

**From:** [Phyllis Shirron](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 19  
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Proposition 19- burden of conservation, simply instills a safety net for the salmon at times of low abundance.

Salmon are deemed common property in Alaska. Upper River and Lower river biologists manage our common property, but share NO common goals in doing so. Rightfully, their divisions, budgets, and priorities are separate. But the life cycle of said common property spans both management areas, therefore conservation should be equalized.

Historically, there was a rule protecting the stock throughout Copper River drainage. That was removed during the most recent Board cycle of 2017, on the premise that it had not been utilized up to that point, so why keep it?

2018 saw a drastic decline in return stock. Therefore commercial fleet was immobilized to insure passage. There was no protocol in place to protect the fish as they approached the spawning grounds, so up-river saw **no reduction of time, area or gear. Once again, Gulkana did not get their brood stock.**

In the previous example of 2018, sockeye escapement was met but the fish did not arrive at the spawning grounds, nor did they complete the life cycle. The commercial fishermen did not receive their allocation, which had incredible financial consequences. I am not saying that because we are greedy. The drift fleet pumps huge amounts of money into state and local economies through a fish tax. Each fisherman is taxed on the total amount of pounds at each delivery. This money supports infrastructure, public services, hatcheries and more. We saw negative impacts to the economy.

I would like to be clear that Proposal 19 is not attempting to limit access or amounts of any user group. It is a tool to be utilized in times of low abundance. If the commercial opportunity is drastically reduced, the dip net fishery is limited to 50,000 fish which is their lower limit. They are not asked to stand down, simply to reduce the harvest for a short amount of time. The proposal states commercial harvest is less than 50% of the 10 year average by June 1, the dip net fishery is reduced to 50,000  
(Please see proposal for more details)

We are seeing, in real time, a shift in the CR salmon. *Reinstating* this regulation will help preserve the integrity of these anadromous species while creating parity amongst all user groups. I strongly support Proposition 19.

Thank you for your time and efforts.  
Phyllis Shirron