

To: Alaska Dept. of Fish & Game Commissioner Sam Cotten
Alaska Board of Fisheries Chairman John Jensen

From: Tyonek Fish & Game Advisory Committee
Chair Alex Pfoff
PO Box 82087
Tyonek, AK 99682

Date: 4-20-2018

Subject: Emergency Petition on Emergency Order 2S-01-18

The Tyonek Fish and Game Advisory committee would like to submit an emergency petition for a change to emergency order 2S-01-18. The committee held a meeting and voted unanimously 7-0 to submit this petition on 4/23/2018.

Justification of emergency situation- EO 2S-01-18 was issued just months before fishing begins, blindsiding Northern District set netters. Commercial fisherman were not aware that closure was being discussed, yet sports fish representatives were present during these talks were able to present their case. We feel it was unfair that we were not given opportunity to voice our concerns, while sport fish representatives were able to negotiate catch and release on the Deshka and Yetna, instead of total closure.

It is our belief that this EO 2S-01-18 alongside sport fishing emergency order 2-KS-2-10-18 is a misallocation of the Chinook resource. The regulations currently pair the open status of commercial fishing in the Northern District with the status of sport fishing on the Deshka. 5 AAC 21.366 (10)" if the Deshka River is closed to sport fishing, the commissioner shall close, by emergency order, the commercial king salmon fishery throughout the Northern District..." It is our belief that sports fisherman are given unjust advantage here, in that they are allowed to fish catch and release on the Deshka, while commercial fishing is completely shut down. In the event that the surveys on the Deshka show a situation of underforecast, sports fisherman have the likelihood of being reopened for harvest, while any liberalization to the commercial fishery would be too late and not allow us any access to the resource.

We feel that the best course of action for management of Chinook salmon for 2018 involves monitoring the earliest indicators of run strength. Closing the commercial fishery eliminates the strongest source of in-season data, data which is only made available by providing this small and biologically allowable harvest. In the past decades, sport fishing participation and harvest has continued to increase, while the commercial fishery has been on a steady decline. The total harvest of Chinook salmon in the Northern District directed fishery is minimal, between 1000-2000 fish. Harvest numbers from these openers could provide valuable early indicators for the best course of action for all associated fisheries. If the commercial fishery was reopened, harvest would be conservative, and further information could be

given on the health of the run and the accuracy of the forecasts. This data can then be made to manage the resource fairly for all user groups.

Historical data is also available on success rate of the Tyonek subsistence fishery, and if this data is monitored closely during 2018, action can be taken based on better information than just the current forecast.

According to the ADF&G website, "Most of the harvest of Susitna River Chinook salmon is by the inriver sport fishery. A directed set-gillnet commercial fishery occurs off the mouth of the Susitna River, and the Tyonek subsistence fishery occurs in marine waters about 20 miles from the mouth of the Susitna River. The contribution of the Susitna River stock to these fisheries has never been estimated, but the total harvests of both these fisheries are relatively small compared to the sport harvest and escapement data."

We do not believe that the strength of the forecasts is adequate, and certainly not strong enough to justify eliminating Northern District commercial fisherman's opportunity at the resource entirely.

We would like to point out as an example, the situation in the Copper Basin last year. In response to an inaccurate Chinook forecast, the agency closed and/or severely limited all user groups to king harvest. Fortunately, early commercial catches came in much stronger than expected, serving as the first indicator that the forecast was way off. The Department was able to make necessary changes in time for better allocation.

In summation, we believe that it is in all user groups best interest for the department to take an active role in monitoring the earliest indicators of run strength to determine how best to allocate the resource. We feel this is best done through studying subsistence success versus historical data if feasible, as well as close study of the commercial fishery. If this information indicates that stocks are in danger of not reaching sustainable goals, the Northern District directed king salmon commercial set gillnet fishery, as well as all sport fishing on the Deshka should be closed completely.

We strongly encourage the Commissioner and the Board of Fish to take seriously our request to reexamine the opinions of the biologists who specialize in our fishery, and reconsider the actions of emergency order 2S-01-18.

**UPPER COOK INLET COMMERCIAL FISHING ANNOUNCEMENT No. 2
EMERGENCY ORDER NUMBER 2S-02-18**

Upper Cook Inlet Commercial Fishing Announcement No.2 reopens the Northern District directed king salmon commercial set gillnet fishery for the regularly scheduled fishing periods on Mondays, May 28, June 4, June 11, and June 18, 2018.