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January 23, 2020

Mr. Reed Morisky, Chair
ATTN: Alaska Board of Fisheries Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811

Dear Chair Morisky and Board Members:

Lake Clark National Park and Preserve appreciates the opportunity to comment on proposals for the 2020 Upper Cook Inlet Finfish meeting of the Board of Fisheries. Below are our comments on proposal 210 that has the potential to affect National Park Service operations along the coast of Lake Clark National Park (Park) on the west side of Cook Inlet. While the Park is not taking a position on the proposal, we did want to highlight safety concerns we have with the current fishing practices and how proposal 210 may affect these safety concerns.

Proposal 210:
This proposal amends 5 AAC 21.350 to close waters to drift gillnet fishing within one mile of the mean high tide line on a portion of the west side of Cook Inlet. The closure is intended to create a buffer between commercial fishing and competing user groups in the area.

Over the last decade, Park staff have observed practices of a number of vessels in the west-side fishing fleet pose that raise significant public safety concerns. Specifically, it is common practice among these vessels to bring their bow onto the beach at high tide, then deploy nets while backing off the beach. As a result, part of the net winds up going dry, thus becoming fixed on the beach. As a result of this fishing practice, nets full of fish wind up on the beach in an area with a high density of brown bears. This practice inevitably draws bears to the nets to eat the fish.

The Park has observed this occurring near two areas of high bear density and high visitor use: Silver Salmon Creek and Johnson River. Silver Salmon Creek in particular is a heavily-used bear viewing area during the commercial fishing season. Between June and September 2019, the National Park Service recorded a minimum of 1,600 visitors to the area, and the total is likely higher. This is part of a pattern of increasing visitor use of the area stretching back over the last fifteen years.

The Park has at least one if not two rangers at Silver Salmon Creek during the peak fishing weeks of the summer. However, the area of the beach where this is occurring is below mean high tide and therefore out of our jurisdiction. We work hard to educate visitors about safe bear viewing practices to ensure the safety of the visitors and bears.

However, when the bears are picking fish out of the commercial nets we have observed fishermen shooting at bears from their boats. This poses a serious public safety issue, as the backdrop they are shooting into is occupied by people who are not reliably visible. The scope and extent of human activity is not readily apparent from a boat because vegetation on the beach ridge obscures people, vehicles, and buildings.

Park law enforcement staff have contacted the Alaska State Troopers, who have jurisdiction over commercial fishing. This has resulted in at least one citation for unlawful take of wildlife. Unfortunately, this has not corrected the behavior. The west side fishery is small and the Troopers are stretched thin. It is unrealistic to expect the Troopers to devote an outsized portion of their limited resources to a relatively small portion of the Cook Inlet fishery.

While the Park is not taking a position on Proposal 210, we wanted to highlight the safety concerns the Proposal seeks to address. They are real concerns that have increased in the past several years.

Thank you in advance for your consideration of our concerns.

Sincerely,

Susanne Fleek-Green
Superintendent