

From: [Phyllis Shirron](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Proposal 7, new information for reconsideration
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Clarification on history of subsistence guides since the 1990s

I asked specific questions to Mark Somerville to clarify his statements. He told me '1 boat in the 90s occasionally did a drift subsistence charter. It was sporadic. Often he provided a drop-off service. That service was more aligned with subsistence traditions of trade, as nominal money exchange. In the last 2 years permits utilizing drift charters are 100-200 per season, which correlates with the increase in boats and guides per outfit'

Lisa Olson stated for the record, that 20 years of consistent activity is only *one* criteria of subsistence. The national standard of Federal Indian Law is 25 years to be considered a standard. The longest running, consistent guide service has only been active for 9 years. It is only the last 2, that multiple services with multiple vessels and guides, are participating in this activity.

Prior to implementing a new fishery in Alaskan waters, extensive research is done, test fisheries conducted, then oversight is determined. Those actions have not been taken for the drift charters related to to proposal 7.