

**Board of Fisheries January 11 – 14, 2011 Kodiak meeting at the Harbor Convention
Center in Kodiak, Alaska
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RECEIVED
DEC 29 2010
BOARDS

Peter S. Danelski
620 Rezanof Dr. E
Kodiak, AK 99615

December 28, 2010

Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Dear Alaska Board of Fisheries Member:

I support Proposition 71 – 5 AAC 18.331, allowing a Kodiak dual setnet permit holder to fish both permits.

Kodiak setnetting is unique, in that the season can last more than 100 days. It has also traditionally been a family pursuit and many permits were issued to family operations even at the beginning of limited entry.

Fishing multiple permits makes sense in Kodiak from many perspectives. It is more efficient economically and more environmentally sound. There is less fuel used and supplies expended per unit of gear fished. It also makes it possible to attract safe, skilled crewmembers as sieners can, and makes it a viable career as opposed to a part-time pursuit.

When my wife and I, and our children gear up to start fishing in May, we plan to stay at it until the end of September. Some years that may mean both of us have to stay on-site for as long as 110 days straight. Getting children to the doctor or even to school once they are older becomes difficult. Our neighbors even home-school their kids to keep the nets in the water, and another neighbor sends their son in to town on his own for the start of school.

The salmon season and additional setup lasts half the year and is our major source of income. We pay for minimal health insurance individually and work when we can in the off-season. My wife has started teaching classes at the community college, which requires that she leave the site early, as there is usually still a month of fishing days when classes start. With her permit in my name she could potentially pursue a full-time teaching position with health-care benefits that would take a great deal of stress off our family. We could pull half our nets, when one of us must leave, but the lost income benefits nobody. Hired crewmen, the processor, and our family lose.

Fishing dual permits is more economically feasible, more environmentally sound, safer (easier to get skilled crew), and more profitable. It has always been common and multi-permit family setnet sites are the norm, and will continue to be. Continually transferring permits between family members has been common and creates unnecessary work for the

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December 28, 2010

Alaska Department Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Chairman and Members of the Alaska State Board of Fish:

We are writing to inform you of our support for Proposal 71-5AAC 18.331 Gillnet specifications and operations. We are a family set gillnet operation, that have been active fishers in the Alitak district for twenty one years. We own five permits, and are the only operation that own sites in all three statistical areas in the Alitak District: Olga, Moser, and Alitak bays. Over the last three years we have utilized the dual permit stacking option twice, once for child birth, and once for complications from heart surgery. Both times we found it to be extremely valuable in maintaining our operation and lively hood.

As a case in point during the 2005 season one of our permit holders had an accident with a pressure washer and sustained serious injury while working the fishery, as a result we were unable to use the permit until he was able to return, this was a serious blow to our gross income for that year. If this rule had been in effect at the time we would have been able to transfer the permit and maintain our operation.

It has been our observation that many permit holders within the Alitak District have used and benefited from the dual permit stacking option since its implementation. We have not observed any negative effect on the fishery as a result of this rule. We support Proposal 71-5AAC 18.331 Gillnet specification and operations. We urge you, the board to take action and make this proposal permanent. We appreciate your time and consideration of our point of view.

Sincerely,

Trap Point Fisheries

Permit Holders:

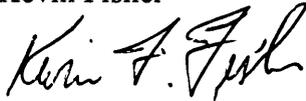
Edwin Fisher



Judy Fisher



Kevin Fisher



Jason Watt



Corina Watt



ALASKA DEPARTMENT OF FISH & GAME



**KARLUK RIVER KING SALMON
ACTION PLAN**

January 11, 2011

KARLUK RIVER KING SALMON STOCK STATUS AND ACTION PLAN, 2011

INTRODUCTION

SYNOPSIS

In October of 2010, the Alaska Department of Fish and Game (department) recommended that the Board of Fisheries (board) declare Karluk River king salmon as a stock of management concern at the regulatory board meeting for the Kodiak management Area (KMA) in January of 2011¹. This recommendation was based on guidelines established in the *Policy for Management of Sustainable Salmon Fisheries* (SSFP; 5 AAC 39.222). The SSFP states that “management concern means a concern arising from a chronic inability, despite use of specific management measures, to maintain escapements for a salmon stock within the bounds of the SEG, BEG, OEG, or other specific management objectives for the fishery...”. Chronic inability is further defined in the SSFP as “...the continuing or anticipated inability to meet escapement thresholds over a four to five year period...” based on the generation time of most salmon species. Despite specific management measures taken by the department to reduce harvest in the sport, commercial, and subsistence fisheries since 2001, the Karluk River king salmon stock has continued to decline since 1999, and failed to make the escapement goal from 2007 through 2010.

This action plan summarizes historical assessment of annual run size and describes the existing regulations and emergency order (EO) authority that the department follows to manage Karluk River king salmon. Options are then presented for potential management actions for the commercial, sport, and subsistence fisheries, and research projects for the Karluk River king salmon stock.

STOCK ASSESSMENT AND ESCAPEMENT GOAL HISTORY

The divisions of Commercial Fisheries and Sport Fish have operated a weir to assess salmon escapement to the Karluk River since 1976 (Figure 1). Escapement of Karluk River king salmon since 1976 has ranged from 752 to 13,742 fish (Table 1). During the 10 years from 1997–2006, escapements averaged 7,278 king salmon. After 2006, there appeared to be a substantial decline in productivity, as measured both by total harvest and escapement. From 2007 through 2010, escapements decreased to an average of 1,668 fish. The decline in escapement was not due to increased harvests (sport, subsistence, and commercial combined), which also declined from an average of 2,383 (1997–2006) to 134 (2007–2010).

For each of the last four years (2007 thru 2010), Karluk River king salmon escapement has been below the current biological escapement goal (BEG) of 3,600–7,300 fish (Figure 2). During this period, escapements ranged from 752 fish in 2008 to 2,916 fish in 2010 (Table 1). This BEG has been in place since 2002, when it replaced the original BEG of 4,500–8,000 fish established in 1978. The current goal will change to a BEG of 3,000 to 6,000 fish in 2011, based on the recent review by an interdivisional escapement goal review team (Nemeth et al. 2010).

¹ Unpublished memorandum from J. Hilsinger and C. Swanton, ADF&G, to Board of Fisheries, September 30, 2010.

HABITAT

Karluk drainage is located within land owned by Koniag Inc., Karluk Tribal Council, and other private parcels, and the Kodiak National Wildlife Refuge. The habitat is considered pristine with no habitat-related concerns identified for Karluk River king salmon.

HARVEST MANAGEMENT

Karluk River king salmon are harvested by a commercial fishery in salt water, and by subsistence and sport fisheries in fresh water and in the lagoon at the mouth of the river. Estimated mean annual sport harvest of king salmon from 1997 to 2006 was 1,141 fish. In 2007, 205 king salmon were harvested in the sport fishery. No king salmon were harvested by the sport fishery from 2008 through 2010. The Division of Sport Fish began taking inseason management actions to conserve Karluk River king salmon in 2001, and has used the commissioner's EO authority to implement inseason bag limit restrictions, nonretention regulations, and/or total fishery closures annually (with the exception of 2004) from 2001 through 2010. Preseason actions were implemented beginning in 2007 with a reduction in bag limit from two king salmon per day 20 inches or greater in length to one per day 20 inches or greater in length. In 2008, the king salmon fishery was restricted to nonretention preseason and then closed by EO June 30, and total sport fish closures were implemented preseason in 2009 and 2010 (Figure 3).

The commercial seine fishery located in the Inner Karluk and Outer Karluk sections targets sockeye salmon returning to Karluk Lake, but Karluk River king salmon are also harvested. The annual commercial harvest of king salmon has declined significantly since 2004 (Table 1). From 1997 to 2006, the mean annual commercial harvest was 1,214 fish. From 2007 to 2010, the annual mean harvest decreased to 82 fish. No commercial harvest of king salmon occurred in these sections from 2009 through 2010 because the sockeye salmon fishery was closed during times that king salmon would normally be present (Figure 4).

The dual-managed state/federal subsistence fishery on Karluk River king salmon occurs in Karluk Lagoon and Karluk River. A state permit is required to participate in both the state and federal subsistence fishery. Estimated mean annual subsistence harvest from 1997 to 2006, as reported by permit returns, was 28 fish and ranged from a low of 0 fish in several years to 165 fish in 2002 (Table 1). Restrictions to the state and federal subsistence fisheries to conserve king salmon escapements have included a prohibition on retention of all king salmon caught inriver during 2008, and complete closure of the Karluk River drainage to subsistence harvest of king salmon in 2009 and 2010 (Figure 4).

Return per spawner of Karluk River king salmon is somewhat cyclical, averaging 1.22 for brood years 1976–2002 (Figure 5). For the 13 most recent complete brood years (1990–2002), only three (1992, 1994, and 1998) have replaced themselves (i.e., return per spawner ≥ 1.0). For brood years from 1976 through 2002, the age composition of the returns was approximately 2% age-3, 11% age-4, 29 % age-5, 52% age-6, and 6% age-7 fish. It is unlikely brood years 2003 and 2004 will produce returns that replace themselves.

ACTION PLAN FOR ADDRESSING STOCK OF CONCERN

COMMERCIAL FISHERIES MANAGEMENT ACTIONS

Past Management Actions

Although there are no commercial fisheries management plans for king salmon in the KMA, fisheries managers have responded to the recent declines with inseason management actions designed to reduce harvests when king salmon runs were low. In 2005, the board adopted a commercial fishery regulation that directs the department to mandate nonretention of king salmon over 28 inches in the commercial fishery within the Inner and Outer Karluk sections if king salmon runs were weak (5 AAC 18.395). While the department does not specifically manage the commercial harvest of king salmon, this regulation was put into effect during the 2005 through 2008 seasons. Inner and Outer Karluk sections were then closed to commercial salmon fishing during the king salmon run in 2009 and 2010 (Figure 4) due to low sockeye salmon runs. All of these actions were effective in reducing harvests from pre-2005 levels, both in absolute numbers and relative to escapement (Figure 6).

5 AAC 18.362(e) *Westside Kodiak Salmon Management Plan* describes the management priorities for managing commercial sockeye salmon fisheries in the Inner and Outer Karluk sections.

Potential Management Actions

Action#1

Status quo. Maintain regulations as currently specified in 5 AAC 18.362. *Westside Kodiak Salmon Management Plan* and 5 AAC 18.395. *Retention of king salmon taken in a commercial fishery*. The westside management plan regulates commercial seine and setnet fisheries on the westside of the KMA (including the Inner and Outer Karluk sections and 5 AAC 18.395 prohibits retention of king salmon over 28 inches in length taken in commercial fisheries by emergency order in the Inner and Outer Karluk sections and the Inner and Outer Ayakulik sections.

Specific Actions:

When king salmon runs to the Karluk system are weak, the department would continue to use emergency order authority to invoke and enforce nonretention of king salmon greater than 28 inches in length in Inner and Outer Karluk sections of the Southwest Kodiak District.

Background:

King salmon harvests in the KMA commercial fisheries are incidental. Currently, there are no management plans directing the department with regard to king salmon management. However, the department does have EO authority to limit the harvest of king salmon by requiring the release of king salmon over 28 inches in length within the Inner and Outer Karluk sections and the Inner and Outer Ayakulik sections. The department has invoked and enforced this provision when it became apparent the king salmon runs were weak (Figure 4).

Benefits:

The current plan allows the department to effectively manage the sockeye salmon run to Karluk Lake while releasing king salmon in years of weak king salmon runs.

Detriments:

While largely unknown, current regulations and management actions may not be sufficient to protect king salmon runs to the Karluk system.

Action#2

Maintain regulations as currently specified in the 5 AAC 18.362. *Westside Kodiak Salmon Management Plan*; and 5 AAC 18.395. *Retention of king salmon taken in a commercial fishery*. In addition require nonretention of king salmon in sections adjacent to the Inner and Outer Karluk sections, including sections of the Northwest Kodiak District and Southwest Kodiak District for seine gear only (Figure 1) by regulation.

Specific Action:

Take board action to expand area referenced in 5 AAC 18.395. When king salmon runs to the Karluk system are weak, the department would enforce nonretention in all sections of the Northwest Kodiak District and Southwest Kodiak District for seine gear only.

Background:

King salmon harvests in the KMA commercial fisheries are incidental. Currently there are no management plans directing the department with regard to king salmon management. However, the department does have EO authority to limit the harvest of king salmon by requiring the release of king salmon over 28 inches in length within the Inner and Outer Karluk sections and the Inner and Outer Ayakulik sections. The department has enforced this provision when it became apparent king salmon runs were weak.

Benefits:

The department does not have a stock separation plan for king salmon on the westside. However, assuming some Karluk River king salmon are caught in the commercial fishery, some released salmon may survive to spawn. This action would maintain the department's flexibility to manage sockeye salmon returns to KMA westside systems.

Detriments:

This action would be considered allocative because it would further reduce commercial harvest of king salmon.

Restrictions on commercial salmon fisheries adjacent to the Inner and Outer Karluk sections will result in an unknown savings to Karluk king salmon stocks because the contribution of these fish to Karluk River is unknown. The potential conservation of Karluk king salmon stock needs to be weighed against the foregone harvest of king salmon of unidentified origin in these commercial seine fisheries.

Action#3

Maintain regulations as currently specified in the 5 AAC 18.362. *Westside Kodiak Salmon Management Plan*; and 5 AAC 18.395. *Retention of king salmon taken in a commercial fishery*. In addition, require nonretention of king salmon for sections adjacent to the Inner and Outer Karluk sections, including sections of the Northwest Kodiak District and Southwest Kodiak District for all gear types (Figure 1).

Specific Action:

Take board action to expand area referenced in 5 AAC 18.395. When king salmon runs to the Karluk system are weak, the department would enforce nonretention in all sections of the Northwest Kodiak District and Southwest Kodiak District for all gear types.

Background:

King salmon harvests in the KMA commercial fisheries are incidental. Currently, there are no management plans directing the department with regard to king salmon management. However, the department does have EO authority to limit the harvest of king salmon by requiring the release of king salmon over 28 inches in length within the Inner and Outer Karluk sections and the Inner and Outer Ayakulik sections. The department has enforced this provision when it became apparent the king salmon runs were weak.

Benefits:

The department does not have a stock separation plan for king salmon on the westside. However, assuming some Karluk River king salmon are harvested, some of the released salmon may return to spawn. This action would maintain the department's flexibility to manage sockeye salmon runs to KMA westside systems.

Detriments:

This action would be considered allocative because it would further reduce commercial seine and set gillnet harvest of king salmon.

Restrictions on commercial salmon fisheries adjacent to the Inner and Outer Karluk sections will result in an unknown savings to Karluk king salmon stocks because the contribution of these fish to Karluk River is unknown. The potential conservation of Karluk king salmon stock needs to be weighed against the foregone harvest of king salmon of unidentified origin in these commercial seine and gillnet fisheries.

King salmon caught in gillnet gear are unlikely to survive; therefore, nonretention in the set gillnet fishery would likely not benefit Karluk River king salmon.

SUBSISTENCE FISHERIES MANAGEMENT ACTIONS

Past Management Actions

The subsistence fishery was closed by emergency order during 2008 inriver above Karluk River weir and within the entire drainage during 2009 and 2010 (Figure 4). These actions reduced harvests from average harvest levels reported on permit returns from 1997–2005 (Table 1).

Potential Management Actions

Action#1

Status quo. The department is tasked with the management of salmon and uses EO authority to manage subsistence fisheries.

Specific Actions:

When king salmon runs to the Karluk system are weak, the department would enforce nonretention of king salmon in the subsistence fishery in the Karluk drainage.

Background:

King salmon subsistence harvests in the Karluk drainage are relatively low compared to sport and commercial harvests. Currently, there are no management plans directing the department with regard to king salmon subsistence management. However, the department does have EO authority to limit the harvest of king salmon, and, in conjunction with the federal subsistence fishery managers, has enforced nonretention of king salmon in the subsistence fishery when it became apparent the king salmon runs were weak (Figure 4). In 2005 the board made a customary and traditional subsistence use finding in the Kodiak area for salmon (5 AAC 01.536).

Benefits:

Currently, the department does have the ability to apply conservation measures to protect Karluk River king salmon in years when runs are weak.

Detriments:

In years of weak runs, restricting area or time in the subsistence fishery may impact reasonable opportunity to harvest the amount necessary for subsistence.

SPORT FISHERY MANAGEMENT ACTIONS

Past Management Actions

The commissioner may, by emergency order, change bag and possession limits and annual limits and alter methods and means in sport fisheries (5 AAC 75.003). These changes may not reduce the allocation of harvest among other user groups. An emergency order may not supersede provisions for increasing or decreasing bag and possession limits or changing methods and means specified in regulatory management plans established by the Board of Fisheries.

The Division of Sport Fish began taking inseason management actions to conserve Karluk River king salmon in 2001, and has used the commissioner's EO authority to implement inseason bag limit restrictions, nonretention regulations, and/or total fishery closures annually (with the exception of 2004) from 2001 through 2010. Preseason actions were implemented beginning in 2007 with a reduction in bag limit from two king salmon per day 20 inches or greater in length to one per day 20 inches or greater in length. In 2008, the king salmon fishery was restricted to nonretention preseason and then closed by EO on June 30, and total sport fish closures were implemented preseason in 2009 and 2010 (Figure 3).

Potential Management Actions

Action#1

Status quo. The preseason sport fishery closures in 2009 and 2010 are the most restrictive management actions that can be implemented by the Division of Sport Fish. The Division of Sport Fish will continue to use its EO authority to manage the Karluk River king salmon stock to achieve the escapement goal and rebuild from the recent period of low productivity.

Specific Action:

Use EO authority to restrict the Karluk River king salmon sport fishery with additional restrictions or closures, as needed, inseason.

Background:

Karluk River is open to fishing for king salmon January 1–July 25. The king salmon bag limit is two per day, two in possession for fish 20 inches or greater in length; 10 per day, 10 in possession for fish less than 20 inches in length; and a five fish annual limit for fish 20 inches or greater in length. The Division of Sport Fish began taking inseason management actions to conserve Karluk River king salmon in 2001, and has used the commissioner's EO authority to implement inseason bag limit restrictions, nonretention regulations, and/or total fishery closures annually (with the exception of 2004) in the Karluk River drainage (Figure 3).

Benefits:

The benefits of providing the department the flexibility to manage Karluk king salmon stocks inseason with EO authority are timely and meaningful management actions based on current run strength. The department has, and has used, EO authority to manage the sport fishery to achieve established escapement goals. As the Karluk king salmon run rebuilds, the department would have the ability to return to more liberal bag limits and provide angler opportunity prior to the next board meeting.

Detriments:

Since inseason actions are based on current data and are implemented in response to the strength or weakness of a run, there is less predictability on when particular management actions may be taken.

Action#2

Restrict the Karluk River sport fisheries by regulation. Board action could create a Karluk River king salmon nonretention fishery, or close other Karluk sport fisheries to reduce incidental harvest or release mortality of Karluk River king salmon.

Specific Action:

Take board action to create new regulations for the Karluk River sport fisheries.

Background:

Karluk River is open to fishing for king salmon January 1–July 25. King salmon bag limit is two per day, two in possession for fish 20 inches or greater in length; 10 per day, 10 in possession for fish less than 20 inches in length; and a five fish annual limit for fish 20 inches or greater in

length. The Division of Sport Fish began taking inseason management actions to conserve Karluk River king salmon in 2001, and has used the commissioner's EO authority to implement inseason bag limit restrictions, nonretention regulations, and/or total fishery closures annually (with the exception of 2004) in the Karluk River drainage (Figure 3).

Benefits:

Fisheries restrictions or closures in regulation may provide the most stable situation for user groups who do not like changes inseason.

Detriments:

Regulations may restrict the department's ability to react to run strength inseason, or create overly restrictive regulations that cannot be addressed until the next scheduled Kodiak board meeting.

Action#3

Restrict the king salmon sport fishery in the salt water outside the Karluk drainage. Restrictions could be bag limit reductions (current bag limit is two per day, two in possession, no size or annual limit), nonretention, or total closure depending on the strength of the Karluk king salmon run.

Specific Action:

Take board action to restrict the king salmon sport fishery in the salt water of Uyak Bay (Figure 1) by regulation.

Background:

Karluk River is open to fishing for king salmon January 1–July 25. King salmon bag limit is two per day, two in possession for fish 20 inches or greater in length; 10 per day, 10 in possession for fish less than 20 inches in length; and a five fish annual limit for fish 20 inches or greater in length. The Division of Sport Fish began taking inseason management actions to conserve Karluk River king salmon in 2001, and has used the commissioner's EO authority to implement inseason bag limit restrictions, nonretention regulations, and/or total fishery closures annually (with the exception of 2004) in the Karluk River drainage (Figure 3).

Restrictions have not been implemented on sport fisheries outside the Karluk drainage. Statewide Harvest Survey data indicates an average (2005–2009) of 340 king salmon is harvested by recreational anglers in the salt water of Uyak Bay. The origin of these king salmon is unknown but, due to the proximity of Uyak Bay to Karluk River, it is likely some are Karluk River stock.

Benefits:

Restricting the saltwater king salmon harvest in Uyak Bay would likely reduce another source of harvest of Karluk king salmon.

Detriments:

Restrictions on king salmon fisheries outside the Karluk drainage will result in an unknown savings to Karluk king salmon stocks because the contribution of these fish to Karluk River is unknown.

Summary of Potential Management Actions:

Fishery/Action number	Summary	Specific Action
CF/#1	Status quo. Maintain current regulations, including nonretention of commercially-caught king salmon.	Continue using current nonretention regulations.
CF/#2	Expand nonretention to sections adjacent to Inner and Outer Karluk (seine gear only).	Board action needed to create regulations.
CF/#3	Expand nonretention to sections adjacent to Inner and Outer Karluk (all gear types).	Board action needed to create regulations.
Sub/#1	Status quo. Maintain current EO management for subsistence harvests.	Continue using EO authority.
SF/#1	Status quo. Use EO to manage sport fishery, with additional closures and restrictions as needed.	Continue using EO authority.
SF/#2	Restrict sport fishery by regulation (king salmon nonretention and/or closures for other species).	Board action needed to create regulations.
SF/#3	Restrict sport fishery in salt water of Uyak Bay.	Board action needed to create regulations.

RESEARCH PLAN

The department currently assesses Karluk River king salmon escapement and harvests annually. The following research projects include current and proposed projects used to gather detailed information about king salmon in the Karluk River.

CURRENT RESEARCH PROJECTS

Salmon returning to the Karluk River are counted at a weir located 1.4 km (0.8 mi) upstream from Karluk Lagoon, operated primarily for sockeye salmon. King salmon return from late May through early September, with the peak of the run usually from June 15 to June 22 (Tiernan and Caldenty 2010). The weir is operated by staff from the Division of Commercial Fisheries from mid May to late September, with assistance from Sport Fish staff from mid May through July 15 specifically to assist with data collection from king salmon. All king salmon are counted and age, sex, and length (ASL) data collected from a sample, then passed upstream of the weir. Data collected are used to monitor escapement size and quality, track productivity, and generate data needed to review and update escapement goals. Weir operation will continue in future years, although collection of ASL data may vary with field staff levels.

POTENTIAL ADDITIONAL RESEARCH PROJECTS

The following research projects are planned or, contingent upon funding, could be implemented to gather further detailed information about king salmon stocks in the Karluk drainage. These projects focus primarily on improving knowledge of freshwater production and assessing genetic diversity among regional king salmon stocks.

1. The Division of Commercial Fisheries will monitor body condition and age of sockeye salmon smolts migrating from the Karluk River from 2011 through 2013 to determine if primary and secondary productivity in Karluk Lake correlate with size and condition of sockeye salmon smolts. As part of this sampling effort, length, weight, and scale samples will be collected opportunistically from king salmon smolts to evaluate body condition and track it over time.

2. Annual abundance of king salmon smolts in the Karluk River is unknown. A project to estimate king salmon smolt abundance, age composition, and average size at age would cost approximately \$70,000 annually. This project idea has been discussed, but not proposed for funding. This type of study would need to be conducted at least three years to provide useful information. The study would provide data on the annual timing and peak of the smolt outmigration, and in conjunction with estimates of total adult run, provide estimates of marine survival and a better understanding of freshwater vs. marine productivity of Karluk River king salmon (i.e., abundance and condition of smolt produced by a given escapement and smolt-to-adult survival in the marine environment).
3. The department has been developing a genetic baseline for king salmon stocks in Alaska. As part of this program, Karluk River king salmon were identified as a stock to be included in the genetic baseline. Samples from 140 Karluk River king salmon were collected in 1993 and 2006. Ideally, a total of 200 adult king salmon from the spawning population in the Karluk River (Chris Habicht, ADF&G Gene Conservation Laboratory, personal communication) should be sampled to complete the baseline. The department plans to collect the remaining 60 samples in 2011. Preliminary results from the department show a high likelihood of being able to identify king salmon of Karluk River origin from other west coast Pacific Coast stocks, including Ayakulik and Chignik river stocks (Chris Habicht, ADF&G, Gene Conservation Laboratory, personal communication).

In addition to the genetic samples from Karluk River king salmon, the department would like to collect additional king salmon tissue samples from the following systems (sample sizes in parentheses). These samples would be used to develop the genetic baseline for the Division of Commercial Fisheries, Westward Region, and could provide a more complete understanding of contributions to the commercial harvest from king salmon from other watersheds.

- Ayakulik River (64)
- Nelson River (105)
- Sandy River (200)
- King Salmon River (69)
- Meshik River (158)
- Chignik River (125)
- Bear River (200)
- Ilnik River (200)

At this time there are no funds identified to collect these additional tissue samples.

4. In 2011, the department will develop a watershed model to estimate the expected carrying capacity of king salmon in the Karluk watershed, and the escapement that may produce maximum sustained yield (Parken et al. 2006, Liermann et al. 2010). A geographic information system (GIS) would be used to quantify the watershed area for this model. The existing habitat-based model estimates of MSY and spawner capacity will be compared to escapement goals and historical escapements.

Literature Cited

- Liermann, M.C., R. Sharma, and C.K. Parken. 2010. Using accessible watershed size to predict management parameters for Chinook salmon, *Oncorhynchus tshawytscha*, populations with little or no spawner-recruit data: a Bayesian hierarchical modeling approach. *Fisheries Management and Ecology* 17, 40-51.
- Nemeth, M. J., M. J. Witteveen, M. B. Foster, H. Finkle, J. W. Erickson, J. S. Schmidt, S. J. Fleischman, and D. Tracy. 2010. Review of escapement goals in 2010 for salmon stocks in the Kodiak Management Area, Alaska. Alaska Department of Fish and Game, Fishery Manuscript Series No. 10-09, Anchorage.
- Parken, C.K., R.E. McNicol, and J.R. Irvine. 2006. Habitat based methods to estimate escapement goals for Chinook salmon stocks in British Columbia, 2004. Research Document 2006/083. Ottawa, ON: Canadian Science Advisory Secretariat, 74 pp.
- Tiernan, A. R., and I. O. Caldentey. 2010. Kodiak Management Area weir descriptions and salmon escapement report, 2009. Alaska Department of Fish and Game, Division of Commercial Fisheries, Fishery Management Report No. 10-36, Anchorage.

Table 1. –Karluk River king salmon harvest, and escapement, 1976–2010.

Run Year	Commercial Harvest ^a	Subsistence Harvest ^b	Sport Harvest ^c	Total Harvest	Weir Count ^d	Escapement ^e
1976	2	0	461	463	6,897	6,436
1977	0	0	461	461	8,434	7,973
1978	35	0	461	496	9,795	9,334
1979	0	0	461	461	9,555	9,094
1980	0	0	461	461	4,810	4,349
1981	0	0	461	461	7,575	7,114
1982	0	0	796	796	7,489	6,693
1983	0	0	304	304	11,746	11,442
1984	2	0	175	177	7,747	7,572
1985	5	0	472	477	5,362	4,890
1986	542	0	122	664	4,429	4,307
1987	313	0	199	512	7,930	7,731
1988	3	0	819	822	13,337	12,518
1989	0	0	559	559	10,484	9,925
1990	0	0	700	700	14,442	13,742
1991	0	0	1,599	1,599	14,022	12,423
1992	264	0	856	1,120	9,601	8,745
1993	3,082	5	1,634	4,721	13,944	12,310
1994	5,114	13	1,483	6,610	12,049	10,566
1995	1,794	31	1,284	3,109	12,657	11,373
1996	1,662	4	1,695	3,361	10,051	8,356
1997	1,445	17	1,574	3,036	13,443	11,869
1998	252	4	1,173	1,429	10,239	9,066
1999	1,067	7	1,766	2,840	13,063	11,297
2000	693	22	2,581	3,296	10,460	7,879
2001	2,588	24	1,304	3,916	4,453	3,149
2002	1,262	165	716	2,143	7,175	6,944
2003	1,336	6	563	1,905	7,256	6,986
2004	2,249	16	690	2,955	7,525	7,228
2005	349	5	368	722	4,798	4,684
2006	900	17	670	1,587	4,112	3,673
2007	313	1	205	519	1,765	1,697
2008	13	5	0	18	752	752
2009	0	0	0	0	1,306	1,306
2010	0	0 ^f	0	0	2,916	2,916
1997-2006 AVG	1,214	28	1,141	2,383	8,252	7,278
2007-2010 AVG	82	2	51	134	1,685	1,668

^a Source: ADF&G, Division of Commercial Fisheries Statewide Harvest Receipt (fish ticket) database. Commercial harvest is the harvest of king salmon from Inner and Outer Karluk statistical areas (255-10 and 255-20) through July 15.

^b Based on subsistence harvest records maintained by the Westward Region of ADF&G's Division of Commercial Fisheries; includes all reported harvest in Karluk Section.

^c Sport harvest is from the Statewide Harvest Survey.

^d Source: ADF&G, Division of Commercial Fisheries Kodiak weir count database.

^e Escapement is the weir count minus the sport harvest. 1976-2001 includes all sport harvest. 2002-2010 only includes sport harvest upstream of the weir.

^f Subsistence fishery closed; no reported harvest to date.

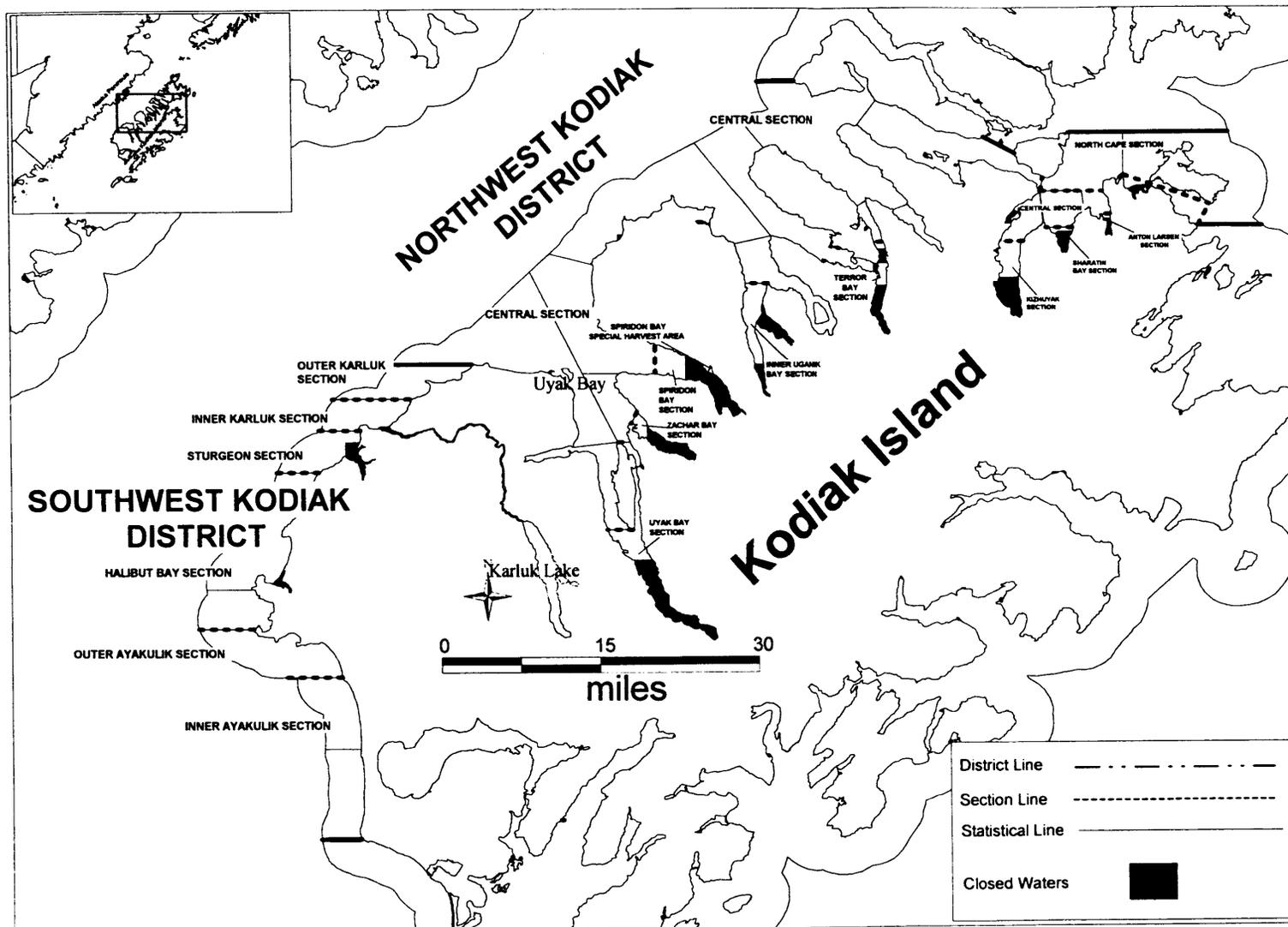


Figure 1.—Map of the Karluk River watershed, location of fish counting weir, and commercial fishery sections.

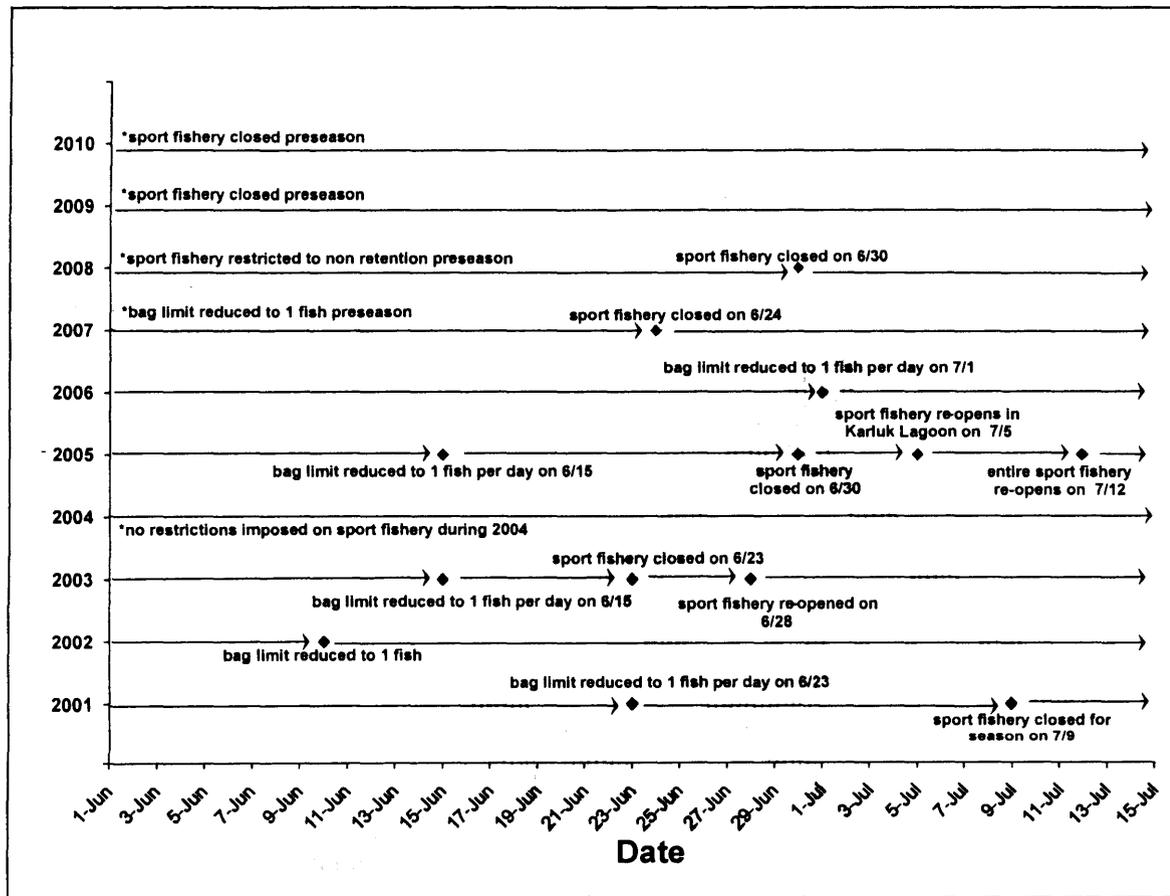


Figure 3. –Karluk River king salmon sport fishery management actions, 2001–2010.

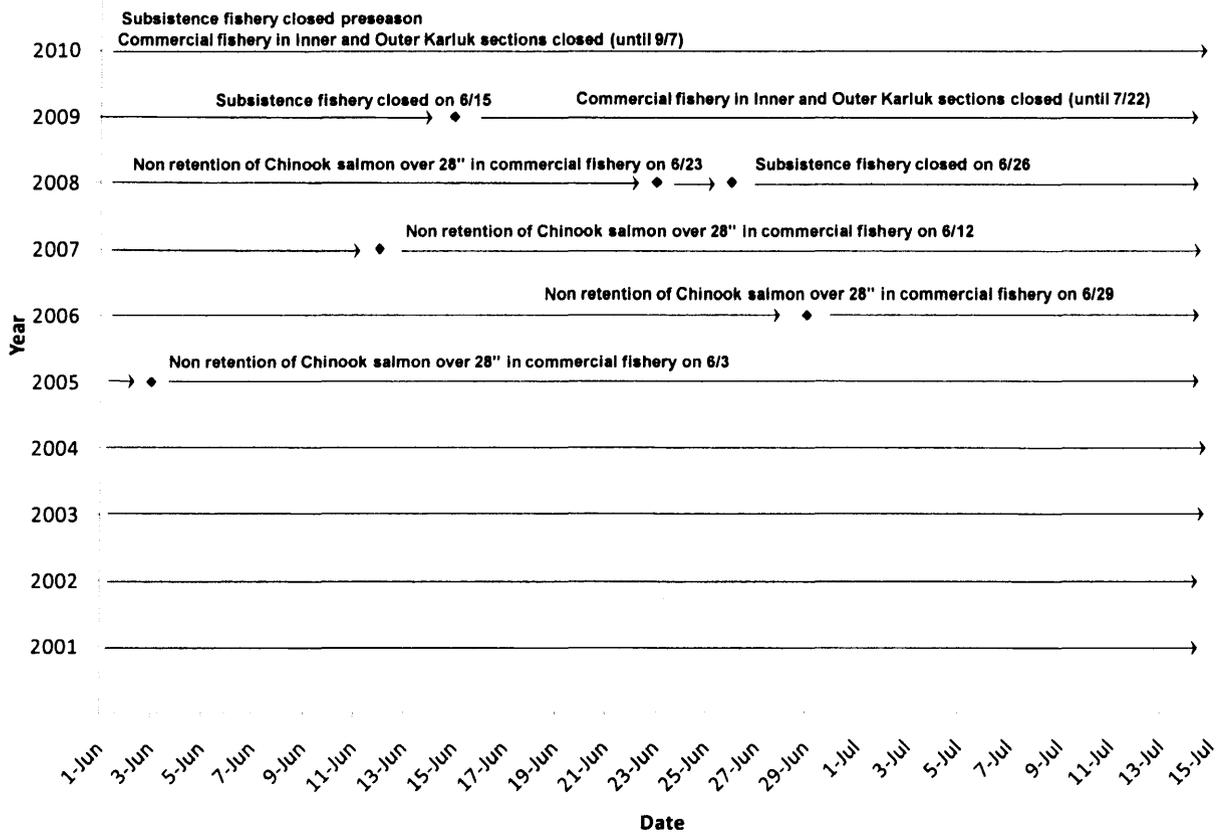


Figure 4.-Karluk River king salmon commercial and subsistence fishery management actions, 2001–2010.

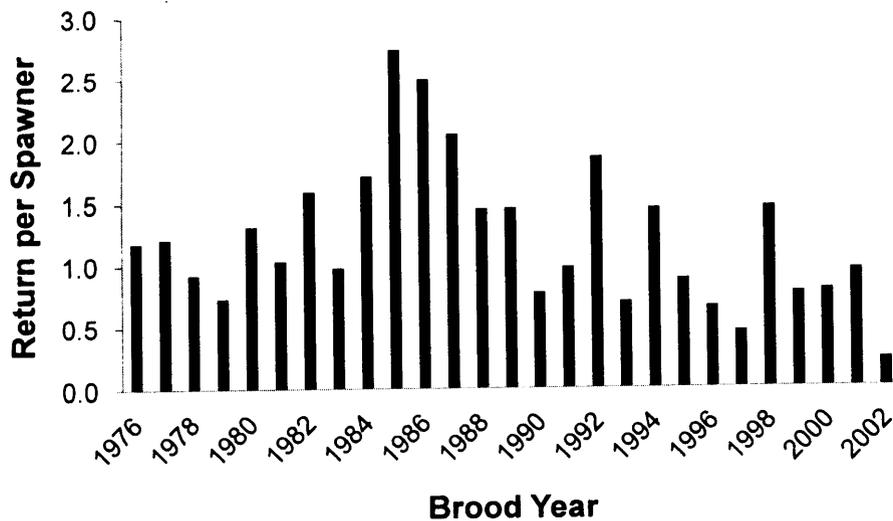


Figure 5.—Karluk River king salmon annual return per spawner, brood years 1976-2002.

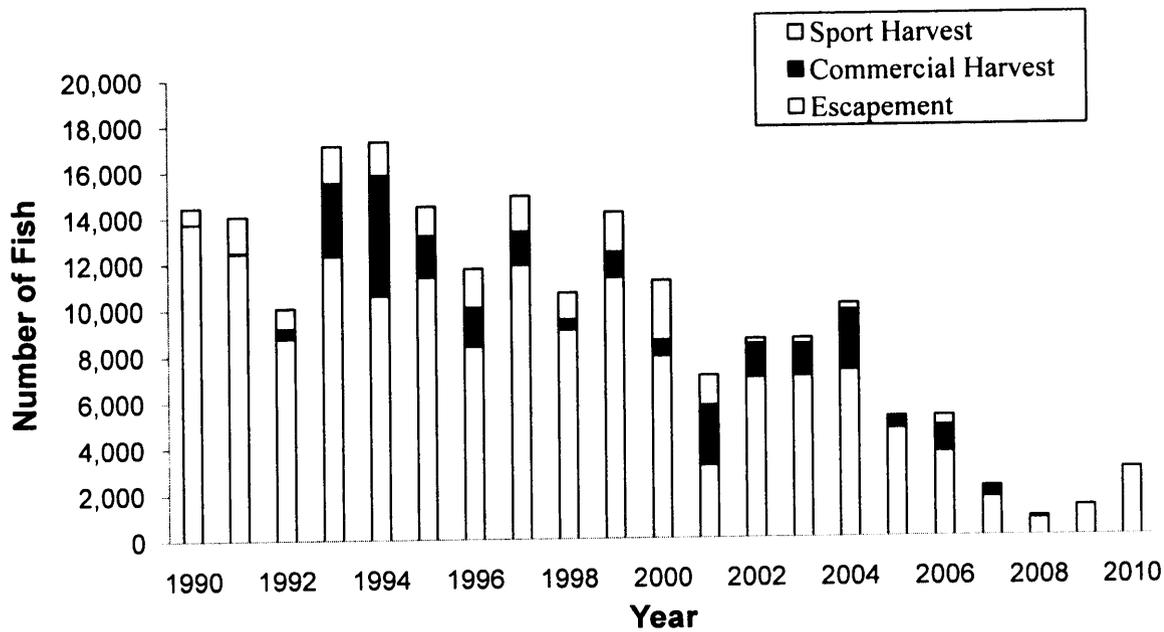


Figure 6.—Sport and commercial harvest, and escapement of Karluk River king salmon, 1990 – 2010.

Alaska Department of Fish and Game
Division of Commercial Fisheries



Date _____

PROPOSALS 52 and 53

In the original analysis included in staff comments for proposals 52 and 53, observer data was extrapolated based upon the estimated pollock harvest weight. After consultation with National Marine Fisheries Service (NMFS), it was determined that NMFS extrapolates based upon fish ticket weight of vessels with observer coverage. A conversion error was also discovered. The result of both of these corrections, as noted in the revised tables, is that observer coverage generally increased from the original analysis, but resulting estimates of bycatch are generally similar, although estimates of king salmon bycatch in Sitkalidak Strait are lower than originally estimated.

The revised tables below should replace original tables found in RC 2 for proposals 52 and 53.

Proposal 52

ORIGINAL

Table 52-2. Total walleye pollock harvest (all vessel sizes), observed walleye pollock harvest, and percent of harvest observed in Sitkalidak Strait, 2005–2009.

Year	Sitkalidak Strait Pollock Harvest	Pollock Harvest w/ Observer Onboard	Percent Harvest w/ Observer Onboard
2005	762,658	143,648	19
2006	2,017,090	438,459	22
2007	1,474,725	162,904	11
2008	358,853	155,268	43
2009	0	0	n/a

Note: Harvest in pounds.

REVISED

Year	Sitkalidak Strait Pollock Harvest	Pollock Harvest w/ Observer Onboard	Percent Harvest w/ Observer Onboard
2005	762,658	390,524	51
2006	2,017,090	818,173	41
2007	1,474,725	419,407	28
2008	358,853	223,079	62
2009	0	0	n/a

Note: Harvest reported in pounds.

ORIGINAL

Table 52-3. Pelagic trawl harvest in pounds (observer data) from Sitkalidak Strait, 2005–2009.

Species	2005	2006	2007	2008	2009	Average
Pacific halibut	80	271	154	35	0	108
Pacific cod	2,952	46,119	39,289	4,273	0	18,527
Lingcod	0	0	0	0	0	0
Black rockfish	0	0	0	0	0	0
King salmon	770	869	3,612	18	0	1,054
Tanner crab	0	0	9	0	0	2

Note: Harvest reported in pounds.

REVISED

Species	2005	2006	2007	2008	2009	Average
Pacific halibut	67	317	118	53	0	111
Pacific cod	2,501	53,890	30,042	6,573	0	18,601
Lingcod	0	0	0	0	0	0
Black rockfish	0	0	0	0	0	0
King salmon	296	461	1,253	13	0	405
Tanner crab	0	0	3	0	0	1

Note: Harvest reported in pounds.

Proposal 53

ORIGINAL

Table 53-2. Total walleye pollock harvest (all vessel sizes), observed walleye pollock harvest, and percent of harvest observed in Marmot Bay, 2005–2009.

Year	Marmot Bay Pollock Harvest	Pollock Harvest w/ Observer Onboard	Percent Harvest w/ Observer Onboard
2005	11,009,569	2,446,918	22
2006	9,724,719	2,077,032	21
2007	6,886,696	2,797,880	41
2008	7,245,582	2,882,356	40
2009	10,420,228	3,871,626	37

Note: Harvest reported in pounds.

REVISED

Year	Marmot Bay Pollock Harvest	Pollock Harvest w/ Observer Onboard	Percent Harvest w/ Observer Onboard
2005	11,009,569	3,526,883	32
2006	9,724,719	3,690,886	38
2007	6,886,696	2,401,127	34
2008	7,245,582	2,569,394	35
2009	10,420,228	6,420,194	62

Note: Harvest reported in pounds.

ORIGINAL

Table 53-3. Pelagic trawl harvest (observer data) from Marmot Bay, 2005–2009.

Species	2005	2006	2007	2008	2009	Average
King salmon	11,116	33,679	5,837	586	1,175	10,479

Note: Harvest reported in pounds.

REVISED

Species	2005	2006	2007	2008	2009	Average
King salmon	19,791	28,804	5,421	1,655	1,202	11,375

Note: Harvest reported in pounds.

RC 8



KONIAG
INCORPORATED

September 2, 2010

Mr. Webster
Chairman of the Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Webster and members of the Board;

Koniag, Inc is requesting that you consider designating the Karluk River King Salmon population as a stock of concern. The Sustainable Salmon Fisheries Policy defines a conservation concern as the chronic inability, despite the use of specific management measures, to maintain escapements above a sustainable escapement threshold. Chronic inability is defined as continuing inability to meet escapement thresholds over a four to five year period. Karluk River King Salmon meet all of these criteria. After 20 years of abundant returns, Karluk King Salmon have not achieved their biological escapement goal (3,600-7,300) for five consecutive years, despite the use of specific management restrictions, including complete closures of sport, commercial and even subsistence king salmon fisheries. In 2008, only 752 King Salmon were counted through the weir.

Koniag, Inc has a vested interest and a strong desire to see the recovery of the Karluk River King Salmon stocks as Koniag is the most directly affected native corporation. The Corporation owns a majority of the uplands along Karluk River and Lake. We have entered into a Conservation Easement Agreement with US Fish and Wildlife and the State of Alaska, designed to protect salmon habitat and specifically the king salmon sport fishery. Additionally, the impact of closures and unpredictable seasons significantly impact our operations and the operations of our shareholder businesses in a negative way. The king salmon fishery was closed for the entire 2010 season and the sport fishery most of the 2009, 2008 and 2007 seasons. The closures of sport and subsistence fisheries are causing sustainability to be a serious concern.

Attached please find a copy of the Regulations Proposal Form and supporting documentation which we submitted to the Department on April 9, 2010. We continue to assert that we would like to work with the Board, the Department and other stake holders in developing an action plan as specified in the Sustainable Fisheries Policy. Developing such an action plan should help bring about the recovery of the Karluk River King Salmon, which will benefit all users.

Thank you for your consideration in this matter,

William Anderson, Jr
President & CEO

RECEIVED
SEP 9 2010
BOARD

194 Alimaq Drive
Kodiak, Alaska 99615
1-800-658-3818
(907) 486-2530
FAX (907) 486-3325

**Karluk River Advisory Committee
Formal Recommendation #10-04**

WHEREAS, Koniag, Inc. is the regional native corporation for the Kodiak Island area formed under the Alaska Native Claims Settlement Act; and

WHEREAS, Koniag holds title to surface estate surrounding Karluk River, Sturgeon River and Karluk Lake; and

WHEREAS, The lands, fish and wildlife in the Karluk drainage are important to shareholders from Karluk and Larsen Bay for subsistence and livelihood; and

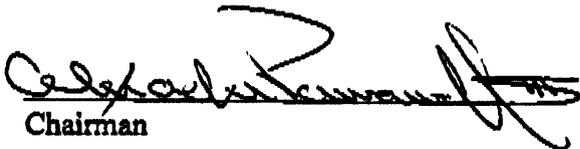
WHEREAS, The Chinook Salmon are an important subsistence resource for the villages of Karluk and Larsen Bay; and

WHEREAS, The Karluk River Advisory Committee was formed to provide shareholder input on management of the above mentioned lands; and

WHEREAS, There has been a concern by the Karluk River Advisory Committee and the Villages of Larsen Bay and Karluk regarding the low escapement of Chinook salmon on the Karluk River;

NOW THEREFORE BE IT FORMALLY RECOMMENDED by the Karluk River Advisory Committee to support Koniag Inc. in their proposal to the Alaska Department of Fish and Game to make the Karluk River Chinook salmon a stock of concern.

ADOPTED AND DATED as of this 7th day of April, 2010 at KODIAK, Alaska

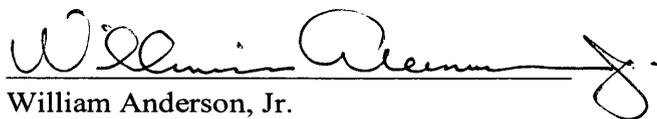

Chairman

ATTEST: The below signatures represent an acknowledgement by the President of Koniag and its Lands Manger that the recommendation is consistent with the corporation's goals and policies. The signatures indicate the corporation's commitment to making a good faith effort in implementing the recommendation.

Remarks:

 4-9-10

Chuck Reft
Manager
Land & Natural Resources



William Anderson, Jr.
President and CEO
Koniag, Inc.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, Alaska 99615
(907) 487-2600

April 9, 2010

Alaska Board of Fisheries/Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Sirs:

I would like to express the support of the Kodiak National Wildlife Refuge for Koniag Native Corporation's proposal to list Karluk River Chinook salmon as a stock of concern. After many years of abundant returns, we have seen a declining trend for at least the past 5 years. The stock has failed to meet its minimum biological escapement goal for the past 3 years and the forecast for 2010 is another poor year. The 2010 Chinook sport fishery has been closed prior to the season with the subsistence fishing also likely to be closed in the near future.

For years Karluk River Chinook salmon have supported robust subsistence and sport fisheries. The Karluk Chinook sport fishery was the largest and most popular on Kodiak Island, supporting hundreds of guided and unguided anglers each year. The subsistence fishery provided critical food resources for the residents of Karluk and Larsen Bay. Consequently, the current situation has resulted in the inability of local resident to meet subsistence needs for Chinook salmon, a loss in opportunity for thousands of anglers, and a loss of millions of dollars in revenue for guides, lodges, and air taxi operators.

Designating Karluk River Chinook salmon as a stock of concern will place a proper focus of attention on this stock and allow the development of management plans to recover the stock. It will also hopefully direct research funding toward understanding the causes for the current decline and lead to management action that will increase returns.

Thank you for your attention and support regarding this critical situation.

Sincerely,

Refuge Manager

Benefits of a Sport Fish Optimal Escapement Goal (OEG)

Catch and Release

King Salmon Fishing in the Karluk River

1) A Catch and Release OEG would eliminate the continuation of unnecessary / error closures for fisheries that are in progress.

2) A Catch and Release fishery would remove very few fish from the spawning population.

3) An OEG would more equitably distribute the burden of conservation.

4) Allows a fishery to occur, when at least 50% of the lower range is projected

1: Elimination of unnecessary / error closures.

Kodiak king salmon stocks began to decline in abundance in 2001 and at the same time **run timing became erratic and unpredictable**. As a result, it was difficult for ADFG to accurately predict whether the escapement goal would be achieved or not. In 2003, 2005, 2007 and 2010 king salmon sport fisheries in either the Karluk or Ayakulik River were closed in season by emergency order, only to be reopened an average of six days later, after the fish unexpectedly arrived and escapement goals were achieved. **In hindsight these closures were not necessary to achieve the escapement goal**. These closures **adversely impacted the sport fishery**, because 80% of the visitors live out of state and have to cancel all their travel plans, including plane tickets, vacation dates, and stays with lodges/guides. Implementing a catch and release fishery, instead of a complete closure, **would give ADFG more time to evaluate** the return before making what could prove to be an unnecessary closure. If an OEG which allowed for catch and release fisheries when the escapement goal was not projected to be achieved, the unnecessary closures implemented in 2003, 2005, 2007 and 2010, would not have occurred.

2: Small impact on stock reproduction due to OEG

The Karluk River is **very remote, difficult and expensive to access, all of which limits effort**. Participation is additionally capped by the terms of a Conservation Easement between the land owner (Koniag Native Corp.), the Kodiak National Wildlife Refuge and the State of Alaska. Permits are required within the easement area and are limited to 70 visitors on any day, 60% of which must be under the supervision of a guide. Participation also drops when trends in king salmon abundance are low. All of the factors above indicate that **low effort can be expected in this fishery**.

Catch rates will also be low when abundance is low and bait is removed from the fishery, which always occurs in catch and release fisheries.

Hooking mortality was estimated at 7% in a 3 year intensive study of catch and release king mortality on the Kenai River. **Due to low effort, low catch rates and small mortality associated with release, the number of fish removed from the spawning population will be very small, probably in the magnitude of one to two hundred fish**. The impact of this small removal on stock reproduction is impossible to quantify because it is so small/insignificant. The lower end of the escapement goal range

has changed three times in the past 10 years and has fluctuated by more than 1,500. This indicates the difficulty of access the impact 1,500 fish on maximum sustain yield. The Board of Fish has authority to establish a Catch and Release OEG, if it determines that the benefit of allowing a sport fishery to continue in a predictable/orderly fashion outweighs the impact of removing an insignificant amount of fish from the spawning population.

3) More equitable distribution of Conservation Burden:

The following users harvest Karluk King salmon with the associated restrictions:

- 1) Kodiak Set Nets: (closest legal water is 10 miles from Karluk R) **No Restrictions**
- 2) Kodiak Seine Fishermen: If goal is not achieved, in the Inner/Outer Karluk Sections only, large king salmon **must be released, kings 28" and smaller may be harvested.**
- 3) Trawl fisheries: King salmon **may not be retained**
- 4) Saltwater sport fisheries: **Harvest Guideline** of 11,000 and associated mgmt. plan.
- 5) Subsistence Fishing: Traditional area remains open, when goal will not be achieved, king salmon **must be released.**
- 6) Karluk River Sport Fishery: **COMPLETE CLOSURE** when goal is not achieved.

A Karluk River catch and release sport fishery produces one of the smallest mortalities in any of the fisheries that occur, but is the most heavily restricted. It is the only fishery which completely closes, when the goal is not achieved. All other fisheries are allowed to continue. An OEG allowing for catch and release would be a fairer distribution of the Conservation Burden.

4) Allows for Fishery to Occur

The Karluk River King Salmon Spawning escapement in 2010 was 2,917 and the sport fishery was closed for the entire season. The lower end of the new spawning goal range is 3,000 fish. If the 2010 return repeated year after year, according to current management practices, the sport fishery would never be allowed to operate. Creating an OEG, where a no-bait catch and release fishery was allowed if 50% of the lower end of the escapement goal range was projected, would allow for a fishery. The spawning escapement would only be reduced by several hundred fish due to hooking mortality but a fishery could occur.

<u>OEG</u>	<u>2010 Escapement</u>	<u>Sport Fishery</u>
No	2,917	Closed All Season
Yes	2,713*	Open to Catch and Release All Season

*estimated hooking mortality is 204 fish, if every fish was caught and released with a 7% hooking mortality

Kodiak River King Salmon Sport Fish
In-season Closures*
Followed by Reopenings
Escapement Goals Achieved

<u>Year</u>	<u>River</u>	<u>Closure Date</u>	<u>Reopening Date</u>	<u>Weir Count At Closure</u>	<u>Projected Final Weir Count</u>	<u>Actual Spawning Escapement</u>	<u>Goal</u>
2003	Karluk	6/23	6/28	6/21=2,269	3,403	6,986	3,600 - 7,300
2005	Karluk	6/30	7/5+7/12	6/27=2,568	3,132	4,684	“ ”
2007	Ayakulik	6/27	7/2	6/24=2,482	3,350	6,410	4,800 - 9,600
2010	Ayakulik	6/26	7/7	6/22=2,183	4,120	5,310	“ ”

PROBLEM:

1) **Inseason closures are very disruptive** to the sport fishery. 80% of visitors live out of state and have made extensive long range plans (purchased plane tickets, vacation dates, guide deposits), which all have to be cancelled when the fishery is completely closed.

2) **ADFG does not have the authority to allow for a catch and release fishery** if it appears the escapement goal will not be achieved. (5AAC 75.Emergency Order Authority (1) (B) ...the department may issue a "catch and release only" emergency order when the estimated hooking mortality is not projected to reduce the population of fish below the level required for spawning escapement).

SOLUTION:

The Board creates an Optimum Escapement Goal (OEG) as authorized under Chapter 39, Sustainable Salmon Fisheries. **The OEG would permit a catch and release fishery to occur if at least 50% of the lower end of the escapement goal range is projected to be achieved.**

Establishing an OEG would allow for fisheries to be put on catch and release instead of completely closed. Karluk is a good candidate for this type of management action because it is remote, expensive and difficult to access, has a conservation easement which restricts the number of anglers allowed on the river. All of these factors help ensure that mortality associated with catch and release will be insignificant, due in part to low fishing effort.

*Had OEGs been in effect, **none of the above fisheries would have been mistakenly closed. If an OEG is not established, the list of unnecessary closures will grow.**

**How Many Fish Would Be Caught
In A
Catch and Release Fishery
When the Weir Count was 3,000???**

<u>Year</u>	<u>Weir Count</u>	<u>Catch</u>	<u>Restrictions</u>
2002	7,175	2,869	No Restrictions, bait allowed, open all season
2004	7,306	2,078	“ ”
2006	4,112	1,153	Bag limit reduced 1/day on July 1, bait allowed Open all season

2010 Hypothetical Catch

2010	2,917	??? 1,153 ???	No Bait, Catch and Release only
------	-------	---------------	---------------------------------

The 2010 catch would probably have **been less** than the catch in **2006**, because the 2010 run was 30% lower than 2006 and bait was allowed in 2006 and would not have been allowed in 2010. Even if we assume that the 2010 catch was the same as 2006, **a hooking mortality of 7% on 1,153 released fish would have been only 81 fish.**

The “cost” of conducting a catch and release fishery all season long in 2010 would have probably been less than lowering the spawning escapement from 2,917 to 2,836.

KONIAG PROPOSAL FOR MANAGMENT OF THE KARLUK RIVER
SPORT FISHERY
REGULATORY AND ACTION PLAN WORDING

5 AAC 64.0XX. Karluk River King Salmon Sport Fishery Management Plan

(a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of stabilizing sport fishing opportunity for Karluk River king salmon while sustaining long term health of the king salmon stock.

(b) In the Karluk River king salmon sport fishery,

(1) the Biological Escapement Goal (BEG) is 3,000-6,000 king salmon;

(2) an Optimal Escapement Goal (OEG) to allow catch and release-only fishing is 1,500-3,000 king salmon;

(3) the inriver sport harvest will be estimated annually by the department's statewide harvest survey; however, harvest estimates used for inseason management of the sport fishery may also be based on the best catch and effort information currently available to the department;

(4) the bag, possession and annual limits, and harvest recording requirements for king salmon are those specified for fresh waters in 5 AAC 64.022 and 5 AAC 64.025.

(c) The sport fishery will be managed as follows:

(1) if the department projects the BEG will be achieved, a harvest will be allowed under the provisions of 5 AAC 64.022 through 5 AAC 64.030;

(2) if the department projects the BEG will not be achieved but that the OEG will be achieved, the commissioner shall allow, by emergency order, a catch and release-only fishery for king salmon with the following provisions:

(A) only artificial lures may be used, with not more than one single, barbless hook with gap between point and shank one-half inch or less, attached directly to the lure;

(B) all king salmon caught must be released immediately without being removed from the water;

(3) if the department projects neither the OEG or BEG will be achieved, the commissioner shall close, by emergency order, the sport fishery for king salmon.

Karluk River King Salmon Escapement and Surrounding Area Harvests

YEAR	ESCAPE ¹	Karluk River Sport Harv.	I & O ² KARLUK SECTION	NW DIST. PURSE SEINE ³	NW DIST. GILLNET ³	AREA COMM ⁴	AVE. WEIGHT	AREA SALT SPORT HARV ⁵
1980-89	7,650							
1990	13,742	700	0	-	-	-	-	
1991	12,423	1,599	0	654	250	22,234	12	
1992	8,745	856	264	2,092	1,502	24,299	14	
1993	12,310	1,634	3,082	3,910	3,660	41,029	12	
1994	10,566	1,483	5,114	3,569	1,579	22,576	14	
1995	11,373	1,284	1,794	2,370	1,576	18,704	14	
1996	8,356	1,695	1,662	868	1,940	13,071	14	
1997	11,869	1,574	1,445	702	1,505	18,728	10	
1998	9,066	1,173	252	1,874	1,761	17,341	14	2,519
1999	11,297	1,766	1,067	758	1,197	18,299	13	4,097
2000	7,879	2,581	693	1,178	942	12,293	15	6,167
2001	3,149	1,304	2,588	1,085	1,955	23,827	14	5,576
2002	6,574	716	1,262	3,158	2,071	19,263	10	4,561
2003	6,965	563	1,336	3,685	2,137	18,531	10	8,024
2004	6,805	690	2,249	3,551	3,751	28,899	11	9,787
2005	4,611	363	349	2,382	2,713	14,411	12	8,278
2006	3,351	670	900	2,693	3,789	20,283	10	10,333
2007	1,609	205	313	1,602	1,357	17,222	10	10,626
2008	752	0	13	6,214 ⁶	1,122	17,176	8	9,408
2009	1,306	0	0	324	173	7,219	9	8,773
2010	2,917	0	0	510	293	14,550	8	NA

- 1 Number of spawning fish (weir count – sport harvest above weir)
- 2 Inner and Outer Karluk Sections of the SW. District. Legal Gear is purse seine.
- 3 Data from commercial fisheries division fish ticket run 11/17/10. North West District, stat areas used: all 253s, all 254s and 259-30-39 only. Dates are from June 1-July 15. NW District includes waters between Termination and Rocky Point
- 4 Kodiak Area commercial king harvest. Inner and Outer Karluk Sections and NW district harvest figures are included in the area harvest
- 5 Kodiak Area Saltwater King Harvest. Most of the harvest occurs in Chiniak Bay, adjacent to the town of Kodiak.
- 6 These fish averaged 6 pounds.

Karluk River King Salmon Escapement and Surrounding Area Harvests

YEAR	ESCAPE ¹	Karluk River Sport Harv.	I & O ² KARLUK SECTION	NW DIST. PURSE SEINE ³	NW DIST. GILLNET ³	AREA COMM ⁴	AVE. WEIGHT	Karluk Early Sockeye Escape
1990	13,742	700	0	-	-	-	-	
1991	12,423	1,599	0	654	250	22,234	12	
1992	8,745	856	264	2,092	1,502	24,299	14	
1993	12,310	1,634	3,082	3,910	3,660	41,029	12	
1994	10,566	1,483	5,114	3,569	1,579	22,576	14	
1995	11,373	1,284	1,794	2,370	1,576	18,704	14	
1996	8,356	1,695	1,662	868	1,940	13,071	14	
1997	11,869	1,574	1,445	702	1,505	18,728	10	Sockeye
1998	9,066	1,173	252	1,874	1,761	17,341	14	Goal
1999	11,297	1,766	1,067	758	1,197	18,299	13	110-250
2000	7,879	2,581	693	1,178	942	12,293	15	
2001	3,149	1,304	2,588	1,085	1,955	23,827	14	337,000
2002	6,574	716	1,262	3,158	2,071	19,263	10	453,000
2003	6,965	563	1,336	3,685	2,137	18,531	10	448,000
2004	6,805	690	2,249	3,551	3,751	28,899	11	389,000
2005	4,611	363	349	2,382	2,713	14,411	12	268,000
2006	3,351	670	900	2,693	3,789	20,283	10	201,000
2007	1,609	205	313	1,602	1,357	17,222	10	279,000
2008	752	0	13	6,214 ⁶	1,122	17,176	8	82,000
2009	1,306	0	0	324	173	7,219	9	52,000
2010	2,917	0	0	510	293	14,550	8	70,000

CURRENT ADFG MANAGEMENT

Commercial Fisheries:

Purse Seine: Inner and Outer Karluk: EO when king goal not going to be achieved: release big fish, sell fish under 28"

Set net and Purse seine out side Inner and Outer, when king goal not going to be achieved: no restrictions

Sport Fisheries:

When king goal is not going to be achieved, close the sport fishery (Emergency Order Powers do not allow for a catch and release fishery if the hooking mortality will lower the number of spawning fish below the goal.

2010

Kodiak King Salmon Sport Fisheries

“WITHOUT” Optimal Escapement Goal (OEG)

Karluk River

CLOSED ALL SEASON

Goal = 3,600 – 7,300

2010 Escapement = **2917**

Ayakulik River

CLOSED June 26-July 7

Goal = 4,800 – 9,600

2010 Escapement = **5,310**

“WITH” Optimal Escapement Goal (OEG)

OPEN ALL SEASON

Goal = 3,600 – 7,300

2010 Escapement = **2817***

OPEN ALL SEASON_(c/r 12 days)

Goal = 4,800 – 9,600

2010 Escapement = **5,210****

*81 fish is estimated hooking mortality related to fishing all season long under catch and release restrictions (no bait, can not remove fish from water). Figures used to estimate hooking mortality: catch of 1,153 (same catch as 2006, when there were 30% more fish in the river and bait was allowed) with a 7% hooking mortality. $1,153 \times 7\% = 81$ fish

** no more than 100 fish hooking mortality during catch/release fishery June 26-July 7

Kodiak Fish & Game Advisory Committee

RC 10

December 16 & 17 2010-KNWRVC

Oliver Holm Chairman

(Minutes represent a paraphrased summary of the KAC, department staff and public comments and are not a verbatim transcript of the meeting. Tapes of the meeting are available for review by contacting the committee secretary)

Call to order: 7:10pm at the KNWR Visitors Center

Roll call: A quorum was achieved with the following members present: Oliver Holm, Don Fox, Kip Thomet, Julie Kavanaugh, Ron Kavanaugh, Tuck Bonney, Paul Chervenak, Rick Berns (for Al Cratty), Theresa Peterson for Pete Hannah, Alexis Kwachka), Andy Finke, ~~Thomet~~ Thomet, Rolan Ruoss, Curt Waters, Duncan Fields

Excused absences: Lou Dochtermann.

ADF&G Staff: Don Tracy, James Jackson, Geoff Spalanger, Joe Dinnocenzo and Jeff Wadle.

USFWS: Bill Pyle and Kevin Van Hatten.

Audience: 12.

Approve Agenda: Motion to adopt agenda passed unanimously.

Approve Minutes of previous meeting: Minutes of our meeting of February 24th 2010 were approved unanimously.

Correspondence: E-mails from Richard Blanc and Rick Ellingston containing their comments on several salmon proposals.

Chair Announcements: None.

Old Business: None.

New Business:

- 1) **Sport fish proposals:** Committee discussion and action on sport fish proposals.
- 2) The advisory committee discussed formation of a workgroup to discuss the possible listing of the Karluk Chinook Salmon as a stock of concern by the BOF. The committee will discuss it December 17th at our 9am ground fish proposals meeting.
- 3) **Commercial fin fish proposals:** The department give a preliminary forecast report for the 2011 salmon season then the advisory committee discussed and took action on fin fish proposals.
- 4) **Adjourn:** The committee adjourned till 9am the following day when it would meet to discuss and take action on ground fish proposals and form a Karluk salmon workgroup.

**December 17th 2010
KNWRVC**

Call to order: 9:00am. A quorum was noted with 14 committee members present. Chris Fiala filled in for Rolan Ruoss.

ADF&G staff: Nick Sagalkin, Don Tracy and retired sport fish biologist Len Swartz.

KRAA: Kevin Brennan.

USFWS: Kevin van Hatten.

Old Business:

- 1) Karluk work group was formed and would meet several times next week before bringing their recommendations to a Sunday January 9th 2011 meeting of the advisory committee at the KNWRVC. Duncan Fields would be the chair and Len Swartz secretary. Other members were Kip Thomet(setnet), Oliver Holm(purse Seine), Mike or Tim Carlson(sport fish), Chris Fiala or Chuck Pearman(salt water charter), Andre Finke(subsistence), Charlie Powers(native corporation/land owner), Duncan Fields(advisory committee), Curt Waters(trawl), Kevin Brennan(KRAA), Len Swartz(secretary), Don Tracy(ADF&G sport fish), Jeff Wadle(ADF&G commercial fish) and Kevin van Hatten(USFWS).

New Business:

- 1) Ground fish proposals were discussed and acted upon.
- 2) KAC chairman Oliver Holm was selected to represent the advisory committee at the January 11th-14th 2011 BOF meeting to be held in Kodiak.
- 3) January 12th 2011 would be the date set for the committee to hold elections and discuss and take action on Kodiak Area game proposals. The meeting would be at 7pm at the Harbor Visitors and Convention Center. The BOF will be letting us use their meeting room.

Adjourned at 1:45pm

Ground fish, commercial fin fish and sport fish proposals follow in numerical order not in the order they were discussed and acted on in a format recommended by regional coordinator Sherry Wright. The format makes it easier for the BOF to follow.

BOF KODIAK GROUND FISH PROPOSALS

Proposal 52

ACTION: Fails 11 opposed---2 support---1 abstained.

Description: Close state waters of Sitkalidak Strait south of a line from Left Cape to Cape Barnabas and north of a line from Cape Kasiak to Black Point to pelagic trawling.

Amendment: A amendment to close trawling from August 1st to October 15th failed on a 8 opposed and 2 support vote.

Discussion: Proposal 52 and 53 were discussed by the committee for over 3hrs.

Minority: Agreed with KAC member Mr. Berns (who represents Old Harbor/Akihok) that the area in question was a subsistence area for the village and that after the trawl fleet left the area local residents found it harder to find fish for subsistence and that it took several weeks for halibut to return.

Committee member Mr. Waters who represents the trawl fleet on the KAC said that the trawl fleet mainly fishes the area in question when adverse weather forces the fleet into calmer waters. He felt that if they could meet with local residents in the village they would get a better understanding of the fishery it would help alleviate their concerns.

Majority: Agreed with chairman Holm that the by catch numbers provided by the department showed no by catch concern.

Proposal 53

ACTION: Fails 11 opposed -3 support.

Description: Close state waters in Marmot Bay to pelagic trawling.

Amendment: Amendment to close state waters in a 3 mile circle around Spruce Island failed on a 11 opposed and 3 support vote.

Discussion:

Staff comments: 30-50% of the harvest comes from the Marmot area.

Committee comments:

Minority: KAC member Mr. Fields had deep concerns about chinook by catch. He also noted that the residents of Ouizinke who fish for chinook in the area on a year round basis have noticed a steep decline in chinook numbers.

Majority: Although the majority also had concerns about by catch they agreed with Mr. Kwachka that the closure along with the Sea Lion Zone would effectively shut down the area to pelagic trawling. Mr. Bonney also noted that his cannery would lose 15-20 days of processing if the area was closed.

After a lengthy discussion a motion was made and passed to have the committee send a letter to the BOF requesting that the board write a letter to the NPMC. Enclosed with our minutes is a draft of the letter.

Proposal 54

ACTION: Passes unanimously 14-0.

Description: Amend rockfish management plan.

Amendment: None.

Discussion:

Staff comments: Current black rockfish regulations create confusion as they allow for multiple harvest types(directed, incidental and by catch) trip limits, and by catch levels within the fishery. The proposed management plan simplifies regulations by creating an single directed black rockfish fishery with clearly specified trip limits and allow non-directed black and dark rockfish harvest with various by catch limits rather then trip limits.

Committee comments: Agree with and support staff comments.

Proposal 55

ACTION: Passes as amended 14-0.

Description: Define gear for harvesting lingcod.

Amendment: KAC amendment-- (g) Ling cod by catch for mechanical jigging and hand troll is 20%.

Discussion:

Staff comments: Legal gear is undefined for directed ling cod fisher. This proposal would put into regulation what gear is legal.

Committee comments; Agreed with staff comments but amended the proposal to allow for a 20% by catch in the mechanical jigging and hand troll fishery.

Proposal 56

ACTION: Proposal as amended passes 14-0.

Description: Repeal use of a single continuous line with not more than 150 hooks as lawful mechanical jigging gear.

Amendment: KAC amended to allow for a continuous line with no more than 150 hooks as lawful gear in the pacific cod fishery.

Discussion:

Staff comments: Felt that a single continuous line with not more than 150 hooks should be repealed because it created confusion and was inconsistent with current fishing practices.

Committee comments: After discussion with several jig fisherman in the audience who stated that fishing for pacific cod in deeper waters they would need to be able to have the continuous line with 150 hooks the KAC amended the proposal to allow for the practice.

Proposal 57

ACTION: Passes 14-0.

Description: Modify fishing season for ground fish to be taken only during seasons established by emergency order or under a permit issued by the commissioner.

Amendment: None.

Discussion:

Staff comments: House keeping proposal that cleans up regulation to avoid confusion.

Committee comments: Agree with and support staff comments.

BOF KODIAK HERRING PROPOSALS

Proposal 58

ACTION: Proposal passes 14-0.

Description: Allow mechanical jigging and hand troll gear to be used under the herring bait permit with an annual limit of 1000lbs.

Amendment: None.

Staff comments: No conservation concerns the department could reduce catch by EO.

Committee comments: Not many people do it. There is a large biomass available. Possible way to get bait.

BOF KODIAK SUBSISTENCE SALMON PROPOSALS

Proposal 59

ACTION: Passes 14-0.

Description: Allow use of dip nets at the lower mouth of Settler's Cove Creek at Port Lions from June 1st - July 30th.

Amendment: None.

Discussion:

Staff comments: No conservation concerns.

Committee comments: Good way to catch subsistence fish.

Proposal 60

ACTION: Passes 14-0.

Description: Change finfish reporting requirements for owner, operator or employees of a lodge, charter vessel or similar enterprise and do not allow use of sport fish guide or charter vessel operator gear in a subsistence fishery when the vessel is being operated as a charter.

Amendment: None.

Discussion:

Staff comments: Support proposal because it prevents abuse of subsistence resource.

Committee comments: Agree with staff and also felt the subsistence resource was not intended to supply clients with fish.

Proposal 61 & 62 (discussed and acted on together) ACTION: Passes 12-2.

Description: Require subsistence caught fish be recorded on the permit before leaving the fishing site.

Amendment: None.

Discussion:

Committee comments: Its easier to record your catch on the permit when leaving the area rather than as each is caught.

Minority: Felt the word site was to ambiguous.

BOF KODIAK COMMERCIAL SALMON PROPOSALS

Proposal 63

ACTION: Proposal fails 14-0.

Description: Prohibit a person who registers to fish a salmon permit in one area from crewing in another salmon area in the same year.

Amendment: None.

Discussion:

Committee comments: Some committee members felt that it would be more appropriate to be taken up as a statewide proposal. It was felt that the proposal was too restrictive and penalizes the honest fisherman who fishes one area and crews in another area to make some extra money in a bad season. It was noted that quite a few west side set-netters went to Bristol Bay to crew in June and came back in July to fish their Permits. This was because of the low prediction for early run Karluk sockeye and the anticipation of limited catches and fishing time in the June sockeye fishery.

Proposal 64

ACTION: Proposal fails 14-0.

Description: Allow for pink salmon harvest from August 15th-24th on Kodiaks West Side.

Amendment: None.

Discussion:

Staff comments: Department is opposed to proposal on biological concerns for the late run Karluk sockeye salmon run. Lacks resources to manage the late run fishery.

Committee comments: Agree with staff comments and that the department has the flexibility to manage the fishery now. Its not perfect but it works well.

Proposal 65

ACTION: Proposal fails 14-0.

Description: Allow for set gillnet fishing after August 15th if escapement goals are met in the NW Kodiak Districts.

Amendment: None.

Discussion:

Staff comments: The department is neutral on the allocative issues of allowing only one gear type fishing time in an area where all gear types can legally fish. The department is **OPPOSED** to harvesting any sockeye or pink salmon if returns are less than the lower escapement goal and also opposed to creating unusually complicated and burdensome management plans.

Committee comments: Support staff comments and are also opposed because of the allocation issue of only allowing one gear type to fish.

Proposal 66

ACTION: No action taken

Description: Liberalize pink salmon harvest regulations from August 15th-24th on Kodiaks West side.

Amendments: None.

Discussion:

Committee comments: The maker of the proposal withdrew it so no action was taken.

Proposal 67

ACTION: Proposal fails 14-0.

Description: Amend Westside Kodiak Management Plan to include minimum escapement goals in the major sockeye systems of Olga Bay.

Amendment: None.

Discussion:

Staff comments: Neutral on the allocation aspects of proposal but **OPPOSED** to any changes to the Westside Management Plan that would inhibit the departments ability to control NW and SW Kodiak District salmon escapements.

Committee comments: Support staff comments and also agreed with KAC member Mr. Fields that there were no accurate stock separation studies, shutting down the west side to manage for Olga Bay could cause over escapement in the Karluk system and that the department needs the flexibility to manage for all the systems.

Proposal 68

ACTION: Proposal fails on a 7-7 tie Vote.

Description: Amend (e)(1) in the Inner Karluk Section Management Plan to "achieve" rather than "exceed" early run escapement goal.

Amendment: An amendment to say: department determines that early run escapement goal is achieved ---fails 10 opposed- 3 for-1 abstained.

Discussion:

Committee comments:

Proponents of the proposal felt that adoption would give the department flexibility to open early enough to avoid over escapement as has happened in the past.

Opponents felt that adoption would/could reallocate between set-net and seine fisherman especially if weather or tidal conditions cause the fish to back out of the terminal area in Inner Karluk and be over harvested by the seine fleet. The resulting over harvest could result in the shutting down of the June sockeye fishery till further escapement warranted an opening.

Proposal 69

ACTION: Proposal fails 10-4

Description: Create new regulation to make power and/or hand troll fishing legal gear in the Kodiak Management Area.

Amendment: None.

Discussion:

Staff comments: Neutral on allocation issues but **OPPOSED** on biological grounds.

Committee comments:

Proponents felt that it would offer new opportunities for salmon fisherman.

Opponents support department concerns and also felt that it would create a new mixed stock fishery which isn't allowed under the Sustainable Fisheries Policy followed by the BOF. There would be a reallocation from an already fully utilized fishery. Anyone in the state with a valid CEFC troll permit would be allowed into the Kodiak Management area. There also was concerns about Chinook by catch mortality.

Proposal 70

ACTION: Proposal fails 14-0.

Description: Define "attending a fish site" in regulation.

Amendment: None.

Proposal 70(continued)

Discussion:

Staff comments: Department is **OPPOSED** to the suggested language that require a permit holder to **only** remain in the district. It would make enforcement of this regulation impossible.

Committee comments: Agree with and support staff comments. This proposal would also be open to abuse.

Proposal 71

ACTION: Proposal fails 10-4.

Description: Make set gillnet proposal allowing for dual permits permanent.

Amendment: None.

Discussion:

Committee comments:

Proponents Felt that it has benefitted some set netters especially those with multiple permit family operations. It has increased the value of permits. It has allowed fisherman to survive economically in years of low salmon returns.

Opponents a majority of KAC members felt that it decreased opportunities for new people getting into the fishery and negatively affected crew member employment as people were hiring less crew. Permit stacking was meant to reduce gear in an over capitalized fishery not consolidate into fewer hands. This proposal only benefits multiple permit holders. Permits were only intended to be owner operated under the original limited entry concept.

Proposal 72

ACTION: Proposal passes 14-0.

Description: create Pillar Creek special harvest area in all waters of Monashka Bay south of 57°49.60" N Lat.

Amendment: None.

Discussion:

Staff comments: This special harvest area would allow harvest of hatchery produced coho salmon.

KRAA comments: Kevin Brennan KRAA manager said that there were no approved projects at this time but they wanted to get some discussion at this time.

Committee comments: Support staff and KRAA comments and felt this would allow cost recovery for the aquaculture association at some future date.

Proposal 73

ACTION: Proposal passes 14-0.

Description: Create Dry spruce Bay special harvest area in all waters of Dry Spruce Bay south of 57°55.62" N Lat.

Amendment: None.

Discussion: KAC would like to reference comments on proposal 72 as they also apply here.

Proposal 74

ACTION: Proposal fails 14-0.

Description: Amend closure times in the Alitak District Salmon Management Plan.

Amendment: None.

Discussion:

Staff comments: Proposal would increase fishing time by 12hrs(change from days to hours).

Proposal 74(continued)

Committee comments: KAC members agreed with Mr. Fields that the way the openings are synchronized any changes even ever so slight would be cause for future problems. The management plan is balanced the current plan being developed over a long period of time no change was warranted.

Proposal 75

ACTION: No action taken.

Description: Close fishing for Chinook salmon in the Mainland District until escapement goals are met.

Amendment: None.

Discussion:

Staff comments: Department **OPPOSED** the current regulations to conserve Chinook salmon stocks in management areas in close proximity to spawning streams are more effective. Department has no stock separation program.

Committee comments: Support staff comments . The committee voted to take no action at this time and would discuss at the BOF meeting in board committee.

Proposal 76

ACTION: Proposal passes 14-0.

Description: Amend subsection (f) in the Pauls Bay Section Management Plan .

Amendment: None.

Discussion:

Staff comments: Due to budget restraints there hasn't been a weir since 2004. This is a housekeeping proposal that eliminates interim escapement goals. Will be monitored by aerial survey.

Committee comments: Agree with and support staff comments.

Proposal 77

ACTION: Proposal passes 14-0.

Description: Amend closed water regulations and add a new paragraph.

Amendment: None.

Discussion:

Staff comments: Department housekeeping proposal.

Committee comments: Agree with and support staff comments.

Proposal 78

ACTION: Proposal passes 14-0.

Description: Amend (a)(3) in the Alitak District Salmon Management Plan.

Amendment: None.

Discussion: This is a housekeeping proposal that clarifies language in regulation.

Committee comments: Agree with and support staff comments.

BOF KODIAK SPORT FISH PROPOSALS

Proposal 79

ACTION: Proposal passes 13-1.

Description: Close Kalsin Pond outlet to sport fishing.

AND

Proposal 80(Proposals 79 & 80 were discussed and acted on together)

Description: Close Kalsin Pond outlet stream to sport fishing within 200ft of Chiniak Highway.

Amendment: None.

Discussion:

Staff comments: Department supports any instance to establish a fishery and public safety's ability to enforce regulations. Department neutral on allocation issues.

Committee comments:

Opponents Felt it made an exclusive area for tubers and there was no biological reason for the proposal.

Proponents KAC felt the closure would make snagging regulations more enforceable and the local people who live and fish the area supported it.

Proposal 81

ACTION: Proposal as amended passes 13-1.

Description: Open the American and Olds Rivers to king salmon fishing.

Amendment: KAC offered an amendment changing September 15th to August 15th to protect coho stocks.

Discussion:

Proponents voted to change the date of closure to August 15th to protect coho stocks.

Opponents wanted to protect coho's.

Proposal 82

ACTION: Proposal as amended passes 14-0.

Description: Reduce the rockfish bag limit from 10 per day, 20 in possession to 5 per day, 10 in possession.

Amendment: KAC amended the proposal to : reduce limit to 7 per day, 14 in possession 2 of which may be yellow eye.

Discussion:

Staff comments: Department had concerns about the increased harvest from 7,000 to 16,000(approx. 40,000lbs) most of the increase due to guided sport anglers. The department has no stock assessments but hasn't seen a change in age class due to increased harvest.

Committee comments: The advisory committee after discusses with staff and fish guides who were in the audience who wanted a larger limit then the proposal requested because of lower amounts of salmon available offered an amendment. As there hasn't been a decrease in rockfish stocks the KAC opted for a daily limit of 7 and 14 in possession.

BOF CHIGNIK GROUND FISH PROPOSALS

Proposal 84

ACTION: Proposal fails 13-0-1 abstained.

Description: Modify Pacific Cod Fishery Registration as follows:

Add state and parallel fisheries to 5 AAC 28.506 CHIGNIK AREA REGISTRATION SECTION (b).

Amendment: None.

Proposal 84(continued)

ACTION: Proposal fails 14-0.

Discussion:

Committee comments: KAC members agreed with committee member Mr. Kavanaugh that adoption of this proposal would disenfranchise 7 boats 6 of which fish in the area are from Kodiak. If you fish any other area for cod then under this proposal you couldn't participate in the Chignik fishery. The 6 Kodiak boats are long time participants in the Chignik fishery catching a large percentage of the cod catch. Reallocation from these vessels would change long time fishing practices.

KODIAK FISH & GAME ADVISORY COMMITTEE
211 MISSION ROAD
KODIAK, AK 99615

RC 11

December 17, 2010

Alaska Board of Fisheries
Box 115526
Juneau, AK 99811

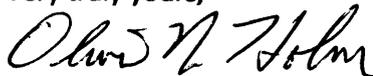
Re: Recommendation Regarding Proposed North Pacific Fisheries Management
Council Actions on Chinook Salmon Bycatch

Dear Chairman Webster and Board Members:

The Kodiak Advisory Committee met for over 3 hours to discuss the two Chinook salmon bycatch proposals (52 & 53) that are before the Alaska Board of Fisheries this cycle in Kodiak. The issues associated with these proposals were thoroughly discussed in detail by the diverse and knowledgeable members of the Kodiak Advisory Committee representing various gear types and industry stakeholders. The Committee expressed great overall concern about the status of Chinook salmon stocks in the Gulf of Alaska. Nevertheless, the Committee had sharp disagreements regarding the merits of the two current proposals before the Board. Despite this disagreement, the Committee was unanimous in its support of the proposed North Pacific Fisheries Management Council's action in December to energize and implement a mandatory Salmon Bycatch Control Cooperative as well as "caps" and increased observer coverage for the Gulf of Alaska trawl fleets and .

Consequently, the Kodiak Advisory Committee strongly recommends that the Alaska Board of Fisheries write a letter to the NPFMC indicating the Board's support for the Council's recent Chinook Salmon Bycatch reduction motion, inclusive of the mandatory salmon bycatch control cooperative, increased observer coverage and discussion of a hard cap to be implemented, if possible, for the 2012 trawl season. Early implementation is a priority for the Kodiak Advisory Committee. The Committee further encourages the Board to indicate their support for the Council's longer term motion provisions which provide additional management tools to limit and control Chinook bycatch for both the pollock and remaining groundfish trawl fisheries. It is essential, in the Committee's view, that the Board of Fisheries work cooperatively with the NPFMC to limit Gulf of Alaska Chinook bycatch.

Very truly yours,



Oliver Holm, Chairman

RC 12

Kodiak Fish & Game Advisory Committee

January 9th 2011-KNWRVC

Oliver Holm Chairman

(Minutes represent a paraphrased summary of the KAC, department staff and public comments and are not a verbatim transcript of the meeting. Tapes of the meeting are available for review by contacting the committee secretary)

Call to order: 2:20pm at the KNWR Visitors Center

Roll call: A quorum was achieved with the following members present: Oliver Holm, Don Fox, Kip Thomet, Julie Kavanaugh, Pete Hannah, Alexis Kwachka), Duncan Fields, Chris Fiala for Rolan Ruoss and Charles Powers for Andrew Finke.

Excused absences: Lou Dochtermann, Ron Kavahaugh, Rolan Ruoss, Paul Chervenak and Rick Berns.

ADF&G Staff: Don Tracy, James Jackson, Geoff Spalanger, Joe Dinnocenzo and Jeff Wadle and retired biologist Len Swartz

USFWS: Kent Sundseth.

Audience: 1.

Approve Agenda:

Approve Minutes of previous meeting: Minutes of our meetings of December 16th & 17th 2010 were approved unanimously.

Correspondence: Letter from Ron Kutchick concerning Monashka Bay Chinook salmon.

Chair Announcements: None.

Old Business:

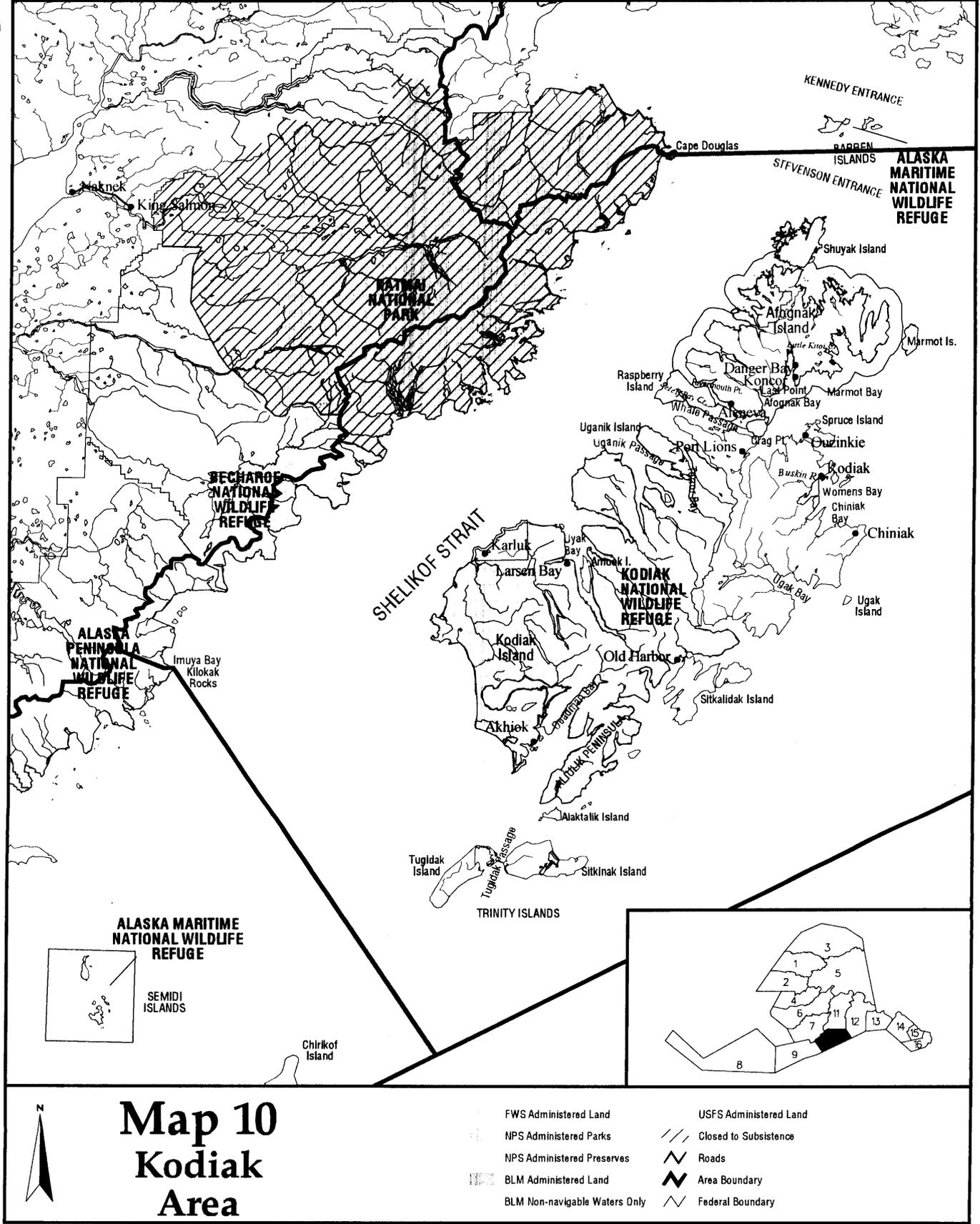
- 1) **Letter to BOF:** Mr. Fields draft letter approved unanimously 9-0. The letter will be submitted to the board as an RC by Mr. Fox prior to the start of the BOF meeting.

New Business:

- 1) **Discussion and action on KAC subcommittee stakeholders meeting:** The advisory committee adopted the following workgroup recommendations.
 - a). Forward the Koniag proposal with two options A and B.
ACTION: Passes unanimously, 9-0.
 - b). Adopt the committee Research/Management Plan.
ACTION: Passes unanimously, 9-0.

p 1 of 2

Kodiak Area Subsistence Fishing

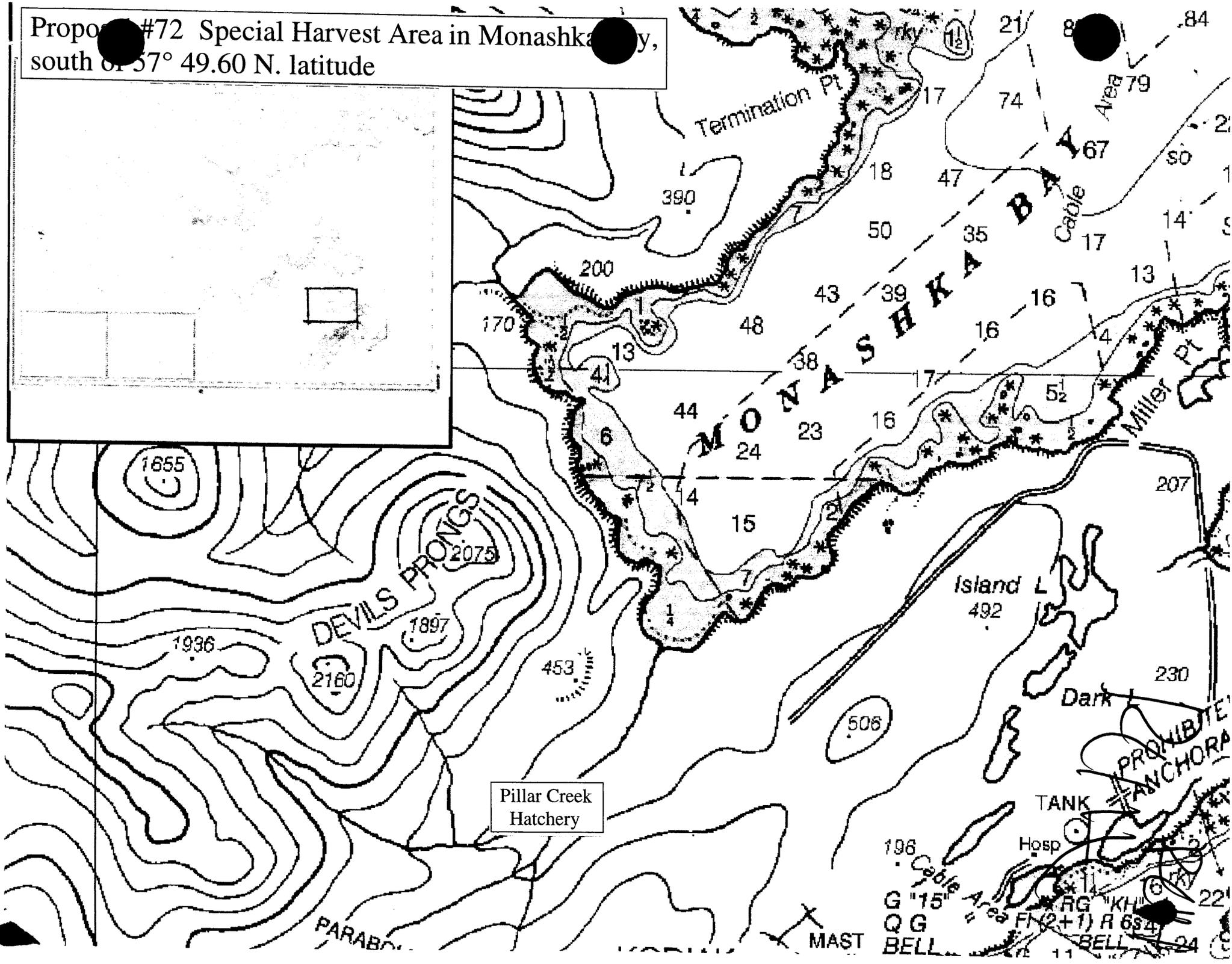
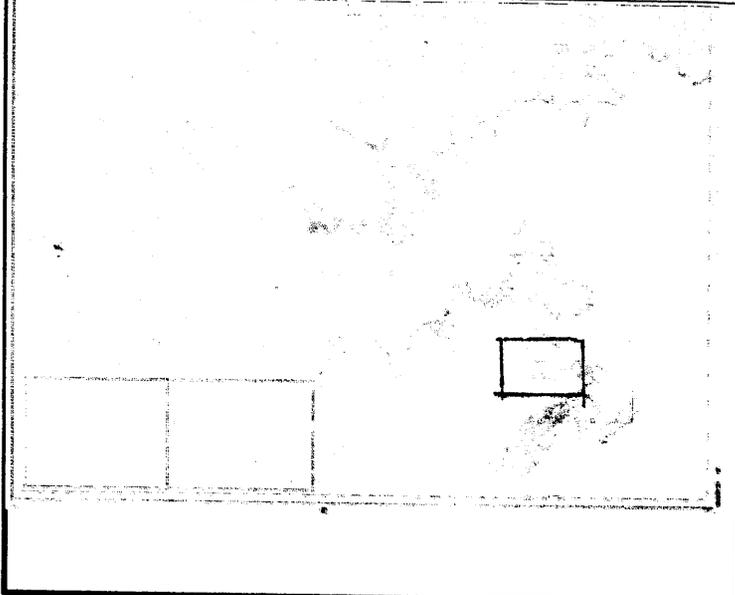


**Map 10
Kodiak
Area**

- | | |
|-------------------------------|------------------------|
| FWS Administered Land | USFS Administered Land |
| NPS Administered Parks | Closed to Subsistence |
| NPS Administered Preserves | Roads |
| BLM Administered Land | Area Boundary |
| BLM Non-navigable Waters Only | Federal Boundary |

Kodiak Area

Proposed #72 Special Harvest Area in Monashka Bay,
south of 57° 49.60 N. latitude



**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

BOARD OF FISHERIES REGULATIONS

- Fishing Area
 Subsistence Personal Use
 Sport Commercial

JOINT BOARD REGULATIONS

- Advisory Committee Regional Council Rural

BOARD OF GAME REGULATIONS

Game Management Unit (GMU) _____

- Hunting Trapping
 Subsistence Other _____

- Resident
 Nonresident

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

1. Alaska Administrative Code Number 5 AAC 40.085 (a) xx **Regulation Book Page No.** 631

2. What is the problem you would like the Board to address?

Designate a new "Special Harvest Area" (SHA) within the Kodiak Management Area. This proposal asks the Board of Fisheries to designate a new SHA in the nearshore waters adjacent to the Pillar Creek Hatchery within the Northeast Kodiak District in Monashka Bay.

3. What will happen if this problem is not solved?

The Board of Fisheries may designate a SHA in segregated waters near a salmon hatchery release site, to allow the private non-profit hatchery permit holder to harvest salmon hatchery returns (5AAC 40.005(c)). The Kodiak Regional Aquaculture Association (KRAA) has a permitted hatchery at Pillar Creek at the head of Monashka Bay. The KRAA Board of Directors has discussed the option of increasing the release of hatchery produced coho salmon at Pillar Creek to enhance common property commercial fisheries and increase sport, subsistence and cost recovery fishing opportunities. If no SHA is designated, KRAA cannot proceed with additional coho production.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

AAC 40.085 (a) (6). Pillar Creek Special Harvest Area: All waters of Monashka Bay south of 57° 9.60' N. lat.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

No.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted?

Kodiak Area salmon fishermen (commercial, subsistence, and sport).

B. Who is likely to suffer if your solution is adopted?

No one.

7. List any other solutions you considered and why you rejected them.

ADF&G may designate Special Harvest Areas by emergency order, but this process allows more opportunity for public comment.

DO NOT WRITE HERE

Submitted By: Name _____

Individual or Group

Center Street; Suite 200

Kodiak, Alaska

99615

Address

City, State

ZIP Code

907-942-3384 (cell)

907-486-6555

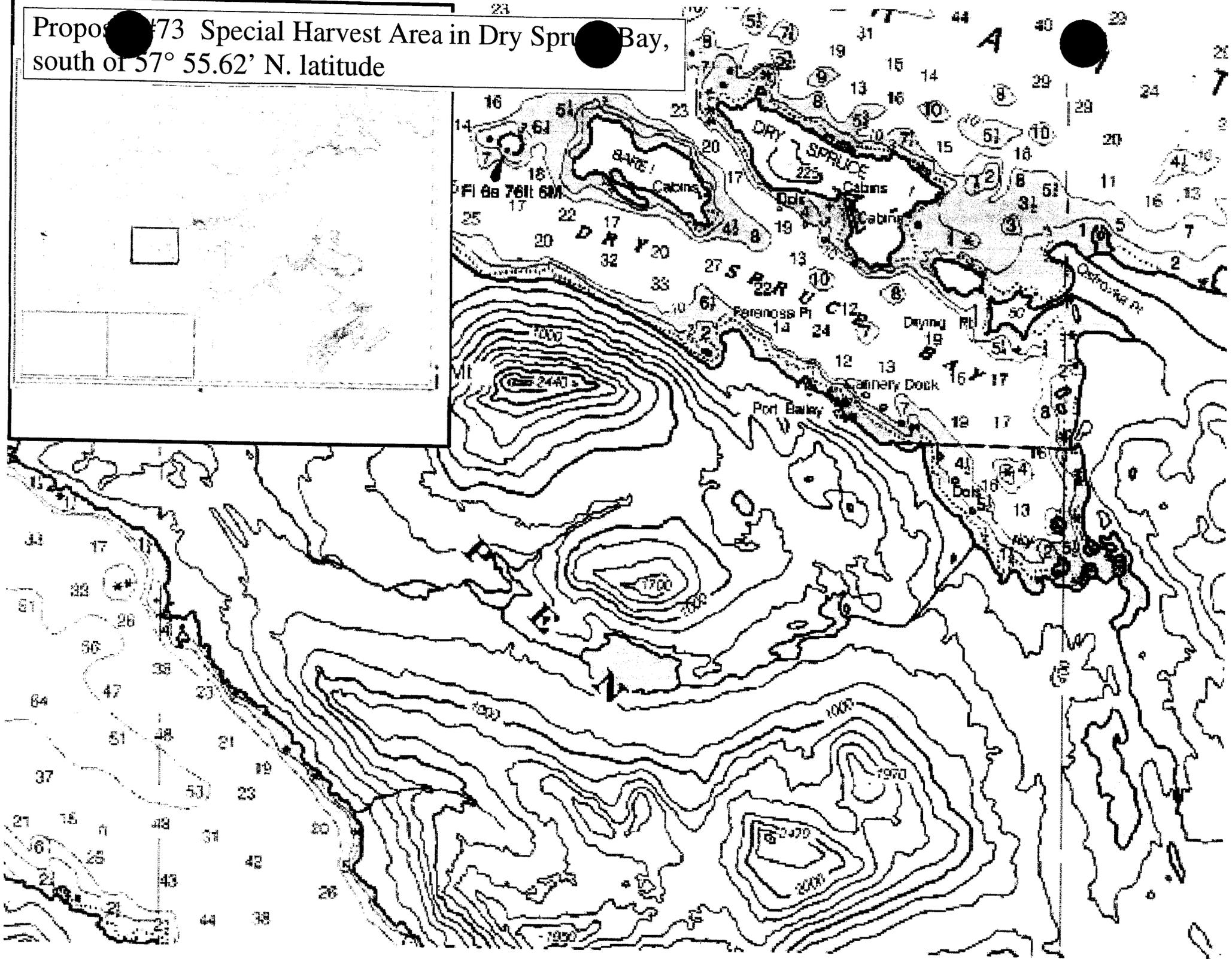
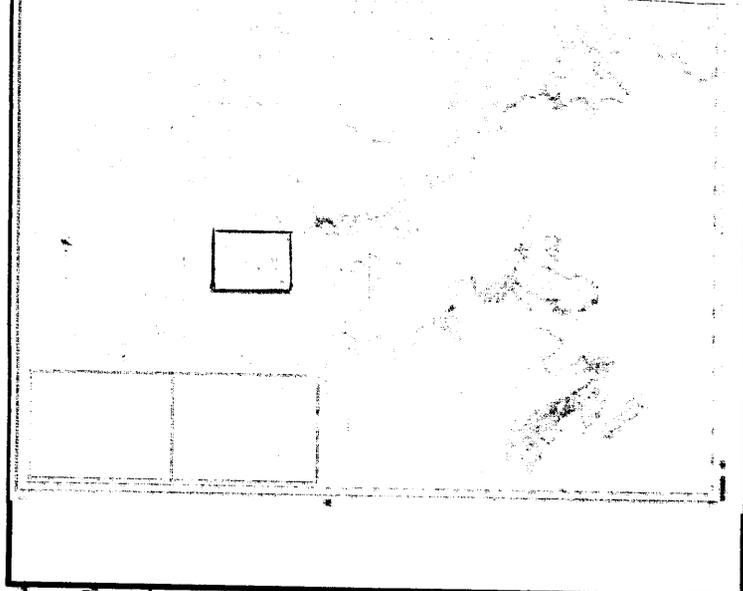
kraa@gci.net

Home Phone

Work Phone

Email

Proposed 1973 Special Harvest Area in Dry Spruce Bay,
south of 57° 55.62' N. latitude



**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

BOARD OF FISHERIES REGULATIONS

- Fishing Area
 Subsistence Personal Use
 Sport Commercial

JOINT BOARD REGULATIONS

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BOARD OF GAME REGULATIONS

Game Management Unit (GMU) _____

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1. Alaska Administrative Code Number 5 AAC 40.085 (a) xx Regulation Book Page No. 631

2. What is the problem you would like the Board to address?

Designate a new "Special Harvest Area" (SHA) within the Kodiak Management Area. This proposal asks that the Board of Fisheries designate a new SHA in Dry Spruce Bay within the Northwest Kodiak District.

3. What will happen if this problem is not solved?

The Board of Fisheries may designate a SHA in segregated waters near a salmon hatchery release site, to allow the private non-profit hatchery permit holder to harvest salmon hatchery returns (5AAC 40.005(c)). The Kodiak Regional Aquaculture Association (KRAA) Board of Directors have discussed Dry Spruce Bay as a potential release site for hatchery produced salmon. One step in the process is to designate the release site as a SHA, to allow for cost recovery or mop-up fisheries, should those be needed. If no SHA is designated, KRAA cannot proceed with salmon enhancement projects in this location.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

5 AAC 40.085 (a) (7). Dry Spruce Bay Special Harvest Area: All waters of Dry Spruce Bay south of 55° 55.62' N. lat.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

No.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted?

Kodiak Area salmon fishermen (commercial, subsistence, and sport).

B. Who is likely to suffer if your solution is adopted?

No one.

7. List any other solutions you considered and why you rejected them.

ADF&G may designate Special Harvest Areas by emergency order, but this process allows more opportunity for public comment.

DO NOT WRITE HERE

Submitted By: Name _____

Individual or Group

Address _____

Kodiak, Alaska

99615

City, State

ZIP Code

907-942-3384 (cell)

907-486-6555

kraa@gci.net

Home Phone

Work Phone

Email

1/11/2011

Hello Mr. Chairman, members of the board. Thank you allowing me the time today to share my concerns with you. My name is Bryan Ellsworth and I'm a permit holder in the commercial salmon setnet fishery on the Westside of Kodiak in Uganik Bay.

The first proposal that I'd like to address is Proposal 68 allowing the opening of the Inner Karluk section.

Unfortunately, I believe that this proposal could unintentionally create serious allocation issues between the setnet and seine fleets. Setnet fishermen depend on adequate fishing opportunities to have the chance to intercept passing salmon. This proposal could allow the Department to manage escapement by relying on a terminal seine fishery instead of the traditional equal opportunity mixed gear fishery. Additionally, the nature of the Karluk River system has caused problems for management in the past. Every year, the setnet fleet is told by management that even though the Department anticipates achieving the escapement goals, the Northwest District cannot be opened because the sockeye holding in the Karluk lagoon have the potential to back out and return to the ocean before making their push past the weir. These back out events put the fish at peril of being caught, especially by a seine fleet in the Inner Karluk Section. My concern with this proposal is that the Department may anticipate adequate escapement, but if the fish unexpectedly back out of the lagoon and get caught by the seine fleet, the Northwest District could face additional closures that would not otherwise occur. These actions reallocate the sockeye resource from setnetters to seiners.

I understand the management concern on the Karluk and I support the goal of developing adequate management tools to ensure a sustainable sockeye return. However, the Department has two new management tools which have been largely untried. The first is a regulation passed by the Board in 2005 which allowed for Kodiak area salmon fisheries to open on June 1st. This earlier opening allows for the Department to gauge run strength and intercept very large runs. This option was exercised in 2005 and 2006, but not 2007. In fact, in 2007 the Department waited until June 5th for the first opening on the Westside and continued with regular closures throughout June and the upper escapement goal was exceeded by approximately 30,000 fish. The Department estimated that a June 1st opener could catch an additional 150,000 sockeye which would have prevented this over escapement. This indicates that the Department has underutilized an existing powerful management tool. Moreover, I believe passing the current proposal will discourage future use of the June 1st opening option because the Department can rely on a terminal mop up fishery.

The second new tool that the Department has is the recently received grant for DIDSON sonar to be used on Kodiak. This could allow the Department to more accurately estimate the number of sockeye entering Karluk lagoon. This is a new grant and the Department has not yet been able to employ this technology. However, better understanding could allow for opening of the outer areas in time to intercept large runs.

Regrettably, the Department did not consult with the stakeholders in this fishery before submitting this proposal. The early sockeye run on the Karluk has been seriously depressed for the last three seasons and we are not anticipating a large run before the next Board cycle. The problem this proposal addresses is not an immediate concern. I would suggest that the Board table this proposal and give the Department time to coordinate with the stakeholders to develop strategies that have fewer unintended allocative consequences.

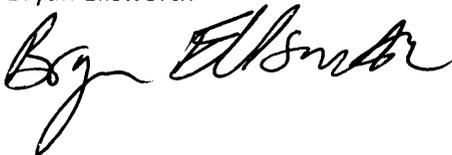
I would also like to address Proposal 71 which allows for permit stacking in the setnet fishery.

For the past two seasons I have been a dual permit holder and have financially benefitted from this provision. However, I believe that the negative impacts to the fishery and to the people of the State of Alaska outweigh my personal gains.

The State Constitution originally did not allow for limited entry fisheries because our fisheries resources are the common property of the people of Alaska. When limited entry was allowed, it was only permissible under careful consideration and could not create situations where entry to a fishery was too restrictive or exclusive. To limit or further limit entry into a fishery, the State of Alaska requires ADF&G and CFEC to follow statutory regulations, none of which has been followed for this temporary regulation to become law. When permit stacking was implemented for Bristol Bay, creating the necessary legislation to allow for this proposal, there was an optimization study done to understand the best way to solve biological and economic problems in that fishery. The program that was implemented in Bristol Bay resulted in gear reduction and alleviated problems identified by the Commissioner of Fish and Game. In the Kodiak permit stacking situation, there has been no biological, economic or management problem identified by the Department. There has been no decrease in the amount of gear fished in Kodiak, permit prices have increased and the number of permit holders could potentially be cut in half. These are circumstances which increase the barrier of entry to the fishery and make the fishery more exclusive with no justification. This proposal, in essence, results in a pooling of permits, which the State Supreme Court has struck down.

Finally, I would like to say that I am opposed to Proposal 67 which would tie the management of the Westside to minimum escapement goals in Olga Bay.

Bryan Ellsworth

A handwritten signature in black ink, appearing to read "Bryan Ellsworth", written in a cursive style.



Alaska Department of Fish and Game

Karluk River King Salmon Stock of Concern

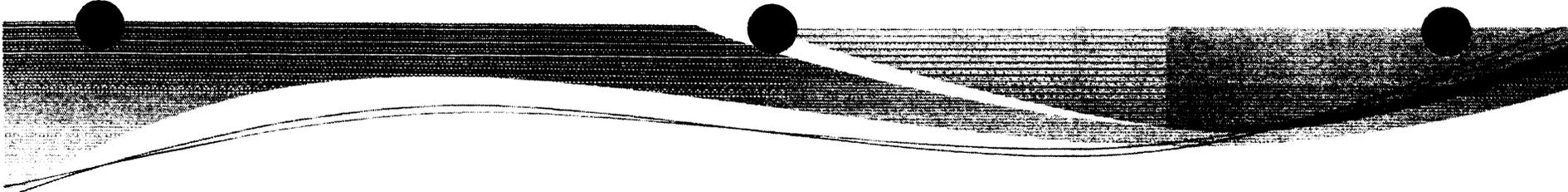
Jeff Wadle

**Regional Management Biologist
Division of Commercial Fisheries**

Matt Miller

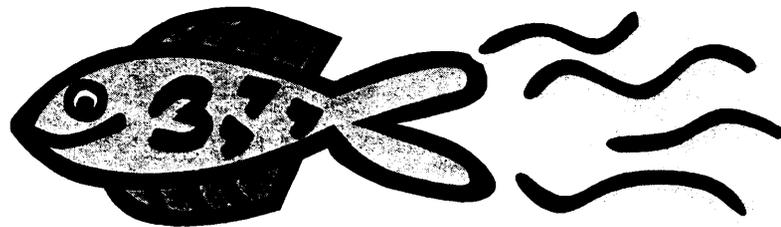
**Regional Management Biologist
Division of Sport Fish**

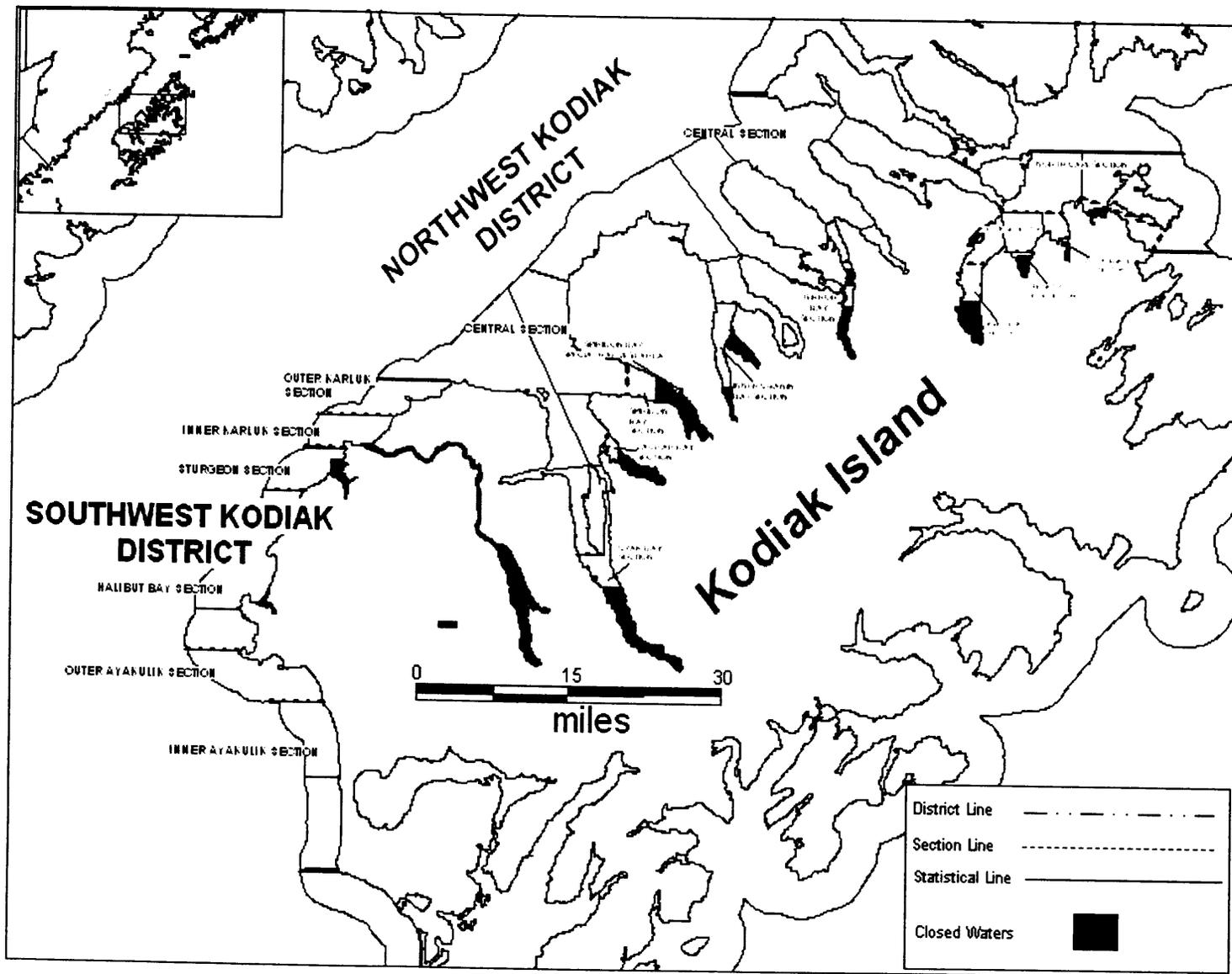
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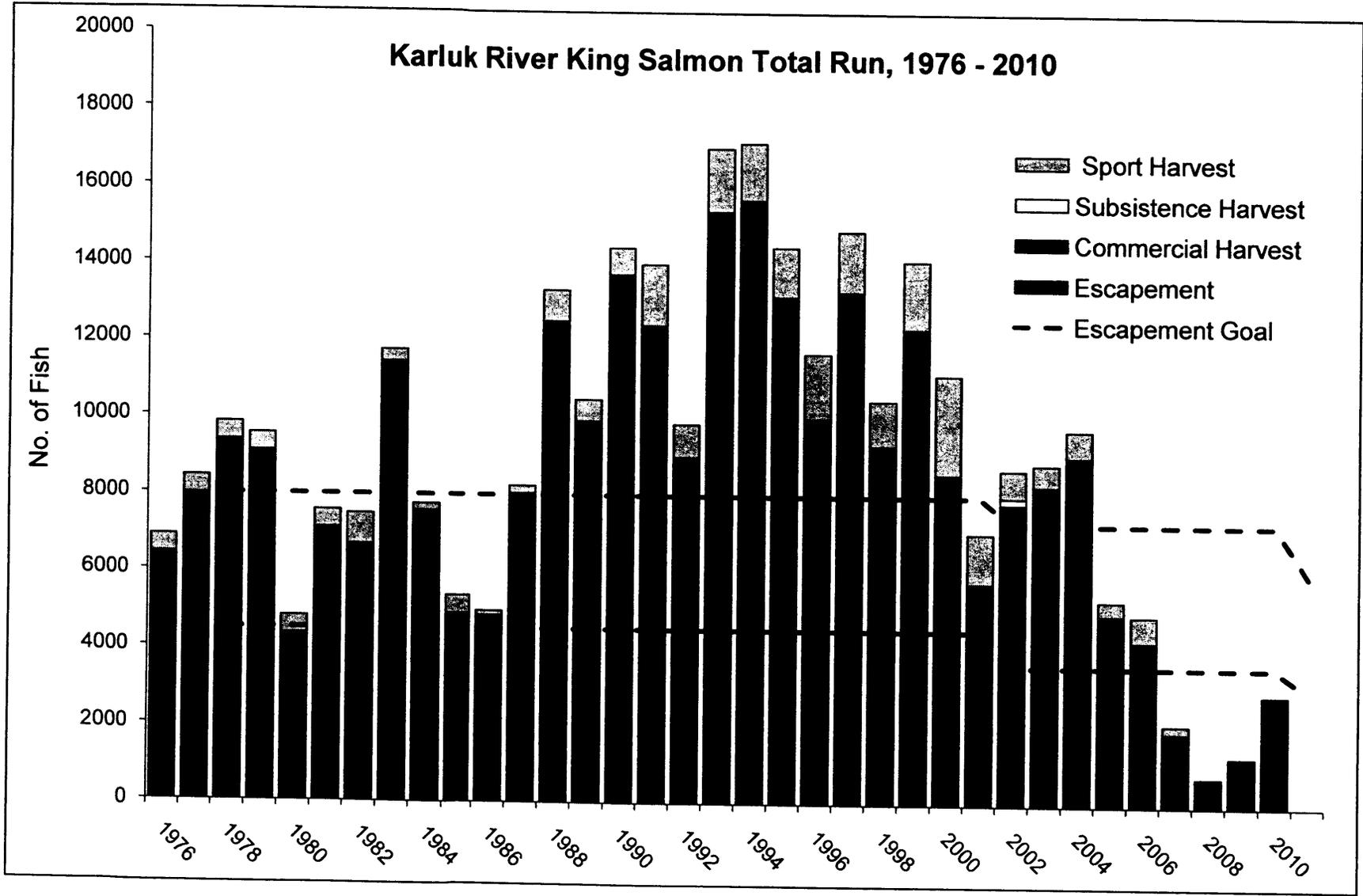


Karluk River King Salmon

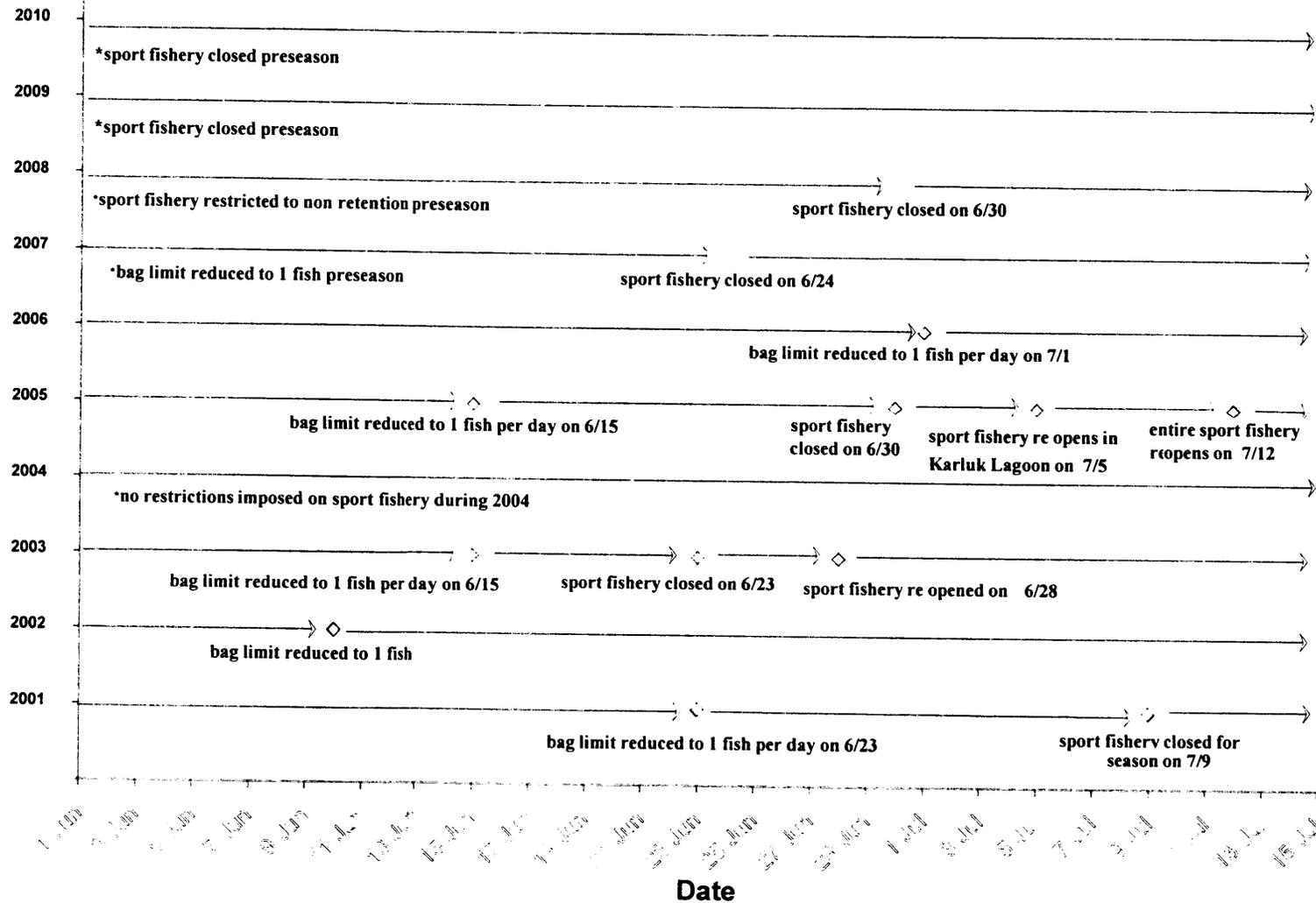
- October BOF work session
- Karluk River King Salmon Action Plan (RC 6)
- Review Plan
- Discuss Options
- Answer Questions



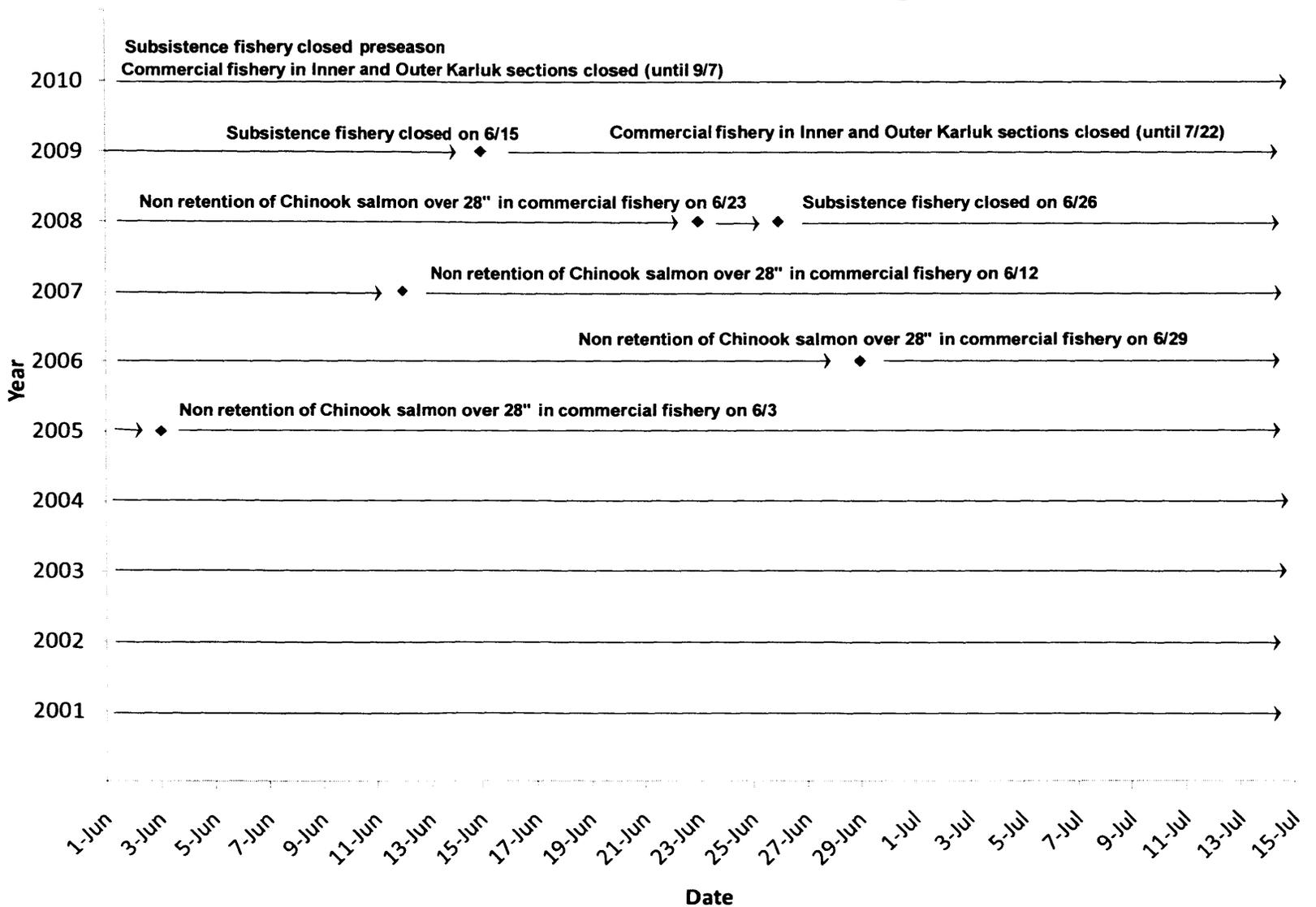




Sport Fish Management Actions



Commercial and Subsistence Management Actions



Summary of Potential Management Actions

Fishery/Action number	Summary	Specific Action
CF/#1	Status quo. Maintain current regulations, including nonretention of commercially-caught king salmon.	Continue using current nonretention regulations.
CF/#2	Expand nonretention to sections adjacent to Inner and Outer Karluk (seine gear only).	Board action needed to create regulations.
CF/#3	Expand nonretention to sections adjacent to Inner and Outer Karluk (all gear types).	Board action needed to create regulations.
Sub/#1	Status quo. Maintain current EO management for subsistence harvests.	Continue using EO authority.
SF/#1	Status quo. Use EO to manage sport fishery, with additional closures and restrictions as needed.	Continue using EO authority.
SF/#2	Restrict sport fishery by regulation (king salmon nonretention and/or closures for other species).	Board action needed to create regulations.
SF/#3	Restrict sport fishery in salt water of Uyak Bay.	Board action needed to create regulations.

Questions?



Background

My name is Len Schwarz. I retired in 2008 after working 32 years for ADFG. I am now advising Koniag on the Karluk King salmon Stock of Concern.

During my ADFG career, I spent a lot of time working on the Karluk Kings.

Starting in 1977 when I was the Karluk River weir crew leader and spent the summer counting fish up the Karluk.

From 1990 to 2008 I was the Kodiak Sport Fish Area Biologist. During these 18 years I was fortunate to spend a lot of time working on the Karluk on various king salmon projects, including:

Creel Census's: where catch, effort and demographic information were collected,

Development of the Karluk River Conservation Easement: which is an agreement between Koniag, KNWR and State of Ak. The king salmon sport fishery was a major element of the easement. Angler use was limited along with many other provisions. This agreement is still in effect

King Salmon Brood stock collection, where we spent 5 spawning seasons beach seining and penning up broodstock in the Karluk River that the department used to start a king return on the Kodiak road system. and

Yearly Escapement sampling at the weir: which allowed for the development of brood tables and escapement goal refinements.

STOCK OF CONCERN

Regarding the stock of concern issue, Koniag was supportive of the Board designating Karluk River Kings, after they did not meet escapement objectives for 5 consecutive years. We thought that this designation would allow for the **Board, Department and the public to take a comprehensive look at the issue.** A piece meal approach can develop over time and the resulting management approach is not as effective as it could be.

Our **concerns focus on the management of the Sport Fishery** and also the research portion of the Action Plan.

We have sent considerable correspondence to the Board regarding these issues (PC #1 and RC #8 & #9). My oral presentation is a summary of what he have already submitted in writing.

After years of abundant runs, Kodiak King stocks started to decrease on the Karluk in 2001 and on the Ayakulik in 2006.

Several problems have developed in management of the sport fishery once the decline in abundance started.

PROBLEMS

1) Run timing has become erratic and late. When it appears that the BEG will not be achieved, **the sport fishery is completely closed.** On four occasions the fish eventually

showed up late and the BEG is achieved. In hindsight, these closures were not necessary since the BEG was achieved. Complete closures are very **disruptive** to the sport fishery. Eighty percent of the visitors are from out of state and they cancel their planned trips once they hear that the fishery has been completely closed. Anglers do not rebook their trips when they discover that the fishery has been reopened after the fish show up unexpectedly.

2) Sport Fisheries are not allowed to operate (even as catch and release fisheries-which have minimal impact) if escapements that produce Maximum Sustained Yield are not achieved.

3) Conservation burden is being born primarily by the Karluk River sport fishery, which has been completely closed for the past 2.5 seasons, even though restrictive sport fisheries have a very small impact on the spawning escapement.

SOLUTION

The obvious solution to us is to ask **the Board to create an allocation in the form of an Optimal Escapement Goal.** Under the Sustainable Fisheries Policy, ADFG establishes BEG. The Karluk King BEG is 3,000-6,000. This goal is designed to produce Maximum Sustained Yield. The same policy says that the Board can establish OEG, which considers allocations and can be different than the BEG.

Koniag is asking the Board for an allocation that will allow a catch and release fishery (no bait, single barbless hooks), when the Karluk River king salmon escapement is projected to be 1,500 to 3,000. (reference RC# for option A management plan)

This allocation will give an important tool to the department when managing the sport fishery and will resolve all the problems mentioned above: Reduce complete closures in favor of catch and release, allow fishery to operate if OEG range is achieved and more equitably distributes conservation burden.

SUMMARY

That's about all we can say with the limited time we have, however we hope the board appoints a committee to work on the Karluk River Stock of Concern, and we would like to serve on that committee. Establishing a sport fish allocation in the form of an OEG which allows for a catch and release fishery **would greatly improve the management of the king sport fishery. The idea really has a lot of merit. It solves several problems, with very little cost to the resource.**

As a summary illustration, examine what happened to the king fisheries last year without an OEG (*RC #9 Last Page*)

Without OEG:

Ayakulik River was closed for 12 days unnecessarily and the fishery ended for all practical purposes once the closure was announced.

Karluk: did not operate, even though the weir count was only 83 fish below the new BEG

With OEG:

Ayakulik River, no closure, no disruption, 12 days of catch and release fishing then a reopening.

Karluk: would have operated all year and escapement would have been 2,800 instead of 2,900

Thanks for the opportunity to address the Board.

2010

Kodiak King Salmon Sport Fisheries

“WITHOUT” Optimal Escapement Goal (OEG)

Karluk River

CLOSED ALL SEASON

Goal = 3,600 – 7,300

2010 Escapement = **2917**

Ayakulik River

CLOSED June 26-July 7

Goal = 4,800 – 9,600

2010 Escapement = **5,310**

“WITH” Optimal Escapement Goal (OEG)

OPEN ALL SEASON

Goal = 3,600 – 7,300

2010 Escapement = **2817***

OPEN ALL SEASON_(c/r 12 days)

Goal = 4,800 – 9,600

2010 Escapement = **5,210****

*81 fish is estimated hooking mortality related to fishing all season long under catch and release restrictions (no bait, can not remove fish from water). Figures used to estimate hooking mortality: catch of 1,153 (same catch as 2006, when there were 30% more fish in the river and bait was allowed) with a 7% hooking mortality. $1,153 \times 7\% = 81$ fish

** no more than 100 fish hooking mortality during catch/release fishery June 26-July 7

The Karluk Chinook have not met their biological escapement goal for five consecutive years, this collapse is unprecedented and resulted in its designation of a stock of concern by the Board of Fish earlier this fall. A run that once topped 13,000 hit a low point of 750 fish in 2008. I am here to speak towards the importance of the Karluk Chinook and the management structure that is unique to the Karluk River.

My name is Charlie Powers Vice President Corporate Affairs for Koniag. Not only are we the Regional Native Corporation for the Island, but we also are the majority land owner in the Karluk River drainage. Representing a people that have occupied the Karluk for over 10,000 years, the health of this system is vitally important. As land owner, fisheries regulation and management have a significant impact on economic opportunity and community sustainability.

The Karluk River is a resource of historic proportion. It is touted as one of the most productive systems in the world. As the land owner, Koniag is thrust into managing access of users targeting King Salmon. This demand has ranged from intense use in the 1990's to no use in the later part of this decade. In response to the intense pressure during the robust returns, Koniag entered into a three party conservation easement agreement with the US Fish & Wildlife and the State of Alaska. The agreement was conceived through focused feedback loops involving stakeholders and meaningful input.

While the agreement is lengthy due to legalese, its purpose is relatively simple.

1. Establish development and use limits to preserve the resources.
 - a. A cap of 42 commercial and 28 public permits during the king salmon season is stipulated.
 - b. A limit of five cabins along the 15 miles of the river and significant restrictions on camping is specified.
2. Ensure and establish public access, both commercial and private.
 - a. Now, over 56,000 acres of private land is available for public use.
 - b. Permitting provides a channel to communicate responsible use and collect data on consumption.
3. Provide economic opportunity for villages of Karluk and Larsen Bay.
 - a. Arguably as party to the agreement, the state has a responsibility to assist in facilitating economic opportunity for these communities.

Koniag, the Kodiak National Wildlife Refuge and the Alaska Department of Fish and Game meet regularly to evaluate the implementation of the agreement and the condition of the resource. We enjoy a cooperative relationship that makes this river unique and carefully managed.

Koniag's unwavering position on this issue is twofold. First, that the conservation burden be shared by allowing in river catch and release sport fish opportunity based on an optimal escapement goal. As proposed this restricted effort will have an insignificant impact on the stock but will have a tremendous positive impact on the in river sport fish economy. Second, make sure that the Stock of Concern Action Plan proposed by the department and as required by regulations include avenues to restore this stock to its optimal range. The action plan should include research, rehabilitation, and management solutions.

Both of these positions have been vetted at the Advisory Committee to the Board of Fish with over ten hours of work group and advisory committee discussions. Both of these positions come before you with unanimous consent by the Advisory vote. Both of these positions have been examined and recommended by the Karluk River Advisory Committee which consists of Commercial, Subsistence, and Tribal representatives from the communities of Karluk and Larsen Bay. You will have heard testimony from a retired expert biologist intimately familiar with the Karluk on the in river fishery; a Koniag shareholder lodge operator that has described the remarkable effect the stock has to community sustainability; and an operator on the Ayakulik River that describes how current regulation unnecessarily effects opportunity in practice.

My purpose is to make certain the Board of Fish appoint a committee during this board cycle to evaluate the merits of the Advisory Committee proposal regarding the Karluk Chinook Stock of Concern. I would also like to be appointed to serve on that committee and suggest that the following people also be appointed:

Mike Carlson

Len Schwartz

Fred Katelnikoff

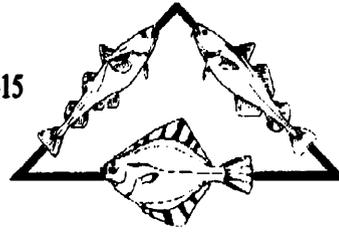
Kip Tomlet

Groundfish Data Bank

Alaska

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director jbonney@gci.net
Katy McGauley, Fisheries Biologist agdb@gci.net



RC 18

January 11, 2011

Mr. Webster
Chairman of the Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Board of Fish finfish proposals 52 and 53 (Close Sitkalidak Strait and Marmot Bay to pelagic pollock fishing)

Dear Mr. Webster and members of the Board,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the shorebased processors located in Kodiak and the trawl catcher vessels based in Kodiak. The Kodiak trawlers are mostly family owned businesses who have participated in the federal groundfish fisheries since Americanization of the fisheries.

These two inside three pollock fishing closure proposals have the potential to impact the community of Kodiak, Kodiak Island processors, the processing workforce, the vessel owners, vessel crews, fishing service and support sectors. We support the ADF&G Kodiak Advisory Committee position; the committee was opposed to both of these proposals. Because our fisheries are complex with multijurisdictional management between federal and state waters we felt it was best to first educate you about the overall Gulf of Alaska (GOA) pollock fishery and management structure before articulating our arguments against proposal 52 and 53.

GOA POLLOCK FISHWRY -- BACKGROUND INFORMATION

Description of the GOA pollock fisheries: The GOA pollock fisheries are federally managed. The GOA is divided into four reporting areas as shown in Figure 1. Quotas are allocated to each reporting area by season. The bulk of the harvest occurs in Area 610, 620 and 630 with over 97% of the available quota allocated to these three reporting areas.

There are four distinct seasons in Area 610 (Shumagins), Area 620 (Shelikof) and Area 630 (Kodiak). (Area 610 is also known as the Western Gulf of Alaska regulatory area and Area 620 and Area 630 combined encompass the Central Gulf of Alaska regulatory area.) The seasonal structure is shown in table 1.

Pollock is harvested exclusively with trawl gear with entry limited by the federal license limitation program. There is no catch share program in the GOA as in the Bering Sea but instead participating vessels race for the available harvest by season and area. Because of the race for the available quota, openers are short - typically closing in a few days to as much as 2 weeks after the fishery opens. The GOA pollock fishery has been MSC certified since 2005 as a well-managed, sustainable fishery. After a 5-year review, it was recently re-certified in September 2010.

Pollock harvests in the GOA are exclusively taken by catcher vessels that deliver to shoreside processors. The pollock fishery is the most important fishery with regards to economic revenue to the trawl sector that operates in the GOA. It is also important economically to the processing sector and Alaska coastal communities where these processors and vessels operate.

Figure 1. Regulatory and Reporting Areas in the Gulf of Alaska

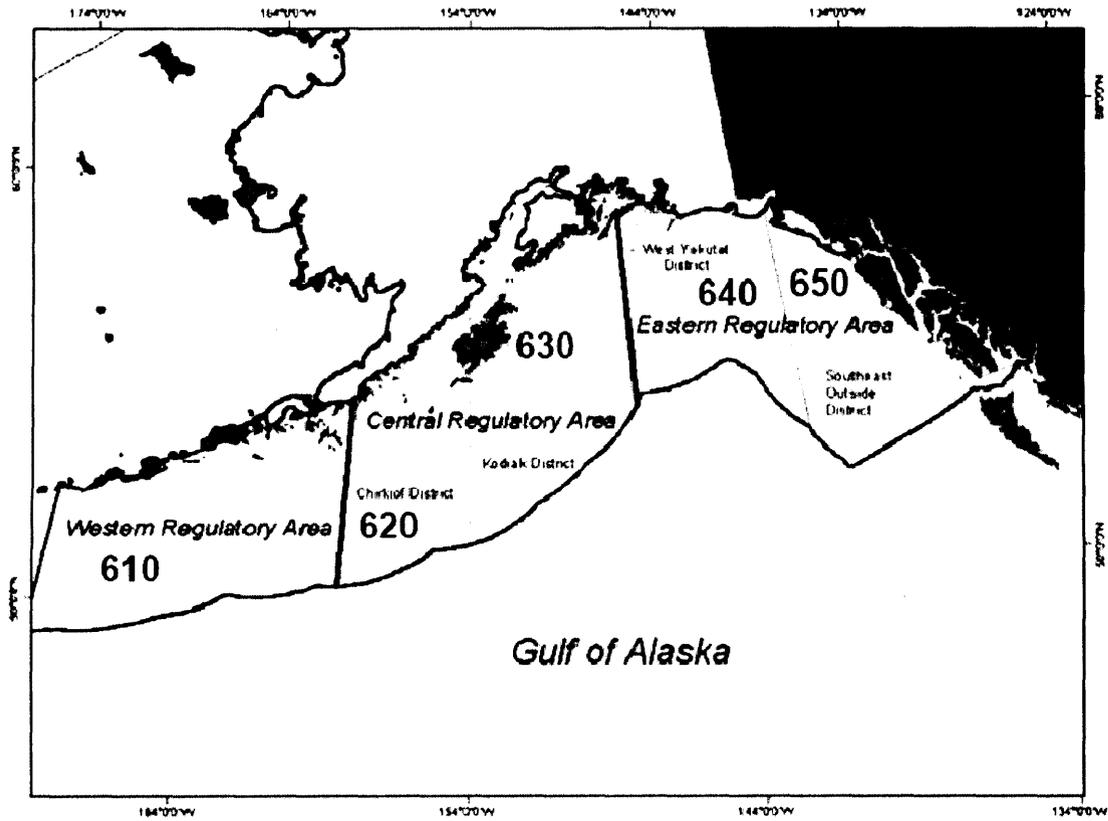


Table 1. GOA pollock seasonal fishing structure

GOA Pollock Seasons		
SEASON	Regulatory Open	Regulatory Closure
A Season	Jan 20	Mar 10
B Season	Mar 10	May 31
C Season	Aug 25	Oct 1
D Season	Oct 1	Nov 1

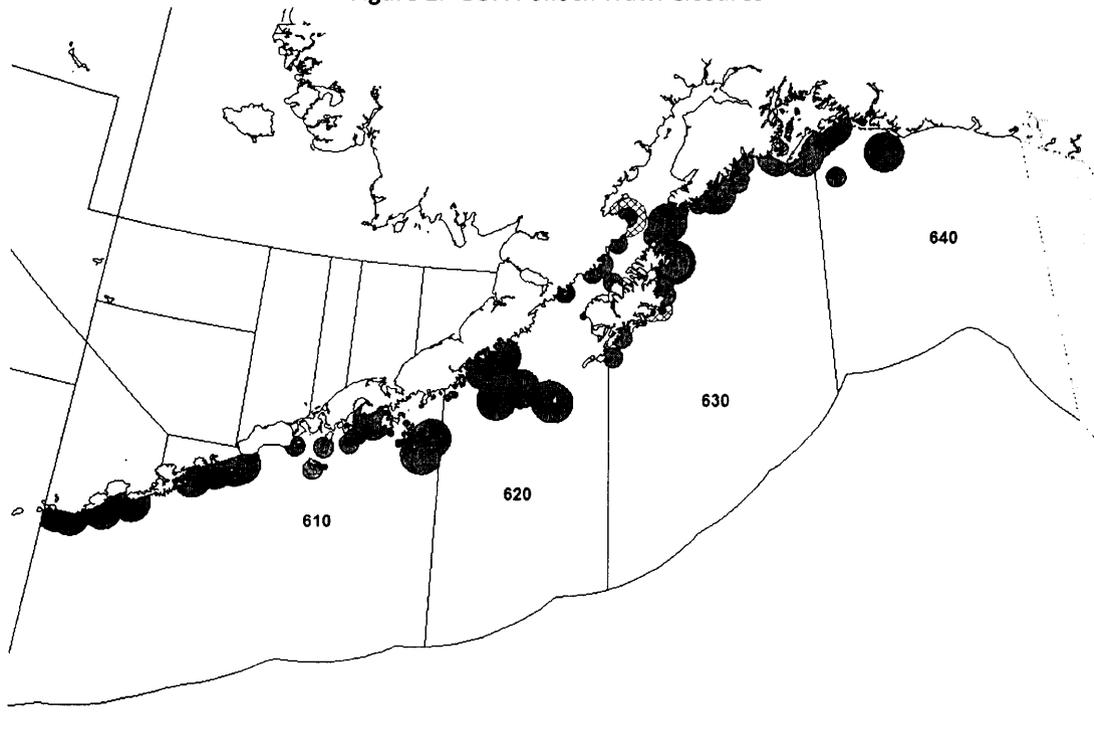
Closure areas for Pollock fishery: Pollock trawl fishing closures for SSL conservation established 10 to 20-nm fishing closures surrounding rookeries and haul-outs to protect endangered Steller sea lions. These closures have been in place since 2001 and close a significant portion of the fishing grounds (See table 2 and Figure 2)

Table 2. "Fishable" Areas closed due to SSL measures

Reporting Area	Area Sq km (0-500 m)	Sq Km closed	% of Area Closed
610	59,421	27,071	45.56%
620	64,609	21,292	32.96%
630	101,617	23,121	22.75%
Totals	225,647	71,484	31.68%

**Fishable area defined as less than 500 meters*

Figure 2. GOA Pollock Trawl Closures



Observer coverage: In the Federal fisheries, all vessels that are 60 feet or longer are required to carry a ride along observer 30% of their fishing days per calendar quarter as well as have one trip per target fishery observed. Vessels pay for their own observer coverage at a cost ranging from \$500 to \$1,000 per day. The Observer Program sampling protocols for prohibited species (salmon, crab, halibut) caught incidentally in the pollock target are based on vessel observer census data from the plant and vessel. To get a good count of all the salmon in the catch, the entire catch is monitored as it is delivered to shoreside processing plants. This ensures that all salmon in the observed delivery are sorted out, identified and counted. This sampling method is much more robust than observer basket samples for assessing rare species such as Chinook salmon and produces data representative of individual vessel fishery performance. The observed data is extrapolated to the unobserved portion of the fleet to account for total fishery performance.

The North Pacific Fisheries Management Council recently took action to restructure the observer program (implementation year likely 2013). Under the restructured program NMFS will decide if and when a vessel will carry an observer with the option to increase or decrease coverage in selected fisheries as needed. All vessels and processors will pay a tax based on ex-vessel value to fund these observer days. Coverage will be expanded to include all vessels down to 40 ft in length and the halibut IFQ sector. Previously, both the halibut and less than 60 ft sectors were unobserved.

GOA Chinook salmon: The Gulf is known to be a major feeding ground for Chinook salmon from Asia, West Coast, Canada, and Alaska. Hatchery released Chinook salmon are estimated to be approximately 250 million per year (Figure 3) Anecdotal evidence suggests many of the bycaught Chinook are hatchery fish from Canada, NW and SE Alaska, usually averaging less than 6 lbs each. Genetic Stock Identification research is well underway in the BSAI, but observers have only recently (2010) started to collect tissue samples for DNA/stock of origin testing on GOA Chinook bycatch.

Figure 3. Table 12 from the NPFMC December 2010 GOA Chinook Bycatch analysis showing Chinook hatchery releases by country, 1999-2006

Table 12 Hatchery releases of juvenile Chinook salmon, by country, compared to GOA groundfish bycatch, in millions of fish

Year	Russia	Canada	USA	Total	Total GOA groundfish Chinook bycatch
1999	0.6	54.4	208.1	263.1	.031
2000	0.5	53.0	209.5	263.0	.027
2001	0.5	45.5	212.1	258.1	.015
2002	0.3	52.8	222.1	275.2	.013
2003	0.7	50.2	210.6	261.5	.015
2004	1.17	49.8	173.6	224.6	.021
2005	0.84	43.5	184.0	228.3	.031
2006	0.78	41.3	181.2	223.3	.019

Source: North Pacific Anadromous Fisheries Commission reports: Russia (Anon. 2007; TINRO-centre 2006, 2005); Canada (Cook and Irvine 2007); USA (Josephson 2007; Eggers 2006, 2005a; Bartlett 2005, 2006, 2007).

Chinook salmon Bycatch data in the GOA pollock fishery: NMFS estimates Chinook salmon bycatch based on data from the North Pacific Groundfish Observer Program. The observer data is used to create bycatch rates and landing data are multiplied against the rates to provide bycatch estimates. Chinook salmon bycatch with pelagic trawl gear occurs predominantly in the pollock target fishery and accounts for most of the Western and Central Chinook bycatch, an average of 75% over the years 2003-2010, an annual average of 18,365 fish.

In 2010, there was a high incidence of Chinook salmon bycatch in the GOA pollock fisheries. The high number has been discussed extensively in the press across the State of Alaska. However, it is important to note that the bulk of the bycatch occurred in Area 610 (Western GOA) not Area 630 (Central GOA) which is the reporting area that includes the two closure proposals (see table 3 below).

Table 3. 2010 Chinook bycatch in numbers of fish and rates (# salmon / MT of catch) in the pollock target by area. From NMFS Catch Reports through December 25, 2010.

Area	Sum GF (MT)	Chinook (no.)
610 (WGOA)	28,593	31,579
620 (CGOA)	28,449	6,379
630 (CGOA)	16,947	5,956
Grand Total	73,989	43,914

North Pacific Fisheries Management Council (NPFMC) is addressing Chinook Salmon Bycatch: At the NPFMC December meeting the Council prioritized GOA Chinook salmon and are working to develop a comprehensive approach to address GOA salmon bycatch. The Council plans to fast track measures for the GOA pollock fisheries (See Attachment 1).

OPPOSITION TO PROPOSAL 52 (SITKALIDAK STRAIT) AND PROPOSAL 53 (MARMOT BAY)

Closures either seasonally or permanently are old school management methods to reduce bycatch: Permanent or seasonal closures are an old school approach for bycatch management. Hard lines don't allow for protection when the species to be protected move across those lines or allow for fishing opportunity within the closure areas when the species you are trying to protect is no longer there. Figure 6 and Figure 7 (NMFS In-Season Report to the Council, 2010) show Chinook salmon bycatch in number of fish for the years 2006 -2010 by 10 km squared blocks. These figures show that there is extreme variability of Chinook salmon bycatch by location for any one year. In many cases both Marmot Bay and Sitkalidak Straits are areas with low Chinook salmon bycatch. The Fleet cannot afford to give up any more grounds for closure areas. In reporting Area 630, 22.75% of fishable grounds are already closed to protect Steller Sea Lions (Figure 4, Figure 5). Forcing vessels to move to other grounds with lower CPUE may very well increase bycatch of Chinook salmon. It is obvious that the proposers of proposal 52 and 53 do not understand the trawl pollock fishery; large amounts of state waters are already closed to pelagic trawling due to SSL measures and moving the fleet to lower pollock CPUE areas may very well increase Chinook salmon bycatch not reduce Chinook salmon bycatch as they suggest.

Figure 4. SSL closures for directed pollock fishing, Jan 1 - May 31.

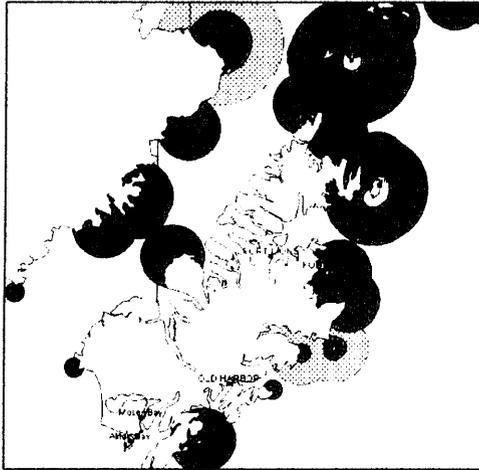


Figure 5. SSL closures to directed pollock fishing June 1 - Nov 1

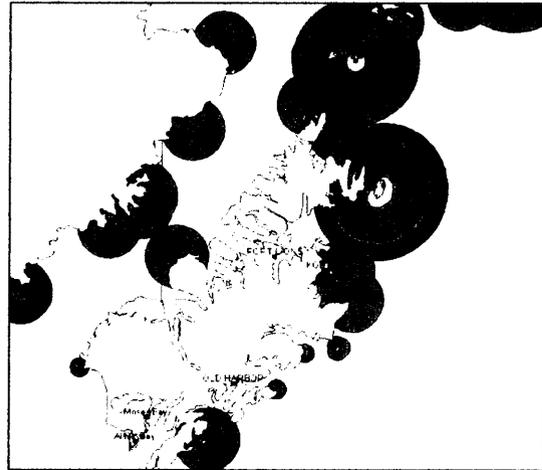


Figure 6. Observed Chinook salmon catch 2006-2009

2006 - 2009 Observed Chinook Salmon PSC

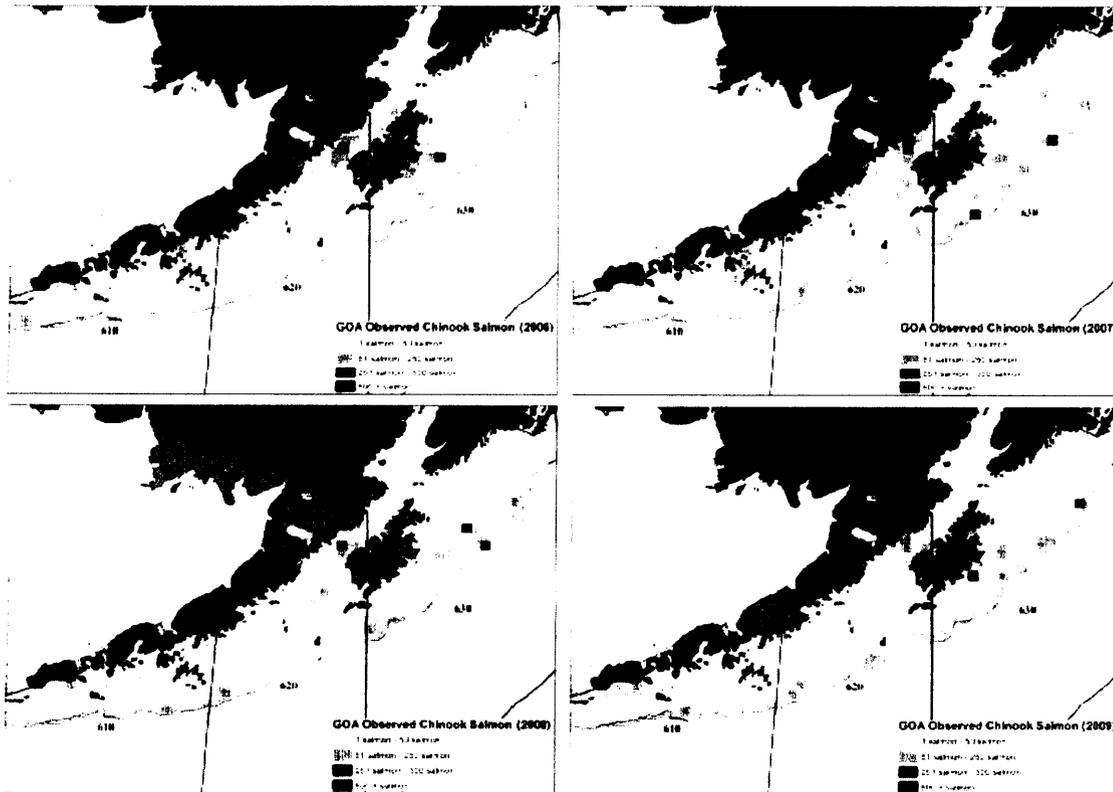
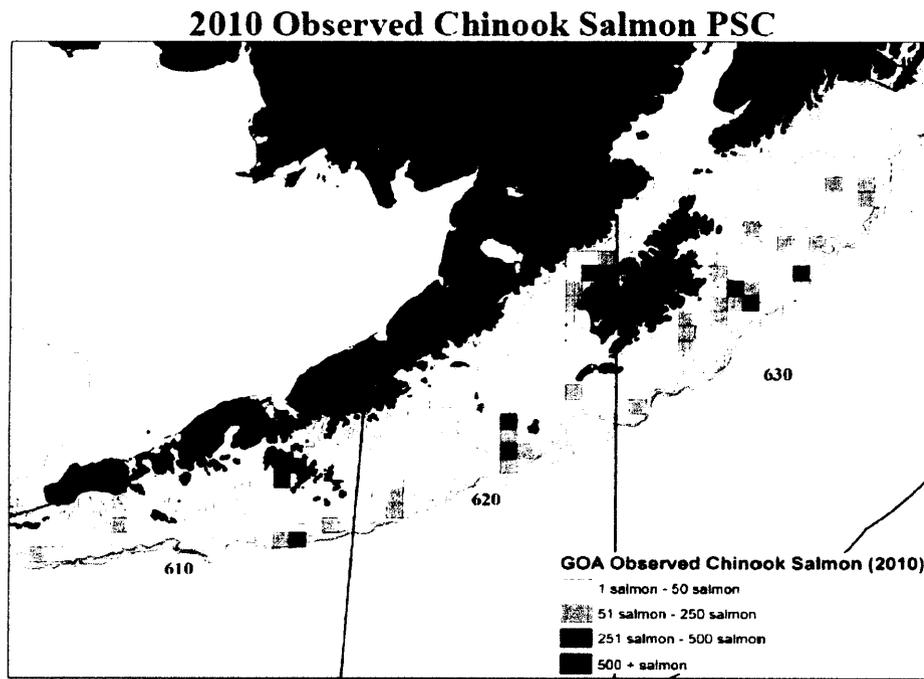


Figure 7. 2010 Observed Chinook Bycatch



Pollock Fishing timing and length: The pollock fishery in the Gulf is an intense race for fish with very short openers (see Table 4 and Table 5). There is no pollock fishery during the high salmon season (summer months) when Chinook are returning to the Alaska river systems. Pollock harvests in the C/D seasons (fall) usually occur mid-September (after the cod fishery) to early or mid October depending on weather and CPUE. The fleet is in and out of these areas based on the seasonal pollock structure and available quotas which manage the fishery. Typically, fishing occurs for only one or two weeks on an annual basis.

Table 4. Days open to directed pollock fishing, Area 630 A/B Season.

Year	Season	Fished	Days fished
2010	A/B season	2/28-3/2, 3/22 – 3/25	5
2009	A/B season	2/11, 3/9-3/11	3
2008	A/B season	2/23-2/25	2

Table 5. Days open to directed pollock fishing, Area 630 C/D Season.

Year	Season	Fished	Days fished
2010	C/D Season	9/18-9/19; 10/1-10/2	2.5
2009	C/D Season	9/29-10/1	2
2008	C/D Season	9/16-9/19; 10/4-10/10	11

Fleet Safety: Sitkalidak Strait and Marmot Bay are weather-protected areas for when rough weather in a short race for fish precludes many of the vessels, especially the smaller boats, from fishing in a safe area. Safety is number one priority for the fleet. Pushing the fleet farther offshore puts vessel safety at risk.

Fishery Data shows very little catch besides pollock: Data provided by ADF&G staff show that the pollock fishery takes very little catch of incidental species that these proposers are concerned about. In the Sitkalidak Strait area, 98% of the catch consists of pollock, miscellaneous flatfish or Jellyfish while in the Marmot area, 99.5% of the catch consists of pollock and miscellaneous flatfish. Within Sitkalidak Straits, other commercial fishing gears (Longline, pot and jig) catch more Halibut and Cod than the trawl fleet. Additionally, while salmon catch data from the commercial salmon participants is not provided, it would be expected that these commercial users catch significant amounts of Alaska bound salmon within these areas that could impact Old Harbor subsistence users within the Sitkalidak Strait proposed closure area. In all cases, other commercial fisheries harvest more of the species of concern than the trawl fleet.

Fishing Effort: In the Sitkalidak Strait area, on average, five vessels have fished in the proposed closure area annually. Most pollock harvests occur in the September and October time period. Due to the intense nature of the pollock fishery, vessels are fishing in the area for only a few days per year. Area 630 pollock harvest has ranged from 0 to 6.3% of the annual harvests.

In the Marmot area, typically 25 vessels fish in the area. Data provided by ADF&G staff show that as much as 53% of the total annual Area 630 quota has been taken within this area. During the SSL closure development process this area was given the highest priority by the fleet to keep open to pollock fishing throughout the negotiation process with NMFS. As the data shows, this area yields high CPUE for pollock with minimal amounts of Chinook salmon bycatch in most years. In both cases these areas are important to individual vessel operations. Approval of either one of these proposals will result in direct costs for individual participants within the pollock fishery.

Observer data: Observer data are sufficient to document catches within Sitkalidak Strait (ranging from 11 to 43%) and Marmot Bay (ranging from 21 to 41%). The short nature of the fisheries makes it impossible for a vessel to change behavior because an observer is board. With the current minimum of one trip per target fishery per quarter requirement, many of the vessels take an observer, if available, because of the very short fishery duration. The fleet prefers to take observers in these areas because they are sheltered from weather and thus a safer working environment for the observer. Additionally, observer costs for the vessel are lower because transit time to and from the fishing grounds is less than to and from other fishing areas; the net result is vessels receive more fishing day credits to meet observer coverage requirement for these areas that are closer to town.

In conclusion, these proposals are more about not having trawling in the proposers' backyard than any type of fish allocation or conservation concern. The reality is that proposal 52 and 53 may very well increase bycatch and/or incidental catch of other fish species, not yielding the result the proposers are advocating for.

In terms of Chinook salmon bycatch, the Kodiak trawl sector will be fully engaged in the NPFMC process which will be developing a comprehensive salmon bycatch management plan. This includes determining stock of origin of by-caught Chinook salmon and developing Chinook salmon bycatch controls. Our industry will definitely be looking to the Bering Sea pollock industry for lessons learned with regards to salmon bycatch, both their voluntary rolling hotspot fishing closure program based on actual daily fishing conditions and the use of salmon excluders to control salmon bycatch. We would be happy to report back to the BOF on our progress addressing this important issue.

**C-5 GOA Chinook salmon bycatch
FINAL Council motion**

The Council adopts the following problem statement and moves the following alternatives for initial review.

Problem statement:

Chinook salmon bycatch taken incidentally in GOA groundfish fisheries is a concern, and no salmon bycatch control measures have been implemented to date. Current observer coverage levels and protocols in some GOA groundfish trawl fisheries raise concerns about bycatch estimates and may limit sampling opportunities. Limited information is available on the origin of Chinook salmon taken as bycatch in the GOA; it is thought that the harvests include stocks from Asia, Alaska, British Columbia, and lower-48 origin. Despite management actions by the State of Alaska to reduce Chinook salmon mortality in sport, commercial, and subsistence fisheries, minimum Chinook salmon escapement goals in some river systems have not been achieved in recent years. In addition, the level of GOA Chinook salmon bycatch in 2010 has exceeded the incidental take amount in the Biological Opinion for ESA-listed Chinook salmon stocks. The sharp increase in 2010 Chinook bycatch levels in the GOA fisheries require implementing short-term and long-term management measures to reduce salmon bycatch to the extent practicable under National Standard 9 of the Magnuson-Stevens Act. In the short term, measures focused on the GOA pollock fisheries are expected to provide the greatest savings. In the long term, comprehensive salmon bycatch management in the GOA is needed.

Alternatives for expedited review and rule making:

The below alternatives apply to directed pollock trawl fisheries in the Central and Western GOA.

Alternative 1: Status quo.

Alternative 2: Chinook salmon PSC limit and increased monitoring.

Component 1: 15,000, 22,500, or 30,000 Chinook salmon PSC limit (hard cap).

Option: Apportion limit between Central and Western GOA

- a) proportional to the pollock TAC.
- b) proportional to historic average bycatch rate of Chinook salmon (5 or 10-year average).
- c) proportional to historic average bycatch number of Chinook salmon (5 or 10-year average).

Component 2: Expanded observer coverage.

Extend existing 30% observer coverage requirements for vessels 60'-125' to trawl vessels less than 60' directed fishing for pollock in the Central or Western GOA.

Alternative 3: Mandatory salmon bycatch control cooperative membership.

In order to fish in the Central or Western GOA pollock fisheries a vessel must be a member of a salmon bycatch control cooperative for the area where they are participating. Cooperative formation will be annual with a minimum threshold (number of licenses).

Cooperative contractual agreements would include a requirement for vessels to retain all salmon bycatch until vessel or plant observers have an opportunity to determine the number of salmon and collect any scientific data or biological samples. Cooperative contractual agreements would also include measures to control Chinook salmon bycatch, ensure compliance with the contractual full retention requirement, promote gear innovation, salmon hotspot reporting, and monitoring individual vessel bycatch performance.

Annual cooperative reports to the Council would include the contractual agreements and successes and failures for salmon bycatch controls by season and calendar year.

The Council requests staff explore options related to the following aspects of mandatory cooperative formation:

- Minimum number of licenses required to promote meaningful exchange of information and cooperation to avoid bycatch under the current directed fishery management structure. (Minimum threshold for cooperative formation should be set to ensure all eligible licenses have a reasonable opportunity to participate).
- Evaluate the costs and benefits of minimum thresholds of cooperative membership that would allow for no more than 1 or 2 cooperatives in each region.
- Options to ensure participants outside of a bycatch control cooperative would be subject to regulatory bycatch controls if it is determined mandatory cooperative membership is not possible.
- Appropriate contract elements and reporting requirements.

Alternatives for regular review and rule making track:

The below alternatives apply to non-pollock trawl fisheries in the Central and Western GOA.

Alternative 1: Status quo.

Alternative 2: 5,000, 7,500, or 10,000 Chinook salmon PSC limit (hard cap).

Option 1: Apportion limit between Central and Western GOA.

Option 2: Apportion limit by directed fishery.

Applies to both options: Apportion proportional to historic average bycatch of Chinook salmon (5 or 10-year average).

Alternative 3: Mandatory salmon bycatch control cooperative membership.

In order to fish in the Central or Western GOA trawl fisheries a vessel must be a member of a salmon bycatch control cooperative for the area where they are participating. Cooperative formation will be annual with a minimum threshold (number of licenses).

Cooperative contractual agreements would include measures to control Chinook salmon bycatch, promote gear innovation, salmon hotspot reporting, and monitoring individual vessel bycatch performance. Annual cooperative reports to the Council would include the contractual agreements and successes and failures for salmon bycatch controls by season and calendar year.

The below alternatives applies to all trawl fisheries in the Central and Western GOA.

Alternative 4: Full retention of salmon.

Vessels will retain all salmon bycatch until the number of salmon has been determined by the vessel or plant observer and the observer's collection of any scientific data or biological samples from the salmon has been completed.

Option: Deploy electronic monitoring or observers to monitor for discards in order to validate salmon census data for use in catch accounting.

The Council also requests staff to provide the following:

- Chinook salmon bycatch rate data for each GOA groundfish fishery by month and area.
- Correlation between bycatch rates and time of day (based on observer data or anecdotal information).
- Correlation between bycatch rates and time of year (based on observer data or anecdotal information).
- Information on the flexibility under Steller sea lion measures to adjust season dates.
- Current trip limit management and implications of lowering GOA pollock trip limits.
- Information on current excluder use, effectiveness of salmon excluders, and deployment of excluders on smaller trawl vessels.
- A discussion of potential benefits, with respect to available bycatch measures and salmon savings, of a cooperative management structure for the GOA pollock fisheries. The discussion should assume a cooperative program for the Central and Western GOA directed pollock catcher vessels. Licenses qualifying for the program would annually form cooperatives that would receive allocations based on the catch histories of members. Catcher vessel cooperatives would be required to associate with a shore-based processor in the GOA, but members may change cooperatives and cooperatives may change processor associations annually without penalty.
- Analysis of management alternatives should include potential impacts of those actions on subsistence users.

Kodiak Fish & Game Advisory Committee Meeting Minutes

Sunday, January 9, 2010

Call to Order 2:15 p.m.

Roll Call: Oliver Holm, Don Fox, Kip Thomet, Julie Kavanaugh, Duncan Fields (Old Harbor), Charlie Powers (subsistence) Alexus Kwachka, Chris Fiala, Pete Hanna.

A quorum was established

New Business: Karluk River Chinook Salmon Stock of Concern

Motion: Move to accept the subcommittee recommendations regarding incorporating in the "Stock of Concern Action Plan" the following: Fishery management actions (item C) would incorporate the Koniag Proposal for an OEG to be established at 1,500 Chinook with an option that the management measures under the plan (no bait, barbless hook, no retention) would remain in place until 4,500 Chinook are expected to escape in the system. See attachment

The research plan (item 5) would incorporate the following elements:

1. First priority is to keep the current research/management program with the weir and weir sampling and fry studies in place. Could improve this to try to do more unguided angler interviews at the portage. Also important to have the weir in early in May, by the 20th or so. Stress this for the Department.
2. Need stock identification work for Karluk Chinook. Need to sample the saltwater sport fishery, the commercial salmon fishery (and not just the west side fishery) and the trawl bycatch. To track total stock mortality need better identification information. This is both difficult and expensive. (\$22.00 per sample for Buskin project) However, it is necessary if we really want to understand and address Karluk Chinook as a Stock of Concern.
3. Explore rehabilitation possibilities: Lots of hurdles to get over to drop eggs back in Karluk..... both money and other considerations. While we can't provide all the detail to a rehabilitation plan, it should be considered and developed. Recommend interest is some type of restocking program.

Note: KRAA is looking at sockeye production at Karluk. This may help Chinook with enhanced sockeye production.... Doesn't seem to have done any harm last time but can't correlate clear relationship between fertilization and Chinook enhancement.

4. Systemic studies to try to determine the root cause for the decline of Karluk Chinook.

Motion passed unanimously

KONIAG PROPOSAL FOR MANAGMENT OF THE KARLUK RIVER
SPORT FISHERY
REGULATORY AND ACTION PLAN WORDING

5 AAC 64.0XX. Karluk River King Salmon Sport Fishery Management Plan

(a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of stabilizing sport fishing opportunity for Karluk River king salmon while sustaining long term health of the king salmon stock.

(b) In the Karluk River king salmon sport fishery,

(1) the Biological Escapement Goal (BEG) is 3,000-6,000 king salmon;

(2) an Optimal Escapement Goal (OEG) to allow catch and release-only fishing is 1,500-3,000 king salmon;

(3) the inriver sport harvest will be estimated annually by the department's statewide harvest survey; however, harvest estimates used for inseason management of the sport fishery may also be based on the best catch and effort information currently available to the department;

(4) the bag, possession and annual limits, and harvest recording requirements for king salmon are those specified for fresh waters in 5 AAC 64.022 and 5 AAC 64.025.

(c) The sport fishery will be managed as follows:

(1) if the department projects the BEG will be achieved, a harvest will be allowed under the provisions of 5 AAC 64.022 through 5 AAC 64.030;

(2) if the department projects the BEG will not be achieved but that the OEG will be achieved, the commissioner shall allow, by emergency order, a catch and release-only fishery for king salmon with the following provisions:

(A) only artificial lures may be used, with not more than one single, barbless hook with gap between point and shank one-half inch or less, attached directly to the lure;

(B) all king salmon caught must be released immediately without being removed from the water;

(3) if the department projects neither the OEG or BEG will be achieved, the commissioner shall close, by emergency order, the sport fishery for king salmon.

5 AAC 64.0XX. BEG 1500-4500

Chinook Stocks of Concern
Subcommittee of Kodiak Fish and Game Advisory Committee
December 29, 2010

Subsistence Discussion:

Gary Wheeler, Kodiak Wildlife Refuge Manager gave an overview of Federal regional subsistence standards.

Department clarified that when a subsistence fishery is closed, it does not necessarily mean that ALL other fisheries have to close..... i.e. the Buskin river.

Question: Since Federal Regulations allow legal subsistence fishing with a rod and reel, how do you tell this apart from "sport" fishing? It may be hard to differentiate the two, especially if the angler is a resident. However, a State permit is needed if subsistence fishing

Question: Is there any subsistence above the weir on Karluk? No. Also, not much subsistence fishing on the Ayakulik. When report from Karluk....

Comment: It is good to close Karluk to subsistence for kings. With their beach seine fishery they have the potential to take an unlimited and mostly unknown number of kings.

Note: Reported harvest of Chinook doesn't distinguish between "in river" and "in lagoon" Overall subsistence numbers are very small. Over all there is about a 50 avg. and some years 0..... Highest is 230 on a big year.

Subsistence is open in salt water..... But no catch. Most or all are seined in lagoon.

The decision to close Karluk to subsistence is strictly based on escapement.

Recommendation #1:

King salmon subsistence fishing on the Karluk river will remain closed if the Biological Escapement Goal (BEG) is not expected to be met. (status quo) The committee further recommends that the Board set a Chinook subsistence priority for when the Department expects the Karluk Chinook stocks to meet minimum BEG escapement goals.

Question: Are the subsistence folks being screwed? Probably not, but need to carefully define what subsistence is and what the subsistence priority means.

Suggestion: We're talking about how to catch more king salmon..... we need to figure out how to put more king salmon in the river. Let's put ½ million smolt in the river each year we need to do something pro-active..... Just tell us how many more Chinook we need to turn loose to get the 5,000 back to reach the escapement goals. Can this be part of the action plan... for the Karluk Chinook stock of concern listing?

Oliver — Guide loopholes need to be closed.... Hope to close that at this meeting with Board.

Davey Jones – Ayakulik fishermen put forward a similar concept at the last board cycle.... Didn't happen..... the Board and the Department felt that they could use current tools.... However, like with Karluk, the Department had in season closures on years when the BEG was eventually met..... this is an unnecessary disruption of business....

Comment: We need more fish in Karluk and I keep getting hung up on lower BEG..... if we keep lowering escapement goals (as we have twice in the last 5 or 6 years) and then add the lower OEG and allow a catch and release fishery, the cumulative impacts of it all may cause trouble.

Department responded to questions about development and change of the Karluk Chinook BEG over time

Comment: Is there a correlation between lower BEG and lower returns... perhaps we need a higher BEG.

_____ Transition to go around the room regarding the Koniag Proposal

Comment: Generally support concept but want to work on some of the details

Comment: Generally in favor of the OEG with a catch and release fishery. But, very very concerned with the use of bait... cause allot of mortality when using bait

Comment: I really want every Chinook up the river we can get..... However, doesn't seem that fair to have one user group to have the full burden of conservation, consequently I have some support for the idea an OEG with single hook barbless catch and release fishery. Don't support bait any time... Again, too much mortality with bait.

Comment: At the last board cycle the Tribal Council in Karluk proposed a no egg fishery with only artificial lure but Koniag opposed. Ironic that they are back just three years later with this proposal. If there is a sport fisher below OEG it will to minimize the impacts on the stocks.... Need successful management in the river Key concept to appreciate is that 100% of the spawning Chinook stock is vulnerable in the river for an extended period of time, this is 100% of the stock that can be fish, even with the catch and release proposal..... we absolutely need to minimize the mortality..... The data seem to indicate that the Chinook spend a month or more in two areas on the river..... this causes me even more concern regarding the vulnerability of the Chinook in the river to a catch and release fishery We need to protect some part of the spawning stock..... so the whole stock isn't vulnerable.... We need to insure every effort to reduce mortality..... Think about the number of permits daily and the number of days, this could be about 3,000 individuals on the river fishing ... potentially allot of effort...

Also note: even with the current closures the fishery doesn't really stop.... Still able to fish for sockeye and other species and consequently catch and release kings.... This is happening every year, even with the Chinook fishery is closed and results in some Chinook mortality! Only difference is that Koniag just can't advertise Chinook fishing, that's the only difference now I will consider the Koniag proposal but I want to drill into the design of the fishery... Look at the two areas that have Chinook ripen, we need to address these.

Comment: No bait in the river is critical. Prefer no bait period. Chinook fishing shouldn't be a meat fishery..... when folks use bait on the river and break fish off, mortality rate can be quite high..... should consider the same gear, barbless hook and no bait even after the BEG is met at least until there is opportunity to catch two fish, stair step back into the full fishery with bait.

Department: Under the draft management plan. Once the BEG is met and the in river fishery removals are accounted for, the full harvest sport fishery resumes The department uses an in season estimate of harvest to make the determination when the full retention and bait regulations go in. The Department, once the BEG is achieved, isn't faced with "management" any longer, you're talking about allocating opportunity. Keeping a no bait regulation is an allocation of angler opportunity.

Comment: The single hook, barbless, careful release etc... folks are comfortable with these ideas..... In some ways the system has been self regulating. When runs are slow folks don't participate... you can see participation is way down over the last few years.

Comment: There is another relationship between bait and mortality..... what is the bait? The bait is roe from king salmon.... Even careful catch and release, if using bait ... have to kill a female to get the bait for tomorrow.... Females are targeted to supply the bait.....a bait fishing also kills the females... Fished for many years and just don't favor any in river bait fishery for Chinook.

If the OEG is an important enough a concept to consider for the Karluk, the trade off should be no bait fishing period. I could support this.

Department: Note, in Chignik area a proposal to take bait out of the sportfish fishery.... Proposers, cite a conservation problem on the Chignik river Department doesn't see the conservation problem. Really see this more as allocation of opportunity. Don't talk about "no bait" in conservation terms once the BEG is met.

Comment: Why are we worried about "no Bait" if the Chinook escapement and estimated mortality is above the BEG?

Comment: I could make a big difference on the lower end, if the escapement is just over the BEG and the in river estimate. If a bait fishery starts, the 7% number is highly suspect and the collateral mortality could easily move the actual spawners below the BEG There needs to be a cushion before the full bait fishery is allowed, don't know if it's ever needed on the Karluk. But at a minimum, there needs to be a staircase of regulations after the BEG is met. First, perhaps, can use barbed hooks, then retain one fish, then use bait to retain one fish and the full bait, two fish fishery. When bait is used the mortality is really not known, other studies aren't parallel. Guided anglers and individuals handle fish differently..... we really don't know mortality.

Comment: The Karluk Chinook as a stock of concern... burden shouldn't just be on one user group each user group should put something forward..... look at the impacts of other users, the commercial salmon fishery, the saltwater sport fishery and the trawl bycatch. Everyone should have some conservation burden.

Comment: Koniag is not authorized to take eggs off the table if the BEG is met..... also, if above the upper BEG.... Supports increase bag limit to try to keep within the BEG... but will stick with the single hook and no bait until the upper end of the BEG.....

Comment: Big difference to switch from catch and release to bait.....goal is to get the 3,000 spawners or some other number through the weir.... I'd be more comfortable with the measure proposed if start retention up to some number to upper end of the goal and then at a higher number consider allowing use of bait.

Department: With the current draft management plan, on some occasions, can use tools to stairstep back into the full bait and two fish retained fishery ... now could step up but if go back to statute don't have the incremental tools..... catch and release or full on harvest that's all we can do If need flexibility, the plan wouldn't be necessary, if wanted the step up or step down... more detailed plan needed, the bag limit will be established at one rather than two fish per day at some number and then at another number the two fish retention and then at another number the use of bait etc.....

The idea relative to geography and looking for some protection for spawners ... if some portion of the river was not open when the run is projected to be low..... the whole stock is at catch and release anyway and the geographical limitation sort of creates a fish refuge....seems redundant with the catch and release and barbless hook provisions.

Comment: Limiting fishing to part of the river may compromise genetic pool.

Comment: The expanding fishery for Chinook on the Karluk river is the in river sport fishery and the salt water sport fishery. The commercial fishery is the long time user. Sport fishing is the new and expanding fishery

Back to details of Koniag Proposal"

The OEG can be a range as well..... we proposed $\frac{1}{2}$ of OEG but could expand beyond BEG for the catch and release provision and no bait, perhaps a range of 1,500 to 4,500:

Department: The approach would constrain ability to manage down to lower end of BEG..... THIS IS ALLOCATIVE

Comment: It doesn't need to be quite that rigid..... you have to plan to stairstep the provisions for full bait and retention... rather than just a single point with the full regs kick back in. Better to have a stairstep approach

Consensus recommendation to Advisory Committee: Forward the Koniag proposal with two options:

- 1. As Written**
- 2. As a range for the OEG that could allow the barbless hook, no retention, no bait provisions to be implemented above the BEG to some point, perhaps the 4,500 escapement number...**

Research/Management Plan:

1. First priority is to keep the current research/management program with the weir and weir sampling and fry studies in place. Could improve this to try to do more unguided angler interviews at the portage. Also important to have the weir in early in May, by the 20th or so. Stress this for the Department.
2. Need stock identification work for Karluk Chinook. Need to sample the saltwater sport fishery, the commercial salmon fishery (and not just the west side fishery) and the trawl bycatch. To track total stock mortality need better identification information. This is both difficult and expensive. (\$22.00 per sample for Buskin project) However, it is necessary if we really want to understand and address Karluk Chinook as a Stock of Concern.
3. Explore rehabilitation possibilities: Lots of hurdles to get over to drop eggs back in Karluk..... both money and other considerations. While we can't provide all the detail to a rehabilitation plan, it should be considered and developed. Recommend interest is some type of restocking program.

Note: KRAA is looking at sockeye production at Karluk. This may help Chinook with enhanced sockeye production.... Doesn't seem to have done any harm last time but can't correlate clear relationship between fertilization and Chinook enhancement.

4. Systemic studies to try to determine the root cause for the decline of Karluk Chinook.

Department: Need to divide inquiry into marine and fresh water stages..... and then design studies on the two life stages

Gary Wheeler --- for last two years the refuge has been trying to find juvenile king salmon in river, very difficult... also look at limnology, and water quality.

Department: Articulate that getting at the root cause is important! Restoration ecologists identify the root cause.

Discussion of proposed regulation modifications for other gear types

Commercial Salmon Fishery: Difficult to identify if Chinook caught are going to Karluk. Probability is that they are not, except, perhaps just adjacent to the river. Doesn't make sense to limit the seine fishery when high discard mortality. Chinook in salt water easily suffer scale loss etc..... mortality is high just to handle. The relationship between regulations in the seine fishery and actually saving Chinook in Karluk isn't there.

Comment: Can't ignore the number of Chinook taken in the commercial salmon fisheries.

Salt Water Sport Fishery: The salt water charter fishery is also expanding and allot of new effort in Uyak Bay. Should consider looking at catch information specific to the take of this fleet in Uyak Bay and up the west side. This fleet could more easily actually save Chinook if a hook and release requirement. Recommend looking at more information about this fleet and possible Chinook savings.

Trawl fishery – Very high priority for Trawl fleet is to avoid Chinook. The fleet is also constrained by sealion regulations. Working inhouse with co-op structure. Now have some hot spot reporting..... 1/3 of fleet with excluders with video monitoring.... Some success with excluders in the Bering Sea. Entire pacific rim is having problems with Chinook.... Not specific to a specific user group..... It is the highest priority at this point..... working with a cohesive group.... Have found that more Chinook with longer tows in a scratch fishery, better to fish when Pollock are concentrated would like to push seasons..... If more control over when and where they could fish, better avoidance of Chinook bycatch.

Most actions on trawl fleet will be through the NPFMC. Could recommend 100% retention and sampling as part of action plan.

Getting back to root cause is to recommend to the Board to communicate with the council regarding better observer coverage for vessels that have Chinook bycatch.....scale sampling may not be much more of a duty. Difficult to discard when good fishing.....generally discard salmon sharks and sleeper sharks..... Actions needed outside the authority of the Board..... To

Chinook "Stocks of Concern"
Local Advisory Committee Sub-Committee
December 22, 2010

RC 20

on Tracy Presentation:

Karluk History: New weir 1976 is low in river where all kings can be counted.... Old weir at lake.
Most Chinook spawn in the river.

Chinook escapement below in: 2001,2006,2007,2008,2009 and 2010

Escapement goal 3,600....to 7,300 --- this is calculated based on the weir count minus up river harvest..... The weir count is higher but adjusted for in-river harvest.

The escapement goal has changed over the years..... The goal was first established in 1984..... 4,500 to 8,000.
After Board adopted the Sustainable Salmon Fisheries Policy..... The Board mandated that every board cycle the Department needed to evaluate stocks.... If new information, then adjust escapement goals.

New escapement goal, established in 2005 3,000 to 6,000

1978-2002 = 4,500-8000

2003-2010=3,600-7,300

2011.....=3,000-6,000

In River Counting Issues:

Catch and release mortality?

What the Bears eat?

Question: Did fertilization impact Chinook? Seems to have had some positive impact but can't really tell.
However, it didn't have a negative impact that seemed fairly clear.

The biggest sockeye years, 2003 & 2004, were just intermediate returns for Chinook.

Slide 2 --- Closures to fishing over time

Public Comment: With the reductions and closures there has been virtually no "retained catch" fishing on the Karluk over the past 10 years. (Slide indicated some opportunities, but primarily in the years before 2007.)
Sport harvest drops below 1,000 from 2002-2007 with 0 harvest 2008-2010.

Slide 3 --- Spawning areas on river overlaid with sport fishing areas.

Each female has approximately 5,000 – 6,000 eggs

When taking eggs, used about 30 spawning females The Monashka program started with Karluk egg takes but these stopped in 2004 when the program became self supporting for eggs No take since then.

Possible management idea could be to limit in river fishing as far down as the portage or below and thereby save the spawners at the lake outlet, since most of the effort is at the portage and below anyway But, maybe first limit in the lagoon

Slide 4 --- Easement graph over time

Question: What is the Chinook catch effort in Lagoon..... not too much.

Outline of Conservation Easement Agreement:

Number of Angler days ... June 10th to July 16... limit to 70 anglers also can limit to number of guides
this could still be 2450 Angler days....

Currently, numbers are way down for permits..... Use of the river is regulated via permit but total possible permits, if all were used, is fairly high.

Slide 5 ----- Use by sport fishermen since 2002 when easement went into effect

Daily averages about 25 -30 with highs in the 60plus for a couple of days...

There is a correlation between angler days and success rates.....

Also use correlates to inseason restrictions..... see, 2005

Public Comment: Best idea is to have Karluk river as a catch and release only fishery and to build its reputation based on this type of management plan

Catch and Release Discussion:

Average caught and release ratio is about 4 to 1..... 3 released for each one kept. In 2001 almost every salmon caught was released.....

Release mortality data: Hypothetical hooking mortality scenario.... In Alaska use 7% as the hooking mortality... based on Kenai river... In other states different..... standards developed in other states the average for kings is 6% to 10%.....

Question: What criteria was used when the catch and release mortality study was done? Did they use bait, barbless hooks, single hooks or treble hooks?

Higher mortalities found in bait fisheries..... See Oregon study over 3 years..... no bait single hook down to 2 % but with bait up to 20.... Also much higher mortality when drifting eggs.... And higher mortality when not handled properly.

Note: 60% of permits issued within the conservation easement boundaries are for guided angling (anglers guided on Karluk)and fish handled more professionally.....

The hook and release mortality studies don't cover fish that have been hooked multiple times..... However, generally it is believed that the longer the fish is in the river, the more durable.... Related experience with Chinook during the egg takes.

Estimated by Koniag folks: If barbless hooks used with a 7% mortality for the season it is likely that the fishery would reduce the escapement by 80 to 100 fish. Is this significant out of 3,000? What does "significant mean"? Wide range in escapement goal, but biologically it may not have a large impact. The fact that ADFG has had 3 escapement goals in effect during the past 10 years, with the lower end of the range varying from 4,500 to 3,600 to 3,000, shows how difficult it is to access the proper number of spawning fish to generate MSY.

Question: Who regulates gear on the river? With single hook, barbless hook. bait and/or treble hooks? The gear could be in regulation by Board of Fish or could be based on other criteria and imposed by local management.

Public Comment: Most of Karluk Chinook are in the river during the sportfish fishery and they are exposed to fishery for long period of time..... if 60% or 70% of the run is being released, that is total fish released then mortality could easily be higher than 7% with multiple catches of same fish.

Note: Higher mortality rate in salt water..... It is likely that there would be a higher mortality rate in lagoon Before the Chinook acclimate to fresh water. Eggs not generally used in lagoon but this would also increase

mortality rate.

The State could impose a restriction to use barbless hooks on the Karluk. Just bend over the barb, doesn't have to be available to have the regulation.

Inriver variables that impact catch and release mortality:

1. Place in River
2. Time of Fishery
3. Number of permits/Anglers
4. Bait
5. Single vs. treble hook
6. Barbless hooks
7. Handling Protocol

Question: What is the expected return per spawner for Chinook. What do you expect at Monashka? Answer: Hard to tell, Smolt survival to adult for kings is 1-3% but not getting that high at Monashka, don't know what actually getting..... first full brood table for Monashka in 2010.

Break:

Action Plan discussion regarding Len Schwartz's hand out.... See outline and definition

Commercial Side

Jeff Wadle said that he saw the draft Action Plan and it contained 3 options for commercial fisheries restrictions designed to increase king escapement: Offer something to the committee.... Things they have tentatively come up with.....

Three options provided to Board:

- a. Status Quo... current regulations.... Non-retention inner and outer Karluk -- same size restriction of 28'.
- b. Non-retention west side of Kodiak, seine gear only. Include N.W. Kodiak District and inner and outer Karluk. (July 15th) Non-retention west side of Kodiak for all gear types.

What are the triggers?

What is mortality of Chinook with gillnet gear. Suggested Very high for set nets 95+ %.... Perhaps 70% for seiners.....

Sport Fish Departmental Recommendations:

1. Use emergency order authority to manage the Sport Fishery. ... time line for in season restrictions.

Comment: Need to look at nuances to give the Department some direction..... some measures may need to be in regulation..... Department concerned about getting into social aspects of management.....

Koniag's Recommendation to the Committee: See handout.

Key Concept: Create an Optimal Escapement Goal that is 1/2 of BEG and allow catch and release fishing when the OEG is being met.

Support: The OEG balances the conservation burden..... now the sport fishery is the only fishery to have a significant conservation burden.

Question: Where has this been done? What precedent could be set?

Stennan KRAA : It has happened in early run Upper Station in Commercial fishery.... OEG less than the

BEG..... Set an arbitrary level that was about 50%... actually it was a SEG, sustainable escapement goal.....

NO precedent for 50%, no other OEG's known in State... however there are some "in river" goals....

Idea is to look at OEG on a case by case basis, might not want to allow an OEG for catch and release in high use easy to access fisheries. Karluk and Ayakulik are unique because they are remote, hard and expensive to access, already have some sport fish effort restrictions.....

For stock of concern, what is part of the action plan, what is the sustainable goal for Karluk Chinook. One of the things we need to do is to talk about research..... what is the minimum research needed..... We'll need to make research recommendations as a committee..... The OEG has to be sustainable....

Current research plan: Continue weir sampling, monitoring sport fishery with angler interview and investigate a sustainable escapement goal..... SEG...

Question regarding Ayakulik "finding" of Stock of Concern. Due to 2010 escapement, not consider this cycle. Many of the folks on the Ayakulik, don't want to increase bag limit if escapement goal met, don't want a meat fishery...

Ayakulik: escapement goal was missed 3 times and achieved 2 times during the past 5 years, so it does not qualify as a management stock of concern. The Ayakulik sport fishery however was closed in 2007 and 2010, even though the escapement goal was achieved. In hindsight, these closures were unnecessary and disruptive. Therefore, Ayakulik guides support an OEG that allows ADFG to put the fishery on catch and release, instead of a complete closure. At the last BOF Ayakulik guides and fishermen submitted 4 proposals to adopt a catch and release OEG instead of complete closures. At the request of the Ayakulik users the BOF adopted a finding 9 years ago that directed ADFG not to increase the bag limit when the escapement goal is exceeded. They did not want to promote a "meat" fishery. This finding complements their desire for catch and release instead of complete closures-which have turned out to be unnecessary since the goal was achieved when fish arrived late.

Comment: Hook size is important to mortality..... no spoons or spinners..... single hook is what is needed...

Comment:

Need to look at interim management directives..... establish bench marks in management plan..... As to how to open the season..... still an issue what benchmarks to use.....

Question of Subsistence: How does subsistence relate and how would the Refuge evaluate the catch and release proposal relative to subsistence If close subsistence due to BEG and then open catch and release because of an OEG... Not consistent. Response: The catch and release doesn't keep any fish, by definition subsistence keeps fish. Consequently, not uneven regulation. Both subsistence and retention for sport fish would be based on the BEG.

Question on Male/female ratio. In river almost always 50/50 over season. However, below 28' (those retained by seine fishery) most will be males....

Directive for next meeting: Think about Ideas for the Commercial side and trawl side.

Remember the run timing is later..... perhaps by about 10 days to two weeks...

Need to add a stock identification component to research model and recommendations ...

Next Meeting Wed. December 29th.... 7:00 p.m.

**Kodiak Fish and Game Advisory Committee Workgroup
Karluk River King Salmon Stock of Concern**

Appointed December 16, 2010

Workgroup meeting: Dec. 18

Chair: Duncan Fields (AC)
Seiner: Oliver Holm (AC)
Subsistence: Andy Finke (AC)
Set Net: Kip Thomet (AC)
Sport Fish Salt Charter: .. Chris Fiala/Chaco Pearman
Karluk River Sport: Mike/Tim/Lisa Carlson
Trawl: Curt Waters (AC)
Koniag: Charlie Powers
KRAA: Kevin Brennan

Agency Support:

ADFG: Sport Fish: Donn Tracy
ADFG: Comm Fish: Jeff Wadle
KNWR: Kevin Vanhatten

Others Present: Len Schwarz (Koniag),

**Kodiak Fish and Game Advisory Committee
Stakeholder Work Group for
Karluk River King Salmon Stock of Concern**

Regulations dealing with Stocks of Concern are found in Title 5 of the Administrative Code, Chapter 39, Policy for the management of Sustainable salmon fisheries (5AAC 39.222)

Charge

Seek consensus and/or provide options to accomplish 4A-E and 5 below.

The information below will be presented to the Kodiak Advisory Committee for consideration and submission to the Board of Fisheries as recommendations on what the Karluk River King Salmon Stock of concern Action Plan should contain.

(4) in association with the appropriate management plan, the department and the board will collaborate in the development of an action plan for any ...stocks of concern; action plans should contain goals, measurable and implementable objectives, and provisions, including

(A) measures required to restore and protect salmon habitat, including necessary coordination with other agencies and organizations ✓

(B) identification of salmon stock or populations rebuilding goals and objectives

(C) fishery management actions needed to achieve rebuilding goals and objectives, in proportion to each fishery's use of, and hazards posed to, a salmon stock;

(D) descriptions of new or expanding salmon fisheries, management concern, yield concern, or conservation concern

(E) performance measures appropriate for monitoring and gauging the effectiveness of the action plan that are derived from the principles and criteria contained in this policy; **39.222.(c)(2)(B)salmon escapement goals... should be established in a manner consistent with sustained yield; ...the department will manage Alaska's salmon fisheries...for maximum sustained yield;*

(5) each action plan will include a research plan as necessary to provide information to address concerns; research needs and priorities will be evaluated periodically, based on the effectiveness of the monitoring described in (4) of this subsection;

**Preceding Regulations to Stakeholder Work Group Charge
And Definitions**

39.222 (d) *The principles and criteria for sustainable salmon fisheries shall be applied, by the department and the board using the best available information as follows:*

(1) *at regular meeting of the board, the department will provide the board with reports on the status of salmon stocks and salmon fisheries under consideration for regulatory changes, which should include:*

(D) (ii) *identification of any salmon stocks or populations within stocks, that present a concern related to yield management, or conservation; and*

(iii) *description of management and research options to address salmon stock or habitat concerns.*

(2) *in response to the department's salmon stock status reports, reports from other resource agencies, and public input, the board will review the management plan, or consider developing a management plan, for each affected salmon fishery*

(3) *in the course of review of the salmon stock status reports and management plans described in (1) and (2) of this subsection, the board, in consultation with the department, will determine if ...stock conservation concerns exist; if so, the board will amend or develop salmon fishery management plans to address these concerns; the extent of regulatory action, if any, should be commensurate with the level of concerns and range from milder to stronger as concerns range from.....and conservation concerns;*

Definitions

(f)(6) *"conservation concern" means concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a stock above a sustained escapement threshold; a conservation concern is more severe than a management concern;*

(5) *"chronic inability" means the continuing or anticipated inability to meet escapement thresholds over a four to five year period, which is approximately the generation time of most salmon species;*

(3) *"biological escapement goal" or "(BEG)" means the escapement that provides the greatest potential for maximum sustained yield; BEG will be the primary management objective for the escapement unless an optimal escapement or inriver run goal has been adopted; ...DEG will be determined by the department...*

(25) *"optimal escapement goal" or "(OEG)" means a specific management objective for salmon escapement that considers biological and allocative factors and may differ from the BEG; an OEG will be sustainable andand will be adopted as a regulation by the board.....*

(1) *"allocation" means the granting of specific harvest privileges, usually by regulation, among or between various user groups: "allocation includes quotas, time periods, area restrictions, percentage sharing of stocks, and other management measures providing or limiting harvest opportunity;*

WORK SHEET

(4) in association with the appropriate management plan, the department and the board will collaborate in the development of an action plan for any ...stocks of concern; action plans should contain goals, measurable and implementable objectives, and provisions, including

(A) measures required to **restore and protect salmon habitat**, including necessary coordination with other agencies and organizations:

(B) identification of salmon stock or populations **rebuilding goals and objectives**:

(C) **fishery management actions** needed to achieve rebuilding goals and objectives, in proportion to each fishery's use of, and hazards posed to, a salmon stock;

(D) descriptions of new or expanding salmon fisheries, management concern, yield concern, or conservation concern

(E) **performance measures appropriate for monitoring and gauging the effectiveness of the action plan** that are derived from the principles and criteria contained in this policy; *39.222.(c)(2) (B)salmon escapement goals... should be established in a manner consistent with sustained yield; ...the department will manage Alaska's salmon fisheries...for maximum sustained yield;

(5) each action plan will include a research plan as necessary to provide information to address concerns; research needs and priorities will be evaluated periodically, based on the effectiveness of the monitoring described in (4) of this subsection;

RC 21

January 10, 2011
Comment for State Board of Fish

My name is Eva Holm. I live in Kodiak and started set netting here in 1969. I would like to comment in opposition to proposal #71.

In 2008, despite an 11 to 1 vote by the local advisory board against proposal #58 and testimony predominately in opposition, the Board of Fish decided to allow one permit holder to hold and operate two set net permits and a total of 300 fathoms or two complete limits of gillnet gear. Proposal #71 would make this permanent.

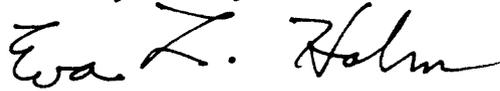
If this plan remains in place we could end up with half the original number of permit holders without any demonstrated need to reduce permit holder numbers. This means that all the profits that are attached to permit ownership will go to fewer and fewer people. Up until adoption of proposal #58 almost all of the available set net permits were fished every year and there were rarely any offered for sale. Isn't that an indication that the fishery was economically healthy and viable as it was? In the process of deciding whether or not to permanently adopt this permit stacking plan will there be any official analysis to determine what the overall affect has been or will be in the future? Alaska's constitution mandates that a limited entry system is better when it includes more participants rather than fewer.

Unlike the Kodiak set net fishery, the Bristol Bay region has been determined to have too many permits and there are efforts to reduce the number of participants. Previous to the adoption of proposal #58, Kodiak permit holders can and did go to Bristol Bay and fish as crewmembers and come back to Kodiak to fish their Kodiak sites. Now they can legally purchase and fish their own Bristol Bay boat and permit and leave their permits here fishing in someone else's name. This means they profit from permit ownership in both areas contributing to Bristol Bay's problem of too many participants and taking profit from Kodiak's fishery that might have benefited someone else. This is an interaction between regions and negative allocative effects of proposal #58 on other fishermen who do not have the dual permit option.

My set net operation has only one permit. Another one for my daughter would be nice. I feel that proposal #58 allowing permit stacking is detrimental to others and me in my position because there will be less permits for sale and the purchase price has gone up considerably. But the more important question is how will it affect new entrants to and future participants in this fishery. With fewer one permit set net sites for sale it will be harder for new entrants to find the capital to get started. A site with two permits will cost quite a bit more. There has been a lot of talk lately about trying to keep fishing rights in the hands of the people who do the work. This proposal will have the opposite affect. It will grant fishing rights to family members who have no intention of ever going out in a skiff to pick fish or even come to the state.

If permanently adopted this proposal would have serious affects on our fishery and by precedent possibly on the rest of the State. It deserves more research to avoid unintended consequences. Please don't adopt it merely because of the convenience it offers some multi-permit sites with temporary problems.

Thank you for your consideration.


Eva L. Holm

RC 22

To: State of Alaska Board of Fish
From: Susan Jeffrey, co-owner of Kodiak family setnet site
Re: "Proposal 71 – 5 AAC 18.331.1 Gillnet specifications and operations"

I oppose "Proposal 71 – 5 AAC 18.331.1 Gillnet specifications and operations" for the following 10 reasons:

1. The proposal allows for a *dramatic reduction of the Kodiak salmon setnet fleet from 188 permit holders to 94*. This creates a fishery that is **too exclusive**, which is prohibited by the State of Alaska's constitution.
2. The proposal:
 - a. Overrides local and state interests for the benefit of current permit holders;
 - b. Was created solely to protect the economic interests of current permit holders;
 - c. Was not created due to concerns about salmon conservation;
 - d. Does not address the potential negative impact of further consolidation of the salmon fishery on the Kodiak region;
 - e. Presents no evidence that the CFEC or the Commissioner of Fish and Game feared for the economic and environmental health of the Kodiak salmon setnet fishery.
3. Permit stacking in the Kodiak salmon setnet fishery *further limits entry into the Kodiak salmon fishery* without going through the process required by the State of Alaska to limit or further limit entry into a state fishery.
4. The proposal results in consolidation of the fishery, which severely *reduces new entrants into the salmon setnet fishery*.
5. The proposal results in the consolidation of the Kodiak salmon setnet fishery, which *reduces the number of available crew jobs*.
6. Permit stacking in the Kodiak salmon setnet fishery is unjustified: There is no evidence that Fish & Game supports the need to consolidate the Kodiak salmon setnet fishery because of over-capitalization of the setnet fleet.
7. Permit stacking in the Kodiak salmon setnet fishery is unjustified: There is no evidence that Fish & Game supports the need to consolidate the Kodiak salmon setnet fishery because of concern about conservation management of the fishery.
8. The proposal does not reduce the amount of fishing gear in the water.
9. This proposal, in essence, *results in a pooling of permits*, which the State Supreme Court has struck down.
10. This permit stacking proposal sets a *dangerous precedent for coastal communities*: No economic impact analysis was conducted to study the affects of consolidating the Kodiak salmon setnet fishery on the community of Kodiak and/or the Kodiak Island Borough.