiak's subsistence status. James Fall ADF&G, Subsistence Division report 386, describes the Kodiak road system as a subsistence community as do all of the past C& T determinations. The Federal Subst. Bd. Hearings in 06 for the 2nd time ruled the same area was a rural community deeply involved in subsistence.

Since Statehood the Alaska Board (s) of Fish and Game (later separate Boards) seldom has approved proposals submitted by one person that changes or creates resource allocations for large numbers of people in other regions of the state.

The Community of Kodiak has:

- Along-term consistent pattern of noncommercial taking, use, and reliance on the fish stocks or game population, used by a rich multi-ethnic culture, over multiple generations, not jeopardizing local subsistence resources.
 - 1) It has existed continuously as a subsistence community for 7-8000 years
 - 2) It was the 1st European community in Alaska, (circa late 1700's).
 - 3) It survived the radical cultural changes of WWII.
 - 4) It has grown slowly over the last 30+ years
 - 5) Many ethnic backgrounds who have joined our Alutiiq, & Unagan, indigenous population over time. 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 greater diversity than many parts of the State.) (Dr. Robert Otto NMFS, Biologist, in 2006, (Kodiak Rural Round Table discussions during the Fed. Rural Determination, unpublished);
- 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 or individual fish and hunt for elders, folks who need help.
- Local folks, (often multi-family) use and share means of handling to their harvest, preparing, preserving, and storing fish or game. Some use traditional means of past generations; others include more modern methods of cryo-vacing 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-exist with a major commercial fisheries (2nd in state, 5th in the nation), local guide businesses, and sport hunting/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 vested part of individual's, tribes, native organizations, non-profit public service groups, religious entities 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. ADF&G subsistence studies showed that 94%

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of the Kodiak road system users shared natural resources. (incl. USCG Station). This was one of the highest rates reported in a State.

- 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.

Sincerely,
Paul Chernavak

Chair
Kodiak F&G AC