

The State of Alaska

Senate Resource Committee

My name is Kenneth Tarbox and I am writing in opposition to Senate Bill 90. I am a fishery biologist who worked in Upper Cook Inlet for the State of Alaska as the Research Project Leader, Commercial Fisheries Division for 20 years. I also managed the UCI commercial fishery in 1991.

This bill rationale is that it will put more fish in the river and help the eastside set net fishery survive economically. This is a false premise. In addition there are logistical and technical problems with the bill. The specifics are listed below:

More fish in the river-the assumption is that reducing permits will reduce fishing power and thus more chinook and sockeye salmon will enter the river. This is a false conclusion. The Board of Fish has established allocation goals and biological goals for the management of the Upper Cook inlet Fisheries. Therefore ADFG Commercial Fisheries managers must fish to meet these goals. They do not change with this bill.

A manager has fishing power in the amount of gear used, and the time, and, area of the fishery. If one reduces fishing power by reducing the number of nets then a manager to meet goals must fish a larger area or more time. Therefore, if this bill passes fishing time for the drift fleet(larger area and more gear) and the remaining set net fishery will have to fish more time to make up for the lost fishing power of the set net fishery.

No more fish will go into the river as the goals dictate the number of fish in the river. Those are not changed by SB90.

In addition, if the drift fleet fishes more, less fish will be moving to the Northern District and less fish may be going into the Northern streams.

More economically viable and sustainable set net fishery- it is true that the remaining set nets may catch more fish with the increase in fishing time. However, there are no data presented that the eastside set net fishery is not sustainable or economically viable. While areas fishing near the Kenai River mouth have had reduced fishing time the majority of set nets targeting Kasilof River sockeye have seen increased fishing time due to Board of Fish regulations.

Less gear does not mean a proportional reduction in harvest - the bill states that this is a voluntary program for eastside set net permit holders. Most permits on the eastside are family operations. So, while only one individual can hold a permit the spouse, kids, and even crew members hold permits and fish as a unit. The bill offers 260,000 dollars per permit. A family site which has multiple permits may be willing to sell the least productive

permits for the 260,000 dollars and keep the most productive sites and permits. Therefore, a reduction in harvest probably will not be proportional to reduction in gear, even if fishing time is not increased. Cost of the permit in SB90 is then inflated well above the actual value of the permit.

Enforcement issues - the bill requires the ADFG to close the lease area for the permit if one exists. There is a valid question whether ADFG can do this or the Board of Fish needs to close open waters.

Some leases are fairly large blocks while others are for just the set net location. The problem is that the bill is not buying all the permits in one area. So it will be a checkerboard pattern. Enforcement will probably not have the time or manpower to check and see if a net is in a small closed area. A single net site has two points (shore and offshore ends). How does one close that small an area and be enforceable? The answer is that it is not possible.

In addition, the bill states that those without leases can survey their net site. However, two or more permits could fish the same site. Some fisherman stop fishing late July but the season extends to mid-August. Other permit holders are allowed to fish these open waters if the net site is vacant.

No adverse effect on the State Treasury – the loss of 200 permits certainly will impact the State treasury. License and tax revenue will be lost. The cost of administration over decades of fishing will be an additional cost to the State. Enforcement costs will certainly increase as officers on the grounds will have to spend more time evaluating whether waters are open or closed. The cost of producing maps of closed areas so fisherman and the public know what is open and what is not will increase management costs.

Distinct Administrative Area – presently a Cook Inlet permit can fish anywhere in the Inlet. The SB90 bill creates two Administrative Areas – Central District and Eastern Set Net Subdistricts. The bill states that an individual holding an entry permit for the Cook Inlet set net fishery shall be reassigned an entry permit for the Cook Inlet Central District set net fishery. There is no discussion of the Northern District or Lower Cook Inlet fishing area. Does this mean that all permits outside the Eastern Set Net Subdistrict are now classified as Central District and therefore fishing is limited to this area? Permits outside the subdistrict should remain Cook Inlet permits.

Eligible to sell – the bill states an individual must show proof of fishing in the new subdistrict for two years prior to December 31, 2018. The SB90 is buying back permits. So, if an individual purchased the permit and site during the preceding two years and fished the permit and the previous owner fished the site, why would they be excluded from selling the permit? The goal is to reduce permits.

Lottery for sale – If one wants to reduce harvest of specific stocks then the rationale approach would be to purchase the sites and permits that give one the most benefit for the

cost. The lottery approach does just the opposite. It sets up a system of purchasing sites that provide little benefit. Targeted buy backs and closing waters is much more effective in achieving management goals. For example closing more waters around the mouth of the Kenai River is more effective to put fish in the Kenai than a patchwork of closed waters.

Eligible to vote – the bill limits those who can vote for this buyback. However, the buyback impacts all Upper Cook Inlet permit holders, including the drift gill net fishery. Less fishing power, as noted above, means adjustments in all fisheries will have to be made by management. For example if additional fishing time is given to the drift fleet to harvest surplus fish less fish may move north to the Northern District Set nets and sport fisherman in the Northern District. The impacts of this bill goes far beyond the set net fishery and the Kenai River. The bill states more fish will go into the river – that is not necessarily true for Northern Cook inlet Rivers if the drift fleet fishes more.

Cost of permit -the bill states the permits will be purchased for 260,000 dollars. This is extremely high for a single permit and site without a lease. This is especially true if family units are selling the least productive permit. The cost vs benefit does not make sense. So, what this means is that a family unit keeps making the same amount of money by fishing their productive sites more and thus pockets 260,000/permit on top of it.

Who wins here? The bill is sponsored by some set net fishermen who stand to gain a lot of money while the family unit still fishes productive sites. The sport fishing industry which supports this bill is under the assumption less gear means more fish in the river which is not true. The bill also assumes that the eastside set net fishery is not a viable fishery and a permit reduction will fix this. Again this is suspect. The fishery has seen a reduction in fishing time for the area north of a line on K-Beach but those permits fishing south of that line target Kasilof and Kenai stocks and are fishing more. The reduction in run size of chinook has been the main issue for the eastside set net fishing time on sockeye. This bill will not fix that.

Thank you for your consideration of my comments. If you have any questions please feel free to call.

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