

NAKNEK RIVER SUBSISTENCE PROPOSALS
BOARD OF FISHERIES

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BACKGROUND

Two proposals dealing with the subsistence fishery on the Naknek River have been submitted for consideration by the Board in 1980. Proposal #53 would extend "subsistence" fishing time during mid-summer (June 23-July 17) from the current two 24-hour periods per week to three periods. It would also reduce fishing time before and after the mid-summer season from the present unlimited fishing time to three periods per week. This would increase fishing time on the Naknek River during the peak of the sockeye run, while decreasing it during the king and silver runs.

Proposal #55 would restrict the "subsistence" fishery on the Naknek River to residents of the drainage.

Three sets of questions are raised by Proposals #53. First, is there a conservation problem which requires restrictions on early and late summer Naknek salmon harvests? Second, what are the customary and traditional uses which would be affected by the proposal? And third, if restrictions upon customary and traditional uses are found to be necessary, how can traditional efficiency and the subsistence priority best be protected? The conservation question is a complicated one and will be left to Division of Commercial Fisheries biologists. If it is decided that restrictions upon harvest are necessary for conservation purposes, the second two sets of questions become significant. The remainder of this paper deals with patterns of harvests and utilization of fish in the Naknek drainage and with possible options for protecting king stocks.

USES

Naknek kings and silvers, the species of most concern to these proposals, are harvested by a wide spectrum of users. This discussion will focus on kings since little information is available on the use of silvers. The Division of Commercial Fisheries is presenting tables showing "sport", "subsistence" and "commercial" harvest for the Naknek River. As these tables show levels of effort and harvests in all three categories have been increasing in recent years, and demands for kings are likely to

continue to rise. The term "subsistence"* is placed in quotation marks in this context to indicate that it refers to those users who obtain subsistence salmon permits from the Department, but does not necessarily imply customary and traditional use. Since anyone can obtain a permit to take Bristol Bay salmon for domestic use under existing regulations, this distinction is an important one in cases where restrictions on use for conservation purposes are necessary.

People have been fishing for king salmon with gill-nets on the Naknek River for as long as the oldest residents of the area remember. The king is the first salmon to arrive in the spring, and residents of the river have always welcomed it by sharing the first few fish taken in late May widely throughout the community. The early arrivals of kings has made them important to residents of the river for several reasons. They are the first fresh salmon available at the end of winter. Cooler, drier weather, and the lack of flies in the spring make it easier to put up dried fish, with less spoilage. The high oil content of kings also contributes to their high storage and eating quality.

The focus of commercial fishing in the Naknek River has always been the sockeye run which occurs in late June or July. Few economic opportunities have been available outside this short commercial fishing season. For this reason many South Naknek and Naknek residents, dependent upon the fluctuating and unpredictable returns from commercial fishing, have attempted to put up salmon for food for family use in early summer before commercial markets are available. This pattern has been important as long as local residents have been involved in cannery work and commercial fishing.

Increasing government investment in the Naknek-King Salmon area over the last 35 years in the military base, in the airfield, in schools, law enforcement, and resource management, have resulted in an increasing population of more transient residents. Professionals and technicians come to the area for a year or for a few years and then move on. These people make use of the permit system to take fish for their own use. In general, they take fewer fish and spread their harvests over longer periods of time than do long-term residents dependent upon the commercial fishery. Most have dependable year round incomes and their free time for fishing (evenings and weekends) is distributed evenly over the summer.

*In subsequent text reference to participants in the "subsistence" fishery will be designated by the term "permittee". The term "subsistence users" had been given technical meaning by AS 16.05.940(26); under the statute, it means the customary and traditional uses in Alaska of wild, renewable resources for certain purposes.

These differences in patterns of use are demonstrated in the harvest reports for the Naknek River "subsistence" fishery. South Naknek permittees who fished, for example, probably typify the long-term residents of the river. They took an average of 103 salmon per permit in 1980. Residents of King salmon, which includes more transients and more recent arrivals than Naknek and South Naknek, took an average of 66 salmon per permit fished. The permits showed that most South Naknek people fished from late May to late June, while King Salmon residents fished throughout the summer.

The third major group of people who obtain permits for fishing on the Naknek River "subsistence" fishery become distinct only in the past year. These are people from Anchorage and other areas outside Bristol Bay. Although the number of these "outsiders" taking Naknek fish with gill-nets gradually increased during the late 1970's, in 1980 a major jump occurred in their numbers (see Table 1). This year, of the 358 fishing permits issued for the Naknek drainage, 147, or 41%, were issued to people who listed their address as a community outside Bristol Bay. More permits were issued to people who gave a general delivery address in Naknek or King Salmon and were probably summer transients.

The number of permits issued for the Naknek River jumped from 243 permits in 1979 to 358 in 1980, an increase of 47%. This contrasts with the 7% average annual rate of increase from 1974 to 1979. Most of this increase from 1979 to 1980 was due to Anchorage and other Southcentral Alaskan residents obtaining Bristol Bay permits. Forty-one percent of the permits issued for the Naknek River in 1980 went to people who listed addresses outside the Bristol Bay region, mainly from the Anchorage-Kenai areas.

Reasons for this increase appear to include increasing public awareness of the permitted system, publicity about huge Bristol Bay salmon runs in 1979 and 1980, and increased availability of permits. Bristol Bay permits were issued to 160 people from the Anchorage office in 1980 (the first time permits had been issued outside of Bristol Bay).

Harvest records show that the "subsistence" harvest is not the most dynamic factor affecting Naknek king salmon populations. Sport and commercial harvests have both increased more rapidly than "subsistence" takes, and more king salmon are taken in the Naknek sport and commercial fisheries than in the "subsistence" fishery. These records also indicate that the permittees from outside the Bristol Bay area take fewer fish than do local residents and focus their efforts on the abundant sockeye salmon rather than kings or silvers. Fishermen from outside the region reported taking 1.8 kings/permit, while residents of the river reported 5.8 kings/permit. Many Anchorage permittees did not even fish. Only 14% of the Naknek River residents who obtained permits did not fish,

compared with 36% of the non-Bristol Bay residents who obtained permits but did not fish. Fishermen from outside the Bristol Bay region also generally tended to fish later in the summer than did long-term residents of the region.

Conversations with residents of Naknek and South Naknek and a brief review of the permits returned in 1980 revealed that many people fish continuously from the end of May or early June until the third or fourth week of June in order to put up the kings they want for family use.

The harvest records of 11 South Naknek and Naknek households examined indicated that they fished an average of 16 days during late May and June to take an average of 13 kings, for an average of 0.8 kings per day per household. These figures are only suggestive, since the most detailed reports were selected rather than a random sample. South Naknek residents as a whole reported taking 12 kings per permit, while Naknek households reported 5 kings, and King Salmon residents reported 4.5 per permit.

The sample suggests that it takes a long time to harvest the kings local people want in May and early June. This may have been partly due to the pattern of the Naknek king run in 1980, which apparently was spread over a much longer period of time than usual.

Many residents of the Naknek River and Bristol Bay view Proposal #53 as an attempt to allocate king and silver salmon to sport fishermen and growing numbers of Anchorage permittees at the expense of the traditional users of these resources.

MANAGEMENT AND REGULATORY APPROACHES

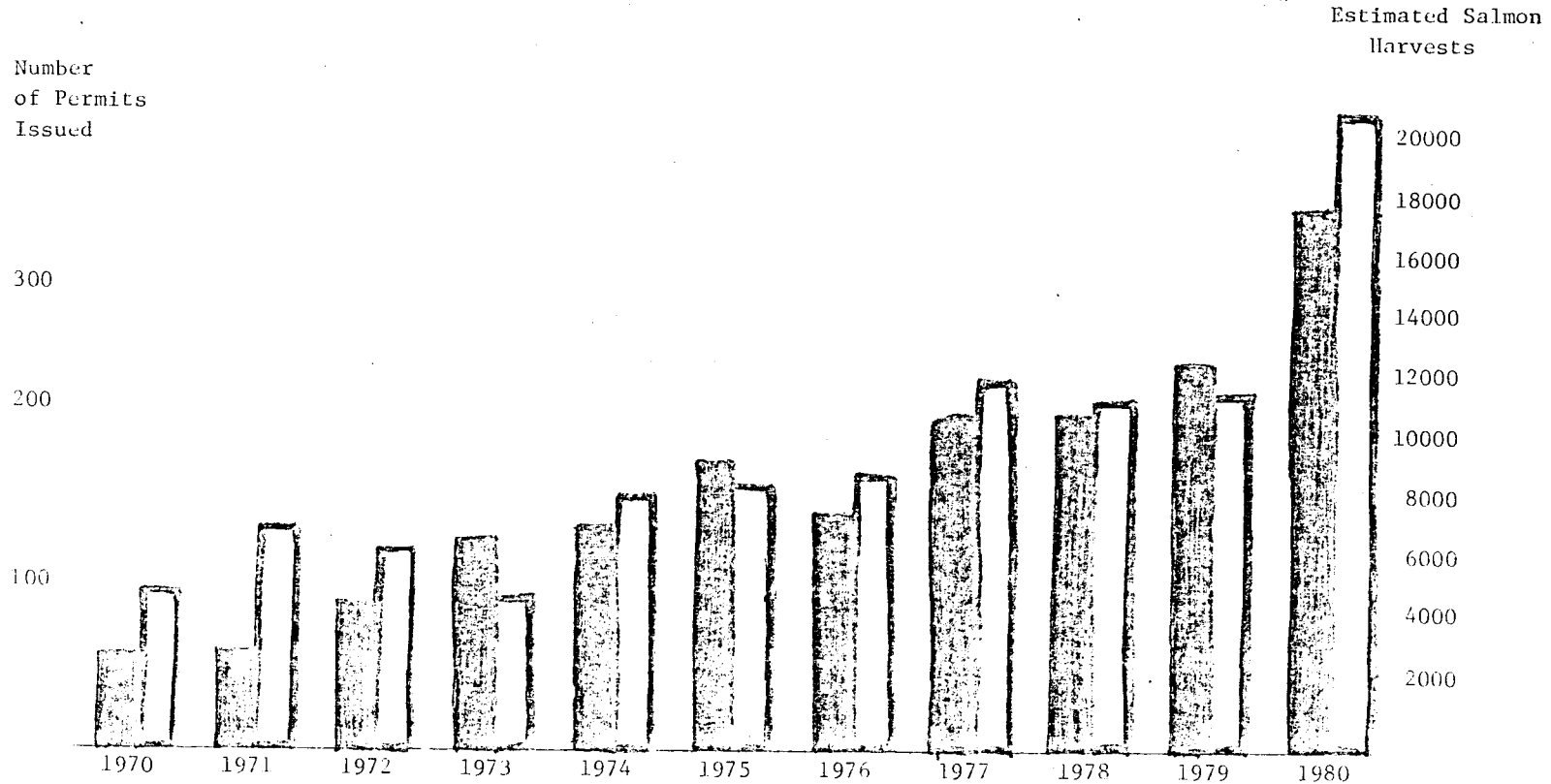
If the board concludes that it is necessary to reduce harvests of Naknek kings and silvers for conservation purposes, a number of options are available. Some of these are described below:

1. Determine what are the customary and traditional uses of Naknek kings. Possible components of this determination could include length of time in the Naknek king fishery and economic attachment to this fishery. Residency in the area might serve as a surrogate measure of these relationships. One obvious customary and traditional use of kings has been to feed the people who live along the banks of the Naknek River. One approach, but certainly not the only one, would be to identify customary and traditional use based on either or both of the following:
 - a. Use of Naknek kings during some portion of recent permit history as indicated by department records.

- b. Use of Naknek kings by the residents of the Naknek-Kvichak drainages similar to the suggestion appearing in Proposal #55.
2. Reduce the commercial harvest of kings in the Naknek-Kvichak district, and continue to improve stock separation information.
3. Reduce sport daily bag limits for king salmon from the existing levels (five per day).
4. Impose subsistence bag limits. This approach would give regulatory strength to present "guideline" harvest limits imposed at the discretion of fishery managers. It could be used to restrict harvest levels. However, it would be difficult to accommodate the high degree of variability between households in size, economic situation, and use of fish through this approach.
5. Impose king quotas and close the commercial and "subsistence" fisheries by emergency order when the quota is reached. This approach is likely to concentrate effort into limited areas and periods of time since people may think they have to take fish as quickly as possible or risk missing out. This could have conservation implications if discrete stocks are running at different times; concentrated effort could over-harvest particular stocks.
6. Reduce gill-net fishing time as proposed in Proposal #53. This option would guarantee escapement between fishing periods and probably reduce king and silver harvests--at least until numbers of fishermen increase further. Such an approach also would allow efficient enforcement of regulations prohibiting waste since Fish and Wild Protection offices could easily check to see that nets had been pulled out of water. However, it would reduce the efficiency of long-established uses and could increase competition and congestion in the best fishing sites.
7. Adopt management plans for Naknek king and silver stocks. A planning process would enable the Department and Board to look at these allocation issues comprehensively.
8. Some combination of the options listed above.

The Subsistence Section plans to continue to monitor trends in Bristol Bay fisheries next summer and will collect more information on the uses of Naknek kings and silvers.

Table 1. Number of "Subsistence" Salmon Permits Issued and Estimated "Subsistence" Salmon Harvests -
Naknek River - 1970-1980





Number of "Subsistence" Salmon Permits Issued- 
 Estimated "Subsistence" Salmon Harvests on Naknek River- 

Table 2 "Subsistence" Permit Allocation and Reported Catch by Place of Residence, Naknek River, 1980.

Address	Number of Permits Returned	Number of Permits Reporting Harvest of Fish	Reported Catch in Numbers of Fish- Naknek River- 1980					
			Sockeye	King	Chum	Pink	Coho	Total
South Naknek	24	20	1411	292	71	147	144	2066
Naknek ⁺	62	53	2857	330	216	560	236	4199
King Salmon ⁺	54	47	2579	188	71	154	124	3166
"Outside" (Anchorage and other addresses outside Bristol Bay*)	112	72	3775	205	202	330	105	4617
Totals	252	192	10,662	1015	560	1191	609	13,998

+ (includes an unknown number of transients reporting addresses in these communities, but spending winters elsewhere)

* (includes those people who listed King Salmon Air Force Station as their address)

#16 DRESSILL Mon Nov 17 10:37 (56) U

24 25 26

#24 DRESSVILL Sun Nov 16 00:13 (64) Reg.

BRISTOL BAY SUBSISTENCE SALMON PROPOSALS-1980

NAKNEK RIVER ISSUES

STEVE BEHNKE SUBSISTENCE SECTION DILLINGHAM

TWO PROPOSALS DEALING WITH SUBSISTENCE FISHING ON THE NAKNEK RIVER HAVE BEEN SUBMITTED FOR CONSIDERATION BY THE BOARD OF FISHERIES IN 1980. PROPOSAL #53, SUBMITTED BY THE NAKNEK-KVICHAK ADVISORY COMMITTEE, WOULD CHANGE THE EXISTING SUBSISTENCE FISHING PERIODS ON THE NAKNEK RIVER FROM TWO DAYS PER WEEK BETWEEN JUNE 23 AND JULY 17, WITH UNRESTRICTED FISHING TIME BEFORE AND AFTER THIS TIME, TO THREE OPEN PERIODS PER WEEK THROUGH THE ENTIRE SUMMER.

FISHING TIME DURING THE MAIN SOCKEYE RUN WOULD THUS BE EXTENDED, BUT FISHING TIME DURING THE EARLY SUMMER AND FALL WOULD BE REDUCED. PROPOSAL #53 IS INTENDED TO REDUCE FISHING TIME DURING THE KING AND SILVER SALMON RUNS IN ORDER TO GIVE THOSE SPECIES MORE OPPORTUNITY TO GET PAST SUBSISTENCE NETS AND INTO UP-RIVER SPAWNING AREAS. THE PROPOSAL WAS SUBMITTED LARGELY IN RESPONSE TO A PERCEIVED PROBLEM OF INCREASING SUBSISTENCE FISHING EFFORT ON THE NAKNEK RIVER, AND OUT OF CONCERN THAT THIS INCREASED EFFORT WILL LEAD TO EXCESSIVE HARVESTS OF THE LIMITED KING AND SILVER STOCKS OF THAT DRAINAGE.

PROPOSAL #55, SUBMITTED BY A SOUTH NAKNEK RESIDENT, WOULD PERMIT ONLY RESIDENTS OF THE WATERSHED TO SUBSISTENCE FISH ON THE NAKNEK RIVER. IT WAS SUBMITTED LARGELY IN RESPONSE TO RUMORS THAT THE KING SALMON FISHING TIME WOULD BE REDUCED AS SUGGESTED IN PROPOSAL #53.

A DRAMATIC INCREASE OCCURRED IN THE NUMBER OF SUBSISTENCE SALMON PERMITS ISSUED IN BRISTOL BAY IN 1980. THE TOTAL NUMBER OF PERMITS ISSUED IN THE BAY JUMPED FROM 829 IN 1979 TO 1233 IN 1980. IN THE NAKNEK DRAINAGE THERE WAS A 47% INCREASE, FROM 243 PERMITS IN 1979 TO 358 IN 1980. THIS CONTRASTS WITH THE 9% AVERAGE ANNUAL INCREASE IN NUMBERS OF PERMITS ISSUED FROM 1975 TO 1979. INCREASING NUMBERS OF ANCHORAGE AND RAILBELT ALASKAN RESIDENTS ARE COMING TO BRISTOL BAY TO TAKE SALMON. ANCHORAGE AND OTHER NON-WATERSHED RESIDENTS OBTAINED 57% OF THE 772 SUBSISTENCE PERMITS ISSUED FOR THE EASTERN HALF OF BRISTOL BAY IN 1980. MOST OF THIS INCREASED INTEREST AND EFFORT HAS FOCUSED ON THE AREAS MOST ACCESSIBLE FROM ANCHORAGE, PARTICULARLY THE ILIAMNA AND NAKNEK AREAS. MANY PEOPLE FEEL THAT THE SMALL NAKNEK RIVER KING RUN, WHICH IS ALREADY HEAVILY HARVESTED BY SPORT AND SUBSISTENCE USERS, AND TO AN UNKNOWN EXTENT BY COMMERCIAL INTERCEPTION FISHERIES, IS THREATENED BY THIS GROWING "SUBSISTENCE" FISHERY.

MANY SOUTH NAKNEK AND NAKNEK RESIDENTS CUSTOMARILY ATTEMPT TO FINISH THEIR SUBSISTENCE FISHING EARLY IN THE SUMMER BEFORE THE COMMERCIAL SEASON BEGINS IN EARNEST. MANY OF THEM ARE SET-NETTERS, WITH RELATIVELY LOW INCOMES, AND THE EARLY KING RUN, BESIDES PROVIDING A HIGHLY VALUED FOOD, GIVES THEM AN OPPORTUNITY TO PUT UP FISH FOR PERSONAL USE WITHOUT LOSING INCOME BY KEEPING COMMERCIALY CAUGHT SOCKEYE FOR THIS PURPOSE..

WITH THE LIMITED GEAR (10 FATHOMS) ALLOWED BY REGULATION, SOUTH NAKNEK RESIDENTS REPORT THAT IT OFTEN TAKEN TWO TO THREE WEEKS OF STEADY FISHING IN LATE MAY AND EARLY JUNE TO HARVEST FAMILY REQUIREMENTS OF 10-25 KINGS. THEY FEEL THAT 3 DAYS OF FISHING TIME PER WEEK WOULD NOT ALLOW THEM TO TAKE THE KINGS THEY CUSTOMARILY USE.

PROPOSAL #53 WOULD UNDOUBTEDLY PERMIT MORE KINGS AND SILVERS TO GET PAST THE LOWER RIVER. HOWEVER, IT FAILS TO ADDRESS THE CAUSES OF THE PERCEIVED PROBLEM, THAT OF INCREASING NUMBERS OF FISHERMEN. ESSENTIALLY PROPOSAL #53 ASKS THAT THE CUSTOMARY USERS OF KINGS, THE RESIDENTS OF THE RIVER, CURTAIL THEIR SUBSISTENCE HARVESTS SO THAT MORE SPORT FISHERMEN AND ANCHORAGE "SUBSISTENCE" FISHERMEN CAN TAKE FISH.

PROPOSAL #55, ON THE OTHER HAND, AIMS DIRECTLY AT THE FOOT OF THE PERCEIVED PROBLEM, SINCE IT WOULD LIMIT SUBSISTENCE FISHING TO THE

PROPOSAL #55, ON THE OTHER HAND, AIMS DIRECTLY AT THE ROOT OF THE PERCEIVED PROBLEM, SINCE IT WOULD LIMIT SUBSISTENCE FISHING TO THE PEOPLE WHO LIVE IN THE AREA. OBVIOUSLY A WHOLE HOST OF LEGAL/POLITICAL PROBLEMS SURROUND THIS APPROACH, BUT IT PRESENTS AN OPPORTUNITY TO CONSIDER CAUSES AS WELL AS SYMPTOMS IN THE RESOLUTION OF THIS ISSUE.

#25 JGSUBSEC Mon Nov 17 06:32 (10) C

TO: JAKET FROM: PAUL

JANET, ARE YOU PLANNING TO ATTEND THE REGIONAL MEETING IN SITKA ON THE 20TH AND 21ST?

AM CURIOUS AS TO YOUR PLANS :IF YOU'RE PLANNING TO ATTEND ,LET ME KNOW SO WE CAN GET OUR GAME PLAN IN ORDER.I WOULD APPRECIATE your attending, BUT I DON'T WANT TO IMPACT YOUR SCHEDULE. RSVP./CHEERS/PAUL.

(MY WEEK END WAS TERRIBLE-BEGINNING FRIDAY, I MISSED MY FLIGHT, AND HAD TO CATCH THE RED EYE SPECIAL SAT. A.M., GETTING IN TO JNO AT 11:30. SIMPLY MARVELOUS WAY TO BEGIN A WEEKEND!!!!)

TAKE CARE.

#26 JGSSBILL Mon Nov 17 10:37 (56) U

TO: TOM LONNER
DENNIS KELSO
LINDA ELLANNA

this a continuation of memo
BRISTOL BAY SUBSISTENCE SALMON PROPOSALS-1980
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ARE PERCEPTIONS OF A PROBLEM WITH KING ESCAPEMENT AND HARVESTS ON THE NAKNEK RIVER BASED ON BIOLOGICAL REALITY HOWEVER? IS THERE ACTUALLY A PROBLEM?

ESCAPEMENT DATA FOR THE PAST DECADE SHOWS FAIRLY LOW ESCAPEMENTS (2600-4000 FISH) IN THE EARLY 1970'S, WITH SIGNIFICANTLY HIGHER ESCAPEMENTS (9000-11000 FISH) TO THE NAKNEK SYSTEM IN THE LATE 1970'S, DESPITE RISING SUBSISTENCE AND SPORT HARVESTS. HARVEST DATA SEEMS TO INDICATE THAT KING SALMON HARVESTS HAVE NOT INCREASED NEARLY AS RAPIDLY AS NUMBERS OF SUBSISTENCE PERMITS. THE GREAT GROWTH IN KING HARVESTS ANTICIPATED BY SOME PEOPLE MAY NOT MATERIALIZE. CERTAINLY THE 29% INCREASE IN THE NUMBER OF KINGS HARVESTED IN THE NAKNEK RIVER BETWEEN 1976 AND 1980 HAS NOT BEEN PROPORTIONAL TO THE 63% INCREASE IN THE NUMBER OF SUBSISTENCE PERMITS ISSUED IN THE SAME YEARS. NEW SUBSISTENCE PERMITTEES APPEAR TO FOCUS PRIMARILY ON SOCKEYE RATHER THAN KINGS, AND DO NOT TAKE AS MANY FISH PER PERMIT AS RESIDENTS OF THE REGION.

THIS DATA DOES NOT APPEAR TO SUPPORT THE NEED FOR SIGNIFICANT HARVEST RESTRICTIONS. NO PROPOSALS STRESSING A BIOLOGICAL PROBLEM ON THE NAKNEK RIVER CAME FROM DEPARTMENT BIOLOGISTS, ALTHOUGH THE POSSIBLE NEED OF SUCH A PROPOSAL WAS INFORMALLY DISCUSSED.

EVEN IF IT IS DETERMINED THAT A BIOLOGICAL PROBLEM EXISTS THE QUESTION OF WHO IS RESPONSIBLE FOR THE OVERHARVEST, AND WHICH GROUPS SHOULD BEAR THE BURDEN OF REDUCED HARVESTS REMAINS. SPORT HARVESTS ON THE NAKNEK RIVER INCREASED MUCH MORE RAPIDLY THAN SUBSISTENCE HARVESTS IN THE LATE 1970'S. ALMOST TWICE AS MANY KINGS ARE TAKEN WITH SPORT GEAR ON THE NAKNEK AS ARE TAKEN IN SUBSISTENCE NETS. THIS WOULD SUGGEST THAT ANY SOLUTION TO A BIOLOGICAL PROBLEM ON THE NAKNEK RIVER SHOULD INCLUDE SOME CONSIDERATION OF FURTHER RESTRICTIONS ON SPORT AS WELL AS SUBSISTENCE HARVESTS.

THE PROPOSAL TO INCREASE FISHING TIME ON THE NAKNEK DURING THE MID-SUMMER SOCKEYE RUN TO THREE DAYS PER WEEK FROM THE EXISTING TWO OPENINGS PER WEEK MIGHT ACTUALLY BE ENOUGH TO SHIFT SOME OF THE FISHING EFFORT FROM KINGS TO THE ABUNDANT SOCKEYE. NEVERTHELESS, INCREASING NUMBERS OF SUBSISTENCE PARTICIPANTS IN THE NAKNEK DRAINAGE IMPLY CONTINUING DEMANDS FOR FURTHER RESTRICTIONS TO PROTECT LIMITED STOCKS SUCH AS KINGS AND SILVERS. THE REAL QUESTION REMAINS- HOW CAN WE PROTECT BOTH LIMITED FISH STOCKS AND TRADITIONAL USES OF THESE STOCKS IN VIEW OF INCREASING NUMBERS OF USERS?

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TABLE I
 NUMBERS OF BRISTOL BAY SUBSISTENCE
 SALMON PERMITS ISSUED 1974-1980

	1974	1975	1976	1977	1978	1979	1980
NAKNEK RIVER	132	179	145	203	219	243	358
BRISTOL BAY							
TOTAL	607	700	716	738	770	829	1233

TO : TOM LONNER
 LINDA ELLANNA
 DENNIS KELSO
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part III of memo
 BRISTOL BAY SUBSISTENCE SALMON PROPOSALS-1980

FROM THE FISHERY MANAGER'S PERSPECTIVE PROPOSAL #53 MAKES SENSE BECAUSE IT DEALS WITH SEVERAL PROBLEMS AT ONCE. SECONDLY, UNDER EXISTING REGULATIONS, SPORT FISH BIOLOGISTS ARE FACED WITH THE DIFFICULT TASK OF TRYING TO PERSUADE SPORT FISHERMEN TO ABIDE BY RESTRICTIVE BAG LIMITS AND METHODS, WHILE AT THE SAME TIME SUBSISTENCE FISHERMEN CAN FISH WITH NETS FOR UNLIMITED PERIODS OF TIME, FOR UNLIMITED NUMBERS OF FISH. SPORT FISHERMEN ARE LIMITED TO A DAILY BAG OF FIVE SALMON, OF WHICH ONLY TWO MAY BE KINGS OVER 28 INCHES. SPORT FISHERMEN SEE THE NETS AND EITHER DISREGARD THE LIMITS, OR OBTAIN PERMITS AND PUT OUT NETS THEMSELVES.

THIRDLY, THIS PROPOSAL WOULD PERMIT MORE EFFICIENT ENFORCEMENT AGAINST WASTE, WHICH OCCASSIONALLY OCCURS ON THE NAKNEK RIVER WHEN PEOPLE LEAVE NETS IN THE WATER WITHOUT CHECKING THEM. THIS REGULATION WOULD FORCE PEOPLE TO PICK UP THEIR NETS BETWEEN FISHING PERIODS.

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THESE LAST FEW PARAGRAPHS HAVE BEEN ADDED BECAUSE I REALIZED I HAD NEGLECTED THE BIOLOGISTS PERSPECTIVE ON THIS ISSUE. THEY ARE FIRMLY CONVINCED THAT THERE IS NO REASON WHY SUBSISTENCE KING HARVESTS SHOULDN'T BE REDUCED- "PEOPLE DONT REALLY NEED KINGS FOR SUBSISTENCE ON THE NAKNEK" "THERE'S REALLY NO SUCH THING AS SUBSISTENCE ANYWAY" AND "EVEN IF PEOPLE NEEDED THEM (WHICH THEY DON'T, CAUSE THEY CAN ALWAYS TAKE OTHER SPECIES) THEY CAN GET ALL THE KINGS THEY NEED BY FISHING THREE DAYS PER WEEK".

THE LAST ARGUMENT IS DIFFICULT TO DEAL WITH. ALL I HAVE IN THE WAY OF DATA IS SEVERAL PEOPLE'S WORD THAT IT TAKES FULL FISHING TIME DURING EARLY SUMMER TO GET THE KINGS THEY WANT. HOWEVER, THEIR TIME FRAME IS DIFFERENT FROM THE BIOLOGISTS', SINCE THEY ARE TRYING TO GET FISH PUT UP BEFORE THE COMMERCIAL SEASON BEGINS IN LATE JUNE.

AT ANY RATE, I HAVEN'T COME UP WITH ANY REAL FIRM OPINIONS. ~~SOME~~ PEOPLE AREN'T GOING TO STARVE IF THIS PROPOSAL- #53, IS PASSED. BUT MANY PEOPLE IN BRISTOL BAY WILL VIEW IT AS ANOTHER VICTORY FOR SPORTSMEN OVER THE SUBSISTENCE USER. IT SEEMS CONCEIVABLE THAT SOME GROUP MIGHT TAKE THE MATTER TO COURT IN VIEW OF PUBLICITY ABOUT OTHER SUBSISTENCE ISSUES. IF THIS OCCURS I THINK THAT THE DEPARTMENT'S BIOLOGICAL JUSTIFICATIONS FOR REDUCING FISHING TIME WILL BE FOUND WANTING.

I BELIEVE THE DEPARTMENT (OR COMM. FISH) WILL BE, OR ALREADY IS PULLING TOGETHER AN ISSUE PAPER, OR AT LEAST NOTES FOR THEIR OWN USE WHEN THIS PROPOSAL (#53) COMES UP, AND WILL SUPPORT IT. I FEEL THAT WE SHOULD DISCUSS WHETHER THE SUBSISTENCE ACTION SHOULD COMMENT, OFFER AN ALTERNATIVE (WHICH I HAVEN'T COME UP WITH YET!) OR DEFER.

STEVE.