



Ketchikan Indian Community

Office of the Tribal Council President
2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone

www.kictribe.org

January 21, 2018

Glenn Haight, Executive Director
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Haight,

I am writing this letter on behalf of Ketchikan Indian Community [KIC] to formally support the Alaska Board of Fisheries Proposal 99 as submitted by Sitka Tribe of Alaska on behalf of their members. This particular proposal is an effort to protect Sitka Sound Herring stock and subsistence harvest of herring eggs. The proposal recommends limiting commercial harvest to 10% of biomass. The KIC Tribal Council believes, as does the Sitka Tribe that herring are a critical forage fish that are better left in the marine environment to support the marine ecosystem and the subsistence sac roe and roe on kelp (and hemlock branch) fisheries.

The Sitka Sound area is known as the herring egg capital of northern Southeast. According to several of KIC's tribal elders, "practically everyone on the southeast, including but not limited to KIC tribal members, depends on Sitka sound herring for their eggs, acquired through some method of customary trade, barter and sharing". There is a percentage of herring eggs that are provided to our community from commercial fisheries as well. The KIC Tribal Council also believes that this finite resource needs to be protected from over harvest.

As a reminder to Alaska Board of Fisheries representatives and the general public; subsistence uses of wild resources are defined as 'noncommercial, customary and traditional uses' for a variety of purposes. These include: direct personal or family consumption as food... taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption (AS 16.05.940[32]). Under Alaska's subsistence statute, the Alaska Board of Fisheries must identify fish stocks that support subsistence fisheries ... adopt regulations that provide reasonable opportunities for these subsistence uses to take place. **Whenever it is necessary to restrict harvests, subsistence fisheries have a preference over other uses of the stock (AS 16.05.258).** (Emphasis added)

KIC will always advocate for subsistence rights that support "Our Way of Life". Therefore, we support Sitka Tribe of Alaska's historical and legal rights and ask the Alaska Board of Fisheries to honor the principles enshrined in law that protect subsistence used as a first priority by approving Fisheries Proposal 99.

Gunalchéesh, 'Doyackshn Háw'aa,

Irene Dundas
Tribal Council President

CC: Kathy Hope Erickson, Chairman, Sitka Tribe of Alaska