

Bare Threads

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Petition to the Alaska Board of Fisheries

We are petitioning the Alaska Board of Fisheries to implement the 5 AAC 39.220 Policy for the management of mixed stock salmon fisheries at their upcoming UCI Board meeting to conserve the remaining Early-run king stocks to the Kenai River which are being overharvested in the mixed stock Late-run Kenai River king fishery in-river. Until the recently released (last week) McKinley report on the in-river genetics the public was unaware that the Early-run prior to July 1st contained up to 40 percent Late-run spawners. In addition during the fishery in July Early-run tributary stocks are being harvested during the mixed stock Late-run fishery and in fact are even subtracted from the Late-run escapement not the early-run escapement as they should have been. This overharvest continues into the coho fishery in August and September as C&R mortality which is not even accounted for in any form. All of this means that the Early-run escapements are really much lower than what is being reported by the department even after the significant drop from the old counter to the DIDSON counter which lowered escapements by orders of magnitude. We are asking that the expansion of the guided and un-guided fishery which has occurred over the last 40 years be restricted, using section D below, to 2 days per week in both the early and late-run fisheries unless the department can accurately predict that the goal will be achieved even with this additional harvest. In addition the goals are in error by huge amounts and the department should be instructed to go back and use the **best science** as required in 5 AAC 39.222 to accurately assess both of these escapement goals. This can surely be accomplished before the start of the fishery in June. This is an emergency created by the delay in reports, errors in counting, previously held facts being proven untrue and other failures of the department to implement the best science when they created these goals. To now find that the Late-run is much stronger than shown as late as last year and that the early-run may be even weaker than the 500 percent reduction in escapements is alarming, compromising the sustained yield and possibly the sustainability of the Early-run and the total elimination of some Early-run stocks such Slikok Creek. This is truly an emergency in every sense of the word!

5 AAC 39.220. Policy for the management of mixed stock salmon fisheries

- (a) In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority. Allocation of salmon resources under this policy will be consistent with the subsistence preference in AS 16.05.258, and the allocation criteria set out in 5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007.
- (b) In the absence of a regulatory management plan that otherwise allocates or restricts harvest, and when it is necessary to restrict fisheries on stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern. The board recognized that precise sharing of conservation among fisheries is dependent on the amount of stock-specific information available.

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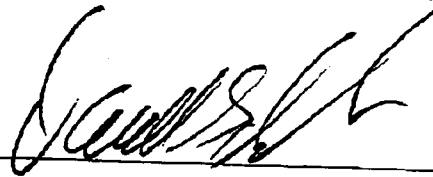
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(c) The board's preference in assigning conservation burdens in mixed stock fisheries is through the application of specific fishery management plans set out in the regulations. A management plan incorporates conservation burden and allocation of harvest opportunity.

(d) Most wild Alaska salmon stocks are fully allocated to fisheries capable of harvesting available surpluses. Consequently, the board will restrict new or expanding mixed stock fisheries unless otherwise provided for by management plans or by application of the board's allocation criteria. Natural fluctuations in the abundance of stocks harvested in a fishery will not be the single factor that identifies a fishery as expanding or new.

(e) This policy will be implemented only by the board through regulations adopted (1) during its regular meeting cycle; or (2) through procedures established in the Joint Board's Petition Policy (5 AAC 96.625), Subsistence Petition Policy (5 AAC 96.625(f)), Policy for Changing Board Agenda (5 AAC 39.999), or Subsistence Proposal Policy (5 AAC 96.615).

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