

RC 043

**FAX: 907-465-6094**

**TO: State of Alaska Board of Fisheries**  
**as comment/record copy on Proposal #203**  
**Emergency Order Authority**  
**Board Meeting Scheduled for March 8-11, 2016**  
**Statewide Finfish & Supplemental Issues**  
**2 pages**

**From: Marguerita McManus**  
**Sport & Commercial Fisherman**  
**PO Box 925**  
**Seward, Alaska 99664**  
**mm3458@gmail.com**

**I oppose #203 for the following reasons.**

**There is a world of difference between management of a resource to protect its continued survival—~~escapement~~—and management of a resource for financial interests of a single group—~~cost recovery~~—and these two concepts need to be kept as separate as possible.**

**Proposal #203 tries to blend them by forcing the Department to issue emergency closure orders for the sole purpose of cost recovery in a Special Harvest Area that contains wild runs—as it does in Resurrection Bay. The Resurrection Bay Special Harvest Area is not managed for escapement or broodstock. It exists solely for cost recovery for Cook Inlet Aquaculture. Excluding sport fishing on natural runs that exist in this huge area is an unfair allocation of public resources. Requiring that ADF&G manage this area for the sole benefit of Cook Inlet Aquaculture puts the Department in the improper position of becoming a financial manager for the aquaculture association.**

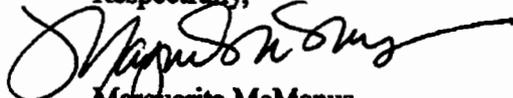
**Alaskan citizens, the group entitled to the state's natural resources, are not given a voice in the continued expansion of aquaculture associations. The public trusts that the aquaculture associations are working to enhance and restore salmon runs for all Alaskans, however that is increasingly not the case. Some aquaculture associations are now trying to act like for-profit businesses. Their focus on growing their assets and financial returns to the exclusion of all other fishermen should not be allowed. Their expanded operations are not benefitting the public—sport or commercial fishermen. They increasingly only benefit the aquaculture association and a small handful of commercial fishermen who are hired to do cost recovery harvesting. Exclusion of sport or commercial fishing from SHA's creates an effect fish farm, which is unconstitutional in the State of Alaska.**

**The emergency order powers of the Department of Fisheries are an extreme level of control designated to just a few individuals who have fewer and fewer monitoring resources as budget cuts continually hamper their quest to monitor and manage vast areas. The Department must balance the demands of overreaching aquaculture association financial goals with the needs of all Alaskans, while keeping in mind that the resources of this state belong to the public, not**

aquaculture associations. To ask that the staff do this by relying on the demands (based on financial management or mis-management) of aquaculture associations is asking too much. No lack of financial solvency by an aquaculture association should ever dictate the elimination of sportfishermen from a public resource, yet this is the exact goal of this proposal.

There are definitely areas where Special Harvest Areas include natural runs of wild stocks. Yet overreaching aquaculture associations now seek to eliminate sportfishermen from access to the public resource of salmon that belongs to all Alaskans with this proposal and it should never be allowed to happen. The continually increasing financial goals of aquaculture associations, and their inability to meet them, should never preclude public access to wild salmon runs. It is not the responsibility of the Department of Fish & Game to manage resources to the financial benefit of an aquaculture association and the exclusion of all others.

Respectfully,



Marguerita McManus  
Sport and Commercial Fisherman  
Lower Cook Inlet  
Seward, Alaska

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