

November 14, 2012

Alaska Dept. of Fish & Game
Boards Support Section
BOF Comments
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Honorable Board Members;

I am a representative of the commercial sport fishing user group and have been an active participant in this group in the Bristol Bay area for 25 years. I have been active at these board meetings for close to the same number of years and I respectfully submit the following comments for your consideration concerning the listed proposals.

Proposal 2 - I strongly support this proposal. I feel anytime you have an opportunity to keep people on the proper side of the law; you should seize that option and give them the opportunity. This proposal takes very little away but confusion as to where it is legal to fish and retain rainbow trout. We have numerous other watersheds that have successfully gone to catch and release fisheries to protect native stocks and this would be no different. The author is also allowing for subsistence take to continue on dolly varden and grayling which should make this proposal very palatable for all user groups.

Proposal 4 - I strongly support this proposal and have been asked to speak to the proposal in the absence of the original author. The strongest arguments have been made in the original proposal and I would concur with his observations. I would also add that when chumming happens, it really diminishes the guides roll in the field. As guides, it is our responsibility to teach and protect our clients while in the field. If you are providing fish with free food while fishing over them, it totally makes our job of teaching disappear and let's face it, you have to question the ethics of the sport fisherman when this is being done and that is something I would prefer not to have questioned, my or my crews ethics in the field. I think removing this temptation will add professionalism to our job.

I also recognize that in order not to accidentally involve folks who are incidentally cleaning fish in an area that is being fished, we will need to revise the language of this proposal. There are times when fish parts need to be placed in the water and those individuals should not be punished for this practice. I have faith that if

we all sit down in committee and wrap our multiple and well versed brains around this issue, we will be able to come up with a definition that will successfully protect those who are innocently cleaning fish while properly persecuting those who are using questionable practices. I think this distasteful practice deserves at least a shot at being addressed and hopefully defined.

Proposal 9 – I am intrigued by this proposal, perhaps because I submitted one that was somewhat similar for the Naknek River 21 years ago. I support the idea of maintaining quality of experience for all Bristol Bay fishermen, but how we get there is a much more troubling discussion. My proposal was limited to the upper reaches of the Naknek River only and limited to specific dates. It was received with disgust or skepticism by some and embraced by others, that was about 21 years ago. It may be time to have this discussion again and I would welcome the opportunity to be a part of it. I realize I have not necessarily made a statement as to my standing on this proposal and if brought to the table I would have to say that I am somewhat in support, but only if proper, all encompassing, regulations and definitions were in place and I really don't see any of those elements currently present.

Proposal 76 – I would support an amended version of this Proposal. Having been involved in the Naknek River fishery for the past 25 years and being a local resident, lodge owner and subsistence user as well, I am fairly knowledgeable in how we got to where we are right now in our management plan. The escapement of king salmon on the Naknek River has long been an issue that has ultimately been decided by the sockeye commercial fleet openings schedule and the lack of the Department's ability to monitor the specie specific current escapement with any confidence. It is very frustrating as a guide or sport fisherman to be told that they cannot allow too many sockeye up the river, regardless of where the king escapement might be sitting. Basically king salmon are treated as a secondary fish with sockeye being ultimately treated with all regard.

I have made the argument in the past and would advocate it once again for our future, that it would benefit both user groups and species of fish to window specific openings that were mandatory to be left open in the interest of enhancing the king salmon escapement. The last time I made the case, I believe I was told by the Department that the kings tend to enter the river primarily on the crest of the tide and I would support a reasonable time period during this period of every tide that no commercial fishing would occur, specifically to enhance the king salmon escapement.

Proposal 77 – I support this proposal as a valid option for all user groups to "share the burden of conservation". It has long been seen, throughout Bristol Bay, that the burden of conservation for king salmon stocks is placed upon the sport fishing group in order for the commercial fleet to efficiently persecute the sockeye salmon harvest. I have never challenged or questioned the right of the

fleet to harvest as many sockeye salmon as possible as long as the escapement goals were met. I have however, and will continue to challenge the right of the commercial fleet to achieve their goals concerning sockeye salmon at the expense of other species.

On occasion throughout our even recent history, other salmon stocks health has been set aside in the interest of making maximum use of a sockeye salmon escapement. The first one that comes to mind is the Muklung River Chinook. It was decided that these fish were basically a stock that did not need to be protected because it was not used by enough sport or subsistence users to be of any significance and the Wood River special harvest area was implemented with the acknowledgement that they might basically wipe out that Chinook run. I have not recently questioned the health of that run since this decision was made, but I think it might be time we revise and examine our motives in Bristol Bay in regards to ALL our salmon stocks, not just the ones that make the majority of the income for the commercial user.

Proposal 239 - I strongly disagree. I see nothing in this proposal that will advance the future of the king salmon in the Nushagak River. By limiting opportunity for sport anglers, you are affectively helping the king salmon by such a minute amount it could be considered nonexistent! Bristol Bay sport fishermen have historically been very conservative and conscientious. Many of the streams in the area that are now restricted to catch and release only were being used in that manner, voluntarily, prior to the regulation being placed upon the watershed. The same can be said about the manner in which sport anglers proceed in a watershed where they have no intention of retaining fish.

A large number of my guides practice catch and release on the Nushagak river. They use single hooks, by choice, in the interest of doing minimum damage to the fish. For the board to assume that we need to remove bait and treble hooks on the Nushagak fishery in the interest of conservation says to me that we have a board filled with commercial fishermen's interests who don't want to share the burden of conservation.

If the true interest of the board is to conserve the king salmon stock, they need to look to the bay and become seriously interested in monitoring home packs and fall out mortality related to kings captured in the commercial nets. With the efficiency of the commercial fleet in Bristol Bay, just a few days of maintaining a king free strategy in the commercial nets could easily double any conservation efforts the sport fishery could offer by the implementation of this season long regulation. Let's take another look at the commercial side of this option, one that would potentially affect the fleet for only a few days, before we go implementing regulations on the user with the least impact.

Thank you for your time in considering these comments; I look forward to having the Board of Fish visit us again in King Salmon and look forward to a productive meeting during your stay. I will be happy to participate in the above or any other issues you might find my presence helpful.

Sincerely,



Nanci Morris Lyon
Alaska Sportsman's Bear Trail Lodge
P.O. Box 221
King Salmon, AK 99613
907-246-2327