




THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

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To: Glenn Haight, Executive Director
Alaska Board of Fisheries
Alaska Department of Fish & Game

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 From: Bruce Twomley, Chairman
Benjamin Brown, Commissioner
Commercial Fisheries Entry Commission

Subject: Proposals 126, 133, and 146 for the
2015/2016 A-Y-K finfish meeting

This memorandum provides comments on two proposals the Alaska Board of Fisheries (Board) will consider at the January 2016 meeting for Artic/Yukon/Kuskokwim Finfish in Fairbanks.

In addition to these comments, CFEC has submitted a report that we anticipate will help the Board. Titled *CFEC Permit Holdings and Estimates of Gross Earnings in the Arctic-Yukon-Kuskokwim Commercial Salmon Fisheries, 1976 - 2014* (CFEC Report No. 15-06N), the report provides summary information on entry permit holdings, fishery participation, and ex-vessel earnings in each of the A-Y-K salmon fisheries.

Proposal 126

Proposal 126 seeks to allow addition of purse seine gear as an authorized gear type to the Lower Yukon salmon gillnet fishery during times determined to be necessary for the conservation of king salmon. While we acknowledge that two alternative gear types – dip net and beach seine – have already been authorized for this fishery during times of king salmon conservation [5AAC 05.362(k)], we do not support Proposal 126. On the Columbia River, an on-going pilot project to use purse seine gear with a goal of conserving king salmon has generated mixed reviews for achieving this goal. Our greatest concern and primary basis for our lack of support, however, derives from the increase in fishing efficiency of purse seining over and above dip netting, gillnetting, or beach seining. As you know, Alaska's limited entry program is a license-type program that, in the salmon fisheries, controls only the number of participants. These types of programs work best with "input controls" on effort, and the economic and resource conservation intentions of licensed-based programs can be undermined when participants can easily increase their fishing efficiency by using alternative gear types.

Proposal 133

Proposal 133 seeks to allow addition of beach seine as an authorized gear type to the Norton Sound salmon gillnet fishery during times determined to be necessary for the conservation of king salmon. While the use of beach seines has not yet been shown to conserve king salmon in the Yukon River fisheries, if used in a manner to take special care of incidentally caught chinook, beach seine gear may prove to be better suited to conservation purposes than gillnets.

Proposal 146

Proposal 146 seeks to allow a directed commercial fishery for cisco in Norton Sound. An annual permit for Freshwater Fish set gillnet statewide (F04B) is currently established, and could be used for such a fishery if allowed. Since 2010, small amounts of cisco and other freshwater species have been taken on F04B permits.

Summary

Proposals 126 and 133 seek the use of alternative gear types in the respective fisheries. CFEC cautiously supports Proposal 133, but does not support Proposal 126 because of the associated increase in fishing efficiency. CFEC currently has an annual permit (F04B) which can be used for commercial catch of cisco in areas of Norton Sound if allowed under Proposal 146.