

RC30

AK Board of Fish
Boards Support
PO Box 115526
Juneau, AK 99811-5526

Oct 13, 2017

UCIDA ACR & Genetic Stock Composition of Red Salmon in Area K

Opposed

Chairman John Jensen,

On October 13th, the Kodiak Advisory Committee held a special meeting to discuss the UCIDA ACR 11. The committee and Kodiak ADF&G staff unanimously agreed ACR 11 does not meet the required criteria for acceptance.

1. The ACR DOES NOT- Address a conservation concern.
2. The ACR DOES NOT- Correct an error in regulation.
3. The ACR DOES NOT- Correct an unforeseen effect on the fishery.

Criteria 1: Conservation

There is no conservation concern. Current management practices are meeting escapement goals. Genetic testing may have merit to improve management however the cited genetic test within this ACR was not designed to capture information necessary to adequately improve management practices.

Use of the data from the genetic study to support this ACR has been incorrectly applied. The study does not reflect the entire Kodiak Area and did not occur over a long enough time period to provide accurate base line data. It is silent on all other species caught with sockeye being the smallest percentage of catch. Consequently, the information used for this ACR does not accurately represent the entire fishery.

Without conservation concern this ACR becomes an allocative request (clearly stated by the proposer). Allocative Area K Kodiak Salmon issues should not be addressed prior to or apart from the previously adopted, established and published Alaska Board of Fisheries meeting cycle 2019/2020 Kodiak Area all Finfish. Furthermore, there are NO new compelling elements or issues that would warrant or justify consideration prior to the established cycle. This proposal would also require a complete redesign of Kodiak's management program without addressing biological or management concerns of ADF&G staff. Additionally, economic loss to Kodiak and the State of Alaska will greatly exceed the Cook Inlet Fishery's potential gain.

Criteria 2: Error in Regulation

There is no error in regulation. If escapement goals are being met, as testified by ADF&G staff, there is no "stock of concern" to necessitate a "burden of conservation" as stated by the proposer.

Criteria 3: Unforeseen Effect on the Fishery

There is no unforeseen effect on the fishery. The harvest taken by Area K has not effected the escapement goals of Cook Inlet. Since the inception of the Kodiak Management Plan it has been widely known and accepted that districts in the Kodiak Management Area intercept Cook Inlet Sockeye Salmon. There is no policy in place that secures the common fishery resource for a region or area due to its final destination.

Additional Information: Historical Board Actions

The proposers state the NW Shelikof Management plan (1989) was taken out of cycle. We have a current member that was present during that process and was Kodiaks AC representative who states this information is inaccurate. There is no precedent set for taking this proposal up prior to the normal cycle and we urge the Board to refrain from addressing an allocative ACR that is reactionary. The criteria for ACR's are in place for the purpose of preventing this exact situation from disrupting the cycle process.

Kodiak Advisory Committee Request:

ACR 11 should be addressed with all other ACR's during Agenda Item #18 of the published Board of Fisheries Agenda that addresses "15) Agenda Change Requests (ACRs), and "a) Action on ACRs 1-18"). That is, all or part of ACR 11 should not be delayed to later in the Board Work Session Agenda, including that portion of the published Work Session Agenda scheduled for "Thursday, October 19, 8:30 a.m. "to address "18) Kodiak Salmon Genetic Research".(<http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2017-2018/ws/agenda.pdf>) The Kodiak AC believes that a delay of this nature sets a precedent allowing debate and discussion on the merits of an allocative proposal.

Therefore, we respectfully request the Alaska Board of Fisheries reject ACR 11 at the October 17-19, 2017 Work Session. Thank you for your work on these very important matters and the opportunity to provide community-wide feedback.

Sincerely,

Kodiak Advisory Committee

Paul A. Chervenak, Chairman