

Dear Commissioners,

Thank you for the opportunity to comment. I would like to comment on Proposal 377 to allow purse seines to be used to harvest summer chums on the Yukon River.

I am the plant manager at the fish plant in Kaltag. Although we may benefit if the lower river cannot harvest the chum quota, I am in generally favor of supporting a seine opportunity for the people who live there. I have concerns, but I think many of my concerns can be addressed and the Board has more than sufficient experience to address issues associated with purse seining.

First, I would like to see the villages and their people on the lower river have the opportunity to harvest fish, and feed their families. To do otherwise seems a little cruel.

If the killing of single Chinook caused the complete closure of the salmon fisheries in Kodiak, Dillingham, Kenai, or Petersburg, these communities would pay brutal price economically and socially. We do not ask them to pay the ultimate price, but only insist they harvest the minimum number of Chinook possible, and we make them change their fishing practices, if needed to protect the resource. Complete salmon closures are the last resort, and this makes for a good policy statewide and prevents the human suffering of losing one's only income and often lifetime investment in boats and equipment.

I have read all the comments, and many of them are well intentioned comments, but there is a pattern. Most comments including the comments from the lower river are from people who have not had any first-hand experience with purse seines. It seems like a little education is in order.

In my 42 years of fishing, I have had significant experience with purse seining in PWS, Southeastern Alaska, Puget Sound, and San Francisco Bay, including the live capture and tagging of chums salmon. I also have experience with gillnetting, trolling, longlining, crabbing, jigging and now fish wheels. Too often fishermen who use one gear type or another try to put on halos, to make themselves better because of the gear type they use. These are political halos looking for more allocation.

Scientific halos are a better pursuit, and when it comes to harvesting methods or gear types there are only two basic categories. Fishing gear which deliver the fish to the boat alive, and those which deliver the fish dead; Fish wheels, purse seines, crab and cod pots, and trolling are the best examples of gear types which deliver live fish to the side of the boats. Trawls, gillnets are two examples of gear types which deliver predominantly dead or dying fish to the side of the boats. Set gillnets in rivers, have only recently been discovered Canadians to have a particularly high hidden mortality. Good science is the key, and not political science.

Fisheries scientists worldwide utilize purse seines effectively for tagging fish specifically because they produce high survival ratios of fish released. This is not an accident, and there is deep scientific evidence to support the use of purse seines to release fish alive successfully. ADFG staff should be able to verify this statement easily.

Having said this though there is a critical caveat. Fish seined commercially and fish seined for tagging are handled differently. The Canadian DFO in British Columbia has studied this extensively starting in the late 90's. By 1999 millions of dollars had been invested and the following was reported:

"By using new selective gear and standardized handling practices, seines may realistically achieve near-zero mortality of non-target species."

Link: <http://www.dfo-mpo.gc.ca/Library/243234.pdf>

The keys to zero mortality are clear. Education, gear modification, and handling practices.

One of the most difficult challenges for the Board is finding fishermen who are willing to change. This proposal is along with the dip net fishery, is a clear sign that there is a willingness to change. This is a really good sign, and in my opinion the Board should encourage a willingness to change – statewide. Changing gear types, methods, and handling may hold the key to rebuilding isolated fish stocks, without the blunt tool of closing fisheries entirely.

Last year's proposal for beach seining was offered with the best intentions and a willingness to change, but the proposal did not have any real world experience behind it.

Canadian DFO fisheries scientists have a lot of experience with "selective fishing", and are a decade ahead of most states. It is good science, and in this case it can be utilized to alleviate poverty.

My fear is that we know that purse seining has the proven scientific ability to harvest salmon and release non-target species successfully, but we do not act on this knowledge. When visiting these remote villages, one cannot fail to notice the poverty. It is hard to believe this is America, which is so wealthy. Separating these villages from their natural resources seems to be morally cruel, unless there is no other alternative. Fishermen from Kodiak, Chignik, False Pass, Nushagak, Kuskoquim, and Norton Sound likely kill a handful of Yukon Chinook, not to mention the fisheries in Federal waters.

Most are only a handful of Chinooks, and closing any of these fisheries with an effective "zero tolerance" policy toward incidental harvest of Yukon Chinooks would be incredibly harsh, and if purse seines can be effective in the lower Yukon, with the same impact as these fisheries, then fishermen would be treated the same everywhere.

Let's get a small test fishery, with an educational, handling practices, and gear modification components, and then make a decision based upon good science. We need data, and if we don't get it, we will never know if we could make a difference in the economy of this region.

I would recommend a one or two boat fishery with monitors and requirements that mirror the science from DFO in British Columbia. No sense re-inventing the wheel. This is a low risk solution, and would produce verifiable data to guide the Board in the future. We supported the chum salmon fish wheel fishery on the upper Yukon when they agreed to man their wheels full time and release the Chinook salmon for precisely the same principles as I have laid out above.

Good luck, and thank you for the opportunity to be heard,

Doug Karlberg

Yukon River Gold LLC

PO Box 41

Kaltag, AK