

From Katmai Fishing Adventures LLC <gofish@bristolbay.com>  
Sent Sunday, February 1, 2009 8:39 pm  
To salmonbycatcheis@noaa.gov  
Subject Written Comment Submission

C09

February 2, 2009

Dear Committee Members;

I have chosen to share my testimony electronically and sincerely appreciate your undivided attention and serious consideration of my views concerning the Chinook salmon by catch issue in the Bering Sea Pollock Fishery. I hope that you would include these with the rest of the testimony you receive.

I am Nanci Morris Lyon, owner and operator of Alaska Sportsman's Bear Trail Lodge LLC, a commercial sport fishing operation. I have been involved in this industry for 22 years, I am also vice chair of the Bristol Bay regional federal subsistence advisory council, board member of the Bristol Bay Chamber of Commerce, board member of Wells Fargo Bank King Salmon branch, board member of the Southwest Alaska Conservation Coalition, board member of Naknek Electric Association and most importantly King Salmon resident, subsistence user and concerned citizen. I write today to identify my concerns surrounding the huge increase in the Chinook salmon by catch issue.

I have read through your extensive and analytical EIS and absorbed as much of an 800 plus page document as I am able, not being the author nor a scholar. I find much of it to be very well thought out and realize what a difficult and arduous task you have to determine the best solution for a complicated problem. My comments result from my extensive experience in the Bristol Bay fishery and my brief review of your EIS.

I am concerned that your Alternatives are all fairly liberal with the upper capping number that will trigger some form of protection for the Chinook salmon. I feel that a much safer number would exist in the upper 40,000 to lower 50,000 ranges. I base that comment on the fact that a number of our river systems have escapement goals of less than 20,000 fish. I also acknowledge that my absolute preference would be to have a number in the range of less than 1,000 fish taken as by catch, since my home water on the Naknek River has an escapement goal of 5,000 fish. That being noted, I see a huge opportunity for the Pollock fishery to inadvertently wipe out an entire season of Chinook fishing for all user groups in an area.

I know that the numbers you propose were analyzed through past performance of the fishery, but you should not assume that just because those numbers happened in the past they might be acceptable in the future. We have struggled for the past three seasons to acquire the Chinook our communities have come to rely upon, when our pre-season forecasts were for adequate numbers of fish returning. I know that the Pollock fishery is not the only predator out there, but it is the one that has the numbers to prove our concerns and one that we may actually address and moderate. Please take another look at these numbers and think about the hardship that others might endure if they are not kept at a lower level.

I commend the fishery for offering to implement some of its own regulations and invest in methods to protect the Chinook resource, but I must say I cannot imagine an agency out there that would realistically be able to

execute a fishery if everyone is not on the same page. I think it would be dangerous and possibly unmanageable to have a portion willing to cooperate under one guideline and the remaining portion following a separate set of guidelines. I am sure it will cause dissention and unease among users. I would highly recommend that the alternative implemented would result in everyone playing from the same deck of cards.

As a user of this resource from its origin, I would prefer to see PPA #2 implemented with a lower cap limit for the reasons stated above. I also feel it is safer to implement a single cap with a lower limit so that as the fishery progresses, should the limit be reached quickly, the possibility of over extending the cap will not be as potentially harmful to the Chinook runs.

I do not wish to take up any more of your valuable time than is necessary, so in closing I thank you for your attention to my comments. I would urge you to contact me for any further information you might require or for questions you might have concerning my comments. I wish you luck in sorting out this complicated issue and would appreciate receiving any further information that is forthcoming, related to this issue.

Sincerely,

Nanci A. Morris Lyon

Alaska Sportsman's Bear Trail Lodge LLC

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