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September 28, 2017

Chairman John Jensen, Alaska Board of Fisheries
Board Support, P.O. Box 115526
Juneau, AK, 99811-5526 Emailed via pdf attachment to dfg.bof.comments@alaska.gov

Re: Requesting the Board of Fisheries Reject Agenda Change Request 12

Dear Chairman Jensen,

We urge the Alaska Board of Fisheries to reject ACR 12 at your October 17-19, 2017 Work Session. This ACR does not meet Board criteria found in 5 AAC 39.999, for approving an agenda change Request.

Last year at the February 2016 Board meeting, the Board encouraged salmon fishery stakeholder groups from the South Alaska Peninsula area and Chignik area to find a compromise solution that would restrict commercial fishing in the Dolgoi Island Area to allow additional sockeye salmon to potentially travel to Chignik, while still allowing harvest opportunity for South Alaska Peninsula fishermen. The new regulations were in place for the 2016 & 2017 salmon seasons.

ACR 12 proposes to radically change the mutually agreed upon Doloi Island Area regulations. ACR 12 is predominately allocative and therefore should not be approved at this time. We believe this ACR does not meet the Board's criteria for accepting an ACR:

- There is no fishery conservation concern. This new regulation established only last year is working as conceived. Dolgoi fishing is restricted and Chignik escapement goals have been met.
- There is no error in the regulation – the Board was diligent in promulgating the compromise proposal into regulations, and the Department has been careful to enact the rules as written.
- There were no unforeseen effects on the salmon fisheries from this regulation. Both the 2016 & 2017 salmon seasons were unique and surprising, but not as a result of these regulations.

There are plenty of problems with this ACR, however we would prefer to debate the merits of the proposal during the next meeting cycle, when it would regularly come up.

At the February 2019 Alaska Peninsula/Chignik Fishfish meeting, the Board will have three years of data under the new regulations to better inform the next decision on this issue.

We respectfully request the Alaska Board of Fisheries reject ACR 12 at the 2017 Work Session. Thank you for the opportunity to provide written comment.

Sincerely, 

James Kenezuroff
President