Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

RC 014

Kodiak Board Meeting (Proposal 63)

10 Jan 2017

Dear Alaska Board of Fisheries Members,

We have been guiding fly fishermen on the Ayakulik River on Kodiak Island for over 25 years. The Ayakulik River is located on the southwest side of Kodiak Island. In the 1980s thru the mid 2000's, the Ayakulik River was considered a premier Alaskan River for Chinook salmon for fly fishermen throughout the world (Orvis Magazine rated it among the best in the world). Now, it is barely producing a sustained Chinook salmon run and has fallen from the ranks of world class fly fishing rivers. Therefore, the six sports fishing outfitters, Ayakulik Native Corporation, and lodges (Ayakulik Adventures and Ayakulik River Lodge) have been severely economically harmed. The corresponding support companies have also been affected (Sea Hawk Air, Andrew Air, Island Air, Maritime Helicopters, Kodiak Hotels, Safeway Groceries, and etc.)

We are informing you of the devastating effect of the Alaska Department of Fish and Game's (ADF&G) allocated use of the method of allowing the Kodiak Island fishing fleet to have the Ayakulik River stream terminus open thus "corking" (setting fishing nets across the mouth of a river entrance to catch all fish from entering the river, see picture Tab 1) the mouth of the Ayakulik River during the Sockeye run which coexist with the Chinook salmon run. This "corking" method is a great tool for ADF&G to prevent excessive over escapement of a salmon species into a river or lake which could cause irreparable damage to SEG and BEG goals. However, to use this "corking" method for a mixed salmon runs such as Sockeye and Chinook may not be a good example, especially, when a salmon stock (Chinooks) are in decline as on the Ayakulik River. "Corking" prevents any escapement of Chinook salmon. Studies show that a Chinook salmon has a 70% survival rate after being released from seiner nets and tossed gently back into the ocean. I submit that they have a 0% survival rate after being recaptured in several nets during a "corking" event of the Ayakulik River (see picture Tab1). The Council was concerned for the Chinook salmon stock in 1990 and wrote a concern statement after a large increase in Chinook salmon bycatch of the trawl fleet entry into groundfish (Tab 2, Final Council motion). In 2014, ADF&G opened the Ayakulik River terminus from June 5 thru 15 to the seine fleet to prevent an over escapement of Sockeyes and "corked" the river for eleven straight days. The fleet of over 32 seiners captured a total of 88,703 Sockeyes within the Inner Ayakulik Section. Only 110 Chinook salmon passed through the weir during this eleven day period and 789 total Chinooks escaped for the season (the lowest escapement in history since the weir was established at its current location in 1970). Moreover, not harvesting the 88,703 Sockeyes by "corking" would probably resulted in a higher Chinook salmon escapement BEG! Once again the Chinook goals were not met and the decline continued. But, when no commercial fishing within the Inner Ayakulik sections and "corking" did not exists for the entire 2016

Amy Fredetta

Sockeye/Chinook season, the Chinook lower escapement goal of 4,000 was achieved with a total final Chinook count of 4,594.

We believe that ADF&G should err to their own policy of "actively restoring declining stock populations", rather than "corking" the river during times of Chinook salmon arrivals. We wonder why ADF&G are so concerned about exceeding the upper escapement goals for Sockeye escapement to Red Lake? Higher escapements of Sockeye salmon in previous years did not seem to harm the future Sockeye runs or stock. Their biological studies (Dec. 2007 Biological and Fisher-Related Aspects of Over escapement in Alaskan Sockeye Salmon, Special Pub No. 07-17) indicate the escapement requirements are "arbitrary and without proper scientific/biological consensus among the fishery biologists." The paper recommends "further research...between spawner abundance and future productivity to set proper escapement goals." The escapements for Sockeye salmon for the past 15 years have been managed on the lower to mid-range of Sustained Escapement Goal (SEG).

ADF&G's policy for the management of sustainable salmon fisheries (5 AAC 39.222, attach. 1, tab 3) reads: depleted salmon stocks should be allowed to recover or, where appropriate, should be actively restored; diversity should be maintained to the MAXIMUM extent possible, at the genetic, population, species, and ecosystem levels. And, **salmon escapement goals, whether sustainable escapement goals, biological escapement goals, optimal escapement goals, or in-river run goals, should be established in a manner consistent with sustained yield; unless otherwise directed, the department <u>will manage Alaska's salmon fisheries, to the extent possible, for the maximum sustained yield</u>** (attach 1, tab 3). We do not believe "corking" provides the best chance for Chinook salmon to recover. Again, this is contrary to ADF&G's policy that "**when it is necessary to restrict fisheries on salmon stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to each fishery's respective use, consistent with state and federal law (tab 3).**

We respectfully request boundary markers be placed at the Ayakulik River to create a 500 yard setback, abolish or adjust "corking" guidelines, and manage the sockeye salmon SEG to higher goal limits to create a better future for Chinook salmon stocks. ADF&G's definition of closed waters, 5 AAC 39.290 states: (a) commercial fishing for salmon is prohibited at all times in the water of Alaska that are (1) within the fresh water of streams and rivers of this state; (2) within 500 yards of the fresh water of a stream that is a salmon stream; (3) over the beds or channels of fresh water of streams and rivers of this state. But for some obscured reasoning, Kodiak ADF&G decided to remove the Ayakulik River markers to allow "corking" whenever the inner Ayakulik Section 256-15 is opened to fishing. There is no study to prove that "corking" the Sockeye run to alleviate an over escapement actually helps the escapement of the Chinook run. Prior to 2007 removal of the markers the Chinook run was good. Just look at the pictures of the seiners blocking the mouth of the river and tell me how many Chinooks can make it through the gauntlet of nets. Bring back the boundary markers and give the Chinook a chance to survive. We want the same definition of (2) above rather than 5 AAC 18.350. Closed Waters (Kodiak Area) (2) Southwest Kodiak District (A) all waters east of the terminus of the Ayakulik River. We understand why you want to keep the tool of "corking" in your arsenal, but it should be used as a last resort. If you want an emergency order to fish the river opening (corking), then we recommend that

spreading the "corking" event over a longer period with every other day closures. This will allow for a significant Chinook salmon escapement. As you can see from the pictures of the 32 seiners, "corking" the Ayakulik River, there is no escapement route for discarded Chinook salmon that may be thrown overboard. Seriously, how can anyone justify an emergency opening to "cork" the river mouth of any river when the upper escapement goals of Sockeye salmon have not been reached? Especially since the Chinook salmon stock is in decline and/or near a concern.

We respect and appreciate ADF&G and their staff. The Kodiak staff has been very helpful and courteous. We are concerned for any declining species and believe Alaska solutions are always better than the Feds. We wish all a Happy and Prosperous New Year!!

Best regards,

Amy Fredette, President, Ayakulik Adventures, LLC
3901 Harry Nielsen Ave., Kodiak, Alaska 99615 (ayakulikadventures@yahoo.com)

Tom Simkowski, President, Ayakulik River Lodge, LLC
P.O. Box 8974, Kodiak, Alaska 99615

Tom Walters, Commander, USCG, RET.; Kodiak City Councilman, RET.

Attachments: Tab 1, Ayakulik River Picture of "Corking"
Tab 2, C-5 GOA Chinook salmon bycatch; Dec 12, 2010
Tab 3, 5 AAC 39.222. Policy for the management of sustainable salmon fisheries

December 12, 2010

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.

Tab 2

5 AAC 39.222. Policy for the management of sustainable salmon fisheries

(a) The Board of Fisheries (board) and Department of Fish and Game (department) recognize that

(1) while, in the aggregate, Alaska's salmon fisheries are healthy and sustainable largely because of abundant pristine habitat and the application of sound, precautionary, conservation management practices, there is a need for a comprehensive policy for the regulation and management of sustainable salmon fisheries;

(2) in formulating fishery management plans designed to achieve maximum or optimum salmon production, the board and department must consider factors including environmental change, habitat loss or degradation, data uncertainty, limited funding for research and management programs, existing harvest patterns, and new fisheries or expanding fisheries;

(3) to effectively assure sustained yield and habitat protection for wild salmon stocks, fishery management plans and programs require specific guiding principles and criteria, and the framework for their application contained in this policy.

(b) The goal of the policy under this section is to ensure conservation of salmon and salmon's required marine and aquatic habitats, protection of customary and traditional subsistence uses and other uses, and the sustained economic health of Alaska's fishing communities.

(c) Management of salmon fisheries by the state should be based on the following principles and criteria:

(1) wild salmon stocks and the salmon's habitats should be maintained at levels of resource productivity that assure sustained yields as follows:

(A) salmon spawning, rearing, and migratory habitats should be protected as follows:

(i) salmon habitats should not be perturbed beyond natural boundaries of variation;

(ii) scientific assessments of possible adverse ecological effects of proposed habitat alterations and the impacts of the alterations on salmon populations should be conducted before approval of a proposal;

(iii) adverse environmental impacts on wild salmon stocks and the salmon's habitats should be assessed;

(iv) all essential salmon habitat in marine, estuarine, and freshwater ecosystems and access of salmon to these habitats should be protected; essential habitats include spawning and incubation areas, freshwater rearing areas, estuarine and nearshore rearing areas, offshore rearing areas, and migratory pathways;

(v) salmon habitat in fresh water should be protected on a watershed basis, including appropriate management of riparian zones, water quality, and water quantity;

(B) salmon stocks should be protected within spawning, incubating, rearing, and migratory habitats;

(C) degraded salmon productivity resulting from habitat loss should be assessed, considered, and controlled by *affected user groups, regulatory agencies, and boards when making conservation and allocation decisions;*

(D) effects and interactions of introduced or enhanced salmon stocks on wild salmon stocks should be assessed; wild salmon stocks and fisheries on those stocks should be protected from adverse impacts from artificial propagation and enhancement efforts;

(E) degraded salmon spawning, incubating, rearing, and migratory habitats should be restored to natural levels of productivity where known and desirable;

(F) ongoing monitoring should be conducted to determine the current status of habitat and the effectiveness of restoration activities;

(G) depleted salmon stocks should be allowed to recover or, where appropriate, should be actively restored; diversity should be maintained to the maximum extent possible, at the genetic, population, species, and ecosystem levels;

(2) salmon fisheries shall be managed to allow escapements within ranges necessary to conserve and sustain potential salmon production and maintain normal ecosystem functioning as follows:

(A) salmon spawning escapements should be assessed both temporally and geographically; escapement monitoring programs should be appropriate to the scale, intensity, and importance of each salmon stock's use;

(B) salmon escapement goals, whether sustainable escapement goals, biological escapement goals, optimal escapement goals, or inriver run goals, should be established in a manner consistent with sustained yield; unless otherwise directed, the department will manage Alaska's salmon fisheries, to the extent possible, for maximum sustained yield;

Tab 3

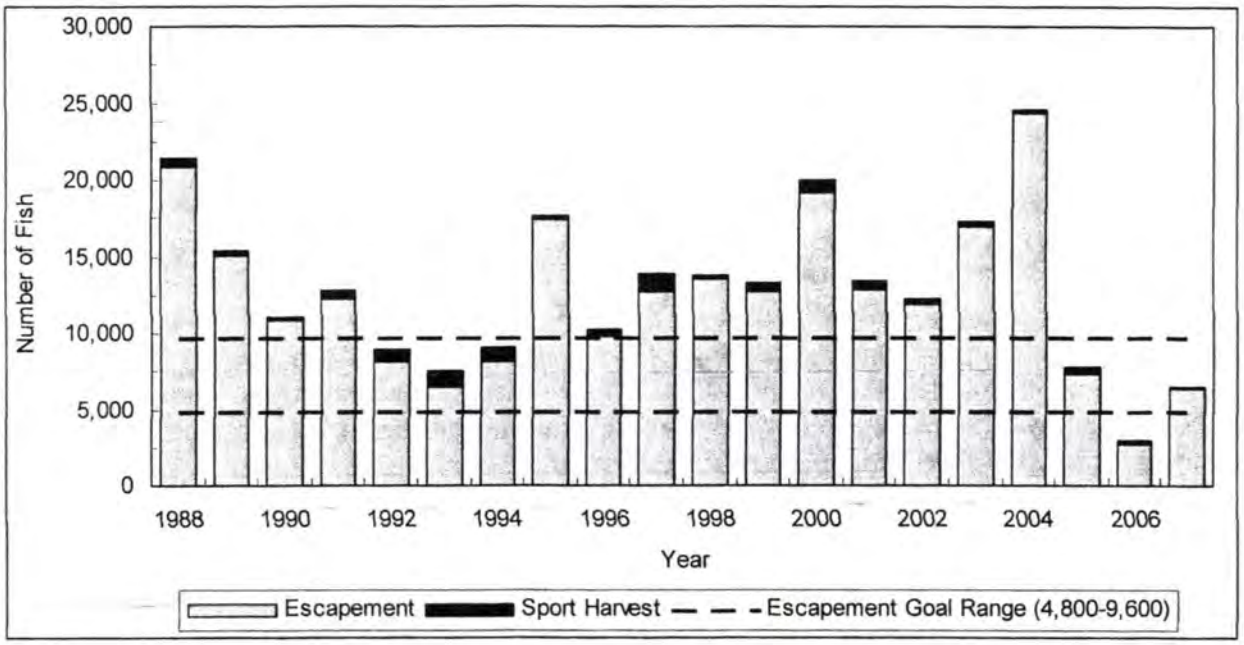

Figure 9.-Ayakulik River king salmon sport harvest and spawning escapement, 1988-2007.

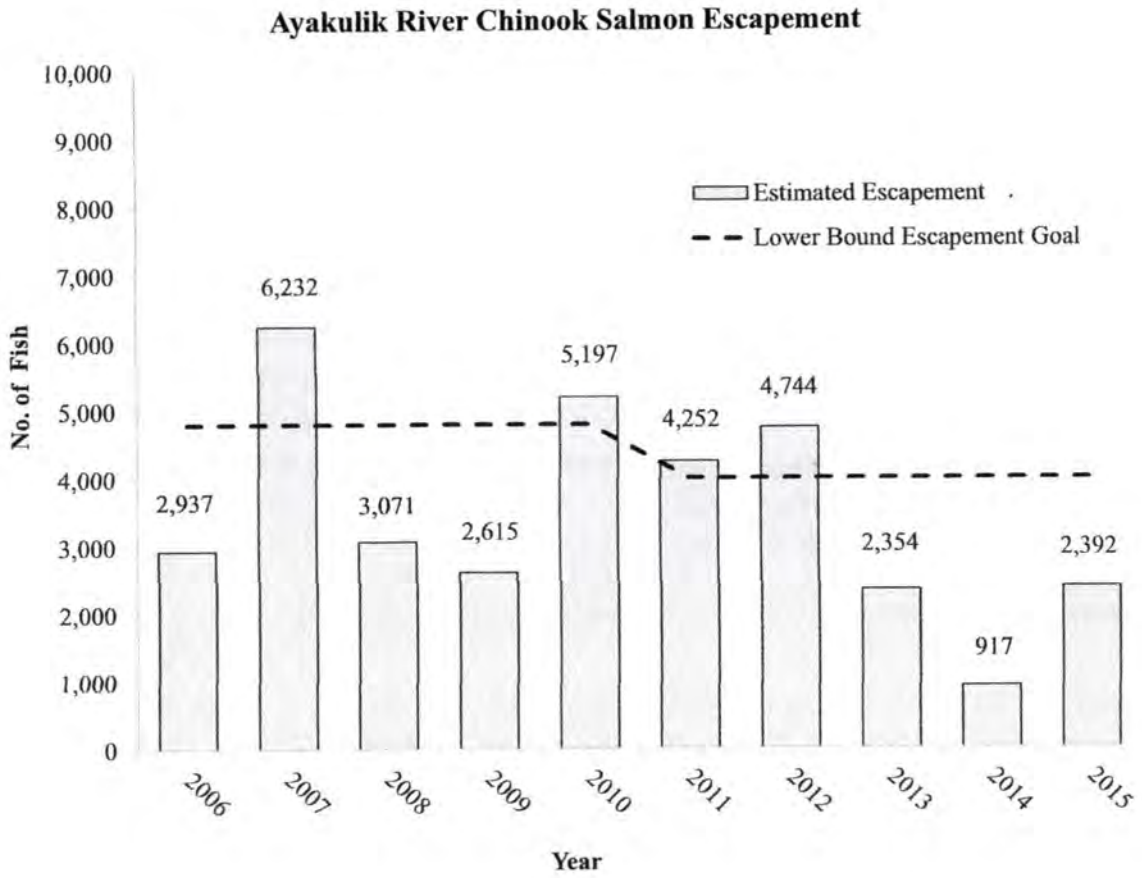

Figure 5.–Estimated escapement of Ayakulik River Chinook salmon, 2006–2015.

Source: Statewide Harvest Survey (SWHS) estimates (Alaska Sport Fishing Survey database [Internet]. 1996–present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish [cited November 2016]. Available from: http://www.adfg.alaska.gov/sf/sportfishingsurvey/); Fuerst 2015; B. Fuerst, Fishery Biologist, ADF&G, Kodiak, unpublished data.