Good Morning Board of Fish Members,

My name is Joe Baxter, owner/operator of the F/V Marilyn Dawn, SEAK Drift Driftnet permit holder.

I am writing to Oppose SEAK BOF proposals 99 and 100, excluding gillnets from Southeast Cove. My family chose to invest and participate in the SEAK drift gillnet fishery in 2010 after thoroughly examining the previous 35 years of harvest data, available fishing areas, CPUE, gross earnings data, etc. At the time, it was a sound business decision based on all of the above.

Since then, there have been significant restrictions placed on the SEAK gillnet fleet in an effort to meet escapement goals for stocks of concern through the region. These restrictions have generally achieved their goal of reducing the catch of stocks of concern by the gillnet fleet, however they have created a significant negative impacted on the gillnet fleet due to lost time and area available for permit holders to fish. These losses have occurred at the same time that new terminal harvest areas were brought online in Southeast Cove, Crawfish Inlet, and others. The gillnet fleet contributed to the creation of these new THA's through our 3% enhancement tax, and it has been our understanding that these enhanced fish would become available for all gear types, including Gillnets.

Due to many factors, the 2020 SEAK salmon season was the lowest abundance and lowest price in at least 30 years; for many in the gillnet fleet it was not economically viable and they chose to either not fish or significantly reduce their fishing effort. For my family personally, the 2020 season was a financial disaster. During times of low abundance and stocks of concern restrictions, it is imperative for the financial viability of all gear types that alternative areas be made available. This was the original purpose of establishing hatcheries to begin with.

In addition to ADFG's constitutional requirement to provide for maximum sustained yield and the protection of fish stocks, they share the responsibility of providing a safe and effective fishery. SOC restrictions have resulted in increased competition, congestion, conflicts, and risk taking by the gillnet fleet. These issues can be alleviate by providing reasonable fishing opportunity distributed through all of the fishing districts. THA's provide all gear types the opportunity to selectively target enhanced stocks while avoiding stocks of concern. The allocation formula in use today was based on historic harvest data before SOC restrictions closed significant portions of the fishing areas. The reality that SOC restrictions are likely to be in place for the foreseeable future makes it more important than ever to ensure reasonable fishing opportunity is available for all gear types, especially THA's.

I oppose proposals 99 and 100 because they further limit reasonable access to fishing area for the SEAK gillnet fleet at a time when the fleet is already restricted enough. Providing reasonable access to Southeast Cove will ease congestion through the gillnet fleet and provide for a safer and more effective fishery, something that benefits everyone. NSRAA has proven more than capable of managing allocation within historic levels; I ask the BOF please give gillnetters a reasonable opportunity to participate in a THA we help fund through our enhancement tax.

Thank you for considering my comments.

Joe Baxter F/V Marilyn Dawn