

**On Time Advisory Committee Comment List
Alaska Board of Fisheries Work Session
October 9–10, 2013**

Nushagak Fish and Game Advisory Committee	AC 01
Tanana Rampart Manley Advisory Committee	AC 02

Nushagak ADFG Advisory Committee
Excerpt of Meeting Minutes for BOF Work Session

September 17, 2013

Dillingham City Council Chambers

Full Minutes Available upon Request

****** 12:30 BREAK for lunch. ******

1:08 pm Resume Meeting.

Some members had to depart for other duties.

Excused: Robert Heyano, Joe Chythlook

Members present:

Chris Carr - on phone

Louie Alakayak - on phone

Present in chambers:

Kurt Armstrong

Tom O'Connor

Frank Woods

Gary Cline

Glen Wysoki

Peter Christopher

Dan Dunaway

Quorum re-established.

There was a general discussion and consensus to set aside joint board proposals to address ACR's while upriver members are still present.

Discussion of Agenda Change Requests (ACR) - they are not proposals but a request to Board to form a proposal.

Only a few address Southwest Alaska 6, 12 & 14. No oral testimony will be allowed at BOF Work Session, AC must send written testimony, due September 25. Online comment process explained.



BOF WORK SESSION ACR's

ACR 6] Commercial dipnets statewide. Tom Move Dan 2nd

Discussion: Some members concerned / object how this might affect Bristol Bay fisheries. Others had heard commercial dip nets were used on the Yukon this summer as the only option for a commercial fishery so kings could be released. Then proposal should not be statewide but limited to particular areas where needed and likely to work. Article in Bethel paper might have suggested trying dip nets in the Kuskokwim. We don't need a statewide regulation just because it works somewhere. Might support it for areas where extreme conservation is needed - we don't need it here. **Strongly Opposed Unanimous statewide.**

ACR 12 & 14] Repeal some of the single hook and bait restrictions adopted in December 2012 for the Nushagak drainage sport fishery. Joe Move, Dan 2nd.

ADFG comments that both ACRs seem to be confused on the bait regulation. Current regulations allow bait EXCEPT after a person who is fishing kings has kept their second king for the day.

Discussion: Authors of both ACRs acknowledged they were mistaken when composing their requests and wanted to clarify that the main concern is the all year single hook restriction. Both authors heard numerous complaints about this new regulation and wanted to be sure an ACR was submitted in time. To clarify they would like to leave the single hook regulations in place for the May 1 to July 24/31 chinook salmon season(s) but for the rest of the year, return to the sport regulations that existed prior to December 2012.

The strong king runs in the Nushagak and lack of a real conservation concern for them or any other species was frequently brought up.

Upriver rep said some villagers use sport gear for resident species in the spring prior to the king season - amounts to very low impact but important subsistence harvest.

AC members recalled that they originally proposed single hooks only for the king season. The original intent of this was to conserve kings.

The Nushagak AC would really appreciate the Boards reconsidering this regulation.

Support both ACRs 12, 14 (change to May- July single hook) Unanimous.



Alaska Board of Fisheries, Work Session, October 9-10, 2013 Girdwood

Tanana Rampart Manley Advisory Committee

Comments on ACR 4

ACR4 – Establish monofilament purse seines as a new legal gear for the Yukon Area districts 1-3 commercial summer chum salmon fisheries.

The TRM Committee strongly **OPPOSES** this agenda change request.

A note about the TRM AC: TRM is made up of commercial and subsistence fishermen. We do not oppose commercial fishing and we support efforts to harvest sustainably the fisheries resource. TRM has submitted numerous proposals in the past to the BOF to alleviate what our AC saw as steeply declining King Salmon numbers and size on the Yukon River, over many Board cycles.

We find it ironic that after all these years, ADF&G management of King salmon is now mirroring the letter and spirit of most of those failed proposals. Pulse protections, 6" mesh only, and Windows are just some examples. Had timely action been taken on these issues instead of bending toward the fears of "wasted commercial opportunity" or "too many fish on the spawning grounds", all fishermen might be in a better place now.

On the matter of "too many fish on the spawning grounds": there is no documented proof of this happening except possibly in the case of Red Salmon in lakes of limited size. And yet, this nonsensical non-scientific argument is trotted out over and over again as a pressure technique to justify why we should immediately exploit a fisheries resource up to (and possibly beyond) its carrying capacity. This statement should be understood and branded as the falsehood that it is.

We feel that the pressure groups who are proposing ACR4, (and who have some real shared responsibility for the decline of the King Salmon through over-exploitation), are moving with unseemly haste to quickly exploit what species remain, and the devil take conservative management.

There is clearly no conservation emergency here to justify the Board considering it as an ACR. No fish will die if nothing is done with this proposal. The only perceived emergency is within the Lower River lobbying group that is putting forth this proposal-- to create a new fishery method as quickly as possible to vacuum up every fish of value that they can as soon as they can. They favor techniques of a continuous barrage of quasi-scientific sounding proposals in the hopes that something will hit a target sooner or later. One hopes that by this time the Board of Fisheries recognizes these pressure techniques for what they are.

Reasons for opposing ACR4:

1. Purse seines in the Yukon River are completely untested gear as to the harmful effects on unwanted by-catch species caught in them. In this case we are talking Chinook salmon which we believe



are partly in this low state because of a lack of past management care, with a continuing downward trend in abundance and loss of the older age classes.

We find appalling the further lack of care expressed in this ACR4 . Chum Salmon, King Salmon and other species are netted – using power boats towing seines, then pursed together (again they request power if needed), and held an indeterminate length of time. Then, the King by-catch is separated and handled in some unspecified manner, and then are expected to swim 1200 miles to the Canadian Border and beyond to spawn vigorously.

We are told in this ACR request that fish held in these purse seines have an immediate mortality of near zero. This statement is very misleading at best. Experimental gear types, including purse seines with seine-type material (not mono) are being studied in the Columbia River as a means to release non-targeted species. *These studies are on-going, with interpretation of results confounded by many factors, including length of the drainage, mixture of stocks, and unknown fates of some tagged individuals.* (John North, Oregon Department of Fish and Wildlife, personal communication). **The lobbying group proposing ACR4 in fact cherry-picked data from this ongoing study to support their desired outcome.**

Fishwheel live-box holding of chum salmon in more un-crowded and more controlled conditions than a purse seine could ever achieve , for periods as little as an hour, showed greatly reduced travel and higher mortality rates, compared to chum caught, tagged and immediately released. Two published papers on these studies and three technical papers by the USFWS can be found at:
http://rapidsresearch.com/html/capture_mortality__.html

What the important issue here is: will fish held in crowded conditions, such as a seine, make it to successfully spawn? Prior to the live-box studies everyone thought fish held in live-boxes made it fine; we now know that is not the case This ACR request can produce no more scientific data on the subject other than to say: the fish look fine after being seined, so let us do it.

2. None of the above issues have been anywhere near answered in ACR4, yet the proposal places us in imminent danger of allowing what remains of the King Salmon run to take second place again to shortsighted commercial interests, all in the name of it being a shame that Chum Salmon are not able to be fully utilized. These commercial interests were the same people and groups that came before the Board of Fish in 2001, 2004, 2007 and 2010 and fought against the King conservation proposals we and other AC's had submitted.

3. The idea of increased commercial fishing on the incidental harvest (and there would be) of whitefish species is alarming. Because of the King Salmon crisis, whitefish have now become in some sections of the river the only fish available during the summer season for subsistence food. For years increased commercial whitefish harvests have been carefully looked at as an idea, with caution expressed by researchers and subsistence fishers. Studies have been proposed to assess the effects of a harvest increase and assess populations with the needed accuracy to make BOF decisions in this area. Again, the spur-of-the- moment pressure by this ACR is not the place to force this decision. King Salmon as well as many species of whitefish are at stake.



4. Purse seining as it is classically understood is a stationary way to fish. The vessel makes a set in a circle around the fish, or holds a half-circle against a very slow (approximately 1 knot) current, off a cape or ocean beach. The entire set does not “move” over the bottom except to close the circle.

With two boats seining in a river, it is possible to make a u-shaped trap for fish that with the combined speed of the current plus the ability of the two boats to tow downstream, can move the 600 foot net (the proposals requested minimum) over the bottom at up to 5 or 6 knots. Then add the speed of the fish migrating upstream: **this is not a Seining operation, this is a highly efficient Trawl that is being called a Purse Seine.**

5. Monofilament by its thin strength is highly injurious to fish—it cuts into fish and damages their parts, no kind of situation for catch and release. Monofilament is never used in any fish sampling or testing procedures, even for netting one fish at a time, if the fish is to be released.

In summary, as stated in policy the Board of Fisheries will accept an agenda change request only:

- a. for a fishery conservation purpose or reason;
- b. to correct an error in a regulation; or
- c. to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The ACR4 itself states that “b.” and “c.” are not applicable.

That leaves “a.”, for conservation reasons. **To argue that this ACR is for conservation would mean rejecting the fish-holding mortality studies out of hand, rejecting the experience of those who have seen purse seining in action, rejecting the longtime ban on monofilament for good and well-known fish conservation reasons, and rejecting objective scientific proof as well as plain common sense.**

This is in fact an **anti-conservation proposal**, and we hope the Board of Fisheries would recognize it as such and reject it.

Thank you for considering our comments and information.

Tanana Rampart Manley Advisory Committee

