

Mr. Chairman

With reference to staff comments RC2 (concerning proposal 375); \*comments made on pg 100 are incorrect on a few accounts.

Effect if the proposal were adopted- The main channel of the river, as it travels through the stat area 321-50, is off the East Shore approximately 300-500', NOT off the 600'+ mark. Please refer to the depth map provided at the end of these comments.

Under Background: Reference was made to two different agencies, in 2011 the U.S. Coast Guard and Army Corp of Engineers, sending letters of some 'findings'. Both of these agencies had been dealing with calls for years, alleging all sorts of activities concerning the set net operations until 2011 the complaints figured out 'navigation' issues caught the attention of these agencies. Neither agency has ever come out and done any depth readings, to determine the actual channel, or to determine the river width at mean high water and mean low water as a base for determination of the width of the river, nor stated in their letters how they determined the 'findings'. When questioned on any of these 'findings' we could not get any answers on how they determined them other than complaints.

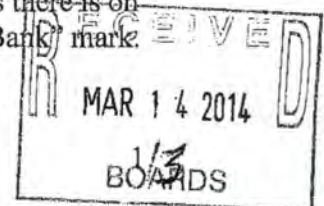
Under Cost Analysis: It will cost significant catch to each and every fishermen, approximately 5 of the 11 set net sites this coming year that plan to fish out to the 1000', if that last 400' of fishing area is taken away.

It will cost us further in the overall value of our entire operation and site value. This stat area, 321-50 has already suffered up to 60% decrease in historical catch over the last 10 years directly due to the management style of the current biologist. Reducing us to only 60% of our current fishing area could take away another 30-50% of our catch and possibly make these sites almost worthless.

The figures, 375-1 to 375-4, provided by the Department are overall very confusing and again filled with inconsistency and again shows a lack of accurate knowledge of the Ugashik River water depth. (His test crew could have easily provided this information to the Department as they have the equipment on their test boat)

**Figure 375-1** is not done to scale and is so misleading with his line drawing as to result in the entire drawing being misrepresented.

- The "East Bank" IS the 18ft high tide line (not two different lines as shown). Regulation is recognized as point from which to measure so why show both?
- This drawing was, according the Department to show the configuration pre-2012. The showing of a running and then a 'set gillnet' is totally incorrect. This never happened and leads you to believe that there was some odd fishing gear configuration, which there never was.
- Finally due to the lack of scale, which there is no excuse for, it looks like there is the same distance from the 1000' mark to the west shore as there is on the East bank from the 18ft high tide line to some phantom "East Bank" mark.



The comments of 1200-1500' make no sense at all as they are not in reference to a tide or scale.

If you look at the comments on the picture:

- This river is a tidal river so the 'flow' is in both direction, with a depth change over the course of 6 hour period as much as 12 foot on an 'average tide', and 20 foot on the more extreme tides.
- \* IF this picture is to be used as a general reference it is STILL incorrect. At no time were there side by side sites using running lines AND gill nets set out of them. This never happened pre-2012 and AGAIN never happened after the regulation change.

Figure 375-2 is again not done to scale, or even close.

- Again this drawing is marking the "East Bank" and the 18ft high tide mark as two separate lines. Confusing if not misleading.
- This is not a configuration that was ever fished, either pre-2012, or after. Why is this presented except to confuse the Board, unless the Department actually thinks they somehow saw this, then why not present one of the many pictures they took as evidence, but would not turn over, versus a drawing?

Figure 375-3, still again not to scale-

- Again the East bank and 18ft high tide line are marked as two different items when in fact totally incorrect.
- There is a comment of 'flow', which again is incorrect. This river is a tidal river and the 'flow' goes both directions, changing approximately every 6 hours. I am confused as to why the Department would make this note as we fish when the current is going both directions, depending on the openings.
- This configuration was never fished, by me or any other permit holder, period.

Figure 375-4, not to scale.

- For the final time the Department has shown the 18ft high tide mark and the "East bank" as two different points, which they are not according to the regulations.
- The 600' 'maximum' distance proposed is shown to be almost half of the river, which it is not. At the mean 18' high tide, as shown on the map at the end, the river is close to 2000' wide.
- The line denoted as 1200'-1500' is not correct, again see the map at the bottom where Google maps shows, to scale, the river to be near 2000' wide at a mean 18ft high tide.

Finally, the allocative aspects of this proposal will seriously and negatively affect us. This proposal will take away up to 40% of the fishing opportunity and is very allocative.

Respectfully,  
Victoria Briggs, Ugashik Village, AK 99613

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.

