



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Kenai Fish & Wildlife Conservation Office
 43655 Kalifornsky Beach Road
 Soldotna, AK 99669-8296



IN REPLY REFER TO
 FWS/AFES

March 2, 2017

Mr. John Jensen, Chair
 Alaska Board of Fisheries
 Alaska Department of Fish and Game
 P.O. Box 115526
 Juneau, Alaska 99211-5526

Dear Mr. Jensen:

Please consider the following points relating to Alaska Department of Fish and Game (Department) Staff Comments for proposals number 155 and 159 that were submitted by the U. S. Fish and Wildlife Service to conserve Kenai River Chinook Salmon.

1. For both proposals 155 and 159, Department Staff Comments state: *"Since mainstem spawning king salmon did not show site fidelity to spawning areas until after the sport fishery closed on July 31, proposed regulations to conserve mainstem spawning king salmon by closing areas to king salmon fishing during July cannot be evaluated by spawning distribution."* (RC3, pages 33 and 43). This statement is different from information presented in other reports (Reimer 2013; Eskelin and Reimer 2017). For example, information presented in Eskelin and Reimer (2017; page 43) states that *"Mainstem spawners began displaying site fidelity to their eventual spawning area as early as mid to late June although in most cases site fidelity was first displayed in mid-July"*. Eskelin and Reimer (2017; page 43) also state that *"...the median duration of site fidelity for all mainstem spawning fish was 12 days. Spawning is assumed to have occurred toward the end of each fish's site fidelity period, followed by mortality."* Table 1 summarizes information from the Department's recent radio-telemetry reports that indicate some Chinook Salmon have likely spawned and died prior to the regulatory end of the sport fishery on July 31 based on reported dates of "First Site Fidelity", median site fidelity duration (12 days), and reported dates of "First Mortality". These early-arriving mainstem spawners are vulnerable to harvest on their spawning grounds in most years.
2. For both proposals 155 and 159, the Department Staff Comments state: *"Data from 2010-2014 shows that approximately 60% of these mainstem spawning fish are still located downstream of Slikok Creek in early July while about 20% were in closed areas upstream of Slikok Creek and approximately 20% were in areas open to fishing upstream of Slikok Creek (Figure 153-4)."* (RC3, pages 33 and 43). This information is correct for July 1, but the proportions change as the run and fishery progress into July. By July 15, Figure 153-4 (page 28 of RC3) illustrates that about 70% of mainstem spawners radio-tagged prior to July 1 are located between Slikok Creek and Skilak Lake, of which 40% are in unrestricted areas. Up to 45% are in unrestricted areas between RM 19 and RM 50 by July 22 (RC3, page 28, Figure 153-4). Most of these fish arrived in the river and were counted as part of the early-run escapement and would benefit from early-run protections throughout the remainder of their freshwater residence.

Table 1. Summary of information presented in Reimer (2013) and Eskelin and Reimer (2017) regarding site fidelity above the Soldotna Bridge for mainstem spawning Chinook Salmon.

Year	Soldotna Bridge to Moose River		Moose River to Skilak Lake	
	First Site Fidelity	First Mortality	First Site Fidelity	First Mortality
2010 ^a	21-Jun	11-Jul	13-Jul	22-Aug
2011 ^a	14-Jul	1-Aug	1-Aug	24-Aug
2012 ^{a,b}	31-Jul	15-Aug	7-Jul	17-Jul
2013 ^{a,b}	28-Jun	17-Jul	9-Jul	28-Jul
2014 ^b	26-Jun	20-Aug	11-Jul	20-Jul

^a Source: Table 16 in Reimer, A. M. 2013. Migratory timing and distribution of Kenai River Chinook salmon 2010-2013. a report to the Alaska Board of Fisheries, 2014. Alaska Department of Fish and Game, Division of Sport Fish, Regional Information Report 2A13-06, Anchorage.

^b Source: Table 19 in Eskelin, A., and A. M. Reimer. 2017. Migratory timing and distribution of Kenai River Chinook salmon using radio telemetry, 2014-2015. Alaska Department of Fish and Game, Fishery Data Series No. 17-03, Anchorage.

3. Department Staff Comments for Proposal 155 (RC3, page 32) state: "*Closing large areas of the river to protect mainstem spawning king salmon would provide marginal benefits according to the biology and behavior of mainstem spawning Kenai River king salmon.*" Proposal 155 affects approximately 10% (RM 45.5 – RM 50) of the areas currently open to Chinook Salmon fishing during May, June, and July unless otherwise restricted through Emergency Orders. Within the proposed closure area, the Department has identified RM 46 as the highest concentration of mainstem spawning Chinook Salmon in the entire Kenai River (Eskelin and Reimer 2017; Figure 10).
4. Department Staff Comments for Proposal 155 (RC3, page 32) state: "*Adopting this regulation would increase regulatory complexity when added to the existing sanctuary areas, boat fishing, and seasonal closures.*" Proposal 155 would not increase regulatory complexity; it would simply extend regulations currently in effect for the Kenai River upstream of Skilak Lake for an additional 4.5 miles below the lake.

Thank you for the opportunity to provide additional information, and I am happy to address any questions from the Board.

Sincerely,



Jeffrey Anderson
Field Supervisor
Kenai Fish and Wildlife Conservation Office