



THE STATE
of **ALASKA**
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Commercial Fisheries Entry Commission

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

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

Subject: Comments on Proposals 109, 110, 111,
112, 140 and 218, and **amended
comment for Proposal 133** for the
2016/2017 Upper Cook Inlet Finfish
meeting

This memorandum provides comments on proposals the Alaska Board of Fisheries (Board) will consider at the March 2017 meeting for Upper Cook Inlet Finfish in Anchorage.

Proposal 133

CFEC'S AMENDED COMMENT

In general, CFEC has helped disseminate the idea of dual permit operations as an option for restructuring Alaska's salmon fisheries.¹ Under 5 AAC 21.333, two permit holders fishing concurrently from the same vessel may employ a total of 200 fathoms of drift gillnet gear. This represents more gear than a single-permit operation but less than two full complements of gear.

Proposal 133 seeks to allow an individual (one person) holding two CFEC drift gillnet permits the same opportunity to employ 200 fathoms of gear. Proposal 133 could potentially achieve some amount of fleet consolidation and a net reduction in fishing effort.

CFEC supports the proposal as a means to expand opportunities for Cook Inlet drift gillnetters.

¹ For example, see *Outline of Options for Fleet Consolidation in Alaska's Salmon Fisheries*. A special report prepared for the Governor's Salmon Forum. Commercial Fisheries Entry Commission; December, 1998.

THE FOLLOWING PROPOSALS EACH ADDRESS A PERSON HOLDING TWO SET GILLNET PERMITS AND FISHING BOTH SIMULTANEOUSLY (PERMIT STACKING).

Proposals 109, 110, 111, and 112

These proposals address the fishing of stacked permits in the Kasilof River Special Harvest Area (KRSHA). The KRSHA is defined in 5 AAC 21.365 and the waters so defined are within the waters legal for the use of set gillnets in Cook Inlet under 5 AAC 21.330(b)(3)(C)(i – iii).

An entry permit authorizes the permittee to operate a complement of gear within a specified fishery [AS 16.43.150(a)]. When ADF&G opens the waters of the KRSHA in Cook Inlet for set gillnets, a S04H permit holder is authorized to fish a complement of gear there.

By extension, a holder of two S04H permits is authorized under AS 16.43.150(a) to fish one complement of gear for the first permit and another complement of gear for the second permit. When the KRSHA is open for set gillnets, a holder of two S04H permits is authorized to fish two complements of gear there.

Proposal 140

This proposal seeks to change the specifications for set gillnet gear to allow for a longer length (aggregate length of 135 fm) in tandem with a shallower depth (29 meshes). The purpose is for conservation of king salmon.

In general, CFEC advocates that limited entry works best when input controls are maintained on the amount and type of gear. While it is unknown whether this proposed new configuration of set gillnet would actually result in less take of king salmon than the traditional configuration of 105 fm by 45 meshes deep, Prop 140 could result in an increased amount of the total fathoms of gear placed in the water. Because of this, CFEC reserves support for the proposal. If it can be demonstrated that conservation can be achieved with the proposed new configuration, then the Limited Entry Act may be sufficiently upheld so that CFEC could support the proposal.

Proposal 218

Regulation 5 AAC 21.366(a)(5) does not allow a CFEC permit holder to operate more than one set gillnet at a time during the king salmon fishery in the Northern District. Prop 218 seeks to change or rescind this provision.

Under AS 16.43.150(a), an entry permit authorizes the permittee to operate a complement of gear within a specified fishery. When ADF&G opens the Northern District in Cook Inlet for set gillnets, a S04H permit holder is authorized to fish a complement of gear there.

By extension, a holder of two S04H permits is authorized under AS 16.43.150(a) to fish one complement of gear for the first permit and another complement of gear for the second permit. When the Northern District is open for set gillnets, a holder of two S04H permits is authorized to fish two complements of gear there.