

Dear Mr. Chairman

The proposal 375 is not needed. The regulation as worded now is designed to allow navigation and does not take away fishing opportunities. The current regulation still allows for boat traffic inside of 1000ft, if they chose to use it, and in that respect I feel it was a success.

After listening to the public debate from the December 2012 BOF meeting, in passing the original proposal, the discussion of allocation which Mr. Kluberton commented on was to deal with navigation but not limit fishing opportunity. His words were, he did not feel it was allocative as only the anchors were being move. (Reference audio recording Day 8 2:08:19) I took this as an understanding that the regulation the BOF adopted in 2012 was not to restrict fishing opportunities but to allow for boat traffic to pass inside of 1000 ft; that was accomplished.

Board members did not take into account that in Bristol Bay you are allowed to fish 2, 25 fm nets in a setnet fishery, which we have always done. At the time it did not occur to me that I could fish one 25 fm outside of the 600 ft running line. When I tried to anchor one running line as a test from 400 to 1000 ft my 700lb anchor with 2000lb chain would not hold 2, 25fm nets without dragging so I was limited to one 25 fm net. It was not until later in the season during some minus tides that I could get into waste deep water and put in an auger at 1100 feet to help hold the running line.

Most of the fish were being caught beyond 600 ft so I was figuring out to catch the fish and allow for what the Board wanted. I came up with a 25 fm net with no running line thus allowing the boat traffic to run just outside of the main buoys at 600 ft. I basically had a corridor for boat traffic off the 600 ft running line, which they could choose to use, but besides tender traffic we saw almost no one using it.

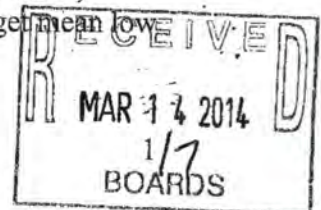
See Figure 1 please note the navigation corridor for boat traffic in side of 1000 ft.

After the October Work session I saw it as critical to bring the Board a fact based 'picture' of the Ugashik River, with its depth and lay out of nets.

I used a transit and took water height at mean high water 11-2-2013 @18.37ft @ 3:13PM and a mean low water 11-3-2013 -0.09 @ 8:25 AM and came up with 12 ft rise. I took the measurements at actual high and low as they are different than book time. I then used a navigation program Open CPN along with Google Earth map to chart water depth and GPS points to give the Board an understanding of the water depth in the Ugashik River. By keeping track of the stage of the tide I took the readings I could subtract and come up with depth at mean low water depth.

These readings were taken on a calm day after a period of calm days. If you reference 5 AAC 39.995 you will see that all regulations are based on a mean low water and not on minus tides. (I can provide the full procedure I went through to keep this fact based).

There is some slight error as I took a linear line for the tide in subtracting to get mean low



water. This was the best I could do with the equipment I had. It still shows the main channel is approximately 300 ft off the East bank and gradually shallows up to the far side of the river about 1900 ft off the east bank. You can clearly see a sand bar at about 1200 ft off east bank at mean low water. There is still water to travel with a skiff, with a 2-3 ft draw, at 1000ft but the water is 2 to 4 ft deep so it not the channel.

5 AAC 39.995. Water depth. Unless otherwise specified, water depths in 5 AAC 01 - 5 AAC 39 are to be measured from mean lower low water.

See figure 2 please note water depth through the width of the river for depth at $\frac{1}{2}$ book tide on an average tide. The water rises from 1.5 to 4 ft per hour depending on the size of the tide **on a 18 ft tide water rises about 2 ft per hr.**

Water rises faster at the beginning of the tide than later on the tide.

See figure 3, for depth at mean low tide.

Please note:

- That there still is a 3 to 4 ft of water depth at 1000 ft, at mean low water.
- That the channel is within 300 to 400 ft of the east bank.

Commercial fishing usually starts at low water and quits at just after high water. Fishermen are going to their sites at low water which they can travel inside of 400 ft or outside of 600ft. After they pick their nets they can go to deliver in the same way or run outside of 1000ft, as there is 9 to 15 ft of water past 1000 ft, depending on the tide. I cannot understand when they say they are running a gauntlet when they are delivering there fish as most of the fish are caught on the flood. My observations of boat traffic are that most travel well outside of 1000 ft the majority of the time. The only time I see them traveling inside of 1000 ft is when the tide is extremely low or they are going to and from the East beach. The drift boats that come up river, only during extended closed drift periods, are few, less than 6, in number and only 1-2 come into the set net sites. They complain about not being able to run a 'straight' line and yet are there for less than a dozen days total.

As far as the complaints from Department test fish crew I cannot understand what they are talking about, as per the Regional information Report No. 2A03-21 on how the test fisheries are run in Bristol Bay Ugashik procedures are on page 14

Ugashik. We currently drift 1.5 h before NBCP high slack tide with high slack tide water levels above 5.2 m, and 2 h before NBCP with high slack tide water levels 5.1 m and below. High slack tide at the Ugashik test fish site occurs about 45 min before the published high slack tide at NBCP (Tables 6 and 7). In 2000, the average time to complete 4 drifts was 63 min and in 2001 was 51 min. The crew finished their drifts an average of 13 min beyond high slack tide in 2000 and an average of 21 min beyond high slack tide in 2001. We also observed that tide level < 5 m would occur about 1 h before NBCP and any tide > 5 m tended to be about 30-45 min before NBCP. This suggests we add an additional 15 min to our present drift schedule.

The above procedures are the same now as they were in 2003; if they change them none of the old data could be used as a reference. With these procedures it shows that the department is leaving the village to start the test fishing just before high water. They then deliver any fish they catch and are back in the village just after high water. I cannot understand why they are having navigation problems when they are pretty much traveling at high tide.

Looking at the time of the high tides there were was only a handful of days when they would not be traveling on the river in light and those days that it was not daylight it never got to true darkness where they could not see the bank of the river. All of the anchor buoys, including ours, are required by regulation to have lights attached, which they do. Also the test fish boat has GPS, lights and fathometers on it. I am not sure if the crew is totally aware of how to use this equipment if they are having this much trouble.

The original regulation as passed worked to allow for navigation and did not limit fishing opportunity it maybe was not as convenient as some would like. So I have 3 other options which I hope will take care of some the inconvenience. No matter what you do it will not stop the complaints the department get about us fishing as they can look back over 40 years and they will see cycles of complaints this is just the latest cycle.

Roland Briggs

Figure 1 Set net Configuration 2013

Ugashik set net configuration in 2013 fishing season
Showing a navigation corridor just outside of 600ft and inside of 400 ft
For boat traffic. All lines are to scale

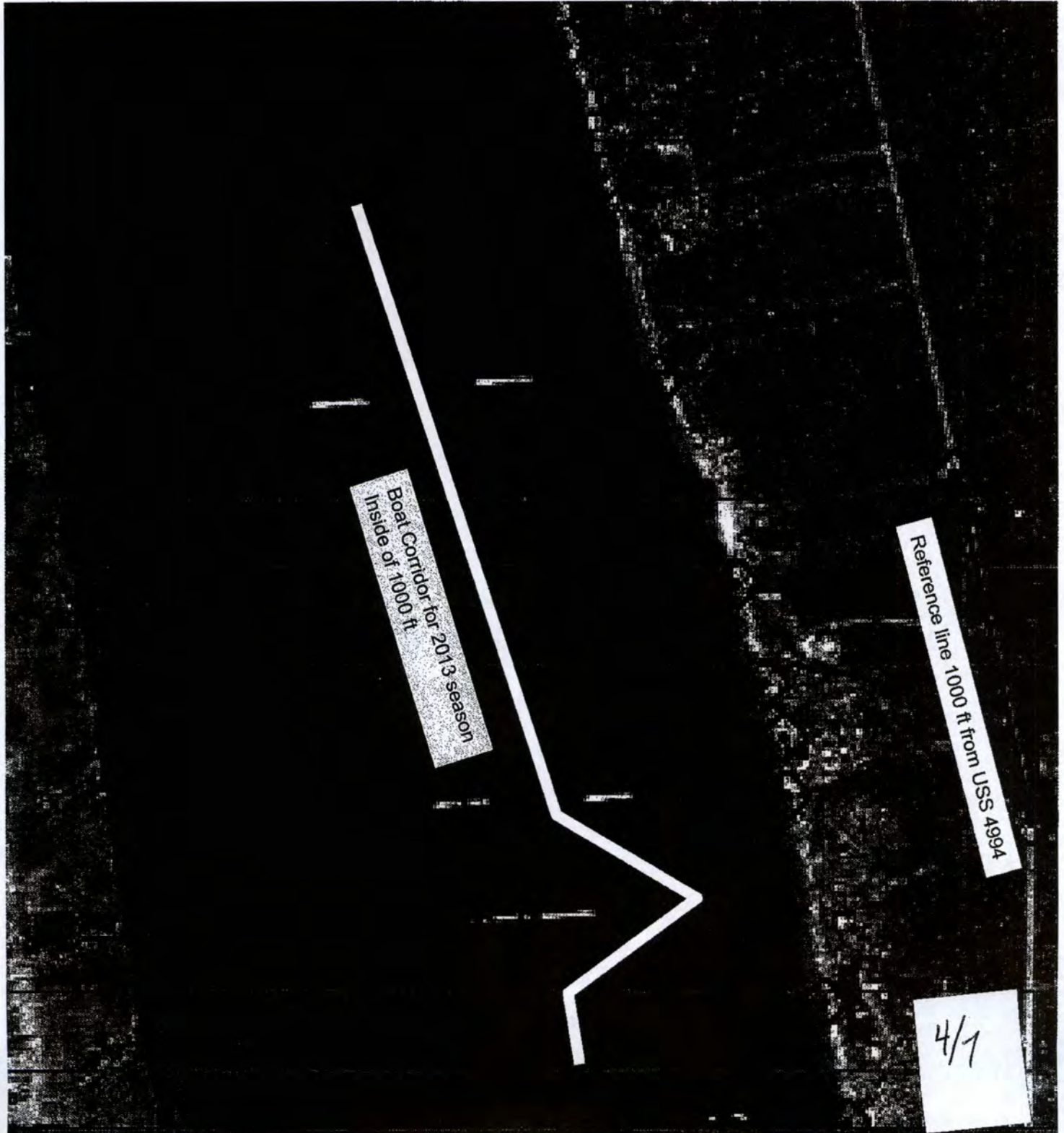


Figure 2 **Water depth at 1/2 tide on 18 ft tide**

Depth taken on 11-3-2014 Approx 3/4 Tide From Nush-Clarks Pt table
Low tide 8:25 AM -0.9 ft Tide floods about 1.5 to 3 ft per hour.
High tide 3:04 PM 19.5 ft
Water depth change from Mean low water to Mean High water is approximate
12 ft at the village of Ugashik
For Mean Low water subtract 9 ft

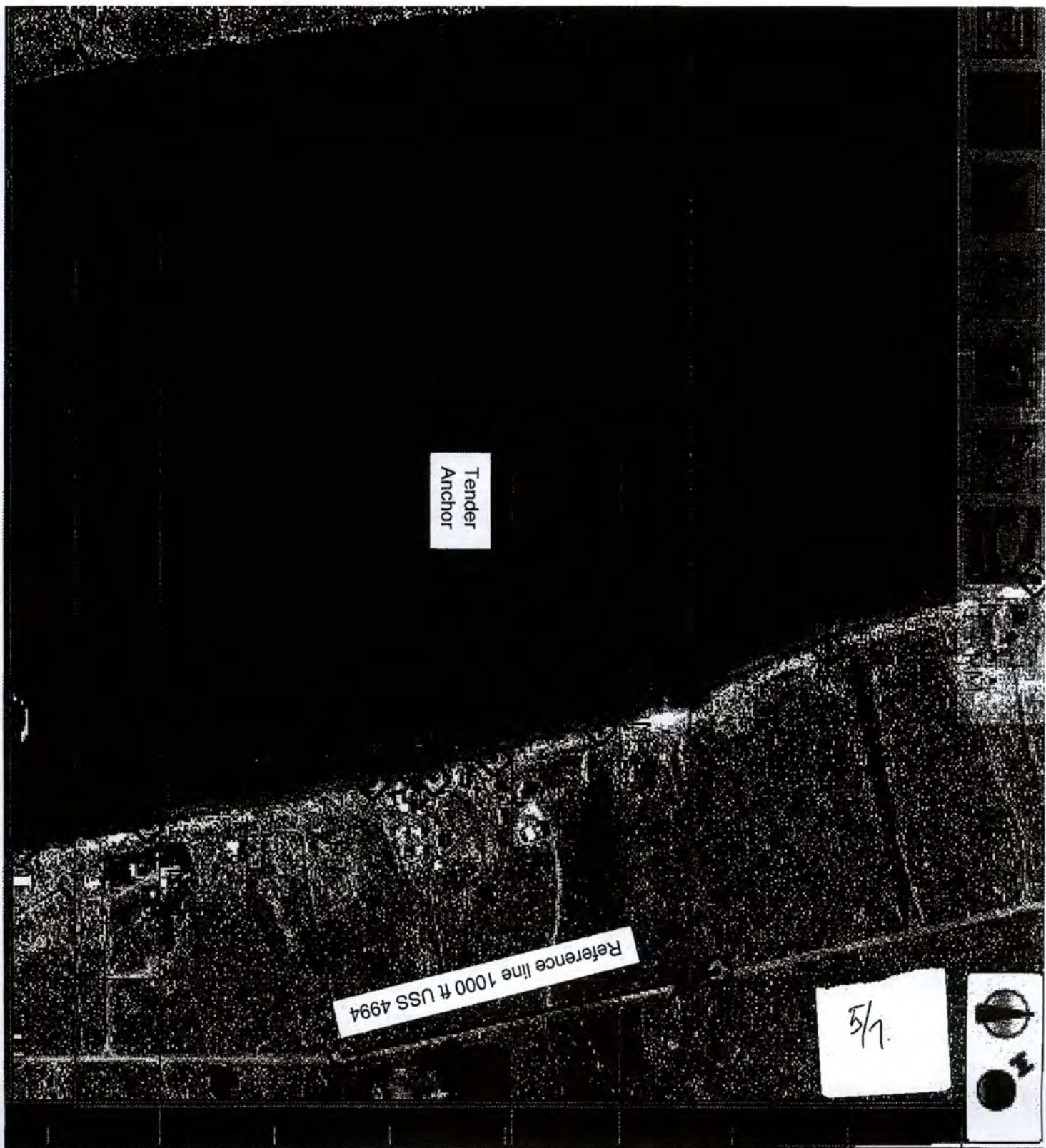


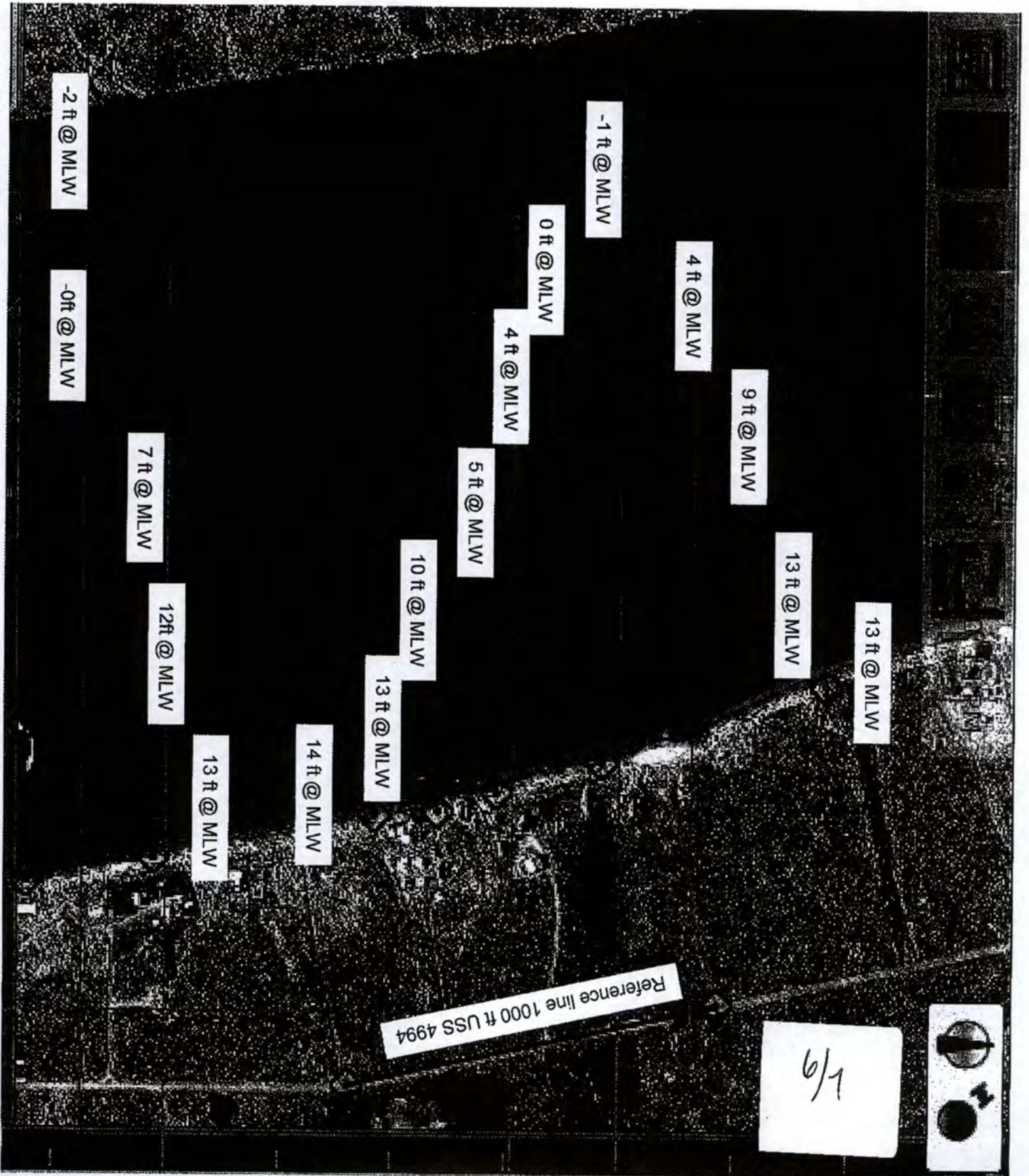
Figure 3 water depth at Mean Low Water

Depth taken on 11-3-2014 adjust to MEAN LOW WATER

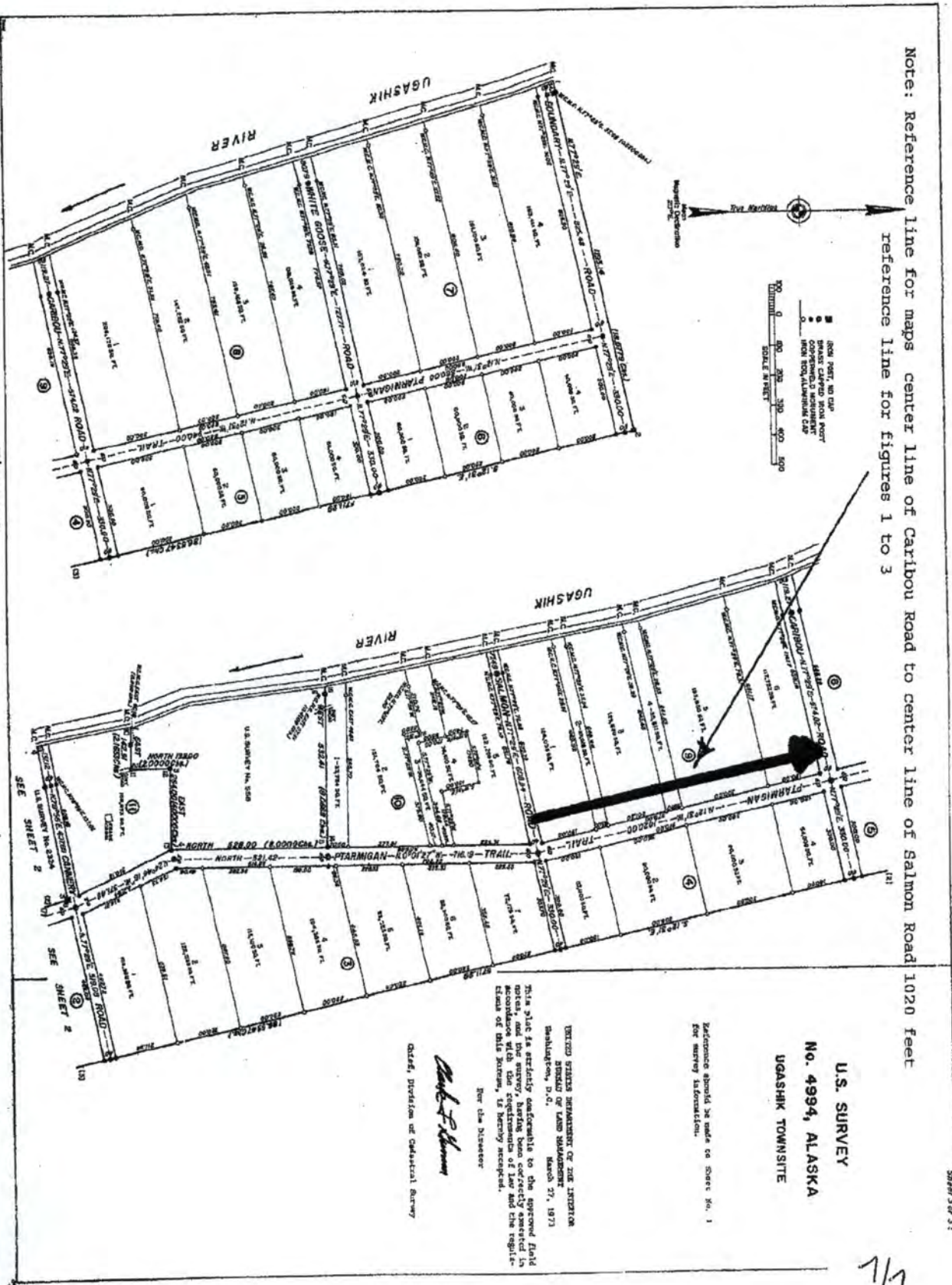
Low tide 8:25 AM -0.9 ft

High tide 3:04 PM 19.5 ft

Water depth change from Mean low water to Mean High water is 12 ft at the village Of Ugashik
Shows the channel is along the EAST SHORE DEEP PART WITHIN 400 FT OF SHORE.



Note: Reference line for maps center line of Caribou Road to center line of Salmon Road 1020 feet
reference line for figures 1 to 3



U.S. SURVEY
No. 4994, ALASKA
UGASHIK TOWNSITE

Reference should be made to Sheet No. 1
for survey instructions.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Washington, D.C. March 27, 1971

Paul F. Williams
For the Director
Office, Division of Geospatial Survey

Figure 4