



SELDOVIA VILLAGE TRIBE

Tradition Integrated with Technology

November 21, 2016

John Jensen, Board Chair, Alaska Board of Fisheries
 ATTN: Glenn Haight, Executive Director
 Alaska Board of Fisheries
 P.O. Box 115526
 Juneau, AK 99811-5526

RE: Seldovia Village Tribe Emergency Petition to the Alaska Board of Fisheries

Dear Chairman Jensen and other members of the Alaska Board of Fisheries;

Seldovia Village Tribe (SVT) requests as an emergency petition to the Alaska Board of Fisheries (BOF) that immediate regulatory action be taken to expand the allowable spring fishing period and area for the Seldovia Subsistence Salmon Fishery. Current regulations do not provide a reasonable opportunity for subsistence for this fishery.

The BOF established this subsistence set gillnet fishery in 1995. The fishery is located on the south side of Kachemak Bay, near Seldovia, which is in the Southern District of the Lower Cook Inlet Fisheries Management Area. The subsistence fishery operates in a split season. The spring fishery consists of two 48-hour periods each week beginning at 6:00 AM on Monday and Thursday from April 1 through May 30, and targets sockeye and Chinook salmon. The fall fishery targets coho salmon and consists of two 36-hour periods on the first two weekends in August. The BOF has set a guideline harvest level (GHL) for this fishery of 200 Chinook salmon and an annual possession limit of 20 Chinook salmon per household. There are no possession limits for other salmon species.

Seldovians depend heavily on fish as part of their annual diet. A 2004 Cook Inlet Customary and Traditional Subsistence Fisheries Assessment (Fall, et al., ADF&G Technical Paper No. 285) surveyed 50 out of 169 total households and found that 100% of surveyed households used fish during the year. A fish consumption survey conducted by Seldovia Village Tribe in 2012 found an average consumption rate in Seldovia of 53.3 grams of fish/day, which multiplies out to nearly 43 pounds of fish/person/year.

The current regulations governing the spring subsistence fishery pose several challenges for Seldovia residents. The first is the timing of the opening, which occurs early in the season, before many salmon are present in the area. Local residents generally limit their subsistence fishing effort to the last week or so of May, but even then the fish runs often do not arrive until the allotted fishing window has closed. Data



taken from the Alaska Subsistence Salmon Fisheries Reports from the last ten years (2006-2015) show an average annual harvest of just 10.1 Chinook salmon in total, far below the GHL of 200. The average number of returned permits for these years was 10.4, so this works out to an average of just under one Chinook salmon per person fishing per year. The same data show an average annual sockeye harvest of 87.2, or just under 8.4 sockeye per fisherman per year.

Another challenge is the limited area available for fishing. Much of the coastline included in the allotted subsistence area on the east side of Seldovia Bay consists of cliff faces. Only one beach in this section is large enough to operate a set net site, and this beach is heavily used for recreation and camping, has large kelp patches off shore, and is often exposed to heavy surf. The rocky, kelp-covered nature of the intertidal area along this beach limits boat landings and launching to high tide times in calm weather and would interfere with set nets. This intertidal area is also hugely important for local people who gather traditional subsistence foods such as snails, bidarkies (chitons), and limpets, as well as a very popular tide-pooling area. Set net operations would be in conflict with these uses.

Waters within Seldovia Bay are generally considered unsuitable for set net fishing due to the high levels of algae and debris within the Bay. To avoid having their gear fouled, local fishermen concentrate their efforts in the clearer waters between Point Naskowak and a point approximately 1000 feet southwest along the beach. The small geographic area, compounded by the regulation requiring 600 lineal feet between nets, means that some people who would like to participate in the fishery are unable to because of insufficient area to accommodate all would-be participants.

Because of the limitations of this fishery, many Seldovians have to rely on other, less efficient, means of catching fish, or even having to purchase their fish. People pay \$20 a fish for reds and for people trying to fill jars, the freezer, and the smokehouse it gets expensive quickly. For those on a fixed income even this is not a method they can use so they end up going without something that has been a part of the local traditional diet for generations. Commercial foods, especially meat, do not fill the same niche, and because they are also extremely expensive in our community, low-income residents often face severe food challenges. This is particularly true for many of our Elders. Adjustments to the timing and area available for the subsistence fishery would make this fishery more accessible to residents and increase food security in our community.

Therefore, Seldovia Village Tribe requests the Board of Fisheries to make the following amendments to the regulations governing the Seldovia-area subsistence fishery:

- 1) Extension of the fishing window in the spring season by one month, so that the available fishing time runs from April 1 - June 30 each year. This would allow for more than a few days of fishing time during the time when fish are currently in the



area. We request to keep the opening date the same to allow for future uncertainties in run timing, given the dynamic nature of ocean conditions and the forecast that this uncertainty will grow in coming decades. Widening the fishing window to include June, the time when more fish are present in the area, would also greatly reduce the cost per unit effort (CPUE), as residents could gather more fish per trip, reducing fuel costs per fish.

- 2) Expansion of the area in which fishing is allowed, so that the outer boundaries run from a point approximately 500 yards north of Fourth of July Creek (59.4404' N 151.7935' W) to 500 yards South of Barabara Creek (59.4798' N 151.6582' W). This would allow for more residents to fish in areas that are suitable to keeping nets clear of fouling.
- 3) Reduction of the mandatory distance between nets from 600 yards to 300 yards. Like #2 above, this would also allow more residents to participate in the fishery without additional expansion of the geographic area included in the fishery boundaries.

SVT has reviewed the Joint Board's finding on Emergency Petitions and has read the State's definition of "emergency." We consider this request to fit the requirements for an emergency petition because under the prescribed schedule, this matter would not come up for consideration for the Board of Fisheries until 2019, costing the residents of Seldovia another two to three seasons of missed fishing opportunity. The fishery opens again in approximately five months. Many people have not participated in this fishery for several years because of the limited area available that actually provides good fishing, and the fact that the fishing window is out-of-sync with the timing of the main fish run. If the fishery area is increased and the timing is adjusted as per our request, people will need time to prepare fishing gear, which is a time-consuming task. This further increases the need for emergency action on this item.

Thank you for your prompt consideration.

Sincerely,

SELDOVIA VILLAGE TRIBE

Crystal Collier

Crystal Collier
President/CEO



Seldovia Subsistence Salmon Fishery Area



- █ Existing Subsistence Salmon Areas
- █ Proposed Additions to Subsistence Salmon Areas