



Northwest Setnetters Association
P.O. Box 870
Kodiak, AK 99615

January 11, 2020

Alaska Board of Fisheries
Reed Morisky, Chair

RE: Opposition to proposals 63, 64, 65, 37, and 66

Dear Chairman Morisky and members of the Board of Fisheries,

Thank you for the opportunity to comment on Proposals 63, 64, 65, 37, and 66. We would like to provide you with some figures and brief information about the Kodiak salmon fishery that you might find useful.

Figure 1. Pink salmon streams in the Kodiak Management Area

Figure 2. Kodiak salmon fishery in the geospatial strata of the genetic Mixed Stock Analysis

Figure 3. Similar to Figure 2, but highlights the role of Susitna bound sockeye in the Kodiak salmon harvest.

Figure 4. Shelikof Strait Closed Waters

Figure 5. (Sometimes) Closed Waters of Upper Cook Inlet

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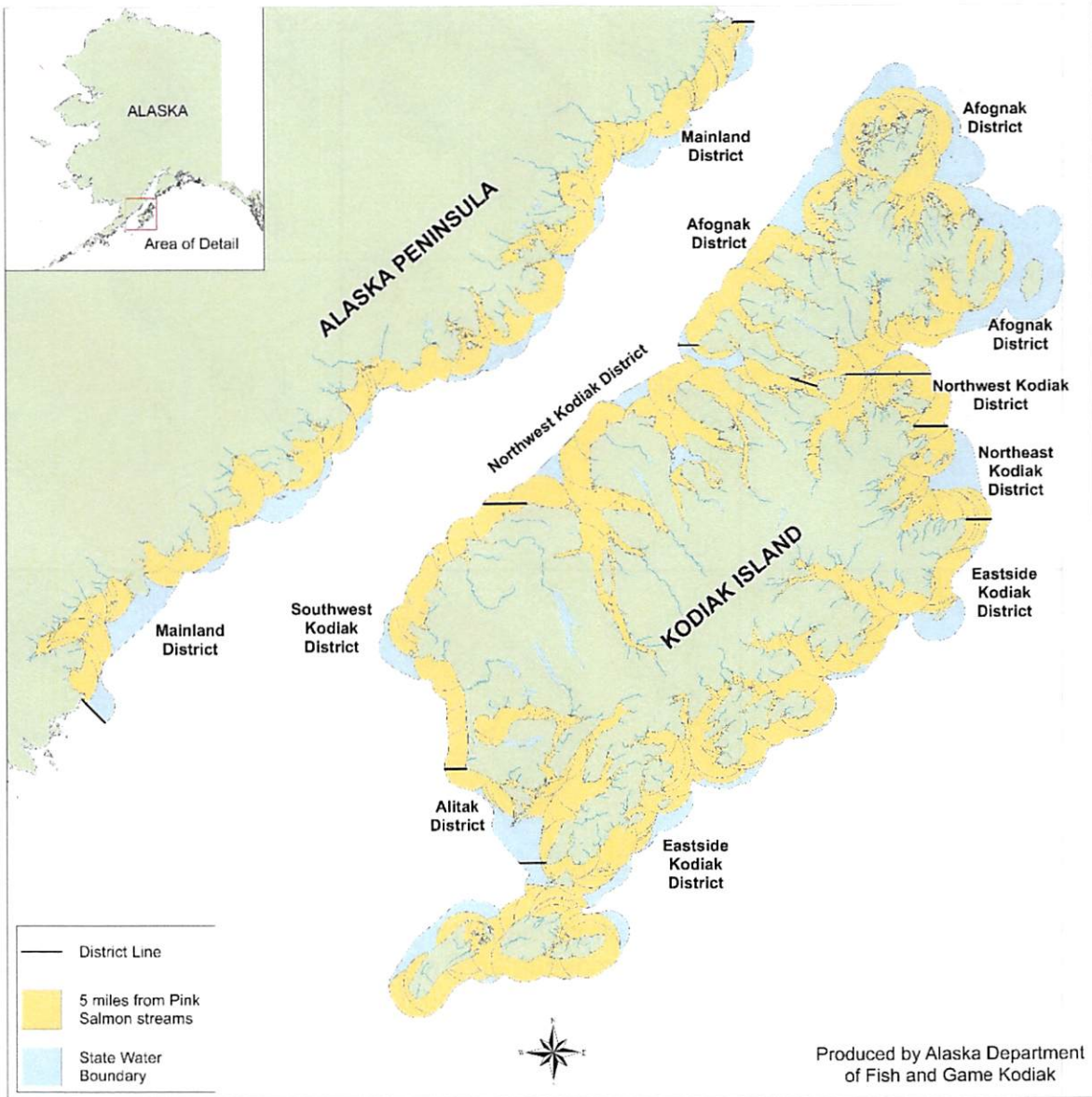


Figure 1. This is a map produced by ADF&G of the Kodiak Island Waters. The yellow circles indicate the 5 mile radii around pink salmon producing systems. Virtually all waters open to salmon fishing in the KMA (blue) are in close proximity to local pink salmon streams. Except for Igvak, the Kodiak salmon fishery is managed exclusively on the abundance of local salmon resources.

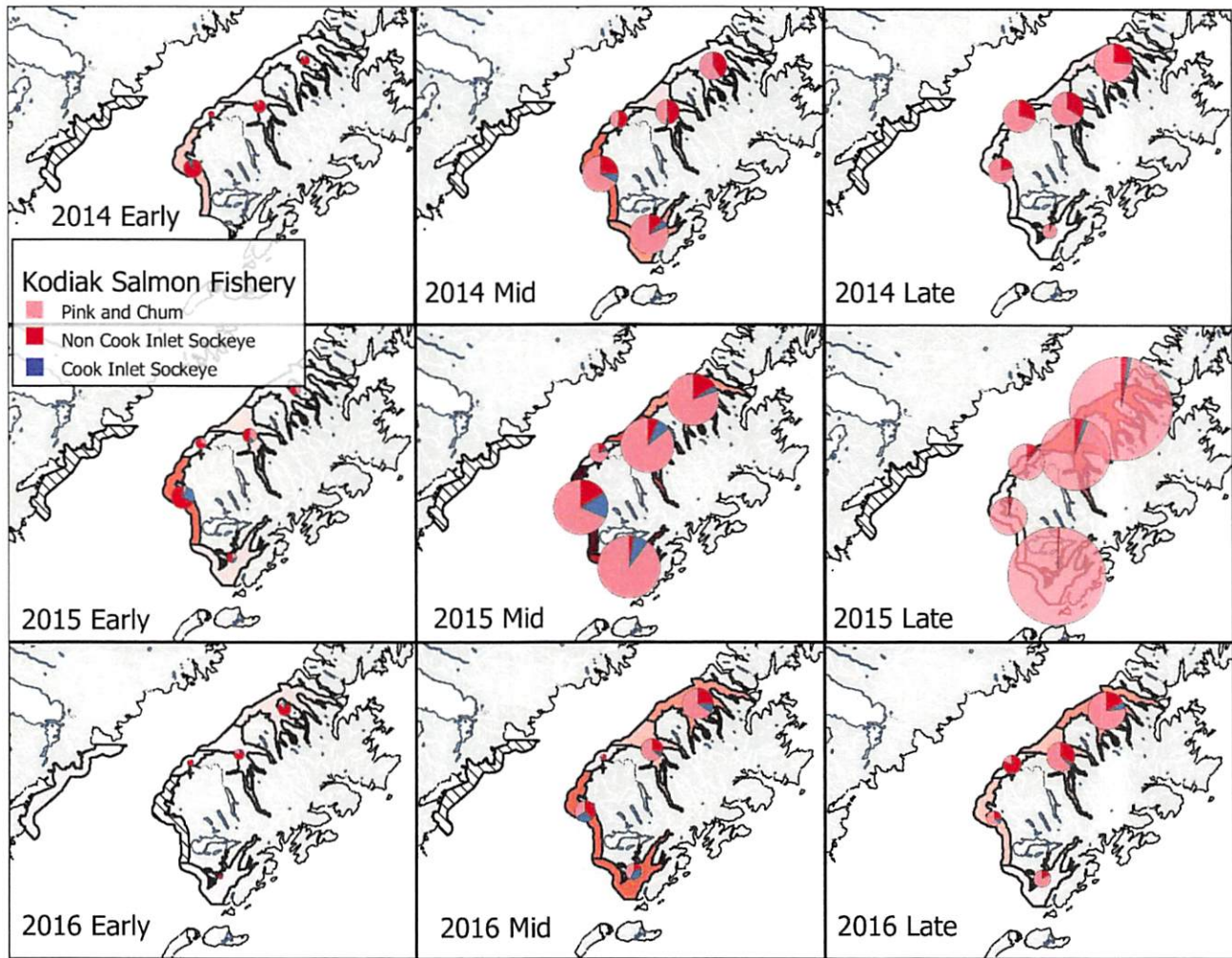


Figure 2. This is a recreation of Figure 25 from the 2016 genetic Mixed Stock Analysis. Using the same spatial and temporal strata, the makeup and magnitude of the Kodiak salmon fishery is displayed in the pie charts. The tremendous interannual variation in the magnitude, composition and timing of the Kodiak salmon fishery can clearly be seen. It is also clear that incidental harvest of Cook Inlet bound sockeye is a small fraction of the local fisheries. Significant reduction or elimination of the harvest of Cook Inlet sockeye would cause a collapse of local fisheries.

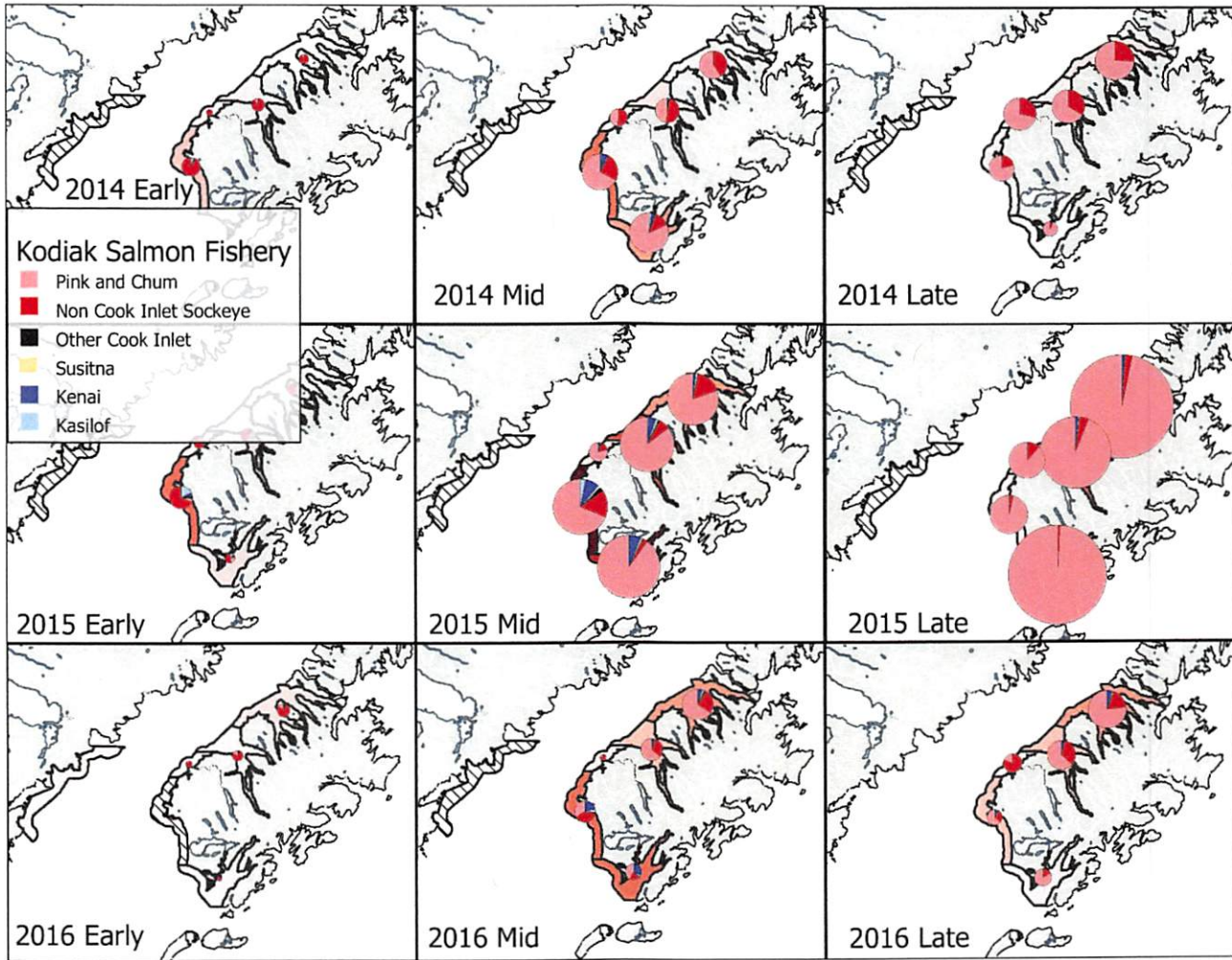


Figure 3. This image is very similar to Figure 2. In Figure 3, the breakdown of the four Cook Inlet sockeye stocks is shown. Of note is that harvest of Susitna bound sockeye are highlighted in yellow. These slivers are so insignificant they can barely be identified in the charts. Even though estimates of incidental harvest of Susitna bound sockeye may appear large and concerning, in the context of the whole Kodiak fishery, there is no realistic way to curtail harvest of only Susitna sockeye.

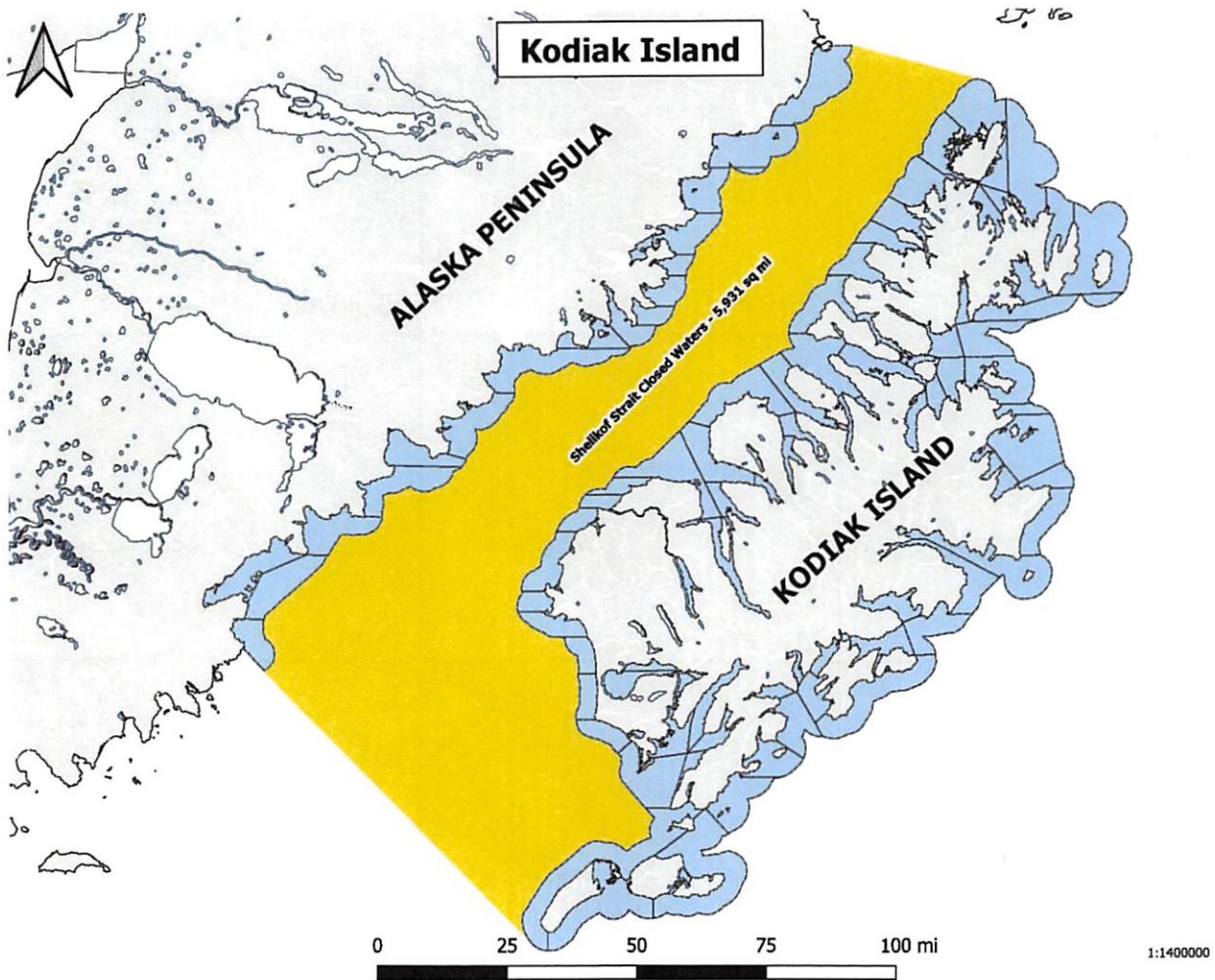


Figure 4. This map shows the Shelikof Strait Closed Waters in yellow. This area, at over 5,900 square miles, was closed to salmon fishing in 1989 at the request of UCIDA and has been permanently closed ever since.

The North Shelikof Strait Salmon Management Plan additionally restricts open waters to fishing within ½ mile of a baseline in the Mainland and Afognak Districts when certain harvest triggers are reached in July.

Both areas of closed waters are in place specifically to prevent harvest of Cook Inlet bound sockeye. Kodiak's incidental harvest of Cook Inlet bound sockeye is not new information in the 2016 genetic Mixed Stock Analysis. In fact, traditional knowledge indicates that the nature of the Kodiak salmon fishery has been known since virtually its inception over 100 years ago. And there have been 6 previous Mixed Stock Analyses done in the 1980's and 1990's which all yielded similar results to the 2016 genetic Mixed Stock Analysis. The results of the previous Mixed Stock Analyses helped to create and evolve the 10 current management plans in the Kodiak Management Area.

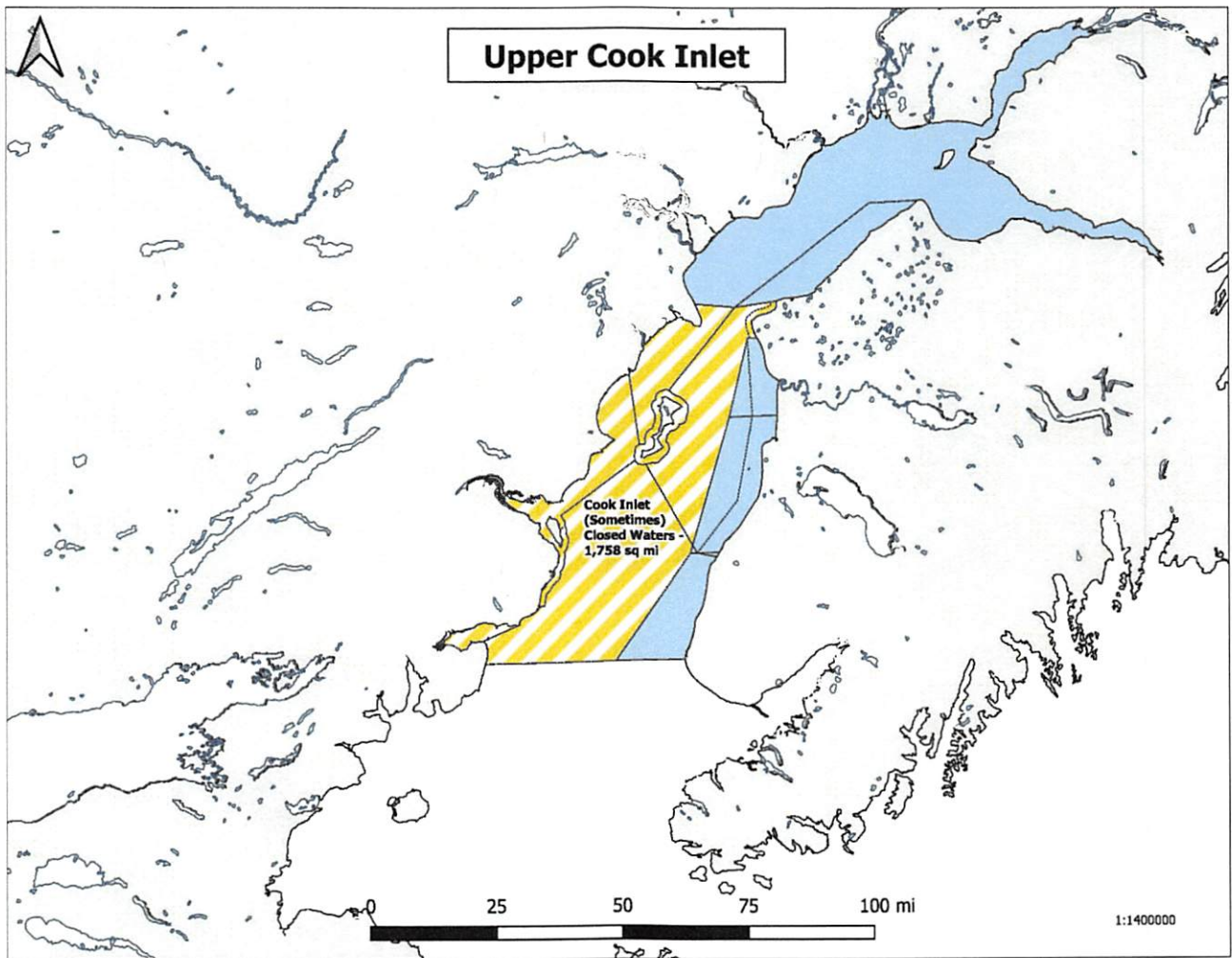


Figure 5. This map shows the (sometimes) Closed Waters of Upper Cook Inlet. This map is drawn at the same scale as the map of Kodiak in Figure 4. Cook Inlet's (sometimes) closed waters are approximately 30% of the Shelikof Strait Closed Waters (1,800 sq. mi. vs 5,900 sq. mi.) These waters are more akin to the seaward zones in the North Shelikof Strait Sockeye Salmon Management Plan in that they are often open to fishing until triggers cause them to close in order to pass more fish northward to the Northern District.

Reflecting on the magnitude of closed waters in the Kodiak and Upper Cook Inlet Management Areas, it seems clear that Kodiak is already carrying its Burden of Conservation.