

C40



From roland@briggsway.com
Sent Monday, February 23, 2009 12:31 pm
To salmonbycatcheis@noaa.gov
Cc stan.lee16@yahoo.com
Subject Salmon Bycatch EIS

From- Roland Briggs, Fishermen with Bristol Bay permits

I am commenting as a fisherman who has over 30 years of fishing experience in the Bristol Bay area both in drift and set net on various rivers.

My comments are to the following - Alternative 4 - the 'preferred one'.

My overwhelming concern is on the methods use to set the 'cap' limits for the Chinook by-catch fishery.

IF I understand your methodology correctly the 'cap's are set on "historical by-catch numbers". Since 2002 these numbers have increased dramatically and to use ANY data from 2002 to the present is to reward the abuse of the limits allowed.

There seems to be no scientific data to support the use of by-catch data to sustain a fishery versus the use of projected returns.

Successful fisheries have shown that the use of a projected run and THEN setting an allowable intercept for a catch is more sound.

By using a by-catch data, especially one that is based on a fishery that is already showing signs of a catastrophic collapse, is to reward behavior that has already gone to far.

I can see, by setting up caps on historic data, where it will sound good but is a way for us to never reach these caps and thus seeing in very short order a total wipe out of the western AK Chinook runs.

Given that Chinook are typically on a 4+ year return cycle it appears we are already seeing the returns from 2004 and before when the by-catch amounts were starting to rise dramatically, from 2003-2007 over 250%.

Alternative 4 SOUNDS good but the devil is in the details and this method seems to be unsound science. As was so well said by Stalin- "it doesn't matter who votes but who is doing the counting".

This entire way of calculating the allowable by catch sounds much less noble than a fox watching the hen house and goes directly against any policy of a sustainable Western Alaska economy.

The ground fishery quota are already set on a percent of biomass with much success. The salmon fisheries are successfully set on the percent of the strength of the run.

To changed this proven methodology to one based on historic catches are to doom the Western Alaska Chinook fisheries and with it many fishermen and communities.

The Chinook by catch limits should be based on the strength of the projected Chinook return to Western Alaska.

I have seen a direct decrease in Chinook return to the Ugashik and Cinder River systems over the past 5 years. This early fisheries is vital to local fisherman who depend on early money as there are on processor imposed limits during the main Sockeye run. These early Chinook salmon are shipped out fresh so the fisherman see a high per lb. return on their effort.

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