

RC 143

SOUTH K BEACH INDEPENDENT

FISHERMEN'S ASSOCIATION

P.O. Box 1632 Kenai, Alaska 99611-1632 (907) 283-5098
Protecting and Preserving the Kasilof River Aquarian System

February 4, 2014

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: Cook Inlet Regulatory Meeting 01.31- 02.13/14

Proposal 209

Chairman Karl Johnstone,

We are opposed to any restrictions to the number of vertical web that we can use in our fishery. Please read the Department of Fish and Game's recommendations in 2011 and 2013. In the Kasilof District the majority of the gear fished is of a five inch diameter. SOKI would agree to a web size diameter of no more than 5 inches to lessen the chance of harvesting large king salmon. Genetics reports suggest that less large kings are harvested in the Kasilof area vs. the Kenai District. This could be because of the use of smaller size web and its bounds of selectivity.

We would have the BOF review the signatures on RC 126,127 and 128. These signatures from setnet permit holders "only" are from all area of the ESSN beaches. Please consider that these individuals are willing to explore reductions of opportunity by limiting time and area.

SOKI is supporting several step down measures in times of low abundance based on; openings of a maximum of 48 hours per week, three week intervals of directed fishing time for each statistical areas, one 12 hour period per week outside of the directed weeks of fishing for that area, area restrictions of .5 miles and or 600 ft within the Kasilof District to harvest Kasilof sockeye and to lessen king salmon interception.

We believe that these limits on opportunity should only apply when necessary in that the forecast of LRKRK remains above the 15,000 SEG but these indications by June 25 predict near the lower goal. No closures of the ESSN can occur until after July 23rd which is the historical mid-point of the run.

Thank you,



Paul A. Shadura II

2013 ESSN Chinook Age composition by time and section

	Age			
	1.1	1.2	1.3	1.4
Kasilof Section, 27 July-6 July	48%	30%	12%	10%
Kasilof Section, 8-15 July	26%	51%	11%	12%
Kenai Section, 8-15 July	28%	52%	8%	12%
Kasilof Section, 18-23 July	16%	54%	14%	16%
Kenai Section, 18-23 July	10%	46%	18%	26%
Kasilof Terminal, 17 July - 2 August	13%	19%	35%	33%

2013 Kenai Chinook Inriver gillnetting (midriver only) age composition

	1.1	1.2	1.3	1.4
Inriver gillnetting (midriver only), 1-15 July	3%	41%	19%	36%
Inriver gillnetting (midriver only), 16-31 July	2%	24%	27%	47%
Inriver gillnetting (midriver only), 1-17 August	0%	18%	29%	53%

2013 Kenai Chinook sonar passage estimates by age

	1.1	1.2	1.3	1.4
1-15 July	172	2,060	944	1,803
16-31 July	158	1,894	2,210	3,788
1-17 August	0	704	1,173	2,111

2011 Upper Cook Inlet Department Comments

PROPOSAL 116 - 5 AAC 21.331. Gillnet specifications and operations.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO? This proposal would require set gillnet fishermen in the Kenai area to replace their 45-mesh nets with shallower 29-mesh nets, reducing net depth by 35%, or eight feet.

WHAT ARE THE CURRENT REGULATIONS? A set gillnet may not be more than 35 fathoms in length and 45 meshes in depth, with a maximum mesh size of six inches.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? This proposal would reduce the harvest of sockeye and king salmon by an unknown amount. This proposal would also reallocate fish from the outer nets to the nets closer to shore. Lowered catch rates because of shallower nets may lead to significant passage rates of sockeye salmon, reduce the ability to manage large pulses of salmon, and could lead to escapements above sustainable and biological escapement goals. Although inriver harvests may increase for a few years, reduced production would likely lead to reduced fishing opportunities for all users in the future.

BACKGROUND: The current depth restriction of 45 meshes has been in effect since at least statehood. The department has attempted to study the effects of net depth on catch by species. A preliminary study to look into vertical distribution of the catch by species was conducted in 1996. The report generated from this study concludes "Results from this study were to provide the basis for recommending and designing future studies. It was not designed to directly suggest potential management or regulatory actions." The main limitation of this study is the way the catch was recorded into either the upper two-thirds or the lower one-third of the net. Had the study recorded which one-third or smaller increment of the net each fish was caught in, it would likely have resulted in a conclusion that both the lower and upper one-thirds of the net catch fewer fish and that most fish are caught near the middle, both vertically and horizontally. This would have occurred no matter how many meshes were used due to the net bending (bagging) with the current. The difference in harvest rates between sockeye and king salmon caught in the lower one-third was 25% for sockeye and 36% for king salmon. The range, however, was from 11% to 52% for sockeye salmon, and from 7% to 65% for king salmon. Another limitation of the study was that roughly 80% of the "sets" did not capture a king salmon; applying the average could have the opposite effect from what is desired. Finally, all study sets were restricted to approximately four to five miles on either side of the Kenai River. The Kasilof Section may have vastly different results from a restriction of this nature. Due to that study's high level of measurement error, limited sampling, low number of king salmon observed, limited area of study, and use of voluntary sites, there is a high level of uncertainty in the outcome of setting a maximum depth at 29 meshes, especially outside the study area.

In the previous 10 years (2001-2010), the Kenai River late-run sockeye salmon inriver run goal has been exceeded six times, within the goal three times, and below the goal once. The Kasilof River biological escapement goal has been exceeded nine of 10 years, while the optimal escapement goal of 150,000 to 300,000 sockeye salmon has been exceeded seven times and within the goal three times, including 2009 and 2010 (Table 116-1).

2011 Upper Cook Inlet Department Comments

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. However, this proposal may require the department to deviate from the management plan by emergency order to achieve established escapement goals as directed under 5 AAC 21.363(e).

COST ANALYSIS: Approval of this proposal would result in an additional direct cost for a private person to participate in this fishery. Resources would have to be spent on either changing current nets or purchasing new nets.

king salmon conservation, and would likely increase the amount of fishing time and harvest of sockeye salmon for the drift gillnet fishery.

BACKGROUND: The regulation for the length and depth of a set gillnet gear has been the same since statehood. The regulation restricting mesh size to six inches was adopted in 1964 to decrease the harvest of king salmon and direct the harvest on sockeye salmon. A preliminary study to look into vertical distribution of the catch of king and sockeye salmon in set gillnets near the mouth of the Kenai River was conducted in 1996. The report generated from this study concludes "Results from this study were to provide the basis for recommending and designing future studies. It was not designed to directly suggest potential management or regulatory actions." The main drawback of this study is the way the catch was recorded into either the upper two-thirds or the lower one-third of the net. Had the study recorded which one-third or smaller increment of the net each fish was caught in, it would likely have resulted in a conclusion that both the lower and upper one-third of the net catch less fish and that most fish are caught near the middle, both vertically and horizontally. The difference in harvest rates between sockeye and king salmon caught in the lower one-third is 25% for sockeye salmon and 36% for king salmon. The range, however, is from 11% to 52% for sockeye and from 7% to 65% for king salmon. Another problem is that roughly 80% of the "sets" did not have a king salmon; applying the average could have the opposite effect from what is desired. Finally, all study sets were restricted to approximately 4–5 miles on either side of the Kenai River. The Kasilof Section may have vastly different results from a restriction of this nature. Due to the high level of measurement error, limited sampling, low number of king salmon observed, limited area of study and use of voluntary sites, there is a high level of uncertainty in the outcome of setting the maximum depth at 29 meshes, especially outside of the study area.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this allocative proposal. The department supports a review of the management plan, particularly in regard to low levels of king salmon abundance. There are inadequate data to predict the effects of a depth restriction to 29 meshes.

COST ANALYSIS: Approval of this proposal would result in additional direct costs for Upper Subdistrict set gillnet permit holders to participate in this fishery because they would have to reconfigure their nets to meet the new maximum depth restrictions.