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TO: Alaska Department of Fish and Game - Boards Support Section

ATTENTION: BOF COMMENTS

I **OPPOSE** Proposal 239-5 AAC 67.022(g)(6) only unbaited, single-hook, artificial lures may be used May 1 through July 31.

I have operated a sport fishing camp on the Nushagak River for the last 12 years. This river has been a well managed king salmon fishery and continues to produce the largest king salmon run in the world. That is due largely to the (NMKSMP) Nushagak-Mulchatna King Salmon Management Plan 5 AAC 06.361. Through that plan the ADF&G already has the ability to restrict bait and has used that restriction the past two seasons and many times throughout the history of the NMKSMP.

The sport fishing industry needs the opportunity to catch king salmon. In high murky water without bait, that opportunity is lost. The Nushagak King Salmon allocation is clearly outlined in the NMKSMP. The restriction of bait should not be used as an allocation issue. Additionally this is not a conservation issue as the AKDF&G has the tools needed for conservation as outlined in the NMKSMP.

The catch and release mortality rate was already factored into the allocation for sport fishing when the Nushagak-Mulchatna King Salmon Management Plan was negotiated between sport fishermen and commercial fishermen.

The Nushagak is a pulse fishery. The kings come in waves. A large escapement one day can be followed by low escapement the following few days. The catch per fisherman drops off significantly on the down days. Eliminating bait would dramatically effect an angler's ability to catch king salmon on the low volume days. Eliminating bait would also affect all the local Dillingham anglers who fish the Nushagak. Many times due to work, locals have a limited day of two to catch king salmon. On days of low escapement their opportunity to harvest king salmon is restricted without bait.

There are stories from the local fishing magazine, FISH ALASKA, about anglers catching upwards of 100 kings per day. That number is greatly exaggerated. High catch rates are associated with a very large daily escapement.

The mortality rate associated with catch and release King Salmon fishing is less that the dropout rate in the commercial fishery when using sockeye gear. The kings get tangled in the gear and drown and when the net is being retrieved the net straightens out and the kings go to the bottom of the bay.

I would be in favor of eliminating treble hooks and double hook sets as a compromise.

Again I would like to reiterate the fact that the Nushagak-Mulchatna King Salmon Management Plan used by the ADF&G provides all the tools necessary for managing that fishery with regards to catch and release, mortality rates, escapement, bait restriction and allocation issues.