

Donna H Rhodes
91 Seaview st.
Chathan, MA 02633
set net permit number SO4K 61832H
October 2, 2017

Chairman John Jensen
Alaska Board of Fisheries
Board Support Section

re: UCIDA Change request

I am strongly opposed to any changes in regulations that involve genetic testing. This proposed regulation of fish stocks is based largely on greed and who has the financial resources needed to carry out legal action. The Pebble Mine after long years of opposition has now succeeded in being approved to go forward. This is sad. Money and persistence won and Alaskan fishermen and the world could lose with one big earthquake. This proposed change of regulation includes non-local salmon stocks. If approved this will create an unmanageable situation and would put many fishermen out of business. It sets a terrible precedent for other fisheries to grab fish. Salmon are common property until caught. Escapement is difficult to control. What happens at the stream terminus and inner bays is perhaps the most valuable tool available to fish managers. Close these areas if under expected numbers are getting up the rivers. Open up these waters to fishing to limit unwanted escapement. Conditions that shift the seine fleet to other fishing grounds is bad for set net fishermen. Salmon are constantly moved and by storms. This would appear to make closures based on a set number of fish an invalid way to manage run strength. Closures to allow more fish to travel to Cook Inlet will interfere with the management of other sockeye and other salmon species. It would also shift seiners to other fish grounds. Salmon management would become much more difficult in almost every way. Over escapement or under escapement are both bad for all fishermen. I do not always agree with the Kodak fish and game management of salmon. I accept it as the best tool available to insure future salmon stocks of all fishermen.

I have been fishing since 1992. I am part owner of a set net site in Kodak Bay. One permit is fished. In 2017 we harvested and sold 8,072 pounds of chum salmon, 2,525 pounds of coho salmon, 208 pounds of king, 71,347 pounds of pink salmon and 6,962 pounds of sockeye salmon. Total fish caught was 89,114 pounds of salmon. The gross earnings from fish sales was \$ 38,857.15. I had a three person crew to include myself. We fished this season with only 3 short closures. Fishing in June is always slow.

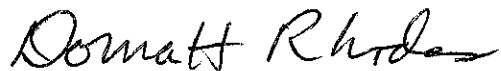
June	Reds 772 pounds	chum 546 pounds	pinks 458 pounds	
6/26-7/1	reds 554 pounds	chum 352 pounds	pinks 352 pounds	
7/2-7/8	reds 534 pounds	chum 352 pounds	pink 375 pounds	
7/11-7/15	reds 959 pounds	chum 1606 pounds	pinks 4613 pounds	king 12 #
7/16-7/22	reds 649 pounds	chum 282 pounds	pink 5,288 pounds	coho 14#
7/23-7/29	reds 1,1210 pounds	chum 1,937 pounds	pink 13,8232 coho	coho 94#

The total fish sales for June were only \$1,452.62

Winds always make a difference in the amount of fish we catch. Anything with a west component and 15 to 30 knots increase catches if there are any fish around. In 2014 gross income was \$24,484.39 with

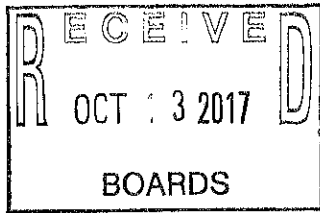
expenses of \$29,202.85. A loss of \$4,718.46. In 2015 income was \$37,312.87 . With a profit of \$7,749.71. Expenses were \$29,563.16. a profit of \$7,749.71. In 2016 income was \$26,710.50 with expenses of \$36,602.91, A loss of \$9,892.38 Earlier years we made profits. Now I do not seem able to string 2 years of profit together, In quite sure I do not need for new regulations to reduce to create conditions that will reduce my income.

Management of fish stocks need to be controlled locally. Kodiak has been regulated regarding Cook Inlet salmon. Regulations or legislation will be an impossible thing to reverse. There is not enough data to tell exactly how weather, run strength or weakness determine how many fish get past Kodiak waters. Fish arrive in bursts. Please do what you can to avoid this change.



Donna H Rhodes

(Mail on or before October 3, 2017 or e-mail to
dfg.bof.comments@alaska.gov)



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 Address Chatham, MA
 Date 3 Oct 2017

Chairman John Jensen
 Alaska Board of Fisheries
 Boards Support Section
 P.O. Box 115526
 Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request and
 Genetic Stock Composition of Sockeye Salmon in
 the Kodiak Management Area

1st Paragraph: Clearly state that you oppose the UCIDA agenda change request because it does not meet the Board's agenda change request criteria because the Kodiak Management Area genetic stock composition study does not present any "new information" that "corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted" nor does Cook Inlet sockeye caught in the Kodiak create a conservation concern or have conservation purpose or reason. Moreover, there is no error in regulation that needs correcting.

2nd Paragraph: Outline your engagement as a stakeholder. For example, fishing history, use of the resource or fisheries related job or business. You should detail how long you've been a stakeholder and the importance of the Kodiak salmon fishery to you during the June 23 - July 31st time frame.

3rd Paragraph: Outline why the agenda change request does not make any sense. (choose one or more from below)

- a. Not tied to any assessment of the annual percentage Cook Inlet sockeye in the three management areas targeted.
- b. Does not address the natural variability (big or small) of either Kodiak sockeye runs (Like Karluk in 2017) or Cook Inlet.
- c. Does not account for geographical variability in the availability of Cook Inlet sockeye in the Kodiak area. If Cook Inlet fish are present, they can be encountered both in and out of the designated 3 areas.
- d. Does not consider the drastic fishing impacts on the fishing of local stocks.
 - Forgone harvest of local sockeye will cause over-escapement

- Sockeye fishery closures will move the fleet to other areas
 - Fleet movement and proposed closures will redistribute local catches between the seine fleet and the gillnet fleet
 - Local Pink and Chum salmon harvests will result in forgone catches and poor quality as catches are moved to inner bay areas
 - Terrible precedent to completely disrupt one area's fishery to slightly advantage another area's harvest. Salmon are considered "common property" and do not "belong to" the management area where they were born. '
 - If Kodiak is regulated for the presence of Cook Inlet sockeye. Will the board also more to regulate Chignik and Area M for the take of Kodiak sockeye and pinks?
 - Your personal observations regarding impacts from the proposed Agenda Change Request
- e. Proposal does not assess the economic costs to Kodiak salmon fishermen, processors, processing workers, Kodiak Businesses and the Kodiak community. How will it impact you financially? See 2016 economic impacts assessment.

4th Paragraph: State why the Kodiak Management Area management plans are focused on the availability and harvest of local stocks (salmon that originated and returned to Kodiak steams). And/or state that the Kodiak fishery is an historical fishery that is not fishing in new areas, or seeing increased targeting of Cook Inlet fish. Why do you think the Kodiak Management Plans are working?

5th paragraph: Restate that the UCIDA agenda change request does not meet the Board of Fisheries Agenda Change Request criteria. The Kodiak Management Area genetic stock composition study does not present any "new information" that "corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted" nor does Cook Inlet sockeye caught in the Kodiak create a conservation concern or have conservation purpose or reason. Moreover, there is no error in regulation that needs correcting.

Sincerely yours,

Wonna H. Rhodes

Name of you and your family