




THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302
Main: 907.789.6160
Licensing: 907.789.6150
Fax: 907.789.6170

To: Glenn Haight
Executive Director
Alaska Board of Fisheries
Alaska Department of Fish & Game

Date: January 8, 2016

From:  Bruce Twomley, Chairman
Benjamin Brown, Commissioner
Commercial Fisheries Entry Commission

Subject: Supplement to December 28, 2015
comments on Proposal 126 for the
2015/2016 A-Y-K finfish meeting

We are writing to modify and supplement our previous December 28, 2015, comments concerning Proposal 126 which seeks to allow addition of purse seine gear as an authorized gear type to the Lower Yukon salmon gillnet fishery during times determined to be necessary for the conservation of king salmon.

We acknowledge that two alternative gear types, dip net and beach seine, have already been authorized for this fishery during times of king salmon conservation. From a recent conversation with Gene Sandone with the Yukon Delta Fisheries Development Association, we are aware that purse seine gear has also been tested for this purpose.

CFEC's concern about proposal 126 arises from the potential for an increase in the fishing efficiency of purse seining over and above dip netting, gillnetting, or beach seine. As you know, Alaska's limited entry program is a license limitation program that, in the salmon fisheries, controls only the number of participants. These license limitation programs work best when supported with "input controls" on effort. The economic and resource conservation intentions of license limitation programs can be undermined if participants can easily increase their fishing efficiency. CFEC's concern about the proposal would be diminished if (consistent with the terms of the proposal): 1) employment of purse seine gear is restricted to times determined to be necessary for the conservation of king salmon; 2) the purse seine gear is restricted to 150 fathoms of net; and 3) ADF&G maintains E.O. authority for the exact place and time for use of purse seine gear.

CFEC would defer to ADF&G managers on the question of effectiveness of purse seine gear to conserve king salmon.