

RC# 124

December 10, 2012

Jonathan Forsling
Togiak AC Chair
Nushagak AC Member
Togiak Traditional Council

My Comments are in regards to Proposal 14. The State of Alaska has failed to identify an amount necessary for subsistence for spawn on kelp. This had led to the failure by the State of Alaska to provide for a subsistence priority as specified under AS 16.05.258 (b).

(b) The appropriate board shall determine whether a portion of a fish stock can be harvested consistent with sustained yield. If a portion of a stock can be harvested consistent with sustained yield, the board shall determine the amount of the harvestable portion that is reasonably necessary for subsistence uses and (2) If the harvestable portion of the stock is sufficient to provide for subsistence uses and some but not all, other consumptive uses, the appropriate board (c) shall adopt regulation to differentiate among consumptive uses that provide for preference for subsistence uses.

The proposals Traditional Council of Togiak have authored as written cannot achieve the intent of this statute nor can they achieve the subsistence need of my community and the Ecosystem, aside from Proposal 13. The progress of information which I have gathered has been over the last four years and the amount and validity of the information has grown exponentially. With the new information available, I have to come together with some users of the resource and the Nushagak AC Chair and discussed new information and the intent of the original proposals.

After some discussion I developed new language in RC #89. To attempt to develop a suitable compromise that accounts for all users including that environment. This language can make a realistic attempt to provide for subsistence needs while still being agreeable to the intent of the original proposal which was adopted by the Togiak and Nushagak Advisory Committee's. Nushagak AC is comprised of three of the nine local fisherman of the resource. With the new information presented by department staff, the original proposal as written would not accomplish the intent the proposal.

Although, this proposal is not for the sole purpose of spawn on kelp, I would like the Board to request the ADF&G Division of Subsistence to come up with the amount necessary for subsistence of spawn on kelp for the communities within my region. As spawn on kelp is one of the concerns for which my proposal would address if adopted.

I would like to thank the Board for consideration and time that was given for our participation in this process.

Respectfully,


Jonathan Forsling