

## Central Peninsula AC

Submitted by: David Martin

### Request for reconsideration on Proposal 136

We are requesting the reconsideration on the Boards action that approved proposal 136 that arbitrarily increased the waters closed to commercial fishing for salmon from the standard 500 yards to 1 mile from the mouth of Silver Salmon Creek and Shelter Creek on the west side of the Cook inlet. We request the Board to rescind that action and vote NOT to approve Proposal 136 based on this new information:

1. There is no compelling evidence, scientific data, enforcement issues or conservation concerns to expand the closed area beyond the current regulation of 500 yards that has been in affect for many decades.
2. The one-mile closure would eliminate most of the fishing area that is fishable because it has few rocks and snags. The fishery is done close to the shore and has shallow water, specifically at low tide. Most of the remaining area is unfishable because it is full of rocks and snags and with the tidal current tears up the net. Commercial fishing in these rocky areas would basically not be feasible.
3. This area is 35 miles from the processors dock in Ninilchik and 45 miles from the Homer dock where most of the salmon are unloaded. It is a six-to-seven-hour long trip one way. In order to deliver enough volume to make it worthwhile for the fishermen and for the processors to keep buying in this mid-August to early September fishery. The openings have been developed by the fishermen and the department to coordinate the openings between Area 3 and Chinitna Bay to incorporate a two-day fishing trip. Area 3 is open Mondays and Thursdays 7:00 AM to 7:00 PM and Chinitna Bay is open Tuesdays and Fridays 7:00 AM to 7:00 PM. We fished the Silver Salmon Creek and Shetler Creek area then move down to Chinitna Bay to fish the second day. The fishermen carry extra ice to properly ice the salmon for the two days. We head over Sunday, fish Monday and Tuesday, head back to Ninilchik or Homer to unload Wednesday and turn right around to head back over to fish Thursday

and Friday then head back to deliver Saturday. This is all weather permitting and we always will not be able to fish some of these openings because of bad weather. Also, there is usually only between 2 to 12 local fishermen who participate and half of them are from the Russian villages, and they will miss several of the openings because of their religious holidays that forbids working or fishing. This is a low participation, low volume scratch fishery but is important to those of us local fishermen that participate. This is also the time for keeping home pack and supplying the locals and Senior Center with salmon through either giving it to them or by direct market sales.

4. Without having our traditional fishing areas at Silver Salmon Creek and Shelter Creek we would not be able to justify the time and expenses for basically only one 12-hour day of a fishing trip.
5. There is not a salmon sports fishery in the salt water in these areas.
6. Most salmon stocks in Alaska are not monitored but they maintain sustainable harvest and escapement as these two systems do and the decades of fishing only two 12-hour commercial fishing periods per week have proven to be conservative.
7. Bear viewing lodges north Silver Salmon Creek also have, at times, an educational, or some other named net, that would be in the one-mile closed area.
8. The Board just approved to maintain the current coho sports fishing bag limit in the Kenai River which is also not monitored for coho and is sustainable.
9. Also, at this time of year, no other place is open to commercial fishing, that has late salmon runs, because of regulation closures.
10. The creeks are not being blocked off. I've never seen anyone doing so and, we would confront and report anyone who would, these are longtime local commercial fishermen who are ethical, law-abiding fishermen, who are stewards of the resource and would not jeopardize the sustainability of the salmon runs and their future fishing livelihoods. Enforcement periodically flies over, plus lots of plane traffic flying in and out bear viewers.