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VIA FACSIMILE ONLY

Alaska Fish & Game
Sportfishing Department
Juneau, AK
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Re: **ACR10**

Dear Distinguished Board Members:

I represent Goodnews River Lodge and have been asked by Michael Gorton, the Lodge's owner and operator, to submit the Lodge's position with respect to the proposal to close the Goodnews River drainage from September 1st through September 30th ("ACR10").

As you may know, the Goodnews River Lodge has been in business on the Goodnews River drainage for over forty years. The Lodge's owners have a long-term lease and bring sportsmen in each summer for salmon and trout fishing on the Goodnews river. Throughout its history, the Goodnews River Lodge has always attempted to be good neighbors. It provides substantial support to the Goodnews Village and routinely assists its residents by providing fuel, food, and money for scholarship programs. The Lodge donates \$8,000 worth of meat to the village each year, and another \$5,500 annually for Christmas presents for village children. The Lodge is committed to being a good neighbor and has a substantial interest in all aspects of the Goodnews River drainage.

ACR10, if passed, would have a substantial negative impact on the Goodnews River Lodge. As with all Alaska lodges, the salmon fishing season on the Goodnews river is short and requires the lodge to generate as much revenue as possible to continue its operations. The Lodge is usually closed by the end of the second week of September, but having the river closed to boat traffic from September 1st through September 15th would create an undue financial burden and hardship on the lodge. This concern is exacerbated by the warm weather in recent years which has delayed the major push of silver salmon compared to prior years. September 1st through the

15th can be some of the best silver salmon fishing on the Goodnews river and for the lodge to continue operating, it needs to maximize its revenue during this crucial period.

With numerous guides on the river each day, the Lodge has firsthand knowledge concerning the impact boats on the river have on the moose population. Because there are fishermen on the river throughout the summer, the noise of boats is a normal occurrence to which the moose population has adjusted. When the guides are traveling up the river in their powerboats, the most reaction they usually get from a moose is the lifting of a head or taking three steps into the brush, only to come back to the river's edge as soon as the boat has passed. The moose population in the Goodnews basin has learned that boat traffic does not present any type of threat, and they have become essentially immune to the boat noise from the Goodnews River Lodge's guides.

Based on many years guiding up the river, it is abundantly clear that the large part of the moose population does not leave the lake area until after the weather cools in the latter part of the fall season. In fact, most of the moose that are coming down from the lake have not even arrived in the lower part of the Goodnews drainage until the latter half of September or early October. With the summers now remaining warmer later into the year, I would expect this migration cycle to lengthen. Because most of the moose are still up in the lake area during the early parts of September, the lodge's operations do not in any way affect their migration into the lower valley or have any detrimental impact on moose hunting during the September and October timeframe.

As a lodge, we greatly respect the local wildlife and feel it is an added asset for our guests. It was not that long ago that there was closure to moose hunting in the Goodnews basin because of a lack of moose population. We are happy to report that over the last few years, more moose have migrated into the valley, which has increased huntable moose populations in the lower Goodnews River drainage. The moose that are migrating into the valley, however, do not really hit the lower Goodnews river below the Togiak Refuge and around the area of the lodge until late September.

We greatly respect the efforts of the Board and its ability to consider everyone's interest when formulating these types of policies. Unfortunately, some policies which may seem reasonable on their face have unintended consequences that can be detrimental to others in the community. If the lodge is forced to shut down and cease all operations by September 1st, it will no longer have the financial resources to provide the aid that it currently gives to the Goodnews Village.

It is important for everyone in our community to be good neighbors and take into account everyone's interests in this wonderful resource and special waterway. Policies that favor one user group over others on public waterways, especially without biological support for the requested change, should only be implemented if absolutely necessary. With the lodge usually ceasing operations approximately ten days into September, its impact on moose hunters coming from the village during the two-month season is limited at best. The effect of closing the river to boat traffic on September 1st, to the contrary, could be a fatal blow to the lodge's business and

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the crucial support it provides to Goodnews Village. With these considerations in mind, the lodge respectfully requests that ACR10 not be considered or passed.

Lastly, we would like to stress that the lodge understands its role in the community and throughout the years has attempted to be a good neighbor and support the village. As of now, the status quo is working.

Thank you for your time and consideration of this important matter. We look forward to continuing to work with you to make the Goodnews River drainage a paradise for all users.

Very truly yours,

A handwritten signature in cursive script that reads "Michael J. Bononi".

Michael J. Bononi
BONONI LAW GROUP, LLP

cc: Michael Gorton