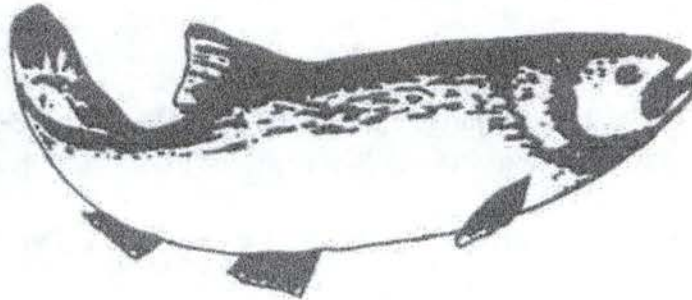


NORTHERN DISTRICT SET NETTERS ASSOCIATION OF COOK INLET

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12 February 2014

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

SUBJECT: Proposal 293

The Board of Fisheries passed Proposal 293 on 2/12/14 that asked to:

*Modify management plan to restrict commercial set gillnet fishing to one regular 12-hour period per week in the Northern District if sport fishing in the Little Susitna or Deshka rivers are restricted to artificial lures; **OR** close Northern District to commercial fishing, if sport fishing is closed in the Little Susitna River, Fish Creek or Deshka River.*

Our association wonders if all board members understood how this action affects the Northern District set netters?

New Information on the effect of this proposal on Northern District Set Netters:

August coho is a very important component of our commercial fishery. In fact, coho is a historic mainstay of the Northern District commercial fishery.

The Northern District Salmon Management Plan has a provision that restricts Northern District nets from three to one net to reduce sockeye salmon, and this provision extends into coho season, the plan does not allow extra periods where coho primary target, and it does not allow any extra periods after Aug 15.

Northern District fishers provided testimony that they are a historic coho harvester in August and rely on regular access (two days per week) to their fishery to sustain local markets.

Consider the timing of Northern District fishing as affected by this proposal:

July 21 to August 6: By regulation, the Northern District is restricted to one net, instead of three nets, to conserve sockeye. Thus, at the peak of the Northern District set net fishery, gear is reduced by 66 percent. The Northern District set netters adapted to this restriction because it allows continuous fishing (e.g., two each 12 hour periods per week) that provide for continuous sales to existing markets.

August 7: Northern District returns to three nets. Fishers have been waiting for 17 days to return their full complement of gear.

Impact of Proposal No. 293:

With the passage of Proposal 293, the Northern District set netters lose 50 per cent of their commercial fishery after August 1, if two (2) Northern Cook Inlet stream go to artificial lures!

This action is unprecedented in its harshness towards the Northern District commercial fishery.

After fishing since July 21 with 33 percent of the regular gear, now, if two streams go to lures, the Northern District would lose 50 percent (one period per week) of their fishing periods after August 1.

According to the ADF&G 2010 Anadromous Waters Catalog, in the Northern District (District 247) there are 809 coho salmon-bearing streams. The Northern District commercial fishery fishes on a multitude of coho stocks spread throughout the District.

Now, if two of those 809 streams goes to lures, the entire Northern District is closed for 50 percent of its openings!

The Northern District relies on being able to fish twice a week to sustain itself and markets.

The same applies to closing the Northern District commercial fishery if the Little Susitna, Fish Creek or the Deskha are closed to sport fishing. This results in closing the entire commercial set net fishery based on three stocks.

The Department has EO authority and **has used it as needed** to protect Northern Cook Inlet coho.

In short, to take away, by regulation, 50 percent of the Northern District fishing periods after August 1 if two Northern Cook Inlet stream goes to lures and to close the entire Northern District if one of three streams are closed to sport fishing will put an undue hardship on and threaten the viability of the Northern District commercial fishery.

We respectfully ask for reconsideration of Proposal 293.