

Submitted by Lloyd Gossman - Personal use – 45 year resident of Ketchikan Alaska

To The Alaska Board of fisheries.

Fax Number: 907-465-6094

I am opposed to Proposal 235 because:

1. Using the Sea Otter predation on the Dungeness Crab resource is the same old tired and stupid reason to expand the Dungeness Crab fishery that has been used before. If fisherman have to share the dwindling resource with additional predators they need to either eliminate the predators or quit fishing as much! For sure you shouldn't expand fishing into other areas like District 1 around Ketchikan. The last time they had a 3 year summer season for Dungeness in District 1 they nearly wiped the Dungeness out. They haven't recovered yet and to start another fishery in District 1 without a survey is irresponsible.
2. Harvest levels, without a Summer fishery for Dungeness in Districts 1 and 2, remain Strong. In 2014/2015 The Harvest of Dungeness exceeded 5 million pounds! This is near record levels! There is no reason to start a wasteful summer fishery in Districts 1 or 2. There is already a fall/winter season in place. Why expose more Dungeness to harvesting in the Summer when they are molting and reproducing. (Softshell) Leave this fishery alone!!
3. The Department opposes this proposal. They know the incidence of soft-shell Dungeness during the summer in District 1 is nearly 60 percent! We need to learn from our mistakes. The Crab buyers/processors in Ketchikan in 1974 refused to buy Dungeness Crab in district 1 during the summer because of poor quality. This Crab fishery was closed for years until the BOF pulled a fast one on the folks from Ketchikan. The Kasaan folks had to take the state to court to protect their customary and traditional rights and they won. Their area in District 2 was exempted from the last 3 year opening. To reopen this again is ridiculous.
4. Alaska Dungeness fisherman and the Alaska Department of Fisheries continue to say they fish Dungeness according to a season. In Washington, Oregon, and anywhere else there are Dungeness, a season is defined by specific findings like Shell condition (hard or soft), The weight of the crab, Overall crab quality, and numbers found. Only in Alaska is a season defined by dates!!!! Only in Alaska do we fish Dungeness without regard to quality, shell, condition and other findings that should be required. Also, many of our Dungeness crab fisherman just prior to selling, perform one last cleanup (usually out of sight or at night) of the catch to minimize the number of soft shell they bring to the dock for anyone to see! Millions of lbs of Dungeness have been wasted because of this practice. They continue this anytime they can when no one can watch or observe them.

5. Everyone has been OK with a Winter Dungeness Crab fishery in District 1. Opening an unnecessary Summer Dungeness Crab fishery now, is not only is wasteful, but without question allows the BOF to manage a fishery to accommodate **Non-resident** commercial fisherman. Never before that I know of has this been done and would set a terrible precedent. It may even be contradictory to the constitutional authority of the BOF. I don't know how Board members, who recognize **Non-resident** dual permit holders (Salmon/Dungeness), can prove that they didn't open this because these **Non-resident** dual permit holders needed accommodating in the summer due to weak Salmon Fisheries.

6. **John Jensen should not be allowed to vote or comment on Proposal 235.** His position as Chair of the BOF and being a Dungeness Crab Fisherman puts him in an undeniable position of having a **Conflict of interest**. His position of influence could affect the viability of the SE Alaska Dungeness Crab Fishery for all Alaskans. Any Board member who talks to John about proposal 235 at any time should also not be allowed to vote on this. Board oversight will be contacted about this issue.

7. Continual Fishing of Dungeness crab in the summer, is contrary to Department findings and recommendations, and will keep this from ever being a sustained yield fishery. Many people are just finding out about these certifications and are beginning to work diligently against any fishery that is not certified to have a sustained yield. The Alaska Marketing Institute and other entities may withdraw any support from this fishery. You cannot keep on harvesting Dungeness crab in Southeast Alaska with so much waste.

Again, proposal 235 has been brought in through the back door and kept as secluded from the public as possible. If his proposal was brought up in Ketchikan (Where this meeting was supposed to be held) anyone associated with it would be thrown out of town.

Do not vote for Proposal number 235.

Lloyd Gossman – Personal use - 45 year resident of Alaska
PO Box 9238
Ketchikan, Alaska 99901