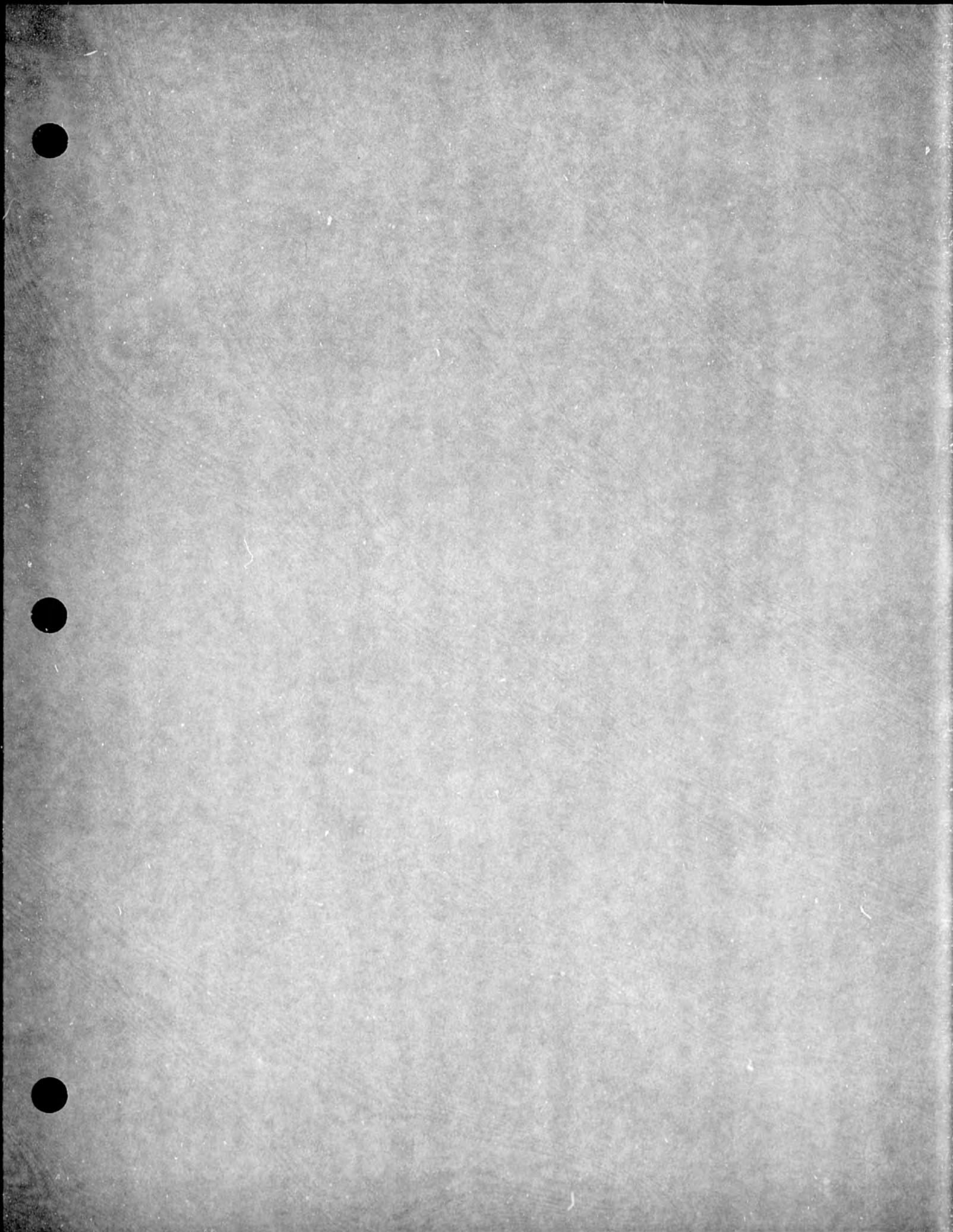


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221

Summary

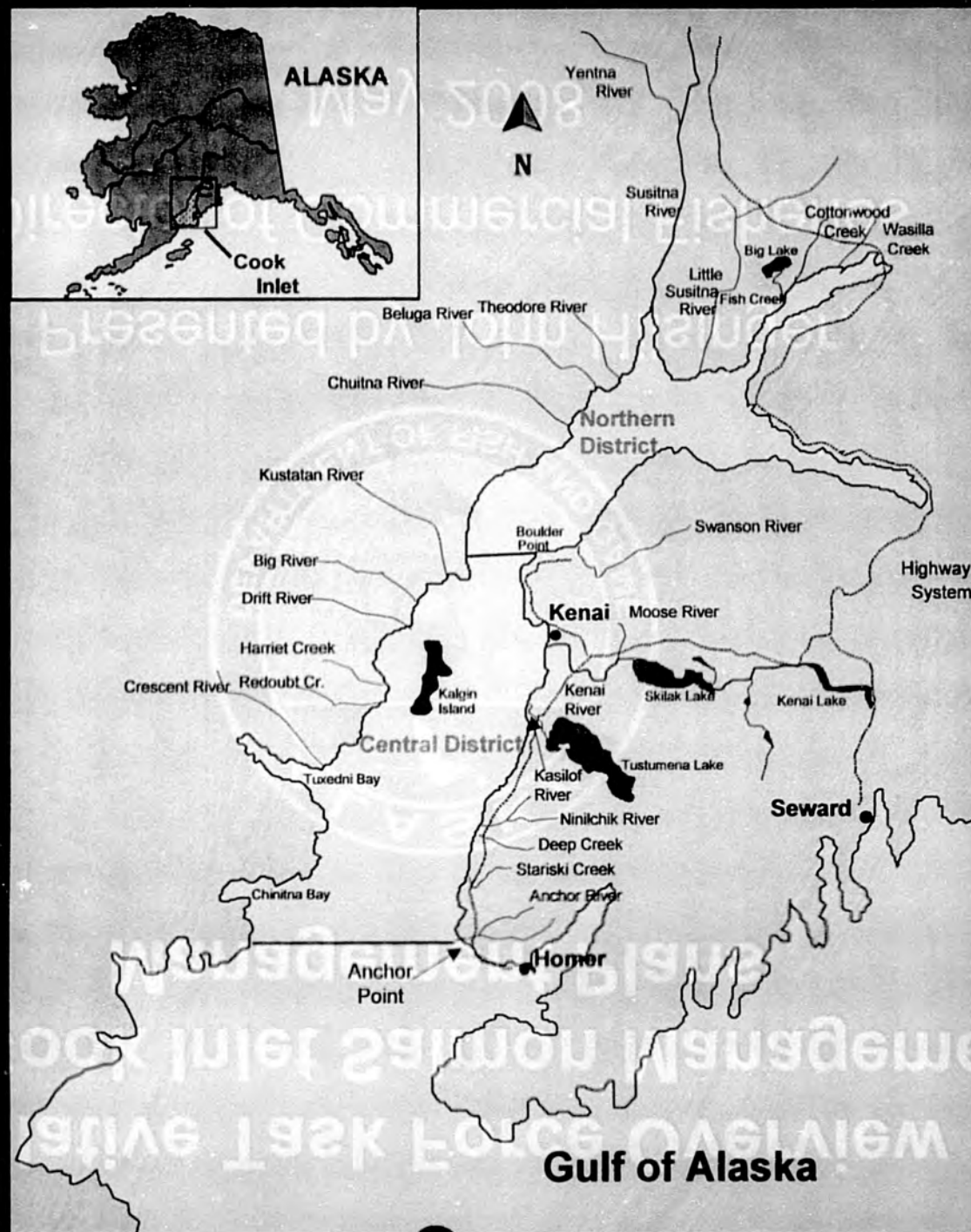
- Constitution mandates fish resources be developed and maintained for sustained yields.
- SSF and EG Policies built on a harvest strategy based on fixed escapements.
- Fixed escapements offer the opportunity for greater yields than with other harvest strategies
- Regular evaluations of goals and management strategies under the SSFP ALMOST assure sustainability.



Legislative Task Force Overview Of Upper Cook Inlet Salmon Management & Management Plans



Presented by John Hilsinger,
Director of Commercial Fisheries
May 2008



Latitude and Longitude are based on the North American Datum of 1983 (NAD 83) which is equivalent to the World Geodetic System 1984 (WGS 84).

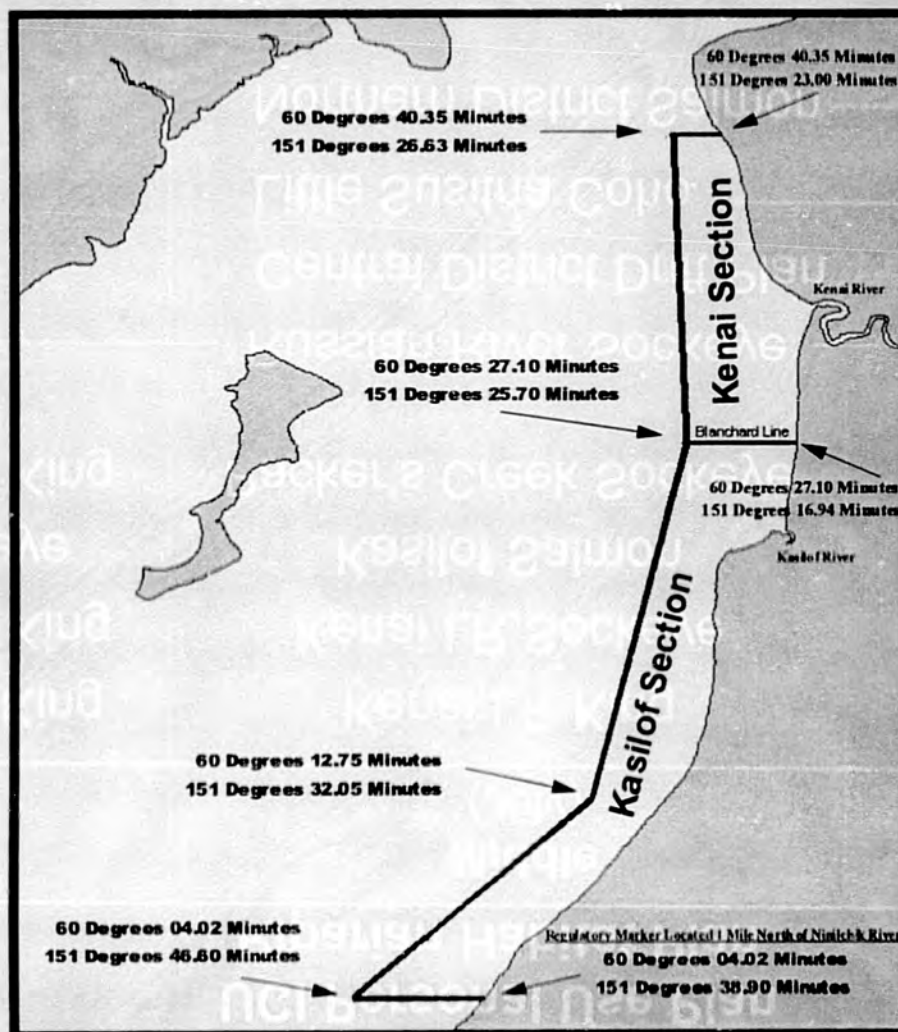


Figure 1. Map of the Kenai and Kaslof Sections with waypoint descriptions.

Organization of Management Plans in Upper Cook Inlet

UCI Salmon Management Plan

Yentna River Subsistence Plan

UCI Personal Use Plan

Riparian Habitat Plan

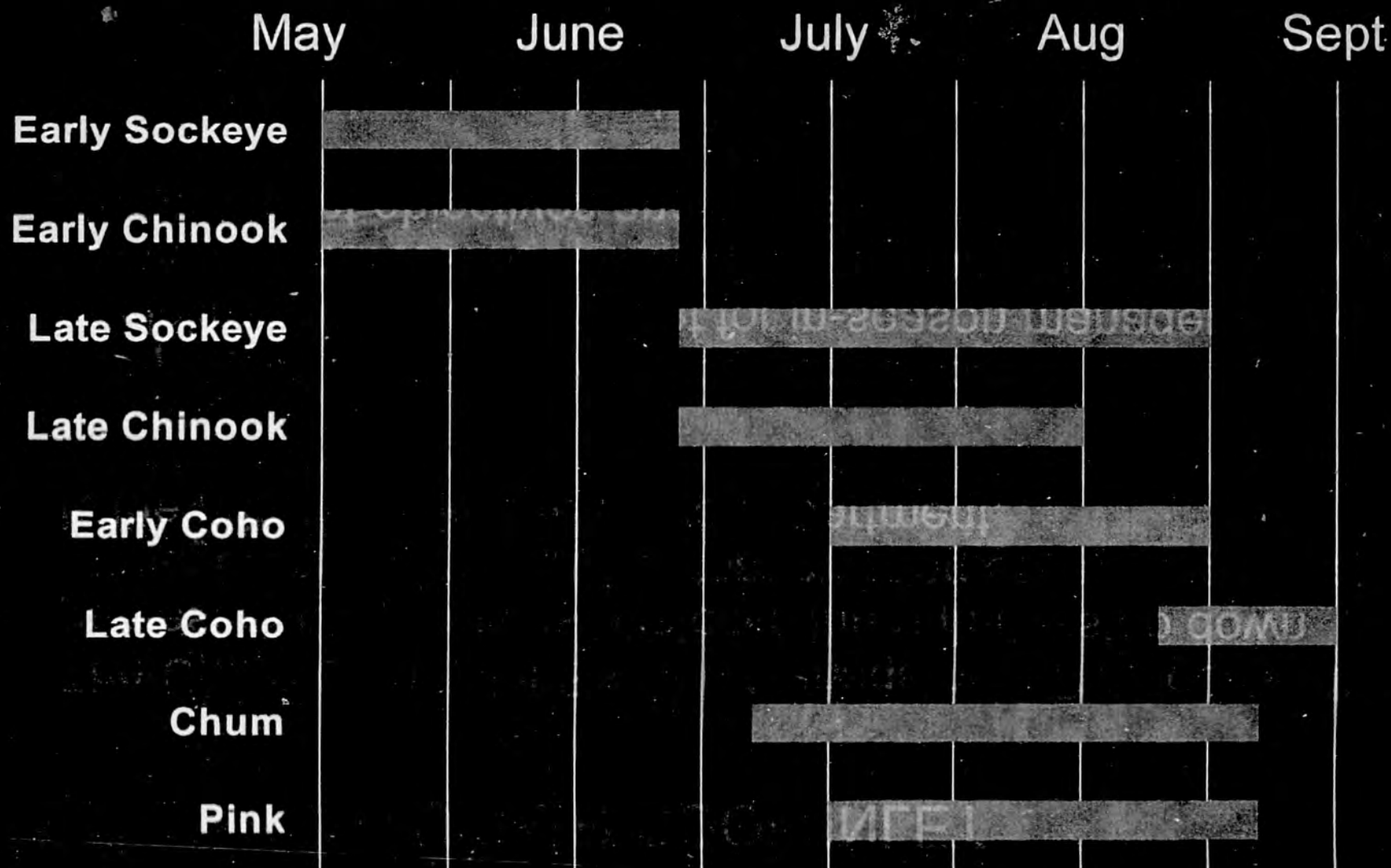
Early (Prior to July 1)	Middle (July)	Late (August →)
Northern District King Kenai/Kasilof ER King Big River Sockeye UCI Marine Early King	Kenai LR King Kenai LR Sockeye Kasilof Salmon Packer's Creek Sockeye	Kenai Coho
←	Russian River Sockeye →	
	Central District Drift Plan →	
	Little Susitna Coho →	
	Northern District Salmon →	

There are a total of 17 management plans in the UCI Mgmt Area 4

OVERVIEW OF SALMON MANAGEMENT PLANS IN UPPER COOK INLET

- The Upper Cook Inlet Salmon Management Plan guides the harvest and allocations of stocks through the step down management plans. States that meeting escapement goals is the primary objective of the department.
- "Step-down plans" provide specific objectives and guidelines to the department for in-season management of salmon resources. Of particular importance are specifying management objectives and allocative instructions.
- Step-down plans are structured around migratory timing of major stocks of salmon moving through Upper Cook Inlet

Run Timing of Salmon in Upper Cook Inlet



Organization of Management Plans in Upper Cook Inlet

UCI Salmon Management Plan

Cook Inlet Subsistence Fisheries

UCI Personal Use Plan

Riparian Habitat Plan

Early (Prior to July 1)	Middle (July)	Late (August →)
Northern District King Kenai/Kasilof ER King Big River Sockeye UCI Marine Early King	Kenai Late Run King Kenai Late Run Sockeye Kasilof Salmon Packer's Creek Sockeye	Kenai Coho
	Russian River Sockeye Central District Drift Plan Little Susitna Coho Northern District Salmon	

UCI Subsistence Fisheries

- Most of UCI is designated as a non-subsistence area.
- Two small subsistence fisheries:
 - Tyonek
 - King salmon fishery in Tyonek Section of Northern District.
 - Set gillnets used.
 - Upper Yentna River
 - Sockeye fishery in upper reaches of Yentna River.
 - Fish wheels with a live box.

PERSONAL USE SALMON MANAGEMENT PLAN

- Parts overlap all timeframes, although emphasis is during the middle-July, timeframe.
- Fisheries:
 - Evolved from the old subsistence fisheries.
 - One remaining set gillnet fishery- targets Kasilof sockeye.
 - Most opportunity is in the two dip net fisheries that target Kasilof and Kenai sockeye.
 - Fisheries are date-triggered and focused on stocks and species of greatest abundance.

RIPARIAN HABITAT FISHERY MANAGEMENT PLANS

- Not specific to any time frame, although emphasis is clearly during the middle time frame (July).
- The objective of these management plans are to provide the ability to regulate inriver fisheries to protect riparian habitat.
- Most of the assessment and application has been for the Kenai River late run sockeye salmon fishery.

Organization of Management Plans in UCI Cook Inlet

UCI Salmon Management Plan Cook Inlet Subsistence Fisheries UCI Personal Use Plan Riparian Habitat Plan

Early (Prior to July 1)	Middle (July)	Late (August →)
Northern District King	Kenai Late Run King	Kenai Coho
Kenai/Kasilof ER King	Kenai Late Run Sockeye	
Big River Sockeye	Kasilof Salmon	
UCI Marine Early King	Packer's Creek Sockeye	
← Russian River Sockeye →		
	Central District Drift Plan →	
	Little Susitna Coho →	
	Northern District Salmon →	

MANAGEMENT PLANS DURING THE EARLY TIMEFRAME (PRIOR TO JULY 1)

- Priority: most stocks managed primarily for recreational purposes.
- Fisheries:
 - Freshwater sport fisheries for king salmon.
 - Sport fishery for early-run Russian River sockeye.
 - Commercial fisheries for Northern Cook Inlet king salmon and Western Cook Inlet sockeye.

MANAGEMENT PLANS DURING THE EARLY TIMEFRAME (PRIOR TO JULY 1)

Northern District King Salmon Management Plan

- Specifically addresses management of commercial fishery in Northern District. The Northern District king salmon fishery open for Monday periods between May 25 and June 24. (5 in 2008)

Kenai R. and Kasilof R. Early Run King Salmon Conservation Mgmt. Plan

- Purposes are to ensure adequate escapement, conserve unique large size Kenai River kings, and provide management guidelines.
- Primarily Governs the sport fishery harvest.

Russian River Sockeye Salmon Management Plan

- Purpose is to ensure adequate escapement and provide management guidelines to department to preclude allocation conflicts.
- Early run harvested primarily by sport fishery, late-run harvested by sport, commercial and personal use fisheries.

Big River Sockeye Salmon Management Plan

- Specifically addresses management of commercial fishery in the Kustatan Subdistrict and the west side of the Kalgin Island Subdistrict.

UCI Marine Early King Salmon Management Plan

- Primarily Governs the sport fishery king salmon harvest in the Deep Creek Area 13

Organization of Management Plans in Upper Cook Inlet

UCI Salmon Management Plan Cook Inlet Subsistence Fisheries UCI Personal Use Plan Riparian Habitat Plan

Early (Prior to July 1)	Middle (July)	Late (August →)
Northern District King Kenai/Kasilof ER King Big River Sockeye UCI Marine Early King	Kenai Late Run King Kenai Late Run Sockeye Kasilof Salmon Packer's Creek Sockeye	Kenai Coho
	Russian River Sockeye Central District Drift Plan Little Susitna Coho Northern District Salmon	   

MANAGEMENT PLANS DURING THE MIDDLE TIMEFRAME (JULY)

- Sockeye, chum, and pink salmon stocks, which move through UCI, will be managed primarily for commercial uses.
- Kenai late run king salmon stocks managed primarily for sport and guided sport uses,
- Minimize the incidental take of Northern District coho, late Kenai king, and Kenai coho.
- Major Fisheries: commercial, personal use, sport, guided sport.

KENAI RIVER LATE RUN SOCKEYE SALMON MANAGEMENT PLAN

- Directs department to manage Kenai Late Run sockeye:
 - Primarily for commercial uses
 - Minimize commercial harvests of ND coho, late-run Kenai king, and Kenai coho to provide PU, sport and guided sport reasonable opportunity to harvest salmon,
 - Management objectives specified are: 1) meet OEG range, achieve in-river goals, and distribute escapements evenly within OEG range in proportion to run size.
- Establishes in-river goals based on abundance (<2 mil, 2-4 mil, >4 mil) and provides management guidelines for each run strength range.
- 2008 Kenai R. sockeye salmon projection is 2-4 million with in-river goal= 750,000-950,000
- Gives direction regarding habitat

KENAI RIVER LATE-RUN KING SALMON MANAGEMENT PLAN

- Provides for adequate escapement of late-run king salmon.
- Directs department to manage this stock primarily for sport and guided sport uses.
- Includes direction on managing sport, guided sport, and commercial fisheries and conducting habitat assessment.

KASILOF RIVER SALMON MANAGEMENT PLAN

- Governs the harvest of Kasilof sockeye salmon excess to escapement needs, directs department to manage this stock to be harvested in fisheries that have historically harvested them.
- States achieving lower end of Kenai OEG shall take priority over not exceeding upper end of Kasilof OEG.
- Sets commercial season opening dates and allowable fishing time including limits on additional fishing time and mandatory closed periods.
- From the beginning of the fishery through July 7, no more than 48 hours of additional fishing time per week and to close the fishery for 36 consecutive hours per week (changed from 48 floating closed window at BOF in 2008), which will begin between 7:00 p.m. on Thursdays and 7:00 a.m. on Fridays.
- States that using Special Harvest Area should be rarely used, and only after exhausting other methods.
- Regulates guided sport fishery for king salmon.
- Tied to Kenai R. late run sockeye salmon management plan after July 7

Central District Drift Gillnet Fishery Management Plan

- Central District: all waters between a line extending from Boulder Point, to Shell Platform C, to a point on the west shore, and the latitude of Anchor Point Light.
- Kenai and Kasilof Sections, Drift Areas 1, 2, 3, and 4
- 3.1 million sockeye projected run size for the Kenai River in 2008
- From July 9 - July 15, fishing is restricted for two regular fishing periods to the Kenai and Kasilof Sections and Drift Area 1; Because of past difficulties in achieving the Yenta River escapement goal of 90,000 to 160,000 sockeye salmon, the department will further restrict the July 10 regular drift fishing period to the Kenai and Kasilof Sections only.
- From July 16 - July 31, two of five regular drift periods are restricted based on the size of the Kenai sockeye run: (a) if < 2 million, drifting restricted to Area 1 and Kenai/Kasilof Sections; (b) if 2-4 million (2008), restricted to Areas 1 & 2 and Kenai/Kasilof Sections; (c) if >4 million, no restrictions.

NORTHERN DISTRICT SALMON MANAGEMENT PLAN

- Directs the department to manage harvest of Northern District chum, pink, and sockeye for commercial uses
- Directs the department to “minimize” the harvest of Northern District coho salmon to provide sport and guided sport reasonable opportunity to harvest by:
 - Additional Northern District periods not allowed if coho salmon expected to be most abundant stock in harvest,
 - Regular periods only in the Northern District after August 15.
 - Achieving lower end of Yentna escapement goal shall take priority over not exceeding upper end of Kenai OEG.

Organization of Management Plans in Upper Cook Inlet

UCI Salmon Management Plan
Cook Inlet Subsistence Fisheries
UCI Personal Use Plan
Riparian Habitat Plan

Early (Prior to July 1)	Middle (July)	Late (August →)
Northern District King Kenai/Kasilof ER King Big River Sockeye UCI Marine Early King	Kenai LR King Kenai LR Sockeye Kasilof Salmon Packer's Creek Sockeye	Kenai Coho
←	Russian River Sockeye	→
	Central District Drift Plan	→
	Little Susitna Coho	→
	Northern District Salmon	→

KENAI RIVER COHO SALMON CONSERVATION MANAGEMENT PLAN

THE LATE TIMEFRAME (August - September)

- Directs department to manage Kenai coho primarily for sport and guided sport uses
- East side set nets close August 15, unless closed earlier by EO after July 31, if the department determines that less than one percent of the season's total sockeye harvest has been taken per fishing period for two consecutive fishing periods
- Closes sport and guided sport fisheries on November 30

OVERVIEW OF SALMON MANAGEMENT PLANS IN UPPER COOK INLET

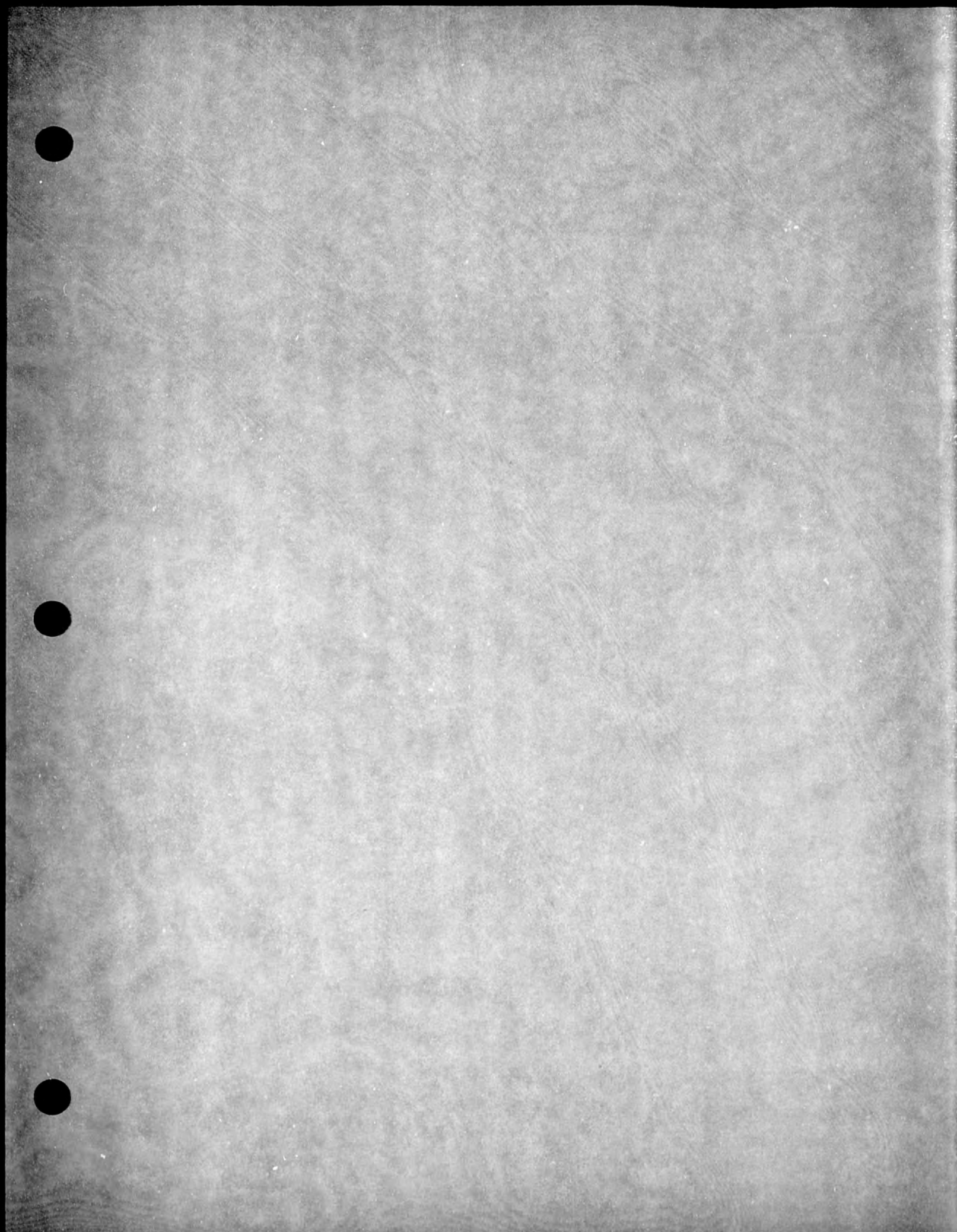
Summary :

- Meeting escapement goals are the primary objective of all management plans.
- Management plans are structured around migratory timing of major stocks of salmon moving through Upper Cook Inlet.
- “Step-down” plans provide specific management objectives to the department for management and allocation of fisheries.

OVERVIEW OF SALMON MANAGEMENT PLANS IN UPPER COOK INLET

Summary :

- In Feb, 2008 BOF passed two new gear regulations for the commercial fishery:
 - All web may be single-filament (mono)
 - Provided for "stacking" on drift boats, i.e., two permit holders may fish on one boat and add an extra 50 fathoms of gear during regular fishing periods (normal maximum amount of gear is 150 fathoms per permit; this allows for up to 200 fathoms total)
 - Outlawed the use of spotter planes one-hour before a fishery opens and while the fishery is being prosecuted
 - Susitna River sockeye salmon found by the Board to be a stock of yield concern. Action plan was developed to conservatively manage the commercial fishery while research continues



SITE: Kenai LIO

COMMITTEE: Joint Legislative Cook Inlet Salmon Task Force

DATE: 5-22-08

AGENDA:

Presentation by Dept. of Fish & Game;
Kenai Peninsula public testimony

UPDATE #: Final Stats

TESTIFY

Y or N

PRINT YOUR NAME

TOWN / CITY

REPRESENTING / AFFILIATION

Y	Gunnar Knapp	Anchorage	ISER
Y	Bill Wirin	Soldotna	Self / B&B owner
Y	Roland Maw	Soldotna	United Cook Inlet Drift Association
Y	Dwight Kramer	Kenai	Kenai Area Fishermen's Coalition
Y	Herman Fandel	Kenai	Self
Y	Irene Fandel	Kenai	Self
Y	Dennis Gease	Kenai	SCADA
Y	David Martin	Clam Gulch	Self
Y	Ron Rainey	Kenai	Self
Y	William Toppa	Soldotna	Self
Y	Rod Berg	Soldotna	Self
Y	Vincent Goddard	Kenai	Local Processing Co.
Y	Bob Penney	Soldotna	Cook Inlet Sport Fish Caucus
Y	Dick Erkeneff	Soldotna	Self

TESTIFY

Y or N

PRINT YOUR NAME

TOWN / CITY

REPRESENTING / AFFILIATION

Y	Gary Fandrei	Kenai	Cook Inlet Aquaculture Association
Y	Ricky Gease	Soldotna	Kenai River Sportfishing, Inc.
Y	Randy Berg	Soldotna	Self
Y	John Efta	Kenai	Self
Y	Brent Johnson	Clam Gulch	Kenai Peninsula Fisherman's Association
Y	Lee Martin	Homer	CIAA
Y	Dave Carey	Soldotna	Mayor / City of Soldotna
Y	Reuben Hanke	Soldotna	Self
Y	Ken Tarbox	Soldotna	Self
Y	Bob Merchant	Kenai	Self
Y	Bruce Gabrys	Eagle River	Self – com fish
Y	Paul R. Zobeck	Soldotna	Self – guide
Y	Bill Griffin	Soldotna	Self – guide
Y	Greg Landeis	Sterling	Self – taxidermist
Y	Karl Kircher	Kasilof	Self
Y	Dan Thompson	Kenai	Self – com fish
Y	Julie Marcinkowski	Nikiski	Self – com fish

TESTI

Y or N

PRINT YOUR NAME

TOWN / CITY

REPRESENTING / AFFILIATION

U	The following signed up to testify	but were unable to	do so before the meeting ended
U	Gary Hollier	Soldotna	Self – com fish
U	Jack Brown	Kasilof	Self
U	Debbie Brown	Kasilof	Self
U	Don Johnson	Soldotna	Self
U	Mike Fenton	Soldotna	Self
U	Eric Beeman	Kenai	Self
U	Mike Kinney	Soldotna	Self
U	Steve Tvenstrup	Kenai	Self
U	Mel Krogseng	Soldotna	Self
U	Arch Richardson	Soldotna	Self
U	Jim Johnson	Soldotna	Self
U	Andy Szczesny	Soldotna	Self

TESTIFY

Y or N

P R I N T YOUR NAME

TOWN / CITY

REPRESENTING / AFFILIATION

N	Suzanne Mixwell	Soldotna	Fish & Game
N	April Faulkner	Soldotna	Fish & Game
N	Leon Marcinkowski	Nikiski	Self
N	Betty Gilcrist		Self
U	Greg Gabriel	Kenai	Self
N	Jim Wilson	Soldotna	Self
N	Duff Hoyt	Homer	Icicle Seafoods
N	Larry Reutov	Homer	Self – drift fisherman
N	Wayne Kuasvikoff	Nikiski	Processor
N	Mike Sutton	Ninilchik	Self
N	Richard Waisanen	Soldotna	Self
N	Shell Bloch	Soldotna	Self
N	Jim Golden	Soldotna	Sports Den
N	Steve Vanek	Ninilchik	Self
N	Tom Walker	Kenai	Self
N	George Showalter	Kenai	Self
N	Tina Showalter	Kenai	Self

TESTI

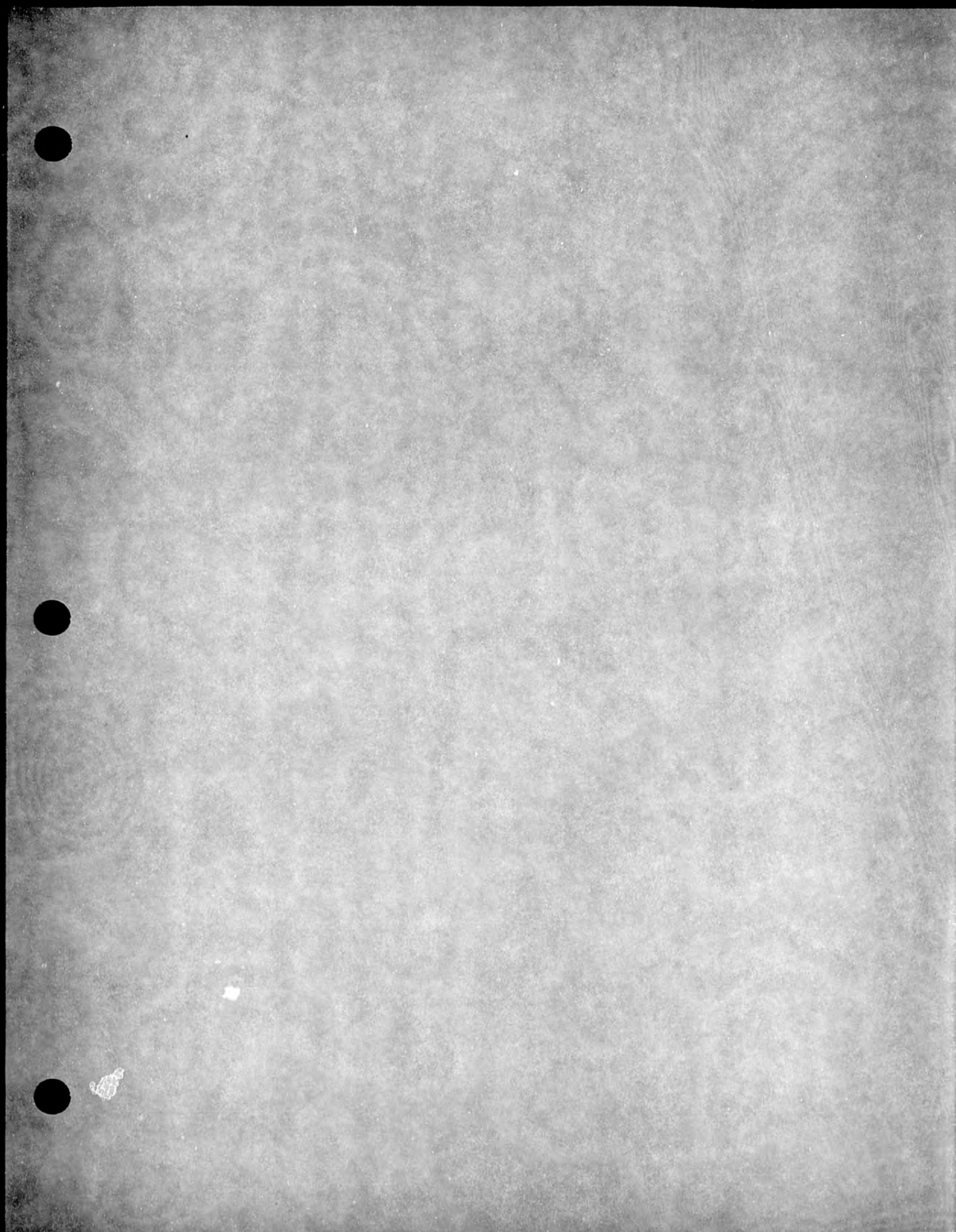
Y or N

PRINT YOUR NAME

TOWN / CITY

REPRESENTING / AFFILIATION

N	Michael Swan	Soldotna	Self
N	Marcie Swan	Soldotna	Self
N	Monte Roberts	Soldotna	Self
N	Scott Aksamit	Soldotna	Self
N	Jim Butler	Kenai	Self





**KENAI RIVER SPORTFISHING
ASSOCIATION**

To: Marine Stewardship Council Certification – 2008 Surveillance Audit
Certification Body: Moody Marine Ltd.
From: Kenai River Sportfishing Association
Date: May 16, 2008
RE: Comments on Cook Inlet Surveillance Audit

Thank you for the opportunity to provide comments on the annual surveillance audit of the Alaska Commercial Salmon Fisheries. Kenai River Sportfishing Association is a 501 c 3 non-profit fishery conservation organization located in Soldotna, Alaska. Through our work in fisheries management and research, we are very engaged in the management and oversight of the Cook Inlet salmon fisheries. We share the Marine Stewardship Council's objective of sustainable and well-managed fisheries. We understand that the MSC identified five (5) areas of concern for Upper Cook Inlet salmon stocks during the 2007 recertification process. Toward that end, we offer the following comments regarding changes in management of the commercial salmon fishery in Upper Cook Inlet that we believe will address Conditions of Certification raised in the recent assessment.

Upper Cook Inlet fisheries are managed under a suite of interrelated management plans which have been approved by the Alaska Board of Fisheries (Board). During the 2008 regulatory meeting of the Board a number of significant changes were made to these plans. These changes included significant liberalization of commercial fisheries for sockeye, chinook and coho, and increased commercial fishery management discretion to implement management measures outside of existing management plans to access large returns of strong Kenai and Kasilof sockeye stocks. These changes raise significant questions regarding the adequacy of protective measures for other less productive (Susitna sockeye) or poorly monitored (Kasilof Chinook, early-run coho) stocks and the consistency with conditions established by the MSC for continuing certification. A detailed description of those concerns follows:

Condition 35. Complete evaluations of sockeye and assess Kasilof chinook stock composition in fisheries to ensure accuracy of post-season analyses and clarify effectiveness of inseason time and area management. [Upper Cook Inlet]

Sockeye

Genetic stock identification studies for sockeye were implemented in 2005-2007 and initial results were reported in December 2007 (ADFG Fishery Manuscript 07-17). Results highlight the very high power of the SNPs genetic method for accurate stock identification. Initial results suggest that time and area stock composition is substantially different than has been previously assumed. For instance, significant numbers of Susitna sockeye are harvested in some periods in east side set net fisheries while historical run reconstructions assumed that no Susitna sockeye were harvested in this fishery. However, the analysis and results are incomplete. Only a portion of the samples from each year were analyzed and all portions of the fishing season were not evenly represented. Samples do not provide needed information

on some fishing times and areas (e.g. the effectiveness of corridor restrictions for protecting Susitna sockeye). GSI results have not been systematically compared to the long-used age-based stock apportionment method in order to evaluate biases in the historical dataset and run reconstructions that provide the basis for escapement-based management of all UCI sockeye stocks. Further, run timing and fishery patterns during the study period were not typical and may not be representative of other years. The priority and plans of additional genetic stock identification work for UCI sockeye remain unclear.

Completion of previous genetic studies and implementation of an annual genetic sampling program for sockeye stock identification are requisite to accurate assessments of run strength, harvest, and productivity of UCI sockeye stocks.

Kasilof Chinook

No effective Chinook stock identification methods have yet been implemented for UCI commercial fisheries. East side set net fisheries currently harvest significant numbers of Chinook which are apportioned by historical practice to the Kenai late run. Intensive sockeye commercial fisheries are prosecuted in the Kasilof area with sockeye exploitation rates approaching 70-80% in some years. This fishery has a significant potential of overharvesting the Kasilof late-run Chinook stock. However, harvest of late run Kasilof Chinook is not estimated. Escapement has been estimated with mark-recapture studies in recent years but is not estimated or indexed in-season. Existing escapement and harvest data for Kasilof Chinook does not appear to meet the standard identified by the MSC condition or criteria. Meaningful setnet fishery closure windows would provide an effective alternative to protecting Kasilof Chinook escapement in the absence of accurate escapement or stock identification data. However, current practice allows for closure windows to be set aside to maximize yield of Kasilof sockeye.

Condition 36. Develop appropriately reliable estimates or indices of escapement for Susitna sockeye and Kasilof Chinook and incorporate into fishery management practices. [Upper Cook Inlet]

Susitna Sockeye

ADFG has implemented a series of Susitna sockeye escapement studies (weirs, mark-recapture) that indicate Yentna (Bendix) sonar counts are significant underestimates of actual escapement but appear to be an effective index based on significant correlations with juvenile sockeye abundance in sockeye rearing lakes. In addition, Didson sonar technology is being evaluated as an alternative for the old sonar system. It is expected that continuing work will provide a reliable basis for Susitna sockeye enumeration.

We have concerns with the way Department staff is making application of these results to management. For example, sonar systems within the Kenai River utilize Bendix technology as does the system on the Yentna. These systems have a proven track record of indexing escapements well. The fact that mark recapture estimates for Yentna river sockeye suggest an undercount by the (Bendix) sonar is entirely consistent with the performance on other river systems and is not cause for dismissing the need to manage for, and attain, management targets based on sonar counts. And yet, that is precisely the tact being taken by Department managers.

Kasilof Chinook

Kasilof Chinook mark-recapture studies have been conducted in several years but information is not adequate for in-season management purposes.

To date there remains no escapement based management objective for these stocks and no long term monitoring program has been designed or implemented to provide those objectives. Kasilof Chinook remain largely absent from the suite of interrelated UCI salmon management plans, leaving a void of management objectives and direction.

Condition 37. Review stock status of Susitna sockeye and develop an action plan intended to ensure achievement of Susitna sockeye escapement goals. Action plan should provide specific goals and an anticipated timeline for achieving the goals (see condition under Principle 3 for Indicator 3.4.1.2 [Upper Cook Inlet])

The 2008 Board of Fisheries reviewed current stock status information provided by ADFG and designated Susitna sockeye as a stock of yield concern based on a chronic inability to maintain expected yields above the escapement needs. This stock has now failed to reach minimum sustainable escapement goals in 6 of the last 9 years including 2007.

The best available scientific information from recent research indicates that, while sonar counts underestimate actual escapement, they are an accurate index of escapement and an appropriate basis for existing escapement goals as adopted by ADFG. The BOF adopted an action plan that described existing management plans, recent research aimed primarily at evaluating the accuracy of historical escapement estimation and a series of proposed stock assessment and limiting factor research projects. The BOF also clarified that meeting the low end of the Yentna sockeye escapement goal takes precedence over not exceeding the top end of the Kenai and Kasilof escapement goal ranges, but at the same time, provided increased flexibility for the commercial fishery manager to prosecute more aggressive fisheries on Kenai and Kasilof sockeye. These commercial fisheries occur before significant numbers of sockeye reach the Yentna counting station and before Susitna sockeye run strength can be accurately assessed.

The action plan fails to include specific measures for restoring depleted Susitna sockeye populations, goals, or a timeline schedule for restoration as specified in condition 37. Given that current management plans are the same as those that have resulted in a chronic inability to meet minimum escapement goals, we remain concerned whether the current action plan will provide adequate protection to ensure that escapement goals are consistently met. Based on past practice, our fear is that the commercial fishery will continue to be managed to maximize harvest of the strong Kenai and Kasilof stock at the expense of the weaker Susitna stock.

We suggest that a more effective action plan would include:

- 1) mandatory corridor restrictions of drift net fisheries during early-mid July to protect northern district fish;
- 2) exploitation rate or effort limitations on east side set net fisheries to avoid excessive harvest of northern district sockeye which research has shown to be harvested in significant numbers during some years;
- 3) in-season genetic monitoring of sockeye stock composition in the ongoing test fishery to assess Susitna sockeye run strength and timing; and

- 4) continuing annual genetic stock identification studies of the upper Cook Inlet commercial sockeye harvest in order to accurately assess harvest and productivity by stock.

Condition 38. Develop a method for specifically setting an LRP that is comparable to the SET (Sustainable Escapement Threshold) outlined in the Sustainable Escapement Goal Policy (see Condition under Principle 3, Indicator 3.1.1) [Upper Cook Inlet]

Alaska's sustainable salmon policy identifies a Sustainable Escapement Threshold but SET's have not been identified for any stock in Alaska. "Sustainable Escapement Goal Thresholds" have been defined for some Prince William Sound stocks but these are merely the lower end of a yield-based escapement goal range rather than a conservation-based threshold. However, considerable work and attention has gone into the effects of sockeye escapements exceeding escapement goal ranges. Concern for foregone yield from large escapements continues to be a driving force in UCI commercial fishery management. Limit reference points are intended to identify critical low escapement levels below which fishing does not occur. The lack of an effective LRP for the less productive Cook Inlet salmon stocks including Susitna sockeye continues to favor strong-stock management for Kenai and Kasilof sockeye at the risk of significant conservation and sustainability concerns for other stocks harvested in these mixed stock fisheries.

Condition 39. Evaluate appropriate existing age-sex-size information to determine if fisheries are exerting significant selectivity; continue ASL sampling in fisheries and several spawning stocks to continue a database for long-term evaluation of potential fishery selectivity. [Upper Cook Inlet]

Fishery selectivity for different stock components remains a significant concern for Cook Inlet sockeye fisheries. Genetic data for sockeye, coho, and Chinook has repeatedly shown that each Cook Inlet stock is an aggregate of substocks returning to many different watersheds with often different run timings. Recent sockeye telemetry studies in the Susitna and Kenai have highlighted a widespread distribution, tremendous life history diversity and complicated metapopulation structure of these runs which continue to be treated as single aggregate stocks for fishery management purposes. At the same time, a recent ADFG review of statewide sockeye production has found that Kenai and Kasilof sockeye are among the most heavily-fished sockeye runs in the state (Clark et al. 2007, Special Publ. 07-17). At estimated exploitation rates of 70-80% on these stocks, fishery selection for different portions of the run means that some subcomponents are being fished at higher rates which risk long term effects on the substock diversity and productivity. It may well be this effect explains at least part of the apparent decline in productivity of Susitna sockeye which are among the most diverse in the inlet. Upper Cook Inlet fishery management plans include prescribed commercial fishery closure windows designed to provide conservation benefits by distributing escapement throughout the duration of the run, as well as providing a regular supply of fish to in-river fisheries. However, recent management plan changes and current management practice sets aside the fishery closure windows to maximize yield in years of large returns of Kenai or Kasilof sockeye. This is a clear case of fishery yield objectives trumping conservation concerns and appears directly contrary to the precautionary management principles identified in Alaska's Sustainable Salmon Fishery Policy.

We offer these questions and suggestions with the objective of developing a clear and effective path toward continuing certification of the Upper Cook Inlet commercial salmon fishery. The commercial fishery has long been an integral part of the social fabric and economy of Southcentral Alaska. Sustainable salmon fishery management is an objective fundamental to all Alaskans.

Thank you for the opportunity to provide these comments.

SCOMM

156:8

Kenai Peninsula Fishermen's Association

Ensuring the Sustainability of Our Fishery Resources



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276

(907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

February 11, 2009

Cook Inlet Salmon Task Force

Chair Representative Craig Johnson

State Capitol Building, Rm. 126

Juneau, AK 99811

Chairman Johnson:

The Kenai Peninsula Fishermen's Association (KPFA) members have been a voice in the Cook Inlet Community for over fifty years. Primarily a representation group for setnet fishing families, we give a voice to members from the southern reach of Kachemak Bay to the northern realm of the Susitna Flats, Fire Island, Kalgin Island, the Central District west side and the eastern shores of Ninilchik, Cohoe, Kasilof, Kalifornsky, Salamantof, East Forelands and others.

Of the approximately seven hundred twenty-five Cook Inlet Limited Entry permit holders, KPFA members represent the majority, eighty-six percent who are Alaskan residents.

We want to applaud the Committee on undertaking such a voluminous undertaking. Many of us in the fisheries business have taken years of participation to understand the concepts of complex biological terms. It is our desire to see that every Committee Member fully comprehend the difficult job that the Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Fisheries (BOF) addresses in taking on the biological management and allowing opportunity for all south-central resource utilization.

Our organizations goal: "Ensuring the Sustainability of Our Fishery Resources"

What this means is that we subscribe to the principles of *Maximum Sustained Yield* and to the slight variation, *Optimum Sustained Yield*. We do not agree with management that is determined by politics or social pressures. We believe that a healthy resource that returns *High Sustained Yields* is the only positive way to manage surplus resources to achieve the most equitable distribution. Unhealthy production caused by man made or natural

interventions must be identified and rectified, mitigated to bring balance and substantial returns for a given salmon species.

The Legislature and the Administration should make the commitment to fund resource protection and development. Management can only fulfill expectations of the users if it has healthy and predictable returns.

Cook Inlet setnetters have harvested in her waters for over one hundred years. Competition with traps and other efficient users, over the years, is nothing new for our setnet fishery. We consider these to be just new and expanding fisheries. Our fishermen have had to reduce their opportunity to harvest by time, area and gear in order to accommodate these new fisheries. We understand the need to share the resource, however we do not agree with being excluded from the harvest opportunities: we believe that resource users need to work within reasonable expectations, predictable fisheries based on sound science.

The ADF&G is inadequately funded, it is impossible in the present situation to give the public maximum utilization of her resources because we have limited knowledge and do not have the proper management plans in place to increase production. Intensive use by a growing population requires an equally intensive long range plan that all users can expect will give them access to their chosen resource.

The Department has chosen its management of our entire State on the principles of *Sustained Escapement Goals*. This is a far departure from establishing *Biological or Maximum Sustained Yields*. This is a cost saving measure by the Department and does nothing to accomplish *High Sustained Yields*. There is no incentive within the Sports Division and very little in the Commercial Division to improve on the numbers of returning fish stocks. This is the new definition of *Sustained Yield* within our State Fish and Game Managers, simply it is apathy, a lack of incentive and direction to accomplish the best that can be.

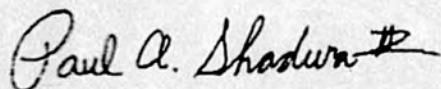
KPFA is looking towards the future. We see the need to expand our knowledge base. We also see the need to increase production to better serve the needs of our residents. Picking the bones from what is left of our resource pleases no one.

If it is necessary for commercial fishermen to manage themselves, they are aware, they have the tools to accomplish this. We believe in real not perceived conservation concerns. State law gives the fishermen the guidance to protect their interests as a separate and significant user group. It is not by any means appropriate to attempt a force out. The result will not change the production problems that currently are the result of inadequate evaluation and protection of the resource.

Forcing commercial fishermen to fish in terminal areas does not improve the success in harvesting, catching or increase production. In-river users will compete with a higher concentration of in-river users. Expectations will be high, actual harvest and catches will be low. We believe that there should be a balance.

In the end, the Task Force should consider that commercial fishermen want not to just catch a fish today; we want to harvest it tomorrow and next year, and the next decade. We have a strong interest in perpetuating strong healthy runs for our families and for your families. We are for the most part all Alaskans, and we all strive for what is best for the future of our State!

With all respects,



Paul A. Shadura II
Executive Director

cc Representative Johansen, Representative Neuman, Representative Stoltze, Representative Doogan, Senator Wagoner, Senator Huggins, Senator McGuire, Senator Wielechowski, Fishery Advisor Cora Crome, Representative Chenault, Representative Seaton, Senator Stevens, Representative Austerman, Representative Olson



United Cook Inlet Drift Association

43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438

ucida@acsalaska.net

January 23, 2009

Dear Legislative Task Force Members,

The purpose of this letter is to respond to a letter to the task force sent through Curt Menard, Mayor of the Matanuska-Susitna Borough dated December 5, 2008.

It is unfortunate that Mayor Menard was misinformed by his advisory panel and as a result he has misinformed the task force as well.

Here are some of the issues that should be clarified or corrected:

Menard states:

"It is apparent to our committee members that the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G) primarily manages the Upper Cook Inlet commercial salmon fishery to attain "Maximum Sustained Yields"(MSY) from the Kenai and Kasilof River sockeye salmon."

This statement is incorrect. Since 1999 the BOF passed the Kenai River Sockeye Salmon Management Plan which changed the MSY sockeye salmon goal to an Optimum Goal. The MSY goal was 500,000 to 800,000 fish while the optimum goal is 500,000 to 1 million sockeye salmon. Therefore, the BOF recognized that MSY goals needed to be altered to meet some of the social needs in UCI. The higher sockeye salmon goals would result in reduced returns to the Kenai River on average.

Menard states:

"Today demographics have changed drastically...certain past management practices are no longer acceptable to the rapidly growing portion of the population."

We believe the state must change from the present practice of pursuing maximum sustained yield for a limited audience, when it deprives others (the great majority) of their constitutional right to an equitable share of that resource. Residents of northern Cook Inlet cannot and will not accept management that primarily emphasizes maximum sustained harvests of Kenai and Kasilof sockeye salmon at the almost total exclusion of other salmon species and stocks.

These statements are very unfortunate and misleading. The residents of the Anchorage and Matanuska-Susitna Basin are the major harvesters of Kenai and Kasilof sockeye

salmon. Combined harvest levels in the personal use and sport fishery approach 400,000 to 500,000 fish and most of this harvest is from residents outside the Kenai Peninsula area.

The sockeye salmon sport harvest in the Susitna River is only about 10,000 fish from a total return of 400,000 to 900,000 entering the system. Additionally, Mat-Su fishermen harvest about 3,000 pink salmon from a total return of 10,000,000 to 20,000,000 annually. Putting more sockeye into the Susitna River above the goals does not benefit any users if the excess escapement results in a reduced sockeye production in Kenai and Kasilof River that is presently used by these same residents.

The claim that ADF&G manages to the almost total exclusion of other salmon species and stocks is not proven with any objective data. Review of emergency orders will show that each year ADF&G writes numerous orders restricting the commercial fisheries to move northern bound stocks into the Susitna and other northern drainages.

Finally, if one reviews the escapements for Kenai and Kasilof sockeye salmon relative to goals one will see they are consistently exceeded which refutes the idea that these stocks are managed to the detriment of other stocks.

Menard states:

"Therefore, we believe...manage Upper Cook Inlet salmon for "Optimum Sustained Human Benefits"

This is a very perplexing statement. The State Constitution notes that resources are to be managed for the maximum benefit of the people. No definition of optimum is provided except for three management objectives. These are:

- A. Management of Susitna and Fish Creek is to meet existing in-season escapement goals. This is presently being done. Escapement goals have been met and exceeded based on new data from the weir counts and mark/recapture estimates.
- B. The development of scientifically based escapement goals for in-season commercial management of coho, pink, and chum salmon is also requested. ADF&G has been working on this technical issue and has not done so, not for political reasons but because of biological and technical limitations. For example, in-season management requires counts to be available in a timely manner. The inability to count salmon in the lower Susitna River makes in-season counting impossible and therefore not useful for in-season management of the fisheries. However, other indicators of abundance – the drift gill net harvest and offshore test boat index – can be used to assess overall run strength coming into Cook Inlet
- C. The final request is for genetic identification program that will provide in-season information on all stocks. Again, there are several significant technical issues that limit any in-season use of these types of data. Even if successful, the cost of such a program is very high relative to other priorities for salmon management. Within the Susitna River drainage there are major threats to production including, but not limited to, northern pike infestations, stream blockages and habitat destruction.

Lastly, Menard states:

We recommend that the Task Force consider the following approaches to meeting conservation goals... again thank you for investigating the sub-standard returns of salmon stocks to Northern Cook Inlet...

The idea that returns to the Northern Cook Inlet are sub-standard is not true for pink, chum, coho, and Chinook salmon. Data on these stocks presented by ADF&G to the BOF has shown that there is no conservation concern for these stocks and that they are healthy. Exploitation rates by the commercial fishery on these stocks are very low and most of the fish are currently reaching their natal streams.

While Susitna sockeye salmon were made a "stock of yield concern" by the BOF, this designation is not a "conservation concern." Yields have decreased in the commercial fishery because of lower production and reduced fishing time. However, lower production is primarily due to issues associated with pike predation, blockages to migration and in-lake production issues. Again, escapement goals have been reached in three of the last three years using the weir counting method widely recognized as the most accurate salmon counting method.

One recommendation that requires further discussion is the concept of a conservation corridor in UCI. First, ADF&G has the authority via emergency order to restrict commercial fishing time by time and area. Therefore, they can use their flexibility to create a conservation corridor at any time if needed.

However, if a conservation corridor as purposed was put in place as proposed, the ability to harvest all salmon stocks in Cook Inlet would be seriously reduced, and the quality of the salmon harvest would decrease. This would cost the citizens of the State millions of dollars for no useful purpose. There are times and areas that the drift gill net fleet must fish in the open waters of UCI for effective management and product quality. To deny this demonstrates a complete lack of understanding of correct fishery management principles as applied to UCI fisheries management.

In summary, it is our opinion that the BOF and ADF&G have listened to the citizens of the State of Alaska, including those from the Northern areas, and have made a series of management plans and management actions that are consistent with the maximum benefit to the citizens of this State, including the Anchorage and Matanuska-Susitna areas. In contrast the letter from Mayor Menard including the recommendations would cause direct harm to these same citizens, including his residents of Anchorage and the Mat-Su.

Sincerely,

Original Signed Document

Roland Maw
UCIDA Executive Director
ams

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Sincerely,

Original Signed Document

Roland Maw
UCIDA Executive Director
ams



MATANUSKA-SUSITNA BOROUGH

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 745-9833 • Fax (907) 745-9876

December 5, 2008

TO: The Joint Legislative Cook Inlet Salmon Task Force

THROUGH: Curt Menard, Mayor
Matanuska-Susitna Borough

FROM: Tom Kluberton, Chair
Matanuska-Susitna Mayor's Blue Ribbon Sportsmen's Committee

SUBJECT: Upper Cook Inlet Salmon Fisheries

We express our appreciation to the Joint Legislative Task Force members for making time in your busy schedules to address the complexities of the Upper Cook Inlet (UCI) Salmon Fishery. We understand the enormity of that challenge, and owe a debt of thanks to you for your participation.

Our goal in writing is to share with you the combined experience of our members, focused by our activities as a committee. We hope our thoughts may assist you in the development and implementation of measures that will ensure improved management of this extremely important fishery.

It is apparent to our committee members that the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G) primarily manages the Upper Cook Inlet commercial salmon fishery to attain "Maximum Sustained Yields" from Kenai and Kasilof River sockeye salmon. Sockeye stocks from these systems have historically been the "big money" fisheries, and (perhaps) in years past, the demographics in south-central Alaska rendered such a management practice generally acceptable.

Today demographics have changed drastically. With 80,000+ residents in the Mat-Su Borough and an Anchorage Bowl population around 300,000, certain past management practices are no longer acceptable to a rapidly growing portion of the population. Another significant factor is the incredible growth of the Tourism Industry. Simply put, the economic impact of non-commercial fishing (sports, personal use, and subsistence) has exploded. Our committee eagerly awaits the results of a study commissioned by ADF&G into the economic impacts of sport fishing in Alaska. We fully expect this study, which is scheduled for release in December, will confirm the mushrooming economic value of sport fishing within the Upper Cook Inlet region.

Since salmon are a common property resource, we believe the state must change from the present practice of pursuing maximum sustained yield for a limited audience, when it deprives others (the great majority) of their constitutional right to an equitable share of that resource. Residents of northern Cook Inlet cannot and will not accept management that primarily emphasizes maximum sustained harvests of Kenai and Kasilof sockeye salmon at the almost total exclusion of other salmon species and stocks. In other words, the passive and coincidental commercial harvest of salmon other than Kenai Peninsula sockeye must be addressed and corrected.

Therefore, we believe that the Legislature should direct the BOF and ADF&G to manage Upper Cook Inlet salmon for "Optimum Sustained Human Benefits" rather than emphasizing economic returns to specific elements (Central District fishers) of the commercial fishery. Movement toward management that features optimum benefits would include, but not be limited to:

- 1) Consistent achievement of existing in-season escapement goals for Susitna River and Fish Creek sockeye;
- 2) Development of scientifically-based escapement goals for in-season commercial management of coho, pink and chum salmon. (in-season commercial goals for these species do not exist)
- 3) Development of a genetic identification program that will ultimately provide a timely, in-season harvest assessment of major stocks.

Managing Cook Inlet salmon as a common property resource given today's demographics and economics requires additional effort and direction from the state. The complexities of managing a mixed-stock fishery are challenging, but tools are available that could make this common property resource more equitably available to all citizens.

We recommend that the Task Force consider the following approaches to meeting conservation goals for all Cook Inlet salmon as well as equitably allocating harvestable surpluses to all users:

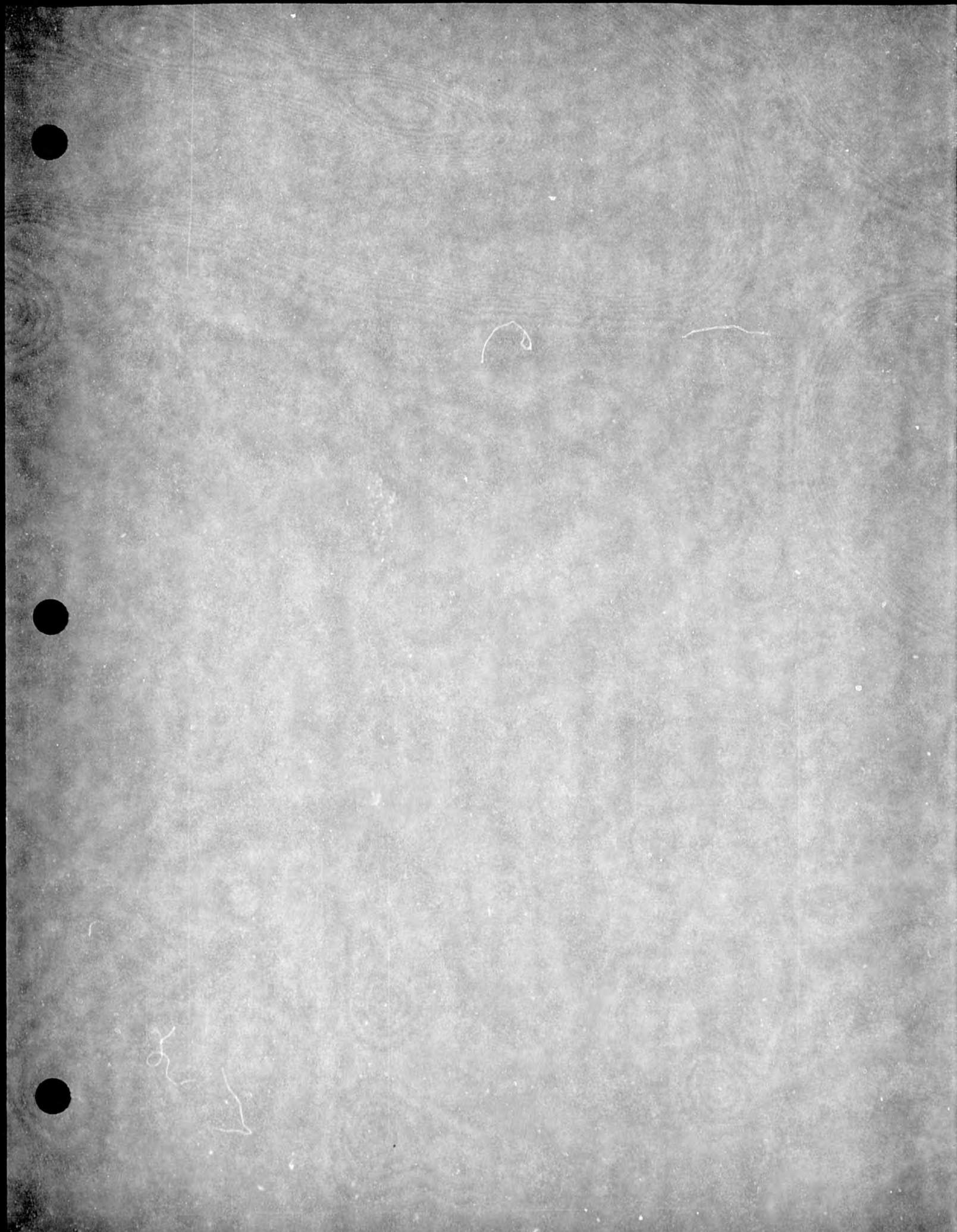
- 1) **Implement a Salmon Conservation Corridor in the Central District of Cook Inlet subject to legislative approval in accordance to AS 16.05.251(1).** A Management Plan establishing harvest guidelines and criteria would be developed by the BOF for the conservation corridor. Plan guidelines may include criteria pertaining to where, when and under what standards or conditions fishing may be allowed (if any) within the corridor. Creation of a conservation zone for Cook Inlet would be a step toward the type of harvest practices currently allowed in Bristol Bay; the world's largest sockeye salmon fishery. In the Bay, fishing is normally only allowed within five districts located near the mouths of natal streams in order to minimize problems inherent with mixed stock fishing. A Cook Inlet conservation zone would also likely serve as a catalyst for speedy development of a genetic program to apportion salmon harvest from marine waters to streams of origin e.g., fishing within the corridor might only be allowed when and where the identities of major harvested stocks are known.
- 2) **We believe it is appropriate for the legislature to provide general guidance/policy to the BOF regarding allocation of fishery resources more in line with Alaska's current economics and demographics.** In 1986, the BOF received legislative direction to "establish criteria for allocation of fishery resources" and a list of seven factors to consider when doing so. Since that time, the BOF has **not established criteria** as legislatively mandated by AS 16.05.251(14)(e). We believe the legislature has appropriately delegated the responsibility to allocate fishery resources to the BOF but follow-through in regard to the 1986 directive must occur.
- 3) **The legislature should consider funding professional socioeconomic expertise for the BOF.** The BOF should develop formal methods of integrating socioeconomic information into their decision-making processes. Allocation decisions seem to be based on (1) objective scientific data from the disciplines of fishery biology and management; and (2) nonobjective socioeconomic information from the public (the Subsistence Division of AD&G does provide some socioeconomic information regarding subsistence fishing). Without objective socio-economic data the present approach to allocation can be described as one of extreme caution tending to maintain the status quo. The BOF is hesitant to evoke regulatory changes that would alter allocations for beneficiaries. Lacking appropriate staff, the BOF has a difficult time objectively evaluating the socioeconomic impacts of their allocation decisions. In contrast, the North Pacific Fishery Management Council, the federal analog to the BOF, has multiple economists on staff.

- 4) **Examine the Limited Entry Act to see if this statute is functioning as intended.** The buy-back provision under the Act raises serious constitutional issues because a fishery such as Cook Inlet may become 'too exclusive' under Article 8 Sec. 15 of the Alaska Constitution. The legislature created the Act to insure adequate remuneration for commercial fisherman and to conserve the fisheries. Under the program, permits were not capped at an optimum number (AS 16.43.290), but rather were set at a legally required maximum. The buy-back program was proposed to reduce the number of permits from maximum to optimum (AS 16.43.310) but this has not occurred anywhere in Alaska (except for a small private voluntary buy-back in southeast.) Instead, salmon fisheries such as Cook Inlet have incurred increased capital costs over the thirty plus years since the Act became law. Over-capitalization, coupled with sagging fish prices, requires fishermen to harvest more aggressively just to make "ends meet". Unhealthy economic situations result in increased pressure on regulators to maximize harvests, which in turn often elevates user group conflicts. We encourage the legislature to re-visit the Limited Entry Act to see if modifications are required to allow the buy-back provision to perform as intended. In order to insure the "well-being of the fisheries and all participants", it may be desirable to broaden the Act to include both commercial and non-commercial users. Perhaps, the "too exclusive/monopoly" issue can be legally accommodated by acknowledging that non-commercial and commercial fishermen target the same common property resources. Foregone harvests from bought-back commercial permits need not automatically become available to active permit holders as the legislature could mandate that some or all of the 'additional' salmon be made available to non-commercial users.
- 5) **Provide adequate funding to insure development of DNA-based genetic stock assessment program for the Inlet's commercial salmon harvest.** Such research must not be limited to sockeye salmon, but should extend to other salmon species and ultimately result in timely in-season stock assessment. Funds should also become available to develop sustainable escapement goals for in-season management of coho, pink and chum salmon. Such in-season commercial management goals, the "cornerstones" of sustainable salmon management, do not exist as was previously noted for northern Cook Inlet stocks.
- 6) **To the extent practicable, codify the Alaska Sustainable Salmon Fisheries Policy in Alaska Statute.**

We would like to make you aware the Matanuska-Susitna Borough, the private sector, and several state, federal, and tribal entities, are working together through the Mat-Su Basin Salmon Habitat Partnership to improve and conserve salmon habitat throughout the Northern Cook Inlet drainages. October's Science & Restoration Symposium conducted by this Partnership drew almost 100 scientists and policy-makers to listen to 27 presenters discuss the salmon-related field work they have underway. The cumulative investment in this work is in the millions of dollars and makes the point clear that the leaders and residents of the Northern Cook Inlet recognize the intrinsic and economic value of the salmon resource.

Again, thank you for investigating the sub-standard returns of salmon stocks to Northern Cook Inlet drainages and for your work towards balancing the management of this sustainable resource that delivers benefits to all users, Alaska's economy and way of life.

If we can be of any assistance to your endeavor, we are eager to help. Please feel free to call upon us.



From: dwimar@gci.net [mailto:dwimar@gci.net]

Sent: Monday, October 27, 2008 9:46 AM

To: Rep. Craig Johnson

Cc: Peter Micciche; Mayor Pat Porter; Mayor Dave Carey; Comm Denby Lloyd; Rep. Paul Seaton; Rep. Kurt Olson; Rep. Mike Chenault; Sen. Tom Wagoner; Cora Crome; Frank Bailey; Governor Sarah Palin (GOV sponsored)

Subject: KAFC Letter to Leg. Task Force on UCI Fisheries

Dear Chairman Johnson,

Please see the attached advanced copy of a letter to the Task Force from our group, Kenai Area Fisherman's Coalition (KAFC). This letter outlines information we would ask the task force members to consider before making any recommendations to the legislature during this upcoming session. We request the members base their decisions on the best scientific information available and stay clear of agendas driven by special interest.

Our group has 10 retired fisheries scientists and managers on our BOD with a thorough understanding of all fisheries studies conducted in UCI over the past 25 years. We represent private resource users and have no commercial interests. We would be glad to assist the Task Force with any additional information or scientific evaluation they may desire.

Please pass this letter on to all Task Force members and keep us informed on Task Force issues as they develop.

Respectfully Submitted,

Dwight Kramer - KAFC Chairman
283-1054



Kenai
Area
Fisherman's
Coalition

PROTECTING YOUR FISHING RIGHTS & RESOURCES

P. O. Box 375 Kenai, Ak. 99611 (907) 283-1054 dwimar@gci.net

Legislative Task Force on Upper Cook Inlet Fisheries

October 27, 2008

C/o Rep. Craig Johnson

716 W. 4th Ave. Ste. 640

Anchorage, Ak. 99501-2133

Dear Chairman Johnson,

The Kenai Area Fisherman's Coalition (KAFC) is an organization composed of scientists and concerned users of the Kenai Peninsula waters. We have 10 fisheries biologists in our organization that provide over 120 years of experience on the Kenai and Upper Cook Inlet (UCI) in both research and management. We also like to consider ourselves a "Joe Fisherman" organization since we have no commercial interest. Our membership is close to 200 members.

We believe that habitat protection should be the primary goal of any resource organization or government agency. We support the concept that user group needs are secondary to habitat protection. We also strongly support salmon escapement goal management. This is the foundation Alaska has developed to maintain salmon resources at sustainable levels.

We have been following the task force progress and feel that our input would be of value to you at this time. As you are now aware, the UCI fisheries are very complex. User groups tend to be selective in their use of information and ADF&G and the Board of Fisheries (BOF) are caught in the middle of the allocation battles.

This has led to distrust and confusion within the public and regulatory agencies. It has also created uncertainty in how stable the various fisheries will be in the future. The creation of the legislative task force did not help this situation. We recommend no major alterations to the present management framework.

We do have some comments for the task force to consider:

1. **UCI complexity is difficult to understand** – The task force was created out of concern for UCI northern salmon stocks and allocation issues in the Mat/Su area.

We attended and participated in the February 2008 BOF meeting and found it to be a fair and reasonable process. Decisions made there did not threaten any resource and balanced the user needs in an appropriate manner.

We would caution that making changes to the BOF process or the way UCI fisheries are managed would be a mistake at this time. As sport and personal use fisherman we are concerned that the task force will focus on the upper Inlet and will lose sight of the ramifications of their actions on the Kenai Peninsula systems where most of South-central fisherman fish.

Escapement goals for Kenai Sockeye and Chinook salmon have been established to provide high sustained yields for the benefit of all user groups. There is compelling evidence that when these goals are exceeded future yields will be reduced. Action taken in the drift gill net fleet to reduce exploitation rates for Northern bound salmon may cause fish managers to exceed Kenai and Kasilof River goals and therefore contribute to smaller returns and less harvestable surplus in the future.

Only about 10,000 Sockeye salmon are harvested by sport fisherman in the Susitna River basin while hundreds of thousands are harvested by personal use and sport fisherman in the Kenai River. Records indicate that of the over 300,000 salmon harvested in the Kenai / Kasilof personal use fisheries about 93% are harvested by folks from the Anchorage and Mat/Su areas. Similar comparisons exist for the additional 150,000 annual Sockeye sport harvest on the Kenai River alone. Please remember this when you make your recommendations. Providing a few thousand more sockeye to the Susitna River may result in the loss of tens of thousands of salmon to Anchorage and Mat/Su sport and personal use fisherman who fish the Kenai River.

Relative to Chinook salmon, you should know by now that severe restrictions on the drift gill net fleet will allow more sockeye salmon headed to the Kenai Peninsula streams to reach the near shore areas of the western Kenai Peninsula. This has two impacts – one it requires more fishing time for the set net fishery which increases the harvest of Kenai River Chinook salmon. Second, the quality of the commercial salmon harvested is decreased as fish have held longer in the fresher waters of UCI.

Thus, there is a significant cost for restricting the drift gill net fleet more than necessary to meet escapement objectives in the Northern District.

2. Data needs to be examined closely – The ADF&G has spent thousands of dollars on studies of Northern bound salmon. The task force should examine that data relative to the objectives of the task force.

For example, ADF&G tagging studies show that most Northern bound salmon are making it into the freshwaters of the region. Exploitation rates on Chum, Coho, Chinook, and Pink salmon by the commercial fisheries are less than 15 percent. Therefore, 85 percent of these stocks are available for sport anglers.

Sockeye salmon are reaching the spawning grounds in numbers far higher than previously thought and escapement objectives are being met and have been met in the past. The Bendix counting system was giving everyone a false impression of actual escapement and therefore a false conclusion that goals were not being met.

The task force needs to decide if major alterations in the present fisheries are required if only 15% more Coho, Chum, Pink, and Chinook salmon (maximum level) are put in the system (this would only be accomplished with a total closure of the commercial fisheries – both set and drift gill net). We maintain that this is not required and that the additional 15% would not be measurable in the sport and personal use fisheries on these stocks.

Relative to Sockeye salmon, our concern in the Northern District is a loss of production due to invasive species and blockage of migration of adult salmon. For example, Shell Lake had over 60,000 spawning fish return in 2007 but in 2008 only a few thousand returned. Why? The parent year for the 2008 was 2003/4 and in those years numerous beaver dams blocked Shell Lake Sockeye salmon from reaching the spawning grounds. A lack of spawning fish means poor future returns. The task force needs to concentrate its recommendations on the real threats to production in the Northern District streams – invasive species, blockage of fish migration, and habitat destruction.

3. What is the real issue - The concern of Mat/Su user groups is that fishing opportunity and catch rates are not meeting their needs.

We examined the sport fish harvest figures for the Northern District and found that the exploitation rates by sport fisherman are very low relative to the stock abundance estimates from ADF&G studies. For example, harvest of Sockeye, Chum, and Pink salmon are very low (less than 10,000 fish in a number of years) and the harvest of Coho is very low relative to the hundreds of thousands of Coho entering the northern streams.

We believe that the issue is access and not fish abundance. A number of systems in the Susitna River are just not available to the average angler. Locations that are available become crowded and have lower success rates. We understand these issues, but putting 15% more fish into these areas will not solve the problem. The task force should concentrate its recommendations on how to improve access into northern district streams.

4. Buy back programs – We would suggest you not pursue this option.

The foundation, as we've stated, for Alaska salmon management is meeting escapement goals. Therefore, as long as these goals are maintained any fishing fleet reduction just means more fishing time for the remaining commercial effort. The end result is the same – no change in harvest per se.

Consequently, if the task force recommends a reduction in the drift fleet to a level that the historical harvest is reduced then the issues identified with Kenai River Sockeye management become more pronounced. We cannot accept this as it would impact thousands of residents of the Peninsula as well as Anchorage and the Mat/Su which rely on high sustained yields from these systems.

While some user groups want to downplay the risk of over-escapement, the data set for the Kenai and Kasilof Rivers is sound. The risk is just too great to put hundreds of thousands of Sockeye into the Kenai River to gain a minor increase in Susitna bound stocks. From a cost/benefit ratio it makes no sense. Hundreds of thousands of sockeye salmon represents millions of dollars to the Kenai Peninsula communities for little or no measurable benefit in the Mat/Su Sockeye salmon fisheries.

5. ADF&G studies in the Susitna River – We believe that ADF&G and the legislature have not been wise in how monies have been spent on research in the Susitna River.

The ADF&G has wasted hundreds of thousands of dollars on mark/recapture studies and went ahead with these studies when our group and others recommended against this approach. We favor weirs on Sockeye salmon streams to count Sockeye salmon. We also favor a beaver control program to reduce dams which block access to spawning areas; pike control programs, restoration programs for treated lakes, and strict habitat protection regulations.

Unfortunately, the legislature has continued to fund studies with little management benefit. The most recent is the studies proposed by ADF&G on Coho and Chum salmon. We would strongly recommend that these monies be redirected to more useful research/management actions in the Susitna basin. In fact, in a recent letter from the BOF chairman Jensen to Governor Palin (October 14, 2008) he stated "... the legislature's choice of the coho and chum salmon studies was not the fault, nor even the preference, of the department".

As a sport fishing group we have at times appeared to be in conflict with what on the surface appears to be a benefit to sport fisherman. However, we understand from our experience and advice of the professional members of our group that the commercial fleet is a necessary component to maintain escapement goal management for all systems. We would caution the task force to keep this in mind when discussing your recommendations.

On a positive note, we would recommend that the task force examine future funding for the BOF. Our experience is that the BOF needs its own scientific staff to help them digest and understand the volumes of material they receive. The ADF&G is not capable because of reduced staffing and increasing work loads on their personnel.

We would like to thank the task force for taking these issues seriously and hope that your recommendations are well thought out and researched.

Dwight Kramer, KAFC Chairman

Cc: Governor Sarah Palin
Frank Bailey, Board and Commissions
Cora Crome, Office of the Governor
Sen. Tom Wagoner
Rep. Mike Chenault
Rep. Kurt Olson
Rep. Paul Seaton
Denby Lloyd, Commissioner of ADF&G
Mayor Dave Carey, Kenai Pen. Borough
Mayor Pat Porter, City of Kenai
Mayor Peter Micciche, City of Soldotna