

Proposal 165: On The Record Comments by Department of Law on Subsistence Guiding:

Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish Meeting on Dec. 5th, 2021 Cordova, AK.

RC100 discussions @10:54:40 AM on Dec 5th, 2021, In that meeting Dept of Law stated that “there is no question that by definition that banning guided access to a subsistence fishery that it does in fact restrict access to subsistence users”. And “that any subsistence restrictions be grounded in a biological conservation concern and this guided access restriction did not meet the 8 criteria for subsistence 5 ACC99.101”

Paraphrased from AK DFG meeting audio available at the link below.

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2021-2022/pws21/index.html?mediaBasePath=/Meeting%2012-05-21%20%28Dec-05-21%205-28-43%20PM%29#>

