

Greetings chair and board of fish

Kyle Lints, smelt fisherman since 2018,

I am opposed to proposition to 217. To repeal the fishery entirely is an unnecessarily drastic measure.

I am neutral on proposition 216. As a fisherman and environmentalist, I am torn by the valid concerns brought forth. My job is to catch fish, your job is to sustain Alaskan fisheries. With this in mind, I present to you my observations.

1. First, economically this fishery is small but quite viable including about 25 seasonal commercial fishing jobs, 15 dock and processing jobs and marketing and management staff. Copper River Seafoods sells smelt in Anchorage for 2.50 per pound. For easy math, 400,000 pounds processed equals \$1 million in economic value, most which stays on the Peninsula.
2. Second. This is a local, multigenerational fishery. At least two often three generations of fisherman are working each fishing operation. To repeal the smelt fishery is to lose a local, small vessel niche fishery, unfortunately a dying breed in the state of Alaska, an endangered species if you will.
3. For my third point, I would like to address section E of the forage fish management plan, which reads as follows; "a vessel fishing in a directed ground fish fishery may retain a maximum allowable bycatch of forage fish equal to no more than 2% of the round weight or round weight equivalent of the ground fish on board the vessel." We're talking trawl bycatch here. The Gulf of Alaska ground fish total allowable catch for 2023 was 476 thousand metric tons, approximately equivalent to 1 Billion pounds of fish in the round. 2% of this is 20 million pounds. This is 50 times greater than the smelt harvest level for Upper Cook Inlet! I will say it again; allowable trawl bycatch is 50 times larger than the entire smelt fishery.

If the upper Cook Inlet smelt fishery is closed... and provision E of the forage fish management plan is not addressed, the board of fish needs to question its conservation values.

4. Eulachon run timing and strength are highly variable as observed in scientific papers and the commercial catch record. However, if we are overharvesting the resource, proposal 216 is an opportunity for the board to implement a fast-down, slow-up management approach. If adopted I encourage the Board to keep an open mind to future appeals. I encourage the board to consider an IN-season abundance based management approach at 200 ton GHL.
5. Lastly, let's conduct a lawful and orderly fishery. Why was the guideline harvest level exceeded two years running? I can tell you but not in three minutes... Let me just say this... 2023 was the first year fish tickets were made at the time of delivery. Historically weights were always taken at the back end of the plant 72 hours after delivery. This is no way to manage a guideline harvest level. Fish tickets and communication are necessary to manage a sustainable fishery. Alaska wildlife trooper's presence and review is encouraged.

Thank you. - Kyle Lints

In closing I would like to thank the board for their work to sustain healthy fish and game populations throughout the great state of Alaska.



Kyle Lints

THE STATE  
of ALASKA  
GOVERNOR BILL WALKER

Personal Testimony

RC051  
Department of Fish and Game

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## MEMORANDUM

TO: Tracy Lingnau, Regional Supervisor  
Division of Commercial Fisheries

DATE: February 9, 2017

FROM: Mark Willette, Area Research Biologist  
Division of Commercial Fisheries

SUBJECT: Smelt (Eulachon)  
Spawning Biomass  
Assessment in the  
Susitna River, 2016

In 2016, the Alaska Department of Fish and Game (department) conducted the first year of an anticipated three-year study to estimate the run timing, age, sex and size composition and biomass of smelt or eulachon (*Thaleichthys pacificus*) spawning in the Susitna River watershed during May and June. Although, anecdotal information indicates eulachon are abundant in the Susitna River watershed, the total biomass of the run has not been estimated. The Alaska Board of Fisheries (board) has authorized a 100 ton annual commercial harvest of eulachon in northern Cook Inlet most of which is taken in the lower Susitna River. Although, the department believes this harvest level is a very small fraction of the total eulachon population, estimates of the actual harvest rate are not available. Due to their high densities and lipid content, eulachon are also an important food source for endangered Cook Inlet beluga whales (*Delphinapterus leucas*) during spring when their energy reserves are low.

The 2016 estimates of abundance and biomass for eulachon spawning in the Susitna River were calculated indirectly from estimates of larval densities and stream discharge data collected from May 12th to July 6th. During this time period, larval eulachon densities were estimated on a weekly basis from net tows conducted downstream of the confluence of the Yentna and Susitna rivers. The larval densities were then integrated with stream discharge measurements to estimate larval production exiting the Susitna watershed. Adult eulachon biomass was then estimated from the total number of larvae, estimated survival from egg to larvae, mean fecundity of female eulachon, mean female body weight, the sex ratio of males to females, and mean male body weight.

Preliminary estimates are available from the first year of the study. Simulation model results indicated the most probable total eulachon biomass in 2016 was 48,000 tonnes (95% CI: 29,000–127,000 tonnes). Based on this, the current commercial harvest level of 100 tons (90.7 tonnes) equates to harvest rate of approximately 0.2% (95% CI: 0.1%–0.3%).

This study will be repeated in 2017 and 2018 if the department is successful obtaining external funding from the National Fish and Wildlife Foundation (2017) and National Marine Fisheries Service (2018).

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Alaska Admin Code

5 AAC 39.210

(ii) The department may require onboard observers as specified in 5 AAC 39.141 and 5 AAC 39.645 on fishing vessels, catcher-processors, and floating processors that participate in high impact emerging commercial fisheries.

### **5 AAC 39.212. Forage Fish Management Plan.**

(a) This management plan governs the commercial harvesting of forage fish species in the waters of Alaska.

(b) The board finds that forage fish perform a critical role in the complex marine ecosystem by providing the transfer of energy from the primary and secondary producers to higher trophic levels. The higher trophic levels include many commercially important fish and shellfish species. Forage fish also serve as important prey species for marine mammals and seabirds.

(c) The board finds that abundant populations of forage fish are necessary to sustain healthy populations of commercially important species of salmon, groundfish, halibut, and shellfish.

(d) Except as otherwise provided in 5 AAC 03 - 5 AAC 39, forage fish may not be commercially taken.

(e) A vessel fishing in a directed groundfish fishery may retain a maximum allowable bycatch of forage fish equal to no more than two percent of the round weight or round weight equivalent of the groundfish on board the vessel.

(f) For the purposes of this section, "forage fish" means the following species of fish:

- (1) Family Osmeridae (capelin, eulachon, and other smelts);
- (2) Family Myctophidae (lanternfishes);
- (3) Family Bathylagidae (deep-sea smelt);
- (4) Family Ammodtidea (Pacific sand lance);
- (5) Family Trichodontidae (Pacific sandfish);
- (6) Family Pholidae (gunnels);
- (7) Family Stichaeidae (pricklebacks, warbonnets, eelblennys, cockscombs, and shannys);
- (8) Family Gonostomatidae (bristlemouths, lightfishes, and anglemouths);
- (9) species of the Order Euphausiacea (krill).

**5 AAC 39.645 ("Shellfish Onboard Observer Program") took effect 7/12/86.**

## Article 2 Salmon Fishery

### **5 AAC 39.220. Policy for the management of mixed stock salmon fisheries.**

(a) In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority. Allocation of salmon resources under this policy will be consistent with the subsistence preference in AS 16.05.258, and the allocation criteria set out in 5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007.

(b) In the absence of a regulatory management plan that otherwise allocates or restricts harvest, and when it is necessary to restrict

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5 AAC 21 article4

## Article 5 Smelt Fishery

### 5 AAC 21.505. Cook Inlet Smelt Fishery Management Plan.

(a) Smelt may be taken only under the conditions of a commissioner's permit issued under this section.

(b) Smelt may be taken only

(1) from May 1 through June 30; *Replace w/ Tidal*

(2) in the marine waters of Cook Inlet in that portion of the General Subdistrict northeast of the Chuit River and southwest of the Little Susitna River; and

(3) with a dip net.

(c) No more than 200 tons of smelt may be taken annually under this section.

### 5 AAC 21.510. Fishing seasons.

Repealed.

### 5 AAC 21.531. Gillnet specifications and operation.

Repealed.

### 5 AAC 21.534. Identification of gear.

Repealed.

### 5 AAC 21.535. Minimum distance between units of gear.

Repealed.

### 5 AAC 21.550. Closed waters.

Repealed.

## Article 6 Herring Fishery

Repealed 4/8/79

## Article 7 Shellfish Fishery

### 5 AAC 21.705. Application of regulations to adjacent high seas area.

Repealed 6/15/74.

### 5 AAC 21.710. Fishing seasons.

Repealed 10/12/74.

### 5 AAC 21.730. Gear.

Repealed 10/12/74.

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