



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
c/o Office of Subsistence Management
1011 E. Tudor Rd., MS 121
Anchorage, AK 99503-6199**

RAC/SE 19xxx.DP

APR 08 2019

Shellene L. Hutter
Regulations Program Coordinator
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: Council's comments on Proposed Ending of the Freshwater Sport Fish Guide Logbooks Program

Dear Ms. Hutter:

The Southeast Alaska Subsistence Regional Advisory Council (Council) is concerned about the impacts that the proposed ending of the Freshwater Sport Fish Guide Logbooks Program (Freshwater Logbooks Program) may have on subsistence users in this region. This Council was formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act (FACA). The Council's charter establishes its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska Region (ANILCA §805). The Council represents the Federally qualified subsistence users and reviews resource management actions that may impact subsistence resources critical to these users.

This Council has valuable, relevant knowledge on this issue and wishes to provide input on potentially significant impacts to subsistence uses that may result from the proposed regulatory changes to end the Freshwater Logbooks Program. At its spring meeting, the Council discussed the State's reporting requirements for sport fishing services and sport fishing guides; specifically, those requirements that the Commissioner of the Alaska Department of Fish and Game (ADF&G) proposes to adopt, under a delegation of authority:

5 AAC 75.075(g) and 5 AAC 75.076(a)(2); 5 AAC 75.076(b)(1); 5 AAC 75.076(c) and 5 AAC 75.076(e) are proposed to be changed to eliminate the requirement to obtain and complete Freshwater Sport Fish Guide Logbooks for those services and guides operating in fresh waters.

The Council was informed of the following: discontinuation of the Freshwater Logbooks Program was part of the fiscal years 2019 and 2020 budget reduction process and, since the program is no longer funded by a license fee, it is not self-supporting; that, until legislation implementing a freshwater guide business license fee is adopted, there will likely be no Freshwater Logbooks Program; and that the Saltwater Logbooks Program will remain in place for the time being, due to the need for that data for the Pacific Salmon Commission for addressing Chinook Salmon Treaty obligations and halibut management.

The Council is opposed to the discontinuation of the Freshwater Logbooks Program and feels it is unfortunate that the State looks at the program as a way to reduce the budget instead of as a valuable way to manage a resource. Funding should be available to manage resources. The data collected through the Freshwater Logbooks Program is crucial in providing information that informs management decisions.

This program is necessary to gather information and monitor angler activity and fish harvest in public areas. This lack of data will be detrimental to the management of these resources.

If the Freshwater Logbooks Program is discontinued:

- 1) **It will create a gap in accurate numbers of fish being caught and retained from freshwater systems.** There is no other form of reporting that would capture the range of data collected in the Freshwater Logbooks. It is imperative that the use documented in the Freshwater Logbooks, such as the number of fish caught, the areas where they are taken, and by whom they are taken, continues so that management of resources in freshwater systems is based on accurate reporting.
- 2) **Information on guided freshwater fishing locations and its impacts on systems and the surrounding environment will be lost.** The Freshwater Logbooks Program is necessary to gather information and monitor angler activities occurring close to and in/on public lands/streams.
- 3) **Information contained in the Freshwater Logbooks documents what species live in each system and can help determine return times.** This data is essential for making decisions, especially in times of conservation concern. The Council recalled how important the State's data was in understanding what was happening to steelhead in the water systems and feels that without continued collection of such data, damaging decisions based on inaccurate or unknown information could be made in the future.
- 4) **Logbooks document who is using the services of Commercial Guides and whether they are resident or non-resident anglers.** Guides are required to log what area was fished, including on Federal lands or streams, and must report clients and their catch. The elimination of this collection of data could negatively affect freshwater resource

- 5) management. Council members shared first-hand observations of guide practices and their clients that may be having a significant impact on the resources. All of the data associated with guided fishing in freshwater would be lost without the Freshwater Logbooks Program, leaving a major amount of harvest unaccounted.

Additionally, this Council discussed the disparity of reporting requirements between user groups, should this Freshwater Logbooks Program be discontinued. There is a requirement for a subsistence user to make a record of use; however, ending the Freshwater Logbooks Program would eliminate a requirement from guided anglers. Subsistence Users should not have an added burden for utilizing freshwater streams. Again, for management decisions, which account for the effect by all user groups, the Freshwater Logbooks Program should remain in place. If there is a requirement for one user group to record harvest information, all user groups should be required to record it.

Lastly, the Council discussed its concerns over the lack of accountability for unguided activities and feels strongly that recording catch information should also be required of all fishermen. For several years, the Council has received information and testimony regarding unguided sport fishing and the harmful consequences caused by many "unguided" fishermen. This Council feels there is a need for more accountability of unguided anglers. Requiring data from unguided anglers would help to show the impacts of that user group. The Council would like to see the Freshwater Logbooks Program not only continue but also add reporting requirements like those of outfitters supplying boats, equipment, and information to sport fishermen. Without including this user group, the Freshwater Logbooks Program is not fulfilling a crucial role in managing a resource.

The change in the current Freshwater Logbooks Program will adversely affect the ability to manage freshwater resources, and the Council respectfully requests that the State continue this critical program. The Council appreciates the opportunity to convey its concerns regarding the effects discontinuation of this program may have on subsistence food resources that many of the Southeast Alaska families depend upon. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-586-7918 or deanna.perry@usda.gov.

Sincerely,



Donald Hernandez
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management

Jennifer Hardin, PhD, Acting Deputy Regional Director, Office of Subsistence Management
Gregory Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Robbin LaVine, Acting Anthropology Division Supervisor,
Office of Subsistence Management
Katerina Wessels, Acting Council Coordination Division Supervisor,
Office of Subsistence Management
Thomas Whitford, Regional Subsistence Program Leader, U.S. Forest Service
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record