

RC326

January 20, 2018

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Board members,

My name is Zack Worrell. I own and operate the Minter Bay, a drift gillnetter fishing primarily in Areas 15(A) and 15(C). The purpose of this letter is to provide my opinion regarding the application of Chilkat king salmon protection measures described in RC266 options (A) and (B).

Options A and B as outlined in RC266 detail Chilkat king salmon protection measures. These protections are well intentioned and necessary to a degree, but their proposed application may be misdirected. I believe that we can modify RC 266 in order to spread culpability and associated protection measures to other gear groups who's operations result in unintended Chilkat king salmon mortality. I also believe that we can adjust gillnet specific protection measures to ensure Chilkat king salmon protections while still allowing reasonable harvest opportunity for hatchery chum salmon.

The area 15 Gillnet fishery is prosecuted nearer to the Chilkat River mouth than any other commercial fishery. Prior to reaching our fishery, a Chilkat River king salmon will be required to navigate through Southeast's premier troll area, followed by the Point Augusta/Hawk Inlet seine fishery. As we all know, trollers are very effective at catching kings (lets assume a realistic mortality rate for released kings during non-retention periods). The Pt. Augusta and Hawk Inlet seine areas are well known king salmon hotspots. Seine nets fish several times deeper than a gillnet, allowing for effective although unintended king salmon harvest in these areas. Non-retention of king salmon in the seine fishery as proposed under RC266 is well intentioned, but would not work for reasons obvious to any person who has witnessed a seiner putting a volume of fish aboard.

The basics of other fishery (seine and troll) impacts can be generalized as follows:

1. The seine and troll fleets **DO** encounter Chilkat River king salmon before they reach the Area 15 gillnet fleet
2. The seine and troll fleets **ARE** more effective at harvesting king salmon than the Area 15 gillnet fleet

3. The adoption of king salmon non-retention regulations imposed on the troll fleet would likely be **SOMEWHAT** effective.
4. The adoption of non-retention regulations imposed on the seine fleet would likely be **MINIMALLY** effective

Under RC266, the Area 15 gillnet fleet is severely restricted, while the other gear groups as described above are permitted to conduct business as usual, so long as they do not retain king salmon. No amount or type of restrictions placed on the area 15 gillnet fleet will aid in the conservation of Chilkat king salmon that were stopped by seine nets and troll gear prior to reaching area 15.

My thoughts regarding the gillnet specific measures as detailed in RC 266 options A and B:

It is my understanding that the majority of the Chilkat king salmon escapement is beyond the gillnet fishery by early June. RC 266 is prescribing prohibitive measures such as night closures, area closures, reduced time openers, and mesh restrictions. Under RC 266, some combination of these measures would be effective through the 5th week of the season (the 3rd week in July usually).

I am completely supportive of these measures, but only if they are 1: Being used to manage an area that is known or suspected to be a migration route for Chilkat River king salmon, and 2: Being used during the period when Chilkat River king salmon are known or suspected to be migrating through the district.

A biologist would be much more qualified to speak to the points of run timing and migration routes, but I will share the culmination of my own experience and observation over 5 years.

King salmon are very rarely harvested on the western half of Area 15(c). I have personally caught 1 mature king salmon over a 5 year period along the western shore of Area 15(c) (Boat Harbor THA), and have received consensus on this topic among other fisherman. Given the low likelihood of Chilkat King Salmon migrating through the western half of Area 15(c) coupled with the high concentration of Boat Harbor THA chums, it seems logical that gear and time restrictions on this area would be minimal due to the low risk of king salmon harvest.

Through discussion with the Haines area biologist, I learned that the majority of the Chilkat River King salmon have migrated beyond the Area 15 gillnet fishery by early June. One telltale indicator of historic run timing is the sport fishing harvest and annual spring salmon derby in Haines. This sport fishery targets Chilkat king salmon exclusively and is carried out beyond the Area 15 gillnet fishery, predominantly near the mouth of the Chilkat River. ADF&G staff have monitored and sampled the Chilkat king salmon sport catch in previous years, and know that

the majority of the kings are beyond The Area 15 gillnet fishery before the commercial season opens on the 3rd Sunday in June. Again, I am supportive of fishing time, gear, area restrictions to protect threatened king salmon stocks. With that said, I do not agree with RC 266's proposal of restrict the gillnet fleet through the 5th week of the season (3rd week in July) in order to protect Chilkat King salmon that escaped through the area in Early June. I agree a run timing safety factor should be applied, but RC 266's proposed 5th week of the season seems excessive beyond reason. The application of severe restrictions through week 5 would disallow the Area 15 gillnet fleet to harvest hatchery produced chum salmon.

I rely on the health of natural salmon runs for my livelihood. Several times over the last 5 years, I have supported and encouraged the ADF&G Haines area biologist to conservatively manage Lynn Canal Sockeye and King salmon fisheries. I am known as a conservationist, and have been referred to as an environmentalist or even a "greenie".

With that said, I believe that the protection measures in RC 266 are too broad in scope pertaining to gillnet measures, and effectively place the entire responsibility of king salmon protection on the Area 15 gillnet fleet. RC 266 should be modified to ensure that the other gear groups share culpability and associated restrictive and protective measures. Area 15 gillnet specific protection measures are certainly necessary but should only be imposed during the known period of Chilkat King salmon migration, and in areas where Chilkat king salmon are known to migrate.

Thanks for your consideration,

Zack Worrell

155 Cordova Street

Juneau, AK 99801