

From: [Phyllis Shirron](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: PWS meeting Proposal 7
Date: Thursday, December 2, 2021 10:59:59 AM

Phyllis Shirron
 Subsistence and commercial fisherman
 Cordova

Regarding proposal 7: guided subsistence on upper copper river

This proposal wishes to do away with the commercialization of subsistence and Personal Use fishing by eliminating guided trips. It does not wish to limit subsistence/PU fishers, subsistence/PU methods, or harvest limits.

The public outcry in support of this proposal reflects the vast concerns regarding the health of our salmon runs. ADFG biologists reported a large increase permits issued, and number of fish harvested over the last 3 years. The original dipnet charter started nine years ago. There are now 5 outfits on the river; 4 of those began over the last 3 years.

We are concerned about the number of fish that do not make it to the spawning grounds or the Gulkana enhancement center. There is lack of real time data for biomass on the upper river, and an absence of data for the numerous tributaries. New accessibility to these fish through guided charters is an unknown factor that may have far reaching, negative impacts. Guide services are not evil or bad entities. But they are relatively unregulated, relatively unknown, certainly outside the spirit and definition of subsistence by our Alaska standards, and operating in a grey area of the law.

When there was only one service, there were few concerns. I would like to clarify the numbers involved with these services, now that there are at least 5 outfits.

Let's assume each has only 1 boat. 5 boats, 6 clients, two times per day, permit holders do not get there limit and stop at 20 fish:
 =1200 fish per day.

In truth, there are numerous boats per outfit, often 3 trips per day carrying 4-6 clients, and drift until they get the upper allotted limit. That is much more than 1200 fish per day, which is likely unsustainable.

These permit holding clients would not typically fish this river. (You can find that information for yourselves, but there is no time for me to include my previous research). Therefore, the accessibility has increased usage AT A TIME THAT THE HEALTH OF THE STOCKS IS QUESTIONABLE. If the stocks were healthy there would be less public concern and outcry.

Transport and guide services operate with different parameters. Transporters drop off and retrieve their client at a scheduled time. Guide services are all inclusive, which is self explanatory. Proposal 7 does not wish to restrain transport services, only guide services. Therefore, if the Board passes this proposal, the guides could remain in business as a transport service.

Typically and traditionally, subsistence fishers in boats, will gather with food and gear

(neighbors or families or friends). We share the vessel and cost of fuel. We combine efforts to process and preserve the harvest. We do our best to take only what we need. For the record, the charter services in Chitna river tout their ability to get your full harvestable limit. It is on their website. They also request the client not apply for a permit until the day before the trip. This allows them to suggest subsistence or PU permit according to optimal harvest potential for the trip. That is on the websites. This action is unusual and unnecessary. Any other fisher applies for the permit appropriate for their self or family.

I would like to reiterate that our salmon stocks are questionable, which is why our concerns have flared over the years. Pressures on CR stocks are not only human. Pressures on salmon while in salt water have increased exponentially, and the pressures are widely unknown. Subsistence/PU fisheries is geared toward supplementing our lives, and sustaining rural communities. Available to all residents, this is a special opportunity unique to Alaska, that non indigenous people get to partake in. I would like to see the practice continue through the future. To achieve that, we MUST prioritize the fish through personal restraint, and conservative actions by the Board and Department as pressures increase on salmon.

Please support Prop 7

Thank you,
Phyllis Shirron

The following link takes you to a google page that lists dip net charters. If the link doesn't work simply google 'dip net charters'

<https://www.google.com/search?q=dipnet+charter&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari>