

RC 25

Alaska State joint Boards of Fish and Game

September 24, 2013

Reference: State Joint Boards Proposal 40

The community of Kodiak is currently a subsistence area and there have been no changes to the community which warrant a change in subsistence status. Kodiak remains a community where dependence upon subsistence items is a principal characteristic of the economy, culture, and way of life of the area or community.

State Subsistence Division technical report 386, by James Fall ADF&G clearly documents that Kodiak is indeed a subsistence community. as do all of the past C& T determinations conducted by the Alaska Boards of Fish and Game. The multi- year Federal "Rural Determination process" completed in 2006, reaffirmed for a second 2nd time in) that Kodiak was a rural community deeply involved in subsistence. .

We believe that this is purely an allocative proposal without adequate or accurate justification.

Therefore, Proposal 40 should be opposed.

Kodiak has:

- A long-term consistent pattern of noncommercial taking, use, and reliance on the fish stock or game population that has been established over a reasonable period of time of not less than one generation, excluding interruption by circumstances beyond the user's control, such as unavailability of the fish or game caused by migratory patterns.
- A pattern of taking or use recurring in specific seasons of each year.
- A pattern of taking or use consisting of methods and means of harvest that are characterized by efficiency and economy of effort and cost.
- The area in which the noncommercial, long-term, and consistent pattern of taking, use, and reliance upon the fish stock and game population has been established.
- A means of handling, preparing, preserving, and storing fish or game that has been traditionally used by past generations, but not excluding recent technological advances where appropriate.
- A pattern of taking or use that includes the handing down of knowledge of fishing or hunting skills, values, and lore from generation to generation.
- A pattern of taking, use, and reliance where the harvest effort or products of that harvest are distributed or shared, including customary trade, barter, and gift-giving.
- A pattern that includes taking, use, and reliance for subsistence purposes upon a wide variety of fish and game resources that provides substantial economic, cultural, social, and nutritional elements of the subsistence way of life.

Sincerely,


Speridon Semionof

Chairman

Kodiak Aleutians Regional Advisory Council