

ALASKA LEGISLATURE COMMITTEE FILES 1985 - 1986 8672
4222.35 RES SUBSISTENCE: PUBLICATIONS (file 2)

Continued - Whitefish

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Anchor Point to Cape Fairfield				absent
Alaska Peninsula	1**	0	0*	
Kodiak				absent
Southeastern				absent

Kusko'wim River Whitefish

1. Present Use: High subsistence use by local residents for food for humans and dogs; low commercial use at present, but has potential to increase substantially; no sport fishing use.
2. Conflicts/Problems:
 - a. Few conflicts between subsistence and commercial fishing at present, but gear conflicts and overharvesting could result if there were a substantial increase in commercial fishing.
 - b. Present subsistence fishery in some locations is wasteful and may be resulting in overharvesting. Specific problems include leaving gillnets unattended for long periods of time and blocking waterways with fishing gear.
 - c. Subsistence harvests, and therefore need, are not adequately documented.
 - d. Some whitefish stocks undergo extensive migrations and their management must encompass a large portion of the drainage.
3. Allocation: Local subsistence use to be given preference with a small surplus allocated to commercial fishery mainly for local markets. Participation of residents from outside the watershed in these fisheries should remain insignificant. Sport fishing use is expected to remain insignificant.
4. Options:
 - a. Continue present regulations and policy in respect to commercial fisheries:
 - 1) Commercial fishing closed in the Johnson River drainage.
 - 2) Commercial fishing authorized by special permit only which places harvest limitations on individual buyers and prohibits use of gillnets less than 5 inch mesh.
 - b. Consider regulatory proposal creating area or subarea catch quotas for commercial fishing.
 - c. In locations where subsistence fishing abuses are occurring require that gillnets be removed from the water at regular intervals and begin enforcing present regulations pertaining to identification of fishing gear and blocking waterways with fishing gear.
 - d. Expand I & E program to discuss issues with local residents.
 - e. Initiate program to determine subsistence use levels and need.

Species: Bottomfish

<u>AREA/DISTRICT</u>	<u>SUBSISTENCE</u>	<u>COMMERCIAL</u>	<u>RECREATIONAL</u>	<u>COMMENTS</u>
A-Y-K				under "other species"
Bristol Bay				under "other species"
Cook Inlet:				
West Side (Susitna to Cape Douglas)	0*	1**	0	
East Side (Susitna to Portage)	0**	0*	0	Stocks unknown.
Anchor Point to Cape Fairfield	0**	2*	1*	May be high potential.
Kodiak				under "other species"
Southeastern				under "other species"

Species: Halibut

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
A-Y-K:				
Kuskokwim	1**	0	0	
Yukon	0	0	0	
Norton Sound	1**	0	0	
Port Clarence	0	0	0	
Kotzebue	0	0	0	
Northern	0	0	0	
Bristol Bay				under "other species"
Cook Inlet:				
West Side (Susitna to Cape Douglas)	1**	2*	1*	
East Side (Susitna to Portage)	0**	1*	2*	
Anchor Point to Cape Fairfield	1*	3**	2*	
Kodiak:				
Kodiak Island West of Hidden Basin to Kekur Point	2**	3*	0*	

Continued - Halibut

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Afognak - Raspberry Island Kodiak Island Hidden Basin to Kekur Point	2**	3*	3*	
Southeastern	1	0	3**	High recreational use.

Species: Herring

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
A-Y-K:				
Kuskokwim	3**	1*	0	
Yukon	2**	1*	0	
Norton Sound	1**	0*	0	
Port Clarence	1**	0*	0	
Kotzebue	1**	0*	0	
Northern	1**	0	0	
Bristol Bay:				
Kvichak - Naknek				under "other species"
Togiak	1**	3*	0	
Nushagak - Mulchatna				under "other species"
Prince William Sound	1*	3**	1*	Recreational use for bait capture.
Cook Inlet:				
West Side (Susitna to Cape Douglas)	1*	3**	0	
East Side (Susitna to Portage)	1**	2*	0	

Continued - Herring

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Anchor Point to Cape Fairfield	1**	2*	0	
Alaska Peninsula				under "other species"
Kodiak				under "other species"
Southeastern	1**	1*	1*	

Herring Fisheries - Cape Newenham to Yukon River

1. Present Use: Low to high subsistence use by local residents depending on location, with very high use in Nelson Island area (present subsistence catch is small compared to the estimated herring population). Domestic commercial use currently low but potentially high; foreign commercial use of these same stocks in inshore waters is currently high.
2. Conflicts/Problems
 - a. Herring resources have declined in past years and are only recently showing good recovery. Subsistence users are fearful of overharvesting by an expanding domestic commercial fishery. Overharvesting may result from fisheries within local areas and fisheries intercepting stocks bound for other areas.
 - b. Subsistence users are fearful that introduction of commercial fishing will result in subsistence fishing restrictions.
 - c. Some local residents are interested in commercial fishing but feel that present regulations allowing purse seines favor the operation of large, mobile and more competitive fishing fleets from Kodiak and other areas of the state.
 - d. Failure of domestic fisheries to take available surplus of eastern Bering Sea herring stocks will perpetuate and possibly increase offshore harvests of the foreign fishing fleet (based on the Fisheries Conservation and Management Act of 1976).
3. Allocation: Local subsistence is given preference with any surplus beyond subsistence needs allocated to domestic commercial fishery. Local residents should be encouraged to participate in the domestic commercial fishery. The foreign commercial fishery in offshore waters should be reduced to only the incidental take of herring in fisheries targeting on other species.
4. Options:
 - a. Regulations adopted for the 1978 season represent partial solutions:
 - 1) The coastline between Carter Spit and Dall Point is closed to commercial fishing (includes Kuskokwim Bay, Nelson Island, Nunivak Island, Hooper Bay, etc).
 - 2) Commercial fishing districts have been established immediately adjacent to known spawning areas to minimize interception of stocks bound for other areas; also these districts have been established in areas where subsistence fishing is minimal or non-existent.

- 3) Commercial fishery is restricted to relatively small guideline harvest levels. Intensive monitoring of the fisheries is done to insure harvestable surpluses.
 - 4) No restrictions on subsistence fishing.
- b. Additional regulation proposals to be considered include:
- 1) Prohibition of purse seines, thus allowing only gillnets and beach seines as commercial fishing gear; or establish separate quotas for each gear type.
 - 2) Area registration, which restricts commercial fishermen to fishing in just one "area" during any fishing season.
 - 3) The above regulations would favor local resident participation, result in a slower paced, easier to manage fishery, and minimize conflicts between subsistence and commercial fishermen.
- c. An expanded I & E program consisting of the following elements:
- 1) Frequent meetings between Department and local residents to discuss issues.
 - 2) Distribute in-season information to local residents regarding abundance and distribution of herring and fishing techniques that will make fishing more productive.
 - 3) Encourage local residents in adjacent villages to share catches or fishing grounds if there is a shortage of herring due to inclement weather or unusual fish migration patterns.
- d. Continue no restriction of subsistence fishery unless illegal sale of subsistence caught fish is occurring.

Species: Smelt

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
A-Y-K:				
Kuskokwim	3**	0	0	
Yukon	3**	0	0	
Norton Sound	3**	0	0	
Port Clarence	3**	0	0	
Kotzebue	3**	0	0	
Northern	3**	0	0	
Bristol Bay:				
Kvichak - Naknek	3**	0	1*	
Togiak	3**	0	1*	
Nushagak - Mulchatna	3**	0	1*	
Prince William Sound	1**	0*	0*	
Cook Inlet:				
West side (Susitna to Cape Douglas)	0**	0	1*	
East side (Susitna to Portage)	3**	0	2*	Subsistence - mouth of Kenai only.

Continued - Smelt

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Anchor Point to Cape Fairfield	0**	0	0	
Alaska Peninsula	1**	0*	0*	
Kodiak				(under other species)
Southeastern	1*	0	3**	Important future recreational use.

Other Species: Lamprey, sucker, blackfish, stickleback, chub, sculpins and numerous marine species.

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
A-Y-K:				
Kuskokwim	3**	0*	0*	
Yukon	3**	0*	0*	
Norton Sound	3**	0*	0*	
Port Clarence	3**	0*	0*	
Kotzebue	3**	0*	0*	
Northern	3**	0*	0*	
Bristol Bay:				
Kvichak - Nushagak	1**	0	0*	
Togiak	1**	0	0*	
Nushagak - Mulchatna	1**	0	0*	
Alaska Peninsula	1**	0	0*	
Kodiak:				
Kodiak Island West of Hidden Basin to Kekur Point	1**	3*	0*	
Afognak - Raspberry Island Kodiak Island Hidden Basin to Kekur Point.	0**	1	2*	

Continued - Other Species

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Southeastern flounder cod rockfish	1*	0	3**	High recreational use; will become more important for recreation.

Species: King Crab ^{1/}

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Kodiak	2*	3**	1*	High commercial use.
Alaska Peninsula	2*	3**	1*	High commercial use.
Dutch Harbor	2*	3**	1*	High commercial use.
Adak	2*	3**	1*	Commercial species.
Bering Sea	2*	3**	1*	

^{1/} Data for other areas unavailable at time of printing.

SPECIES: King Crab

1. Present Use:

Current commercial utilization is extremely high, while subsistence/recreational use levels are low to moderate. Many people who fish recreationally take shellfish under the subsistence portions of current regulations. One area of above average subsistence and recreational use is in the Nome section of the Northern Bering Sea district.

2. Conflicts/Problems:

There are no conflicts between most user groups; however, problems associated with the Nome section fishery are discussed in an attachment.

3. Allocation:

In most areas king crab are used primarily for commercial purposes, while subsistence effort and catches are low. Consequently, commercial uses are designated as the highest priority use of this resource. However, in the Nome section of the Northern Bering Sea district longstanding subsistence and recreational fisheries have occurred. In this section regulations and policies have been designed to protect these fisheries. In all areas, few regulations exist limiting subsistence use of king crab.

4. Options:

Maintain current regulations and management policies in most areas, since they adequately provide for subsistence requirements.

King Crab (Nome Section of Northern Bering Sea)

1. Present Use:

King crab are currently being utilized by subsistence fishermen at low to moderate levels. Commercial fishing effort and catches have increased tremendously during the last few seasons after initiation of a winter "through the ice" fishery and a summer large vessel fishery.

2. Conflicts/Problems:

a. King crabs are used for recreation and subsistence by local residents during the winter months. These people feel expanded commercial use, especially by a large vessel fishery, will result in overharvest of the resource and will impact local harvests.

b. The winter fishery was initiated by local residents in an effort to provide employment during the lean winter months. They have requested the Department and the Board of Fisheries (both through the local fishermen's association and advisory committee) to keep the fishery limited until additional biological data is available to ensure the resource is not overharvested. Many local commercial fishermen feel:

- (i) the large vessel fishery poses a threat to the resource in the form of overharvest
- (ii) the large vessel fishery is too efficient and prevents local fishermen from entering the fishery
- (iii) the large vessel fishery is counterproductive to the local economy since it receives no benefits from the offshore operation.

On the other hand, large vessel operators feel local sentiment is parochial and designed to keep non-local fishermen from the resource. In addition, they feel the resource is abundant and the fishery can be expanded.

c. There is little enforcement capability to monitor the large vessel operation during the summer. Consequently, significant illegal fishing has occurred by the large vessel fleet.

3. Allocation

The recreational/subsistence fishery has the highest priority use of the resource. In addition, the Board has indicated the local commercial fishery would be reallocated additional crab from the summer fishery as it expands.

4. Options:

a. Maintain current regulations and guideline harvest levels, while gathering additional data from the commercial and subsistence fisheries and research projects.

b. Improve enforcement capabilities in the Northern Bering Sea through additional use of U. S. Coast Guard aid.

Species: Dungeness Crab ^{1/}

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Kodiak	2*	3**	1	High commercial use.
Alaska Peninsula	2*	1**	1	Commercial species.
Dutch Harbor	2*	3**	1	
Adak	2*	1**	1	
Bering Sea	1*	1**	1	

^{1/} Data for other areas unavailable at time of printing.

SPECIES: Dungeness Crab

1. Present Use:

Dungeness crab are used primarily and extensively for commercial purposes. Recreational and subsistence use is low to moderate. Recreational fishermen obtain dungeness under subsistence provisions of current regulations.

2. Conflicts/Problems:

None.

3. Allocation:

Subsistence and recreational use of dungeness crab are currently at much lower catch and effort levels than the commercial fishery. Consequently, the commercial fishery has been designated the highest priority use of the resource. However, subsistence and recreational harvests are essentially unregulated, so harvests requirements may be adequately satisfied.

4. Options:

Maintain current management and regulatory policies which allow for subsistence requirements to be satisfied.

Species: Tanner Crab ^{1/}

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Kodiak	2*	3*	1	High commercial use.
Alaska Peninsula	2*	3**	1	High commercial use.
Dutch Harbor	2*	3**	1	High commercial use.
Adak	2*	2**	1	Under-exploited.
Bering Sea	2*	3**	1*	High commercial use.

1/ Data for other areas unavailable at time of printing.

SPECIES: Tanner Crab

1. Present Use:

Tanner crab are used primarily for commercial purposes, while subsistence and recreational catches are made under subsistence provisions of current regulations.

2. Conflicts/Problems:

None.

3. Allocation:

The commercial fishery is designated as the highest priority use of the resource due to the high level of utilization; however, few limitations are placed on the subsistence or recreational fisheries, except for those provisions designed to keep these crab from entering commercial channels. Consequently, subsistence and recreational fishermen are able to adequately satisfy their requirements.

4. Options:

Maintain current regulations and policies, which have provided for subsistence requirements to be met.

Species: Scallops 1/

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Kodiak	1*	2**	1	
Alaska Peninsula	1*	1**	1	
Dutch Harbor	1*	1**	1	
Adak	1*	1**	1	
Bering Sea	1*	1**	1	

1/ Data for other areas unavailable at time of printing.

SPECIES: Scallops

1. Present Use:

Scallops are only used at moderate levels for commercial purposes, while use by subsistence or recreational fishermen is low.

2. Conflicts/Problems:

None.

3. Allocation:

Due to the low use levels by all users, few regulations or policies have been formulated. Consequently, subsistence use remains unrestricted.

4. Options:

Maintain current management and regulatory policies until use of this species increases.

Species: Shrimp 1/

AREA/DISTRICT	SUBSISTENCE	COMMERCIAL	RECREATIONAL	COMMENTS
Prince William Sound	1*	2**	0	
Cook Inlet	2*	3**	0	Some recreational use but under subsistence.
Kodiak	2*	3**	1	High commercial use.
Alaska Peninsula	2*	3**	1	High commercial use.
Dutch Harbor	2*	3**	1	High commercial use.
Adak	1*	1**	1	
Bering Sea	1*	1**	1	

1/ Data for other areas unavailable at time of printing.

SPECIES: Shrimp

1. Present Use:

Shrimp are used extensively for commercial purposes, while recreational and subsistence user levels are low to moderate. Recreational harvests are made under subsistence provisions of current regulations.

2. Conflicts/Problems:

None.

3. Allocation:

The commercial catches and effort are much higher than for the recreational or subsistence fisheries. Consequently, commercial uses have been designated as the highest priority use of the resource. The recreational fishermen is able to harvest shrimp under subsistence regulations. These regulations are very unrestrictive and are designed to keep recreational or subsistence catches from entering commercial channels. Consequently, recreational and subsistence fishermen are able to adequately satisfy their requirements.

4. Options:

Maintain current regulatory and management policies, which provide for adequate subsistence and recreational catches to be made.

SPECIES: Clams

1. Present Use:

Clams are currently being used primarily for recreational or subsistence purposes; however, a commercial potential is present in some areas.

2. Conflicts/Problems:

None.

3. Allocation:

Due to the low level of utilization in most areas, few policies or regulations have been formulated. There are virtually no restrictions on subsistence use and, in several areas, subsistence has been designated as the highest priority use of the resource. However, in some areas the potential for commercial fisheries exists and would not affect low subsistence harvests. Consequently, commercial uses have been assigned a higher priority in these areas.

4. Options:

Maintain current management and regulatory strategies until the various fisheries develop.

APPENDIX IV
CURRENT POLICIES AND REGULATIONS THAT ACCOMODATE
SUBSISTENCE USES

COMPARISONS BETWEEN THE "SUBSISTENCE LAW" AND POLICY STATEMENTS
BY THE COMMISSIONER AND ALASKA BOARD OF FISH AND GAME

Attached is a subsistence utilization policy statement by the Commissioner and Alaska Board of Fish and Game first issued in May 1973 and still in effect. The following excerpts from this policy demonstrate its similarity to the intent of the subsistence law presented in Appendix I:

- (1) Direct domestic utilization of fish and game is still vital to the existence of many rural Alaskans and is an essential supplement to the larders of some urban citizens.
- (2) Home consumption of fish and game tends to preserve cultures and traditions.
- (3) Existing cultures and life styles in Alaska are of great value and should be preserved.
- (4) Domestic utilization is still of fundamental importance to many Alaskans. Accordingly it is assigned the highest priority among beneficial uses.
- (5) Within legal constraints fish and game will be allocated to subsistence users on the basis of need.
- (6) Elements considered in establishing the level of need include:
 - (a) cultures and customs
 - (b) economic status
 - (c) alternative resources (availability of social services)
 - (d) location
 - (e) voluntary choice of life style
- (7) Recreational and commercial uses will continue to be permitted where and to the extent that they do not interfere with or jeopardize subsistence resource use.

Differences between this policy statement and the subsistence law include:

- (1) The law appears to emphasize "customary and traditional" aspects of subsistence uses while the policy statement emphasizes "need", especially when allocating subsistence harvests.
- (2) The policy includes the statement that "limitations on the productivity of fish and game stocks prohibit continued increases in the numbers of subsistence resource users" while the law makes no mention of the latter condition.

SUBSISTENCE UTILIZATION OF FISH AND GAME POLICY
STATEMENT BY THE COMMISSIONER AND ALASKA BOARD OF FISH AND GAME

Although fish and game resources were once a crucial factor in the survival of all Alaskans, a growing population segment is becoming partially or totally independent of these resources. This change is the result of advanced food production technologies elsewhere, rapidly improving logistics, and a growing immigrant population whose demands mainly involve recreational uses of the resource. Nevertheless, direct domestic utilization of fish and game is still vital to the existence of many rural Alaskans and is an essential supplement to the larders of some urban citizens. Beyond directly satisfying food requirements, home consumption of fish and game tends to preserve cultures and traditions and gives gratification to a strong desire possessed by many to hunt and fish. The latter functions seem genuinely important to the physical and psychological wellbeing of a large number of Alaskans.

By reason of culture, location, economic situation or choice, large numbers of people will find it impossible to abandon or alter their way of life at a pace paralleling changes brought by new shifts in land status and ownership, nonrenewable resource developments, transportation improvements and a phenomenal rate of population growth. The following policy statement on subsistence use of the fish and game resource has been prepared in recognition of the above facts and of the responsibilities mandated to the Board and the Commissioner.

The Fish and Game Board and the Commissioner of Fish and Game recognize that existing cultures and life styles in Alaska are of great value and should be preserved.

The Board and the Commissioner believe that, although limitations on the productivity of fish and game stocks prohibit continued increases in the numbers of subsistence resource users, domestic utilization is still of fundamental importance to many Alaskans. Accordingly it is assigned the highest priority among beneficial uses.

Within legal constraints fish and game will be allocated to subsistence users on the basis of need. Needs of individuals, families or cultural groups differ in type and degree and it is recognized that subjective judgement will be an unavoidable necessity in weighing actual need. Elements considered in establishing the level of need include cultures and customs, economic status, alternative resources (availability of social services), location and voluntary choice of life style.

The Board and Commissioner also understand that subsistence requirements will not affect all resources in all areas equally, and recreational and commercial uses will continue to be permitted where and to the extent that they do not interfere with or jeopardize subsistence resource use.

REVIEW OF CURRENT REGULATIONS, STRATEGIES AND OTHER LAWS AND POLICIES THAT ACCOMODATE SUBSISTENCE USE PREFERENCES

In addition to the aforementioned policy statement by the Commissioner and Alaska Board of Fish and Game, policies favoring subsistence uses have been explicitly stated in Alaska Game Management Policies and implicitly in various regulations and management plans, particularly with respect to fisheries. Many of these are specifically designed to give subsistence use preferences through various methods including timing and duration of seasons, liberal or nonexistent bag limits, legalization of barter, constraints on means of access and even selective enforcement. The following partial list of regulations, laws and policies are presented separately for hunting and fishing and pertain mainly to that portion of the State north of the Alaska Range and Bristol Bay, where subsistence dependence is the greatest.

HUNTING--TRAPPING

Alaska's game laws and regulations have since statehood and before provided regulations to accommodate the special needs of subsistence users. Traditionally, hunting seasons have been long and bag limits have been large, especially in those sections of Alaska away from the centers of population. In recent years, changing game populations due to natural fluctuations, changed environmental conditions, hunting, predation and other causes has necessitated shorter seasons and smaller bag limits.

Nevertheless, when the species in question is abundant, game managers and the boards have generally tried to set seasons at times which either favor local users or at least provide for this use. When game populations are low, seasons are short or closed. Short seasons are designed primarily to keep harvest low. They do, however, have a built in advantage for local users who are likely to be intimately familiar with a given area and its game resources, and are often more likely to take game than non-local persons.

While all of the regulations at least provide an opportunity for subsistence users to take game, some sections favor these users or at least accomodate their special needs. The following lists the laws and regulations which meet these criteria in the 1978-79 Alaska Hunting and Trapping Regulations. This is a preliminary list, and some laws or regulations are listed more than once in separate sections.

A. Licenses and tags

1. An Alaska resident trapping license sells for \$3. AS 16.05.340
2. A \$0.25 license is available to those residents who qualify under certain income or assistance guidelines. AS 16.05.340

3. The 35-year residents of Alaska who have attained their 60th birthday are not required to purchase a license for sport hunting, sport fishing or trapping. AS 16.05.400. The Department provides a convenient free identification card on request.
4. Big game tags for all food species except brown/grizzly bear--both relatively minor food items--are free to residents. AS 6.05.340
5. Residents under 16 years of age are not required to have a license for sport hunting, sport fishing or trapping. AS 16.05.400
6. Caribou hunting in the range of the Western Arctic herd is by permit only. Permits are available in all villages in that area. The season is August 10 to October 15 and February 15 to April 15. Two bulls may be taken, but only one from August 10 to October 15. 5 AAC 81.055, 5 AAC 81.320(5)
7. Persons transporting caribou south of the Yukon River must obtain Arctic Caribou Harvest Tickets, and only two caribou per year may be transported from Units 25 and 26(c). 5 AAC 81.010, 5 AAC 81.320(5)

B. Permits

1. Caribou hunting in the range of the Western Arctic herd is by permit only. Permits are available in all villages in that area. The season is August 10 to October 15 and February 15 to April 15. Two bulls may be taken, but only one from August 10 to October 15. 5 AAC 81.055, 5 AAC 81.320(5)
2. Moose hunting in Unit 5(A) is from October 15-November 15 and is by permit only. Permits are available at Yakutat only. 5 AAC 81.320(9)
3. Walrus hunting in Unit 17 is by permit only. Permits are available on a first come, first served basis at Togiak, Manokotak, Twin Hills and Clarks Point only. Only residents may hunt. 5 AAC 81.350(4)
4. Walrus hunting in Units 22, 23, and 26 is available without permit to residents traditionally dependent on the animals. All other persons must obtain one of the 100 available permits. 5 AAC 81.350(4)

C. Exclusive use based on residency, race or traditional use

1. Walrus hunting in Unit 17 is by permit only. Permits are available on a first come, first served basis at Togiak, Manokotak, Twin Hills and Clarks Point only. Only Alaska residents may hunt. 5 AAC 81.350(4)
2. In Alaska, Eskimos, Aleuts, and Indians may take auks, auklets, guillemots, murrees, and puffins and their eggs for food or clothing.

D. Some activities permitted in certain areas only

1. Some species may be sold or bartered, for example hares or unclassified game, and caribou may be bartered in Units 22 through 26. 5 AAC 81.200
2. Snowy owls may be taken only for food and only in Units 17, 18, 22, 23, and 26.

E. Emergency taking for food

1. Any person may take game for food during the closed season in case of dire emergency. 5 AAC 81.370.

F. Restrictions on transportation

1. Persons transporting caribou south of the Yukon River must obtain Arctic Caribou Harvest Tickets, and only two caribou per year may be transported from Units 25 and 26C. 5 AAC 81.010, 5 AAC 81.320(5)
2. Hunters in the Paradise Management area may not use aircraft transportation of themselves or moose. 5 AAC 81.231
3. Hunters in the Kalskag Management area may not use aircraft transportation of themselves or moose. 5 AAC 81.232
4. Hunters in the Koyokuk Management area may not use aircraft transportation of themselves or moose. 5 AAC 81.234

G. Season timing and bag limit

1. Caribou hunting in the range of the Western Arctic herd is by permit only. Permits are available in all villages in that area. The season is August 10 to October 15 and February 15 to April 15. Two bulls may be taken, but only one from August 10 to October 15. 5 AAC 81.055, 5 AAC 81.320(5)
2. Moose hunting in Unit 5A is from October 15 to November 15 and is by permit only. Permits are available at Yakutat only. 5 AAC 81.320(9)

3. Black bear seasons are open year round in many areas and in other areas the season runs during the period of pelt primeness and maximum edibility. 5 AAC 81.320(1)
4. Caribou season on Kodiak Island is open year round, and there is no limit. 5 AAC 81.320(5)
5. Caribou hunting in Units 9 and 17 is available during the fall when one caribou may be taken and during a winter season when two or four may be taken, depending on the area. 5 AAC 81.320(5)
6. In Unit 10, except Unimak and Adak Islands, caribou hunting is available year round, and there is no bag limit. 5 AAC 81.320(5)
7. Caribou in Unit 18 may be hunted only during late winter. The bag limit is one caribou. 5 AAC 81.320(2)
8. In Units 19A and 19B, two caribou may be taken, provided that only one may be taken per day, and only one may be taken from August 10 to October 31. The season runs August 10 to March 31. 5 AAC 81.320(5)
9. Caribou hunting in Units 25 and 26C is from July 1 to March 31 and the bag limit is five caribou. Two only may be transported from these units. 5 AAC 81.320(5)
10. Black-tailed deer seasons run three to five months in most areas where they are available, and bag limits range from one to four deer depending on deer populations. 5 AAC 81.320(6)
11. Mountain goat seasons begin from August 1 to October 1 and end from October 30 to December 31, depending on the area. Bag limit is one goat. 5 AAC 81.320(8)
12. Moose hunting in Units 9B and 9C runs from September 10-30 and December 1-31. The bag limit is one moose, but antlerless moose may be taken in the late season only. 5 AAC 81.320(9)
13. In Unit 9E moose hunters may take moose from September 10-October 10 and December 1-31, provided that bulls must be at least 50 inches in antler spread, and cows may be taken in the late season only. 5 AAC 81.320(9)
14. Unit 17 moose hunters may take one bull moose from September 10-20 or December 10-31. 5 AAC 81.320(9)
15. In Part of Unit 18 the season runs from September 1 to December 31. The bag limit is one bull. 5 AAC 81.320(9)

16. Moose hunting in 19A is from September 1-20 and November 1-30. The bag limit is one bull. 5 AAC 81.320(9)
17. Unit 19B and 19C moose hunters may bag one bull during the period September 1 to October 10. 5 AAC 81.320(9)
18. In Unit 19D the moose season spans the entire months of September and November. The bag limit is one bull. 5 AAC 81.320(9)
19. In part of Unit 21 the season runs September 10-30 and November 1-30, with a one bull bag limit. 5 AAC 81.320(9)
20. In one part of Unit 22 the season runs August 1 to March 31 with a one moose bag limit. Antlerless moose may be taken by permit only, the permits being available in Nome. 5 AAC 81.320(9)
21. In a second part of Unit 22, the season is August 1 to November 30 with the same bag limit and permit stipulations as 20 above. 5 AAC 81.320(9)
22. The third part of Unit 22 has a season spanning August through January with the same bag limit and permit stipulations as 20 above. 5 AAC 81.320(9)
23. Unit 23 moose hunters may hunt during the months August through December and may take one moose. Antlerless moose may be taken by permit only, and the permits are available only in Kotzebue. 5 AAC 81.320(9)
24. In part of Unit 24, moose hunting runs September 10-30 and November 1-30. The bag limit is one bull. 5 AAC 81.320(9)
25. Unit 26 moose hunters may take one bull from September 10-December 31. 5 AAC 81.320(9)
26. Fox hunters in Units 9 and 17 may take Arctic fox without limit from December 1 to March 15. 5 AAC 81.330(3)
27. With the exception of Chugach State Park, red squirrel may be taken without limit at any time of year. 5 AAC 81.330(14)
28. In Units 1-5, wolves may be taken without limit at any time of year by hunters. 5 AAC 81.320(15)
29. Unit 23, 24, and 26 hunters may take wolves without limit from August 10 to April 30. 5 AAC 81.320(15)
30. Grouse seasons run from early fall to late winter in most parts of the state with bag limits of 15 per day, except in Southeast Alaska where the limit is 5. 5 AAC 81.340(1)

31. Hare seasons in the Interior/Arctic are never closed and there is no limit. In southeast Alaska, the season runs from September 1 to the last day of April. The limit there is five per day. 5 AAC 81.340(2)

32. Ptarmigan hunters may take 20 birds per day (except in Chugach State Park where the limit is 10). Seasons in rural areas run from early August till late winter. 5 AAC 81.340(3)

33. Porcupines may be taken at any time without limit statewide except in Chugach State Park, where the season is closed. 5 AAC 81.350(1)

FISHING: COMMERCIAL AND SUBSISTENCE FISHING REGULATIONS

A. Statewide

1. There is no use fee (permit or license) associated with subsistence fishing (regulation).
2. Most traditional types of gear can be used for subsistence fishing (regulation).
3. Salmon and halibut may only be taken for subsistence by State residents (regulation).
4. There are fewer subsistence fishing regulations compared to commercial fishing regulations (10 versus 57 equivalent pages in the 1978 regulation booklet).

B. Arctic-Yukon-Kuskokwim Region (regulations and policies that generally apply to the State north of Bristol Bay and the Alaska Range where approximately 75 percent of the statewide subsistence harvest is made).

1. Subsistence fishing permits are not required for the majority of the intensive use subsistence fishing areas except adjacent to Nome, Fairbanks and the haul road crossing of the main Yukon River (regulation).
2. There are no restrictions on harvest or seasons for most species including salmon except adjacent to Nome, Fairbanks and the haul road crossing of the main Yukon River (regulation).
3. Commercial fishermen may retain any portion of their catch made during open commercial fishing periods for subsistence use. Commercial fishermen may continue to subsistence fish before and after the commercial fishing seasons with a few exceptions (regulation).
4. The use of a line attached to a rod or pole, when fished through the ice, is considered a method of subsistence fishing (regulation).
5. Conservative management of the commercial salmon fishery is required due in part to the need to provide for both upriver spawning and subsistence fishing requirements (policy in 1978 Management Plans).
6. Due to the inherent inefficiency in harvesting and processing associated with some subsistence fisheries, a relatively large fish population must be available for a optimum harvesting (unwritten policy).

4. Commercial fishing during July, when Kobuk River stocks are present, is intensively monitored to insure that spawning and subsistence fishery requirements are met. A catch per unit effort of less than 2.5 when effort is more than 100 boats during the early portion of the run, indicates a smaller than average run and the need for commercial fishing restrictions (policy in 1978 Management Plan).
5. Regulations and policies referenced in B, above.

Other Species

1. There are no subsistence fishing restrictions except that gear must be identified and cannot block waterways (regulation).
 2. Commercial fishing for sheefish is authorized by permit only and is restricted to a 25,000 pound quota (3,000 to 4,000 fish) from Hotham Inlet and Selawik Lake only (policy and permit stipulations).
 3. Commercial fishing for char, whitefish, and other freshwater species (except sheefish) is prohibited (unwritten policy).
 4. An earlier closure of the commercial salmon fishery has been implemented to reduce the incidental capture of Arctic char. The season in former years continued through late September and now closes August 31 (regulation).
 5. Regulations and policies referenced in B, above.
- E. Port Clarence Area: That portion of the A-Y-K region between the latitudes of Cape Douglas and Cape Prince of Wales.

Salmon

1. Commercial fishing prohibited due to relatively small runs and subsistence fishing importance (regulation).
2. Subsistence fishing can occur without restriction except during 7/1-8/15 when 5 days/week fishing allowed for sockeye salmon conservation reasons. Also gear must be identified and cannot block waterways and permits required for the Pilgrim River drainage (regulation).
3. Regulations and policies referenced in B, above.

Other Species

1. There are no restrictions except gear must be identified and waterways cannot be blocked, (regulation).
 2. Regulations and policies referenced in B, above.
- F. Norton Sound Area: That portion of the A-Y-K region between the latitudes of Canal Pt. light (near St. Michaels) and Cape Douglas including St. Lawrence Island.

Salmon

1. Subsistence fishing outside the described commercial fishing boundaries (except the Nome subdistrict) may occur without restriction except that gear must be identified and cannot block waterways. Permits stipulating harvest and gear restrictions required for Nome subdistrict (regulation).
2. Unlicensed commercial fishermen may fish for subsistence seven days a week within the commercial fishing boundaries (except the Nome subdistrict) (regulation).
3. Commercial fishermen may subsistence fish before and after the commercial fishing season and during the open commercial fishing periods when the season is in progress (regulation).
4. If the number of subsistence fishing permits issued for the Nome subdistrict exceeds 100 by July, a reduction of commercial fishing time will be considered (policy in 1978 Management Plan).
5. The commercial chum harvest for the Nome subdistrict should not be allowed to exceed 5,000 to 7,000 fish unless a strong run is indicated. If the commercial fishery is closed, subsistence fishing normally will be allowed to continue by emergency order for four days a week fishing if escapements are not impaired (policy in 1978 Management Plan).
6. Commercial fishery restricted to areas adjacent to spawning areas to minimize interception of stocks bound for other areas (regulation).
7. Regulations and policies referenced in B, above.

Other Species

1. There are no subsistence fishing restrictions except that gear must be identified and cannot block waterways (regulation).
2. Commercial fisheries are authorized by permit only with strict stipulations to insure that brood stock and subsistence fishing are not seriously affected (regulation and policy).
3. Regulations and policies referenced in B, above.

- G. Yukon Area: that portion of the A-Y-K Region between the latitudes of the westernmost point of the Naskonat Peninsula and Canal Point light near St. Michaels.

Salmon

1. In the intensive commercial fishing areas, both commercial and subsistence fishermen may fish for subsistence only during periods open to commercial fishing, which ranges from two to seven days a week depending on the species, area, and current status of the run. In areas where commercial fishing is prohibited, for example Koyukuk River, Innoko River, Tanana River upstream from the Salcha River mouth, etc., subsistence fishing may occur seven days a week (regulation).
2. Subsistence fishing (by commercial and subsistence fishermen) can occur before and after the commercial fishing season in most portions of the drainage (regulation).
3. Subsistence fishing in the lower Yukon River is open seven days a week after August 20 if the commercial salmon season is closed (regulation).
4. Special subsistence fishing openings may be announced by emergency order after August 10 in the lower Yukon River during prolonged closures of the commercial fishing season (policy in 1978 Management Plan).
5. Commercial fishing is regulated on the assumption that a harvestable surplus of salmon is available after providing for spawning and subsistence utilization requirements (policy in 1978 Management Plan).
6. Subsistence fishermen in several areas are exempt from commercial fishing requirements of using small mesh gear after various dates later in the season (regulation).
7. Generally, commercial fishing time has been reduced in recent years commensurate with increased effort and efficiency in order to fulfill upriver spawning and subsistence utilization requirements. Reduction in weekly commercial fishing periods results in spreading the harvest throughout the run and reduces the possibility of overharvesting run segments vital to upriver spawning and subsistence needs (policy in 1978 Management Plan).
8. The sale of roe from subsistence caught salmon was prohibited in 1978 after a four year trial period. It was apparent that introduction of a profit incentive was resulting in an increase in subsistence fishing abuses which eventually would have required severe restriction of this fishery (regulation).

9. Subsistence fishing is prohibited adjacent to the pipeline haul road north of the Yukon River. This prevents the development of a new nontraditional subsistence fishery along this new access route, which would have placed additional fishing pressure on salmon and other species currently being utilized in downriver traditional fisheries (regulation).
10. Commercial summer chum season in Tanana River re-opened only if subsistence catches appear to be average to above average (policy in 1978 Management Plan).
11. Commercial fishermen may not fish more than one type of gear at a time while subsistence fishermen are unrestricted (regulation).
12. Several locations in the upper Tanana near Fairbanks are closed to subsistence fishing; however, whitefish and suckers may be taken by permit designating restrictive measures for protection of other species (regulation).
13. Although the main Tanana River is closed to subsistence fishing between the Salcha and Gerstle Rivers, salmon may be taken after November 20 in recognition of a long standing carcass fishery in the vicinity of Richardson Highway bridge and in the Delta River (regulation).
14. In the main Yukon River, between the Rodo and Nowitna Rivers, fish other than salmon may be taken by permit during 6/15-7/15 (regulation).
15. Regulations and policies referenced in B, above.

Other Species

1. For species inhabiting freshwater drainages, there are generally no subsistence fishing restrictions except: a) weekly closures of the commercial salmon fishing season; b) identification of gear; c) blocking of waterways with fishing gear; and d) some stream closures in the Fairbanks area (regulation).
2. There are no subsistence fishing restrictions for marine species except that fishing gear must be identified and cannot block waterways (regulation).
3. Commercial herring fishing is prohibited in areas where subsistence fishing occurs (regulation).
4. Regulation and policies referenced in B, above.

- H. Kuskokwim Area: that portion of the A-Y-K Region between the latitudes of Cape Newenham and the westernmost point of the Naskonat Peninsula, including Nunivak and St. Matthew Islands.

Salmon

1. The commercial fishing season in the lower Kuskokwim River is delayed until the early portion of the run is distributed throughout the fishery, which provides for improved escapements and uninterrupted subsistence fishing (policy in 1978 Management Plan).
2. Subsistence fishing is allowed five to seven days a week compared to commercial fishing time of only 12 to 72 hours a week depending on the subdistrict, species, and current status of the run (regulation).
3. If the salmon returns are small, the last action taken to ensure escapements will be reductions in subsistence fishing time (policy in 1978 Management Plan).
4. There are no harvest restrictions placed on subsistence fishing compared to commercial fishing harvests which are controlled by either quota regulations or a guideline harvest policy (regulation and policy in 1978 Management Plan).
5. The total chum salmon harvest (commercial and subsistence) should not exceed 400 thousand fish except during years of exceptional abundance. To ensure adequate fish for subsistence purposes, commercial catches should be maintained at 150-200 thousand fish (policy in 1978 Management Plan).
6. Kuskokwim River upstream of Akiak is more subsistence oriented and therefore commercial fishery is restricted to a limited quota system (regulation).
7. Commercial chum salmon fishery in lower Kuskokwim River is limited to a small area downstream of Napakiak to ensure that upriver subsistence needs are met (regulation).
8. Subsistence fishing (by both commercial and subsistence fishermen) can occur seven days a week both before and after the commercial fishing season (regulation).
9. The sale of roe from subsistence caught salmon was prohibited in 1978 after a four year trial period. It was apparent that introduction of a profit incentive was resulting in an increase in subsistence fishing abuses which eventually would have required severe restriction of this fishery (regulation).
10. Salmon may be taken for subsistence purposes by spear in the Holitna River drainage (regulation).
11. Regulation and policies referenced in B, above.

CORRECTION

**THIS DOCUMENT
HAS BEEN REPHOTOGRAPHED
TO ASSURE LEGIBILITY**

9. Subsistence fishing is prohibited adjacent to the pipeline haul road north of the Yukon River. This prevents the development of a new nontraditional subsistence fishery along this new access route, which would have placed additional fishing pressure on salmon and other species currently being utilized in downriver traditional fisheries (regulation).
10. Commercial summer chum season in Tanana River re-opened only if subsistence catches appear to be average to above average (policy in 1978 Management Plan).
11. Commercial fishermen may not fish more than one type of gear at a time while subsistence fishermen are unrestricted (regulation).
12. Several locations in the upper Tanana near Fairbanks are closed to subsistence fishing; however, whitefish and suckers may be taken by permit designating restrictive measures for protection of other species (regulation).
13. Although the main Tanana River is closed to subsistence fishing between the Salcha and Gerstle Rivers, salmon may be taken after November 20 in recognition of a long standing carcass fishery in the vicinity of Richardson Highway bridge and in the Delta River (regulation).
14. In the main Yukon River, between the Rodo and Nowitna Rivers, fish other than salmon may be taken by permit during 6/15-7/15 (regulation).
15. Regulations and policies referenced in B, above.

Other Species

1. For species inhabiting freshwater drainages, there are generally no subsistence fishing restrictions except: a) weekly closures of the commercial salmon fishing season; b) identification of gear; c) blocking of waterways with fishing gear; and d) some stream closures in the Fairbanks area (regulation).
2. There are no subsistence fishing restrictions for marine species except that fishing gear must be identified and cannot block waterways (regulation).
3. Commercial herring fishing is prohibited in areas where subsistence fishing occurs (regulation).
4. Regulation and policies referenced in B, above.

- H. Kuskokwim Area: that portion of the A-Y-K Region between the latitudes of Cape Newenham and the westernmost point of the Naskonat Peninsula, including Nunivak and St. Matthew Islands.

Salmon

1. The commercial fishing season in the lower Kuskokwim River is delayed until the early portion of the run is distributed throughout the fishery, which provides for improved escapements and uninterrupted subsistence fishing (policy in 1978 Management Plan).
2. Subsistence fishing is allowed five to seven days a week compared to commercial fishing time of only 12 to 72 hours a week depending on the subdistrict, species, and current status of the run (regulation).
3. If the salmon returns are small, the last action taken to ensure escapements will be reductions in subsistence fishing time (policy in 1978 Management Plan).
4. There are no harvest restrictions placed on subsistence fishing compared to commercial fishing harvests which are controlled by either quota regulations or a guideline harvest policy (regulation and policy in 1978 Management Plan).
5. The total chum salmon harvest (commercial and subsistence) should not exceed 400 thousand fish except during years of exceptional abundance. To ensure adequate fish for subsistence purposes, commercial catches should be maintained at 150-200 thousand fish (policy in 1978 Management Plan).
6. Kuskokwim River upstream of Akiak is more subsistence oriented and therefore commercial fishery is restricted to a limited quota system (regulation).
7. Commercial chum salmon fishery in lower Kuskokwim River is limited to a small area downstream of Napakiak to ensure that upriver subsistence needs are met (regulation).
8. Subsistence fishing (by both commercial and subsistence fishermen) can occur seven days a week both before and after the commercial fishing season (regulation).
9. The sale of roe from subsistence caught salmon was prohibited in 1978 after a four year trial period. It was apparent that introduction of a profit incentive was resulting in an increase in subsistence fishing abuses which eventually would have required severe restriction of this fishery (regulation).
10. Salmon may be taken for subsistence purposes by spear in the Holitna River drainage (regulation).
11. Regulation and policies referenced in B, above.

Other Species

1. Commercial fishing for sheefish is prohibited except those taken incidentally during a legal commercial fishery targeting on other species (policy and commercial fishing permit stipulations).
 2. Commercial fishing for other freshwater species is authorized by special permit only with stipulations designed to minimize adverse effect on subsistence fishing. For example, commercial fishing for whitefish and other freshwater species is prohibited in the Johnson River drainage (policy and commercial fishing permit stipulation).
 3. There are no subsistence fishing restrictions for these "other species" except that fishing gear must be identified and cannot be used to block a waterway (regulation).
 4. Commercial fishing for herring in the Nelson Island-Etolin Strait area is prohibited (regulation).
 5. Commercial fishing for herring in Goodnews Bay and Security Cove district is subject to relatively small guideline harvest levels (regulation) and intensive monitoring to insure that harvestable surpluses are present.
 6. Regulation and policies referenced in B, above.
- I. Alaska Peninsula: all waters from Unimak Pass to Cape Menshikof, then easterly to Kupreanof Point.

Salmon

1. Salmon may be taken for subsistence at any time without a permit, except that from June 1 to 48 hours after the close of the commercial season a permit is needed (regulation).
2. Salmon may be taken by any form of legal gear, except that set gill nets may not exceed 100 F in length (regulation).

Other Finfish

There are no regulations restricting subsistence fishing for non-salmon species.

Shellfish

Shellfish may be used for subsistence virtually without regulation, except for a few regulations pertaining primarily to commercial license or vessel holders.

- J. Aleutian Islands Area: all waters in the Aleutian Islands west of, and including, Unimak Pass.

Salmon

1. Salmon may be taken at any time without a permit, except that from June 1 to 48 hours after the close of the commercial season a permit is needed in the Akutan and Unalaska districts. There is no closed season on salmon taken for subsistence purposes in Umnak and Adak districts (regulation).
2. Salmon may be taken by all forms of legal gear (regulation).

Salmon and Other Finfish

1. There are no regulations restricting subsistence use for non-salmon.
2. All waters are open to subsistence fishing except that Unalaska Lake, the streams feeding it and the exit stream and within 500 yards of its mouth are closed to subsistence fishing (regulation).

Shellfish

There are virtually no restrictions on subsistence use of shellfish, except for regulations dealing primarily with commercial operations.

- K. Chignik Area: all waters on the south side of the Alaska Peninsula between the southern entrance to Imuya Bay near Kilokak Rocks and Kupreanof Point.

Salmon

1. Salmon may be taken for subsistence purposes at any time except that from June 1 to 48 hours after the close of the commercial salmon season a permit is required (regulation).
2. Salmon may be taken for subsistence purposes in any location by net, except above the Department counting tower or weir site in the Chignik River, Chignik Lake, Black Lake, and all tributaries of these lakes (regulation).

Other Finfish

There are no regulations restricting subsistence fishing for non-salmon species.

- L. Kodiak Area: all waters from the southern entrance of Imuya Bay near Kilokak Rocks to Cape Douglas, including Kodiak, Afognak, and adjacent islands.

Salmon

Salmon may be taken by permit for 15 hours daily from May 1 until November 30 within designated areas, except that commercial salmon net gear and registered salmon purse seine vessels may not be used to take salmon for subsistence purposes from June 1-September 15 (regulation).

Other Finfish

Halibut may be taken for subsistence purposes at any time between March 1-October 31 (regulation).

Shellfish

Subsistence fishermen may take shellfish with little restriction, except for regulations dealing primarily with commercial operations.

FISHING: SPORT FISHING REGULATIONS

Arctic-Yukon-Kuskokwim Region

1. Very liberal bag limit. A person could take daily 15 total of grayling, trout, and char simply by having a 25¢ or regular sport fishing license. Possession limit is 2 daily bag limits. Ten sheefish and 15 salmon daily can be taken with a possession limit of twice this amount (regulation).
2. No bag limit or season on northern pike except near Fairbanks (regulation).
3. No limit on burbot or whitefish (regulation).
4. Whitefish may be taken by spear without limit January 1-March 31 and September 1-December 31 (regulation).
5. Restrictive salmon regulations in Tanana drainage near Fairbanks to protect traditional downstream fisheries (regulation).
 - a. only one king salmon permitted
 - b. total salmon bag limit
 - c. Chena River above Little Chena closed to sport fishing
 - d. Goodpasture River drainage closed to salmon fishing
 - e. Salcha River closed above Redmond Creek.
6. Other restrictive measures to protect traditional subsistence fishery (regulation):
 - a. only 2 sheefish can be taken in the Tanana drainage
 - b. a five mile strip along the pipeline corridor (Haul road) is closed to sport fishing
 - c. Salmon Lake (Seward Peninsula) and tributaries closed to taking of salmon.
7. There are no closed seasons or bag limits in salt water (regulation).

APPENDIX V

NEW REGULATIONS, POLICIES AND STRATEGIES
FOR THE MANAGEMENT OF SUBSISTENCE USE

NEW REGULATIONS, POLICIES AND STRATEGIES FOR THE MANAGEMENT OF SUBSISTENCE USE

The following partial list of recommended guidelines relating to the management of subsistence use is presented in outline form. It is hoped that further discussions between the Boards, public and department will result in a more comprehensive set of guidelines, many of which can be transformed into workable regulations and policies.

1. The degree of harvest regulation and management required for any species or stock is based on biological productivity, cumulative demand and utilization of all competing user groups and vulnerability for overharvesting. Harvest regulation may be unnecessary or very minimal if harvestable surpluses of certain species or stocks are available. Several stocks that may qualify in this respect in certain areas include whitefish, pike, blackfish, many Bering Sea marine fishery resources, rabbits and hares, squirrels, etc.
2. Some species or stocks should be taken only under commercial and/or recreational regulations based on the following considerations:
 - a. the pursuit of fish and game primarily to satisfy recreational or commercial needs should not be accomplished under subsistence regulations which diminish the integrity of traditional subsistence use and the ability of the State to demonstrate a preference for this use.
 - b. some species or stocks have become highly important to recreational and/or commercial users partially due to no or minimal demand by subsistence users.
 - c. harvesting under recreational and commercial use regulations will partially fulfill subsistence needs; although a license is required (25¢ recreational use license for low income persons), recreational regulations may still permit liberal seasons and bag limits for some stocks.
 - d. management of a particular stock may be circumvented by allowing harvesting under two or more regulatory schemes, e.g. commercial, subsistence, and sport fishing regulations.
 - e. species or stocks having low productivity cannot adequately sustain subsistence needs and harvesting is best controlled under recreational regulations.
 - f. subsistence needs can be sustained by use of other species or stocks.

A partial listing of species or stocks that may be considered for harvesting under only commercial and/or recreational regulations, recognizing that legitimate subsistence uses do occur in specific areas and must be accommodated, is presented below:

- * king and coho salmon in Southeastern Alaska
- * hatchery releases of all fish species in lakes having no access to the ocean

- * rainbow-steelhead trout
- * grayling
- * lake trout, Arctic char, and Dolly Varden trout in lakes
- * many marine finfish and shellfish species.

3. Permit only subsistence and/or recreational harvesting of species or stocks not being used commercially. Commercial harvesting may be allowed but only through formal proposals and action by the Board of Fisheries. Present regulations allow commercial fishing for many species without initial restrictions being imposed. Examples include sheefish, whitefish, and many marine finfish species.
4. Subsistence use levels should be maintained at the levels of such uses occurring during the most recent five or ten year period. The Boards of Fisheries and Game should maintain flexibility by periodically examining changes in social or economic conditions which may warrant allowing an increase in legitimate subsistence uses.
5. New nontraditional subsistence use activities should not be allowed. Subsistence uses should be confined to areas and/or species and stocks where such use has occurred during recent years.
 - a. if allowed, such subsistence use should be given secondary preference to other traditional uses currently being made.
 - b. subsistence harvesting should not be permitted adjacent to new access points (roads, airports), if traditional subsistence uses do not exist in these areas.
6. Consider restrictions on the use of some species or stocks under the following conditions:
 - a. fish that are fed to sled dogs which are not utilized to provide transportation associated with subsistence pursuits.
 - b. fish that are utilized as bait for trapping and commercial fishing.
 - c. prohibit commercial fishermen in some areas from taking subsistence fish during the entire season or portions of the season.
 - d. under a and b consider restricting use of those species or stocks having high demand as human food (salmon, halibut, rainbow trout, etc.).
7. Restrict some non-traditional subsistence harvesting methods, for example:
 - a. prohibit use of purse seines, trawls, diving gear, power troll gear, hydraulic clam digger, etc.
 - b. prohibit use of road vehicles and aircraft in taking or transporting subsistence caught fish and game.
8. Only state residents may subsistence fish (similar to statutes regarding subsistence hunting).
 - a. presently nonresidents are allowed to subsistence fish for all species except salmon and halibut.

- b. another option is to allow nonresidents to take fish for subsistence purposes only under the terms of a permit to be issued to those persons intending to reside in the state and in areas where subsistence is given high priority.
9. Preference for subsistence use, now mandated by law, places a greater responsibility on subsistence users to:
- a. accept the sustained yield principal of fish and wildlife management.
 - b. provide access to subsistence resources for required biological study.
 - c. provide timely and accurate harvest information. The importance of accurate documentation of harvests must be emphasized if subsistence preferences are to be given. For some species and stocks in certain areas this may require collection of harvest data through the implementation of a permit or registration system.
 - d. participate in non-wasteful harvesting and processing.
10. The regulation and necessary restriction of subsistence harvesting of certain species and stocks in specific areas is required for the following reasons to prevent overharvesting:
- a. increased mobility and harvesting efficiency of subsistence users; for example, commercial fishing nets, boats and motors are commonly used in many areas and snow machines are utilized in transporting fishermen to and from winter fishing grounds.
 - b. The evolution away from a nomadic life style has resulted in more continuous intensive use of stocks adjacent to many rural villages.
 - c. concentrations of fish and game seasonally and in certain areas make some stocks vulnerable to overharvesting.
 - d. effects of increased losses of fish and game harvested associated with modern gear; for example, unattended nylon gillnets continue to kill fish while the old natural fiber nets rotted away within a short period of time.
 - e. increased harvesting of fish and game resources; for example, salmon, for sale and export that are also used for subsistence. Often the same individual is dependent upon both commercial and subsistence fishing.
 - f. the need to minimize the illegal sale of subsistence caught fish when both commercial and subsistence fishing occurs simultaneously in the same area.
 - g. permit requirements to obtain timely and accurate subsistence harvest information for intensively used fish and game resources.
11. All species of fish captured incidentally in legal subsistence fisheries targeting on other species may be legally taken and possessed (including grayling). Certain important subsistence species taken incidentally by commercial fishermen should not be allowed to be sold.

12. Implement a program to minimize wastage of subsistence taken fish by:
 - a. an I & E program.
 - b. regulatory requirement for retrieving fishing gear (gillnets, traps, etc.) at periodic intervals during the fishing season.

13. Industrial development projects should be planned to minimize their impact on local fish and game resources and their utilization. Maximum public input should be sought.

APPENDIX VI
CRITERIA FOR DETERMINING SUBSISTENCE USE
ELIGIBILITY AND PREFERENCE

CRITERIA FOR DETERMINING SUBSISTENCE USE ELIGIBILITY AND PREFERENCE

Based on the intent of SL 151, the Task Force recommends that the Boards of Fisheries and Game carefully examine several criteria that may be used to determine subsistence use eligibility and preference. These criteria may be used in the following manner: 1) to distinguish subsistence users from other users; 2) to give preference to those subsistence users most dependent on fish and game resources, especially under conditions of resource depletion or when the demands of all user groups exceed sustained resource yield; and 3) the use of specific criteria in concert with specific subsistence regulations will result in a defacto regional definition of subsistence.

The four major criteria or characteristics are:

1. Customary and traditional use.
2. Customary and direct dependence upon the resource as the mainstay of one's livelihood.
3. Residency.
4. Availability of alternative resources.

It is further recommended that the Boards of Fisheries and Game, after considering public and department input, use a combination of these criteria in their consideration of subsistence eligibility and preference. Also, in recognition of regional differences in subsistence uses and dependencies, the Boards should consider using different combinations of these criteria for different areas.

Each of these four major criteria are divided into several components which are explained below in detail. The chronological listing of major criteria and components is not indicative of their relative importance. However, the Task Force did subjectively rate the relative importance of each component accordingly:

***High Consideration
**Medium Consideration
*Low Consideration

1. Customary and Traditional Use:

This criterion, which is not directly related to need, takes into account family and individual involvement in subsistence activities. Personal or family consumption is an integral part of customary and traditional use.

a. *** Family involvement relative to time and space:

The fact that a family has been using the resources for personal use for a long period of time and in an area close to where they have lived is the main theme of this criterion. The cultural aspects of subsistence are involved here.

- b. *** Residency in fishing, hunting, and gathering oriented community:

This criterion simply gives added preference to people living in a location or community regardless of size where subsistence living is the general mode of life. For example, North Pole, Ninilchik, and Palmer would be less eligible than Kotlik, Selawik and Huslia.

- c. *** Fish and game utilization for direct consumption or barter:

This criterion considers use of the resource in addition to the harvesting of the resource. People utilizing the resource for direct consumption would be given high preference.

- d. *** Does not use airplane:

The Task Force felt use of airplanes for subsistence activities should not be allowed. There would be just too many abuses, also airplanes are not traditional. Airplanes would place a much greater strain on resources.

Since the intent of the legislature seemed to be that "customary and traditional" included the traveling over the land and water or kinship to the land, then airplanes simply did not fit in.

The committee realized that there may now be a few occasions where an airplane is presently used for subsistence (Dillingham residents, Fairbanks residents using airplane to subsistence fish for their dogs in the Yukon River). It was not resolved as to whether this use should be dissolved.

- e. ** Individual involvement relative to time and space:

This is similar to family involvement but refers to individuals hunting, fishing or trapping in the same area for a long period of time. If only an individual performed the activity it would be given less weight than if the family was involved.

- f. ** Does not use road vehicle to harvest subsistence resource:

This criterion was given less weight than non-use of airplanes, but there also was not full agreement as to its' inclusion. Some felt that if you could afford a \$10,000 4-wheel drive rig you didn't need to be subsistence fishing or hunting.

The group did agree that there was some subsistence fishing or hunting by vehicle (Barrow, Nome, Bristol Bay area, Minto, Northway) occurring now.

- g. ** Community size:

This criterion gives subsistence preference inversely proportional to community size. Single individuals or families living outside a community boundary would also be taken into consideration here.

2. Customary and direct dependence upon the resource as the mainstay of one's livelihood:

This major criterion refers to need.

a. *** Percent subsistence dependence (household and village):

This criterion was considered very important by all and some members consider it the most important criterion. Past recommendations by the Board of Fish and Game have been to allocate subsistence resources on the basis of need.

Percent subsistence dependence means that:

1. The percent of the diet of the family (household) that is made up of subsistence foods.
2. The percent of the diet of the community that is made up of subsistence foods.

b. *** Village and/or regional adjusted cash income:

Instead of using family income, this criterion takes into account what the village or region average income is in relationship to its purchasing power. It is a type of a regional cost of living index. The lower the income the greater priority the village or region would get.

c. *** Household adjusted cash income:

The household income, taking into account what it buys, is used here to determine subsistence preference. The lower the "real income is", the greater the subsistence priority the household would have.

d. ** Community size characteristics:

This takes into account needs of the entire community, is the entire community dependent upon subsistence, is this a commercial fishing community or a subsistence fishing community, is this a small village with no jobs and great dependence on subsistence or is it community medium size with only moderate independence on subsistence?

Basically small subsistence dependent communities would have more claim to the subsistence resource.

3. Residency:

a. *** Residency in area:

Simply stated if one lives in the area where the harvesting is to take place they have a greater claim than someone who lives a distance away.

b. ** Duration of residency:

The longer one has lived in the area the more eligible he is for the subsistence resource. Because of local hire law being struck down the Task Force did not put a time frame on this.

c. * Distance from residence to resource:

The closer one lives to the resource the more claim he would have to it during periods of allocation.

4. Alternative Resources:

This major criterion refers to subsistence preference when other resources are not available. If the people could satisfy their subsistence requirements through other available sources (store food, other fish and game resources, cash jobs, etc.) then the critical wildlife resources in question might not have to be allocated.

a. ** Availability of other fish and game resources:

If a certain wildlife resource (i.e. moose) is in low abundance in an area so that allocation is necessary, but levels of the other resources are high (i.e. salmon and whitefish), then subsistence needs could be met by taking these more abundant resources. This need could be met by barter.

b. ** Availability of processed food:

If processed food was available and people had means to purchase it, then the subsistence preference would be given to those who did not have processed food available or did not have the means to purchase it.

c. ** Local cash opportunities:

If local cash opportunities are available then that person would have less subsistence preference than person to whom these opportunities are not available. If a person commercial fished or had a regular job then he would have less preference than a person who only subsistence fished.

d. ** Cost of living index:

This criterion relates available money (job, welfare, commercial fishing, trapping) to what it will buy or purchasing power. Those eligible people with the lowest purchasing power will have preference.

e. ** Takes fish and game by recreational or commercial pursuits:

This criterion is another alternative to the resource allocation scheme. A person could fulfill this "personal use" requirement

by taking fish or game with a sport fishing or hunting license. He would also fulfill his requirements by saving some of the fish taken during the commercial fishery, eating some of the walrus meat while hunting for ivory or consuming meat of animals trapped.

Implementation methods

In order to implement a subsistence eligibility - preference system, it will be necessary to determine: 1) when a fish or game resource is depleted to the extent that special methods of allocating harvests are necessary; 2) how the harvest can be equitably distributed to all user groups; and 3) who will administer the program of harvest allocation.

Several options or considerations for implementing a system to determine subsistence eligibility and preference are outlined below:

1. In many instances subsistence uses can be accommodated by using the current regulatory system to alter seasons, bag limits, harvest methods and means, etc. Many species and stocks are sufficiently plentiful so that subsistence uses can be easily accommodated without the need for any special harvest allocation schemes;
2. A "check list" system whereby persons to qualify would simply have to meet all or a majority of the pertinent eligibility criteria;
3. A more elaborate point system, similar to limited entry for commercial fisheries, but based on the aforementioned criteria;
 - a. point system could be applied to individuals, villages or a geographic area.
 - b. persons with greatest number of points could receive larger share of allowable harvest;
4. General permits may be issued to facilitate identification of all eligible subsistence users.
5. Special permits could be issued to subsistence users giving them special preference in designated areas or zones where a particular resource is depleted. These special permits would be issued for the taking of specific stocks and only for the duration of stock depletion.
6. Administration of a system to determine subsistence eligibility and preference could be accomplished by one or more of the following:
 - (1) Boards of Fisheries and Game.
 - (2) Regional councils, advisory committees.
 - (3) Commissioner (staff).
 - (4) Special commission.

(5) Local government unit.

(6) Combination of above.

Once guidelines have been established to determine resource depletion, perhaps the administration of the allocation process could best be handled by the subsistence section of Alaska Department of Fish and Game in cooperation with the local government structure.

Special Considerations and Problems

A system of permit issuance, especially if applied to all eligible subsistence users would be very expensive and time consuming as permits would have to be distributed throughout more than 150 communities, many of which are in remote locations. A limited entry system should be utilized as a last resort for the same reasons.

The current lack of information relating to the status of fish and game resources including population sizes and harvests, limits the options available for giving subsistence preferences. Subsistence preference cannot be adequately addressed until accurate harvest information is obtained for individuals in all user groups. Documentation of subsistence needs and uses is a major role of the new subsistence section, but it will be several years before this information can be obtained for all major species and stocks.

The Task Force felt that the question of who would determine resource depletion was a very important one. However, some system must be established which would take into account the biological facts of the abundance and allowable harvest of the species in question. The fact of resource depletion must be established before the allocation process can take effect.

The Task Force felt that a combination of input from the following would be helpful in determining species depletion: 1) Local residents; 2) Subsistence Section of Alaska Department of Fish and Game; 3) Game Division; 4) Sport Fish Division; 5) Commercial Fish Division.

Specific guidelines to determine resource depletion should be developed. Important aspects of these guidelines will be: 1) Information on present harvest by all user groups; 2) Population status of the species in question; 3) Maximum sustainable harvest of the species in question.

APPENDIX VII

STAFFING, DEPLOYMENT, AND OPERATION OF THE SUBSISTENCE SECTION

MEMORANDUM

TO [Commissioner Ronald O. Skoog
Alaska Department of Fish and Game
Juneau

DATE October 9, 1978

FILE NO

TELEPHONE NO

FROM Subsistence Task Force:
Ron Regnart, Fritz Kuhlmann,
Dick Bishop, Bob Pegau, Ken Alt,
Jim Raymond

SUBJECT Recommendations for the
organization and implementation
of the Subsistence Section

We are concerned that the integration of the new Subsistence Section below the headquarters level has not received sufficient attention. With a publicly announced October, 1978 implementation date, neither you or your headquarters staff have solicited regional or area staff input on this issue. The main element for our concern is that it should be recognized that the success or failure of the implementation of the Subsistence Section and the preference for legitimate subsistence uses will greatly depend on the "field program".

We have decided to submit our recommendations on this issue now so hopefully our input can be considered for inclusion in the FY 80 budget request (or supplemental FY 79 request).

I. Clerical Positions

Four, or 25 percent, of the 16 positions in the proposed table of organization for the Subsistence Section are located in Juneau and serve an administrative function only. Only two of these 16 positions are clerical in nature and both are located in Juneau. Twelve subsistence positions will be located in field offices and are joining 21 other authorized positions from the Divisions of Commercial Fisheries, Game, and FRED, totalling 33 positions. Only two of these 33 are clerical positions:

<u>Field Office</u>	<u>Comm. Fish.</u>	<u>Game</u>	<u>FRED</u>	<u>Subsis.</u>	<u>Total (Clerical)</u>
Bethel	3	1	0	2	6 (0)
Dillingham	3	1	2	2	8 (1)
Nome	2	5	0	2	9 (1)
Barrow	0	1	0	2	3 (0)
Kotzebue	1	1	0	2	4 (0)
Galena	0	1	0	2	3 (0)
Totals	9	10	2	12	33 (2)

No clerical assistance in field offices, where there is already an acute shortage, is being considered. Apparently this problem is not being addressed in the FY 80 budget request, which includes only the addition of single clerical positions in the Anchorage and Fairbanks offices.

There is ample justification to request these new positions due to the impact of subsistence legislation. Failure to do so in the FY 80 budget request presents the erroneous conclusion that these positions are not needed.

Recommendation: Obtain additional permanent clerical positions through shared costs with other management divisions as follows:

1. Bethel (fulltime, 12 months)
2. Dillingham (part time, 6 months)
3. Nome (full time, 12 months using 6 MM available Commercial Fish funding)
4. Barrow (part time, 6 months)
5. Kotzebue (full time, 12 months)
6. Galena (part time, six months)
7. Clerical assistance may be required for some of the proposed stations listed in II, below.

In order to accomplish securing of these positions several options are presented:

1. Transfer one position (Administrative Assistant I or Clerk Typist III) from Juneau to a field office location; consider creating two part time clerical positions for field offices and through shared costs with other divisions, two full time positions could possibly be obtained.
2. Request clerical positions in the FY 80 budget request or supplemental budget request to the FY 79 allocation.
3. Combination of (1) (2), above.

II. Distribution of Positions

There is a curious disregard for addressing the needs in the other regions of the state, including the upper Kuskokwim River, upper Yukon-Tanana Rivers, Copper River, and Southeastern Alaska. Due to its location, it appears that the Galena office may be responsible for the entire upper Yukon drainage including the Koyukuk, Tanana, Chandalar, and Porcupine Rivers, the upper Kuskokwim drainage, and the Copper River drainage!

Recommendations:

1. Station one position (probably Resource Specialist) in each of the following additional field stations: McGrath, Fort Yukon, Glennallen, and Juneau (regional office).
2. Station regional supervisor and clerical positions in Anchorage and Fairbanks offices (being requested in FY 80 budget).
3. Consider following options for accomplishing the above:
 - a. Redistribute existing positions as it is questionable that two positions are required at each of the field

offices listed in the table of organization. Based on the degree of subsistence dependence and/or close proximity of subsistence positions in adjacent field offices, a reduction in the subsistence staff seems reasonable in the following locations: Dillingham, Kotzebue, Barrow.

- b. Reclassify many of the subsistence positions to a lower pay range and use funds saved to establish additional positions or establish part time or seasonal positions using funds saved for the same purpose.
- c. Request additional positions through the budgetary process.
- d. Combination of (a), (b), and (c) above.

III. Supervision

Creation of a new "service" section involved with resource management and research within an agency that already has overlapping internal jurisdictions requires innovative organizational planning. Direct supervision of subsistence resource specialist positions that will be stationed from Dillingham to Barrow by a Juneau administrator is not in the best interest of the Department or the Subsistence Section. Juneau administrators will not have the time or the unique experience to give the necessary day to day supervision of resource specialist II's, that are being hired at the journeyman level. The senior regional and/or area staffs of the Management Divisions must be given some degree of supervisory authority over these positions.

Recommendations:

1. Existing regional supervisors (Nome, Fairbanks, Anchorage) should assist in the administration of the Subsistence Section Program until parallel regional supervisor positions in the Subsistence Section are budgeted for and obtained.
2. A "matrix" supervisory system must be worked out to insure management division input into subsistence section activities; Senior Management Division personnel in field offices should always exercise some supervisory control and/or technical input.
3. Some subsistence positions due to their location could be designated as primarily "fisheries" or "game" with shared supervision from the appropriate division. Other subsistence positions will have near equal "fish" and "game" responsibilities which would be a greater test of the matrix system.
4. Successful implementation of the Subsistence Section requires that the entire Department staff understand the program objectives and methods in addition to their own area of responsibility. Supervision is an important element, but even more important is the production of a comprehensive operational planning document that is developed through full staff input and is distributed to all "players".

IV. Budget

The Legislature provided \$802,900 for the Subsistence Section funding in FY 79 which was subsequently reduced to \$500,000 by the Governor. The original line item allocation was: Line 100-\$650.1; Line 200-\$19.6; Line 300-\$93.4; Line 400-\$4.5, and Line 500-\$35.3. Inadequate funding can not only limit the immediate effectiveness of the Subsistence Section, but could also eventually affect other Department programs.

Recommendations: A thorough line and subline item analysis of the \$500,000 allocation should be made immediately. Any required additional funding should be requested in the FY 80 budget request (now being prepared) or in a supplemental request to the FY 79 allocation. This analysis must take into account clerical and physical space requirements in addition to operating funds for required harvest surveys and other subsistence "research". There also may be a surplus of funds this fiscal year, since all positions may not be filled (or filled late) and the resultant surplus funding should be considered for acquisition of additional positions, physical space, and equipment.

V. Class Specifications for Subsistence Positions

The following minor changes should be made to the existing Fish and Game Technician series:

1. Experience as subsistence hunter and fisherman can be substituted.
2. Bilingual ability is necessary in only the Bethel area.
3. Another duty should be "assisting the Department staff in dissemination of information to the public regarding Department programs through use of various media, including meetings, radio, television, and newspapers."

Rewrite class specifications to more clearly explain the "duties" and "series definition" sections. Examples of confusing and awkward statements include: 1) what is meant by subsistence "research" versus "studies"; 2) what is meant by "gathering and evaluating government impact"; 3) "conducting research and assists in the assessment--of development projects" is also a Habitat Section responsibility. If this is the intent, then class specifications of the Fishery Biologist and Game Biologist series should be rewritten to also incorporate this language; 4) "Makes recommendations concerning field operations to regional supervisors". Which regional supervisors?

VI. Physical Space Requirements

Most field offices are already crowded and additional space will be required to accommodate the new subsistence positions. Because of the close inter-relationships between the Subsistence Section and the management divisions, it would be desirable that the same office space be utilized, which in many instances will require expansion of existing facilities.

Recommendations:

1. Additional capital construction and rental costs should be shared according to the number of personnel in each section or division.
2. The following capital construction projects have been submitted:
 - a. Bethel-\$20,000 to expand present office to accommodate new subsistence positions. (100% Subsistence Section share.)
 - b. Nome warehouse-\$75,000 for use by entire Department staff. (Subsistence Section share about 20%.)
 - c. Kotzebue-\$262,500 for construction of new office and warehouse. (Subsistence Section share about 20%.)
3. Additional office space is also required for Dillingham, Galena, and Barrow; also McGrath, and Glennallen if subsistence positions can eventually be stationed at these locations.

cc: Rosier, Pennoyer, Middleton, Lechner, Cantillon, Subsistence Task Force, Van Wyhe, Redick, Somerville, Vania, McMullen, D. Stewart, Moberly

John Stewart
Chief Accountant
ADF&G, Juneau

October 20, 1978

RR Ron Regnart, Regional Supervisor
Commercial Fisheries
Anchorage

Subsistence Section Budget
Estimate for FY 80

The enclosed budget estimate was prepared by my staff. Per our discussion, costs are estimated for 2 positions stationed in Bethel only.

Some features of this estimate that should be called to your attention follow.

Line 100 costs are, except for clerical support, related to harvest surveys that will be a function of the new section. The survey area includes the Yukon and Kuskokwim delta area, including the coastal villages, and perhaps Nunivak Island. In addition, surveys will be made in the upper Kuskokwim drainage, but not in the Yukon since that area will be covered by new positions stationed at Galena. Salary costs are based on the Anchorage pay scale.

Line 200 includes the estimated cost of a household move for 1 permanent to Bethel. This may not be applicable if the move is made in FY 79 and a turnover in the position does not occur.

Line 500 also includes equipment that may be purchased in FY 79. Discounting these would decrease the price, but they are included here for contingency purposes.

Needed new office and warehouse space in Bethel is not included as a cost here since our FY 80 CIP submission contains funding request for them.

Line 100

33,620

Yukon & Kuskokwim Subsistence Salmon Survey Costs		14,468
FT III 3.5 mo x 1307	4574	
OT 200 hrs x 12.06	2412	
Benefits @ 10.15%	709	
	<u>7695</u>	
FT II 3.5 mo x 1150	4025	
OT 200 hrs @ 10.62	2124	
Benefits @ 10.15%	624	
	<u>6773</u>	
Yukon & Kuskokwim Whitefish & Sheefish Surveys		7,406
FT II 4 mo x 1,50	4600	
OT 200 hrs. x 10.62	2124	
Benefits @ 10.15%	682	
	<u>7406</u>	
Other Areawide Subsistence Harvest Surveys (Game & Fish)		3,703
FT II 2 mo x 1150	2300	
OT 100 hrs x 10.62	1062	
Benefits @ 10.15%	341	
	<u>3703</u>	
Clerk Typist II		8,043
6 mo x 1217/mo	7302	
Benefits @ 10.15%	741	
	<u>8043</u>	

Line 200

16,070

Permanent Moving Expense:		
10,000 lbs x .50/lb.	5000	
10 days per diem	1050	
Permanent Travel		
Administrative, Bethel-Juneau		
4 trips @ 360	1440	
Advisory meetings, Bethel- Alakanuk, St. Marys, etc.		
10 trips @ 100	1000	
Village meetings, Bethel-Coastal & River Villages		
10 trips @ 100	1000	
Board meetings, Bethel-Anchorage		
2 trips @ 150	300	
Permanent Per Diem 75 x 50/day	3750	
Permanent Subsistence 30 x 21/day	630	

Line 200 (continued)

Temporary Travel, Anchorage- Bethel 6 rt @ 150	900
To & between villages, 10 @ 100/trip	<u>1000</u>
	16070

Line 300

20,350

Communication, long distance 12 mo @ 200/mo	2400
Postage	250
Utilities, 12 mo @ 50/mo	600
Repair/Maintenance, 12 mo @ 25/mo	300
Freight	600
Equipment rental-vehicles	2400
Air charter 100 hrs @ 140/hr	14000
Copying	<u>300</u>
	20850

Line 400

5,000

Clothing, hip boots, rain gear, parkas	500
Food, 15 MM @ 220/mo	3300
Outboard fuel	500
Outboard oil	200
Misc. office supplies	<u>500</u>
	5000

Line 500

12,300

1/2 T Pickup	6500
1 riverboat, 24 ft. aluminum	2500
1 75 hp outboard	1600
2 desks @ 300 each	600
3 chairs @ 100 each	300
1 file cabinet	200
Tape recorder	200
Emergency locator beacon	200
Desk calculator	<u>200</u>
	12300

Grand Total All Lines

37,340

APPENDIX VIII
PLANS FOR PUBLISHING SUBSISTENCE REGULATIONS

PLANS FOR PUBLISHING SUBSISTENCE REGULATIONS

The Subsistence Task Force recommends that all regulations pertaining to subsistence be removed from current texts and placed in separate booklets. These regulations should be presented in two forms: one codified and one informal. A codified booklet would satisfy judicial requirements, while a simplified version would aid the public in understanding various regulations.

A general outline has been attached to illustrate potential methods of presenting subsistence regulations. This outline provides for inclusion of applicable finfish, shellfish, and general provision regulations within a compact, logical framework. Using this outline as a guide, an attempt was made to fit a current regulatory scheme to the outline (attached). The Yukon area of the AYK region was chosen for the finfish portion of this exercise due to the complexity of its regulatory structure. In general, most applicable subsistence regulations could be taken almost verbatim from the current Commercial Fisheries codified text and fit within the broad framework of the outline. Difficulties were encountered in presenting subsistence regulations which were dependent upon commercial regulations; e.g. when subsistence fishing was allowed only during open commercial fishing periods.

A copy of an informational handout used on the Yukon River has been attached. This handout presents both commercial and subsistence information; however, it does illustrate a simplified alternative to the codified regulations. Of course, these handouts may be modified to accommodate any particular audience or area.

OUTLINE OF RECOMMENDED CODIFIED REGULATION FORMAT

TITLE 5
FISH AND GAME

PART
SUBSISTENCE FISHERY

CHAPTER
YUKON AREA

ARTICLE 1
DESCRIPTION OF AREA

5 AAC __. __. DESCRIPTION OF AREA.

ARTICLE 2
FISHING SUBDISTRICTS AND SECTIONS

5 AAC __. __. FISHING SUBDISTRICTS AND SECTIONS.

ARTICLE 3
FINFISH FISHERY

5 AAC __. __. FISHING SEASONS AND WEEKLY FISHING PERIODS.

- () SALMON
- () OTHER FINFISH

5 AAC __. __. GEAR

- () SALMON
- () OTHER FINFISH

5 AAC __. __. GEAR SPECIFICATIONS AND OPERATION

- () SALMON
- () OTHER FINFISH

5 AAC __. __. IDENTIFICATION OF GEAR

- () SALMON
- () OTHER FINFISH

5 AAC __. __. PERMITS AND QUOTAS.

- () SALMON
- () OTHER FINFISH

5 AAC __. __. CLOSED WATERS

- () SALMON
- () OTHER FINFISH

ARTICLE 4
SHELLFISH FISHERY

- 5 AAC __. __. FISHING SEASONS.
- 5 AAC __. __. GEAR.
- 5 AAC __. __. GEAR SPECIFICATIONS AND OPERATION.
- 5 AAC __. __. IDENTIFICATION OF GEAR.
- 5 AAC __. __. PERMITS AND QUOTAS.
- 5 AAC __. __. SPECIAL RESTRICTIONS.

CHAPTER
GENERAL PROVISIONS (STATE-WIDE)

ARTICLE 1
FINFISH FISHERY

- 5 AAC __. __. FISHING SEASONS.
- 5 AAC __. __. GEAR.
- 5 AAC __. __. GEAR SPECIFICATIONS AND OPERATION.
- 5 AAC __. __. IDENTIFICATION OF GEAR.
- 5 AAC __. __. PERMITS AND QUOTAS.
- 5 AAC __. __. SPECIAL RESTRICTIONS.

ARTICLE 2
SHELLFISH FISHERY

- 5 AAC __. __. FISHING SEASONS.
- 5 AAC __. __. GEAR.
- 5 AAC __. __. GEAR SPECIFICATIONS AND OPERATION.
- 5 AAC __. __. IDENTIFICATION OF GEAR.
- 5 AAC __. __. PERMITS AND QUOTAS.
- 5 AAC __. __. SPECIAL RESTRICTIONS.

EXAMPLE OF RECOMMENDED CODIFIED YUKON AREA
FINFISH SUBSISTENCE REGULATIONS

TITLE 5

FISH AND GAME

PART _____

SUBSISTENCE FISHERY

CHAPTER _____

YUKON AREA

ARTICLE 1

DESCRIPTION OF AREA

5 AAC 03._____. DESCRIPTION OF AREA

(a) All waters including those draining into the Bering Sea between the latitude of Canal Point Light and the latitude of the western most point of the Naskonat Peninsula.

ARTICLE 2

FISHING SUBDISTRICTS AND SECTION

5 AAC 03._____. FISHING SUBDISTRICTS AND SECTIONS

() Yukon district: all waters including those draining into the Bering Sea between the latitude of Canal Point light and the latitude of the westernmost point of the Naskonat Peninsula;

() subdistrict 1: that portion of the Yukon River drainage from its mouth upstream to the mouth of the Anuk River and all waters of Black River including waters within one nautical mile of its mouth;

() subdistrict 2: that portion of the Yukon River drainage from the mouth of the Anuk River upstream to Toklik;

() subdistrict 3: that portion of the Yukon River drainage from Toklik upstream to the mouth of the Bonasila River;

() subdistrict 4: that portion of the Yukon River drainage from the mouth of the Bonasila River upstream to the mouth of Illinois Creek at Kallands.

() Section 4 A: that portion of the drainage from the mouth of the Bonasila River upstream to Cone Point;

() section 4 B; that portion of the drainage from Cone Point upstream to the mouth of Illinois Creek.

() Subdistrict 5: that portion of the Yukon River drainage (excluding the Tanana River drainage) from the mouth of Illinois Creek to the U.S.-Canada border.

() section 5 A: that portion of the drainage from the mouth of Illinois Creek upstream to a marker placed two miles downstream of Waldron Creek:

() section 5 B: that portion of the drainage from a marker placed two miles downstream of Waldron Creek upstream to the U.S.-Canada border:

() Subdistrict 6: the Tanana River drainage

() section 6 A: that portion of the drainage from the mouth of the Tanana River upstream to the mouth of the Kantishna River;

() section 6 B: that portion of the drainage from the mouth of the Kantishna River upstream to the mouth of the Wood River;

() section 6 C: that portion of the drainage from the mouth of the Wood River upstream to the mouth of the Chena River.

ARTICLE 3

FINFISH FISHERY

5 AAC 03.____. FISHING SEASONS AND WEEKLY FISHING PERIODS.

() Salmon

() In the following locations salmon may only be taken during the weekly openings of the commercial salmon fishing season and may not be taken for 24 hours before the opening and following the closure of the commercial salmon fishing season described in sec () and () of this chapter:

() subdistricts 1, 2 and 3

() subdistrict 4, excluding the Koyukuk and Innoko River drainages and excluding that area between the mouths of the Rodo and Nowitna Rivers where the requirements of sec. 980(a) (2) (d) of this chapter are effective;

() subdistrict 5, excluding the Tozitna River drainage and that portion of the Tanana River drainage upstream of the mouth of the Salcha River;

() Commercial Salmon Fishing Season

() in subdistricts 1, 2 and 3 from June 10 through August 31, except that when June 10 falls within a closed weekly period the season will open the next following open weekly period; the early season is closed by emergency order and subsequent seasons are opened and closed by emergency orders;

() in subdistricts 4, 5 and 6 from June 15 through September 30

() the early season is closed by emergency order and subsequent seasons are opened and closed by emergency order;

() section 4 A closes August 1.

() Commercial Salmon Fishing Periods.

() subdistrict 1

() June 10 through July 10, salmon may be taken from 6:00 p.m. Monday until 6:00 p.m. Tuesday and from 6:00 p.m. Thursday until 6:00 a.m. Saturday

() after July 10 salmon may be taken from 6:00 p.m. Monday until 6:00 a.m. Wednesday and from 6:00 p.m. Thursday until 6:00 a.m. Saturday.

() subdistrict 2:

() June 10 through July 10, salmon may be taken from 6:00 p.m. Sunday until 6:00 p.m. Monday and from 6:00 p.m. Wednesday until 6:00 a.m. Friday.

() after July 10, salmon may be taken from 6:00 p.m. Wednesday until 6:00 a.m. Friday;

() subdistrict 4: salmon may be taken from 6:00 p.m. Sunday until 6:00 p.m. Friday;

() subdistrict 5: salmon may be taken from 6:00 p.m. Tuesday until 6:00 p.m. Sunday, except in section 5B where salmon may be taken seven days a week;

() subdistrict 6: salmon may be taken from 6:00 p.m. Monday until 6:00 p.m. Saturday.

() Other Finfish

() Except as provided in secs _____ - _____ of this chapter, finfish other than salmon may be taken seven days per week.

5 AAC 03._____. GEAR.

() Except as otherwise provided in this chapter, finfish may be taken as follows:

() Salmon

() salmon for subsistence purposes may be taken only by gillnet, beach seine or fishwheel;

Other Finfish

finfish other than salmon may be taken by forms of legal gear described in 5 AAC 39.105.

5 AAC 03.____.GEAR SPECIFICATIONS AND OPERATIONS

Salmon

in subdistricts 1 and 2, commercial fishermen may not take salmon for subsistence purposes by gill nets larger than six-inch mesh after a date specified by emergency order between June 27 and July 15;

in subdistricts 4, 5 and 6, salmon may not be taken for subsistence purposes by drift gill net;

Salmon and other finfish

during the weekly open periods of the commercial salmon fishing season, a commercial fishermen may not fish for commercial and subsistence purposes simultaneously with more than one type of gear;

the aggregate length of set gill net in use by an individual may not exceed 150 fathoms and each drift gill net in use by an individual may not exceed 50 fathoms in length;

in subdistricts 4, 5 and 6, it is unlawful to set subsistence fishing gear within 200 feet of other operating commercial or subsistence fishing gear;

5 AAC 03.____.IDENTIFICATION OF GEAR.

Salmon and other finfish

each fishwheel must have the first initial, last name, and address of the operator plainly and legibly inscribed on the side of the fish wheel facing midstream of the river;

for all gill nets and unattended gear, the first initial, last name and address of the operator must be plainly and legibly inscribed on an attached key or buoy;

this information must be plainly and legibly inscribed on a stake inserted in the ice that is attached to gear operated under the ice;

a gill net may obstruct not more than one-half the width of any fish stream; a stationary fishing divide may obstruct not more than one-half the width of any salmon stream. (Authority: AS 16.05.251(2) and (4))

5 AAC 03._____.PERMITS AND QUOTAS.

() Fish may be taken for subsistence purposes without a permit except as provided in sec _____ - _____ of this chapter and except in the following locations where a yearly permit must be secured from the local representative of the department.

() Tanana River drainage above the mouth of the Wood River;

() Yukon River drainage from the mouth of the Hess Creek to the mouth of Dall River;

() Middle Fork drainage of the Koyukuk River system between Dry Gulch and the mouth of Hammond River;

() Fish other than salmon may be taken by permit designating restrictive measures for the protection of salmon in subdistrict 4 between the mouths of the Rodo and Nowitna Rivers during June 15 to July 15;

() If a permit is required by sections _____ - _____ of this chapter the following stipulations apply: Permits shall be obtained from a local representative of the department prior to subsistence fishing. Permits shall be retained in the possession of the permittee and be readily accessible for inspection while taking or transporting the species for which the permit is issued. The permit may designate the time and area of fishing and the type and amount of fishing gear. Each subsistence fisherman should keep accurate records of the catch involved, showing the number of fish taken by species, location and date of the catch, and such other information as the department may require. Subsistence fishing reports shall be completed on forms provided by the department and submitted to the department office from which the permit was issued at a time specified by the department for each particular area and fishery. Only one permit will be issued to each household per year. Authority: AS 16.05.251 (2), (3) and (12)

5 AAC 03._____.CLOSED WATERS.

(Salmon and other finfish)

() the following locations in the upper Yukon River drainage are closed to subsistence fishing (except that whitefish and suckers may be taken under the authority of a permit designating restrictive measures for the protection of other fishes; this permit may be obtained from the Commissioner or his local representative):

() streams and within 500 feet of their stream mouths

() Birch Creek, Beaver Creek, Clearwater Creek (Deita Clearwater Creek at 64° 06' N. lat., 145° 34' W. long), Clear Creek (Richardson Clearwater Creek at 64° 14' N. lat., 146° 16' W long), Goodpaster River, Shaw Creek, Salcha River, Little Salcha River, Chena River, Chatanika River, Big Salt River, Hess Creek, and Blue Creek;

() Dall River; closed June 10 through September 10;

() streams: Ray River;

() Lakes: Deadman, Jan, Boleo, Birch, Lost, Harding, Craig, Fielding, Two-Mile, Quartz, and Little Harding;

() sloughs: Chena (Piledriver);

() the following drainages located north of the main Yukon River are closed to subsistence fishing:

() Kanuti River upstream from a point five miles downstream of the state highway crossing;

() Fish Creek upstream from the mouth of Bonanza Creek:

() Bonanza Creek;

() Jim River including Prospect Creek and Douglas Creek;

() South Fork of the Koyukuk River system upstream from the mouth of Jim River;

() Middle Fork of the Koyukuk River system upstream from the mouth of the North Fork except between Dry Gulch and the mouth of Hammond River where subsistence fishing is allowed by permit only;

() North Fork of the Chandalar River system upstream from the mouth of Quartz Creek;

() The main Tanana River and its adjoining sloughs are closed to subsistence fishing between the mouth of the Salcha River and the mouth of the Gerstle River, except that salmon may be taken in the area upstream of the Richardson Highway bridge to the mouth of Clearwater Creek after November 20;

() The Tanana River drainage is closed to subsistence fishing for pike between the Kantishna River and the Delta River at Black Rapids on the Richardson Highway and Cathedral Rapids on the Alaska Highway;

() in the Yukon River drainage (excluding the Koyukuk River drainage) between the mouth of Rodo River to the mouth of Nowitna River, fish other than salmon may be taken under authority of a permit designating restrictive measures for the protection of salmon during June 15-July 15.

EXAMPLE OF RECOMMENDED CODIFIED GENERAL PROVISIONS
FOR FINFISH SUBSISTENCE REGULATIONS

CHAPTER _____

GENERAL PROVISIONS

ARTICLE 1

FINFISH FISHERY

5 AAC 03._____.SEASONS, GEAR AND AREAS

Shellfish, aquatic plants and fish other than salmon may be taken for subsistence purposes at any time in any area of the state by any method unless restricted by the subsistence fishing regulations in chapters _____ - _____ of this title. (Authority: AS 16.05.251 (2), (3), (4), (11))

5 AAC 03._____.IDENTIFICATION OF GEAR.

() Each subsistence fisherman shall plainly and legibly inscribe his first initial, last name, and address on his fishwheel, or on a key or buoy attached to unattended fishing gear.

5 AAC 03._____.PERMITS AND QUOTAS.

() Salmon may be taken only under terms of a permit issued by the commissioner or his local representative or as otherwise provided in this title. Permits shall be retained in the possession of the permittee and be readily accessible for inspection while taking or transporting the species for which the permit is issued. Gill nets used for subsistence fishing under the terms of a permit for salmon may not exceed 50 fathoms in length, except as provided in _____.

() The number of salmon taken for subsistence purposes shall not exceed the limits set out in permits issued under the authority of this title.

5 AAC 03._____.SPECIAL RESTRICTIONS.

() Salmon and halibut may be taken for subsistence purposes only by residents.

() It is unlawful to buy, sell or barter subsistence-caught fish or parts thereof, except as permitted by the purchase and sale of salmon roe regulations in _____ of this title.

() Fishing for, taking or molesting any fish by any means, or for any purpose, is prohibited within 300 feet of any dam, fish ladder, weir, culvert or other artificial obstruction.

() The use of explosives and chemicals is prohibited except as provided in sec. _____ of this chapter.

() Subsistence fishing by the use of a line attached to a rod or pole is prohibited except when fishing through the ice in the Bristol Bay and Arctic-Yukon-Kuskokwim areas.

() Each subsistence fisherman shall plainly and legibly inscribe his first initial, last name, and address on his fishwheel, or on a key or buoy attached to unattended fishing gear.

() Salmon taken under authority of a subsistence permit may not be used as bait for commercial fishing purposes.

UPPER YUKON AND TANANA RIVER DRAINAGES
SUBDISTRICTS 4, 5, and 6.

SUBSISTENCE FISHING

1. Legal Gear: Set gill nets, fishwheels and beach seines may be used for the capture of salmon.
2. IT IS UNLAWFUL TO BUY, SELL OR BARTER SUBSISTENCE-CAUGHT FISH OR PARTS THEREOF, INCLUDING SALMON ROE.
3. In subdistricts 4, 5 and 6, subsistence fishing is prohibited for 24 hours before the opening and following the closure of the commercial salmon fishing season.
4. Subsistence fishermen must identify their fishwheels by placing their last name, first initial and address on the side of the fishwheel facing midstream of the river. Set gill nets must be identified by placing a buoy or can to the outer end of the net with the operator's last name, first initial and address marked on it.
5. It is unlawful to set subsistence fishing gear within 200 feet of other operating subsistence or commercial fishing gear.
6. Permits: Subsistence fishermen desiring to fish for salmon in that portion of the Tanana River drainage upstream of the Wood River and in the Yukon River drainage between the mouth of Hess Creek and Dall River are required to obtain a permit by appearing in person or by writing ADF&G in Fairbanks. Numbers of fish may be limited under terms of the permit or contain other restrictions for the conservation of fishery resources.
7. Weekly Fishing Periods: See section on commercial fishing periods. Salmon may not be taken for subsistence purposes during the weekly closures or taken for 24 hours before the opening and following the closure of the commercial fishing seasons.
 - (a) DURING CLOSURES OF THE COMMERCIAL FISHING SEASONS IN SECTION 6-C OF SUBDISTRICT 6 (THAT PORTION OF THE TANANA RIVER DRAINAGE FROM THE MOUTH OF WOOD RIVER UPSTREAM TO THE MOUTH OF THE SALCHA RIVER) SALMON MAY BE TAKEN FOR SUBSISTENCE PURPOSES FROM 6:00 P.M. FRIDAY TO 6:00 P.M. MONDAY OF EACH WEEK.
8. Gill nets may not obstruct more than one-half the width of any waterway.

Final Report

Wednesday
June 17, 1981

Part II

**Department of the
Interior**

Fish and Wildlife Service

Alaska National Wildlife Refuges; Interim
Management Regulations