



GAN-A'YOO, LIMITED LAND MANAGEMENT POLICIES

Gana-A'Yoo, Limited
Land Management Policies
Amended on February 23, 2018



GANA-A'YOO, LIMITED LAND MANAGEMENT POLICIES

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Introduction

Gana-A'Yoo, Limited ("Gana-A'Yoo") owns the surface estate of approximately 438,362.65 acres of land in and around the Alaskan villages of Galena, Koyukuk, Nulato and Kaltag, received pursuant to the Alaska Native Claims Settlement Act ("ANCSA"). For thousands of years, and still today, the lands now owned by Gana-A'Yoo were and are primarily used for subsistence purposes. Subsistence continues to remain the primary purpose and highest priority use for the people of all four Gana-A'Yoo villages - Galena, Koyukuk, Nulato, and Kaltag.

The following are the Gana-A'Yoo Land Management Policies which shall govern Gana-A'Yoo's management of its land holdings, including, but not limited to, determining the proper use and users of the lands. While, typically, Gana-A'Yoo land use is reserved for Gana-A'Yoo Shareholders and their Descendants in support of promoting healthy communities and to preserve the important historic and cultural aspects of our Koyukon Athabascan heritage, certain aspects of the policies include other people who make their homes in one of the Gana-A'Yoo villages.



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General Principles

- Private property must be respected. Access and use of Gana-A'Yoo Lands is a privilege.
- Subsistence is the primary and highest priority use of Gana-A'Yoo Lands and all other land management policies shall consider their impact to subsistence uses.
- The land will be managed to preserve important historic, cultural, and natural aspects of our Native heritage.
- The land will be managed to attain the widest range of beneficial uses and, to the extent possible, all uses will minimize disturbances without undue environmental consequences and negative impact to any other proposed uses.
- Commercial and government users of Gana-A'Yoo Lands will cover the reasonable costs incurred to administer and monitor their use of Gana-A'Yoo Lands.
- Any commercial use of Gana-A'Yoo Lands and resources shall require fair compensation.
- Adjacent land owners will be notified of permitted activities on Gana-A'Yoo Lands when appropriate.
- Requests for easements or right-of-way will be considered on a case-by-case basis by the Board of Directors.
- Management may issue permits for land use, however, all lease requests shall be considered by the Board of Directors.
- All land use activities must be compliant with all applicable laws, regulations, and corporate policies.



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Definitions

Descendants – This term shall refer to direct lineal Descendants of original Gana-A'Yoo Shareholders (i.e., child, grandchild, great-grandchild, etc.).

Gana-A'Yoo Lands – Gana-A'Yoo Lands include 438,362.65 acres in and surrounding the Alaskan villages of Galena, Koyukuk, Nulato and Kaltag, and such other lands as transferred to Gana-A'Yoo pursuant to ANCSA. The ownership of Gana-A'Yoo Lands extends to the mean high water mark on major waterways described as:

The mean high water mark is a mean of all high water, and the average high water over a 20-year period. As a “rule of thumb”, there are certain tell-tale signs of a mean high water mark. The forest and brush line is definitely Gana-A'Yoo, Limited land, the vegetation (grass) line is a borderline ownership and below the vegetation line to the water line is State of Alaska ownership.

A map of Gana-A'Yoo Lands is available at the Corporation's office located at: 1205 E. International Airport Road, Suite 100, Anchorage, AK 99518.

Improvements – This term means any building, structure, or other relatively permanent facility or improvement affixed to a campsite, utilized for human occupancy or related purposes.

Non-Shareholder Residents – This term refers to those persons who are residents of the villages of Galena, Koyukuk, Nulato and Kaltag who do not hold Gana-A'Yoo stock. Non-Shareholder Residents must show proof of residency in one of the villages for a period of no less than ninety (90) days and demonstrate an intent to remain in one of the villages. Proof of residency may be shown by production of an Alaska Driver's license, DMV records, tax documents, or other official government identification or documents showing the name and physical address of the person. Persons wishing to be considered a Non-Shareholder Resident may demonstrate an intent to remain in one of the Gana-A'Yoo villages by producing a lease agreement, mortgage documents, utility bill, school registration, or other documentation showing the person plans to reside in the village for a period of at least one (1) year.

Permit – This term means a license or other contract whereby Gana-A'Yoo grants use of its lands to an individual or group for a stipulated period of time, for a specific purpose, and subject to terms and conditions dictated by the Corporation. Gana-A'Yoo issues several types of permits, including, but not limited to, Seasonal Use, Campsite, Subsistence, Trapping, and Timber Use permits.



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Public – This term refers to people generally; no residency or ownership requirements apply.

Shareholder(s) – For the purpose of these policies, Shareholder shall be defined as a person who is listed on the books and records of the Corporation as a holder of Corporation stock, including both original enrollees and those persons who have inherited or been gifted Corporation stock.

Shareholder Dependents – This term means immediate family members of a Shareholder, such as a spouse or children.



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General Terms and Conditions for Access and Use of Gana-A'Yoo Lands

All access, use, and permits are subject to the following terms and conditions:

- 1) Those persons with access to or permission to use Gana-A'Yoo Lands shall:
 - a) keep Gana-A'Yoo Lands in a neat and orderly condition during any period of use. All trash must be picked up and removed;
 - b) acknowledge that the access to or use of Gana-A'Yoo Lands does not give rise to any rights or interest in the lands to the user;
 - c) obtain the proper land use permit from the Corporation, as applicable;
 - d) avoid trespass onto other private properties adjacent to the Gana-A'Yoo Lands, and treat the owners and their property with respect;
 - e) carry identification and any applicable permit at all times while on Gana-A'Yoo Lands and present upon request;
 - f) inquire about any relevant restrictions specific to the area of use identified in the permit application;
 - g) take all precautions necessary to prevent wild fires;
 - h) not feed any wild animals;
 - i) assume all risks of personal injury or property damage while on Gana-A'Yoo Lands;
 - j) indemnify and hold Gana-A'Yoo harmless from any and all liabilities arising in any way from the actions or inactions of the permit holder or his/her companions on Gana-A'Yoo Lands; and
 - k) comply with all applicable federal, state, and local laws, including but not limited to permits, licenses, and tags.
- 2) The use of Gana-A'Yoo Lands shall be only by the permit holder, except in cases of hardship where the Corporation, upon request from the permit holder, may allow other parties to assist the permit holder to engage in the permitted activities.
- 3) Non-Shareholder Residents of the villages of Galena, Koyukuk, Nulato and Kaltag, Alaska, must have established a ninety (90) day residency and be able to demonstrate an intent to remain in the community for at least one (1) year, as discussed herein.



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- 4) All minors, persons under the age of eighteen (18), must be accompanied by an adult and, where applicable, both adult and minor must carry a use permit.
- 5) A grant of access or permit (regardless of type) to access or utilize Gana-A'Yoo Lands does not grant any interest in Gana-A'Yoo Lands or any special rights or equities.
- 6) Vehicles that cause damage to the land are not allowed unless the use is on an established trail. The definition for established trails is described as those trails traditionally used by Shareholders and local community members. They include trails regularly used to travel to berry picking or fish camp sites and cemeteries. Such established trails include, but are not limited to: the trail to Bald Hill in Nulato; the trail to the cemetery in Kaltag; or the cat trail above Galena used to travel to various individual land owners' sites. For example, a small tractor or ATV cannot be used on a walking trail, but can be used on an old cat trail.
- 7) Permission to access and use Gana-A'Yoo Lands is conditional upon compliance and may be revoked at any time for failure to comply. Violations of Gana-A'Yoo Land Management Policies may result in denial of future access and use permit applications.



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General Open Use

Gana-A'Yoo Lands are open for Public use only for the following activities:

- a) Sport Fishing;
- b) Short-Term Camping (not to exceed five (5) consecutive days);
- c) Boat Launching and Landing;
- d) Picnics; and
- e) Berry Picking (for subsistence purposes only).

Specific Conditions

None.



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Camping

Short-Term

Gana-A'Yoo Lands are open to the Public for short-term camping. Short-term camping shall not exceed a period of five (5) days. All land areas utilized shall be maintained in a neat and orderly condition and all trash shall be removed upon conclusion of the camping period.

Seasonal Use

Camping for a period of more than five (5) consecutive days requires a Seasonal Use Permit. Seasonal Use Permits shall also be required for all seasonal camps on any Gana-A'Yoo Lands. This includes subsistence fish camps as well as trapping and hunting camps.

The permit holder is allowed to build temporary structures such as fish racks, tent frames, caches, etc. Permanent structures are strictly prohibited.

Permits

Seasonal Use Permits are available to Shareholders and Descendants. In the spirit of supporting healthy people, healthy families and healthy communities, Gana-A'Yoo will make available a limited number of Seasonal Use Permits to Non-Shareholder Residents (as defined herein). The Corporation has the sole discretion to determine how many Seasonal Use Permits shall be made available to Non-Shareholder Residents.

In issuing Seasonal Use Permits, the Corporation is granting to the permittee a license for the specific intended use and shall not be construed as a grant of any rights to or interest in Gana-A'Yoo Lands.

Permit Requirements

The Seasonal Use Permit shall include the name, address, phone number, and email information of the permittee. The Seasonal Use Permit shall also include a description of the Gana-A'Yoo Lands to be utilized, the intended use, and other such information as the Corporation may so determine in its sole discretion to be appropriate. Seasonal Use Permits are subject to all general terms and conditions described herein, and the following specific conditions, as well as any other conditions deemed applicable at the time of issuance as determined by the Corporation.

Specific Conditions

- 1) The use of Gana-A'Yoo Lands shall be only by the permit holder except in cases of hardship where the Corporation, upon request from the permit holder, may allow other parties to assist the permit holder to engage in the permitted activities.



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- 2) Seasonal Use Permit fees will be determined by the Corporation in its sole discretion and published as an attachment to these policies or posted as appropriate.



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Ten Year Camp Site Policy

Extended Use – Campsite Permit

Gana-A'Yoo allows Shareholders, Descendants, and Non-Shareholder Residents, as those terms are defined herein, to utilize Gana-A'Yoo Lands for extended periods up to ten (10) years through the issuance of a Campsite Permit for purposes of subsistence activities. Campsite Permit holders may construct temporary or semi-permanent structures on Gana-A'Yoo Lands within the identified permit area.

Application

An application for a Campsite Permit must be submitted on a Gana-A'Yoo Campsite Permit Application form. Applicants must be eighteen (18) years of age or older. Except as provided herein, only one Campsite Permit may be issued per immediate family. The Corporation may, in its sole discretion, consider additional Campsite Permit applications within an immediate family in the event of hardship.

Campsite Permits are good for a period of ten (10) years and are renewable, subject to the discretion of the Corporation. Campsite Permits shall be non-transferable and non-assignable.

Permit Pricing

Payment shall be made upon issuance of the Campsite Permit.

Permit costs are periodically determined by the Board of Directors with recommendation from the Board's Resource Committee. Currently, Campsite Permit prices are as follows:

- Shareholders and Descendants\$500
- Non-Shareholder Residents.....\$5,000

Size of the Campsite

Campsite Permits shall be issued for either one (1) acre or one-half (1/2) acre sizes. Where campsites areas are located on waterfront property, the waterfront boundary dimensions shall not exceed:

- 208 feet – 1 acre area
- 104 feet – 1/2 acre area



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Locations of Campsite

All Campsite Permits for use of Gana-A'Yoo Lands are subject to the final approval of the Resource Committee.

Permit Requirements

The Campsite Permit shall include the name, address, phone number, and email information of the permittee. The Campsite Permit shall also include the beginning and end dates (inclusive) for use and a description of the Gana-A'Yoo Lands to be utilized, the intended use, and other such information as the Corporation may so determine in its sole discretion to be appropriate. Campsite Permits are subject to all general terms and conditions described herein, and the following specific conditions, as well as any other conditions deemed applicable at the time of issuance as determined by the Corporation.

Specific Conditions

- 1) Any renewal of a Campsite Permit shall be subject to the condition that the permit holder maintain the site and improvements thereon in a good serviceable condition, ordinary wear and tear excluded.
- 2) Whenever Gana-A'Yoo determines it to be in the best interests of the Corporation to establish subdivisions, and the permittee's Campsite Permit covers or is located within the subdivision, the Campsite Permit shall terminate upon notice by the Corporation. In consideration for termination of the permit, the permit holder may be allowed a new permit for a different location at no additional charge and the Corporation or its successor may offer a right of first refusal to lease or sell a lot within such subdivision to the permit holder.
- 3) Permit holders shall remove all improvements from the site within ninety (90) days of the date of termination, or expiration of the Campsite Permit (including its renewal). The land shall be left in reasonable unimpaired condition. Any property not so removed may become property of the Corporation, at its option, or may be moved off the site at the cost of the permit holder.
- 4) Non-use of a site for a period of more than two (2) consecutive calendar years shall terminate the Campsite Permit without right of renewal (subject to the specific terms of the permit); provided, however, that where the non-use is the result of the death, illness, or military service of the permit holder, the Corporation may waive termination.
- 5) Grandfather rights: Non-Shareholders Residents currently holding a permit may renew it at the end of a permit period as long as the campsite use is for the permit holder and his/her immediate family only. All other guidelines apply.



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- 6) Commercial use of campsites are strictly prohibited.



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Game Policies

Gana-A'Yoo game policies address who may access and use Gana-A'Yoo Lands to engage in hunting, fishing, and trapping activities. The State of Alaska and the federal government regulate the actual harvest of fish and game on all lands in Alaska, including Gana-A'Yoo Lands. Subsistence hunting and fishing activities are of the highest priority on Gana-A'Yoo Lands.

Hunting and Fishing

Subsistence hunting is allowed without a permit for the following groups, as those terms are defined herein:

- Shareholders
- Dependents
- Descendants

A limited number of Subsistence Permits shall be available for Non-Shareholder Residents. Fees shall apply.

Trapping

Only Shareholders and Descendants may trap on Gana-A'Yoo Lands.

Shareholders must apply for a Trapping Permit. Trapping Permits are good for a period of five (5) years and may be renewed at the end of the time period. A preference is given to the incumbent permit holder in the event another application is received for the same area.

Guiding

Gana-A'Yoo may permit guiding on Gana-A'Yoo Lands at their discretion. Policies permitting Shareholders to operate as Registered Big Game Guides on Gana-A'Yoo Lands under the laws of the State of Alaska.

If permitted, at a minimum, a business plan would need to be submitted for approval by the Resource Committee and Gana-A'Yoo Board of Directors. Not only would all required licenses need to be in place, but the area open for guiding would be restricted to those lands not normally used by local subsistence hunters, given that the primary use of Gana-A'Yoo Lands is for subsistence use.

Subsistence and Trapping Permits and Applications

Applications for Subsistence and Trapping Permits must be made on the appropriate Gana-A'Yoo permit application form. The issued permit shall include the name, address, phone



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number, and email information of the permittee. The issued permit shall also include the beginning and end dates (inclusive) for use and a description of the Gana-A'Yoo Lands to be utilized, the intended use, and other such information as the Corporation may so determine in its sole discretion to be appropriate. Subsistence and Trapping Permits are subject to all general terms and conditions described herein, and the following specific conditions, as well as any other conditions deemed applicable at the time of issuance as determined by the Corporation.

The Resource Committee or Board of Directors shall determine Commercial Subsistence and Trapping Permit fee amounts annually.

Specific Conditions

- 1) Users are expected to abide by all federal and state hunting and fishing laws, including those regarding subsistence. The State of Alaska and the federal government regulate the actual harvest of fish and game on all lands in Alaska, including Gana-A'Yoo Lands.
- 2) Gana-A'Yoo does not settle trap line disputes.
- 3) Users must show proof of use of structures, if any, on adjacent lands (i.e., native allotments, etc.) by a memorandum of agreement or other signed agreement.
- 4) No hunting or shooting within one (1) mile of any known camp, cabin, or active timber harvest area.
- 5) All game must be cleaned in the field and stored in a way to minimize any potential problems (i.e. bears).



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Timber Policies

Gana-A'Yoo adopted a Forest Stewardship Plan in October 2012. The plan provides guidance in the management of its timber resources. Gana-A'Yoo will work with other local entities, including, but not limited to, Tribes, City Councils, School Districts, and other interested parties to consider any potential and beneficial uses of timber on Gana-A' Yoo Lands.

Timber Use Permits

Shareholders and Descendants wishing to harvest firewood, house logs, or lumber from Gana-A'Yoo Lands are required to apply for a Timber Use Permit. Timber Use Permits may be personal or commercial in nature depending on the intended use, and all such permits shall be subject to approval by the Gana-A'Yoo Resource Committee or Board of Directors.

Firewood

Harvesting firewood is defined as cutting dry trees or deadfall, either standing or down on the ground.

- **Personal Use**

Shareholders and Descendants may harvest firewood for personal use on Gana-A'Yoo Lands at no charge, but must identify the area of Gana-A'Yoo Lands the firewood will be harvested from in the Timber Use Permit application.

- **Commercial Use**

An applicant for a Commercial Timber Use Permit for the harvesting of firewood for commercial use (for sale) shall submit a business plan and proof of liability coverage together with their Timber Use Permit application. All Timber Use Permit applications for commercial use are subject to the approval of the Gana-A'Yoo Resource Committee or Board of Directors. All business plans for the harvesting of firewood for commercial use shall incorporate Gana-A'Yoo's Forest Stewardship Plan.

House Logs and Lumber

Harvesting of trees for use as house logs or lumber is a permitted activity on Gana-A'Yoo Lands.

- **Personal Use**

Shareholders and Descendants may apply for a Timber Use Permit to harvest trees for personal use to be utilized as house logs or lumber.



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- **Commercial Use**

The harvesting of timber for any commercial uses (such as operating a saw mill or selling logs for homes) is strictly prohibited.

Timber Use Permit Applications

Applications for Timber Use Permits must be made on the appropriate Gana-A'Yoo permit application form. The issued permit shall include the name, address, phone number, and email information of the permittee. The issued permit shall also include the beginning and end dates (inclusive) for use and a description of the Gana-A'Yoo Lands to be utilized, the intended use, and other such information as the Corporation may so determine in its sole discretion to be appropriate. Timber Use Permits are subject to all general terms and conditions described herein, and the following specific conditions, as well as any other conditions deemed applicable at the time of issuance as determined by the Corporation.

The Resource Committee or Board of Directors shall determine Commercial Timber Use Permit fee amounts annually.

Specific Conditions

- 1) Gathering of firewood will be performed in such a way as not to cause damage to the surrounding live trees. Only dead standing and down timber may be cut for firewood. Live trees may not be girdled.
- 2) Woodcutting and logging areas must be defined as to not interfere with operations by third parties who have leased land from Gana-A'Yoo.



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Miscellaneous

Applications for use permits for the below activities which require permits must be made on the appropriate Gana-A'Yoo use permit application form. The issued permit shall include the name, address, phone, and email information of the permittee. The issued permit shall also include the beginning and end dates (inclusive) for use, if applicable, and a description of the Gana-A'Yoo Lands to be utilized, the intended use and other such information as the Corporation may so determine in its sole discretion to be appropriate. Use permits are subject to all general terms and conditions described herein, and any specific conditions referenced within the below policies, as well as any other conditions deemed applicable at the time of issuance as determined by the Corporation.

The Resource Committee or Board of Directors shall determine Commercial Use Permit fee amounts annually.

Dog Pound Site – Shareholders may apply for a use permit to use Gana-A'Yoo Lands for the location of a dog pound. The permit holder must be the owner of the animals.

Garden Site – Shareholders may apply for a use permit to use Gana-A'Yoo Lands as a garden site. The garden may be used by an individual, group, or community.

Berry Picking / Mushroom Harvesting – The ability to gather any resources such as berries or mushrooms (or other) commercial distribution is only available to Shareholders.

Commercial Activities Not Identified – Gana-A'Yoo is open to discussing the use of its resources for commercial activities. Interested parties should contact the main office in Anchorage.



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Trespass

Gana-A'Yoo will abide by state laws and mark lands as required. Signs will be posted in areas that are easily accessible and well-travelled. Use without authorization or required permits will constitute trespass and Gana-A'Yoo shall act accordingly.

Violations

Gana-A'Yoo reserves the right to pursue all remedies in equity or at law for violations of Gana-A'Yoo Land Management Policies, including, but not limited to, denial of future access and use permit applications, and prosecution.