Comments for the Board of Fisheries, March, 2017 meeting in Anchorage from Kwethluk, Incorporated and shareholders

Proposals 275 – against

Proposal 275 recommends establishing 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 and “proximity to the stock or population.” 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.

We have heard of a Tier II fishery in the Nome area and how most of the subsistence users were dissatisfied with what was happening. If a similar situation were to occur on the Kuskokwim, it is more likely to bring about resentment and division between the people and ADF&G, and possibly “illegal” fishing out of desperation and general discontent like what happened in 2013.

A note here: there is a big difference in population between the lower and middle/upper Kuskokwim areas.

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 less than 2000. 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 close to 12,500. Bethel alone has a population of over 6,000. Because most of the people live on the lower part of the Kuskokwim (below the 2 Kalskags), there are more fish camps and if chinook salmon are allowed to be caught for subsistence uses, the lower river will always be allotted more than the middle and upper Kuskokwim, and it won’t be “disproportionate” but will be more fair and equal than not.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 276 – against

Customary and traditional fishers in the Kuskokwim River have had the use of fish camps to gather and dry fish for future consumption. There are no communal fish camps – that is, a fish camp for the whole community – in the Kuskokwim River. There are fish camps shared by immediate family members. This proposal to establish permits will result in giving opportunity to individuals or families who have not customarily and traditionally harvested Chinook or other
salmon stocks; all they have to do is to say that they live in rural Alaska and are subsistence gatherers. In some of the villages, a single or two member families sometimes 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 qualify for a household permit because they will be listed as State residents and rural subsistence gatherers even if they had not practiced the subsistence lifestyle of gathering fish.**

It would also be possible for those who have traditionally harvested salmon of not receiving a permit for their use because someone in the ADF&G office would be responsible for approving or denying any subsistence fishing permit applications and this especially would be the case if there are very low numbers available for harvesting Chinook. This will most certainly give rise to resentment towards the Fish and Game Department.

If we have to use a permit system for Chinook, then it might be possible for this to work by giving permits to those families who have now, and have had, fish camps.

You, sitting there in those seats, are going to be deciding our future and yet you don't live in our River and probably never will. Those of us who grew up in the Kuskokwim know what it is like to live there. **We are saying no to these two proposals because the outcomes will not promote peace and harmony if they are ever passed.**

Thank you.

*Signature*

Martin Nicolai
Kwethluk