



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Don Hernandez, Chairman  
c/o1011 E. Tudor Road, MS121  
Anchorage, Alaska 99503**

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NOV 29 2019



Mr. Glenn Haight,  
Executive Director  
Board of Fisheries  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Mr. Haight:

The Southeast Subsistence Regional Advisory Council (Council) is one of ten regional advisory councils formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to Federally-qualified subsistence users, whom the Council represents.

The Council was informed that the State of Alaska recently enacted restrictions in District 13A, B and C, out of conservation concerns for the shrimp stock in District 13C. The Council is concerned about these restrictions and forwarded the concerns to the Federal Subsistence Board (Board) through its Annual Report.

In its reply to the Council, the Board suggested that the Council express its concerns directly to the Board of Fisheries. This letter is a result of that suggestion.

The Council has received public testimony, including comments from the Sitka Fish and Game Advisory Committee, regarding limits and restrictions placed on subsistence harvesting of shrimp under State regulations. There is a concern that these restrictions were based on anecdotal information and that the restrictions violate the Alaska subsistence statute that provides for a subsistence preference. Instead of enforcing law that prohibits illegal use of subsistence harvest (anecdotal information), additional restrictions were placed on the legitimate or legal subsistence harvester, making it difficult to meet their subsistence needs. The reallocation of this resource seems to be away from a subsistence harvester in favor of the commercial industry.

Tier 2 of the State subsistence regulation provides that if there is not enough resource to meet everyone's needs, elimination/restriction starts with **other** user groups before the subsistence harvest is restricted. The State chose to limit the subsistence harvesters to two five-gallon buckets per trip, requiring more trips to try to meet needs – this approach is not cost-effective.

Further, subsistence users are also required to fill out harvest reports with date, location, and volume harvested, and there is a concern that this information will be used to establish an Amount Necessary for Subsistence (ANS). Lastly, "personal use" and "subsistence" are lumped into one category, contrary to State law distinguishing those two user groups.

Subsistence users are disturbed by these restrictions and the risk of similar actions taking place in other areas of Southeast Alaska in the future. The Council was informed that the Sitka Advisory Committee is attempting to pursue a review of the Board of Fisheries; however, the next Southeast cycle is another two years away. In the meantime, the Sitka Advisory Committee would like to see this matter in front of the public for more comments. It is anticipated that the Council will continue to hear more on the matter in the future, as there is a genuine fear that the increasing popularity of the harvest of shrimp in this area will result in a decline of the shrimp resource because of the commercial fishery.

This Council requests that the State recognize the shrimp as a subsistence resource and consider this use when making management decisions for this resource.

Any questions regarding this letter can be addressed directly to me or through our Council Coordinator, DeAnna Perry, at (907) 586-7918, [deanna.perry@usda.gov](mailto:deanna.perry@usda.gov).

Sincerely,



Donald Hernandez  
Chair

Mr. Haight

3

cc: Federal Subsistence Board

Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management

Greg Risdahl Fisheries Division Chief, Office of Subsistence Management

Tom Kron, Acting Supervisory Council Coordination Division Supervisor

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Tom Whitford, Regional Subsistence Program Lead, Forest Service – Alaska Region

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DeAnna Perry, Southcentral Regional Advisory Council Coordinator

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George Pappas, State Subsistence Liaison, Office of Subsistence Management

Southeast Alaska Subsistence Regional Advisory Council

Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game

Interagency Staff Committee

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