

NORTHERN DISTRICT SET NETTERS ASSOCIATION OF COOK INLET

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Est. 1954

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Alaska Board of Fisheries
Alaska Department of Fish and Game
Anchorage, Alaska

SUBJECT: Proposals 218 – 5 AAC 21.366 Northern District King Salmon Management Plan

We are writing to ask the Board of Fisheries to reconsider Proposal 218 based on new information.

When the Board of Fisheries permitted one UCI set net fisher to have two permits in 2011, we understood this action included the right to fish the gear associated with those two permits, both in the Northern District King Salmon fishery and throughout the regular season. There was no reason to think otherwise because that was the purpose of one person having two permits – to be able to fish the gear for both permits.

When it was brought to our attention in 2016 that the 1986 Northern District King Salmon Management Plan had outdated language and referenced gear per permit holder (e.g., person) and not gear per permit, we submitted Proposal 218 to update the original 1986 language to reflect the intent of the 2011 regulation allowing two permits per person.

The failure of Proposal 218 is a Northern District set net family hardship and safety issue; not an issue of increasing gear in the fishery. There are very few dual permits in the Northern District, and they are related to family set net operations.

Both permits are in the family set net operations in family member names, but two are in specific family members names for multiple reasons, including safety of traveling back and forth to fish camps in open skiffs in periodically rough water, especially for elderly family members, family members not able to go each fishing period because of school or employment schedules, and thus unable to be on location for all periods. In these cases, the second person does not have to travel to the fish camp for the family set net operation to efficiently function.

Furthermore, with the denial of Proposal 218, the six Northern District set netters with dual permits must transfer their permit to another person's name to fish the gear in 2017. That takes a 60-day Notice of Intent to Transfer with CFEC and then the transfer. There is hardly time to do this before the season opens.

In addition, a permit transfer entails transferring an Alaska DNR shore fishery leases associated with the permit, another timely and costly activity.

Why would the Board of Fisheries grant a second set net permit to a person and then deny the gear associated with that permit?

The failure of Proposal 218 to pass makes it inconsistent with what the Board of Fisheries did with Proposal 109.

All of this adds up to differential treatment of Northern District set netters who were simply trying to update 1985 language with 2011 Board of Fisheries regulation, not expand a fishery.

The Department monitors the weekly escapement and catch of king salmon closely, and if the run is weak, the Department issues restrictions as appropriate.

We respectfully ask for reconsideration of Proposal 218.