

Proposal 17

We completely disagree with this proposal. Fishing pressure is relative. You can't compare the Naknek to a remote wilderness river because it flows through the largest hub and city in the area. The destination is easy to access and because of how outstanding fishing is, the river has become an increasingly popular destination. The popularity of the river is directly related to how exceptional the fishing IS and how its only gotten better over the years. People wouldn't be flying in from around the world to King Salmon as a destination fishery if the fishing wasn't world class.

Most lodges on this river have clients that pay for a package that includes flyouts and they are wanting to see as much of Alaska and the surrounding area as possible in their week, so they try to fish as many destinations as they can. When the weather is bad and planes can't get in the air, that's when we see a large spike in the number of anglers on the water. Limiting the number of anglers on the Naknek will potentially push lodges and pilots to try to fly in subpar weather that they might not otherwise risk. This could inadvertently increase fishing pressure on surrounding river systems ie (Kvichak, Brooks, Moraine, Alagnak along with many others) which could cause future "over pressure" issues.

Limiting the number of anglers on the Naknek would have a plethora of unforeseen negative effects and these are just a couple examples of future unintended consequences.

Proposal 19

We completely disagree with this proposal. Egg imitation has been used across North America for decades. Over the last 15-30 years people have progressively moved to beads from more traditional egg patterns. Why you might ask? Well there is several reasons for this, one of which is the REDUCED mortality from catch and release fishing with beads. Alaska state law says the bead can not be pegged more than 2" from the hook. The most common practice is pegging the bead 1.5 to 2" above the hook. With that practice nearly 100% of the fish are hooked in the corner of the jaw making without a doubt the lowest impact rigging you could fish. The larger hooks used when fishing LURES or large streamers are far more damaging then egg imitations could ever be. If you don't believe me, just ask the Fish and Game biologist sitting next to you in that room.

Proposal 21

We AGREE with moving to 100% catch and release on trout but strongly disagree with the reason WHY. Since I arrived in 2006, I have spent almost everyday fishing or guiding for salmon and trout on the Naknek River from June 8th-Fall. With much of my focus being spent on targeting the famed Naknek rainbow trout using a flyrod and practicing catch and release only. Because of all this extensive time spent on the water-throughout all these years, I can personally account for how phenomenal the trout fishing has become. In my time here, it has only gotten better, and the size and age class of the fish has only improved. There are high densities of younger aged trout along with substantial populations of medium and upper aged class fish. In the last few years, we've since more mid-30" fish than ever before.

**If you want/need firsthand accounts from clients on how their fishing experience has been on the Naknek River and how knowledgeable their guide was in navigating the river, finding spots to fish, and helping them catch a satisfactory number and size class of fish throughout their stay, please let me know.

Proposal 22

We COMPLETELY DISAGREE WITH THIS PROPOSAL. Big Creek is an incredibly long tributary. Its headwaters begin in the Katmai Wilderness which runs adjacent to the headwaters of Brooks Lake, Contact Creek and the King Salmon River. If you're not familiar with this region, you're talking over 30 miles straight-line of a MEANDERING river. Accounting for all the bends, that would have to equate to over one hundred river miles. Sportfishing takes places in the bottom handful of miles from Big Creeks mouth where CATCH AND RELEASE for kings is mandatory, along with not removing the fish and their vitals out of the water. If you have ever driven up Big Creek to sportfish, you would know that you could drive up as far you were comfortable and STILL NOT encounter any spawning gravel. Lower Big Creek is exclusively comprised of grass banks and a mud/sand bottom.

If, however, you have ever FLOWN out to fish BUCKEYE'S (a well-known 15-minute fly out from King Salmon) which is often referred to as "Upper Big Creek"...this is where you could confidently call one of the first areas of true spawning grounds. People fly out to fish this area because trout congregate here due the presence of adequate gravel. Trout are hard to find when gravel isn't present and that is why very few people drive up Big Creek in a jet boat to try and target trout. It's a waste of time. I also haven't heard of any salmon that spawn where gravel isn't present.

If you look at a map, you wouldn't think that Buckeye's is that far up Big Creek but in terms of river miles, it would take hours to reach by boat. This is a trek that no sportfishing guide would make because of the time it would take to reach this area and there is often, especially in July, not enough water in Big Creek to reach it, even if you were to try.

If you've spent any significant amount of time in Big Creek, you would know that the only time there is significant traffic above these first several of miles, where boats could potentially be reaching any sort of spawning gravel...and only if the water is high enough to be passible, is late in the Fall during moose season where boats will drive up and down Big Creek in search of moose.

In the proposal it mentions, "kings have been stressed from commercial nets and run a gauntlet of sportfishing hooks before they even reach Big Creek". Closing Big Creek would increase this so called "gauntlet of sport fishing hooks" and **add pressure** to an already condensed area of river due to the closure of king fishing above the sign at Rapids Camp, Paul's Creek and King Salmon Creek. The ability to

fish Big Creek offers a **relief to boat pressure on the main Naknek River**. In other proposals submitted, like **Proposal 17**, this proposal would mirror the same issue that is being complained about. You could make the same argument for the main river. Why isn't the entire main river closed for Kings below the sign at Rapids Camp all the way down to the mouth of the Naknek? Because there are no spawning grounds for Kings in between the two. There is no spawning gravel in Big Creek where sportfishing is being conducted and shouldn't be closed as such.

I would also like to address where the proposal mentions, "kings are easier to target in smaller water". There is a bottleneaking point in front of King Salmon Creek where Kings will hold and rest before continuing to swim up and past the buoys. You could say that it is a place that congregates Kings making them much easier to target. You will see boats that key in on this area because it is very easy to pattern where the kings will swim through, causing what could be called an unfair advantage to the angler if we are making the same argument about the water in Big Creek making it easier to catch Kings. If we're using the same logic, no one should be allowed to fish anywhere near the mouths of King Salmon Creek, Pauls Creek or Big Creek because it "congregates where Kings swim" making them easier to target.

I would like to note that this part of the proposal is making arbitrary claims based off no scientific facts.

Big Creek is invaluable to the fishery because it is one of the only places that king salmon can be successfully targeted on a flyrod. Which is most of the king salmon fishing pressure in Big Creek.

Our bottom line is wanting to protect these fish and share the experience with clients of being able to catch and safely release them. Here are some possible alternative solutions:

1. Call for ALL Kings 28" and greater to be 100% catch and release only on the main river of the Naknek (Big Creek is already designated as CATCH AND RELEASE ONLY)
2. Absolutely no harvesting of hens anywhere in the main river
3. Make Big Creek fly fishing ONLY
4. Designate Big Creek for single hooks ONLY

This would help ensure that those size and age classes are further protected for the future and help increase returns.

Please read through the direct quotes below citing relevant studies and interviews conducted on the safety and effectiveness on catch and release kings in Alaska.

Study and interview citing's:

Keep in mind this study is done on the Nushagak River where bait is legal and common practice. On the entire Naknek system bait fishing is NOT permitted. **"Fish caught with flies or lures typically survive at a higher rate than fish caught with bait."**

1. Operational Plan: Mortality of Chinook Salmon Caught and Released Using Sport Tackles in the Nushagak River, 2018

"The first year of this project was completed in the summer of 2017. A total of 107 tags were deployed but 1 tag was never seen via telemetry and 1 tag will be removed from the study due to its unknown

date of mortality. Of the 105 uncensored tags, 7 were confirmed mortalities whereas 98 were tracked alive for the full 5-day study period. This preliminary data produces a rate of mortality of 6.7%. “

By Jason E. Dye and Lee K. Borden

**2. Alaska Outdoor Digest: Nushagak Study: Most Kings Survive Catch-and-Release
(All quotes are from Lee Borden, an ADF&G biologist in Dillingham)**

“Biologists on the Nushagak River are in the second year of key research on how well King Salmon survive being caught and released by sport fishermen.”

“The travel and durability of some of the fish in last summer’s study might surprise anglers.”

“August 10 (in 2017) we found a fish tagged six weeks prior, and 100 miles upriver, that was still moving and presumably spawning.”

“The kings handled and released carefully have shown a high probability of surviving to continue spawning.”

“Fish handling techniques have improved dramatically in the past 25 years, too.”

“For example, one fish was bleeding released, yet traveled another 140 miles upriver. More make it than we think.”

“The most important rule for survival is not removing a caught salmon from the water at all.”

“Fish caught with flies or lures typically survive at a higher rate than fish caught with bait.”

“MOST GUIDES I SEE FISHING GENERALLY TREAT THESE FISH REALLY WELL. THEY’RE CONCERNED ABOUT THE RESOURCE. THE ANGLING CULTURE HAS CHANGED IN THE LAST DECADE OR TWO WHERE PEOPLE CARE ABOUT THE FISH, AND CARE ABOUT HOW THEY HANDLE THEM.”

By Lee Leschper

Closing statement

Based on all these scientific findings indicating that the catch and release method is acceptable and effective, the only question I have would be, “why should Paul’s Creek and King Salmon Creek be closed to the extremely safe and effective catch and release method of fishing? By closing these to catch and release sportfishing, you are further crowding and creating a “gauntlet of sportfishing hooks” (as quoted in the proposal) on a small section of the main river.

Proven over the past 100 years with The North American Model of Conservation. The past and the future is dependent on hunters, anglers and biologists working together to create opportunity and advocacy for the species we love while minimizing our negative impact. Because without opportunity you don’t get advocacy, without advocacy you don’t get improvement. You also don’t have people left to fight the present and future fights for the species with things such as Pebble Mine. We should clearly be moving in the opposite direction of this proposal and increase opportunity while decreasing impact.

