

Mr. Chairman & Members of the Board of Fisheries,

My name is Jim Stubbs & I am the author of the current regulation that ends the LCI Steelhead fishery on 11:59PM on October 31st. This regulation went into effect in 2010. Six years later I am back to oppose Proposal 6 & 7 that recommend liberalizing the length of the season with no supportive data.

The overall strength of the runs returning to LCI streams are said to be in the hundreds to a few thousand. Currently "NO" in season management of steelhead occurs in LCI streams. We lack any biological (BEG) or sustainable (SEG) escapement goals for steelhead, again causing uncertainty on the size, strength, or trends of the runs into LCI streams. ADFG's most current creel survey was taken in 1978 - 1985, over 30 years ago! In 1980 the U.S. Census Bureau found 217,529 people in Southcentral Alaska. The population of Southcentral Alaska in 2016 is 438,816. That is an increase of 221,287, or 102 %. It is reasonable to assume the percentage of steelhead fisherman has followed if not exceeded this trend judging by the number of fisherman I now see on the streams. It is clearly irrational for the steelhead season be liberalized with the uncertainty of the strength of the runs to LCI streams. The Sustainable Fisheries Policy states, "In the face of uncertainty, stocks & fisheries shall be managed conservatively." A precautionary approach should be taken, not liberalizing the length of the season.

OPPOSE PROPOSAL 6 & 7.

In 2009 when I submitted the current regulation to close the Steelhead season on October 31, the average catch for 2007, 2008 & 2009 was 10,907 fish caught & released. This brought about great concern on the number of times fish were being caught & released,

then re-hooked multiple times again. The statistics show that they are certainly being hooked multiple times. The question then became does this also increase the rate of mortality? No information was brought forward by the department. In 2016 we still lack information to answer the question. In the case of uncertainty the Board should take a precautionary approach by opposing Proposals 6 & 7.

In 2013, 2014, and 2015 (August-October) the catch numbers from the Statewide Harvest Survey show an average of 3920 fish caught. This is a drop of 64% from 2007, 2008, and 2009 (August-December) averages. I believe two things have happened in the past 6 years. I believe the November catch was larger than the Department had estimated. September & October are very busy months on the LCI Steelhead streams. The very last weekend in October of 2016 saw parking lots full at the Anchor River, Deep Creek, and the pullouts at Ninilchik River. If the season was lengthened this pressure would carry into November. These fisheries are currently fully allocated!

Second, the strength of the Steelhead runs into LCI streams is down. I fish 25 - 35 days a year for Steelhead on LCI streams. I keep detailed yearly fishing journals recording water and air temperatures, water clarity & levels, sex & length of each Steelhead caught as well as the stream I am fishing, the daily tide, and time of the high tide. Catch numbers from 2013, 2014, and 2015 when compared to 2007, 2008, and 2009 show the same decrease in catch as the Statewide Harvest Survey for the number of fish caught. The decline was 64% and my catch was down 59% during the same time period. These two mirror the decline in strength of the Steelhead runs into LCI streams. Again, uncertainty in run strength should kick in precautionary measures by opposing Proposals 6 & 7.

Until we have the answers as to the current run strength and multiple hooking mortality information, it is unreasonable to liberalize the Steelhead season.

The effects of water temperatures on LCI Steelhead is another important fact to consider when considering Proposals 6 & 7. The graphs at the end of this RC show the water temperatures recorded daily by Cook Inletkeeper. The water temperature in which Steelhead become very slow and lethargic is roughly 34 degrees, at which point they move into a winter survival stage stacking up in large numbers in deep runs & holes in the streams that are very accessible by fisherman. This greatly increases their chances of being foul hooked, then pulled onto the bank ice increasing mortality over normal conditions. Mid to late October & the months of November & December are the prime time for this to occur. Liberalizing the season into November would put the Steelhead of LCI at a higher risk of mortality as they strive to endure the long winter, then use all their energy to spawn in May. Those that survive will return to the sea & hopefully then return to LCI streams 15 - 16 months later.

In the face of so many uncertainties a precautionary approach must be taken. We must be good stewards of our resources & protect them for the generations to follow. Any management increase in bag limit, season, or geographical area should ALWAYS be supported by sound, complete, comprehensive data. We should strive to insure the health of the resource is such that our children and their children have the same or even better opportunities to enjoy this great resource.

Proposals 6 & 7 should be opposed.

Strength of Steelhead runs into LCI streams is down

- No in season management
- No BEG or SEG
- No current creel survey
- Last creel surveys in 1978 - 1985

The opportunity to fish for LCI Steelhead is all of August, September & October

- Good weather
- Good water temperatures
- During the peak of the run
- More time in November offers little benefit for an unknown risk
- No shortage of opportunity to fish

Low water temperatures in a November fishery would increase mortality

- Steelhead become very lethargic at 34 degrees F & below
- Happens each year from mid-October to early November
- More susceptible to hook mortality

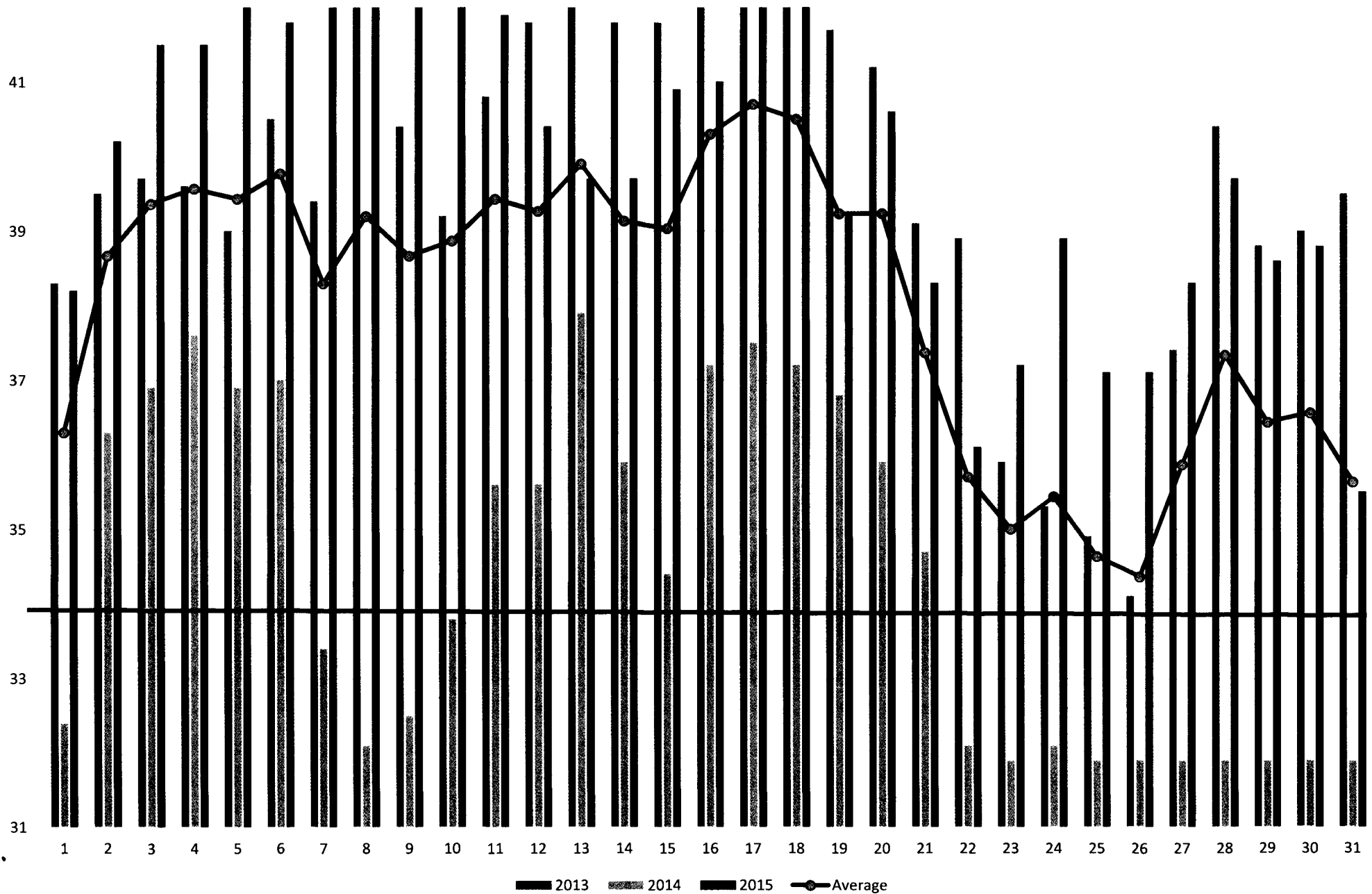
Mortality of fish being hooked multiple times is unknown

- No current information provided by the Department
- No information at BOF meeting in 2010
- No information at BOF meeting in 2016
- Barbless hooks not required

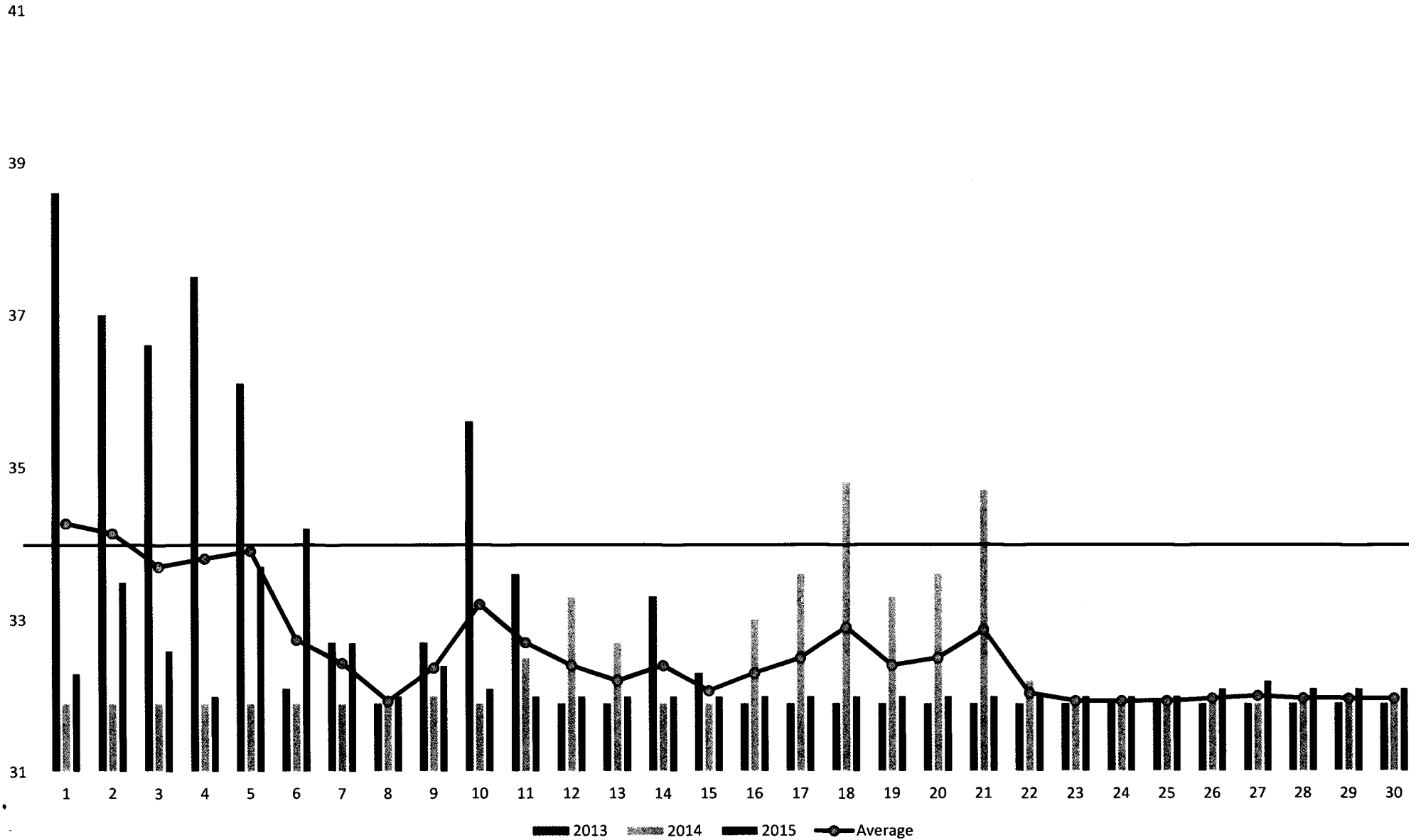
LCI Steelhead streams fully utilized

- Heavily used in September & October
- No surveys have been done by the Department to assess current usage by Steelhead fisherpersons

October



November



October

2013 2014 2015 Average

38.3	32.40	38.2	36.3
39.5	36.30	40.2	38.66667
39.7	36.90	41.5	39.36667
39.6	37.60	41.5	39.56667
39	36.90	42.4	39.43333
40.5	37.00	41.8	39.76667
39.4	33.40	42.1	38.3
42.9	32.10	42.6	39.2
40.4	32.50	43.1	38.66667
39.2	33.80	43.6	38.86667
40.8	35.60	41.9	39.43333
41.8	35.60	40.4	39.26667
42.1	37.90	39.7	39.9
41.8	35.90	39.7	39.13333
41.8	34.40	40.9	39.03333
42.7	37.20	41	40.3
42.5	37.50	42.1	40.7
42.2	37.20	42.1	40.5
41.7	36.80	39.2	39.23333
41.2	35.90	40.6	39.23333
39.1	34.70	38.3	37.36667
38.9	32.10	36.1	35.7
35.9	31.90	37.2	35
35.3	32.10	38.9	35.43333
34.9	31.90	37.1	34.63333
34.1	31.90	37.1	34.36667
37.4	31.90	38.3	35.86667
40.4	31.90	39.7	37.33333
38.8	31.90	38.6	36.43333
39	31.90	38.8	36.56667
39.5	31.90	35.5	35.63333

November

2013	2014	2015	Average
38.6	31.9	32.3	34.26666667
37	31.9	33.5	34.13333333
36.6	31.9	32.6	33.7
37.5	31.9	32	33.8
36.1	31.9	33.7	33.9
32.1	31.9	34.2	32.73333333
32.7	31.9	32.7	32.43333333
31.9	31.9	32	31.93333333
32.7	32	32.4	32.36666667
35.6	31.9	32.1	33.2
33.6	32.5	32	32.7
31.9	33.3	32	32.4
31.9	32.7	32	32.2
33.3	31.9	32	32.4
32.3	31.9	32	32.06666667
31.9	33	32	32.3
31.9	33.6	32	32.5
31.9	34.8	32	32.9
31.9	33.3	32	32.4
31.9	33.6	32	32.5
31.9	34.7	32	32.86666667
31.9	32.2	32	32.03333333
31.9	31.9	32	31.93333333
31.9	31.9	32	31.93333333
31.9	31.9	32	31.93333333
31.9	31.9	32.1	31.96666667
31.9	31.9	32.2	32
31.9	31.9	32.1	31.96666667
31.9	31.9	32.1	31.96666667
31.9	31.9	32.1	31.96666667