

PROPOSAL 93 REGARDING BUCKSTOCK RIVER

Below is a synopsis of the relevant information that should be considered when entertaining any closure of the Buckstock river as proposed in proposal as submitted by the CENTRAL KUSKOKWIN FISH AND GAME ADVISORY COMMITTEE.

- While the legitimacy of the scientific evidence offered in the proposal is beyond doubt, the way it is presented is not a realistic reflection of the situation on the ground. I also recognize that all critical data is not always available, and one may have to rely on subjective observation and experience in certain situations. However, such evidence needs to be scrutinized and treated with critical thinking to avoid random, biased decision making that could lead to discriminatory actions. With that in mind I submit the following.
- 1. The chosen red line critical flow (400 cfs) is random and without any scientific validation, motivation or study.
2. The evidence of stream flow data has been cherry picked to support the proposal. The available data shows that this is not a typical year. If stream flow information is to be used it should be averaged out using the available data. Using the data offered (2020) it shows the flows to be below the 400 cfs redline by October 15 when Coho are at the height of their spawn. In the data from the year prior (2019) it shows that flows were well below the red line until 19 September. In the data set from the subsequent year (2021) the data shows that flows stayed below the red line until 16 September and then dipped below the 400cfs again by 25 September 9 days later. It is my contention that the red line value and the date of 1 September were not randomly chosen. The reason for this opening date is that this proposal wants in no way to be seen as interfering with the opening of the local moose hunting season in zone 19A on September 1 every year. Any restrictions, however remote in this regard would be met with outrage at the local level.
The chosen starting date of June 14 is equally random. The offered data set is misleading at best, deceptive at worst. If one looks at historical averages the flows at this time are way higher than the red line that has been chosen. Once again the cherry picked data tries to indicate low flows which is historically inaccurate. The proposal is touted to protect spawning Salmon and redds however, this action only occurs about 3 to 4 weeks after the selected start date. In fact the Chums are not even in the river yet. One might consider this start date as random but it is not. For the last 30 years we have started fishing in the second half of June if the flows are low enough(this year June 16) so the date chosen is clearly aimed at keeping us off the river even though there are no fish there.
3. If the motivation of this proposal is an environmental one that seeks to ensure the well being of our Salmon, how is the date of 1 September even remotely relevant to conservation goals. After 1 September the Coho begin to go into their spawning period in some of the traditionally low flow periods (data not available but based on subjective observation over 30 years). Surely this is likely one of the the most vulnerable times of the year for Salmon and redds. In our observation the Coho are every bit as threatened as the Chums but this proposal does not see that. It may be worth noting that we do not fish clients on the Buckstock after the first week of September. The proposal however sees fit to open the Buckstock again at this point.
4. While the numbers of Chum salmon at the Salmon river weir and not in dispute there is no known correlation between the returning fish numbers and the numbers on the Buckstock river.

The Buckstock Chum numbers are only verifiable by actual counts on the river or scientifically extrapolated data, which would also depend on study. No such evidence is offered.

5. While currently we do not have the exact number of miles of waterfront in this drainage (although it can be determined with satellite imagery we are in possession of) we estimate it be well in excess of 200 miles including rivers , creeks, braids, sloughs, spring feeds etc, including the upper reaches of the Salmon river , Bell creek, the upper reaches of the Kipchuck river and the upper reaches of the Aniak river up to the Aniak lake. (The last 4 sections of water mentioned are not accessible to us and are generally only fished by float trips.) The accessible section of the Buckstock that is proposed to be closed is likely to be less than 4 miles. Although not based on scientific imperial data, the question is ; how is, it that a piece of water, that is less than a minute percentage of the overall water, is chosen to be singled out for this radical sort of legislation. It is my contention that this is a biased proposal that singles out sport fishermen and our operation specifically. They simply don't want us there. We can identify numerous areas that are way more vulnerable in this drainage that are not mentioned in this proposal.

5. Proposal 93 also wants to shut down subsistence fishing on the Buckstock river above the proposed marker. In the last 30 years, other than the years when Rainbow trout were targeted on the Buckstock (now only catch and release so obviously no subsistence) we have not seen a single person fishing subsistence. Not one . I submit that this effort to shut down subsistence as well is simply a smoke screen to make the proposal look as if it not directed only at sport fishermen. It is a veiled effort to make the proposal look unbiased. This proposal is trite and will only lead to superfluous legislation, something we can all do without.

This proposal has been designed to infringe on the rights of all sportfishermen and more specifically to drive us off the river. This is the sharp edge of the wedge that is being driven in to create a foothold for further action to stop all sportfishermen on the Aniak river. It is a remnant of the " don't play with your food" movement which has systematically rejected the concept of sport fishing and more specifically the practice of catch and release. It is worth mentioning that over the years we have made some wonderful friends and developed many great relationships in this small community that we are a part of. We have been given a lot of support and in turn we have done our best to reciprocate wherever possible. Over the years we have seen a small group of individuals try their best to smear our reputation and spread malicious lies to further their agenda and the time has come to put an end to it.

If this proposal is passed it will have a significant negative impact on our business. There are a substantial number of clients that will not return to Aniak if they cant fish the Buckstock. We bring in over 200 clients a year that have a direct impact on the local economy. Our contribution to the state economy is over 2 million dollars a year.

This type of legislation is potentially the beginning of the end for small business like ours and offers no significant benefit to the fishery we hold dear and strive to preserve every opportunity we get.