

To the Alaska Board of Fisheries:

In order for the Alaska Board of Fisheries (BOF) to reconsider a motion, the policies state that “a motion to reconsider must be supported by a presentation of new evidence that was not before the board at the time the original vote was taken” (2012-267-FB).

After the December 2, 2021 vote on proposal 7, Ahtna Intertribal Resource Commission (AITRC) submitted RC 82, which clarifies information that was previously misrepresented. Additionally, AITRC staff present the following new information:

- Board deliberations on proposal 7 were ill-informed because the BOF interpreted that dipnetting from a boat harvest is lower than harvest from shore-based dipnets. In the presentation provided by Sport Fisheries Division staff (RC 3, Tab 11), the Board determined that harvest by boat-based dipnetters was lower than other methods in the Glennallen Subdistrict by focusing their deliberations on Slide 9. However, dipnetting from a boat actually has a higher total harvest than dipnetting from shore as illustrated in Slide 8. RC 82, which was submitted after proposal 7 failed, corrects the misinterpretation of these data.
- During deliberations on proposal 7, it was suggested that dipnetting from a boat is less effective at catching fish than dipnetting from shore. However, what was not considered during deliberations was the difference in time that it takes to harvest salmon between shore-based and boat-based dipnetting; rather, the board focused their deliberations on harvest per permit comparisons. This oversight in board deliberations is significant because guided dipnetters in boats tend to complete only one fishing trip per year, typically only a few hours in length. This is in contrast to shore-based dipnetters, who often make multi-day fishing trips, spend many hours fishing, and have a lower total harvest as demonstrated in Slide 8.
- Dipnetting from boats is relatively new as a method and means of harvest in the Glennallen subdistrict. Guided dipnetting from boats only began in recent years. This fact was not acknowledged by ADF&G Sport Fisheries managers during their presentation, which served to misinform the board’s deliberations by conflating boat-based transportation services provided for the Chitina Subdistrict Personal Use fishery downriver.
- Chinook salmon escapement has not been met 50% of the time during the past eight years, requiring close monitoring and attendance of fish wheel operations pursuant to 5 AAC 24.361(e). In the Glennallen Subdistrict, ADF&G can require subsistence fish wheels to be closely attended during times of Chinook conservation to reduce or prohibit king salmon retention. Whenever fish wheels must be closely attended, they are effectively a non-passive means of harvesting subsistence fish. In other words, fish wheel users cannot always simply walk away from their wheels. This is different from how subsistence fish wheels were characterized during the Board’s deliberations.
- Board deliberations briefly discussed subsistence fish wheel harvests relative to boat-based and shore-based dipnet harvest, but deliberations failed to consider significant regulatory restrictions associated with subsistence fish wheel permits in the context of the issues being addressed in Proposal 7.
- Subsistence permitted fish wheels in the Glennallen Subdistrict cannot be commercially “rented, leased, or otherwise used for personal gain,” pursuant to 5 AAC 01.620(c)(6)(C), as was also clarified by a longtime commercial fisherman, who after deliberations on Proposal 7 were

completed, submitted RC 071. Allowing the use of boat-based guiding services to support boat-based subsistence dipnetting for personal gain, seems to give more liberal opportunities to this new method and means of subsistence fishing in the Glennallen Subdistrict than is allowed for the multi-generational fish wheel gear.

- Similarly, in the Prince William Sound area, including the Glennallen Subdistrict, 5 AAC 01.620 states, “The permit holder must personally operate the fish wheel or dip net.” Based upon our understanding a boat is considered part of the gear. While leasing a boat and other gear may be allowable for subsistence opportunities, it seems unclear that contracting commercial boat operation services is consistent with the non-commercial aspects of the statutory definition of subsistence uses.

Thank you for your consideration.

Ahtna Intertribal Resource Commission