

RC9



September 25, 2012

Chair Karl Johnstone  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO BOX 115562  
Juneau, AK 99811 – 5526

Dear Chair Johnstone:

Kenai River Sportfishing Association (KRSA) strongly recommends that the Alaska Board of Fisheries (BOF) accept the following three Agenda Change Requests (ACRs) each of which address the record low abundance of late-run Kenai River king salmon and the unforeseen and unexpected consequences resulting from management of Upper Cook Inlet (UCI) salmon fisheries.

- ACR #4 submitted by KRSA;
- ACR #14 submitted by Brent Johnson; and
- ACR # 17 submitted by the Alaska Department of Fish and Game (ADFG).

Discussion: Record low abundance of late-run king salmon of Kenai River origin combined with changes in the manner used by ADFG to estimate abundance of late-run king salmon have rendered 5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan inoperative and obsolete. The existing plan no longer assures the long term sustainability of the stock nor does the current language of the plan provide for the orderly conduct of traditional fisheries. The management plan only covers the time period July 1-July 31 while in 2012 35 percent of the total run returned after July 31. The 2012 return of late-run of king salmon in the Kenai River will likely be the smallest on record achieving the minimum goal of 17,800 spawning fish only by virtue of almost total closure of the sport, personal use and set net fisheries that traditionally harvest these fish.

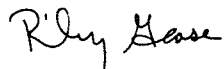
The low return realized in 2012 falls on the heels of other low returns observed in 2009 – 2011. Application of the same technology used by ADFG to estimate abundance in 2012 to the 2009-2011 data leads to the conclusion that minimum escapement levels were likely not achieved during any of those years. This is NEW INFORMATION and, if correct, this important stock of fish is in a dangerous state of decline and must receive additional protection. Alaska's Policy for Management of Sustainable Salmon Fisheries mandates wild salmon stocks be maintained at levels of resource productivity that assure sustained yield. Late-run Kenai River king salmon are

an incredibly important stock of fish. Because of the complex and interrelated nature of the mixed stock fisheries of UCI and the potential allocative nature of any change in management this issue is most appropriately addressed by the BOF.

KRSA seeks the following general outcomes should the BOF accept these ACR's:

- The management plan governing the fisheries for late-run Kenai River king salmon should be amended in such a manner that the unprecedented low abundance of late-run king salmon is fully acknowledged. The sustained yield of this vitally important stock of fish should be maintained at acceptably healthy levels to support the fisheries dependent upon late-run Kenai River king salmon. To accomplish this outcome escapement objectives must be defined in terms of the current assessment tools and must be achieved. To provide for the sustain yield it is critical that the management plan fully cover the time period encompassing the length of the run not just July 1-July 31.
- The burden of conservation must more equitably shared between the sport, personal-use and commercial set net fisheries particularly when restrictions are implemented, yields are estimated to be low or when achievement of the escapement objective is in doubt. Specifically, ADFG needs tools to step up and down the fishing power of the east side set net fishery in an effort to minimize the incidental harvest of late-run kings in that fishery and pair these tools with the ones currently used in the sport fishery. The on/off switch strategy for the set net fishery now practiced is no longer constructive for fish or users. Total closure of the sport, personal use and set net fisheries must be the tool of last resort but KRSA questions whether all fishing opportunity should be lost due to late run timing or when only unknown or de minimis savings of fish will likely be realized.

Respectfully,



Ricky Gease, Executive Director  
Kenai River Sportfishing Association

**The Seward Fish & Game Advisory Committee. strongly urges the Alaska Board of Fish to consider and act upon the following Agenda Change Requests**

**ACR #4 submitted by Kenai River Sportfishing Association**

**ACR #14 submitted by Brent Johnson**

**ACR # 17 submitted by the Alaska Department of Fish and Game.**

**Each of these ACRs pertains to the continuing decline of late run king salmon stocks in Upper Cook Inlet.**

**5 AAC 21.359, the Kenai River Late-Run King Salmon Management Plan, is inoperative and obsolete. This plan was adopted in a time of high resource abundance. The Seward AC believes that continuing to manage at that level of abundance when the stocks are at historic lows does not provide adequate protection for these stocks, is bad policy, and is in conflict with Alaska's Policy for Management of Sustainable Salmon Fisheries.**

**The Seward Fish & Game Advisory Committee urges the BOF to act on these proposals.**



RC 11

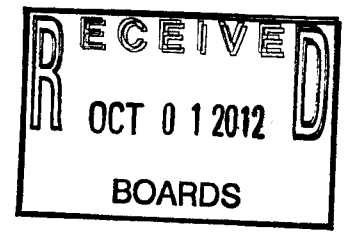
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September 25, 2012

Board Support Section  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811-5526  
Via fax to: (907) 465-6094



**REGARDING: Kawerak Comments regarding Stocks of Concern**

Dear Board Support Staff:

In regards to the Alaska BOF work session October 9-11, 2012 regarding the topic of "stocks of concern", Kawerak submits these comments. Recent changes in Alaska Department of Fish and Game (ADFG) salmon management policies impact decisions to list various rivers' salmon species as "stocks of concern":

- 1) ADFG staff have lowered escapement goals for rivers that are not meeting escapement goals; and
- 2) ADFG propose to combine escapement goals for multiple rivers which results in masking rivers that are not meeting escapement goals.

Kawerak opposes both decisions and offer the following comments.

Salmon are a crucial resource for people in this region and the loss of salmon stocks in any of our rivers is unacceptable. If a river is not meeting escapement goals, we request a management policy be implemented in which ADFG addresses and identifies the cause of the declining salmon run.

Reducing escapement goals will not address the underlying problems that are affecting fish stocks in this region. As a clear example, none of the rivers which have Chinook runs in the Norton Sound Region met Chinook escapement goals even those rivers that have historically had high numbers of returns. There is a clear need for action to save our Chinook stocks.

We oppose the decision to combine Chinook escapement goals for the Kwiniuk and Tubutuluk Rivers, as a combined escapement goal masks the declining Chinook runs in the Kwiniuk River.

We oppose the proposal to lower the Chinook escapement goal in the Boston River.

We oppose the current management decision in which the escapement goal for chum in Nome sub-district (Snake, Nome, Eldorado, and Flambeau Rivers) is considered as being a single stock. This masks the declining run in the Nome River. Not only has the policy of having a sub-district wide goal masked the poor returns to the western streams it has driven them into a greater deficit by repeatedly missing the goals. The 1978 tagging study showed that the chum in the sub-district have two directions of migration diverging at Cape Nome. A chum spawning in the Eldorado is programmed to travel east of Cape Nome and would be far likelier to stray to streams east of the Eldorado, and would be very unlikely to repopulate either the Nome or Snake River. This management strategy of the past decade is failing.

We prefer single river escapement goals, however if ADFG intends to combine escapement goals for rivers in the Nome sub-district, then we suggest the following. Combine Eldorado and Flambeau chum escapement (East of Cape Nome) as one goal and perhaps use Eldorado as the index river. Secondly combine Nome and Snake chum escapement (West of Cape Nome). This would better reflect the stock composition of chum returns to Nome sub-district.


We request ADFG take appropriate steps to address the declining runs of chum and Chinook salmon in our region, as it is ADFG's responsibility to sustain and preserve salmon stocks.

The point for having escapement goals is to indicate when there is a need for management action. Recent un-met escapement goals in many of our rivers for chum and Chinook indicates that this region needs management action to stop the decline of salmon stocks.

Lowering escapement goals, as has been the recent practice, could result in stocks declining to a critical point, and potentially being lost forever. We request the State institute and fund a current management regulation in which Sustainable Escapement Thresholds are identified for our rivers.

If you have questions or comments, please contact Roy Ashenfelter at 443-4384 or email [nr.advoc@kawerak.org](mailto:nr.advoc@kawerak.org).

Sincerely,  
KAWERAK, INC.

  
Melanie Bahnke  
President

CC: Jim Menard  
Scott Kent

RC12

**BERING SEA/ALEUTIAN ISLANDS  
CRAB OBSERVER OVERSIGHT TASK FORCE**

October 4, 2012

Honorable Karl Johnstone, Chair  
Ms. Monica Wellard, Executive Director  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, Alaska 99811-5526


Sent by Fax: 907-465-6094

Dear Chairman Johnstone & Ms. Wellard:

The Alaska Board of Fisheries initially created the Bering Sea/Aleutian Islands Crab Observer Oversight Task Force in 1999. The Board provided for the appointment of 15 industry members. During the March 26, 2011 work session, the Board agreed to continue with the Task Force and appointed 9 members. This leaves several vacancies the Board may wish to fill if suitable candidates emerge.

Mark Gleason was hired as the Executive Director of the Alaska Bering Sea Crabbers in October 2011. Alaska Bering Sea Crabbers represent nearly 70% of the harvest quota share-holders ("QS holders") in the Bering Sea Rationalized Crab fisheries. Mr. Gleason has expressed an interest in being appointed to the Task Force, based on the constituency he represents. We agree that his appointment to the Task Force is justified and would respectfully request that Mr. Gleason be appointed to the Task Force during the October 9-10, 2012 Work Session. We are available to answer any questions regarding our request. Thank you for your consideration of this matter.

Sincerely,

  
Mr. Jeff Stephan, Co-Chair  
Crab Observer Oversight Task Force

  
Mr. Arni Thomson, Co-Chair  
Crab Observer Oversight Task Force

cc: Commissioner Cora Campbell