



UNITED FISHERMEN OF ALASKA

Mailing Address: PO Box 20229, Juneau AK 99802-0229

Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801

Phone: (907)586-2820 **Fax:** (907) 463-2545

Email: ufa@ufa-fish.org **Website:** www.ufa-fish.org

March 17th, 2015

Office of Subsistence Management
U.S. Fish and Wildlife Service
1011 E. Tudor Rd, Mail Stop 121
Anchorage, AK 99503

RE: FSB action on Kenai, Kasilof and Makhnati Island subsistence fishing.

Dear members of the Federal Subsistence Board,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations and over 400 individual members participating in fisheries throughout the state and its offshore federal waters. It is highly likely that UFA members will be adversely affected by three recent actions taken by the Federal Subsistence Board.

UFA respectfully requests reconsideration of proposals FP15-10, FP15-11, and FP15-17 which were approved at the Federal Subsistence Board. Our comments on each action follow.

FP15-10 –new use of in-river gillnet by residents of Ninilchik in federal freshwaters of the Kenai River. Residents of Ninilchik have a priority over other users of salmon and trout in the Kenai river, and reasonable opportunity to meet the amount needed for subsistence under current federal subsistence as well as state sport and personal use regulations.

Kenai river king salmon are suffering a period of low abundance, and all users have taken significant cuts. We feel that additional pressure in upstream spawning areas with a new gillnet fishery will cause jeopardy to spawning of king salmon in the area, defeating the purpose of regulations that seek to restore king salmon in the Kenai.

All users including residents of Ninilchik are required to release rainbow trout and Dolly Varden over 18 inches in length. Allowing new use of an upriver gillnet is incompatible with the objective of releasing these large trout.

We do not feel that the community has had ample time to develop the fish wheel that was previously permitted for residents of Ninilchik in the Kenai River. It should be expected that it may take some trial and error before a location is found where a fish wheel will work adequately. The ability to safely release any non-target species such as large trout or king salmon is an important feature of the fish wheel. Fish wheels have been implemented successfully in other subsistence fisheries, and we encourage more due diligence in the fish wheel effort.

FP15-11 – new use of gillnet by residents of Ninilchik in federal freshwater of the Kasilof River. Residents of Ninilchik have a priority over other users of salmon and trout in

the Kasilof River, and reasonable opportunity to meet the amount needed for subsistence under current federal subsistence as well as state sport and personal use regulations. We do not feel that the community has had ample time to develop the fish wheel that was previously permitted for residents of Ninilchik in the Kenai River. It should be expected that it may take some trial and error before a location is found where a fish wheel will work adequately. The ability to safely release any non-target species such as large trout or king salmon is an important feature of the fish wheel. Fish wheels have been implemented successfully in other subsistence fisheries, and we encourage more due diligence in the fish wheel effort.

FP15-17 – UFA closure of Federal public waters to non-Federally qualified users in the Makhnati Island area to the harvest of herring and herring spawn. The Federal Subsistence Board Policy on Closures to Hunting, Trapping and Fishing on federal Public Lands and Waters in Alaska, adopted in 2007, states that:

“the Board will not restrict the taking of fish and wildlife by users on Federal public lands unless necessary for the conservation of healthy populations of fish and wildlife resources, or to continue subsistence uses of those populations, or for public safety or administrative reasons, or “pursuant to other public law.”

We do not believe that any of these criteria are met with the Makhnati Island area closure. The herring fishery is closely and conservatively managed by the Alaska Department of Fish and Game, and herring is the most researched species in Alaska. The Alaska Board of Fisheries closed a large area adjacent to Makhnati Island in 2012 to address concerns of local subsistence users. Although herring are well known to experience fluctuations, the biomass is healthy and supports an important commercial fishery that is constrained to 12 – 20 percent of total mature spawning biomass.

The Board’s closure of the area to all non-federally qualified users, including personal use and sport, is an unintended consequence beyond what was proposed in proposal FP15-17. ADF&G notes in its comment on jurisdiction that the Board’s authority would require this more far reaching closure rather than the proposed commercial-only closure, and is additionally outside the criteria for closure. The fact that the proposal as written was outside the Board’s authority is ample reason to reconsider this action.

Please consider this request and reconsider actions taken on these proposals.

Sincerely,



Julianne Curry
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Fishermen’s Marketing Association
Alaska Independent Tendermen’s Association • Alaska Longline Fishermen’s Association • Alaska Scallop Association
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve
Cape Barnabas Inc. • Concerned Area “M” Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen’s Association
Kodiak Regional Aquaculture Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association
Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman’s Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association