

State Lands in Alaska's Bristol Bay Region Need Your Voice!

The State of Alaska's Department of Natural Resources (DNR) is deciding how state land in the Bristol Bay region will be managed for the next 20 years. Home to rivers and tributaries that help produce the largest wild salmon runs in the world, Alaska's Bristol Bay region remains one of the state's most important habitats. Among, local businesses that rely on the continued health of the region's ecosystem, Bristol Bay's renewable resources support the rich commercial salmon fishery, seafood processors, tourism companies, sports anglers and hunters and Native practices that embody essential cultural values. .

Out of concern that the State's 2005 plan did not strike a balance between development and protecting fish and wildlife or the region's subsistence users and businesses, six Bristol Bay Tribes as well as commercial and sport fishing organizations sued DNR over the 2005 plan. As a result of the lawsuit, DNR agreed to revise the 2005 Plan and have recently released their draft revised 2013 Bristol Bay Area Management Plan (plan). However, the proposed land management classifications that DNR is considering in the recently released plan fail to protect the renewable living resources and the clean water that are vital to Alaska Native communities and that are the backbone of the sport fishing, sport hunting and commercial salmon fishing industries that generate over \$100 million annually in the region.

DNR is accepting public comment on their 2013 Revised Bristol Bay Area Plan (plan) until May 6th. Please tell DNR that current revisions fall short and urge them to adopt the Citizens Alternative Bristol Bay Area Plan submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen, and a Bristol Bay based businesses.

Land management decisions should reflect the needs and desires of local communities, as well as people across Alaska who come to this region to work or to enjoy recreation such as fishing and hunting. The plan currently open for comment should be revised to better protect the existing, globally-significant economy and important subsistence practices and values based on renewable resources.

Take Action Now! Help ensure that the final 2013 plan adopts a sustainable vision for the future of Bristol Bay.

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More about the Citizen's Alternative Bristol Bay Area Plan

The original 1984 plan for this area classified 11 million acres lands with a focus for long-term conservation of natural resources by balancing resource development with habitat conservation. About 80% of the valuable Kvichak and Nushagak watershed and surrounding areas were co-classified as habitat and some other use. DNR created a drastically different plan in 2005 that abandoned the 1984 plan, threw out the requirement that multiple uses be compatible, and reclassified much of the land previously co-classified as habitat as simply resource management areas. Consequently, vast areas were left vulnerable to development, such as mining, that could be carried out without concern for preserving wild salmon habitat on which the region's rich subsistence and commercial economies depend. The revised 2013 plan currently open for comment until May 6th includes improvements from the 2005 plan, but is not nearly comprehensive enough.

DRAFT ACTION ALERT to be sent to ALASKA RESIDENTS April 26, 2013

The Citizen's Alternative Bristol Bay Area Plan significantly revises the area-wide management guidelines to ensure that fish and wildlife habitat, recreation, and subsistence in the Kvichak and Nushagak watersheds are protected. The Citizen's Alternative would support the core renewable assets of the Bristol Bay region by increasing habitat classification for fish and wildlife and requiring that any development proposed on land co-classified as habitat be compatible with preserving other uses, like fishing and subsistence, occurring on that land. Several of the key revisions are:

- an automatic instream flow protection for salmon
- use of the "precautionary principle" when making any land use decisions that may significantly impact salmon
- a presumption that all waters in the Bristol Bay region are anadromous
- prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds
- a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining

LETTER COPY

Mr. Bruce Phelps, Section Chief
Alaska Department of Natural Resources
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Anchorage, AK 99501
dnr.bbapamend@alaska.gov

May 6, 2013

Dear Mr. Phelps:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the *Citizen's Alternative Bristol Bay Area Plan* into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely,

Name _____
Address _____
State, City, Zip _____