



October 15, 2014

To: Alaska Board of Fisheries

Re: **Agenda Change Request (ACR) #8**

Orutsararmiut Native Council (ONC) is the Tribal Governing body for the community of Bethel, and submits the following for your consideration regarding ACR #8 which proposes establishing a Tier II permit system, creating "nested" amounts necessary for subsistence within the management area, or seeking other alternatives for providing equitable subsistence harvest opportunity/needs for Kuskokwim Chinook salmon within the region.

As the Board is aware there can be no question that there are severe conservation concerns regarding Kuskokwim Chinook salmon. At the same time it is the largest subsistence harvest/use identified for Chinook within the state, historically comprising approximately half of the entire subsistence harvest and use of this species statewide. As such the depleted runs and subsequent restrictions and closures associated for subsistence harvest opportunity in recent years has been utterly disruptive to cultural integrity, seasonal limitations, and recognized patterns of use established over the centuries. The negative impact to subsistence uses, coupled with associated management issues for this stock in consideration of generations to come, cannot be over emphasized.

Given this magnitude of impact, the broad range of management options, and in light of AS 16.05.330 ( c ) referenced in the department comments, it is our recommendation that the Board of Fisheries establish a Committee charged to address the full range of management options (Tier 1, Tier 2, community harvest permits etc.) identified or raised by this ACR, and develop management recommendations and/or potential proposals for the Board's consideration during its next scheduled AYK regional regulatory cycle.

Membership on this Committee should be inclusive of at least 2-3 BOF members; a representative from each of the 5 Kuskokwim drainage Advisory Committees and Kuskokwim Salmon Management Working Group; and to facilitate involvement of regional leadership and tribal interests, 3 members (lower, middle & upper river) selected by the Association of Village Council Presidents.

Quyana for your positive consideration of these comments.

Submitted by: Greg Roczicka, Director – ONC Natural Resource Dept.