



Alaska Outdoor Council

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November 30, 2006

Mel Morris, Chairman Board of Fisheries
ATTN: BOF COMMENTS
ADF&G Boards Support Section
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RE: Bristol Bay Finfish, December 4th Dillingham Meeting

Chairman Mel Morris,

The Alaska Outdoor Council (AOC) appreciates the opportunity to provide written comment on proposals being considered by the Board of Fisheries (BOF). AOC is a statewide organization representing 50 outdoor clubs and 2,500 individuals with a combined membership of over 10,000 Alaskans. AOC has advocated for scientific management of natural resources, habitat protection, enforcement of fish and game regulations and public access for the wild food harvest of fish and game since before statehood.

AOC recommends that the BOF take no action on Proposal #121 to create a fish reserve area or refuge on state-owned waters in the Lower Talarik Creek, Upper Talarik Creek and Koktuli River drainages. The intent of Proposal #121 is to stop resource development on public lands open to mineral extraction, regardless of whether fish stocks in the Bristol Bay drainage will be negatively affected. AOC does not believe this was the intent of the legislature when it passed AS 16.05.251(a)(1) into law.

AOC is also concerned about the position the board, and future boards, might find themselves in if they act on Proposal #121. Each time a new resource development project is proposed we expect to see a proliferation of such proposals from the various preservationist groups around the state. It is our observation that the board's time is over allocated now, and the issues before the board are becoming more, not less, complex. By accepting responsibility for approving or rejecting proposals to limit development – industrial, commercial, or residential – the board is assuming an overwhelming workload.

AOC opposes the creation of a “special citizens advisory committee” proposed for a newly created Lower Talarik Creek, Upper Talarik Creek and Koktuli River fish reserve area or refuge. When the legislature passed AS 16.05.260, creating advisory committees they clearly stated their intent that fish and game advisory committees (AC) “be composed of persons well informed on the fish or game resources of the locality”. The Boards of Fisheries and Game echoed this intent when they adopted 5 AAC 96.010. AC’s were “to provide a local forum for the collection and expression of opinions”. AOC opposes any BOF action that would dilute the F&G Advisory Committee system currently in place in the Bristol Bay area, or anywhere else in the state. We believe that the “special committee” envisioned in Proposal #121 would at least dilute, and at worst conflict with, the local AC.

AOC would also oppose the use of F&G Funds for any “annual assessment of issues” on the proposed Lower Talarik Creek, Upper Talarik Creek and Koktuli River fish reserve area or refuge conducted by the newly formed “special citizens advisory committee”. Assessing the effects of resource development on fish stocks and the habitat on which fish stocks are dependent is the job of the Alaska Department of Fish & Game. If current statutes and BOF regulations do not allow for the adequate assessment of fish conservation and adherence to the sustained yield principle enshrined in Article VIII, Section 4, of the State Constitution then actions to address these shortcomings are needed statewide, not just in the Bristol Bay area.

AOC is prepared to work with the BOF and the Alaska legislature to assure that non-renewable resource development does not negatively affect the long term sustainability of Alaska’s fisheries whether in Bristol Bay or other drainages statewide. The board should continue to rely on the regulatory process currently in place and take no action on Proposal #121.

Thank you for the opportunity to provide written testimony on AOC’s behalf.

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Cc: Governor-Elect Sarah Palin
McKie Campbell, Commissioner of Fish & Game, State of Alaska