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Comments to the Board of Fish regarding fishery proposals in the Bristol Bay Area.

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The following comments are strictly my own. I am secretary for the Nushagak Advisory Committee and sit on the Federal Bristol Bay Advisory Council.

## Proposal # Position Comment

- **18 Support** Eliminate 3 day restriction: With proper education and enforcement we don't need the 3 day restriction. The 3 day per week rule can be extremely onerous in summers with poor weather and tide cycles. There is a lot of competition for limited set net sites and this may reduce the pressure or promote sharing of sites.
- 19 Support as amended by Nushagak AC Dip Nets Subsistence Dillingham area: I wrote this proposal with encouragement from other residents for the reasons stated. I ONLY support this as a subsistence method and only for the Dillingham Beaches area described by regulation for subsistence fishing. I don't advocate it where it might interfere with other fisheries. Care should be taken to assure dip netters do not interfere with other subsistence gear or users.
- **21 Oppose** Rod and Reel Subsistence Six Mile Lake: I think it would be a mistake to open this to all Alaskan subsistence users. The proximity to Anchorage and Kenai Peninsula populations centers could create a real problem. In my experience many of the people living nearby already feel invaded and annoyed by visiting anglers. This would probably add to the competition and potential trespass / competition issues. Current local residents enjoy gear options in L. Clark National Park as Federally Qualified Users and have this gear option open to them.
- 41 & 42 OPPPOSE Nushagak King plan commercial restriction: I am vigorously OPPPOSED to these. These are not likely to solve the author's

commercial users. I encourage the Board to take close note of the efforts all divisions of ADFG make to assure the escapement goals are met. These proposals are reacting to recent years of unprecedented sockeye runs and modest king runs. Regulations altered to meet relatively rare run strengths are likely to cause more problems than they fix. I strongly believe the continued strength of the Nushagak chinook population is due to having the Chinook Management Plan in place and I am reluctant to see it changed substantially unless biological data warrant.

43 Somewhat Opposed-Nushagak King Plan, commercial sub-districts: While I appreciate the thought and motive of this proposal, given the nature of the Nushagak district, I doubt there would be significant savings obtained in this manner in most seasons. I do believe that in some seasons years ago when the Nushagak River had low flows and the weather was unseasonably warm, a large number of kings seemed to hold in the waters from the upper commercial district to Lewis Point upstream of Dillingham and not moving into the river. However, arbitrarily carving the commercial district into smaller pieces would disenfranchise some set netters and cram the drift fleet into a much smaller area.

My comments for 41, 42 regarding changing regulations after a couple extremely unusual seasons applies here too.

47 Support - Rainbow Plan: The plan is currently implemented and mostly included in the regulation book but the public has a hard time finding it. I vigorously support the overall intent of the plan and I am eager for the public to be able to access it. The plan was years in the making with careful solicitation of a wide range of users and first implemented in 1990 with some subsequent refinements. I think it makes for an orderly and coherent fishery in the region. If it is hard to find there may be a tendency to forget the plan and its intent.

Naknek River Proposals General comment: I have read most of the proposals regarding the Naknek River. It appears with the upswing of the national economy, there has been a resurgence of sport fishing in remote Alaska and particularly easy to access places like the Naknek River. While some tuning of regulations may be needed for the Naknek, the tone coming from the local AC and a few individuals strike me as greatly overwrought. I encourage the Board to take careful and measured actions versus many of the drastic and unnecessary proposals that were submitted.

- **OPPOSED** Prohibit egg imitations: **I vigorously OPPOSE** this silly proposal. It would totally prohibit nearly all lures used to catch king salmon. I am very curious what sort of tackle can be successfully used for king salmon that does not imitate eggs in some manner of color or shape. It would create real and unneeded enforcement problems.
- Opposed Naknek River closed areas for kings: I am opposed. However if the Board chooses to adopt this regulation I highly object to the use of local place names and cabin names in regulations. This can be terribly confusing to the public and should not be used. GPS units and phone Apps are so commonplace that Latitude Longitude or other more clear location identifiers should be used. While I worked for ADFG I did my best to get rid of local place names that are unknown to any other people.
- 62 OPPOSED Removal of Sport Caught fish: I am totally opposed to this unneeded and onerous regulation. I do not believe this regulation is warranted biologically and would prove more harmful than good by making otherwise ethical anglers into criminals. This is just not needed. There are many situations where an angler might put themselves at risk or unneeded difficulty to comply. For example if an angler even accidentally catches a particularly small fish would they be cited for lifting the fish up where it could be more carefully handled and released? Would every little kid be liable for lifting a fish out of the water in their excitement? I support strong public education on the proper handling of fish as a better way to go. Holding a fish up for a photo is a hugely popular and common practice world wide, to criminalize this in Alaska may really hurt our reputation as a fishing and tourist destination for no significant biological gain.