



Bethel Native Corporation

Subsidiary Companies
Bethel Services Inc.
Bethel Solutions Inc.
Bethel Builders LLC
Bethel Contracting LLC
Bethel Engineering and Consulting LLC
Bethel Environmental Solutions LLC
Bethel Federal Services LLC

October 9, 2013

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


Dear Ms. Tibbles,

On behalf of its 1,800 shareholders, Bethel Native Corporation would like to provide public comment on proposals 6, 28, 29, 33, 34, 35, 36, 38, 39, 40 and 41.

Bethel Native Corporation supports proposal 6, to "Establish an Advisory Committee for Bethel." Bethel Native Corporation opposes proposals 28 and 29 to "Incorporate Advisory Committee Participation into Board Deliberations." A public process exists to gather information from the Advisory Committees and adopting these two proposals would disadvantage remote and rural advisory committee members greatly. Bethel Native Corporation opposes proposals 33 and 34 to "Modify the process for determining Amount Necessary for Subsistence." Alaska Statutes require the State Boards of Fish and Game to establish an Amount Necessary for Subsistence, these proposals aim to transfer that responsibility to the individual subsistence user. If the State wanted the subsistence user to assume that duty, then additional management authority and resource allocation must accompany that shift by establishing and funding of an inter-tribal fish commission, for example. Assuming the State of Alaska would like to maintain the existing management structure, these proposals and others aimed at minimizing subsistence access should be opposed including proposals, 35 and 36 both related to subsistence uses and procedures.

Bethel Native Corporation opposes proposal 38 to "Repeal the State Nonsubsistence Areas" and proposal 39 to "Reduce the size of Fairbanks Nonsubsistence Area." These proposals are in conflict with the State subsistence regulations requiring the Joint Board to establish the boundaries of nonsubsistence areas. Additionally, Bethel Native Corporation opposes proposals 40 and 41 to "Create Kodiak and Bethel Nonsubsistence Areas." Kodiak and Bethel very clearly continue to maintain the community characteristics associated with the subsistence area designation as defined by Alaska Statutes. These proposals are an attempt to undermine subsistence protections. The proposals are nonproductive and have no basis for consideration.

Thank you kindly for your time and service.



Ana Hoffman, President/CEO