



February 23, 2015

Alaska Department of Fish & Game
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Comments on Proposals before the Board of Fisheries at February 23-
March 3, 2015, Meeting in Sitka, Alaska

Board of Fisheries:

Sealaska Corporation is the Alaska Native Regional Corporation for Southeast Alaska established pursuant to the Alaska Native Claims Settlement Act (ANCSA). Sealaska represents more than 21,000 shareholders of Tlingit, Haida and Tsimshian descent, whose homeland is Southeast Alaska. On behalf of these shareholders and our shareholder communities, Sealaska respectfully submits the following comments for consideration by the Board of Fisheries.

As a general matter, Sealaska Corporation has been and always will be a strong supporter for the protection of the subsistence resources and uses within our region and throughout the State of Alaska. That being said, we are mindful of the importance of the commercial fisheries for the economy of our region and statewide. We strongly encourage the Board of Fisheries to balance those interests, but to recognize the priority placed on subsistence activities because of its significance to the cultural identity of the Alaska Native people and the importance of such activities in rural communities for basic sustenance and survival.

Herring Fisheries

Sealaska supports those proposals submitted by the Sitka Tribe of Alaska that ensure protection of the herring resources generally. There are far fewer herring runs that meet this important subsistence need in our region, and Sitka has one of the few remaining herring fisheries. By ensuring that we continue to have a healthy stock of herring, the Board of Fisheries ensures that there will be herring resources for the importance subsistence uses. That being said, a strong and healthy herring fishery also could continue to contribute to the commercial fishing needs in the area. Consideration of the Sitka Tribe's proposals will ensure that a minimum threshold is established and maintained for the herring fisheries.

Sealaska is concerned about any proposals that would mandate a commercial fishery or clearly lower the amount of herring necessary for subsistence users. The Board of Fisheries should continue, in accordance with the sustained yield principle, to have some discretion on whether a commercial fishery should occur, regardless of the occurrence of herring biomass above a minimum threshold. Moreover, any lowering of the amounts of herring reasonably necessary for subsistence should be clearly based on current and accurate data and consultation with the affected subsistence users.

It is worth noting that Sealaska's affiliate, Sealaska Heritage Institute (SHI), has been active on the traditional herring harvest issue. In particular, SHI is assessing the reintroduction of herring fisheries in areas where herring stocks were formerly abundant and are now depleted or destroyed.

Support for Additional Community Proposals

Sealaska understand that some of our Southeast rural communities have submitted proposals to address the subsistence needs and concerns in their communities. We would like to express our support for those proposals. For example, in Angoon, we support their desire to ensure a strong and clear basis for the determination of the amount of fish stocks necessary for subsistence uses. For Hoonah, we support the designation of "community subsistence harvesters" to allow designated individuals to exercise subsistence permits on behalf of those individuals who do not have the means to harvest subsistence resources themselves. There are many other proposals that we could specifically call out, but as a general matter, Sealaska does support those efforts by our village and rural communities to ensure that their subsistence needs are met and preserved.

Closing Remarks

Thank you to the Board of Fisheries for coming to Southeast Alaska to hear the concerns of our local communities and to consider the many proposals and comments before you. We know that you have a daunting task before you to ensure that the multiple fisheries interests are met. Sealaska would like to thank the Board of Fisheries for the opportunity to submit these comments on behalf of Sealaska Corporation and its constituents in support of the protection of subsistence uses.

Respectfully,

SEALASKA CORPORATION



Jaeleen J. Araujo

V.P. General Counsel & Corporate Secretary