

January 5, 2016

To The Alaska Board of Fisheries Committee on Coastal Erosion Impacts on Set Gillnet Operations:

Thank you for listening to my recommendations regarding set net sites that are affected by erosion.

The set gillnet operations at Graveyard Point are affected not just by erosion but by a boundary line issue and my suggestions speak to both of those considerations. I ask the BOF to consider the broader impact and assess all proposals on a case-by-case basis.

I have suggested the following criteria:

- 1) Would the proposed change not adversely impact escapement?
- 2) Would the proposed change not increase the number of sites historically fished legally?
- 3) Would the proposed change not adversely affect those who historically fished this area?
- 4) Is the history of the site such that fairness calls for making the proposed change?
- 5) Is there any evidence to suggest that the historical point of closure has ever been inadvertently shifted in a way that adds to the erosion's adverse impact on the site?

Assessing proposal 59, to change the boundary line at Graveyard Point, under that criteria:

- 1) ADF&G has acknowledged to the Board that changing the boundary line will not adversely impact escapement.
- 2) The boundary change would not increase the number of sites historically fished legally.
- 3) No one who historically fished this area would be adversely affected by the proposed change. Erosion has shortened the length of beach that is fished but there are the same number of permits currently fishing. So, other sites are in jeopardy of becoming illegal as erosion continues.
- 4) The previous Board Chair and other Board Members have, on the record, expressed their opinions that not changing the boundary line to restore our historical sites would be unfair.
- 5) Please refer to Mr. Jeff Bassett's submitted comments.

Sincerely,

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