

Board of Fish Comments

I'm Chariton Epchook, representing Kwethluk Incorporated Board of Directors. I have attached 1. Kwethluk Joint Group Resolution 16-01-01 and 2. Kwethluk Incorporated comments.

The Kwethluk Incorporated Board of Directors met and discussed BOF proposals 92 to 99 including the Board generated proposal 222 and on a later date with the Kwethluk Joint Group which is composed of: Organized Village of Kwethluk, Kwethluk Indian Reorganization Act Council (Tribe), City of Kwethluk, Kwethluk City Council (Municipality) and Kwethluk Incorporated Board of Directors (Village Corporation). We are currently in opposition of all these proposals, especially the two proposals that would pave the way to the end of our subsistence way of life by establishing a permit system that we have never used and do not desire to use in the future along with the proposal that would require a house hold to only have one (1) four (4) inch set net. Our people have never owned only one set net in a certain size and if this proposal is passed, what will be next on limiting our choice of set nets in order for us to store and preserve salmon or small fish. It's like those BOG proposals that puts a limit on a caliber size to hunt caribou, moose and bear (black and brown).

Thank you!

Attachments: Kwethluk Joint Group Resolution 16-01-01
Kwethluk Inc. Comments

Kwethluk Joint Group
Kwethluk Indian Reorganization Act Council
Kwethluk City Council
Board of Directors of Kwethluk, Incorporated

RESOLUTION NO.: 16-01-01

WHEREAS, the Kwethluk Joint Group is comprised of the Organized Village of Kwethluk Kwethluk Indian Reorganization Act Council, Kwethluk Incorporated Board of Directors, and the City of Kwethluk, Kwethluk City Council and

WHEREAS, The Kwethluk Joint Group met and discussed Board of Fish Proposal numbers 92 – 104, and;

NOW THEREFORE BE IT RESOLVED, that the Kwethluk Joint Group opposes Board of Fish Proposals 92 – 99 and the Board generated proposal 222 and are in favor of Proposals 100 – 104.

Certification:

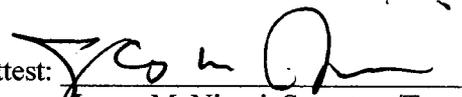
Passed and adopted this 6th day of January, 2016 where each Kwethluk Joint Group members had a quorum present and voted throughout.

Organized Village of Kwethluk

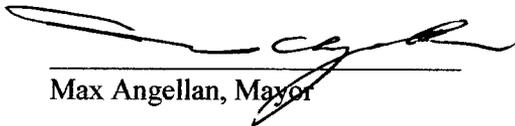


Tanya Epchook, President

City Council

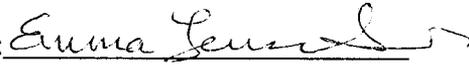
Attest: 

James M. Nicori, Secretary/Treasurer,

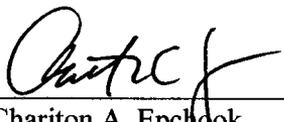


Max Angellan, Mayor

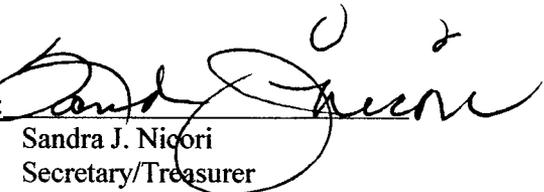
Kwethluk, Incorporated

Attest: 

Emma Turrentine, Secretary



Chariton A. Epchook
Chairman,

Attest: 

Sandra J. Nicori
Secretary/Treasurer

Comments for the Board of Fisheries from Kwethluk, Incorporated and shareholders

Proposals 93 and 95 – against

Proposal 95 and the alternative solution in Proposal 93 make it possible to establish a Tier II fishery for Chinook salmon in the Kuskokwim River. A majority of people living in the River qualify in having a “customary dependence” of the Chinook, “proximity to the stock or population” and “availability of alternative resources.” What would be difficult is to determine who would get a Tier II permit, especially if it is given in limited numbers, when all those applying are eligible to get one. This means that it is possible for a family or extended families who work together, that have gathered the Chinook for many years, NOT to get a Tier II permit. And this will not be fair and equal. It is more likely to bring about resentment and division among the people and ADF&G, “illegal” fishing out of desperation and general discontent to the Kuskokwim River, similar to what happened in 2013.

Kwethluk, Incorporated and its shareholders are against these two proposals.

Proposal 94 - against

The number of the inriver goal in this proposal is unreasonably high because of the recent lower returns of the Chinook to the Kuskokwim. We would probably get close to that number when there is absolutely no drift net and set net fishing for any kind of fish from the latter part of May to the first half of July for the lower half of the Kuskokwim River, and the whole months of the June and July for the middle and upper half of the River. This would effectively wipe out all subsistence activities on any type of fish for the entire River in this time period.

The Bethel Test Fishery does not and never has had the means to accurately count all the Chinook going upriver. At best, they attempt to make a good guess using test fishing. Historically, over 1/2 to over 3/4 of the Chinook are already upriver from Bethel by the 25th of June on any given year. The residents and experienced subsistence fishers of the Lower Kuskokwim would say the same thing.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 96 - against

Because of the difference in population in the lower and upper Kuskokwim areas, separating the amount of subsistence caught Chinook into three areas as proposed will not be fair and equal.

According to the 2010 Census, the combined total of people representing the middle and upper Kuskokwim from Lower Kalskag to the headwaters of the Kuskokwim is 1,900. From Tuluksak to the mouth of the Kuskokwim (including the Tundra villages and three coastal villages north of the mouth of the Kuskokwim), the combined total of people representing the lower part of the Kuskokwim is 12,305. Bethel alone has a population of over 6,000. In order to be fair and equal (if what this proposal is looking for), then we must look at active fish camps along the entire River who are, and have been, practicing customary and traditional use of the salmon. Because most of the people live in the lower part of the Kuskokwim (below the 2 Kalskags), we will find more fish camps there and they will always have allocations (if there are any to be given) more in number than the middle and upper Kuskokwim. If we want a fair and equal share of our salmon as a subsistence resource, then we must count all the fish camps within the River that have a real status of being customary and traditional, and equally disburse the allocated subsistence catch of Chinook.

Dividing the amounts necessary for subsistence uses in three areas as this proposal states will not work.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 97 – against

As it is stated, this proposal would make it possible for each and every household in the Kuskokwim River to get a Chinook subsistence permit. A household permit for each and every household in the Kuskokwim River will result in giving opportunity to individuals or families who have not customarily and traditionally harvested Chinook or other salmon stocks. In many cases in our villages, single or two member families do not have the means or equipment to harvest any salmon and have not done so. If this proposal passes, most of the 160 plus households in Kwethluk, if not all, will get a household permit. This will open the door for most households in Bethel to get a permit too, even if they have not customarily and traditionally harvested the Chinook and are not federally qualified users.

There is also a danger in making the permit a permanent fixture in subsistence activities even in years where there is not a concern for low Chinook numbers. This would unnecessarily put more work on State and Federal agencies that manage our resources.

Additionally, a household permit, as this proposal states, would only record the number of Chinook that have been taken and none of the other species of fish recorded. The present system of surveys the Alaska Department of Fish and Game does after the summer season is

still a viable and near-to-accurate means of recording subsistence catch of all fish species from May to September in the Kuskokwim River.

If we have to use a permit system for Chinook, and to be fair to those who are asking for customary and traditional use of our resources, then the only way for this to work would be to give permits to those families who have now, and have had, fish camps.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 222 – against

This proposal brings forth the idea of having a community and a personal household permit, and is open to any resident living in the Kuskokwim River, no matter how long they have lived in the area. There is no language to indicate whether one has had customary or traditional use of the Chinook and anyone can take a household permit to attempt to freeze or make canned Chinook even in times of conservation. There are other species of salmon that are caught in the Kuskokwim - chum, sockeye and silver - that can be frozen or canned in greater amounts and produce better yields.

During June of 2015, the USF&W enabled Kuskokwim communities to catch Chinook in allocated amounts. Although not all communities participated, those that did were given a taste of Chinook and relieved some of the craving for fresh salmon. Kwethluk took part in this and its residents were grateful for it.

Kwethluk, Incorporated and its shareholders are against this proposal as it is written.