

Tyonek Exhibit A
(10. pages)

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**UNITED STATES DEPARTMENT OF COMMERCE
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION**

**IN THE MATTER OF:
PROPOSED REGULATIONS GOVERNING
THE TAKING OF COOK INLET, ALASKA, BELUGA
WHALES BY ALASKA NATIVES FOR SUBSISTENCE**

Docket No. 000922272-0272-01

**TYONEK'S SUBMISSION PURSUANT TO THE COURT'S PRE-
HEARING ORDER**

COMES NOW the Native Village of Tyonek through counsel John Starkey and hereby submits comments to NMFS proposed final plan, documentary evidence and proposed witness testimony pursuant to the court's pre-hearing order on June 10, 2004.

COMMENTS REGARDING NMFS PROPOSED FINAL PLAN

1. NMFS states at page 1 that "[s]everal Alaska Native groups have stated their minimal collective needs as no fewer than one and one half whales annually." Tyonek believes the more accurate statement is that this minimal harvest is only acceptable for the short term while the population recovers from its current low levels to a level that represents less risk that the population will eventually recover. It is Tyonek's position that reducing harvests to this minimal level is a sacrifice that the Native community of hunters is willing to make in the short term, but that cultural and nutritional needs are not being even minimally met at this level, and that a long term harvest at this level would have severe detrimental effects on the subsistence way of life. As explained below, the subsistence harvest should increase beyond minimal levels as the beluga population increases. The

increase in harvest as the population grows should be greater than what NMFS proposes.

2. It is Tyonek's position that the main criteria used in NMFS plan, 95% certainty that there will not be more than a 25% delay in recovery, does not achieve a reasonable balance of the dual goals of recovery and providing for the continuation of subsistence uses. For example, as pointed out in the attached preliminary analysis by Dr. Punt, if the 25/95 criteria is used to determine harvest levels after the population reaches a point where the time to recovery is only 2 years, a delay of more than 6 months to recovery violates the 25/95 rule and accordingly drives the allowable harvest down. In Tyonek's view, the 25/95 rule, or some variation of the rule, may be appropriate in the early and more critical stages of recovery, for example until the population reaches 500. Tyonek understands the need to act conservatively and to sacrifice hunting opportunity during this early stage. Once the population grows to 500 animals, however, the 25/95 rule unnecessarily restricts harvests.

Tyonek and CIMMC take the position that after the population reaches 500, the 25/95 rule should be amended and/or supplemented along the lines suggested in Dr. Punt's preliminary analysis in order to allow a significantly greater harvest than that proposed by NMFS. As the population grows past the critical stages of recovery, the balance between conservation and subsistence should be adjusted; the sacrifice by subsistence users in the early stages should be rewarded with greater opportunity in the later stages. The plan proposed by NMFS fails in this respect. Dr. Hobbs' July 14 errata table shows a constant harvest of 12 beluga once the population reaches 450 all the way through recovery from depleted status at 780. It is Tyonek and CIMMC's position that the harvest should climb to around 20 beluga between the 500 to 600 population level and to 30 beluga between the 600 to 780 population level.

3. The "Unusual Mortality Limit" (UML) also appears biased towards conservation, particularly after the population reaches the 500 level. Tyonek's simple calculation seems to demonstrate, for example that the UML of 28 at a population level of 499 and the UML of 40 at a population level of 699 both represent a loss of 5.6% of the population. It seems to make sense to Tyonek that losing 5.6 percent of the population at 700 represents less risk to the population than losing the same percent when the population is below 500 beluga. The UML is too static and fails to achieve the goal of balancing conservation and recovery with providing for subsistence uses. The UML is a harsh penalty born completely by subsistence users due to mortalities completely beyond their control. The UML could result in the denial of an entire 5 year harvest allocation and carry forward to reduce the next 5 year quota. The UML needs to be thoroughly examined from its underlying assumptions through its application. It should be less harsh and applied with different or additional criteria as the population grows beyond the

most critical stages of recovery towards full recovery. Finally, NMFS should have to confirm all beluga counted towards the UML.

4. NMFS is developing a Conservation Plan (CP). The recovery may depend at least as much on the CP as on managing the subsistence harvest. There should be some interaction or oversight of the development of the CP by subsistence users. For example, NMFS should agree to provide funding to enable subsistence users to retain necessary scientific expertise to understand and fully participate in the development of the CP and to meaningfully include subsistence users through CIMMC in the development of the CP. It may also be necessary to provide subsistence users an avenue to return to this court with significant unresolved issues regarding the CP

5. NMFS proposes five year harvest intervals. Tyonek suggests that 3 or 4 year intervals may work better and should be investigated.

6. NMFS suggests that it will cooperatively manage the harvest with one or more Alaska Native Organizations. Tyonek and CIMMC believe the harvest should be managed through co-management agreements with CIMMC, and that the harvests should be divided equally between Tyonek and the community of Cook Inlet beluga hunters.

7. Tyonek and CIMMC agree that the proposed harvest regime for 2005 through 2009 was adopted after consultation with Native hunters. CIMMC and Tyonek also recommended, and NMFS appeared to agree, that the harvest for these years should be managed through a co-management agreement with CIMMC and that the harvests should be divided equally between Tyonek and the community of Cook Inlet beluga hunters. This allocation and agreement about co-management was an important part of the consultation.

8. NMFS states that the agreement will include measures for the preferential harvest of male beluga, and that this measure could reduce recovery time. Rewarding subsistence hunters for taking male beluga through increased harvest opportunities should be explored at the hearing.

9. NMFS states that future population surveys of the CI beluga population may be scheduled for every other year after 2005, "if it can be shown to meet the data requirements of this Plan." NMFS should either have to conduct annual surveys, or there should be some specific and clear standard that NMFS must meet before moving to two year surveys. In addition, NMFS should provide funding so that CIMMC can engage a scientific expert to assure that any change in the survey method is in the best interests of the population and the hunters. Funding should also be provided to ensure that CIMMC is able to provide traditional knowledge,

which is acknowledged by NMFS as a valuable contribution to understanding the CI beluga population.

10. Tyonek continues to challenge the use of 1300 for carrying capacity (K) and 780 for maximum net productivity level (MNPL). These numbers are extremely uncertain and weigh heavily towards the conservation/recovery side of the equation. At the very least, there must be a provision in the Plan for reassessing K and MNLP at various stages and time intervals. Tyonek and CIMMC strongly object to being tied into a long term plan based on these numbers without periodic review since the population may never hit 780 if K is set too high.

11. The use of 260 beluga as the point below which no harvest is allowed provides some buffer for a population at the 200 level. Tyonek is not fully convinced that the buffer cannot be less than 260 and would like this issue addressed at the hearing.

In summary, the high number chosen for K and MNPL, the static, inflexible use of the 25/95 criteria, and the Plan's application of the Unusual Mortality Limit taken together weigh significantly in favor of conservation and relatively speedy recovery. While a greater degree of caution may be warranted early in the recovery phase, the Plan fails to reasonably increase the harvest as the population grows and the risks decrease. The Plan puts too much emphasis on the 25/95 criteria. In doing so it unnecessarily shifts too much risk and hardship on a way of life practiced by Alaska Natives since time immemorial and protected by the Marine Mammal Protection Act.

DOCUMENTARY EVIDENCE

Attached hereto is a preliminary analysis of an alternative method for determining harvest levels by Dr. Andre Punt. Dr. Punt will continue to refine his analysis, including examining in more detail if greater harvests can occur between 500 and 600 population levels. Such analysis will be provided, with the permission of the court, to the court and parties as soon as it is completed. Tyonek asks the court to allow such refinement because the time frame was simply too short, given Dr. Punt's schedule and the need to consult with CIMMC and Tyonek, to fully address all the issues in the Plan.

PROPOSED WITNESS TESTIMONY

Tyonek will call the following witnesses.

Dr. Andre Punt who will testify as an expert on:

1. Alternative methods for determining harvest levels resulting in increased harvest levels after the population reaches 500 beluga (comment 2 above and attached document by Dr. Punt);
2. An analysis of the Unusual Mortality Level (comment 3 above);

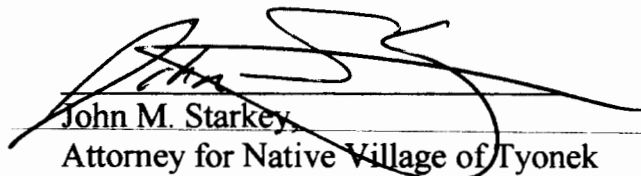
Dr. Punt may develop additional documents to assist in his testimony. Tyonek will provide any such documents as soon as they are available and will seek the court's permission to allow them into evidence if they prove important for the record.

Peter Merryman, President of the Native Village of Tyonek Tribal Council and President of the Cook Inlet Marine Mammal Commission (CIMMC) who will testify on:

1. The importance of the continuation of subsistence harvests and the need to allow greater harvest opportunities as the population grows (comments 1 and 2 above);
2. The need for CIMMC to be involved in the development of the Conservation Plan and in the management of the Cook Inlet beluga population (comments 4 and 9 above);
3. That the harvest should be managed through CIMMC with equal harvests allocated to Tyonek and the community of Cook Inlet beluga hunters (comments 6 and 7 above);
4. The selective harvest of male beluga (comment 8 above);
5. Contesting the Plan's values for K and MNPL, including changes in Cook Inlet habitat that effect these values (comment 10 above);

Ms. Donita Peter, a member of the Native Village of Tyonek, who will testify on the importance of the continuation of subsistence harvests for the Native Village of Tyonek and the need to allow the Village greater harvest opportunities as the population grows (comments 1 and 2 above)

DATED this 15th day of July 2004.


John M. Starkey,
Attorney for Native Village of Tyonek

Counsel by his signature above certifies that a copy of the above pleading and all documents were served via email, fax and/or U.S. mail on all parties requiring service including Thomas Meyer, counsel for NMFS, Gladys Kaitell-Paul, ALJ Docketing Center, Joel and Debra Blatchford, Cook Inlet Treaty Tribes, Trustees For Alaska, Judith M. Brady, and Michael Gosliner.

AN ALTERNATIVE APPROACH TO DETERMINING SUBSISTENCE HARVEST LEVELS

Dr. André E. Punt

Table 1 of the Subsistence Harvest Management Plan (SHMP) lists the strike/harvest levels for 12 ranges of population abundance (referred to as blocks) for each of three possible trends in abundance (increasing, zero, and declining). Table 1 of the SHMP therefore constitutes the *harvest rule*. These strike/harvest levels are a function of the average abundance over the five years prior to the start of the five-year period for which strike/harvest levels are needed and the trend in abundance for the ten years prior to the start of this five-year period. The alternative values listed in Table 1 below are based on the same basic structure for selecting strike/harvest levels as that used to construct Table 1 of the SHMP, except that different levels of precaution (e.g. different rates of recovery) apply to different population sizes.

Table 1. Strike/harvest levels (number per 5-year period). This table is preliminary and intended as an example of an alternative approach to determining harvest levels. I have been asked to examine in more detail if harvests can reasonably be increased for population sizes in the range 500-600. This table may be modified accordingly and will be updated based on an increased number of simulations before the 2 August hearing.

Population (Five year averages)	Harvest		
	Increasing Trend	Zero Trend	Decreasing Trend
<260	0	0	0
260-299	4	4	2
300-349	10	5	2
350-399	12	8	8
400-449	13	9	9
450-499	13	12	12
500-549	14	12	12
550-599	14	14	14
600-649	14	14	14
650-699	26	20	20
700-779	26	23	23

The values in Table 1 of the SHMP are based on a computer model which seeks out the largest harvest in each block that meets the 25/95 criterion¹. The 25/95 criterion therefore applies to all blocks (a total of 30 blocks are included in the computer model used by the NMFS) and it relates to recovery to the assumed OSP level of 780 animals. Table 1 above is based on different ways to formulate the policy goal. A key difference between the policy goal underlying Table 1 above and Table 1 of the SHMP is that rather than a

¹ The 25/95 criterion implies that there will be no more than a 5% probability that difference between the time to recover to the target population size under a harvest rule and the time to recover under no harvesting does not exceed 25% of the time to recover under no harvest.

single goal of recovery to 780, there are a set of intermediate goals for each of three ranges of population size (below 500, between 500 and 600, and above 600).

The approach used to select the strike/harvest levels in Table 1 differs from that used by the NMFS in three ways:

1. The definition of recovery in the SHMP relates to the percentage delay in recovery. This statistic can, however, be misleading. For example, if the time to recovery is only 2 years, a 25% delay in recovery is only six months, a negligible amount of time given our knowledge of the dynamics of the population. Table 1 above is based therefore on the percentage delay in recovery and the actual delay in recovery (i.e. the delay in recovery expressed in numbers of years rather than as a percentage of the time to recovery in the absence of strikes/harvest). The criterion for recovery is that *either* the percentage delay in recovery is less than 25% for a pre-specified level of probability *or* the actual delay in recovery is less than 5 years for a pre-specified level of probability.
2. "Recovery" as defined in SHMP relates to recovery to the assumed OSP level of 780 animals. Table 1 above is based on intermediate goals for recovery:
 - A) for population sizes below 500 animals, the intermediate goal is recovery to 500 animals;
 - B) for population sizes between 500 and 600 animals, the intermediate goal is recovery to 600 animals; and
 - C) for population sizes above 600 animals, the intermediate goal is recovery to 780 animals.

Although Table 1 above involves three intermediate goals, the ultimate objective is still recovery to the assumed OSP level of 780 animals, and applying the harvest rule defined by Table 1 which still achieve this objective. Intermediate goals are included when calculating the table of strike/harvest levels so that different levels of precaution can be applied for different ranges of population sizes.
3. The 25/95 criterion is applied for all blocks when computing the strike/harvest limits in the SHMP. Table 1 above has recovery criteria that are specific to the size of the population.
 - A) for population sizes below 500 animals, the criterion is 25/95, i.e. the strikes/harvests are selected so that the delay in recovery is equivalent to that in SHMP for these population sizes;
 - B) for population sizes between 500 and 600 animals, the criterion is 25/80; and
 - C) for population sizes above 600 animals, the criterion is 25/65.

The above specifications (see Table 2 for a summary) imply that the greatest precaution occurs for population sizes less than 500 animals and least precaution for population sizes above 600 animals.

Table 2. Overview of criteria used to define the strike/harvest levels in Table 1.

Abundance Range	Intermediate Recovery goal	Probability Percentage Delay Exceeds 25%	Probability Actual Delay Exceeds 5 years
<260		Zero harvest	
260-500	500	<5%	<5%
500-600	600	<20%	<5%
600-780	780	<35%	<10%

Technical Aspects

The value of each entry in the table of strike/harvest limits is calculated using simulation methods. The basic calculation process is identical that used in the SHMP except that the performance criterion differs depending on the population size when the harvest rule is first used. The calculation process involves projecting the following population dynamics model forward in time.

$$N_{t+1} = (N_t - H_t)[1 + R_{\max}(1 - \{(N_t - H_t)/K\}^z)] \quad (1)$$

where N_t is the abundance at the start of year t ;
 H_t is the harvest during year t (determined using the harvest rule);
 R_{\max} is the growth rate (selected from a uniform distribution between 2 and 6%);
 K is the carrying capacity; and
 z is a parameter that determines the ratio of OSP to K .

The model is projected forward for 30 scenarios: 10 scenarios regarding the population size when the harvest rule is first applied and three scenarios regarding the trend in the population size prior to this. The 10 abundance-related scenarios are 250-299, 300-349, 350-399, 400-449, 450-499, 500-549, 550-599, 600-649, 650-699, and 700-779, and the three trend scenarios are: a) increasing (R_{\max} between 2 to 6%) over the 10 years prior to the first application of harvest plan, b) stable (R_{\max} between -2 to 2%) over the 10 years prior to the first application of harvest plan, and c) declining (R_{\max} between -2 to -10%) over the 10 years prior to the first application of harvest plan.

The values in the strike/harvest table are set to the maximum values such that:

$$\max_{a,t} Q_{a,t} < 1 \quad (2)$$

where $Q_{a,t}$ is the value of the performance criterion for abundance scenario a and trend scenario t :

$$Q_{a,t} = \min(p_{a,t} / \Omega_{a,t}, q_{a,t} / \Gamma_{a,t}) \quad (3)$$

$p_{a,t}$ is the probability that the percentage delay in recovery to the intermediate recovery goal (500 for population sizes less than 500, 600 for population sizes between 500 and 600, and 780 for population sizes above 600) for abundance scenario a and trend scenario t exceeds 25%;

$q_{a,t}$ is the probability that the actual delay (in years) exceeds five years; and

$\Omega_{a,t}$ is the pre-specified threshold probability that the percentage delay in recovery to the intermediate recovery goal exceeds 25% (0.05 for population sizes less than 500, 0.20 for population sizes between 500 and 600, and 0.35 for population sizes above 600).

$\Gamma_{a,t}$ is the pre-specified threshold probability that the actual delay in recovery (i.e. the delay expressed in numbers of years) to the recovery goal exceeds 25% (0.05 for population sizes less than 600, and 0.10 for population sizes above 600).

Tyonek Exhibit B
(6 pages)

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**UNITED STATES DEPARTMENT OF COMMERCE
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**IN THE MATTER OF:
PROPOSED REGULATIONS GOVERNING
THE TAKING OF COOK INLET, ALASKA, BELUGA
WHALES BY ALASKA NATIVES FOR SUBSISTENCE**

Docket No. 000922272-0272-01

**TYONEK'S RESPONSE TO THE SUBMISSIONS OF THE MMC AND
THE NMFS**

COMES NOW the Native Village of Tyonek through counsel John Starkey
and hereby submits its response to the July 15 submissions by the Marine
Mammal Commission (MMC) and the National Marine Fisheries Service (NMFS)

1. Tyonek proposes to call Ms. Barbara Mahoney and Brad Smith of the NMFS to testify about the Conservation Plan, the CI beluga surveys, other potential habitat and environmental impacts to the CI beluga population and "unusual mortalities" and in particular the mortalities observed in 2003 that prevented the 2004 subsistence harvest.
2. Tyonek also proposes to call no more than two CI beluga hunters from outside Tyonek to testify regarding the impact of the Plan on their subsistence way of life and the taking of male beluga.
3. Tyonek does not contest Dr. Goodman's qualifications to testify on many of the issues he raises in his Declaration. Dr. Goodman, however, does not appear to be an expert on the legal requirements of the MMPA or on the correct balance between recovery of the CI beluga population and providing for subsistence uses. There are several references to policy questions in Dr. Goodman's Declaration,

most if not all of which focus on the goal of recovery. There is little, if any acknowledgment that the MMPA also requires NMFS to balance recovery with the goal of providing for the continuation of the subsistence way of life. Thus, it is Tyonek's position that much of Dr. Goodman's analysis is based upon policy calls that are beyond his expertise and which are not consistent with the MMPA.

For example, Dr. Goodman states on page 2 that the Plan "fails to provide for reducing the harvest rate below the interim minimum as soon as substantial information demonstrates that the harvest rate should be reduced to ensure recovery **in accordance with the standard**". The "standard" Dr. Goodman refers to is the 25/95 standard. As Dr. Goodman acknowledges, however, subsection (c) of the parties stipulations stated that the harvest would not be reduced below 1.5 per year "without substantial information demonstrating that subsistence takings must be reduced below that level to allow recovery of the Cook Inlet beluga whale population from its depleted status." The stipulation does not refer to "the standard". Dr. Goodman overlooks this important point. Moreover, while Dr. Goodman is qualified to speak to what information is available to demonstrate recovery or lack thereof, he is not qualified to determine when that information reaches the point of being so **substantial** as to deny or reduce subsistence harvest. This mix of policy and analysis is a prevalent part of Dr. Goodman's Declaration.

4. Dr. Goodman states (p. 5) that his analysis "shows about a 46% probability that the growth capacity is negative." Many of the points he makes in his Declaration appear to follow from this analysis. Dr. Goodman calls this 46% probability (p.5) a "**substantial probability** that the population will actually decline during the period 2005-2009 even in the absence of any subsistence harvest." (Emphasis added). It is important to note that his analysis also shows (according to Tyonek's understanding) that there is a 54% probability that the growth capacity is positive.

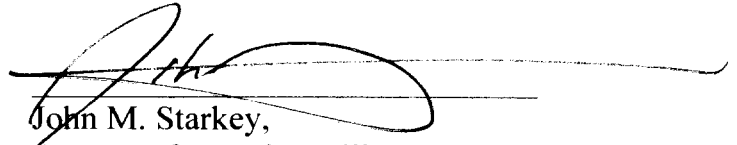
5. See attached comments by Dr. Andre Punt.

6. Much of Dr. Goodman's analysis is based on the use of the 25/95 criteria. Tyonek strongly disagrees with these criteria driving the Plan.

7. Tyonek interprets Dr. Goodman's Declaration and the position of the MMC as having the greatest concern for the Cook Inlet beluga population at lower levels. This is consistent with the willingness of subsistence users to make greater sacrifices until the population reaches some population threshold (perhaps 500) where there is less risk of extinction. After that point, the argument that "Time is of the essence in population recovery" (p. 3 Goodman Declaration) carry less weight, and the rationale for using 25/95 or some other similar "delay in time to recovery" model) makes less sense. The Plan should use different criteria which are less conservative after the population recovers to a threshold. Several goals for

Assessing the extent of recovery (500, 600 and 700 for example) should be included in the Plan and each judged according to standards that reflect the extent of recovery to that point and the associated lessened risk of extinction. Moreover, the plan should have a mechanism for periodic review at points that demonstrate either failure to recover or successful recovery.

DATED this 22nd day of July 2004.


John M. Starkey,
Attorney for Native Village of Tyonek

Counsel by his signature above certifies that a copy of the above pleading and all documents were served via email, fax and/or U.S. mail on all parties requiring service including Thomas Meyer, counsel for NMFS, Gladys Kaitell-Paul, ALJ Docketing Center, Joel and Debra Blatchford, Cook Inlet Treaty Tribes, Trustees For Alaska, Judith M. Brady, and Michael Gosliner.

3. My experience dealing with regulation of subsistence and commercial harvests suggests that management regimes that allow sustained (but low) harvests to ensure cultural needs are satisfied are preferred by subsistence harvesters to management regimes in which catches are reduced substantially so that the population can recover quickly to OSP, at which time much larger harvests can be taken. In contrast, a near moratorium followed by catches close to those which coincide with maximum sustainable yield are more desirable to commercial harvesters. There are, however, exceptions to this general rule, which is itself an issue largely outside the realm of biological scientific techniques.

4. As noted by Dr Goodman, the plan does not explicitly address the issue that the current rate of increase is likely to be below 2% *per annum*. The calculations upon which the Management Plan are based assume that the growth rate will return to a level between 2 and 6% once it is implemented. The plan implicitly accounts for the possibility of a lack of growth because this could result in harvest levels remaining at current levels or declining. Analyses can, and should, be conducted to evaluate the quantitative implications of applying the harvest rule when the growth rate is not 2% or greater in the future in terms of the extent to which application of the management plan increases the probability of the delay in recovery exceeding 25% as well as that of the size of the population declining to below 200 individuals, noting that population decline will occur irrespective of the size of the harvest if the maximum rate of growth is negative.

The Management Plan does not explicitly include regular progress reviews. Such reviews are a standard part of, for example, the Management Plans developed by the International Whaling Commission. They involve evaluating whether the data that have been collected since the Plan was implemented suggest that the basis for the algorithm for setting harvest levels is invalid. Adoption of such reviews recognizes that Management Plans should not be applied automatically. In the context of the Management Plan for Cook Inlet beluga whales, evidence for lack of recovery (e.g. the population having not changed from one range of population sizes to another) over a prolonged period would be evidence for re-evaluating the Plan.

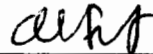
Dr Goodman refers to the IUCN Red List Criteria in his submission. As stated in the Red List Documentation "The quantitative values presented in the various criteria associated with threatened categories were developed through wide consultation, and they are set at what are generally judged to be appropriate levels, even if no formal justification for these values exists. The levels for different criteria within categories were set independently but against a common standard. Broad consistency between them was sought"

http://www.iucnredlist.org/info/categories_criteria2001.html). The thresholds for the "small population" criterion should therefore be applied with considerable caution in this case. In fact, if a population was facing "a high risk of extinction" if it had fewer than 1000 mature individuals, the Cook Inlet beluga population would be in this situation even at population sizes close to (or even larger than) the value for carrying capacity on which the Management Plan is based. It is, however, clearly the case that the probability of irreversible damage to a population is greatest when it is very small. In situations such as the Cook Inlet beluga therefore, management regimes that have a high probability of recovery from levels at which threats pertinent to small populations may be high and a lower probability of continued increase towards OSP (or any other appropriate target level) thereafter seem worthy of technical examination.

7. Dr Goodman emphasized the need for additional research and monitoring to determine the reasons for the lack of increase in population size in recent years and the negative consequences (for both the ability to satisfy subsistence need and for population recovery) of reduced survey frequency. I strongly endorse these remarks.

8. Pursuant to 28 U.S.C. Section 1746, I swear under perjury that the foregoing is true and correct to the best of my belief.

Dated : 22 July 2004



André E. Punt, Ph.D.

July 28, 2004

To: Peter Merryman
President of CIMMC
Department of Fish & Game

From: The Children of Tyonek
Elizabeth J. Standifer
Representative, Tribal Member

Re: Belugas'

This is a letter involving the amount of Belugas that Tyonek receives; we know that Tyonek is very fortunate to be able to capture 1 beluga a year. We would like to receive permission to capture 2 Belugas a year, reasons are as following:

Tyonek's population averages 195-200. The one beluga that Tyonek gets once a year isn't enough; it barely reaches the members of Tyonek. There is also village members who do not live in Tyonek and calls family members to ask for a piece of beluga when the village hunts them.

Tyonek is working very hard to bring back the old traditions of life to teach the children. 80-90% of the population eats beluga and was raised to eat it; just like fish and moose meat. This is one of the many goals; for Tyonek families to raise the younger generations on Beluga feasts. It is very hard to accomplishing this goal when most families don't receive even one chunk of Beluga a year.

The younger generation of Tyonek is anxious to learn the "Old Ways of Tyonek." To help us learn, we look forward to the fishing, and hunting of all types. Beluga hunting and feast is one of the many to teach the kids, Please help us to complete our goals and have the ability to feed all families of Tyonek who eats Beluga and not just half.

Sincerely,
Elizabeth J. Standifer
Elizabeth J. Standifer
Representative, Tribal Member

Janelle Baker

Justin

NICK Joniya Kalooc

Wes Weona

Richard Hawkins

Matthew Schadt

Edna

Tricia Lorraine Chitt

Ginger Telles

Sony

Mary Standifer

Chanel

Ruth

JANIE

Angelena

Talib

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Jane Standifer