



Adam Barker

Oct 2nd 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: UCIDA Agenda Change Request and  
Genetic Stock Composition of Sockeye Salmon  
in the Kodiak Management Area

As a third generation Alaskan fisherman; I adamantly oppose the UCIDA agenda change request, there is nothing in the Kodiak Management Area that needs correcting by this bureaucratic ramrodding (forcing a measure to be accepted quickly.)

I grew up purse seining Kodiak with my Dad, Mom and two brothers as a family operation. I purchased my own permit, boat, and operation in 2000 and have been participating in the Kodiak Salmon fishery ever since. This year I had the privilege to fish with my son who is 9. My daughter who is 6, cannot wait till she can work out on the boat! I depend on fishing the Kodiak area for salmon as my sole income, and any time or area lost in this fishery would be completely detrimental to my family.

Kodiak is a stormy, tough, long, grind fishery. Not a quick home run fishery like Bristol Bay or PWS, for these reasons our permits are the cheapest seine permit in the State of Alaska.

If we start pointing fingers on who is allotted all the salmon in all the areas leading up to and beyond Kodiak it will only screw everybody participating in any salmon fishery in the surrounding area.

Remember when the Kodiak seiners got seaward zone restrictions in the North Shelikof due to pressure from the Cook Inlet drift fishery? Then the Cook Inlet drift fishery was in turn restricted to corridors by the Cook Inlet Sport Fisherman So see how the chain of greed ruined the prospects of the original protesters, do we have to play this out over and over when we should be uniting to make a better market for everyone? Are we going to have countless treaties with each other? Each place pointing the finger on up the ocean, Chignik, Area M, Bristol Bay? We all know its hard to get the salmon to stay in their little lines they are allotted to.

Science has proven that the Kodiak Management plan WORKS! Kodiak has an abundance of wild runs both on the Island and the Mainland. If we are restricted from traditional fishing areas, over-escapement could be very detrimental to the environment.

Allocating is favoritism, for you to consider this agenda change seem against your values and puts the board's character in question.

The UCIDA agenda change does not meet the Board of Fisheries agenda change request criteria. There is no error in regulation that needed correcting.

Thank you for your time and attention,

Adam Barker, Jessie James, Maxwell & Allie Barker



Submitted By  
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September 28, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

**RE: UCIDA Agenda Change Request and Genetic Stock Composition in the Kodiak Management Area**

Dear Board of Fish members:

I am writing in opposition of the UCIDA agenda change request for several reasons. Most immediately, it does not meet your agenda change request criteria, which state that there must be a conservation concern, an error in regulation, or a need to correct an effect on a fishery that was unforeseen when a regulation was adapted. In addition, if UCIDA's proposal were to be adopted, it would set a difficult and dangerous precedent about mixed stock management statewide, it would severely damage ADF&G's ability to manage all of Kodiak's salmon species for sustainability, and it would impose drastic economic hardship to Kodiak's salmon fishermen.

I am a second-generation Kodiak fisherman. My father started salmon fishing here in 1967, and I have setnetted since I was a toddler with my family, for my whole life. I took over the permit from my dad several years ago, but just in 2016 finally bought the setnet operation from my parents outright. It was a monumental business decision allowing me to quit teaching at the college (where I had benefits and retirement), but one that I made with the historic nature and rhythms of the fishery in mind. Knowing that there are always bound to be cycles of horrible years mixed in with good ones, I determined that, through careful financial management and planning, I could make it work – setnetting in Kodiak could provide for me. As a young fisherman entering the industry, I am in a particularly precarious financial position. If the UCIDA proposal were to go into effect, it would change everything. Having five weeks of severely curtailed fishing time – losing what I had known to be the historic average, what I had planned for when making my business decisions – would be catastrophic.

My opposition to the agenda change request is not only about my circumstances, or me, however. The change request simply doesn't make any sense. I know you consider and deliberate about what precedents you set, and if you allow this agenda change request, I see that it will go against the criteria you have already established to guide your decision making.



A.

Your first listed criteria is conservation concern. What is the new conservation concern here? Kodiak salmon fisheries have proceeded historically in the same manner for decades. There is no new fishery or targeted catch of Cook Inlet bound sockeye, so the conservation concern should not be considered new. There are no new fishing patterns. In terms of sustainability, according to the "Sustainable Salmon Fisheries Policy Checklist" of 2008, there is nothing happening in Kodiak that causes a concern about sustainability. This document does, however, indicate in item 9 that habitat concerns should be considered. I argue that the Kenai peninsula is where habitat degradation is occurring, not Kodiak, particularly not the west side of the island, which is virtually all National Wildlife Refuge land. Kodiak should not bear the conservation burden for the peninsula's habitat destruction.

B. The second criteria, to correct an error in regulation, makes no sense. What is the error in regulation? The Kodiak and Cook Inlet management plans have been developed carefully with input from many stakeholders over the years, and this one genetic study of only 3 years, while perhaps interesting and worthy of discussion during a regular board cycle, does NOT indicate that there has been an error in regulation.

C. The third criteria is to correct an effect on a fishery that was unforeseen when a regulation was adopted. While at first glance, the genetic stock composition study does seem to shed new light on the mixed stock nature of Kodiak's salmon fishery, analysis into historical information and records shows this is not the case. This study clearly does not represent any new information that wasn't present when the Kodiak and Cook Inlet management plans were established, nor is it even enough information to establish any trends. Independent third party reviews of the study indicates that finding mixed stock in KMA is not surprising given the historical information on file. According to the third party report, "Barrett and Swanton (1991) report that sockeye harvests in the North Shelikof Strait in the 1940s, 1970s and 1980s ranged from 30% to 100% Kodiak fish and 0% to 59% Cook Inlet origin fish." This historical information is supported, not contradicted, by the latest science. In addition, as any scientist will tell you, a small-scale 3-year study is not enough to understand a pattern or trend. Kodiak's managers had the information available when developing our current management plans, and there is no reason to believe that this information was unforeseen when the plans were developed.

It is also important to consider the implications of UCIDA's request in a broader sense. Of grave concern is the precedent that this would set regarding mixed stock management, statewide. We have never believed that Kodiak catches only Kodiak fish, due to its location. This was taken into account when developing management plans. What's key here is that Kodiak is not unique. Would you manage Chignik because they stand in the path of some Kodiak-bound fish? How about Area M management? I've heard many argue that fish from False Pass are headed to Kodiak, just to give one example. And I'm sure on the North side of the peninsula, Bristol Bay fishermen assume Area M fishermen can be affecting their returns. Your 1993 finding, "Alaska Board of Fisheries Findings on Policy For Mixed Stock Salmon Fisheries" (93-145-FB), provides guidance. Particularly relevant are the following points:

(2) "...Most mixed stock fisheries are long standing and have been scrutinized many times by past boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation...."

(3) "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fishery."

(5) "The policy should not be a tool to be used for allocating outside of the Board's allocation criteria."

I urge you to consider the larger picture when deciding whether to accept UCIDA's agenda change request, because what they are proposing would certainly promote the practice of other groups requesting changes to management plans throughout the state.

Sustainability of all salmon stocks is, of course, in the best interest of everyone in the state of Alaska. However, UCIDA's proposal hamstring Kodiak's salmon managers, taking away the tools they need to effectively manage a complex, multi-species salmon fishery. Although I am a new site owner, I have been fishing my whole life and have been steeped in the history of Kodiak's salmon fishery. I know that Kodiak's management plans have been developed carefully to manage the complex nature of our fishery; they are not just about sockeye. The plans also take into account chum, coho, and pink salmon. If our fishing time is to be curtailed, how will that affect the health and sustainability of ALL of our species? What will stop over-escapement? In the Northwest Kodiak District, we have seen first-hand the effects of over escapement at Karluk, which caused a huge crash of the system and basically created "disaster fishing" for sockeyes from (2008 to 2012) for many of us. UCIDA supporters will argue that we can fish the inner bays. This is not a solution for several reasons. Setnetting is not allowed in the inner bays, so only part of the users of Kodiak would be able to access those fish; the fish are of lower quality and that is the last thing we want to put on the market; and most alarmingly, weather and other events of nature and run timing can



more easily allow over-escapement to occur. We must allow Kodiak's fisheries managers the tools to manage the different KMA areas for long-term sustainability, and this UCIDA proposal basically erases those tools by mandating closures not based on science but on arbitrarily chosen numbers.

The proposal would have severe economic repercussions, as well. Kodiak has been managed in the same manner for decades, and has a whole economy built on the stability of the commercial salmon fishery. This proposal ignores the other species we rely on in Kodiak – pinks are my bread and butter – and would significantly hurt my bottom line. If the UCIDA proposal had been in effect, in 2014 62% of my fish were caught during their 5-week timeframe, in 2015 35% of my fish were caught then, and in 2016 37% of my fish were caught then. Losing out on that significant poundage would be extremely detrimental to my ability to continue making it work to be a fisherman. It isn't just a matter of a few fishermen's livelihoods being torn apart, though – it's a matter of the whole community struggling to stay afloat. We are talking about a loss of between \$3.9 and \$8.3 million dollars per year for the community, money that generates stable jobs not just for the fishermen, but also for cannery workers and fish processors, as well as the marine service industry. Losing those tax dollars would have a significant negative effect on Kodiak's overall health as a community.

Quite simply, we have a new genetic study with more detailed and up to date scientific analysis and methods, but the information it contains regarding the mixed stock nature of Kodiak's fisheries is NOT new and WAS taken into account when the management plans were set up. I'm old enough to remember my parents writing letters to the BOF regarding the Kodiak/Cook Inlet conflicts and discussions that took place in the early 90's over the exact same issue. The agenda change request by UCIDA does not present a conservation concern, nor does it address an error in regulation. In addition, it would set a dangerous precedent about mixed stock management statewide, would derail ADF&G's ability to manage Kodiak's salmon runs for sustainability, and would have a terrible impact on the entire economy of Kodiak Island. For these reasons, I oppose UCIDA's agenda change request.

Thank you for your work and deliberation on this important issue.

Sincerely,

Adelia B. Myrick

Uganik Bay Setnetter





# Afognak

Four square icons representing different aspects of the corporation: a fish, a person, a spiral, and a bird.

**Native Corporation**

## **BOARD OF DIRECTORS RESOLUTION #2017-24**

### **A RESOLUTION TO THE ALASKA BOARD OF FISHERIES OPPOSING OUT OF CYCLE SCHEDULING OF KODIAK MANAGEMENT AREA FINFISH ISSUES**

**WHEREAS**, Afognak Native Corporation is an ANCSA village corporation headquartered in Kodiak, Alaska with the majority of our Shareholders residing in Port Lions, Kodiak, and the Anchorage area; and

**WHEREAS**, fisheries and access to marine resources have always been a foundational resource for these island communities and we rely on strong fisheries and resident fishermen to thrive; and

**WHEREAS**, the Alaska Board of Fisheries has established a 3-year cycle for their agenda schedule in addressing finfish issues in each of Alaska's fisheries management areas; and

**WHEREAS**, the Alaska Board of Fisheries just completed the Kodiak finfish cycle meeting in Kodiak to discuss Kodiak finfish issues in January of 2017; and

**WHEREAS**, exceptions to the Alaska Board of Fisheries 3-year cycle for addressing area finfish issues are narrowly outlined in the Board's "Policy for Changing Board of Fisheries Agenda" and such "Agenda Change Requests" (ACRs) are only heard by the Board during their "first meeting in the fall"; and

**WHEREAS**, United Cook Inlet Drift Association (UCIDA) has submitted an Agenda Change Request (#11) to have the Board schedule Kodiak finfish issues out of cycle during the Board's 2017-18 meeting schedule to "address the harvests of Cook Inlet and other non-local salmon stocks in the Kodiak Area"; and

**WHEREAS**, the UCIDA Agenda Change Request does not meet the Alaska Board of Fisheries' criteria for approval in that it is not; a. for a fishery conservation purpose or reason, b. to correct an error in a regulation or c. to correct an effect on a fishery that was unforeseen when a regulation was adopted; and

**WHEREAS**, the UCIDA Agenda Change Request states on its face that it is "address the harvests of Cook Inlet and other non-local salmon stocks in the Kodiak Area"; and



**WHEREAS**, the Alaska Board of Fisheries Policy for Changing Board of Fisheries Agenda clearly states that “the board will not accept an agenda change request that is predominately allocative in nature absent new information found by the board to be compelling”; and

**WHEREAS**, the UCIDA Agenda Change Request is entirely allocative in nature and information about the opportunistic harvest of Cook Inlet bound sockeye in the Kodiak Management Area while fishing for local stocks has been known for more than 70 years and was documented before the Alaska Board of Fisheries 25 years ago with research reaching back to the 1940s with estimates of the presence of Cook Inlet sockeye in the Kodiak Management Area ranging from 0 to 60%; and

**WHEREAS**, the 2016 report on the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in the Kodiak Management Area, 2014-2016 merely provides additional detail to information already known by the Alaska Board of Fisheries about the opportunist harvest of Cook Inlet bound sockeye in the Kodiak Management Area and was not an assessment for allocative purposes;

**THEREFORE BE IT RESOLVED** that the Alaska Board of Fisheries reject the UCIDA agenda change proposal to address, out of cycle, the harvest of Cook Inlet stocks in the Kodiak area;

**AND THEREFORE BE IT FURTHER RESOLVED** that the Board of Fisheries leave the issue of the harvest of Cook Inlet bound sockeye caught in the Kodiak Management Area to be thoroughly vetted through the normal Board of Fisheries process during the 2019-2020 Kodiak finfish meeting.

  
Gerad Godfrey, Board Chair

Certification: I hereby certify that the foregoing resolution was duly adopted by the Board of Directors of Afognak Native Corporation in accordance with its organic documents on September 29, 2017.

  
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Kristy Clement, Board Secretary



Submitted By  
Alan Otness  
Submitted On  
10/2/2017 10:21:11 AM  
Affiliation  
Sitka sac roe permit holder  
  
Phone  
9077723458  
Email  
[adotness@gmail.com](mailto:adotness@gmail.com)  
Address  
696 Mitkof hwy box 317  
Petersburg, Alaska 998330

Dear Chairman Jensen:

I am writing to give my support for proposal EF-F17-067. There are many good reasons why this proposal , open pound spawn on kelp as an alternative to seining , makes sense.

I was involved with the experiment to test the open pound idea in Sitka and came away from that experience enthusiastic about the possibilities. Let's make this happen.

Sincerely, Alan Otness. Sitka Sac Roe Permit Holder

September 21, 2017

Alaska Department of Fish and Game  
Boards Support Section – Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Attn: Alaska Board of Fisheries

John Jensen, Chair  
Orville Huntington  
Fritz Johnson

Israel Payton  
Alan Cain

Robert Ruffner  
Reed Morisky

Re: Requesting the Board of Fisheries Reject Agenda Change Request 12

Dear Chair Jensen,

The Aleut Corporation urges the Alaska Board of Fisheries to reject ACR 12 that will be discussed at the October 17-19, 2017 Work Session. The Aleut Corporation believes that ACR 12 does not meet the guidelines listed under 5 AAC 39.999 for accepting the ACR.

**1. There are no fishery conservation concerns.**

Current regulations in place are sufficient to manage the Dolgoi fishery. Harvests of sockeye salmon in this area has not lead to a conservation concern of Chignik sockeye salmon.

- a. In 2016 Chignik early run and late run sockeye salmon escapement goals were met, with the late run exceeding the escapement goal.
- b. The In River Run Goal (IRRG) for subsistence harvest of 25,000 sockeye in August and 50,000 sockeye in September were also exceeded for both months.
- c. Further Chignik commercial harvests of sockeye salmon were similar to the 10- and 20-year average harvest and only slightly lower to that of the 5-year harvest.
- d. The 2017 data is preliminary and the 2017 Annual Management Report has not been published yet.

**2. There is no error in regulation.**

In 2016, at the Alaska Peninsula/ Aleutian Island/ Chignik Finfish meeting, the Board amended regulations for the *South Unimak and Shumagin Islands June Salmon Management Plan (5AAC 09.365)* and the *Post-June Salmon Management Plan for the South Alaska Peninsula (5AAC 09.366)*. The regulations were amended to reflect the agreement made by the two user groups



and the Department has been careful to enact the rules as written during the fishing season.

- a. As stated in the 2016 AMR the fishery was closed as stated in Regulations. *“On June 21, the harvest limit of 191,000 sockeye salmon, based on fish ticket information, was reached in the “Dolgoi Island Area”. After a 12-hour notice was given to the fleet, the portion of West Pavlof Bay Section south of Black Point and waters of the Volcano Bay Section closed to commercial salmon fishing through July 25.”*
- b. The 2017 data is preliminary and the 2017 Annual Management Report has not been published yet.

**3. There were no unforeseen effects from the current regulations.**

The regulations that were adopted at the February 2016 Board meeting and amended at the 2016 BOF meeting are working as intended. These regulations have been in place for two fishing seasons and only the 2016 seasons data and Annual Management Report is finalized and published.

With only one years' worth of data it is not enough to see a trend in the Dolgoi fishery. In fact, in 2016 all escapement goals were met and exceeded and the Chignik Commercial Fishery was healthy and similar to that of the 10- and 20-year average. At the February 2019 meeting the Board will have three years of data under the new regulations to better inform the next decision on this issue.

**4. This ACR is allocative in nature.**

For the proposals regarding the Dolgoi Fishery at the 2016 Alaska Peninsula/ Aleutian Island/ Chignik Finfish proposals regarding the Alaska Department of Fish and Game remained neutral on the allocative aspects of those proposals. This proposal is similar to those proposals in that there is no conservation concern and no unforeseen effects from the 2016 regulation change and it is one user group trying to limit another.

Therefore, we respectfully request the Alaska Board of Fisheries reject ACR 12 at the October 17-19, 2017 Work Session. Thank you for the opportunity to provide written comment.

Sincerely,

Thomas Mack  
President  
Aleut Corporation





Alaska Board of Fisheries  
P.O Box 115526  
Juneau, Alaska 99811-5526

Board of Fisheries Members:

The Aleutian King Crab Research Foundation submitted Agenda Change Request (ACR) 02, which seeks to have the Board consider the Aleutian Islands golden king crab fishery harvest caps out of cycle. The Board is asked to schedule consideration of repealing the existing harvest caps and adopting a management strategy being developed by the Alaska Department of Fish and Game (ADF&G) using the outputs of a newly adopted golden king crab population model.

Briefly, these harvest caps, or Total Allowable Catch levels (TACs), were set in about 1996 based on fishery and stock conditions at that time. The Board subsequently made minor adjustments on two occasions, increasing the caps by 5% each time. The department is allowed to reduce the harvest below the caps, but may not increase the harvest over the caps. The harvest caps are a single number and do not take other characteristics of the stock, such as mature and legal male biomass, into consideration. The Board also specified that the caps would stay in place until the golden king crab population model was adopted and ADF&G developed a harvest strategy based on that model.

The North Pacific Fishery Management Council's (NPFMC) Crab Plan Team (CPT) and Scientific and Statistical Committee (SSC) have now adopted the golden king crab model developed by ADF&G and have used that model to set the Overfishing Limit (OFL) and the Allowable Biological Catch (ABC). The model was accepted at the September 2016 CPT and October 2016 SSC meetings for use in setting OFL and ABC at the May 2017 CPT and June 2017 SSC meetings. Unfortunately, this was too late to allow this issue to be considered at the regular King and Tanner crab meeting in March 2017.

ADF&G staff are now developing a harvest strategy, based on similar strategies for other Bering Sea Aleutian Island crab stocks, which uses the outputs of this model to set harvest levels and management triggers that better ensure conservation of Aleutian Islands golden king crab. This harvest strategy could be considered and implemented during the upcoming Board cycle. Waiting until the next regular Board meeting would mean two additional years of management under outdated harvest caps.

I encourage you to accept this ACR. It fits your criteria for acceptance under both criteria one and two. That, is the ACR serves a conservation purpose (criterion 1) and it deals with what is now essentially an error in regulation (criterion 2).

Criterion 1: The current harvest caps were set based on the best available information at the time they were implemented for the 1996/97 season. Since that time, the stock status and nature of the fishery have changed dramatically. Additionally, ADF&G, the CPT, and the SSC have put significant effort over many years into developing a useful model. With the acceptance of the golden king crab model and setting of OFL and ABC through the NPFMC process, the regulatory harvest caps no longer represent the best available information for managing the stock. Only through acceptance of the ADF&G developed harvest strategy based on model outputs can the board ensure management based on the best available



information. Waiting until the next regular King and Tanner Crab meeting will delay implementation of this improved management system by two years and delay the improvements in conservation that go with it.

Criterion 2: The harvest caps adopted in the mid-1990s and only modestly updated since then, worked surprisingly well for many years. But they are now so out of date as to be considered in error. Outputs of the model confirm that these caps no longer represent the best available information for management of the fishery. Additionally, they do not contain important management triggers that will help protect the stock. Continuing to use them for two additional years only delays improvement of management and potentially impacts the fishery and the industry.

The final issue to be considered is whether the proposed ACR is allocative and the answer is no. This fishery was rationalized in 2005. Therefore, each vessel operates under a quota share that will not change relative to other vessels if this ACR is accepted.

I appreciate your consideration of this issue and hope you will agree that this ACR meets your criteria and is worthy of acceptance.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. Poulsen".

Edward Poulsen  
Vice President for Research  
Aleutian King Crab Research Foundation





September 26, 2017

Chairman John Jensen, Alaska Board of Fisheries  
Board Support, P.O. Box 115526  
Juneau, AK, 99811-5526

Re: In support of Board of Fisheries ACR policy found in 5 AAC 39.999

Dear Chairman Jensen,

The Aleutians East Borough Natural Resources Department works with local fishermen, processors and the communities of King Cove, Sand Point, Cold Bay, False Pass, Nelson Lagoon and Akutan to navigate local fishery management issues, including Board of Fisheries proposals and agenda change requests.

We urge the Board of Fisheries to closely follow your policy for considering agenda change requests, found in 5 AAC 39.999, when you consider ACRs at your October 17-19, 2017 Work Session.

In particular, we believe ACR 12 does not meet the Board criteria for approving an ACR:

This is predominantly an allocative issue and the ACR should be denied. There is no new information that warrants this issue be addressed out of cycle. The new Dolgoi Island Area salmon fishery regulations were initiated by the Board just last year, at the February 2016 meeting. The original Proposal 186 was substituted with language in RC 192, as a compromise between Chignik & South Peninsula fishermen. When the number of sockeye salmon harvested in the season reached 191,000 based on fish ticket information, a portion of the area was closed. These regulations have only been in place for the 2016 & 2017 salmon seasons, implemented by ADFG salmon managers as written by the Board.

There is no fishery conservation issue to be resolved. Chignik escapement goals are being met and Chignik fishermen are able to harvest salmon.

There is no error in the regulation. The new Dolgoi Island Area regulations were vetted by staff to be without error and carefully crafted by the Board, based on an agreement between the two stakeholder groups.

There has been no unforeseen effect on the fishery. The Dolgoi Island Area regulations have limited the amount of sockeye salmon harvest in the Dolgoi Island Area as intended. The fishing areas were closed when the trigger was reached based on fish ticket information.

We believe the Board should only accept agenda change requests that meet the Board criteria found in 5 AAC 39.999. ACR 12 does not meet those criteria. Thank you for opportunity to comment.

Sincerely,

Ernie Weiss, Natural Resources Director



## RESOLUTION 18-03

### **A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY IN SUPPORT OF NO CHANGES TO THE ALASKA BOARD OF FISHERIES 2017/2018 MEETING CYCLE AGENDA.**

**WHEREAS**, the Aleutians East Borough communities rely on continued North & South Alaska Peninsula local salmon fishery harvests for our culture, economy and livelihood; and,

**WHEREAS**, most of Alaska salmon stocks are mixed and many regions of the State benefit from the Alaska Board of Fisheries' Mixed Stock Fishery/Sustainable Salmon policies, including Chignik fishermen, known interceptors of South Alaska Peninsula bound salmon; and

**WHEREAS**, the Board adopted new regulations in 2016 intending to limit sockeye harvest in the 'Dolgoi Island area', ADFG statistical areas 283-15 through 283-26 and 284-36 through 284-42, by imposing a 191,000 sockeye limit in the area that would trigger a fishing closure in statistical areas 284-37 through 284-39, and area 283-26; and

**WHEREAS**, the ADFG data in 2016 indicated that the 191,000 limit would have been reached only 4 of 10 years, had the policy been in place from 2006 to 2015; and

**WHEREAS**, the 191,000 sockeye limit and resulting fishing closures have occurred in both salmon seasons, 2016 & 2017, since the regulations have been in place; and

**WHEREAS**, the Board published 18 agenda change requests (ACRs) this month to be considered at the October 2017 Board Work Session, including ACR 12 submitted by the Chignik Regional Aquaculture Association ; and,

**WHEREAS**, if adopted, ACR 12 would further restrict sockeye harvest in the Dolgoi Island area; and

**WHEREAS**, the Dolgoi Island area is at the heart of the Aleutians East Borough South Alaska Peninsula salmon fishing area, between the fishing communities of King Cove and Sand Point; and

**WHEREAS**, ACR 12 does not meet the Board criteria for approving an agenda change request in 5 AAC 39.999.



**NOW THEREFORE BE IT RESOLVED**, the Aleutians East Borough Assembly supports no changes to the Alaska Board of Fisheries 2017/2018 meeting cycle agenda; and

**PASSED AND APPROVED** by the Aleutians East Borough on this 22 day of September, 2017.

  
**Stanley Mack, Mayor**

ATTEST:   
**Tina Anderson, Clerk**



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

Sept 27<sup>th</sup>, 2017

Opposed UCIDA ACR & Genetic Stock Composition of Sockeye in Kodiak Area

Chairman John Jensen/ Alaska Board of Fish,

My name is Amanda Floyd. I grew up in Kodiak and now work at a retail shop that sells ATV's, motorcycles, outboards, and does maintenance & repairs. I'm opposed to this ACR as it represents a 30% loss of catch for Kodiak's fishermen. Kodiak's salmon fishery has a large influence on sales in the store that I work in. Salmon fishermen are the ones that buy outboards for their skiffs. At the end of salmon, it's the skippers and crewmembers that are in purchasing bikes and the gear for them.

Adopting measures that create a 30% reduction in catch for Kodiak would cut into crew shares and would make a lot of the boats unprofitable. It would mean less customers in the store I work in. It might even mean that my position would be cut due to less sales.

Kodiak is my hometown and it is facing a local sales tax hike, a lack of affordable housing, and uncertain revenue funding for the City & Borough Governments. We certainly can't afford a cut of this magnitude to our fish landings and raw fish tax during a time when state and federal funds are drying up.

Please say no to ACR 11. It causes economic hardship and uncertainty throughout the Kodiak community.

Amanda Floyd  
1418 Mission Rd  
Kodiak Alaska 99615

A handwritten signature in black ink that reads "Amanda Floyd".



Submitted By  
Anitra Winkler  
Submitted On  
10/3/2017 8:53:34 PM  
Affiliation  
commercial fisherman

Phone  
907 355 3933  
Email  
[anitrawinkler@gmail.com](mailto:anitrawinkler@gmail.com)  
Address  
Box KWP  
Kodiak , Alaska 99697

To whom it may concern;

I am writing in regards to the UCIDA's agenda change request as it clearly does not fit the criteria for an ACR. Further I am very concerned by the ACR and how it or something like it would impact my fishery.

I am 24 years old and I am a life long Alaskan. I grew up in the interior near Cantwell and dog mushed through high school. I was first introduced to commercial fishing when I was 16 when I got a job fishing salmon on Kodiak and immediately decided I wanted to see more of coastal Alaska. I have fished ever since, through college and then last winter I purchased my own site. This summer was my first season as owner/operator and I did fairly well mostly because we had a lot of fishing time. Salmon money has funded a significant portion of what I do; it paid for most of my college (I have a bachelor's degree from UAS in Juneau) and also for the down payment on my site.

As a young person investing in the salmon industry it is frightening anyway with all of the potential problems climate change, development, salmon farms etc. could cause over my life time. I had not thought the issue would be another part of the state trying to narrowly if at all increase their profit margin at another fisheries expense. If I could not fish during the times that this ACR would have us closed my fishery would not be viable. The margins are very thin to begin with and to lose 30% of our income would be catastrophic, the Kodiak set net fishery would be over. As a 24 year owes with big payments to make this is a scary thought.

Historically Kodiak has always caught some percentage of Cook Inlet reds, just like nearly every other area of the state is catching some percentage of another areas fish. It seems ridiculous to me to shut down the Kodiak island salmon fishery so that another area can get a negligible amount more fish. Further if we were closed during those times all of our local streams would over escape and our runs would fail so that even when we did have time to fish there wouldn't be any. Currently our runs seem to be managed quite well and all of that hard work would be wasted.

I disagree with this ACR first of all on the basis that it should not have been accepted as an ACR. There is nothing new introduced by this study, there is no basis for an ACR. Secondly the contents of this ACR would end my fishery and leave me with two hundred thousand dollars of now not useful equipment and permits that I couldn't pay off. I hope that we can all agree that just because Cook Inlet has the higher population it doesn't mean other fisheries should be crippled for it's slight advantage. Thank you for your time.

Sincerely,

Anitra Winkler



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

Oct 1,2017

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

OPPOSED

Chairman John Jensen,

My name is Beau Mann. I was born and raised in Kodiak. I graduated in January of 2016. After graduation, I got a job on a local combination 58 ft seiner for pot fishing P Cod. I fished Kodiak area and out west for 5 months returning back home- where I found a job on a 50 ft salmon seiner. At 19 years old, I have found a job that pays my bills. I also know that if I am going to become a skipper and own a boat, I will need to pay attention to regulations that affect the fisheries I participate in.

It's hard for me to believe that ACR 11 will do anything to help with conservation concerns in Cook Inlet. It seems to me that it gives a bit more fish to one area (Cook Inlet), wreaks havoc for Kodiak's west side, and solves nothing. Also, the proposer states that the ACR is allocative. If you combine the chaos created for salmon runs in Kodiak, the intention to re allocate fish, and the zero proof that the this would have measurable results- The Board of Fish should not consider ACR 11, and especially not out of cycle. I don't think the Board should ignore the fact that Kodiak's local salmon would most likely suffer over escapement if this action is taken.

I'd respectfully ask the Board of Fish to take no action on ACR 11 for all the above-mentioned reasons.

A handwritten signature in cursive script that reads "Beau Mann".

Beau Mann

3454 Spruce Cape Rd

Kodiak Alaska 99615



October 1, 2017

Alaska Board of Fisheries,

My name is Bill Menish and I have been a Sitka Sound sac roe permit holder and participant since before limited entry. I also am a permit holder in the Northern closed pound fishery and participated in that fishery for 8 years until it was shut down for lack of herring. In that fishery, I believe we, as fisherman, are responsible for the demise of the Northern closed pound fishery.

I am in full support of Proposal EF-F-17-06 to allow open pounding in the Sitka sac roe fishery as an alternative to seining. The open pounding has proven to work well in the past experimental fishery in 1998-1999 in Sitka Sound which I was involved in. It is truly a green fishery with no dead loss unlike closed pounding where I have seen a lot of dead loss. You cannot keep stuffing more and more herring into a small enclosure and not have major fatalities.

This proposal gives fisherman a chance to increase the value of the fishery and more herring would swim off, helping the biomass remain strong.

I urge the Board to act on this proposal to help maintain a healthy biomass. Killing less herring and yet increasing the value of the fishery is a very positive thing. Open pounding will achieve this.

Thank you.

Bill Menish





Brad Marden  
FV Omega Centauri  
PO Box 2856  
Homer, AK 99603

October 1, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Jensen and Members of the Alaska Board of Fish,

I am an Alaska resident, a Kenai Peninsula Borough resident, and a Kodiak seiner, and would like to comment on the proposed UCIDA Agenda Change Request (ACR 11) and the Genetic Stock Composition of Sockeye Salmon in the Kodiak Management Area (KMA).

I strongly oppose the UCIDA's agenda change request (ACR 11). This is an attempt by UCIDA to make an allocative fish grab, concealed behind a thin veil of "new science". While genetic stock composition studies may offer ADF&G fisheries managers new tools to help with management, it would be dangerous and irresponsible to cherry-pick these studies for major allocation decisions. The breadth and scope of these genetic studies is inadequate for use in any management decisions at this time. ACR 11 fails to meet the Board's agenda change request criteria because it does not present any new information that "corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted".

I have been living in Alaska on the Kenai peninsula for 12 years, am married to a lifelong Alaska resident, and our two children were born and raised here in Alaska. I have fished for a living since moving to Alaska. Fishing is my sole occupation and is our family's primary income. I have deckhanded in both Cook Inlet and Kodiak waters, but deliberately chose to invest in a Kodiak seine operation and have fished Kodiak waters exclusively for the past 5 years. I intend to remain in this fishery. Setting rigid constrictions on sockeye harvest in June and July would negatively affect my ability to earn a living for my family.

Claims by UCIDA that call for a reallocation due to socioeconomic hardships on the Kenai Peninsula shouldn't be given serious consideration. In today's world, fishermen do not always reside where they fish. Many upper Cook Inlet fishermen do reside far away from Cook Inlet or even out of state, and many Kodiak fishermen live on the Kenai Peninsula, and proudly support local peninsula businesses, pay city and borough taxes, etc. Many of us spend our fishing dollars in the same stores as UCIDA fishermen. My point is that both Cook Inlet and Kodiak fishing fleets are mobile, modern, and



diversified, and that there is no justification for major reallocation based on regional hardships on the Kenai Peninsula.

I disagree allocative nature of UCIDA's proposal, but furthermore the mechanism for fisheries management proposed in ACR 11 is profoundly flawed. New management plans may consider genetic studies, but should not be centered around a relatively small genetic study. With regard to genetic composition research, we should be aware and wary of the limitations of this expensive, labor-intensive, fine-scale tool which only provides a momentary glimpse of the genetic makeup of one region's harvest. If we can't use genetic stock studies consistently and throughout the state, it is inappropriate to cherry-pick these studies to conclude about rates of salmon interception. New management plans should allow ADF&G to have maximum flexibility, both spatially and temporally. ACR 11 allows for much less flexibility in management and attempts to lock in rigid harvest allowances that would serve more to dramatically hinder the Kodiak fleet's efficient harvest of local fish than to aid the Cook Inlet fleet.

ACR 11 seeks to ignore the historical precedent that some component of every fishery is intercept in nature. Area M fishermen intercept some Kodiak-bound fish and this has always occurred. Kasilof fishermen intercept some Susitna-bound fish and this has always occurred. Kodiak fishermen have a strong historical precedent of intercept being a component of their overall harvest, and this has long been recognized by the BOF.

Fisheries management for the KMA is, and should continue to be, based on protection and sustainable harvest of local watersheds and regional KMA stocks. Significantly altering the management plan to prioritize the avoidance of "outside" fish (specifically upper Cook Inlet fish) at the expense of all other local considerations will result in poor management of local Kodiak streams. Biologists should be given the freedom to make in-season management decisions, rather than be locked in by hard dates and harvest allowances. Foregone harvest of pink and chum salmon, as well as overescapment of sockeye in the Karluk and other watersheds, would likely result from ACR 11.

The UCIDA agenda change request, ACR 11, simply does not meet the Board of Fisheries Agenda Change Request criteria. While an interesting tool, genetic stock studies provide no profoundly new information with regard to KMA harvest; they are simply a momentary glimpse of the makeup of harvest in one spot at one time. The UCIDA proposal is allocative in nature, and there is no compelling economic case for a reallocation. New management plans should be created when there is a specific, urgent, new need: this is not the case here.

Sincerely,  
Brad Marden  
FV Omega Centauri  
Homer, AK



Brian McWethy  
PO Box 8552  
Kodiak AK 99615  
907 942-5583

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811

RE: UCIDA Agenda Change Request and Genetic Stock  
Composition of Sockeye Salmon in the Kodiak  
Management Area

I am opposed to the UCIDA agenda change request because it does not meet the board's agenda change criteria. There is no error in regulation that needs correcting.

I'm a second generation salmon seine skipper, I'm 30 years old and have been running my own boat since 2009. I recently purchased a larger boat and have based my business plan on the fact I can fish where we have traditionally fished in Kodiak. I make 100% of my income salmon seining in the Kodiak area.

Any change needs much more scientific data. Please take into consideration the limits of this study and gather more information before you make any changes to the agenda.

Please don't disrupt our fishery for short sighted goals, incomplete studies, and pressure from competing fishing groups.

Sincerely,

Brian McWethy

A handwritten signature in cursive script, appearing to read "Brian McWethy".



Bryan Horn  
1776 Mission Rd  
Kodiak, AK 99615  
10/3/2017

Chairman John Jensen  
Alaska Board of Fisheries  
Board Support Section  
Po Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda change request and Genetic Stock Composition of Sockeye Salmon in the Kodiak Management Area.

I Bryan Horn, oppose the UCIDA agenda change request. This request does not meet the Boards agenda change request criteria. The stock composition study did not provide any new information into fish caught in the Kodiak area. It did however, provide an anomaly in which Kodiak seiners harvested Cook Inlet sockeye in the Igvak section of the Kodiak Area. There have not been any errors in regulations and Cook Inlet sockeye caught in the Kodiak area do not create a conservation concern.

I am a third generation Kodiak salmon seine fisherman I am 35 years old. Salmon fishing in Kodiak has sustained my family for generations. My grandfather began salmon seining in 1947, at this time he fished Cook Inlet, Kodiak and Chignik. This was prior to area registration. My father has been involved in the salmon fishery on Kodiak for 50 years. I have been on the boat my entire life. At the age of 13 I began doing full share fill in trips as a crew member. When I was 14 I completed my first full share season as a crew member. I purchased my Kodiak salmon seine permit when I was 16 years of age. This summer was my 16<sup>th</sup> year as captain of a seine boat in Kodiak. I now have five children in my household, three of which already have began making commercial salmon trips with me, while the other two can't wait until they are old enough.

This agenda change request does not make any sense because it derives from an anomaly of Cook Inlet sockeye caught in the Igvak section of the Kodiak area. However, their request does not address the Igvak section at all, they are targeting the fishery around Kodiak Island itself by tying the openings and closures to the North Mainland fishery. Kodiak salmon fishermen already have limited fishing time in the North Mainland section of the Kodiak area. The reason is for Cook Inlet sockeye to pass through the Kodiak area unabated. If this agenda change request were to pass it would create a major gear conflict in the Kodiak area between gillnetters and seiners. This would also create a reallocation of the salmon caught in Kodiak.

The Cook Inlet sockeye caught in the Igvak section of the Kodiak area were traveling south when harvested. This leads me to believe they probably have traveled or will travel through the Chignik area as well. If the UCIDA request were to pass it would create a precedence for management plan changes all over the state. Which in itself could be



detrimental to the sustainability of salmon statewide. Look at Chignik Pink salmon harvest for this last summer, a record catch by far. Were all those pinks traveling through the Chignik area destined for a Chignik area river system? Seems highly unlikely by looking at their historic catch numbers for pink salmon, these fish were most likely trying to return to Area M or Kodiak when they got caught. The Kodiak area Pink salmon came in historically late this year, as well as the Coho returning to Cook Inlet came in late. These are things we cannot control, we cannot control where and when fish swim. What we do know is that all of these fisheries have been around for 100 years, these fisheries have sustained quite remarkably with the current well thought out fishery management strategies.

This proposal does nothing to address the economical effects to the City of Kodiak. Not for just the fishermen and processors involved in the Kodiak Salmon Season, but the trickle down effect to the entire town. The diesel mechanics, local welders, marine gear stores, all the way down to the local four wheeler shops. Everyone in Kodiak feels it when there is a bad salmon season. We had a perfect example of this last winter after the disastrous salmon season in 2016. Kodiak is different than other Areas of the state in that fifty-three percent (53%) of Kodiak Salmon Seinners live in Kodiak year round, so if the salmon season is poor the entire town feels the effect.

The Kodiak Area management plan is in effect to manage local stocks of salmon and to keep everything in balance around the state. Such as the Cape Igvak management plan to keep Chignik in mind and the North Shelikof management plan to keep Cook Inlet in mind. Because the North Shelikof management plan already exists proves that no new information has been provided from the stock composition study. There are no plans in place that keep the local Kodiak stocks in mind except for the Kodiak area management plan. If this plan was to be overhauled for the benefit of another area in the state it will create multiple unforeseen problems in and around the local Kodiak salmon stocks. It will make it impossible for the Alaska Department of Fish and Game to manage our local stocks efficiently. Which would be detrimental to the Community of Kodiak.

The UCIDA agenda change request does not meet the Boards criteria for an agenda change request. There has been no new information provided, there has not been any errors in regulation and there are no conservation concerns with Cook Inlet sockeye harvested in the Kodiak area.

Sincerely yours,

Bryan Horn  
Abby Brown  
Madden Horn  
Haven Horn  
Ganyon Nelson  
Raylan Brown  
Julianne Horn



Submitted By  
Celeste Beck-Goodell  
Submitted On  
10/2/2017 12:24:21 PM  
Affiliation

Phone  
9079427771  
Email  
[cbgoodell@gmail.com](mailto:cbgoodell@gmail.com)  
Address  
P.O. Box 3108  
Kodiak, Alaska 99615

I am writing in opposition of the UCIDA agenda change request brought against the Kodiak Management Plan, for multiple reasons. These reasons include the genetic stock composition study did not produce ground breaking information and the Cook Inlet sockeye caught around Kodiak does not pose a threat to the strength of the Cook Inlet sockeye run. Overall there is no change in the Kodiak Management Plan that needs to occur.

As the daughter of a family that owns two set net permits in the Northwest Kodiak section I have been involved in this fishery since birth. For going on 24 years my family has depended on salmon to produce more than 90% of our annual income. The fish caught between June 23rd to July 31st are a large portion of our season, during that time frame we catch all salmon species: sockeye, coho, chum, and pinks. As my parent's age up it would be impossible for a young person to make a living from salmon if the becomes harvest more restricted.

The agenda change request is completely one-sided and is not rational. The residents of Kodiak were not taken into consideration when this ACR was written. The natural variability of sockeye runs, financial impact for Kodiak and the impact on Kodiak sockeye stocks were not taken into account. Sockeye travel all over in the Pacific Ocean feeding in their adult life before returning home to their river systems, tracking every fish would be an unimaginable feat. The size of sockeye runs change between years in river systems all along the west coast, small and big years are natural. In Kodiak every summer there is an influx of people coming to crew for salmon operations; between 2014 to 2016 20 million dollars were made from salmon between June 23rd to July 31st. Those 20 million dollars makes up on average 29% of Kodiak's salmon revenue. The final reason the ACR is one-sided is that the continued health of the Kodiak sockeye systems were not taken into deliberation. The forgone catch of local sockeye and pink salmon would cause over-escapement leading to stock depletion in the Kodiak Management Area.

The Kodiak Management Area is a historical fishery that has been occurring in the same areas for hundreds of years. The Kodiak Management Plans are working because they focus on the health of local stocks and only allow harvest based on availability.

The UCIDA agenda change request does not meet the criteria for a Board of Fisheries Agenda Change Request, because the impact on Kodiak residents and sockeye stocks were not taken into account. Cook Inlet sockeye caught around Kodiak has not posed a threat to the strength of the Cook Inlet sockeye run over the years. There is no new information being presented in the agenda change request and no regulations need to be corrected or changed.

Sincerely,

Celeste Beck-Goodell



## ***Charles W. Treinen***

*2054 Arlington Drive  
Anchorage, Alaska 99517*

*Phone: (907) 345-2414 ♦ Cell: (907) 229-2478*

*E-mail: cwtreinen@aol.com*

October 2, 2017

John Jensen, Chairman  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Mr. Jensen and Members of the Board:

As a Kodiak salmon seine permit holder, I urge you to refrain from considering alteration of any Kodiak salmon management plans until the in-cycle meeting in 2020. I have not participated in the fishery in recent years, but I have retained the permit in anticipation of returning to fish the area in the future. Since S01K permit values--like all other limited entry permits--are based on the opportunities afforded a permit-holder, any change in those opportunities is crucially important and should only be done under the strict guidelines of the ACR policy. ACR 11 does not fit the ACR criteria of providing new information and is ridiculously complex and unworkable.

I was actively fishing the Kodiak Area during the last wave of Cook Inlet hysteria that resulted in the 1989 North Shelikof Management Plan. Board action on that plan was primarily related to sockeye catches that occurred on a record return to Upper Cook Inlet in 1989 and restricted the fishery primarily based on one year's catch. Fallout from that 1989 board action was partially responsible for adoption of the Mixed stock policy 5AAC 39.220 (d) that—for practical reasons--states "...Natural fluctuations in abundance of stocks harvested in a fishery will not be the single factor that identifies a fishery as expanding or new." Although many advocates of 'weak stock' management had hoped to use the mixed stock policy to restrict perceived harvest on their 'pet' stock, ADF&G staff realized that relative abundancies of stocks needed consideration in order to comply with constitutional mandates of MSY.

It should also be noted that at the 1989 meeting the three-mile territorial waters limit would be subsequently be enforced limiting the previous area fished by the Kodiak fleet. That action alone should have been sufficient to ensure that Cook Inlet could not be 'corked off' by the Kodiak fleet—if that was ever a realistic concern.





ACR 11 is an unworkable solution to a problem that only exists as a political expedient to the more acute problems facing the proposer and should be rejected for a variety of reasons. It is difficult to accept that there is anything new or time-critical enough to consider changes to Kodiak Management Plans out of cycle especially since 28 years has passed since the last action on the same subject. Please reject ACR 11.

Sincerely,

Charles W. Treinen



Submitted By

charlie johnson

Submitted On

10/3/2017 2:07:20 PM

Affiliation

kodiak commercial salmon fisherman

I am writing to state my opposition to the UCIDA agenda change request. I do not know if this request even meets the boards criteria for a change request. There has not been a conservation concern, the board knew that there were some cook inlet sockeye in the kodiak area when the kodiak management plan was adopted and there is no error in regulation. I have been a seiner in kodiak for 23 years and this would have huge effect on the kodiak fleet in a negiteve way. I don't believe a three year study should change the kodiak management plan when it has been working for almost 30 years. Cook inlet fish can show up any where when different storms and tides combine, chignik, area m, kodiak. What about kodiak fish getting intercepted? are we going to start studies to see who we have to shut down. Lets keep the kodiak management plan. Please do not totally distrust one fishery for minimal gain to another. thank you.



Submitted By  
Christopher Johnson  
Submitted On  
10/2/2017 3:10:57 PM  
Affiliation

Christopher Johnson  
P.O. Box 151  
Kodiak, AK 99615

October 2, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request and Genetic Stock Composition of Sockeye Salmon in the Kodiak Management Area.

Dear Chairman Jensen and Board Members,

I'm a second-generation Kodiak fisherman. I purchased my vessel in 2012 and I'm one of the younger fishermen in the Kodiak fleet and I rely entirely on fishing for my income. I'm greatly concerned that the UCIDA agenda change request would put me and my family out of business. It's no exaggeration to say that if I were shut down during the 5 weeks as suggested in late June and July I wouldn't make my boat and permit payments, not to mention living expenses. It's particularly important for younger fishermen at the lower end of the production curve to have fishing time to pay our debt services in order to continue being rural fishermen. These closures will disproportionately impact the next generation of Kodiak salmon fishermen, and it's been well documented that barriers to entry and upward mobility are already challenging enough.

I know from experience that the presence of Cook Inlet bound sockeye in the Kodiak Management Area varies substantially from year to year and it is not predictable. This whole issue in the ACR and the genetic study seems to ignore or gloss over our local sockeye runs and the fact that our management plans are based on our local sockeye, and it's not just Karluk as Cook Inlet fishermen seem to think! Here in Kodiak we rely on early run sockeye into Ayakulik on the South end of the Island, Little River as well as Karluk on the West side, Little Kitoi, Litnik, Pauls Bay, little Waterfal, Foul Bay, Thorsheim, and Malina Creek on Afognak Island, Saltry on the East side of Kodiak island and then Kaffia Bay, Swishshak, Missak on the Mainland --- and that's just the early run. It's critical for the Board to understand that the Kodiak fishery is a fishery focused on local stocks **NOT** Cook Inlet sockeye.

I can't see how the Board can approve an agenda change request that is primarily an allocative proposal. It doesn't meet the Board's agenda change request criteria. I think that Cook Inlet fishermen, like fishermen in Kodiak or elsewhere, should wait until the regular Kodiak Board cycle in 2020 to have any allocative discussions.

Fishermen I know in Cook Inlet keep talking about increased efficiency of the Kodiak seine fleet and all of the new "super 8s". The Board needs to know two facts. First, we have fewer seine vessels fishing in Kodiak today than 10 years ago and significantly fewer vessels than 20 years ago. Second, I've looked at the active vessels and there is only one new "super 8" that actually fishes Kodiak salmon. Consequently, both the efficiency and the "super 8" assumptions by so many in Cook Inlet are simply false.

I hope to have a future as a salmon fisherman in Kodiak and I hope that my family has a future here. I worked hard to get and finance my 38-foot boat and permit and I continue to work hard each salmon season to provide for my family and future. I know that the UCIDA proposal will be the end of that dream. Please see the Kodiak sockeye genetic study in context of the full complexities of our Kodiak salmon fishery and let the issue follow the normal Board cycle.

Sincerely yours,

Christopher Johnson

Owner/Operator of the F/V North Star



Submitted By  
Chrystal Freerksen  
Submitted On  
9/23/2017 10:29:51 PM  
Affiliation

Phone  
8015565831

Email  
[Chrystaljack@hotmail.com](mailto:Chrystaljack@hotmail.com)

Address  
1112 Malutin Lane  
Kodiak , Alaska 99615

I am against this in every way possible. The livelihoods of a majority of kodiak residents rely on commercial fishing. This will our such an economic strain on our entire community.



Chuck McWethy  
PO Box 8552  
Kodiak AK 99615  
907 942-5541

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811

RE: UCIDA Agenda Change Request and Genetic Stock  
Composition of Sockeye Salmon in the Kodiak  
Management Area

Fish Board,

I am opposed to the UCIDA agenda change.

I'm the owner/operator of the F/V Shining Sea. I've seined since 1986 when I bought a seine permit. I've fished every except 1989 when the Exxon Valdez Oil Spill closed the salmon season. 90% of my family's income comes from salmon seining in Kodiak. My two sons (25 and 30) were raised fishing with me and have bought boats and Kodiak seine permits. 100% of their income comes from Kodiak seining.

Changing allocation from a 3 year study is a knee jerk reaction to a short study, taken during anomalous climatic conditions, run timing and migration patterns and water temperatures. These were all especially anomalous in 2016. These years were not "typical" years.

Proposed changes will alter fishing pressure-affecting all salmon fisherman and our bottom lines.

Any change needs much more scientific data. This is a big deal for Kodiak and will have serious effect on our livelihoods. Please don't react to an anomalous studies and pressure from other user groups.

Please get more information from more years in order to make a more realistic decision. This is our livelihood and any change will have far reaching effects which will be felt for generations

Sincerely,

Chuck McWethy

A handwritten signature in black ink, appearing to read 'Chuck McWethy', written over a white background.



Clint Johnson

P.O. Box 909  
Kodiak AK 99615

Oct 3, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P. O. Box 115526  
Juneau, AK. 99811-5526

As a Kodiak fisherman I oppose the UCIDA Agenda change as it does not meet agenda change criteria, it does not present any new information or correct unforeseeable effects of the existing management plan, there is not a conservation issue or error in regulation. It seems to be a political grab to allocate more fish to a specific group at our expense. Do we restrict area M for kodiak fish next? Or just go back to terminal harvest fisheries and fish traps?

I have been fishing salmon for 50 years already, and primarily a west side kodiak fisherman, the natural variability if our runs and direction they come in from does not lend itself to management from another District, closing areas for fish that may come by can cause local conservation/management issues.

Salmon are common property in our state, as such do not belong to their destination, sometimes our fish don't show up. Economic costs to individuals and the community can be severe if these runs are not managed for local harvest.

We have 57 management areas for local stocks in Kodiak, all historically fished, no new areas, and are seeing adequate returns with our current management, No new targeting of cook inlet fish occurs, since addressed by 1989 changes.

This UCIDA agenda change does not meet the request criteria, it is not a conservation issue and current regulations are working.

Sincerely

Clint Johnson  
F/V Kaiwik



**Concerned Area M Fishermen  
35717 Walkabout Rd.  
Homer, AK 99603**

**Alaska Board of Fisheries  
John Jensen, Chairman  
Board Support, P.O. Box 115526  
Juneau, AK, 99811-5526**

**Re: Agenda Change Request (ACR) #12**

Dear Mr. Jensen and Board of Fisheries members:

Concerned Area M Fishermen (CAMF) is requesting that the Board not support ACR #12, which you will be considering at your October 17 work session. CAMF represents salmon drift fishermen who fish the Alaska Peninsula and, though we don't participate in the fishery affected by this ACR, CAMF has always supported a sound, consistent process by which the Board considers requests such as this one.

In our view, none of the Board's established criteria for adoption of an ACR is met by this request. This ACR is predominately allocative in nature, and therefore not an issue that should be considered at an out-of-cycle meeting. Allocative issues, such as this one, should be vetted and debated with a proposal submitted for consideration at a regular meeting during the normal Board of Fisheries cycle.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Steve Brown".

Steve Brown, president





Conrad Peterson  
P.O. Box 29  
Old Harbor, AK 99643

September 25, 2017

John Jenson, Chairman  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request #11 and  
Genetic Report.

Dear Fisheries Board and Chairman Jenson,

The UCIDA agenda change request should not be approved by the Board. The proposal is just an attempt to reallocate fish and is not based on a biological concern or an emergency situation. The Board should just rely on the normal board cycle to address proposed changes to Kodiak Management Area finfish fisheries.

I've am a commercial fisherman and sportfish guide living in Old Harbor. I serve on the Old Harbor City Council and have been a Koniag Inc. board member for 10 years. I travel frequently to advocate for my community and our region. I know how critical the salmon fishery is to Kodiak and especially to Old Harbor. I also know how an issue can develop that seems more important than it actually is. This "new" genetic stock study on sockeye in the Kodiak management area may seem like a new thing but I see it more as providing additional information about what we already know. It's sort of like seeing a Bear with your eyes and then looking at it with binoculars. It's still a bear but you just see it with more detail. That's what the genetic study does. The added detail may seem important but it's simply more information about what has been occurring for as long as Cook Inlet bound salmon have been traveling in the Gulf of Alaska.

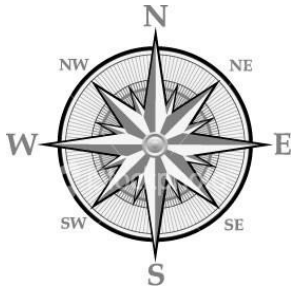
In my role as a Koniag board member, we have shifted some of Koniag's resources to work toward protecting our shareholder's fishery interests. We see substantial erosion of fishing opportunities for Kodiak's native people, especially in the rural communities. Further reduction of salmon fishing opportunities will push our native people to seek alternatives, perhaps through federal legislation, to continue access to salmon available locally.

In summary, this isn't the time to take up changing Kodiak's Finfish Management Plans. Let the respective stakeholders look to the regular Board cycle to address concerns. This is fair and will provide time to give perspective and, perhaps, additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Conrad Peterson', written over a horizontal line.

Conrad Peterson



# COOK INLET FISHERMAN'S FUND

Non-Profit Advocate for all Commercial Gear Types in Area H  
PO Box 39408 / Ninilchik, AK 99639 / Phone 907-252-2752 / Fax 907- 567-3306

ALASKA BOARD OF FISH, BOARD SUPPORT SECTION  
P.O. Box 115526  
JUNEAU, ALASKA 99811-5526

RE: AGENDA CHANGE REQUEST 11  
ATTN: JOHN JENSEN, CHAIR / BOARD MEMBERS

OCTOBER 3, 2017

CHAIRMAN JENSEN AND BOARD MEMBERS,

COOK INLET FISHERMAN'S FUND (BOARD OF DIRECTORS) SUPPORTS ACR 11 FOR THE BOARD OF FISH TO ADDRESS THE ANNUAL IN-SEASON INTERCEPTION/HARVEST LEVELS OF COOK INLET BOUND SOCKEYE SALMON BY THE SEINE FLEET WITHIN THE KODIAK MANAGEMENT AREA. THE BOARD OF FISHERIES RECOGNIZED THE ALLOCATION ISSUE IN 1989 AND DIRECTED THE DEPARTMENT TO LIMIT COOK INLET BOUND HARVEST LEVELS TO A 50,000 FISH CAP (5AAC 18.363 NORTH SHELIKOF STRAIT / SW AFOGNAK) ALONG WITH A 15,000 SOCKEYE CAP PROVISION WITHIN AFOGNAK/SHUYAK/MAINLAND.

SOCKEYE SALMON MANAGEMENT IN KODIAK DIRECTS THE DEPARTMENT TO MANAGE FOR LOCAL STOCKS AND EXPLICIT; I.E., STATED WITHIN EVERY PREAMBLE BY DISTRICT IN THE KODIAK MANAGEMENT AREA. THE BOARD'S INTENT HAS BEEN HISTORICALLY CLEAR ON THIS SUBJECT (LOCAL STOCKS VS. NON-LOCAL) AND MINIMIZE HARVEST OF COOK INLET SOCKEYE SALMON.

IT IS NOW DOCUMENTED BY GENETIC ANALYSIS (G.S.I) AND STOCK IDENTIFICATION OVER THE LEVELS OF COOK INLET BOUND SOCKEYE HARVEST IN-SEASON WITHIN THE KODIAK MANAGEMENT AREA - GROSSLY EXCEEDS THE BOARD'S DIRECTIVES. THESE LEVELS RANGE FROM HUNDREDS OF THOUSANDS OF COOK INLET ORIGIN SOCKEYE TO OVER A MILLION HARVESTED ANNUALLY AND TO THE DETRIMENT OF COOK INLET FISHERIES. TIME AND AREA MANAGEMENT CONSTRAINTS ARE UNDULY PLACED ON COOK INLET COMMERCIAL FISHERIES WHILE KODIAK EARLY JUNE SEASON OPENINGS OCCUR WITH COUPLED CONTINUOUS OPENINGS PER WEEK IN DISTRICTS OUTSIDE THE CAPES. THE LINES NEED TO BE REDRAWN BACK TO WITHIN THE CAPES - HEADLAND TO HEADLANDS AND MANAGE ESTABLISHED TERMINAL HARVEST AREAS MORE EFFECTIVELY ON LOCAL KODIAK SALMON STOCKS.

THE G.S.I. SUB-STOCK ANALYSIS CONFIRMS THE VARIABLE RUN TIMING EFFECT ON COOK INLET STOCKS (PRIMARILY IDENTIFIED FROM KASILOF AND KENAI BOUND STOCKS) AND COMPLETELY SKEWS THE STOCK RECRUITMENT DATA / BROOD TABLES ON THESE STOCKS.

FURTHERMORE, USE OF THE SIBLING MODELS ON THESE STOCKS ARE COMPROMISED BY KODIAK INTERCEPTION AND CAUSED UNCERTAINTY IN THE FORECAST MODELS ON THESE STOCKS; E.G., KENAI SOCKEYE MANAGEMENT IS PRIMARILY BASED ON FORECASTED RUN SIZE THROUGH THE MID-POINT OF THE RUN (JULY 19<sup>TH</sup> IN-SEASON) AND RARELY CHANGED IN-SEASON OR AFTER JULY 24<sup>TH</sup> WHICH



FURTHER COMPLICATES BOTH BIOLOGICAL AND RESOURCE MANAGEMENT ISSUES IN THE COOK INLET BASIN (UPPER COOK INLET MANAGEMENT PLANS). SIMPLY PUT; 50,000 FISH AGE - 4 KASLOF SOCKEYE SALMON OR 100,000 KENAI AGE - 4 (LESS NUMBERS OF SOCKEYE WITHIN THE RETURN YEAR) CAN FORECAST LESS AGE - 5 THE FOLLOWING YEAR BY RETURNS AND PREDICT POOR RECRUITMENT / PARENT YEAR AFFECTS AS A CAUSATION EVEN THOUGH THOSE FISH WERE PLACED IN KODIAK FREEZERS AND UNACCOUNTED FOR BUT PRIMARY AFFECT WAS ATTRIBUTED TO KODIAK INTERCEPTION (G.S.I. DATA).

IN CLOSING, BASED ON "NEW INFORMATION" (G.S.I) THE BOARD SHOULD TAKE UP ACR 11 AND COMPORT KODIAK MANAGEMENT PLANS TO THE BOARD'S INTENT ON "LOCAL STOCKS" CONSISTENT WITH DIRECTIVES AND TO THE DEPARTMENT WITH CONSISTENT APPLICATION (THE STATEWIDE SALMON FISHERIES POLICY AND MIXED STOCK SALMON POLICY). THIS IS THE THIRD ATTEMPT TO THE BOARD TO ADDRESS THIS ISSUE (KODIAK MEETING, UCI BOF MEETING, AND NOW AN ACR. PLEASE CONSIDER THE ABOVE AND ACCEPT THIS ACR WITH ACTION DESCRIBED ABOVE. AFTER ALL, THE G.S.I RESEARCH OBJECTIVE WAS FOR THE BOARD TO MAKE TIMELY AND INFORMED DECISIONS. THANK YOU.

MARK DUCKER,  
VICE-PRESIDENT, ON BEHALF OF THE C.I.F.F. BOARD



October 1, 2017

Dear Alaska Department of Fish and Game Board –

Please accept this request on behalf of the F/V Taurus, Dan, Jane and Brett Veerhusen and Mark Recalma. Our family has participated in the Dutch Harbor food and bait herring fishery for over two decades. Over the past decade, our Alaska-based vessel and crew has been one of three vessels that harvest this premium bait product for the entire fishery. Yet, during this same period, we have witnessed drastic changes in the patterns of the herring, and during the 2017 season we requested the ADF&G Commissioner to issue an emergency order for our fishery. We write to the ADF&G Board to generate a proposal to task ADF&G staff to create a policy that, based on evidence provided below, changes the management of the Dutch Harbor food and bait herring fishery to account for the following:

- Change the soonest possible opening for the Dutch Harbor food and bait fishery to be July 1<sup>st</sup> – instead of the currently written regulation of July 15<sup>th</sup>
- Combine the 14% gillnet quota harvest within the 86% seine quota harvest. The current structure of rolling the gillnet quota over to the seine quota is inadequate for the current fishery and the lack of any effort from the gillnet fleet.
- Increase the GHF for the Dutch Harbor food and bait herring fishery from 7% to 10% of the allocation to the Togiak district sac roe fishery.

During the 2016 fishery, it was reported that the herring returned to the area earlier than ever before. Unbeknownst to our vessel and the two other vessels that harvest herring for various processors, we were too late to harvest much of the quota as the herring had already left the fishing grounds. This caused negative consequences not only to our fishing family's bottom-line, but greatly affected the availability of local, Alaska-caught bait that is widely used in Alaskan fisheries such as crab, cod, halibut and black cod. Fishermen throughout the state of Alaska depend on the Dutch Harbor herring fishery for premium, local, high-quality bait product. Last year, roughly 200 out of the 2,000 tonne quota was harvested, leaving fishermen and processors scrambling for other bait products, much imported from other states and countries. For example, the summer brown crab fishery was dramatically affected due to the unavailability of our Dutch Harbor herring. Moreover, we were not able to harvest additional quota purchased from the State that would have provided much needed income for the State of Alaska.

During the 2017 fishery, we received reports from Trident Seafoods in Akutan and local Dutch Harbor fishermen that the biomass of herring returned near-shore in the Dutch Harbor area. We requested (along with the Alaska Bering Sea Crabbers and Pacific Seafood Processors Association) to the ADF&G Commissioner to issue an emergency order and open the fishery on July 13<sup>th</sup>, the soonest possible date the fleet could mobilize and be on the grounds. We stopped fishing salmon in Chignik,



rushed down to Dutch Harbor and the fleet caught almost half of the herring quota in the two days early the fishery opened. In addition to these events, we've received time-stamped video footage of large schools of herring in Unalaska Bay dated June 26<sup>th</sup>, 2017. However, the current regulations state the initial purse seine herring fishing period may occur as early as noon July 15 (5 AAC 27.610(e)(2)(B)). For these reasons, we are compelled to request the regulations be changed so that the fishery can be opened as soon as July 1<sup>st</sup> of each calendar year. This is in the public's best interest to maintain a viable food and bait herring fishery for Dutch Harbor, the surrounding communities and the various fisheries who depend our bait.

As written, the *Dutch Harbor Food and Bait Herring Fishery Allocation Plan* (5 AAC 27.655) divides the allocation by gear type: 86% for the purse seine fishery and 14% for the gillnet fishery and that the gillnet quota to roll over to the seine quota should no gillnet quota be harvested by July 20<sup>th</sup>. There has been no harvest or effort by gillnetters for over a decade. The current regulations are inadequate and negatively affect the seine fishermen's efforts, as seiners must wait until this date to harvest additional quota. We request that there be no separation of gear types or quota allocations.

Because of how poor the 2016 harvest was, many of our markets relied on buying bait from other sources because of the lack of certainty the 2016 fishery created. The fleet did not harvest a couple hundred tonne of the 2017 quota because (prior to the season) many markets felt it was in their best interest to create certainty for their fishermen and sourced what would otherwise be Dutch Harbor herring from other species including saury, which is imported from Africa. These baits are not local and the State of Alaska and local communities have little to benefit from importing these bait products. The 2017 fishery allowed the fleet to rebuild our lost markets and generate continued and growing demand for the Dutch Harbor herring. Demand is also increasing for local herring from the newly created small-boat state-water Pacific Cod fishery. What better way to support a new and vibrant state-water fishery than to also support and grow a vibrant and local bait herring fishery. Moreover, a "rollover" provision was adopted during the 2001 BOF meeting (5 AAC 27.655(b)); during years when herring harvest exceeds the allocation, the amount of harvest over the allocation shall be deducted from the next year's allocation, by gear group. This provision is one-sided and there is no management structure that accounts for years of loss of harvest be available for future years, such as in 2016 and 2017. In order to grow the viability and meet market demands, we request the *Bristol Bay Herring Management Plan* (5 AAC 27.865) be adjusted from the current 7% allocation of the Togiak Districts sac roe herring harvest to the Dutch Harbor food and bait fishery to 10% allocation of the Togiak Districts sac roe herring harvest.

We are compelled to reiterate to the ADF&G Board that Article 08, Section 8.1 of the Alaska Constitution states "It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest," and Section 8.4 states "Fish,



forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses." Much of the Togiak herring fishery's harvest is shipped internationally, used for food product or fishmeal product. The Dutch Harbor food and bait herring fishery stays local and is purchased by local processors and fishermen. By moving our three requests forward, the ADF&G Board will strengthen the Board's commitment to maximizing the sustained yield and use of local bait products to be used throughout many Alaska federal and state water fisheries.

It is imperative that fishermen and processors who depend on the herring we harvest get earlier access to harvest, to combine the gillnet quota harvest within the seine quota harvest and increase the TAC of the fishery.

Thank you for your consideration.

Dan, Jane & Brett Veerhusen  
Mark Recalma

\*\*Below, please see an article published on July 21<sup>st</sup>, 2017 in the *Dutch Harbor Fisherman*. The author corrected the statement in paragraph three in a later article ([http://www.thedutchharborfisherman.com/article/1731seiners\\_leave\\_herring\\_to\\_chase\\_salmon](http://www.thedutchharborfisherman.com/article/1731seiners_leave_herring_to_chase_salmon)) noting that the earlier opening made a major difference since over 700 tonne was harvested.

[http://www.thebristolbaytimes.com/article/1729herring\\_return\\_much\\_to\\_delight\\_of\\_fishermen](http://www.thebristolbaytimes.com/article/1729herring_return_much_to_delight_of_fishermen)

**Herring return, much to delight of fishermen**  
July 21st | **Jim Paulin**

The herring have returned at a convenient time, after what seemed like a biomass boycott last year.

Last year's Dutch Harbor food and bait herring fishery was a bust, with a harvest of just 208 tons, out of a quota of 2,166 tons.

The fishermen worried that because the season opened on the same day as usual, July 15, maybe that was too late, that the herring had come and gone. So this year, they won an earlier opener by two days, on July 13, although it probably didn't make much difference.

This year, they're catching the fish at a good pace, with just 200 tons left in the 1,485 ton purse seine quota after five days of fishing, said Area Management Biologist Lisa Fox of the Alaska Department of Fish and Game in Sand Point.





The 242-ton gillnet quota becomes available to the seiners on July 20, if the gillnetters don't take it, and as of Tuesday, no gillnet boats were registered, she said.

"All of us laugh because years ago, the fleet used to complain when we needed to travel to Cape Cheerful. Now, we're fishing six or seven hours away from Dutch Harbor in unprotected waters, often heavy swell and sketchy weather. It get's pretty dicey handling a couple hundred ton and a 100-foot tender alongside," said Brett Veerhusen, who fishes with his family on the F/V Taurus, a 58-foot purse seiner. He said the F/V Taurus was one of three boats rounding up the herring, which is sold for bait to crab fishermen.

The F/V Taurus was taking a "break in the middle" from fishing salmon in Chignik, and after then it will return to the south Alaska Peninsula fishing area for more salmon, and then return to Homer, he said.

"With the herring changing their patterns, we're extremely thankful for our cooperative relationship with ADF&G in Sand Point (which manages this fishery) and the commissioner's office. The department was quick to make sure the fleet capitalized on the early return of herring. We've been doing this fishery for decades and the fish are constantly changing their behavior and migratory patterns. It's very helpful to adapt alongside decision-makers. The 2017 season is off to an excellent start and so long as the herring stay local and near the surface, we'll be able to harvest bait herring for all the other fishermen who use this high-quality, local product," he said.

Unlike in 2015, the whales haven't gotten in the way of the fishing vessels, though there's the normal amount of humpbacks which are evenly spread out, he said. This year, it's the seabird numbers that are astounding, with what looks like "hundreds of thousands of murre everywhere," Veerhusen said.



Submitted By  
Danielle Ringer  
Submitted On  
10/3/2017 5:29:06 PM  
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Danielle Ringer  
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October 2, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request and Genetic Stock Composition of Sockeye Salmon in The Kodiak Management Area

Dear Chairman Jensen and Board Members,

I am writing to vehemently oppose the UCIDA agenda change request (ACR) and its foundational arguments that will be addressed at this Work Session.

My husband is a second-generation Kodiak salmon fisherman and I grew up in a Homer fishing family. We financially borrowed heavily to get into the salmon seine fishery here in 2013 and continue to work hard each summer to weather the ups and downs of fishing. Due to barriers to entry into other fisheries, our operation and overall livelihood chiefly relies on salmon fishing in Kodiak. I work on land as a fisheries anthropologist and graduated last year from the University of Alaska Fairbanks with my Master's degree in Political Ecology of Fisheries. My graduate work focused on the "graying of the fleet" and next generation of Alaskan fishermen. My comments on this issue are therefore informed by both personal and professional perspectives on the overall sociocultural and economic importance of the Kodiak salmon fishery and the systematic analysis of the recent genetic stock composition study.

I am extremely concerned that UCIDA's ACR and foundational arguments would put our family operation out of business. Part of our strategic plan to buy into the Kodiak salmon fishery was the historic nature of it. We expect feast or famine cycles due to ecological or market changes and built some variability into our business plan. However, we cannot accommodate a loss of five weeks of fishing time as proposed by UCIDA for arbitrary and political reasons. This ACR and any foundational arguments stemming from it are inappropriate on multiple levels and have no place moving forward. In addition to having Kodiak region wide negative sociocultural and economic impacts, on a personal level I believe it could cut us out of the fishery. These closures will disproportionately impact the next generation of Kodiak fishermen and my research has documented that barriers to entry and upward mobility are already challenging enough in this region of Alaska.





This ACR clearly does not meet the Board's policy and criteria for changing the Board agenda. Furthermore, the policy states that the Board will not accept an ACR that is predominantly allocative in nature, which this ACR is. History shows the Cook Inlet region trying to reduce the viability of Kodiak's salmon fishery for its gain and this latest attempt to use the Kodiak Management Area genetic stock composition study is another example of their relentless efforts. The KMA genetic stock composition study does not present any "new information" that "corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted" nor does Cook Inlet sockeye caught in the Kodiak create a conservation concern or have conservation purpose or reason. Additionally, there is no error in regulation that needs correcting. I think it is important to address what kind of precedent accepting this ACR would set. Salmon are a complicated and valuable fishery resource, but thankfully we have a mixed stock policy to guide management throughout Alaska. Please do not set precedent with this ACR that could change how salmon are fundamentally managed statewide.

As stated above, ADF&G's genetic study of the stock composition of the commercial harvest of sockeye salmon in the KMA 2014-2016 does not provide new information to fishermen or managers, it merely provides further specifics on what stakeholders have always known. As salmon are migratory creatures their presence or absence in certain areas of the ocean environment are expected to have interannual variability and are managed as such. Though I do not wish in any way to attack the scientific method utilized in this study, it is clear that the study is highly focused at the micro level and does NOT contextualize the macro view of the complexities involved in the KMA. Furthermore, I understand that this study was not designed nor intended to be the basis for allocative changes and to use it in such a way would be inappropriate. I believe that accepting UCIDA's ACR or moving forward with any changes to the KMA plan based on their foundational arguments would result in a highly disproportional negative impact on the Kodiak region.

This ACR also simply ignores the natural variability of both Kodiak and Cook Inlet sockeye runs. Foregone harvests of local sockeye in Kodiak that would occur under this ACR proposal would cause disastrous over-escapement of Kodiak stocks. This would also put pink and Chum harvests in the KMA at risk and overall fishery closures would drastically restructure the fleet's geographical character and further disenfranchise young and new fishermen. Furthermore, UCIDA's ACR would undeniably tie the hands of Kodiak's fisheries managers by removing their tools to manage the KMA, threatening the long-term viability of the region's socioculturally and economically important salmon resource.

Commercial salmon fishing in the Kodiak region is inherently linked to cultural identity, intergenerational values and coastal fishing livelihoods. Motivations to fish among Kodiak fishermen include valuing independence and tradition, knowledge transmission and pride in harvesting wild food. Traditional and cultural values surrounding salmon fishing activities demonstrate the importance of embedded place-based fishing livelihoods. Fishing activities are also a cultural keystone practice in the Kodiak region, particularly so for Alaska Native Alutiiq people with thousands of years of ancestral ties to ocean resources. Furthermore, fishing serves as a context within our rural communities for socializing youth and newcomers to the archipelago and commercial and subsistence salmon fishing activities are also often linked, which provide for maintaining food security. The economic impact of UCIDA's ACR on Kodiak would be devastating but I hope you see that so much more is actually at stake here. I believe this ACR would severely negatively impact the sociocultural ties that hold together our unique and complex archipelago. I urge you to fully consider what this ACR is threatening for the Kodiak region.

In closing, I cannot see how the Board could accept UCIDA's ACR, as it is primarily allocative in nature and it does not meet the Board's agenda change request criteria. My family relies on the Kodiak salmon fishery as it is currently managed as we develop our fishing business and I hope that we have a future in the Kodiak region. Please do not pull the rug out from under us by severely depressing the KMA salmon fishery in an effort to appease Cook Inlet. My family, like other young Kodiak region fishermen, is working hard to move up in this industry and we look to the Board of Fisheries for support as we do so. I urge you to reject UCIDA's ACR, to see the Kodiak sockeye genetic study in context of KMA's full complexities and to let this issue follow the regular Board cycle.

Thank you for your work and deliberation on this important issue.

Sincerely,

Danielle Ringer

Fishing Family, F/V North Star

UAF Master's, Political Ecology of Fisheries





Dorey Stihl  
P. O. Box 3373  
Kodiak, AK 99615

Oct. 2<sup>nd</sup> 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Board Support Section  
P. O. Box 115526  
Juneau, AK 99811

RE: UCIDA Agenda change request  
Kodiak Management Area

Dear Board of Fish members,

I encourage you to oppose the UCIDA agenda change request. For reaching proposals with possible drastic consequences should not be rushed but given ample time for everybody impacted to assemble all the facts.

I am not aware of any changes in Kodiak's harvest of Cook Inlet Salmon that warrants an agenda change, not a correction of the existing management plan. Our salmon fishery was already restricted to 300 meshes in 1988 and we have operated under the North Shelikof Plan since then.





The noticeable difference since 1983 is a huge reduction of our fleet from around 390 boats to around 160 for 2017.

I have part-taken in Kodiak's salmon seine fishery since 1983; first as crew member and running my own operation for 31 seasons.

As committed fair weather fisherman, towing the inner bays, I have contributed my share of local catches that have counted against the cap of the Shelikof Plan.

I still fail to understand the merit of Red's caught at the terminus of minor systems, generally pulled away from outside capes, triggering the Shelikof Plan with its closures. I am aware of at least seven minor Red salmon systems within the area of the North Shelikof plan.

Studying ACR II I learn that more of the same misguided logic is prepared to mark at less the end of the Kodiak management area. For example:

East side: weekly cap 5000

5 week cap 20000

Ugok Bay produces an average of 1000 fish for that period alone





Westside: Weekly 12500  
5. Weekly 50000  
Uganuk, Telrod, Little  
River, not to mention  
Tartak, approach those  
numbers in days

This approach convinces me that  
ACR II is an unworkable and unwise  
proposal for changing a generally  
working 25-year management plan  
that has provided balance and  
stability.

So please deal with this issue  
at the proper Board Cycle in 2020

Thank you very much  
for your work and  
dedication

Denny Stahl  
T/V New Song



Attn: Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section

Dear Mr. Jensen and Board members,

I'm Darius Kasprzak, a Kodiak homeport commercial fisherman for the past 34 years. I have participated as a stakeholder for approximately 20 salmon seasons in the Kodiak area, harvesting salmon in both seine and setnet operations. The Kodiak salmon fishery is very important to me (even more so since the decline of the Gulf cod fisheries) and my colleagues and community.

I oppose the UCIDA agenda change. It doesn't meet the Board's agenda change request criteria, as the Kodiak Management Area genetic stock composition study does not present any " new information " that " corrects an effect on the fishery that was unforeseen when the regulation ( management plan) was adopted." Cook Inlet sockeye caught in the Kodiak area does not create a conservation concern. There is no error in regulation requiring correction.

The Kodiak Area Management Area genetic stock composition study was conducted during a freakishly warm water event (2014-2016) influencing the Gulf of AK, reflective of an extremely intense El Niño event coinciding with the "Blob" warm water phenomenon that occurred throughout the North Pacific during this time period.

Thusly, this study is by no means indicative of usual Cook Inlet sockeye migration behavior and patterns during average summer Gulf of AK conditions, as would be quantified by data representing multiple seasons that occur outside of extreme, and anomalous water temperature conditions.

In conclusion: for UCIDA to use a limited study taken during such abnormal conditions, as grounds to justify an Agenda Change Request, is at best frivolous.

Please deny the UCIDA agenda change request.  
Thank you for your consideration of these concerns.

Sincerely,

Darius Kasprzak

(907)654-5863  
jjgluvr@gmail.com



Darren Platt  
10708 Birch Cir  
Kodiak, AK 99615

Chairman John Jenson  
Alaska Board of Fisheries  
Board Support Section

RE: Agenda change request concerning genetic stock analysis in the Kodiak Management Area

Dear Chairman Jenson,

My name is Darren Platt and I'm a Kodiak seiner and resident. I'm writing in respectful opposition to the agenda change request, ACR 11, proposed by UCIDA. The resurrection of a longstanding allocative dispute does not satisfy any of the strict criteria in place for initiating an agenda change. Cook Inlet fishermen had an opportunity to propose allocative changes to Kodiak management during the January board meeting, and they will be provided with the same opportunity during the next cycle.

**1) Fisheries conservation purpose or reason**

There are currently no conservation concerns to justify the acceptance of ACR 11. Although UCIDA proposes that current management practices make it difficult to generate perfectly accurate brood tables, it is unclear how that equates to a critical conservation problem. Nevertheless, if we must address this argument then it should be considered that the only major Cook Inlet system that qualifies as a *stock of concern* is the Susitna (which technically isn't even a stock of conservation concern), for which ADFG has conceded that escapement "is not well known," making the creation of accurate brood tables for this particular watershed impossible. Ultimately, however, salmon fisheries are managed for sustainability and beneficent yield, not optimum brood table production.

**2) Correct an error in regulation**

Kodiak bears a considerable conservation burden by not being allowed any directed fisheries for Cook Inlet bound sockeye salmon. If it were a goal of the KMA management to optimize harvest of Cook Inlet sockeye, then Kodiak fishermen would be able to harvest much larger volumes of these fish. Unlike most conservation measures that limit harvest only during times of scarcity, Kodiak Seinners and setnetters also bear this conservation burden during times of great abundance of Cook Inlet salmon, resulting in massive volumes of foregone harvest, even when there exists no conservation concern. Similarly, the North Shelikof Strait Sockeye Management Plan, designed to further limit the harvest of Cook Inlet





bound sockeye in the KMA, is most restrictive on years of abundance when the Seaward Zones close earliest due to higher harvest rates, resulting in excessive volumes of foregone harvest by Kodiak fishermen. Our current conservation burden deprives us of fishing opportunities especially during times of abundance so that our resultant foregone harvest likely exceeds our traditional share of the fishery. Ultimately, Kodiak fishermen bear a substantial conservation burden while being deprived of much of the conservation benefits.

Ultimately, although UCIDA may be dissatisfied with Kodiak's current management plan, that dissatisfaction is not derived from errors or oversights in Kodiak's well refined management plan, which has been crafted through a deliberative process for decades and carefully accounts for our traditional and incidental harvest of Cook Inlet stocks. Although they may consider Alaska's mixed stock policy to be a mistake by allowing for harvest of non-local stocks along the entire Alaska Peninsula, this policy is in place due to the realistic nature of salmon migrations so that as a state we may adequately extract the optimum benefits from this great public resource. It should be a matter of pride that we have in place a sustainable salmon policy that has clearly allowed for the benefits of individual runs to be conveyed many hundreds of miles from the streams for many decades.

### **3) To Correct an effect on a fishery that was unforeseen when a regulation was adopted**

UCIDA is mistaken when they assume that the North Shelikof Strait Sockeye Management Plan (NSSSMP) was designed solely to "minimize the harvest of Upper Cook Inlet Salmon stocks." The first passage of the management plan directly states the purpose:

*The purpose of the North Shelikof Strait Sockeye Salmon Management Plan is to allow traditional fisheries in the area to be conducted on Kodiak Area salmon stocks, while minimizing the directed harvest of Cook Inlet sockeye salmon stocks. The board recognizes that some incidental harvest of other stocks has and will occur in this area while the seine fishery is managed for Kodiak Area salmon stocks. The board intends, however, to prevent a repetition of the non-traditional harvest pattern which occurred during 1988.*

It is critical to note that the plan is designed to minimize "directed harvest" not *all* harvest of Cook Inlet stocks. There is currently no directed harvest of Cook Inlet stocks in Kodiak. The NSSSMP was adopted to avoid a harvest pattern that occurred during 1988, that for some reason the board deemed "non-traditional," while allowing for traditional harvest of local fisheries in the area along with the inevitable incidental harvest of non-local stocks. When one considers the genetic stock analysis in the KMA, with the exception of a single, highly anomalous harvest event in 2015, the majority of Sockeye harvested in all areas and all times are of local origins. When one further accounts for the local chum, pink, and silver salmon that also constitute a large portion of the harvest, it is clear that the harvest of Cook Inlet salmon is incidental, unpredictable and inevitable. The traditional harvest of Cook Inlet sockeye in Kodiak has clearly been known for decades, and has been the subject of multiple allocative disputes between the regions.



Submitted By  
Dave Kubiak  
Submitted On  
10/3/2017 12:02:12 PM  
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Chairman John Jensen

Alaska Board of Fisheries

RE: UCIDA Agenda Change Request and Genetic Stock Composition of Sockeye Salmon in the Kodiak Management Area

I strongly oppose UCIDA's agenda change because it does not meet the Board's agenda change request criteria. There is no new information that effects Cook Inlet conservation nor is there unforeseen new information requiring changes to regulation.

I have been engaged in the Kodiak salmon fishery since the late 1960s, as setnet and seine crew and then as a permit holder, primarily in the seine fishery. Kodiak salmon seining is my primary means of income and I am dependent upon it. I have substantial investment in Kodiak salmon seining and that investment stands at risk to these unnecessary suggested changes to the Kodiak Area Management Plan.

Kodiak salmon fishing has always been a mixed stock fishery. Oceanic wind and current variabilities effect the mixes of salmon we catch. Each and every season the conditions change and so too do the mixes of fish. UCIDA's suggested management scenarios fail to take into account these seasonal and yearly variabilities and would severely impact our ability to catch our island fish, while having no credible impact on Cook Inlet sockeye return. Frankly, Cook Inlet sockeye fishermen have much bigger problems with their sockeye than the small percentages of incidental catches in the Kodiak District. While I feel their pain, shaking up the Kodiak Management Plan with these ill conceived proposals will not address the Cook Inlet's underlying problematic issues and will only cause financial hardship and disruption here.

To say it once again, UCIDA's requested agenda change does not meet Board of Fisheries required criteria. There is no error in regulation that requires correcting.

Dave Kubiak

F/V Lara Lee





David Little

P.O. Box KWP

Kodiak, AK 99697

October 3, 2017

Chair John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request and Genetic Stock Composition in the Kodiak Management Area

Dear Board of Fisheries Members,

I am a salmon set net fisherman from a remote community on Kodiak Island. For the past 35 years most of my income has come from salmon fishing. Most of my community's livelihood comes from salmon fishing. Generally I have young Alaskans, mostly from interior Alaska, who work as crew with me in my salmon operation.

Our fishery has been managed with great care since I first started fishing in 1982, and I expect the same for our future generations. The Alaska Department of Fish and Game here has managed carefully for sustainability of local stocks combined with maintaining product quality.

**To modify the board's agenda in an attempt to address mixed stock management would be "opening a can of worms" with no end in sight. There is little new information and no conservation concern.**

If we're going to approach micro-management of mixed stocks we need to do so with an overall plan for the state, while being conscious of local management consequences.

As always, thank you for your hard work and consideration of these issues.

Sincerely,

David Little  
Kodiak Island Set Net Salmon Fisherperson



## United Cook Inlet Drift Association

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43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438  
• [info@ucida.org](mailto:info@ucida.org) •

Date: September 20, 2017

Addressee: John Jensen, Chairman, AK Board of Fisheries  
AK Board of Fisheries Members  
PO Box 115526  
Juneau, AK 99811-5526

RE: ACR 11 Comments

Mr. John Jensen,

United Cook Inlet Drift Association (UCIDA) makes the following comments concerning ACR 11.

### **Introduction**

ACR 11 was submitted in order to have a regulatory review of some of the Kodiak Management Area (KMA) salmon management plans. UCIDA expects the Board of Fisheries (BOF), ADF&G, and the stakeholders in Cook Inlet, KMA and Chignik areas to have the opportunity to discuss the harvests of local and non-local salmon species within the KMA. This dialog must ultimately cover all five species of salmon, however, Sockeye and Chinook salmon require immediate attention.

Historically, average weights and scale pattern methods were used by ADF&G, the BOF and the stakeholders as a means of identifying local and non-local salmon stocks.

The Genetic Stock Identification (GSI) studies, utilizing the best science available, have provided a new level of identifying non-local stocks. GSI has also provided a new tool that improves upon previous ADF&G estimates of the natal origins of the salmon harvested in the KMA. The new GSI methodology has demonstrated that the historical average weight, tagging studies and scale pattern analyses are inadequate and misleading when determining the natal origins of salmon in KMA harvests.



In the past, the BOF has communicated a clear intent to harvest local stocks in the KMA while avoiding and minimizing the harvests of non-local salmon. Currently, rather large harvest of non-local sockeye and Chinook salmon in the KMA is generating management problems and significant economic losses in other regions of Alaska.

UCIDA requests that the BOF accept and schedule a special hearing on ACR 11 for the spring of 2018. This will provide time for all user groups, ADF&G and the BOF to review the new GSI information and KMA harvest patterns involving non-local salmon stocks.

### **Regulatory History**

The harvest of non-local stocks has been the subject of two previous out-of-cycle BOF regulatory hearings held in Kodiak. The first was in December of 1989 and the second was in March of 1995. In the 1989 BOF hearing, three significant decisions were made:

1. The intent of the BOF was to prevent any increased harvest of **Cook Inlet or other non-local stocks**. The following sections and language was added to the KMA regulations and quoted as follows:
  - A. **“5 AAC 18.363. North Shelikof Strait Sockeye Salmon Management Plan.** (a) The purpose of the North Shelikof Strait Sockeye Salmon Management Plan is to allow traditional fisheries in the area to be conducted on Kodiak Area salmon stocks, **while minimizing the directed harvest of Cook Inlet sockeye salmon stocks**. The board recognizes that some incidental harvest of other stocks has and will occur in this area while the seine fishery is managed for Kodiak Area salmon stocks. **The board intends, however, to prevent a repetition of the nontraditional harvest pattern which occurred during [1987 and] 1988.**
    - (b) From July 6 through July 25 in the Dakavak Bay, Outer Kakuk Bay, Inner Kakuk Bay, Hallo Bay, and Big River sections of the Mainland District, and in the Shuyak Island of Northwest Afognak Sections of the Afognak District, the department shall manage the fishery as follows:
      - (1) **The management of the fishery must be based on local stocks;**
      - (2) **The fishery may remain open during normal fishing periods until the harvest exceeds 15,000 sockeye salmon...**
    - (c) From July 6 through July 25 in the Southwest Afognak Section of the Afognak District, the department shall manage the fisheries as follows:
      - (1) **management of the fishery must be based of local stocks consistent with 5 AAC 18.362(d)(3);**
      - (2) **the fishery may remain open during normal fishing periods until the harvest exceeds 50,000 sockeye salmon;**



**(3) when the harvest exceeds 50,000 sockeye salmon, the commissioner shall restrict, by emergency order, the fishery to waters of the Southwest Afognak Section...**

(d) from approximately July 6 through August 15, based on pink salmon returning to the major pink salmon systems in the Southwest Afognak Section and the Northwest Kodiak District; from July 6 through July 25, the section must also be managed according to 5 AAC 18.363(c), the North Shelikof Management Plan;”

2. New harvest limits, boundaries and effective dates. There were two harvest limits of 15,000 and 50,000 sockeye established. See 5 AAC 18.363. North Shelikof Strait Sockeye Salmon Management Plan. **New boundaries** and effective dates were also established.
3. No new or expanding harvest efforts. UCIDA has purchased an archived audio file from the 1989 out-of-cycle BOF hearing held in Kodiak. In listening to these audio files, members of the BOF were concerned that by restricting the harvest of **Cook Inlet salmon stocks (harvest limits, fishing areas and effective dates) in the North Shelikof area, the seine fishery would then move to other areas of the KMA and continue harvesting non-local and Cook Inlet sockeye salmon.** These areas identified were south along the east and west sides of Kodiak Island and across Shelikof Strait to the Mainland District. Some of these areas were also previously closed as they were known interception areas.

The 1989 BOF discussions clearly stated that the new outer boundaries, harvest limits and effective dates were each to be used by ADF&G to achieve two objectives:

- a) **Minimize the directed harvest of Cook Inlet sockeye salmon stocks;**
- b) **Prevent the repetition of the non-traditional harvest pattern of [1987 and] 1988.**

In spite of this, in the ensuing years, regulatory harvest caps have been routinely exceeded, harvest boundary lines have been adjusted seaward and previously recognized interception areas have been reopened to fishing.

### **New Biological and Scientific Reports released since November 2016**

Within the last year, three ADF&G reports containing GSI information on the sockeye harvests in KMA and Cook Inlet have been published. The BOF specifically requested the Addendum that redefines (defines) the **Cook Inlet sockeyes that were harvested in the KMA for 2014, 2015 and 2016.**

1. Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016. FMS 16-10, December 2016.



2. Annual Genetic Stock Composition Estimates for the **Upper Cook Inlet Sockeye Salmon Commercial Fishery**, 2005–2016. RIR 5J17-05, July 2017.
3. Addendum to FMS 16-10: Redefinition of Reporting Groups to Separate **Cook Inlet** into Four Groups for the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016. FM No. 17-07, September 2017.

These newly applied GSI analyses are much more accurate and reliable than ADF&G’s past use of average weight and scale pattern analyses. In 2015, average weights would not have detected **Cook Inlet sockeye** in the KMA. That year all sockeye salmon across Alaska were at least a pound less than the historical average. It was the GSI work that correctly identified that there were **nearly one million Cook Inlet sockeyes** harvested in KMA in 2015. **The new GSI scientific work has reported much higher harvests of Cook Inlet sockeyes** than the older, less accurate average weight and scale pattern analyses.

In Adjustments for Cook Inlet Reporting Groups to the Addendum to FMS 16-10: Redefinition of Reporting Groups to Separate Cook Inlet into Four Groups for Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in the Kodiak Management Area, 2014-2016. (UCIDA 2017) there is GSI data specifically on the harvest of the four Cook Inlet reporting groups: Other Cook Inlet (OCI), Susitna, Kenai and Kasilof. The table below summarizes the harvests of these four reporting groups for the years 2014 through 2016. Page 13 of that report is reproduced below.

Table 11. Kodiak Management Area 2014-2016. Estimated Cook Inlet Harvests					
Reporting Group	2014	2015	2016	Total	Average
Other Cook Inlet (OCI)	11,908	80,698	49,536	142,142	47,381
Susitna	4,466	75,989	39,440	119,895	39,965
Kenai	60,973	365,335	272,160	698,468	232,823
Kasilof	36,019	103,539	22,501	162,059	54,020
<b>Total</b>	<b>113,366</b>	<b>625,561</b>	<b>383,637</b>	<b>1,122,564</b>	<b>374,188</b>
* All data taken from FMS 16-10, Shedd, et al., 2016					

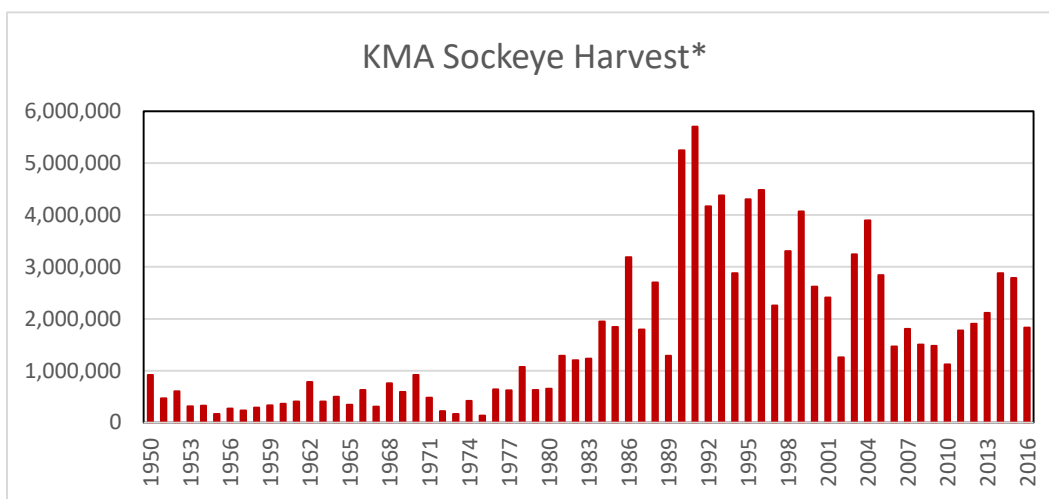
Table 11A (Adjusted for Cook Inlet). Kodiak Management Area 2014-2016. Estimated Cook Inlet Harvests					
Reporting Group	2014	2015	2016	Total	Average
Other Cook Inlet (OCI)	20,266	117,683	79,332	217,281	72,427
Susitna	8,175	105,726	64,573	178,474	59,491
Kenai	113,025	513,013	453,985	1,080,023	360,008
Kasilof	62,829	154,647	33,995	251,471	83,824
<b>Total</b>	<b>204,295</b>	<b>891,069</b>	<b>631,885</b>	<b>1,727,249</b>	<b>575,750</b>

See UCIDA, 2017, page 13 for a discussion of Tables 11 and 11A.

## Historic Kodiak Management Area Sockeye Harvests 1950-2017

Figure 1. KMA Sockeye Harvest

\*KMA sockeye data does not include the harvest of Kodiak Regional Aquaculture Association sockeye. All data from UCI and KMA 2016 Annual Management Reports



In Figure 1, the total KMA sockeye harvest is displayed from 1950 through 2016. It must be noted that from 1950 through 1978 (28 years), the KMA harvest never reached one million sockeye annually. From 1979 through 1985 (6 years), KMA did not achieve a harvest of two million sockeye annually. Beginning in 1986, most KMA sockeye harvests were above two million. Beginning in 1986, several changes occurred. First, the average size, length and width of seine vessels started increasing; second, the average length, width and horsepower of seine skiffs increased; third, seine fishing on capes and headlands increased; fourth, new fishing areas were opened; fifth, existing boundaries were expanded seaward; sixth, previously known interception areas were reopened. In 1988 there was such a large harvest of non-local stocks that in 1989 the BOF took action to prevent that from reoccurring. In 1990 and 1991, over 5 million sockeyes are harvested. In KMA during 1992, 1993, 1995, 1996 and 1999, over 4 million sockeyes were harvested. Since 2000, the KMA sockeye harvests have ranged from nearly 4 million in 2004, to about 2.4 million in 2016. Clearly, the KMA harvests of non-local sockeye salmon have seen dramatic increases since the 1989 BOF hearing. We will never know the exact numbers, but Cook Inlet and Chignik stocks have been a major contributor to these increased and non-traditional KMA sockeye harvests.



## Consequences of KMA Harvest of Cook Inlet Sockeye

### **Management**

The science of sustaining salmon stocks and sustainable salmon management relies on accurate assessment and analysis of brood tables, spawner/recruit ratios, stock production models and escapement goals. Management plans and allocations depend on decisions being made with data derived from the best available science. Clearly, the management of both KMA and Cook Inlet salmon stocks are not scientifically valid if this new GSI data is ignored.

### **Stocks of Concern**

ACR 11 gives the BOF, ADF&G and the stakeholders a new and expanded opportunity to review the Stocks of Concern (SOC) designation for certain salmon stocks. This new information should help to inform the BOF regarding the validity of some SOC designations. This GSI information could improve recovery and rebuilding plans. ACR 11 provides an opportunity to reconsider some stocks of concern and act accordingly.

Since 2008, the Susitna Sockeye Salmon Stocks have been designated as a “Stock of Yield Concern” by the BOF. At that time, the ADF&G recommended that Susitna sockeye not be declared a Stock of Yield Concern. This SOC designation was based on faulty sonar data from the Susitna River. UCIDA has never agreed with the harvest restrictions placed on the drift fleet as a result. In retrospect, the yield concern designation is a self-fulfilling prediction. The harvest restrictions based on the designation have caused reduced yields which in turn provide a positive feed-back loop that only demonstrates reduced yields. Harvest restrictions have not led to increased yields of Susitna sockeye and they never will. Now, the GSI data has revealed significant harvest of Susitna sockeye stocks in the KMA (Tables 11 and 11A). No one in ADF&G or on the BOF were aware of these large harvests of Susitna sockeye in the KMA and have not factored those harvests in the review of this SOC designation.

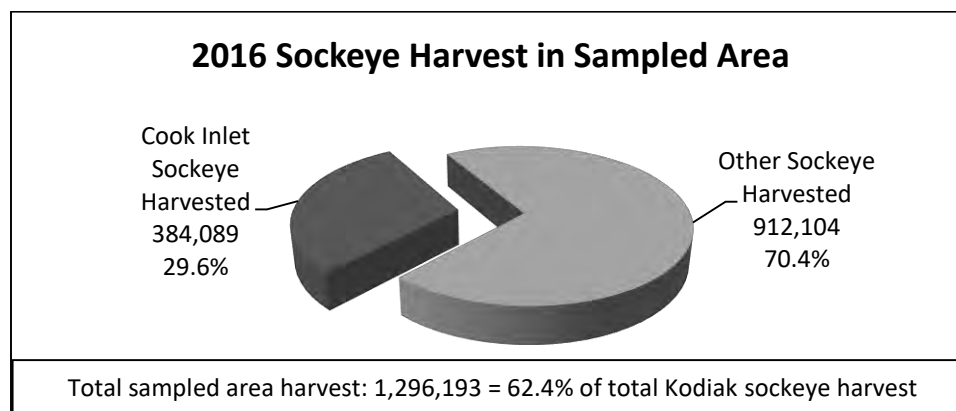
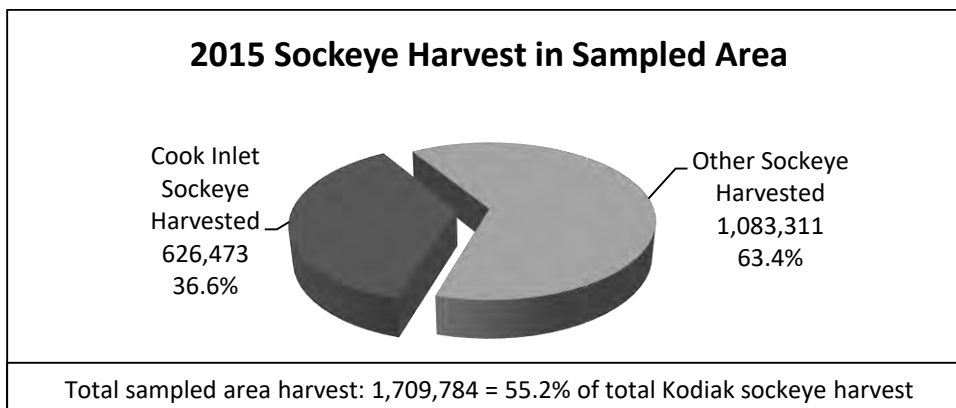
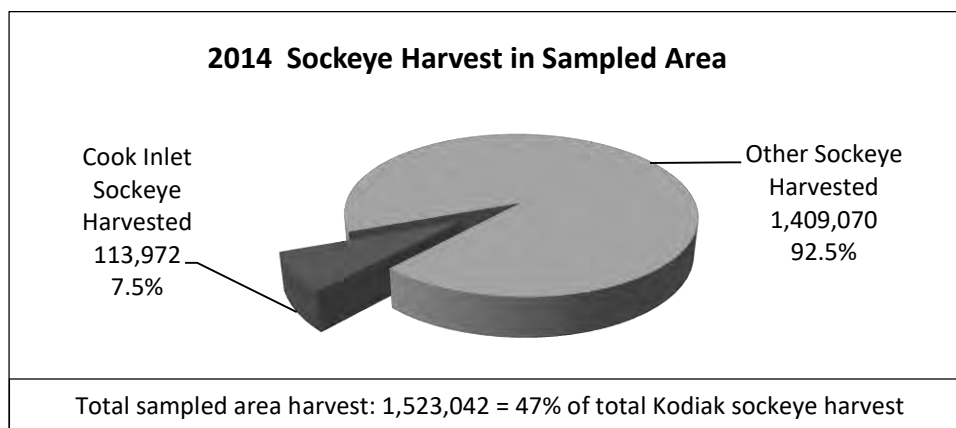
From the 2008 season through the 2017 season (10 years), the KMA has had average annual harvests range of 39,965 to 59,491, which equates to a total harvest of 399,650 to 594,910 Susitna-bound sockeye salmon. During the last 10 years, the KMA has benefitted from this harvest of nearly 400,000 to 600,000 Susitna sockeyes **without sharing any of the conservation burden.**



## Summary of the sockeye harvest data in the Kodiak genetic stock composition report\*.

Sampled area was only a portion of the entire Kodiak Management Area, see report for details.

Harvest numbers do not include catch data from previously identified intercept areas like North Shelikof and the Mainland district.



\* FMS 16-10, Shedd, et al, 2016. Page 22.





## Economics

Without question, there will be some economic issues with those that may lose and those that may gain from harvesting these salmon stocks from the area in which they originate. There is nothing new about rebalancing the economic scales. Any Cook Inlet salmon harvested in the KMA is an economic loss to the Kenai Peninsula Borough economy. However; all Kodiak salmon stocks may continue to be harvested in the KMA and it is quite unlikely that Upper Cook Inlet commercial fisheries will harvest any Kodiak salmon stocks.

**During 2014, 2015 and 2016, there were over 1,700,000 Cook Inlet sockeye salmon harvested in the KMA (Tables 11 and 11A). At an average of \$10 per sockeye, the ex-vessel value of these salmon is \$17,000,000. The first wholesale value for these salmon would be about \$34,000,000 and the economic value to the Kenai Peninsula Borough economy would be 3-5 times that value.** However; for the 2014, 2015 and 2016 salmon seasons, Cook Inlet Drift Fishermen averaged about \$20,000 for the entire season, some of our worst years ever, (CFEC Report No. 16-5N, page 31, reproduced on page 9). The loss to Cook Inlet commercial fisheries, the seafood processors and our entire economy is unacceptable. ACR 11 provides an opportunity to readjust the economic balance.



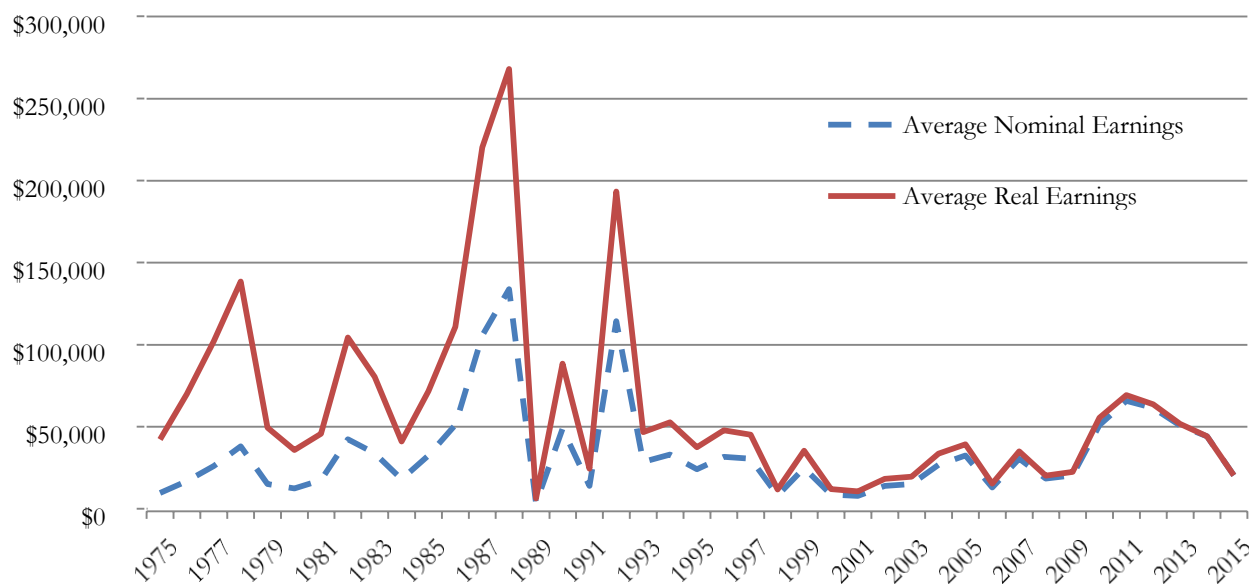
## Participation and Earnings

**Figure 9**

CFEC reports the nominal and average gross earnings per Cook Inlet Salmon Drift Gillnet Permits from 1975-2015. In 2015, the drift gillnet permit average was \$21,542.00. Cook Inlet Drift CFEC 16-5N, July 2106.

Table 29 reports the number of permits, permits and vessels with landings, and estimated gross earnings in the Cook Inlet salmon drift gillnet fishery from 1975 to 2015. Note that the figures by permit or vessel in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

**Figure 9. Estimated Nominal and Real Average Gross Earnings Per Cook Inlet Salmon Drift Gillnet Permit**



- Real earnings are adjusted for inflation using the 2015 U.S. Bureau of Labor Statistics Consumer Price Index.



**Table 29. Estimated Total Gross Earnings (Real and Nominal) for the Cook Inlet Salmon Drift Gillnet Fishery, With Average Gross (Real) Earnings by Permit and Vessel, 1975-2015**

Year	Viable Permits	Gross Earnings		Permits With Landings	Average Real Earnings	Vessels With Landings	Average Real Vessel Earnings
		Nominal	Real				
1975	636	\$4,461,123	\$19,653,571	466	\$42,175	534	\$36,804
1976	584	\$8,569,607	\$35,696,704	511	\$69,857	563	\$63,404
1977	572	\$13,853,810	\$54,184,629	531	\$102,043	685	\$79,102
1978	589	\$22,033,557	\$80,097,048	578	\$138,576	605	\$132,392
1979	599	\$8,954,115	\$29,232,473	592	\$49,379	622	\$46,998
1980	598	\$6,894,765	\$19,832,239	553	\$35,863	578	\$34,312
1981	599	\$10,227,361	\$26,667,310	584	\$45,663	605	\$44,078
1982	592	\$24,514,672	\$60,211,337	577	\$104,352	588	\$102,400
1983	588	\$19,592,016	\$46,622,900	580	\$80,384	598	\$77,965
1984	588	\$10,381,576	\$23,682,484	578	\$40,973	609	\$38,887
1985	591	\$18,975,346	\$41,798,138	584	\$71,572	684	\$61,108
1986	588	\$29,948,905	\$64,766,420	584	\$110,901	658	\$98,429
1987	586	\$61,784,789	\$128,908,849	585	\$220,357	652	\$197,713
1988	585	\$78,128,882	\$156,533,164	584	\$268,036	657	\$238,254
1989	585	\$33,363	\$63,770	10	\$6,377	10	\$6,377
1990	585	\$28,384,895	\$51,474,390	582	\$88,444	625	\$82,359
1991	584	\$8,099,133	\$14,094,216	578	\$24,384	615	\$22,917
1992	583	\$66,362,059	\$112,109,310	580	\$193,292	642	\$174,625
1993	583	\$16,537,133	\$27,125,132	580	\$46,767	632	\$42,920
1994	583	\$18,766,136	\$30,012,775	569	\$52,747	565	\$53,120
1995	582	\$13,912,083	\$21,636,484	577	\$37,498	583	\$37,112
1996	583	\$17,736,374	\$26,793,003	560	\$47,845	563	\$47,590
1997	581	\$17,448,194	\$25,766,470	572	\$45,046	575	\$44,811
1998	581	\$4,303,378	\$6,257,508	528	\$11,851	527	\$11,874
1999	576	\$12,134,809	\$17,263,841	487	\$35,449	487	\$35,449
2000	576	\$4,438,593	\$6,109,303	513	\$11,909	510	\$11,979
2001	574	\$3,711,269	\$4,966,877	467	\$10,636	466	\$10,659
2002	572	\$5,686,049	\$7,491,330	409	\$18,316	409	\$18,316
2003	572	\$6,329,162	\$8,152,820	418	\$19,504	412	\$19,788
2004	571	\$11,798,178	\$14,803,434	440	\$33,644	435	\$34,031
2005	571	\$15,251,702	\$18,509,538	471	\$39,298	468	\$39,550
2006	570	\$5,159,160	\$6,065,519	396	\$15,317	396	\$15,317
2007	571	\$12,759,634	\$14,585,806	417	\$34,978	415	\$35,147
2008	571	\$7,823,008	\$8,611,983	433	\$19,889	415	\$20,752
2009	570	\$8,202,181	\$9,061,637	416	\$21,783	388	\$23,355
2010	569	\$19,300,530	\$20,978,803	411	\$51,043	353	\$59,430
2011	569	\$30,378,044	\$32,009,179	493	\$64,927	426	\$75,139
2012	569	\$30,546,478	\$31,534,075	525	\$60,065	460	\$68,552
2013	569	\$25,230,345	\$25,670,063	538	\$47,714	473	\$54,271
2014	569	\$21,897,315	\$21,923,306	530	\$41,365	483	\$45,390
2015	569	\$10,060,160	\$10,060,160	518	\$19,421	467	\$21,542

- Adjusted for inflation to 2015 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year; figures will also differ where dual permit operations were used and landings were solely recorded on one of the two permits.
- The 1989 fishing season was cut short due to the Exxon Valdez oil spill that occurred that year.



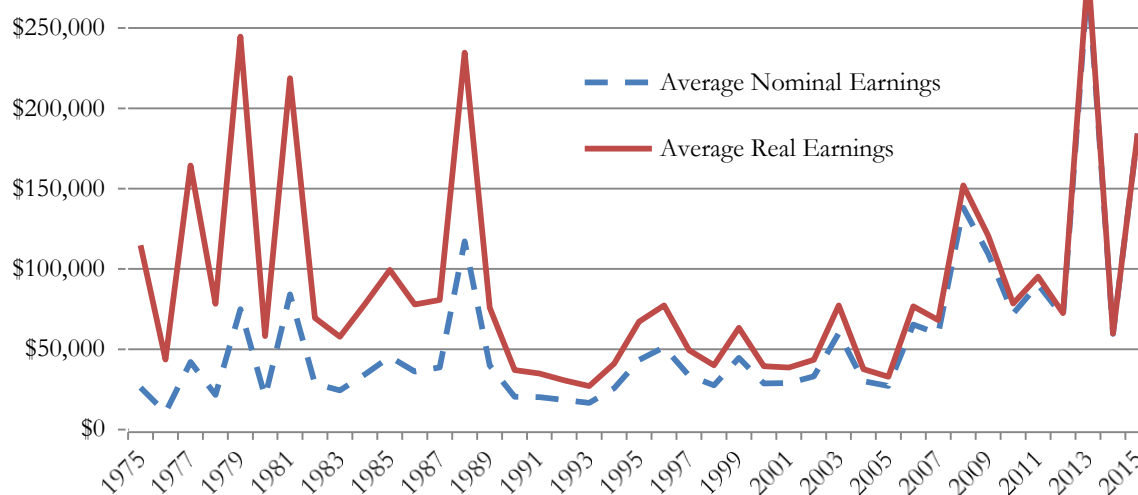
## Participation and Earnings

**Figure 4**

CFEC reports the nominal and average gross earnings per Kodiak Purse Seine Fishery from 1975-2015. The 2015 average purse seine fishery vessel was \$182,326.00

Table 13 reports the number of permits, permits and vessels with landings, and estimated gross earnings in the Cook Inlet salmon purse seine fishery from 1975 to 2015. Note that the figures by permit in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

**Figure 4. Estimated Nominal and Real Average Gross Earnings Per Cook Inlet Salmon Purse Seine Permit**



- Real earnings are adjusted for inflation using the 2015 U.S. Bureau of Labor Statistics Consumer Price Index.

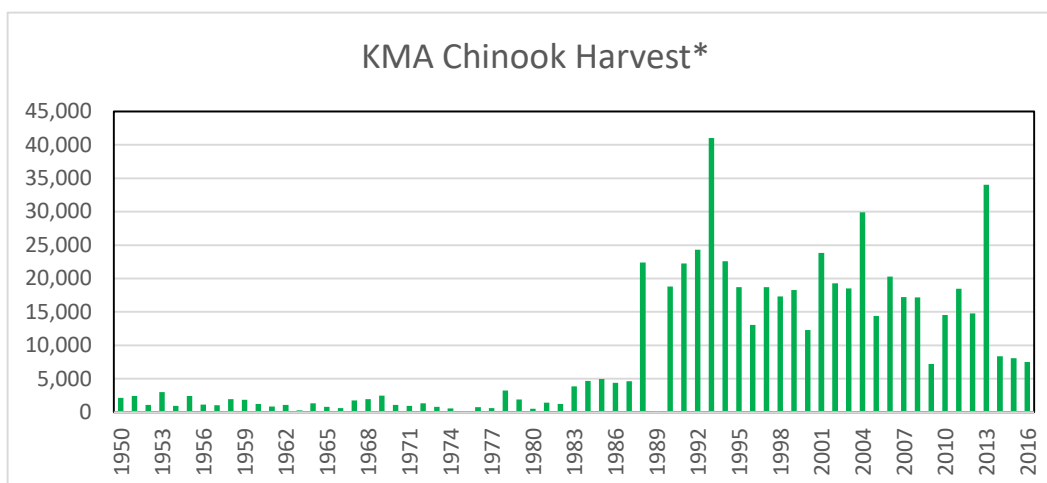


**Table 13. Estimated Total Gross Earnings (Real and Nominal) for the Cook Inlet Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2015**

Year	Viable Permits	Gross Earnings		Permits With Landings	Average Real Earnings	Vessels With Landings	Average Real Vessel Earnings
		Nominal	Real				
1975	89	\$1,406,224	\$6,195,147	54	\$114,725	60	\$103,252
1976	78	\$513,502	\$2,138,994	49	\$43,653	56	\$38,196
1977	82	\$2,563,292	\$10,025,476	61	\$164,352	71	\$141,204
1978	83	\$1,419,533	\$5,160,330	66	\$78,187	66	\$78,187
1979	84	\$5,769,152	\$18,834,533	77	\$244,604	81	\$232,525
1980	84	\$1,434,609	\$4,126,539	71	\$58,120	71	\$58,120
1981	85	\$6,882,516	\$17,945,801	82	\$218,851	87	\$206,274
1982	84	\$1,784,216	\$4,382,275	63	\$69,560	62	\$70,682
1983	83	\$1,720,680	\$4,094,682	71	\$57,672	73	\$56,092
1984	81	\$1,847,067	\$4,213,535	54	\$78,028	56	\$75,242
1985	82	\$2,302,420	\$5,071,678	51	\$99,445	50	\$101,434
1986	83	\$2,196,680	\$4,750,461	61	\$77,876	61	\$77,876
1987	83	\$2,591,820	\$5,407,618	67	\$80,711	68	\$79,524
1988	83	\$8,437,869	\$16,905,481	72	\$234,798	75	\$225,406
1989	83	\$2,539,823	\$4,854,687	64	\$75,854	66	\$73,556
1990	83	\$1,444,426	\$2,619,383	71	\$36,893	73	\$35,882
1991	83	\$1,360,809	\$2,368,097	68	\$34,825	74	\$32,001
1992	83	\$1,107,528	\$1,871,012	61	\$30,672	61	\$30,672
1993	84	\$842,496	\$1,381,909	51	\$27,096	54	\$25,591
1994	84	\$768,850	\$1,229,626	30	\$40,988	31	\$39,665
1995	84	\$1,982,432	\$3,083,136	46	\$67,025	45	\$68,514
1996	85	\$1,740,062	\$2,628,580	34	\$77,311	37	\$71,043
1997	85	\$768,043	\$1,134,201	23	\$49,313	24	\$47,258
1998	83	\$1,069,729	\$1,555,485	39	\$39,884	44	\$35,352
1999	83	\$1,912,728	\$2,721,183	43	\$63,283	43	\$63,283
2000	83	\$1,029,272	\$1,416,695	36	\$39,353	37	\$38,289
2001	83	\$721,111	\$965,080	25	\$38,603	31	\$31,132
2002	82	\$823,726	\$1,085,253	25	\$43,410	24	\$45,219
2003	81	\$1,558,569	\$2,007,649	26	\$77,217	30	\$66,922
2004	81	\$719,238	\$902,444	24	\$37,602	27	\$33,424
2005	82	\$786,252	\$954,200	29	\$32,903	33	\$28,915
2006	82	\$1,564,895	\$1,839,815	24	\$76,659	24	\$76,659
2007	83	\$1,131,535	\$1,293,482	19	\$68,078	18	\$71,860
2008	82	\$3,451,830	\$3,799,958	25	\$151,998	23	\$165,216
2009	82	\$1,420,257	\$1,569,077	13	\$120,698	12	\$130,756
2010	82	\$1,010,051	\$1,097,879	14	\$78,420	16	\$68,617
2011	83	\$2,076,973	\$2,188,495	23	\$95,152	20	\$109,425
2012	83	\$1,123,214	\$1,159,529	16	\$72,471	17	\$68,208
2013	83	\$3,374,183	\$3,432,988	12	\$286,082	13	\$264,076
2014	84	\$1,191,240	\$1,192,654	20	\$59,633	20	\$59,633
2015	84	\$3,500,945	\$3,500,945	19	\$184,260	18	\$194,497

- Adjusted for inflation to 2015 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.

Figure 2. KMA Chinook Harvest



\*All data from UCI and KMA 2016 Annual Management Reports

### **KMA Chinook Harvests**

In Figure 2, the KMA annual Chinook harvests are displayed from 1950 through 2017. As you examine the annual Chinook harvests from 1950 through 1983 (33 years), there were less than 2,000 Chinook harvested annually throughout the KMA. In the KMA, there are only two Chinook salmon systems with escapement goals: the Karluk escapement goal of 3,000 – 6,000, and Ayakulik escapement goal of 4,000 – 7,000. Beginning in 1984 and continuing for the next 30 years until 2013, Chinook harvests increased dramatically. In 1993 over 42,000 Chinook were harvested in the KMA. The December 2016 Escapement Goal Report for Kodiak by Shaberg, et al., Appendix A2 (page 37), indicates the 1993 commercial harvest from the Ayakulik system was 2,708 Chinook. Appendix B2, (page 45) indicates that the 1993 harvest from the Karluk system was 3,082 Chinook. Taken together, Ayakulik and Karluk total 5,790 commercially harvested Chinook salmon. Yet in 1993, there were over 42,000 Chinook commercially harvested in Kodiak, more than 36,000 are from other areas. Since 1984, these harvests of non-local Chinook have been repeated year after year.

This increased harvest of Chinook occurs at the same time as sockeye harvests increased. These increased harvests occurred simultaneously with the increased length and width of the seine vessels, the fishing on capes and headlands, the opening of increased fishing areas, the reopening of previously closed fishing areas, the extensive use of Emergency Order



authority to facilitate fishing 24 hours a day, 7 days a week for much of June, July and August. There is simply no biological possibility that the Karluk and Ayakulik systems can produce a harvest of over 42,000 Chinook, plus meet escapement needs, for a total run of over 50,000. **This inescapable reality is that most of the Chinook harvested in the KMA since 1984 are non-local stocks.**

After the 2012 season the BOF adopted **5 AAC 18.395. Retention of King Salmon taken in a commercial fishery.** This regulation states that King (Chinook) salmon 28 inches, or greater, in length taken incidentally must be returned to the water unharmed. This regulation has likely had no effect on the number of chinook caught in the KMA commercial fishery but appears to have reduced the reported harvest of Chinook salmon (See Figure 2, years 2014, 2015 and 2016). In 2017, the harvest of Chinook salmon in the KMA was about 6,500. From 2014 through 2016, a genetic stock identification research project was conducted. The purpose of this study was to use GSI tests to determine, if possible, the natal origins for Chinook harvested in the KMA. The results are reported by Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016 (Shedd, et al., December 2016).

There are three very important issues that must be placed in the public record regarding 5 AAC 18.395 and the Chinook Genetic Stock Identification study for the 2014-2016 time period.

1. First, the genetic samples were taken on tendering vessels or at the processing facilities. Genetic sampling did not occur at the time or point of harvest or capture.
2. Second, because of 5 AAC 18.395, all Chinook 28 inches or greater in length were never sampled. There is no information on: **how many** Chinook 28 inches or greater were incidentally caught and released; **when** these Chinook 28 inches or greater were incidentally caught and released; **where** these Chinook 28 inches or greater were caught and released, or the **mortality rate** of these Chinook 28 inches or greater that were incidentally caught and released.
3. Third, the reported natal origins (Shedd, et al., 2016) are only for the harvests of Chinook 28 inches or less.

This GSI determination has accurate natal determinations and assignments. The Shedd, et al., 2016 report makes no determinations, findings or conclusions on the Chinook 28 inches or greater that were incidentally caught and required to be released by regulation. Cook Inlet has numerous streams that Chinook return to and over 200,000 Chinook return there annually to spawn. Chinook salmon 28 inches or greater are often mature or are in pre-spawn developmental stages.





The effect that the harvest, capture and release of Chinook greater than 28 inches has on Cook Inlet and other areas of the state is an issue that ACR 11 addresses through the institution of harvest limits by week and by year. ACR 11 provides an opportunity to examine, discuss and resolve the Chinook harvesting issues in the KMA.

### **Policy Issues and Inconsistencies**

ACR 11 provides a proposal to adjust regulatory management plans. There are several existing regulatory policies that should be applied to the KMA salmon management plans and harvests of non-local stocks. These are:

1. 5 AAC 39.222. Policy for the management of sustainable salmon fisheries.
2. 5 AAC 39.200. Application of fishery management plans.
3. 5 AAC 39.220. Policy for the management of mixed stock salmon fisheries.
4. 5 AAC 39.223. Policy for statewide salmon escapement goals.

The KMA management plans have numerous variances when compared to the above statewide policies. There are numerous instances where these referenced policies are not being followed, even ignored, and in some instances, misapplied. ACR 11 allows the BOF, ADF&G and the stakeholders to reexamine and adjust management plans and regulations.

### **Conclusion**

Clearly, GSI has improved overall understanding about sockeye and Chinook salmon. Hopefully, future GSI projects will continue to improve our biological understanding on all species of salmon.

The BOF and ADF&G should, as a matter of public policy, incorporate the new and improved GSI biological information into their regulatory decisions and daily management. The BOF now has the opportunity to incorporate the new science into the regulatory process by scheduling ACR 11 for a regulatory hearing.

The Cook Inlet fishing community understands, but does not agree with the regulatory road and the new challenges ahead for many regions and communities. UCIDA asks that ACR 11 or something similar be scheduled for a regulatory hearing by the BOF before the 2018 salmon season. UCIDA further commits its resources and time to problem solving discussions. We



would hope that these discussions could occur in a timely fashion, prior to the 2018 salmon season.

Sincerely,

*Original Signed Document*

David Martin, President  
United Cook Inlet Drift Association

cc:

Governor Bill Walker  
Senate Resources Committee Members  
House Fisheries Committee Members  
Senator Majority Leader Peter Micciche  
Senator Gary Stevens  
House Speaker Bryce Edgmon  
Representative Gary Knopp  
Representative Paul Seaton  
Kenai Peninsula Borough Mayor Mike Navarre  
Kodiak Borough Mayor Dan Rohrer  
Mat-Su Borough Mayor Vern Halter  
City of Kenai Mayor Brian Gabriel



DJ Vinberg  
3609 Sunset Drive, Kodiak AK 99615  
PO Box 9032, Kodiak, AK 99615  
F/V Family Pride  
tel: 907-539-2667; email: fpride@Alaskan.com  
October 1, 2017

Dear Chairman Jensen and Members of the Alaska Board of Fisheries,

I respectfully submit my opposition to ACR 11, and ask that you reject it outright.

It is widely accepted that the Kodiak salmon fishery is one of the most well-managed, complex, multidimensional and diversified salmon fisheries in Alaska. The management structure that is suggested in ACR 11 is unjustified, unnecessary and unrealistic. It would impose draconian impacts to the economics, profitability, operations, participation, tradition, diversity, fishing behavior and rationality of our current Kodiak salmon management regime. A management plan that caps the weekly and seasonal commercial sockeye salmon harvest in major areas of the Kodiak Management Area over the lengthy time frame that is suggested is simplistic, and makes little sense.

The philosophy of ACR 11 disrupts the ability of ADF&G to manage the fishery to the precision that currently exists. ACR 11 would impose unnecessary, and significant costs on the Kodiak seine and set net harvesters and their crews, on the quality of salmon delivered to the consumer, on the processing companies, processing workers, and transportation businesses, and be responsible for myriad other negative consequences. Our loss would be significant, and would not be offset by any measurable gain in Cook Inlet. The cost/benefit ratio is very unreasonable for Kodiak stocks, industry and community economics, product quality, and management efficiency and performance.

I own a 58' vessel that I operate with 4 other crew. I am 55 years old, and have a family. I began salmon fishing with my dad when I was 4 years old. Dad fished for 50 years. I have been fishing for 50 years, and running a vessel for 30 years. Our operation, and many others in Kodiak of similar size and operational pattern, need volume. The Kodiak economy does not provide many other opportunities for the crew and their families, and they are very dependent on our success. Dad mostly fished for salmon in Kodiak, contributed to the development of the Kodiak salmon fishery, and actively participated in the development of the Kodiak salmon management regime. He was one of the early advocates of the Kodiak Regional Aquaculture Association, and served as one of the founding members of the KRAA Board of Directors. He taught me enough to conclude that ACR 11 is not rational, reasonable or necessary, and that the Kodiak and Cook Inlet fisheries, and the natural environment that impacts these fisheries, are so variable that a



management plan such as is recommended in ACR 11 is neither workable, reasonable or valid.

I believe that several important and vibrant Kodiak salmon producing systems are likely to experience overescapement if the ACR 11-recommended management regime, or some likeness of such, were ever to be implemented. I believe that you have the responsibility to carefully and scientifically study, consider and clearly understand the detrimental impacts to salmon productivity that will certainly result in many important Kodiak systems. Karluk, a system of major importance, is a perfect example where overescapement would be detrimental to the productivity of this system. The managers are likely to tell you that overescapement is as big a problem as underescapement.

Kodiak, by virtue of its location, is bound to occasionally receive outside migrating non-local salmon. But you must understand that this occurs on an intermittent and variable basis. The vast majority of our sockeye catch is of local origin. The idea of managing our stocks based on outside stocks is opening pandora's box, and is a major policy issue. If you act to make an example of Kodiak, and begin to micromanage on any scale that approaches the scale that is recommended in ACR 11, you, or those Board members who follow you, will have to eventually introduce that philosophy across the whole state.

Do you plan to micromanage Area M based on the Bristol Bay return, or shutting down the outside areas of Chignik based on their regular interception of Bristol Bay, Kodiak and Cook Inlet sockeye and other species in those outside areas? Are you planning on putting caps on the Chignik harvest of Kodiak pink salmon based on their impacts to Kodiak pink salmon catch and escapement?

How will Chignik's harvest of their own sockeye stocks be impacted when you begin to adjust their sockeye harvest in the outside areas based on the objective of moderating the impacts of their harvest to Kodiak pink salmon and Upper Cook Inlet harvest and escapement?

I respectfully request that you do not adopt or accept any part of ACR 11. The underlying philosophy of this initiative is not plausible. I ask you to reject ACR 11 outright. Please do not carry over any part of ACR 11 to the discussion of the agenda items that are scheduled for consideration on Thursday, October 19. And please leave further consideration of Kodiak salmon management matters to the three-year cycle. Thank you.

Sincerely,

DJ Vinberg



Donald Lawhead Jr  
3915 E Blue Sapphire Ct  
Wasilla ,Ak 99654  
9/28/17

Chairman John Jensen  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau ,Ak 99811-5526

RE: UCIDA Agenda Change Request

I oppose the request by UCIDA for agenda change. There is no biological reason for this request. Cook Inlet sockeye stocks have meet or exceeded escapement goals. The request wants to create a whole new management plan for Kodiak based on genetics from only three sampling years and one year with almost no Cook Inlet fish being present. The request includes areas that had no samples of genetics or research. The economic cost for the community of Kodiak would be devastating. Reduced fishing time results in work loss for fisherman, processors, processing workers, Kodiak businesses and revenue for the city of Kodiak.  
Thanks,

Donald Lawhead Jr  
Kodiak salmon fisherman  
Since 1992  
Sent from my iPad



Duncan Fields  
P.O. Box 25  
Kodiak, AK 99615

October 3, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request #11 and the study of  
the Genetic Stock Composition of Sockeye Salmon in the  
Kodiak Management Area

Dear Chairman Jensen and Board Members:

My family and I have fished at the same setnet sites on Bear Island and Harvester Island in Uyak Bay on the west side of Kodiak Island for the past 57 seasons. Without question, the adoption of the RC #11 would put us out of business--- this is not advocacy or hyperbole. Clear water, open ocean setnetting like what occurs on the west side of Kodiak requires fishing time to be profitable. We're not in proximity to the stream terminus where fish school and we often experience weather days and slack fishing. Closing each of 5 weeks to our setnets would allow significant local stocks to pass our nets. We can't move to capture these fish elsewhere and this amount loss would be more than our profit margins.

As you are aware I've been working with the Kodiak Salmon Work Group and through the groups presentations have outlined many of the substantive arguments regarding why the Board of Fisheries should wait until the January 2020 meeting in Kodiak to address this issue. As I was writing the current Kodiak Salmon Work Group comments I was reminded of testimony I prepared for the Board in November of 1995. At that time, the Board allowed each side to provide a 15-minute presentation of the issue from their perspective at the start of public testimony.

I've read hundreds of pages of documents regarding the past iteration of the Kodiak/Cook Inlet issue that ran from 1989-1996. However, and I have a bias I know, I think the attached presentation from November 1995 is the most concise summary of the information and conclusions reached after 6 years of Board meetings, proposals and work groups. In short, if you are interested in reading one document regarding what happened before the Board the last time this issue was addressed, this is the document.

Very truly yours,  
Duncan Fields



# **Kodiak Salmon Work Group Report**

**for submission to**

**The State of Alaska Board of Fisheries**

**convening**

**November 29-December 6, 1995**

**Kodiak, Alaska**

**Issues and comments regarding the  
Kodiak/Cook Inlet Commercial Salmon Proposals**





# Kodiak Salmon Workgroup

## 11/29/95

Mr. Chairman, Board of Fish members, my name is Duncan Fields, I have commercial fished in the Kodiak Management Area for the past 35 years. My family and I operate a "set net" operation in Uyak Bay on the west side of Kodiak Island. As you know from my presentations to you last winter, I am a member of the Kodiak Salmon Task Force and one of Kodiak's representatives on the Kodiak\Cook Inlet inter-area work group that was formed by the Board last year.

I'm here today as spokesperson for the Kodiak Salmon Task Force to persuade you to reject the various proposals seeking to manage the Kodiak salmon fishery for non-local stocks. I will make my case by giving an overview of the issue -- as much as time permits -- from Kodiak's perspective. Your chairman, Mr. Engel, thought it would be helpful for Kodiak and Cook Inlet to present an overview of the issue to help tie together various arguments and thoughts presented in the limited time allocated to individual public testifiers. Hopefully, this will enable the Board to see the issue from a more cohesive perspective.

Much of what I say today will be similar to what I presented last March.



Perhaps I can refresh your memories as to the issues that were clarified at that time. I will also address the 1995 Kodiak season as well as the 5 Cook Inlet proposals currently before the Board. In addition I will outline the Ouzinkie Native Corporation's proposal related to the North Shelikof Management plan.

Before I start my presentation Kodiak would like to thank the Board for your review of this issue over the past 3 years. We would particularly like to thank Mr. Engel and Mr. Edfelt for their involvement in the inner-area work group. Thank You!

I'd like to direct your attention to three documents..... The first is the Book we presented to the Board last year. Although this is unchanged, it is still an encyclopedia of the Cook Inlet bycatch issue up through 1994 --- we simply didn't have time, after the staff reports were completed three weeks ago, to update the book. I trust our book will be helpful as a reference volume as you deliberate on the bycatch issue. The second is a volume created for the March 1994 Board meeting with letters, affidavits and correspondence regarding this issue. This volume reflects the entire community of Kodiak's -- fishermen, processors, crewmen, citizens and businesses --- concern about non-local stock management of the Kodiak salmon fishery. The thesis of both volumes is that Kodiak's fisheries should be managed as it is now managed, on the abundance of local stocks. The third document is the ring bound packet you should have received today. It includes the text of my presentation as well as specific



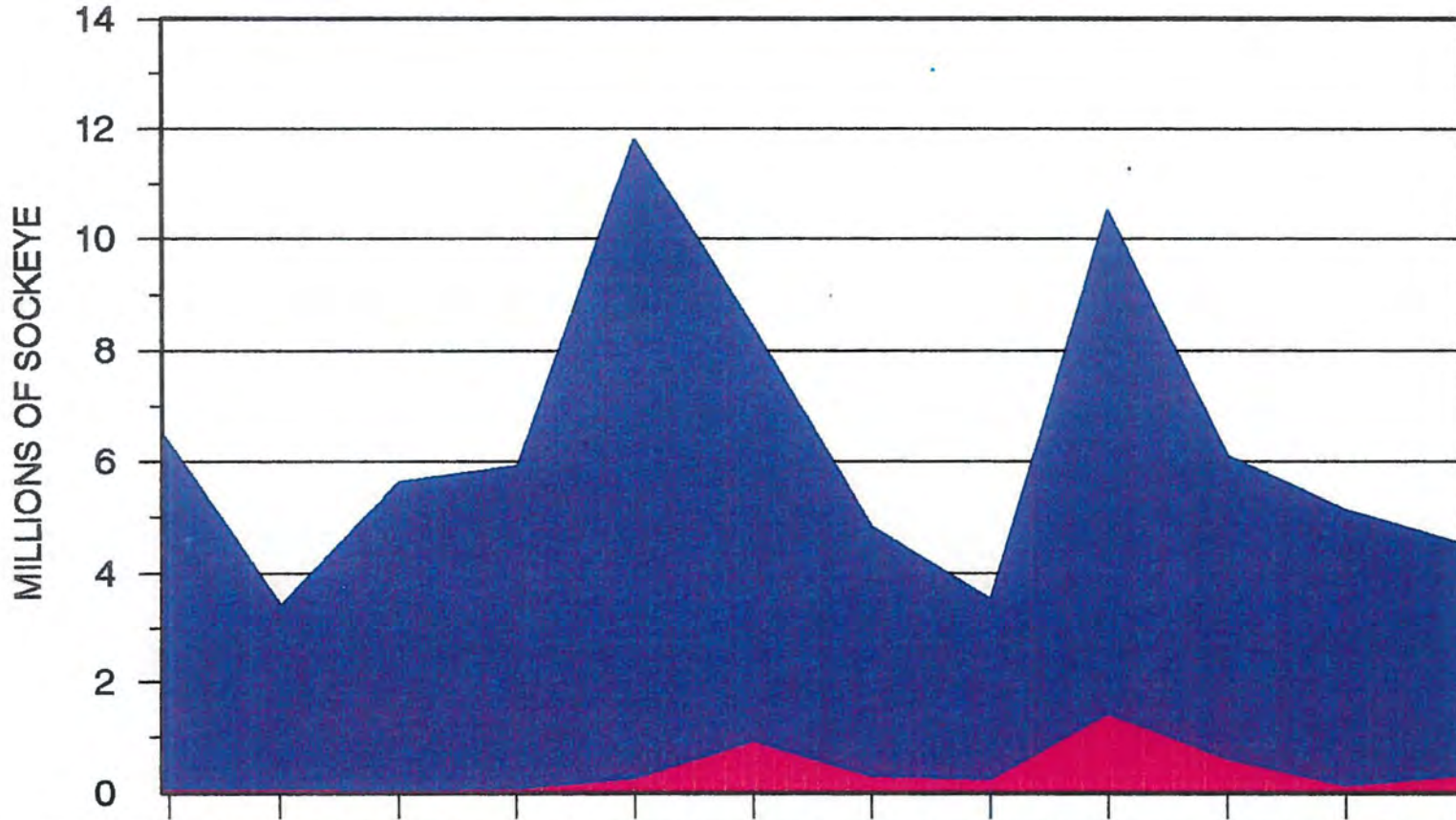
comments about the Cook Inlet Proposals.

Defining the issue:

Fundamentally -- at its heart-- the Cook Inlet bycatch issue is a difference in perspective regarding the Kodiak salmon fishery. The Board is confronted with two thesis statements. Cook Inlet claims that Kodiak has a new and expanding fishery targeting Cook Inlet sockeye, a fishery that must be stopped. Or, the Kodiak thesis, Kodiak's incidental catch of Cook Inlet sockeye is primarily dependant on the size of Cook Inlet runs and under current board policy does not need additional regulation. Cook Inlet sees a Kodiak fleet with expanding catch capability and ever increasing knowledge moving to various capes intent on capturing Cook Inlet fish. In other words, Cook Inlet defines the problem as a Kodiak problem and Kodiak defines the issue in terms of what has happened with salmon returns in Cook Inlet.

The Kodiak thesis is best illustrated by our so called "Twin Peaks" chart. As the size of the Cook Inlet sockeye runs have increased, so too has the Kodiak bycatch of sockeye. Note particularly the large Cook Inlet runs in 1988 and 1992, you will see that these were years when Kodiak's bycatch also increased. If the Kodiak fishery were expanding, with more knowledge about how to target Cook Inlet fish and better equipment to fish new capes, you would expect the bycatch rates to remain fairly high or show an increasing trend. This is not the

# UPPER COOK INLET TOTAL RUN KODIAK AREA INCIDENTAL CATCH



YEAR	1983	1984	1985	1986	1987	1988	1990	1991	1992	1993	1994	1995
U.C.I. RUN	6.5	3.4	5.6	5.9	11.8	8.4	4.8	3.5	10.5	6.1	5.1	4.5
INCIDENTAL CATCH	.082	.075	.051	.076	.267	.927	.303	.252	1.441	.625	.130	.327*

\*\*\* KSWG estimate based on 1990,91,93,& 94 numbers.







case.

Just a quick note about the Kodiak Salmon Work Group's 1995 bycatch number. You have heard the staff indicate that an actual weight comparison has not been completed. Our bycatch number is an estimate -- nothing more. The estimate is based on the average from the 4 most recent years with Cook inlet runs similar in size to their 1995 return --- years 1990, 1991, 1993 and 1994. In three of these 4 years the Cook Inlet run was larger than the 1995 return so we would expect our estimate to be on the high side. Nevertheless, we wanted to give the board some sense of possible bycatch magnitude for the 1995 season.

You will observe that the line for Kodiak bycatch is slightly up on the Mountains and Valleys chart in 1995 --- again this is a "guesstimate". The upturned trend is just what you would expect in a year with maximum harvest opportunities on local Kodiak stocks. Much of the Kodiak Management Area was open to fishing in excess of 90 days during the 1995 season--- my own fishing operation, for example, had nets in the water 95 days and for 64 continuous days starting during the mid July cap period. What is surprising is that with the huge amount of fishing time in Kodiak, the incidental catch of non-local fish wasn't more noticeable. Non-local fish just weren't available, in any abundance, to Kodiak fishermen in 1995.

The second chart to confirm the Kodiak thesis of a density dependant

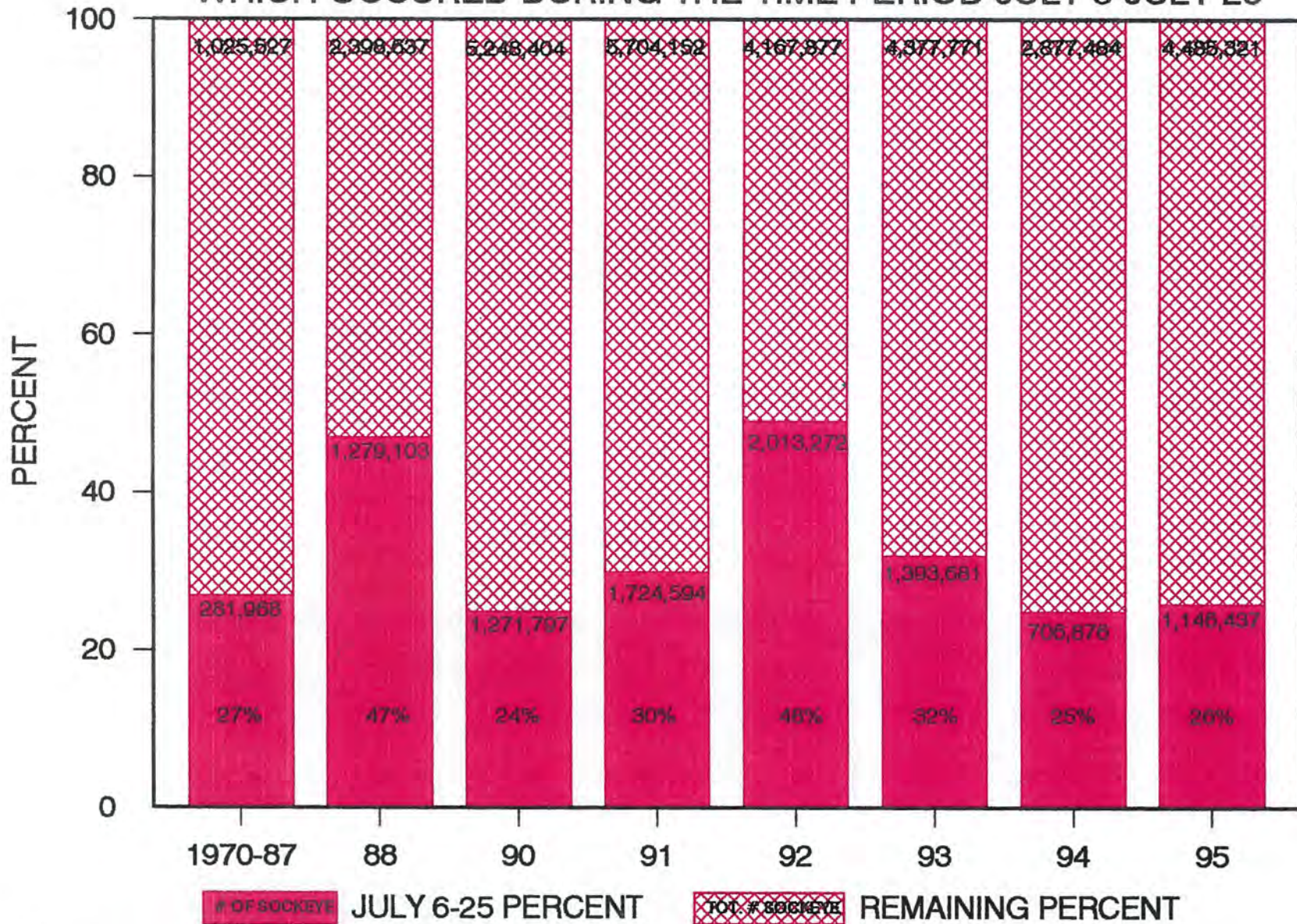


bycatch fishery is the so called "Larry Malloy Final Argument Graph". This is a blowup of one of the Department's graphs used by Dave Prokopowich in his presentation. The chart shows the percentage of the total Kodiak sockeye catch that is captured in the July 6th to July 25th period. With the exception of the two peak Cook Inlet seasons in 1988 and 1992, Kodiak's percentage of Sockeye caught during the Cap Period has remained stable at around 30 %. Again this shouldn't be surprising. Kodiak's sockeye season runs for about 3 months. The cap period is slightly less than one third of the sockeye season and during that time period we catch just less than a third of our fish. If the Cook Inlet thesis were correct, the percentage of sockeye captured during July 6th to 25th should be increasing. (As a footnote: this graph was named the "Larry Malloy Final Argument Graph" because during our work group meetings Larry would go back to this graph over and over again to verify the consistency, over time, of the Kodiak sockeye fishery.)

Let me direct the Board's attention to the size of the Cook inlet return in 1992. As you know, Cook Inlet never had a harvest that exceeded 3 million sockeye until 1982. The 100 year average of the fishery --- even including the recent huge years- is still only an annual catch of about 1.8 million sockeye. Cook Inlet's catches in 1992 exceeded this average by 5.46 times..... It is a Cook Inlet catch that is 5 times the norm that has brought this issue before the board continuously over the past three years. As I illustrated last year, just think about the 1992 Cook Inlet return in terms of the size of the Board of fish,



# KODIAK MANAGEMENT AREA PERCENTAGE OF THE ANNUAL SOCKEYE SALMON HARVEST WHICH OCCURED DURING THE TIME PERIOD JULY 6-JULY 25







you currently have 7 members, what would happen if the Board would suddenly be expanded to 35 members? I would guess some unexpected problems would occur.

You can work the math another way to support the "Mountains and Valleys" chart. If you take the proposed Kodiak bycatch rate in the Barrett/Vining stock separation model for the year closest to the Historical average catch of 1.8 million, you look at 1984, with a catch of 2.4 million sockeye and a bycatch rate of 2.1%. If you multiply the 2.1% by the 5.46 multiplier you have a rate of 11.5. This is very close to the actual 1992 bycatch rate of approximately 12.1%. As the graph shows, Kodiak's bycatch rate has risen and fallen in proportion to the increase in the Cook Inlet runs.

#### Sockeye Availability:

The probable explanation for Kodiak's density dependant bycatch fishery is the availability of Cook Inlet sockeye in the Kodiak management area. As you can see from our migratory chart -- again, this is material presented last year, most Cook Inlet sockeye are not even available to Kodiak fishermen--- not ever. This is a broad misconception --- some folks would have you believe that each and every Cook Inlet fish swims through a gauntlet of Kodiak fishermen before arriving at Cook Inlet. The fact is that most Cook Inlet fish pass through the Kennedy and Stevenson entrances North of Kodiak Island.



We don't know what the actual percentage breakdown is between those fish that travel out of the Alaska counter clockwise gyre into Cook Inlet and those fish that continue south along the east coast of Kodiak Island. However, we do know that the majority of Cook Inlet fish pass through the Kennedy and Stevenson entrances. As the NRC report regarding Kodiak's harvest rates of Cook Inlet sockeye indicated, the data "suggests that the majority of sockeye returning to UCI migrate through Kennedy and Stevenson Entrances rather than Shelikof Strait."

If the Cook Inlet thesis is Correct and the primary variable is fishing effort, not nature and the size of returning runs, Kodiak's bycatch rate should continue to climb -- or at the least-- remain above the 1992 10% range. We all know this hasn't happened. Kodiak fishermen -- even with their new boats, sophisticated equipment, knowledge of how to catch Cook Inlet sockeye, targeting and searching on the capes for Cook Inlet sockeye etc. etc. , in 1994, only captured about 2.5 % of the Cook Inlet run.

Again, this issue is defined by mother nature -- that is the size of Cook Inlet's runs. Not what is or has been happening in Kodiak.

Managing for Local Stocks:



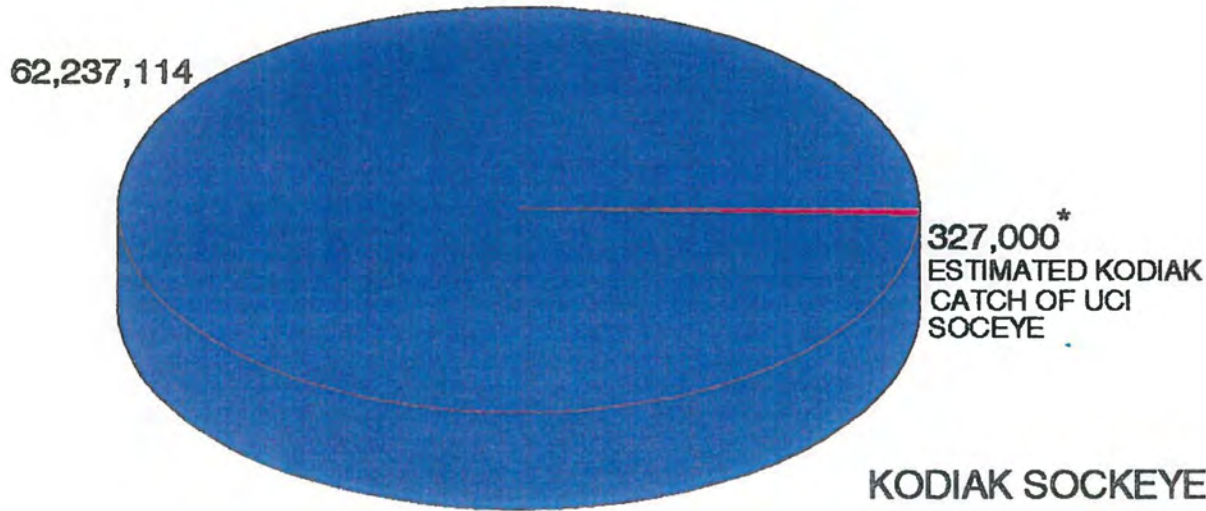
Our third chart, the so called "Pie Chart" graph illustrates the importance of managing the Kodiak fishery for local stocks. The graph should give the Board some idea of the order of magnitude of the Cook Inlet issue in 1995. You see that the big pie is the total 1995 Kodiak return, the estimated Cook Inlet portion of that return is less than 1/2 of one percent. If additional restrictions were imposed on the Kodiak Salmon fishery, you would be impacting 99.5% of the fishery to protect a portion of less than 1/2 of one percent.

The smaller pie also illustrates this point. In 1995 probably only about 5% of the total Kodiak sockeye return were non-local. Imposing regulatory restrictions to preserve a portion of 5% of a fishery while causing reallocation and displacement of a portion of 95% of a fishery simply could not be considered good biological management. This is why the Board should affirm the Department's current time honored approach of managing the Kodiak salmon fishery for local stocks.

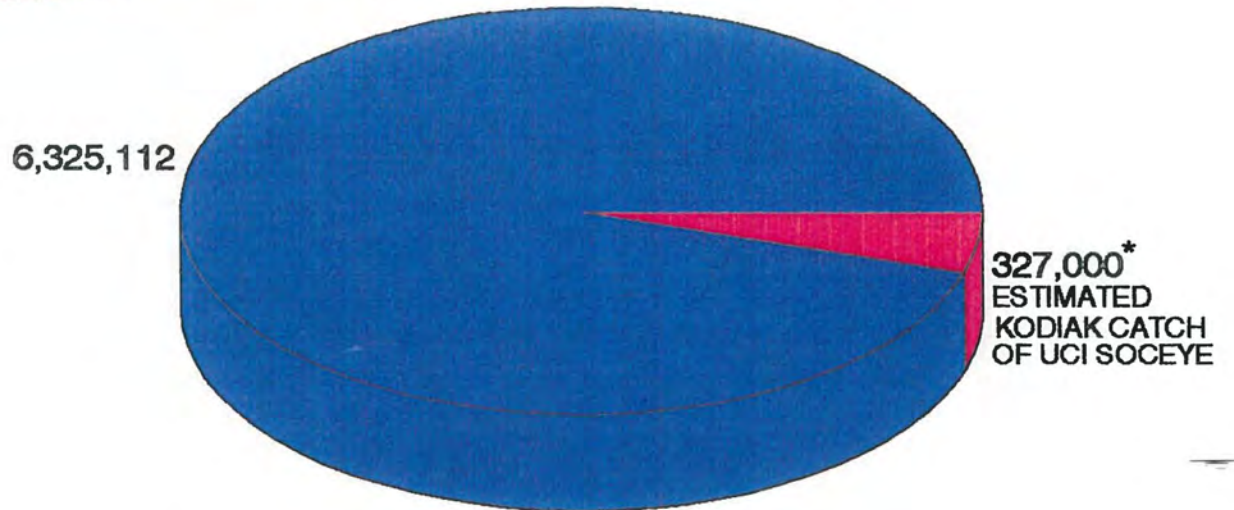
You can see the point about managing for local stocks once again in the smaller graph included in your packet with the heading Kodiak Management Area Salmon Fishery Chronology by Species. During the 1995 season, between July 6th and July 25th approximately 8 million pinks, chums and coho were harvested in Kodiak. Any restrictions in any part of the Kodiak management area on the harvest of these 8 million fish would have resulted in a loss of at least some of these fish.

# 1995 ESTIMATED KODIAK CATCH OF UCI SOCKEYE COMPARED TO KODIAK RETURNS

## TOTAL KODIAK SALMON RETURN



## KODIAK SOCKEYE RETURN



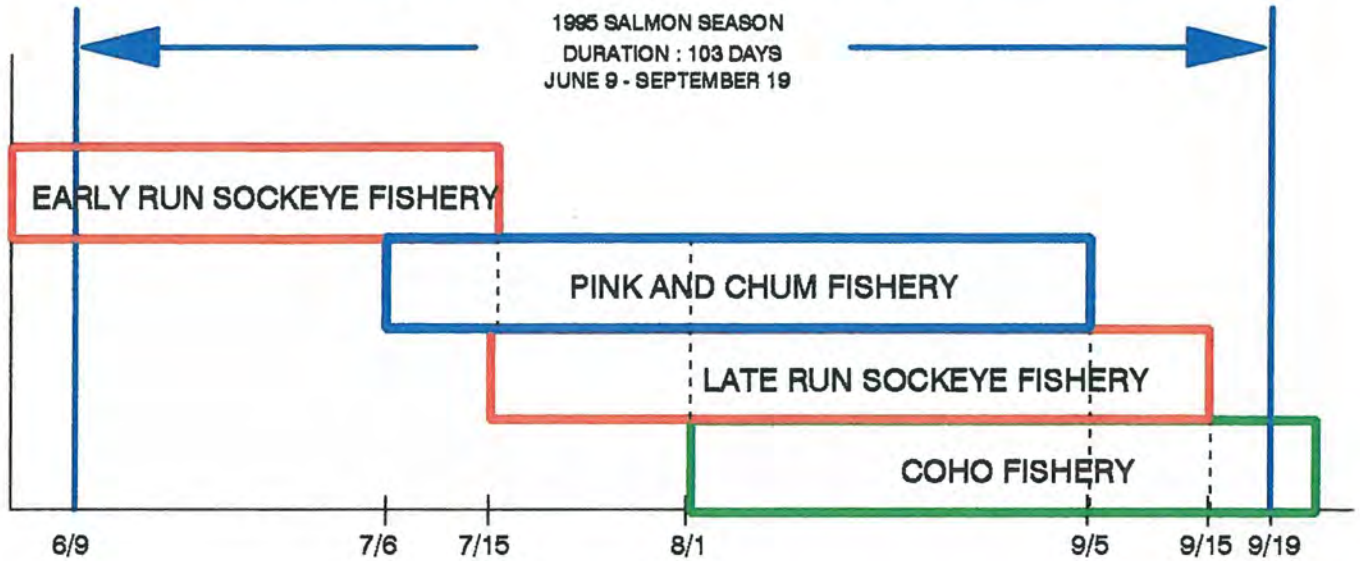
\* KSWG ESTIMATE BASED ON 1990,91,93, & 94 NUMBERS.



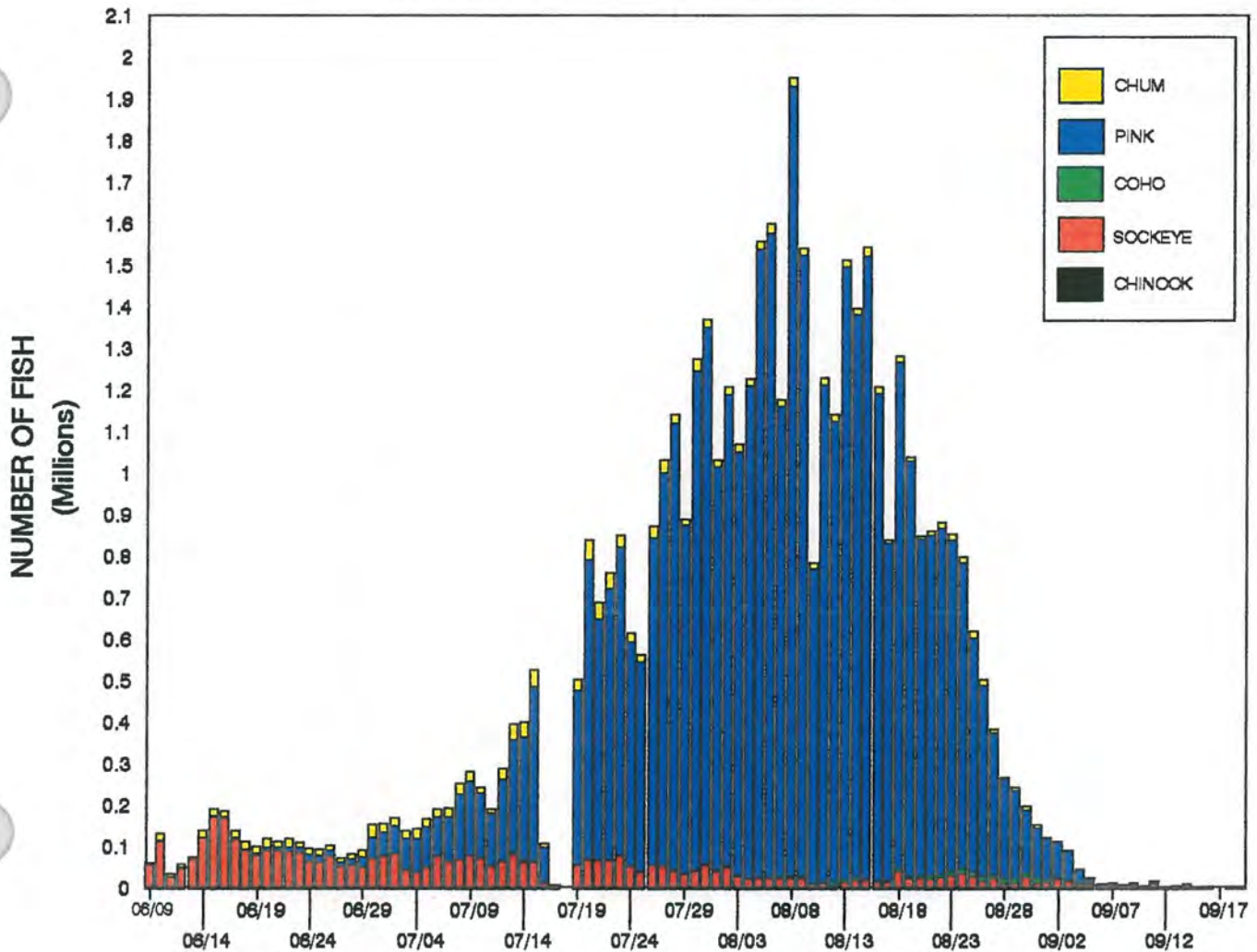




### KODIAK MANAGEMENT AREA SALMON FISHERY CHRONOLOGY BY SPECIES



### KODIAK MANAGEMENT AREA 1995 SALMON HARVEST BY SPECIES





From the middle of July through August, Kodiak processors were at or beyond maximum processing capacity and most processors had severe limits on the fish they would take. Escapement of Kodiak pink salmon in excess of escapement goals in 1995 probably exceeded 5 million fish. Apart from the argument about reduced quality -- a very important argument ---, in a year like 1995, limitations on the opportunity for the Kodiak fleet to catch every possible fish out on the capes as early in the season as possible will always result in overescapement. Even in a year when 1/2 the 1995 pinks are available, overescapement is likely.

#### North Shelikof Management Plan:

I want to move now the regulations imposed by the N. Shelikof management plan -- this is chapter 5 in the Book. (Show chart of area.) You will remember that this management plan was imposed by the Board in 1989 after what had occurred in the N. Shelikof in 1988. The Board, at that time, didn't have the benefit of seeing the 1988 run in the context of subsequent large and smaller Cook Inlet runs. They were concerned about Kodiak fishermen "targeting" Cook Inlet fish in the North Shelikof. The management plan uses "cap" amounts as a trigger mechanism for closures, restricting fishing cape to cape in the larger part of the area, when 15,000 sockeye are captured. As Kevin Brennan indicated yesterday, the North Shelikof Management plan was not intended to be an absolute cap of the number of sockeye caught in the area.



Kodiak Salmon Working Group  
Board Overview  
11/29/95  
Page 10

In concept and practice, the plan set forth a catch number as a trigger mechanism for area closures --- nothing more or less. Several of Cook Inlets' current proposals seem to confuse this basic concept of the North Shelikof plan.

I want to make three points with regard to the N. Shelikof management plan. First, The North Shelikof plan is a regulation on the Kodiak fishery which limits the harvest of Cook Inlet Sockeye. You will hear that there is nothing the Department can do to control Kodiak's incidental catch of Cook Inlet sockeye. Remember. Something already has been done. Second the North Shelikof regulation is substantial and has resulted in significant savings of Cook Inlet sockeye . And third, the N. Shelikof management plan has impacted the remaining Kodiak fishery.

The North Shelikof management plan has closed most of the area on or before July 15th in 5 out of the last 6 years. A high of 89 vessels participated in 1993 and a low of 42 vessels in 1991 with 77 vessels present when the fishery closed in 1995. The plan imposes closures on an area that is equal to a 3 mile line along both sides of the Cook Inlet management area --- see map. When this area is closed, most of the vessel effort is forced to fish elsewhere.

During the 1988 season most of the sockeye catch in the North Shelikof occurred after July 15th. The closures imposed in North Shelikof were implemented on or before this date during the last 5 years. Consequently, given





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run timing, these closures have significantly limited the amount of Cook Inlet sockeye captured. If the percentage of the overall Kodiak bycatch in the North Shelikof catch in 1988 would have remained constant through 1995, the North Shelikof management plan has restricted Kodiak's fishery to save in excess of 1 million Cook Inlet sockeye over the past 6 years. ( I believe Mr. Angasan made this point yesterday regarding the success of the North Shelikof Management plan.)

What happens when the N. Shelikof management plan closes most of the fishery? The primary effect is that the vessels in this area move elsewhere--- and remember this is 60 or 70 vessels. Vessel movement from the North Shelikof has created, in part, what Cook Inlet calls "targeting."

1992 clearly illustrates the problem. Cook Inlet looked at the number of vessels operating the Sitkalidak area and claimed that the Kodiak fleet was targeting Cook Inlet fish. The number of vessels involved in the 1992 fishery in the Sitkalidak section was well within historic fleet levels until July 14 and July 15. At this time the number of vessels jumped from 44 to 50 and then to 65. Where did the new vessels come from?

The N. Shelikof management plan closed the S.W. Afognak section on July 14th at 1:00 p.m. with a fleet of 84 vessels present. Approximately 20 of these vessels traveled to Outer Sitkalidak. This wasn't "targeting", rather this



was a shift in the Kodiak fleet due to regulation to protect Cook Inlet sockeye in the North Shelikof.

A similar circumstance has frequently occurred in the Katmai/Alinchak area. Cook inlet shows the unit effort in this area to indicate a new and expanding fishery. However, the expansion of effort in this area correlates closely with the North Shelikof closures. For example, in 1992 on July 21st. effort jumped from 6 to 12 permits on the first opening after the N. Shelikof closures on July 14th and again in 1994 effort jumped on July 13th and 14th in anticipation of the North Shelikof closures on July 14th.

The problem the North Shelikof plan creates is the so called "domino effect". Once the N. Shelikof management plan was imposed, shifts in the Kodiak fishery were to be expected --- the vessels in the North Shelikof had to fish somewhere. The Board's North Shelikof plan was to limit fishing in the area considered highest in the incidental catch of Cook Inlet Sockeye. Now this Board has been left with the responsibility to review the effects of that management plan. If the board views regulation imposed vessel movement as needing additional regulation, eventually the entirety of Kodiak Island be entangled in ever increasing fishing restrictions. Every regulation will have an effect that will then have to be re regulated.... The entire Cook Inlet debate needs to be viewed through the lens of the effects of North Shelikof Management plan.



In this regard the board should note proposal 134 submitted by the Ouzinkie Native Corporation. The proposal seeks a modest modification of the North Shelikof management plan. Rather than a Headland to Headland closure when the 15,000 sockeye trigger mechanism is attained, the proposal would leave a 1/2 mile strip along Afognak up to Black Cape for fishing. This would contain some of the vessel shift from the area when the cap is reached and limit the so called targeting in other areas. In addition, it will allow for the traditional capture of an increasing amount of local sockeye. While it is true that these sockeye can be captured in the small bays on west Afognak, it is equally true that the exclusive "bay fishery" excludes a number of the larger Kodiak cape seining vessels. Finally, and of great importance to the Ouzinkie fleet, proposal 134 will return their historic fishing area.

Note also what proposal 134 does not do. The half mile line only goes up to Black Cape because this was the extent of the historical fishery --- this will leave more than 1/2 of the coast line in the North Shelikof management area closed cape to cape. Second, the 1/2 mile generally only allows 1 set off the cape. A single set off of less than 5 hook haul spots could not be viewed as "targeting" Cook Inlet fish. Then third, the 1/2 mile is similar to what was opened up in the Southwest Afognak area during the 1993 Board meeting. Our experience during the past three years in the S.W. Afognak area is that no bycatch problems have occurred within the 1/2 mile zone.



Proposal 134 is the type of limited, area specific, time specific, purpose specific, " minor surgery" regulation that the Board should seriously consider. It is a regulation that will enable a small number of local fishermen to continue fishing as they did before 1988. It is also recognition that data points since 1988 point to a density dependant incidental fishery here in Kodiak and not to a new and expanding Kodiak fishery.

#### Cook Inlet Proposals:

I have provided you with a detailed analysis of Cook Inlet's proposal 138. The remaining 4 proposals, 135, 136, 137 & 139 are really subsumed in proposal 138. These four proposals, advocating 24 hour fishing periods, headland to headland closures, half mile zones around Kodiak Island and terminal harvests by Emergency Order are all aggressive and interesting concepts but they are neither new nor are they justified. Proposal 138 is more sophisticated but equally overbroad and unsupported by the available data. Please review the Kodiak work Group's comments regarding this proposal --- I believe there are about 30 pages of point specific criticisms.

In short, any proposal considered by the Board should be tailor fit to meet a defined problem. It should be area, time and species specific. Such a proposal should not create greater problems than it solves. All of the Cook Inlet proposals fail to meet these standards. As I said last March, the Board should



not consider using a meat ax to solve a problem that can be solved by a scalpel.

Sitkalidak:

Let me briefly remind the board of the unique problems associated with the inclusion of the Sitkalidak section and Halibut Bay in any Cook Inlet proposal. Any way you cut it, regulating the Sitkalidak area is going to place a disproportionate burden on the village of Old Harbor. (Show map.) Before imposing any restrictions in the Sitkalidak area the board must ask a question about equity --- is it fair, or right, for a particular village to shoulder an economic burden because Cook Inlet has produced more fish?

Halibut Bay is part of an existing, finely tuned management plan between two important local sockeye systems, Karluk and Ayakulik. Halibut Bay serves as a safety valve for large runs to either of these systems and allows for an orderly harvest of sockeye away from the stream terminus. Limiting fishing opportunities in Halibut Bay would substantially compromise the existing management plan.

Let me conclude by agreeing with you that Kodiak's incidental catch of Cook Inlet sockeye is a complex issue. Not something that can really be covered in 15 minutes of summary material. You have the book we produced ---





over the past three years I've accumulated 3 file boxes of paper on the issue. Nevertheless, several of you have spent considerable time working on this issue and others of you have read much of what has been produced. I can't think of a Board better qualified to make a decision and put this issue to rest.

I believe that Mother Nature, more than any other variable, controls the bycatch around Kodiak Island. If this is true --- and I believe the evidence supports this thesis --- than the Board shouldn't further regulate the Kodiak Management Area to limit the catch of Cook Inlet sockeye. However, even if you don't agree with this thesis and conclude that regulation is necessary, I must emphatically advocate that the 5 Cook Inlet proposals are not the appropriate management tools for the modification of Kodiak's local stocks management policy.

Thank You.







# **PROPOSAL 138**

**(11/29/95 Board Meeting)**

The Board has reviewed this proposal, in essentially the same form, on two prior occasions. The proposal first circulated at the January 1993 Board of Fish meeting in Kodiak. It was then accepted for review by the Board at their March 1994 Board meeting in Anchorage and designated as Proposal 528. Rather than reject Proposal 528, in March, 1994, the Board established an inter-area work group. The proposal was then listed as proposal 333 for the March, 1995 Board meeting in Kodiak. As a result of the work group exchanges, Cook Inlet modified the proposal slightly in December, 1994 and presented the modified proposal at the March meeting. Proposal 138 is essentially the same as prior proposals 528, 333 and the December 1994 proposal --- the proposal that was rejected by the Board last March, here in Kodiak.

I have outlined the three proposals for the Board to compare. The original proposal 528 is in regular text. The December, 1994 revisions are underlined and italicized and changes incorporated in the current proposal are of a different type face and in bold. The substantive analysis follows the proposal comparisons.

## **PROPOSAL 528**

### Paragraph 1:

The purpose of this management plan is to provide direction to the Department in the management of the seine fishery during the July 1-25 period when Cook Inlet Bound sockeye salmon are migrating through the Kodiak Management Area. It is the intent of the Board to allow fisheries throughout the management area to be conducted on Kodiak Area salmon stocks while minimizing the harvest of Cook Inlet sockeye salmon stocks.



## **12/94 Proposal**

The purpose of this management plan is to provide direction to the Department in the management of the seine fishery during the July 6-25 period when Cook Inlet Bound sockeye salmon are migrating through the Kodiak Management Area. It is the intent of the Board to allow fisheries throughout the management area to be conducted on Kodiak Area salmon stocks while minimizing the harvest of Cook Inlet sockeye salmon stocks.

## **11/95 Proposal 138**

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### **Paragraph 2:**

## **Proposal 528**

The Board recognizes that some incidental catch of Cook Inlet sockeye and other stocks has and will occur in this area while the seine fishery is managed for Kodiak Area Salmon stocks. The Board intends, however, to prevent a repetition of the non-traditional harvest patterns that have occurred since 1986. Therefore, the Board establishes the following direction to the Department for management of salmon stocks during the July 1-25 period:

## **12/94 Proposal**

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The Board recognizes that some incidental catch of Cook Inlet sockeye and other stocks has and will occur in this area while the seine fishery is managed for Kodiak Area Salmon stocks. The Board intends, however, to prevent a repetition of the non-traditional harvest patterns that have occurred since 1987.

### **Paragraph 3:**

## **Proposal 528**

The board intends to minimize the interception of Cook Inlet sockeye salmon in the Kodiak management Area to not exceed 5% of the total Cook Inlet Sockeye salmon returns. An annual post season analysis will be conducted to determine if the goal of the Board is met.

## **12/94 Proposal**

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## 11/95 Proposal 138

The Board intends to minimize the interception of Cook Inlet sockeye salmon in the Kodiak Management Area to not exceed 5% of the total Cook Inlet sockeye salmon return. An annual post season adjustment will be conducted to determine if the goal of the Board is met. Management adjustments in succeeding years will be made to meet this goal.

### Paragraph 4:

(With subparagraphs (1), (2) and (3).)

## Proposal 528

Therefore, the Board establishes the following direction to the Department for management of salmon stocks during the July 1 - 25 period:

- (1) When predominately local Kodiak stocks are present within any management district, emergency orders will be given consistent with the management plan for that district;
- (2) When predominately Cook Inlet sockeye or other non-local stocks are present within any management district, the Department shall use emergency order authority to minimize the interception of these stocks;
- (3) The Department shall attempt to minimize the interception of Cook Inlet Sockeye and other non-local stocks during the July 1-25 period by the following means:
  - (A) Restrict fishing time: Emergency orders extending fishing time will not be given when it is apparent to the Department that based on fish size, species composition, harvest patterns, or other information available that the predominate salmon stocks harvested within any district or section of the Kodiak Management Area are of non-local origin;
  - (B) Restrict fishing area: The Department shall restrict the seine fishery in any district or section of the management area from fishing seaward of lines drawn from headland to headland when predominately Cook Inlet sockeye and other non-local stocks are present in offshore waters. Lines drawn closing offshore areas will be based on the Kodiak Area staffs knowledge of the fishery that takes place in the area and the best information available at the time;

## 12/94 Proposal

Therefore, the Board establishes the following direction to the Department for management of salmon stocks during the July 6 - 25 period:

- (1) When predominately local Kodiak stocks are present within any management district, emergency orders will be given consistent with the management plan for that district;
- (2) When predominately Cook Inlet sockeye or other non-local stocks are present within any management district, the Department shall use emergency order authority to minimize the interception of these stocks;
- (3) The Department shall attempt to minimize the interception of Cook Inlet Sockeye and other non-local stocks during the July 6-25 period by the following means:





(A) Restrict fishing time: Emergency orders extending fishing time will not be given when it is apparent to the Department that based on fish size, species composition, harvest patterns, or other information available that the predominate salmon stocks harvested within any district or section of the Kodiak Management Area are of non-local origin;

(B) Restrict fishing area: The Department shall restrict the seine fishery in any district or section of the management area from fishing seaward of lines drawn from headland to headland when predominately Cook Inlet sockeye and other non-local stocks are present in offshore waters. Lines drawn closing offshore areas will be based on the Kodiak Area staffs knowledge of the fishery that takes place in the area and the best information available at the time:

## **Proposal 138**

Therefore, the Board establishes the following direction to the Department for management of salmon stocks during the July 6-25 period:

(1) When predominately local Kodiak stocks are present within any management district, emergency orders will be given consistent with the management plan for that district;

(2) When predominately Cook Inlet sockeye or other non-local stocks are present within any management district, the Department shall use emergency order authority to minimize the interception of these stocks;

(3) The Department shall attempt to minimize the interception of Cook Inlet Sockeye and other non-local stocks during the July 6 -25 period by the following means:

(A) Restrict fishing time: Emergency orders extending fishing time will not be given when it is apparent to the Department that based on fish size, species composition, harvest patterns, or other information available that the predominate salmon stocks harvested within any district or section of the Kodiak Management Area are of non-local origin;

(B) Restrict fishing area: The Department shall restrict the seine fishery in any district or section of the management area from fishing seaward of lines drawn from headland to headland when predominately Cook Inlet sockeye and other non-local stocks are present in offshore waters:

### **Paragraph 5:**

## **Proposal 528**

In addition to the above in-season management actions the following areas are closed to seine fishing to protect migrating Cook Inlet sockeye salmon and other non-local stocks during the July 6-25 period.

(A) The Halibut Bay section of the Southwest Kodiak District;

(B) The outer statistical areas 258-10 and 258-40 of the Sitkalidak Section of the Eastside Kodiak District; and

(C) The Katmai and Alinchak Bay Sections of the Mainland District.

## **12/94 Proposal**



In addition to the above actions seine fishing in the following areas will be restricted as follows to protect migrating Cook Inlet sockeye salmon and other non-local stocks during the July 6-25 period;

(A) From July 6-25 in the Halibut Bay Section of the Southwest Kodiak District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 39,000 sockeye salmon;

(3) when the harvest reaches 39,000 sockeye salmon the department shall close the fishery by emergency order until the first regularly scheduled period that follows July 26.

(B) From July 6-25 in the Sitkalidak Section of the Eastside Kodiak District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 17,500 sockeye salmon;

(3) when the harvest reaches 17,500 sockeye salmon, the department shall restrict the fishery by emergency order to the inside waters on the Sitkalidak Section (statistical areas 258-20; 30; 51; and 52)

(4) terminal harvest areas may be opened by emergency order based on local stock abundance within the outside waters of the Sitkalidak section (statistical area 258-40) once the 17,500 sockeye cap is reached.

(C) From July 6-25 in the Katmai/Alinchak Section of the Mainland District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 6,900 sockeye salmon;

(3) when the harvest reaches 6,900 sockeye salmon, the department shall restrict the fishery by emergency order to waters inside (shoreward) of lines drawn from headland to headland.

## Proposal 138

In addition to the above actions seine fishing in the following areas will be restricted as follows to protect migrating Cook Inlet sockeye salmon and other non-local stocks during the July 6-25 period;

(A) From July 6-25 in the Halibut Bay Section of the Southwest Kodiak District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 39,000 sockeye salmon;





(3) when the harvest reaches 39,000 sockeye salmon the department shall manage the fishery by emergency order until the first regularly scheduled period that follows July 26.

(B) From July 6-25 in the Sitkalidak Section of the Eastside Kodiak District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 17,500 sockeye salmon;

(3) when the harvest reaches 17,500 sockeye salmon, the department shall close that portion of the section seaward of a line 1/2 mile offshore extending along the east side of Sitkalidak Island from the longitude of Rolling Bay to Cape Barnabas until the first regularly scheduled period that follows July 26.

(C) From July 6-25 in the Katmai/Alinchak Section of the Mainland District the department shall manage the fishery as follows:

(1) the management of the fishery shall be based on local stocks;

(2) the fishery shall remain open during normal fishing periods until the harvest reaches 6,900 sockeye salmon;

(3) when the harvest reaches 6,900 sockeye salmon, the department shall close that portion of the section seaward of the line from Cape Ilktugitak to Cape Kubugakli to Cape Kerkurnoi to Cape Aklek until the first regularly scheduled period that follows July 26th.

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It is clear from the above comparison that proposal 138 is like a leopard that has tried to shed its spots --- small changes in form have not changed the substance of the proposal . Despite the March 1995 revelations that the average wt. analysis is suspect, 1993, 1994 and 1995 data points showing that 1992 was a density dependant anomaly and testimony regarding the reallocation, displacement, and chaos this proposal would have, Cook Inlet has not altered its basic 1992 position.. If the Board were to determine that a problem existed, the solution to such a problem should be much more refined.

The fundamental problem with proposal 138 , as well as Cook Inlet's other proposals, is that it moves beyond regulation of what may be "new and expanding" and tries to wrestle a larger market share from Kodiak by reducing the Kodiak fishery to a level



far below what has historically occurred.

Kodiak's response to proposal 138 is as follows:



# Response

1. The proposal will have substantial impact on all gear types in Kodiak. If the intent was to manage the Kodiak seine fishery, the proposal is far too broad.
2. The July 6-25 time period is also too broad. Catch records show that during many seasons, substantial numbers of Cook Inlet fish are not present in the Kodiak Management area, eg. 1994. Moreover, these catch records also show that during years when there is a presence of Cook Inlet fish, these fish are not present in any given statistical area for more than 7 -10 days, ie. 1992.
3. If it is the intent of the Board to allow fisheries to be conducted on Kodiak Area salmon stocks, complete closures in any area should not be imposed. Complete closures eliminate or reduce local stock fisheries.
4. "Minimizing" is a vague and ambiguous term and an



inadequate directive for fish management. Moreover, there is no statutory or regulatory basis for the "minimize" language. The issue is whether or not there is a new and expanding fishery, not how many fish are taken.

5. Finally, nothing in the first paragraph of the proposal acknowledges the tremendous growth of the Cook Inlet runs. Kodiak's bycatch percentage of Cook Inlet fish is a mirror image of the size of Cook Inlet returns -- with larger runs we tend to catch a larger percentage of Cook Inlet fish. THE SIZE OF COOK INLET'S RUNS IS THE SINGLE GREATEST VARIABLE IN THIS DEBATE.
  
6. The use of 1987 as a watershed year gives short shrift to the 100 plus year history of Kodiak's bycatch of Cook Inlet fish. Once again, nothing is mentioned about the growth of Cook Inlet stocks and nothing ties this proposal to what is happening with the fishery in Cook Inlet.
  
7. The Kodiak management area is already managed for local



stocks, any changes in current management will alter the present system -- which is management for local stocks -- and create a system that is, at least in part, no longer management for local stocks.

8. The base years used by Cook Inlet to establish "non-traditional" harvests reflect an inaccurate and selective bias. Cook Inlet uses base years of low Kodiak sockeye and low Cook Inlet sockeye abundance to establish what was traditional and then compares these base years to years of large sockeye abundance in both areas to claim "non-traditional" harvests.. This is an apples and oranges comparison.
  
9. Cook Inlet acknowledges that Kodiak's cape fishery is an historical fishery and that Kodiak has always had "some incidental catch of Cook Inlet sockeye", we believe the base for determining what is traditional should go back at least 50 years. Sockeye catches in Kodiak in the 1940's and 1950's clearly reflect a Cook Inlet component to the catch and a substantial cape fishery. The changes occurring in 1988 and 1992 were primarily due to the size of the Cook Inlet runs.





10. Cook Inlet cannot support the "non-traditional" harvest pattern thesis for more than a year or two in any given statistical area. There are some shifts in Kodiak harvest patterns in years of high Cook Inlet sockeye returns. The shifts, however, do not show a continuing pattern and thus do not support the idea of a new and expanding fishery. For example, in the Sitkalidak section in 1992, ( during the large Cook Inlet return), the permit and landing data shows some shift in Kodiak fishing effort for about 4 days. However, this is not seen in 1993 or 1994. And, at least 5 times from 1959 to 1987, fishing effort in the Sitkalidak section exceeded what occurred in 1992.
  
11. The Cook Inlet thesis of "non-traditional" harvest patterns does not account for the changes in Kodiak fishing patterns that necessarily occurred with the imposition of the North Shelikof management plan. The fleet displaced by the North Shelikof management plan has been forced to find other capes to fish on. While it is true that this is "new", it does not represent an expansion of the Kodiak fishery -- these vessels have always been fishing the capes. In 1992, for example, the day after the North Shelikof was closed, approximately the same number of



vessels that had been fishing in the North Shelikof appeared in the Sitkalidak area.

12. The "minimize" language in paragraph 1 is now attached to a percentage. This is more concrete but does not appear to actually allocate 5% of the run to Kodiak. The goal is still to minimize, and anything less than 5% is acceptable. The proposal, as written, does not actually allocate 5% to Kodiak, it just doesn't want the bycatch to exceed 5%. If the concept of the proposal is caps and closures, it would be better to eliminate the "minimize", "manage for local stocks" and "historical fishery" language and simply state that Kodiak is allocated 5% of the Cook Inlet run. This is clearer but still problematic because of the basis for a 5% figure.
  
13. Caps are crude management tools that, in this situation, will eliminate local harvest opportunities and could, in some cases, eliminate necessary local harvest options -- thereby creating overescapement. The Kodiak fishery is distinct from the Chignik/Igvak conflict or the Area M issue. Seven (7) districts and fifty two (52) sections are being managed simultaneously



based on **local stocks**. One third of the local sockeye and up to half of other local non-sockeye are captured when the Cook Inlet fish come through the Kodiak Management Area. For example, in the Sitkalidak Section, even in 1992, 54% of the fish captured were local stocks.

14. Identifying, in-season, the number of Cook Inlet sockeye harvested in Kodiak is exceedingly difficult or simply not possible.. All methods conceived thus far are not particularly accurate, (weight analysis, scale analysis, catch patterns) and genetic stock identification is neither available nor would it be timely in season. What is the proposed method for determining the 5%? Current fishery managers are unwilling to consider in-season stock identification.
  
15. A Kodiak allocation of a percentage of Cook Inlet's preseason projected return, based on the experience of the past 10 years, would be highly inaccurate. For example, in 1994 with a preseason forecast of two million, their actual catch was three million seven hundred thousand. Cook Inlet's forecast error rate in 1993 was @ 90% and in 1992 it exceeded 150%.



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16. Caps don't reflect the dynamic variables of the fishery. For example, the Cook Inlet returns for 1990 and 1994 were approximately the same. A cap would assume a fixed bycatch rate, however, the Kodiak bycatch rate declined from 5.5% in 1990 to 1.8% in 1994. **Note: what is actually happening in the fishery indicates that Kodiak's fishery, over the past two years, is constricting rather than expanding.**
  
17. The current range of Cook Inlet preseason forecast limits accurate approximation of what Kodiak's allocation would be. For example, the 1995 preseason forecast was between 1.3 and 11.9 million fish, what amount would be allocated to Kodiak?
  
18. "Management adjustments in succeeding years" is vague and will cause problems. If managers underestimate the 5 % one year does that mean Kodiak gets more than 5% another year .... what about if there is a conservation concern? Or, what about value, if the underestimate is on a year of higher value, wouldn't Kodiak be entitled to more fish in years of lower value.



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19. Post season adjustments also lock the Department into a yearly post season stock separation analysis for all of Kodiak Island. This is expensive, time consuming, and presumes funding which may not be available.
20. The "other non-local" stocks language is unnecessary. Kodiak has historically fished "non-local" stocks other than the Cook Inlet fish. The issue remains, does Kodiak have a "new and expanding" fishery with regard to Cook Inlet stocks.
21. The "any district" language is much too broad and lacks substantive support or justification. For example, why should the S.E. Afognak section be subject to management for Cook Inlet sockeye?
22. Invasive management as envisioned by this proposal would interfere with existing management plans, harvest of local stocks and traditional fishing patterns as well as the allocation between gear types. There is currently an uneasy balance in the allocation between Kodiak setnet and seine fisheries.





Changing this balance will create havoc in the Kodiak salmon fishery. There are numerous examples of allocation shift with the imposition of the headland closures. One illustration is the Northwest Kodiak District. If closure to headlands would occur, what would happen with the setnetters between Long Beach and Broken Point?

23. Subparagraphs (2) and (3), as written, still use the "minimize" language. This would be internally inconsistent with the 5% allocation mentioned in paragraph 3.
  
24. Parts (A) and (B) of subparagraph 3 are cumulative.  
Emergency orders, extending fishing, are always based on the abundance of local stocks and current local escapement.  
Fishing time in Kodiak is not extended because of the occasional presence of Cook Inlet stocks. (Cook Inlet has yet to furnish an example of when and where this may have occurred.) Consequently, limiting extension of fishing time has a direct and detrimental effect on the harvest of local stocks --- especially if we are talking about "any management district".



25. Headland to headland restrictions are cannot be factually supported and would be contrary to Board policy. The Board is directed to regulate only if they determine that there is a new and expanding fishery. If a "new and expanding" determination is made, the regulation should be tailor fit to reduce the fishery back to its level prior to expansion. Kodiak's historical fishery has always been out on the capes -- even if the Board determines that the fishery has expanded, the regulation should be limited to the expansion. Any reduction of fishing to headlands would restrict Kodiak beyond what all parties agree is Kodiak's historical fishery.

HALIBUT BAY

1. The regulations in paragraph 5 should be separated from the rest of the proposal. The proposal, as written, is cumulative. These last three area specific regulations come on top of the "minimize" directive, the not to exceed 5% language, the island wide restrictions on extended openings and the headland to headland closures. Now, in addition to all of this, the regulation presents three sets of section specific additional restrictions. Enough!



2. Halibut Bay is part of an existing, Board approved, management plan. The Halibut Bay fishery is now over 100 years old. When Kodiak has strong local sockeye runs, it is a major sockeye harvest area. Halibut Bay is currently only open when two local sockeye systems have healthy returns. It is always regulated based on local stock abundance and the local fishery. Subpart (A)(1) doesn't need to affirm local stock management.
  
3. Changing how Halibut Bay is managed, will alter the existing Ayakulik and Karluk management plans. It will further reallocated fish between gear types on Kodiak and it will dislocate a portion of the Kodiak fleet to other capes. The mixed stock fish policy wisely counsels, "Existing regulatory management plans are understood to incorporate conservation burden and allocation."
  
4. Justification for regulation of Halibut Bay is based on what occurred in 1992, a year of large sockeye returns to Cook Inlet. The mixed stock fish policy cautions, "New and Expanding fisheries will not be gaged against single year anomalies in



distribution or effort, or against natural fluctuations in the abundance of fish."

5. Subparagraph (A) dealing with Halibut Bay is a clear cap and closure proposal. Closures, when a cap is reached, do not provide for the harvest of local stocks. Overescapement is possible and harvest quality quickly diminishes. This is not a theoretical concern. Currently, Kodiak fishermen are suffering from the oil spill imposed overescapement to the Ayakulik system. The system is not expected to recover until 1997, eight years after the oil spill!
6. The closure proposed is for whatever time remains in the July 6 to 25 time period. Catch records show that Cook Inlet fish would only be in the Halibut Bay area for a few (3-5) days after the cap is reached. The Closure is too broad.
7. The 39,000 number is some combination of "base years" prior to the large Cook Inlet runs. If a cap is to be determined, Halibut Bay catches should be analyzed for years when there has been maximum local fishing opportunities. Any cap



amount should be based on those years. Otherwise, in years of local abundance, the cap will be reached with local fish.

(Note: Any cap calculations would exclude strike years or years of complete closures. Neither of these types of seasons reflect a "historical" catch amount in the Halibut Bay area.)

8. As a practical matter, the Department will be unable to accurately monitor caps and impose regulatory restrictions. The Department's only vessel is already employed to the North Shelikof Management Area. Without additional funding and resources, caps will be very difficult to manage in season.

- SITKALIDAK:
1. The Sitkalidak Section of the Eastside Kodiak District is one of the oldest fisheries on Kodiak Island. There is no question that Kodiak salmon fishermen have been fishing off the capes Sitkalidak Island since before recorded history. Since commercial fishing started, the Sitkalidak fishery has consistently been a cape fishery. This is not a "new" fishery.





2. The Sitkalidak fishery is the primary area for Old Harbor residents to fish. Reductions in this fishery will place a disproportionate burden on Old Harbor.
  
3. Justification for regulation in Sitkalidak is also based primarily on what occurred in 1992. As indicated above, "New and Expanding fisheries will not be gaged against single year anomalies in distribution or effort, or against natural fluctuations in the abundance of fish."
  
4. The Sitkalidak proposal (unlike the Halibut Bay regulation) recognizes the importance of the harvest of local stocks -- but just barely. The proposal allows for a 1/2 mile fishing zone and limited harvests of local stocks by emergency order. This is an improvement but does not appreciate the abundance of local stocks in the area. For example, even in 1992, when approximately 300,000 Cook Inlet sockeye were harvested, local stocks consisted of almost 400,000 fish. In 1991, almost 1 million local fish were harvested in this area during the July 6 - July 25 the time period and in 1995 the local pinks and chums exceeded 500,000 fish. The Department is suppose to



provide for this magnitude of harvest by "emergency order"?

5. Necessarily related to the local harvest issue is the allocation issue. If Sitkalidak is restricted, substantial salmon will be reallocated to the setnetters in the Olea\Maser Bay area. Again, such a regulation will unnecessarily create conflict in Kodiak between gear types. As the mixed stock fish policy states, "Most mixed stock fisheries are long standing and have been scrutinized many times by past boards." The allocation between purse seine and setnet gear on Kodiak Island is one of these fisheries.
6. The cap restriction moving the fleet into a 1/2 mile zone of the Sitkalidak section is better than a closure but, as indicated above, does not account for the historical fishery, restricts local harvests and reallocates fish. The Cap, in general, does not reflect changes in the abundance of Cook Inlet sockeye.
7. As a practical matter, the Department will be unable to accurately monitor caps and impose regulatory restrictions. The Department's only vessel is already employed to the



North Shelikof Management Area. Without additional funding and resources, caps will be very difficult to manage in season.

8. The closure proposed is for whatever time remains in the July 6 to 25 time period. Catch records from past years show that this is overbroad. Cook Inlet fish will only remain in the area for another 3 to 5 days.
  
9. The 17, 500 sockeye number is so low it cannot be taken seriously. It does not reflect that in each of the last 4 years, including 1994 when very few Cook Inlet sockeye were captured, the catch of local sockeye exceeded twice this amount. In short, local sockeye would have triggered the cap in each of the last four years even if not a single Cook Inlet sockeye were present! Any cap number must be based on the availability of local sockeye as well as the abundance of Cook Inlet sockeye. Note that the cap should include the "historical" catch component of the Cook Inlet run as well as whatever local fish could be available.
  
10. Kodiak's 1983-1994 analysis, submitted to the work group on



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12\15\94 , applies this portion of the Cook Inlet proposal on a year by year, day by day basis to the Sitkalidak area. This analysis shows that there was not a single year when the catch of Cook Inlet sockeye exceeded the catch of local stocks.

#### KATMAI\ALINCHAK

1. Katmai\Alinchak and all of the Alaska Peninsula in the Kodiak Management area is subject to wide variations in local stock availability and consequently, has had wide variations in fishing effort and fishing time. Comparisons of yearly statistical data must be done with care. The Cook Inlet approach is to ignore strikes, closures, and local abundance and "just take an average" from a few select years. This is not a fair or accurate way to determine a cap.
2. The Cook Inlet proposal does not account for the displacement of the Kodiak fleet that occurred when the N. Shelikof plan was implemented. Regulatory displacement of an existing fleet does not create a new and expanding fishery.



3. The Katmai\Alinchak proposal (unlike the Halibut Bay regulation) recognizes the importance of the harvest of local stocks. It allows for limited harvests of local stocks within the headlands of the area. Such a fishery may have the appearance of allowing for the harvest of local stocks, however, because of the geography of the area and the shallow beaches and tide flats, a cape to cape fishery is almost no fishery at all. There is substantial possibility of loss of local stocks, overescapement and poor quality catches. For example, back in 1984 almost 50,000 local fish were caught in this area. The current proposal would have eliminated the catch of many of these fish.
  
4. Also at issue in Katmai\Alinchak is how much restriction is justified in the proportional sharing of the allocation burden -- especially given the historical fishing opportunities on the mainland for the Kodiak fleet. The N. Shelikof management plan has already restricted fishing along more than 2/3 of the Mainland management area. Additional closures would restrict fishing by Kodiak fishermen for a strip 3 miles wide by 42 miles long, this is an area of 126 square miles!





5. The proposed fishing limitations in Katmai/ Alinchak are for whatever time remains in the July 6-25 time-period after the cap is reached. Catch records from past years show that this is overbroad. Cook Inlet fish will only remain in the area for another 3 to 5 days.
  
6. The 6,900 sockeye cap for this area before fishing restrictions are imposed is not a fair or accurate calculation of what a cap should be. As indicated above, the individual yearly circumstances of local stock availability and fishing time, as well as strikes, has greatly impacted the catches in the Katmai Alinchak area. If a cap is set, it should reflect the unique yearly circumstances of the area and non-Cook Inlet catch potential as well as the availability of local stocks and the size of Cook Inlet's returns.

In many years, catches of non-Cook Inlet sockeye have exceeded Cook Inlet sockeye and also the proposed cap. For example, in 1987, 1990, and 1993, the cap would have been reached even if not a single Cook Inlet sockeye was captured.



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8. Kodiak's 1983-1994 analysis, submitted to the work group on 12/15/94, applies this portion of the Cook Inlet proposal on a year by year, day by day basis to the Katmai\Alinchak area.. This analysis shows that only twice in the last 11 years has the catch of Cook Inlet sockeye exceeded the catch of local stocks in the Katmai\Alinchak area.
  
9. As a practical matter, the Department will be unable to accurately monitor caps and impose regulatory restrictions. The Department's only vessel is already employed to the North Shelikof Management Area. Without additional funding and resources, caps will be very difficult to manage in season.



## CONCLUSION:

The Cook Inlet proposal seeks to create a restricted Kodiak salmon fishery --- one that never existed in the past. The proposal is not tailored to fit a specific new and expanding fishery. The final section of the proposal, when separated from the first four paragraphs, is more of an attempt to regulate for possible expanded fisheries. Nevertheless, this section is also far too broad and invasive. The final section further affirms that Cook Inlet's position has not substantially changed despite new and important information regarding the issue. Cook Inlet cannot ignore the 1993, 1994 and 1995 data points.

If the Board determines that regulation is necessary, Kodiak's proposal for dynamic caps and restrictions tailored to our historic fishery is substantively superior to the above proposition. The Kodiak proposal will reduce opportunities for "targeting" Cook Inlet fish, allow for responsible harvesting of local stocks and maintain established allocations between Kodiak gear groups. Last, and perhaps most important, Kodiak's proposal can be implemented by the Department without additional funding or personnel.



Board members.

As you are all aware Kodiak Island has problems with their own Natural Salmon runs! We have been trying to get the attention of the Board, ADFG, and other local fishermen to understand the interception and low escapement situation of the Alitak Sockeye runs.

Our group has been speaking out for some time now and we are the main the reason why the Genetic study was conducted on Kodiak. The results of this test show significant interception of Alitak bound sockeye harvested all over the Island. (see info below). We are at the end of the road, our runs get caught before they reach us. Our runs continue to fail. No relief or support from other Kodiak fishermen. Convincing other (profitable) Kodiak fishermen that they should help conserve the fish that they are catching is nearly impossible! They are on the receiving end of the benefits of wild Salmon while others are stuck carrying the burden for future returns. The regulation book has verbiage in place to level the playing field for Salmon and all fishermen in the fleet. -Time to act on the salmon sustainability policy!

I was the one who proposed to have a pulse fishery on Kodiak. -Protect the migratory pathway and share the burden of conservation. -Pretty simple.

Here is what took place this past summer. The west side of Kodiak fished continuous for 45 days in June and July, within that time frame the Alitak area was closed for 24 days straight waiting for escapement. Classic story of NO shared burden of conservation from fishermen who are harvesting Alitak fish in their migratory pathway on the West side of Kodiak.

Are we ever going to do anything about the rebuilding of these weak runs, making the fishery an equitable distribution on the Island, and protect the migratory pathways? A few management changes, compromise, and we could have a working solution for everyone involved.

Take another look at the charts below and see that Kodiak has major problems because ADFG refuses to acknowledge their ongoing mistakes. Reduction of escapement into Alitak systems and extended fishing periods for the rest of the Island has led to a total economic failure for the setnet fleet in the Alitak district. Kodiak is being totally mismanaged. Return per spawner information is not correctly being applied to their respective systems because the fish are being harvested outside of our district. The problems keep stacking up but the solution is simple, pulse the fishery and or limit harvest in migratory pathways!

Now is a great time to figure out a modern way to manage this intercept Island fishery. Non-stop fishing is not a way to promote healthy ecosystems state wide!

The time is now. The information is all there. Take a progressive approach to letting the fish make it back to their spawning grounds in the numbers we need for robust future returns!

Thank you.

Eric Dieters

Alitak Fisherman, Kodiak. Family business 43 seasons. - going out of business.



## Genetic Stock Composition Information for Alitak Sockeye

### Upper Station/Akalura Sockeye Harvest

	2014	2015	2016
Uganik-Kupreanof	8,203	966	-
Uyak	13,411	-	2,006
Karluk-Sturgeon	13,723	4,045	3,810
Ayakulik-Halibut Bay	20,529	11,691	4,142
<b>W &amp; SW COMBINED HARVEST</b>	<b>55,866</b>	<b>16,702</b>	<b>9,958</b>

Alitak District Seiners Harvest	8,829	12,665	17,264
Estimated Alitak Setnet Harvest	14,224	26,152	28,991
<b>Total Alitak District Harvest</b>	<b>23,053</b>	<b>38,817</b>	<b>46,255</b>

<b>Escapement Total ER+ LR</b>	<b>218,234</b>	<b>187,337</b>	<b>193,060</b>
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<b>TOTAL RUN Escapement + Harvest</b>	<b>297,153</b>	<b>242,874</b>	<b>249,273</b>
<b>W &amp; SW COMBINED HARVEST</b>	<b>18.80%</b>	<b>6.88%</b>	<b>3.99%</b>
<b>Total Alitak District Harvest</b>	<b>7.81%</b>	<b>15.98%</b>	<b>18.55%</b>

Data in this document was used from the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016 and Kodiak Management Area Salmon Escapement and Catch Sampling Results, 2014 –2016





# Ayakulik/Frazer Sockeye Harvest

	2014	2015	2016
Uganik-Kupreanof	17,431	3,715	1,380
Uyak	29,466	2,258	7,264
Karluk-Sturgeon	45,406	15,081	5,115
Ayakulik-Halibut Bay	236,602	252,727	62,295
<b>W &amp; SW COMBINED HARVEST</b>	<b>328,905</b>	<b>273,781</b>	<b>76,054</b>
<b>70% Ayakulik /30 % Frazer</b>	<b>230,234 / 98,671</b>	<b>191,647 / 82,134</b>	<b>53,238 / 22,816</b>

Alitak District Seiners Harvest	66,942	55,537	24,579
<b>70% Frazer / 30% Ayakulik</b>	<b>46,859 / 20,083</b>	<b>38,875 / 16,662</b>	<b>17,205 / 7,374</b>

Estimated Alitak Setnet Harvest	112,031	89,556	49,636
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Escapement Total Frazer Lake	200,296	219,093	122,585
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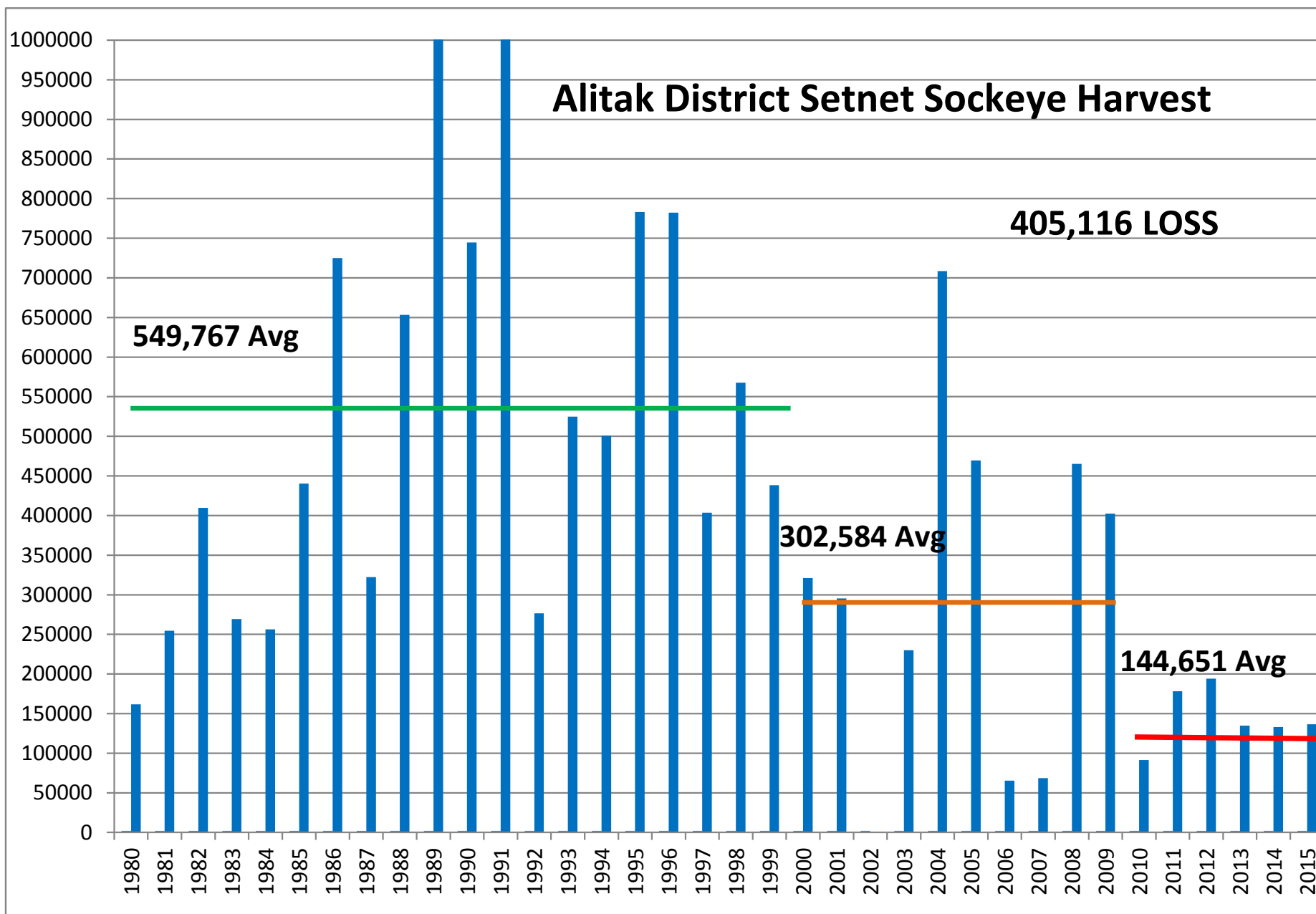
<b>TOTAL RUN Escapement + Harvest</b>	<b>457,857</b>	<b>429,658</b>	<b>212,242</b>
<b>W &amp; SW COMBINED HARVEST</b>	<b>21.5% at 30% ratio</b>	<b>19.1% at 30% ratio</b>	<b>10.7% at 30% ratio</b>
<b>Alitak Setnet + Seiner(70%) Harvest</b>	<b>34.7% at 70% ratio</b>	<b>29.8% at 70% ratio</b>	<b>31.4% at 70% ratio</b>

Numbers below show hypothetical mixed percentages of Frazer and Ayakulik sockeye

	2014	2015	2016
<b>W &amp; SW COMBINED HARVEST</b>	<b>328,905</b>	<b>273,781</b>	<b>76,054</b>
50% Frazer/ 50% Ayakulik Sockeye	164,452/164,452	136,890/136,890	38,027/38,027
40% Frazer/ 60% Ayakulik Sockeye	131,562/197,343	109,512/164,269	30,421/45,633
30% Frazer/ 70% Ayakulik Sockeye	98,671/230,234	82,134/191,647	22,816/53,238

Alitak District Seiners Harvest	66,942	55,537	24,579
50% Frazer/ 50% Ayakulik Sockeye	33,471/33,471	27,768/27,768	12,289/12,289
60% Frazer/ 40% Ayakulik Sockeye	40,165/26,777	33,322/22,215	14,747/9,832
70% Frazer/ 30% Ayakulik Sockeye	46,859/20,083	38,875/166,62	17,205/7,374

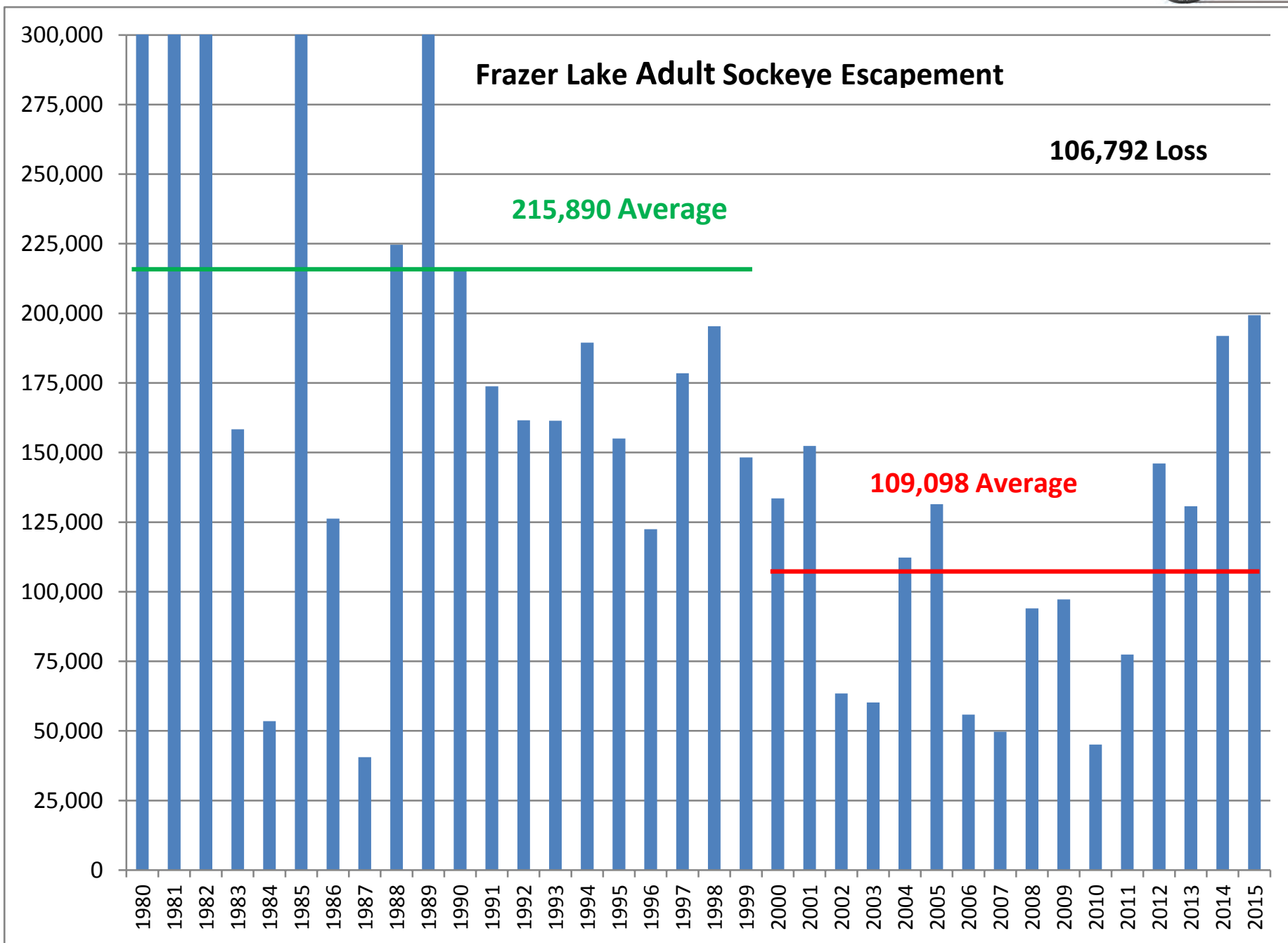
Data in this document was used from the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016 and Kodiak Management Area Salmon Escapement and Catch Sampling Results, 2014 - 2016

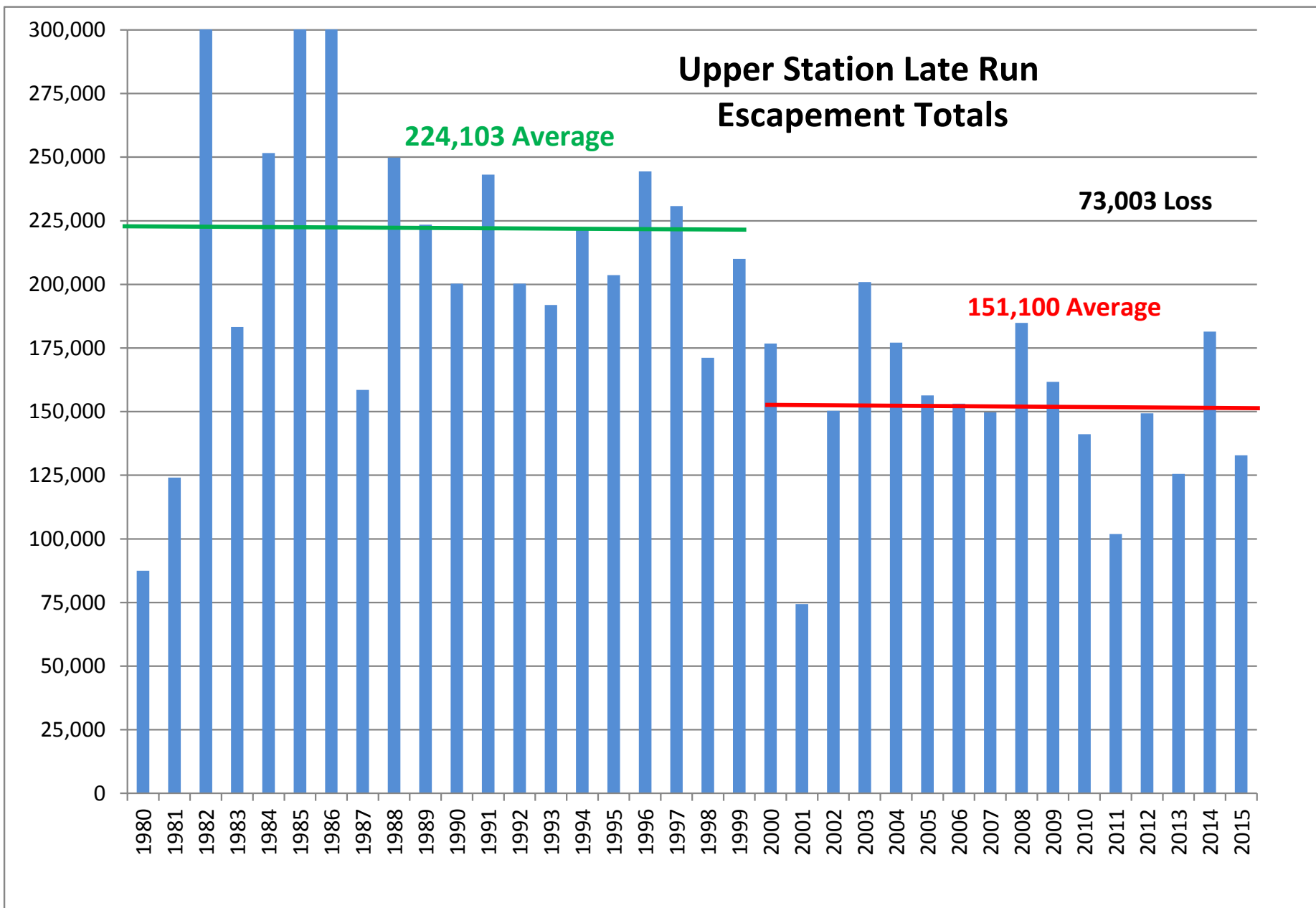




## Exvessel Value. 5 Year Average

	Purse Seine	Alitak Gillnet	Westside Gillnet
1985	\$57,782	\$39,538	\$21,273
1986	\$92,693	\$81,320	\$48,721
1987	\$79,812	\$46,115	\$31,068
1988	\$252,388	\$106,415	\$67,383
1989 <sup>b</sup>	\$10,555	\$149,702	\$0
<b>Average</b>	<b>\$98,646</b>	<b>\$84,618</b>	<b>\$33,689</b>
1990	\$111,524	\$65,168	\$58,062
1991	\$65,445	\$57,728	\$36,596
1992	\$97,917	\$27,009	\$48,791
1993	\$95,375	\$28,164	\$51,052
1994	\$67,701	\$45,739	\$43,971
<b>Average</b>	<b>\$87,592</b>	<b>\$44,762</b>	<b>\$47,694</b>
1995	\$135,605	\$60,102	\$70,204
1996	\$70,737	\$52,270	\$51,769
1997	\$55,390	\$28,989	\$44,839
1998	\$119,512	\$49,120	\$52,706
1999	\$109,243	\$35,730	\$72,482
<b>Average</b>	<b>\$98,097</b>	<b>\$45,242</b>	<b>\$58,400</b>
2000	\$71,536	\$21,989	\$47,500
2001	\$78,114	\$15,356	\$35,445
2002	\$68,552	\$0	\$26,158
2003	\$79,869	\$10,927	\$43,006
2004	\$93,942	\$29,814	\$43,211
<b>Average</b>	<b>\$78,403</b>	<b>\$15,617</b>	<b>\$39,064</b>
2005	\$129,181	\$26,468	\$50,395
2006	\$150,318	\$6,100	\$51,895
2007	\$148,355	\$7,896	\$60,347
2008	\$148,605	\$50,286	\$38,234
2009	\$174,661	\$48,660	\$46,854
<b>Average</b>	<b>\$150,224</b>	<b>\$27,882</b>	<b>\$49,545</b>
2010	\$130,009	\$11,955	\$35,424
2011	\$224,349	\$24,637	\$35,883
2012	\$219,164	\$28,193	\$67,771
2013	\$304,105	\$21,827	\$75,751
2014	\$198,521	\$27,920	\$78,672
<b>Average</b>	<b>\$215,230</b>	<b>\$22,907</b>	<b>\$58,700</b>

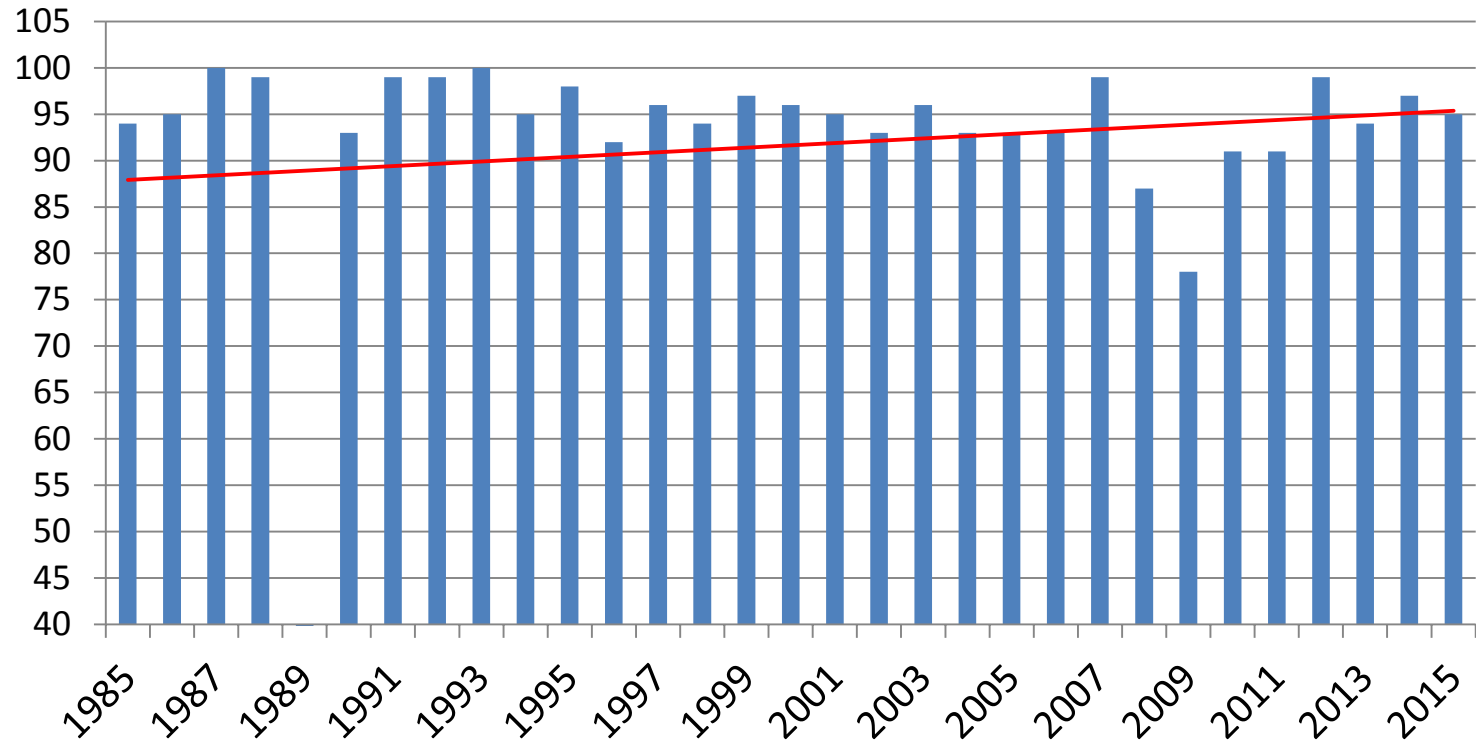




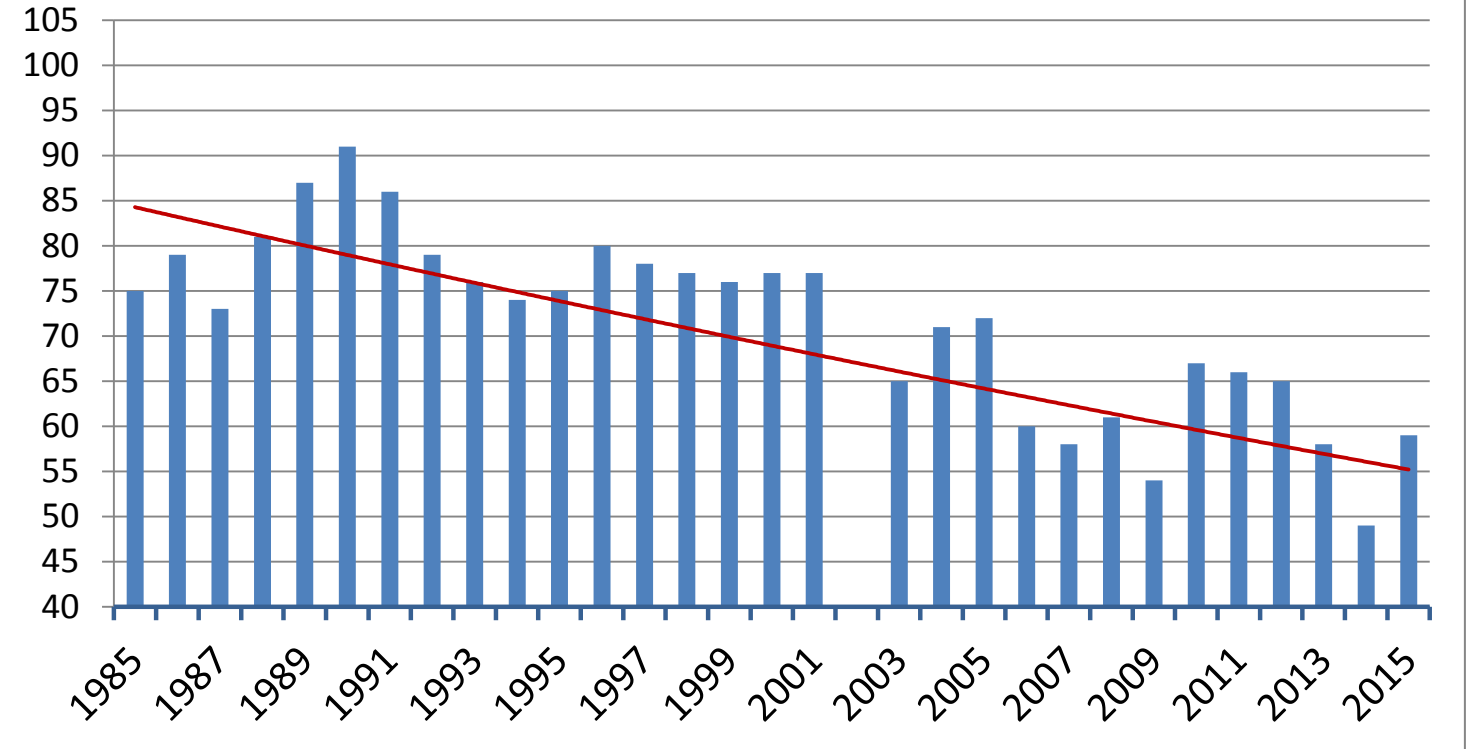




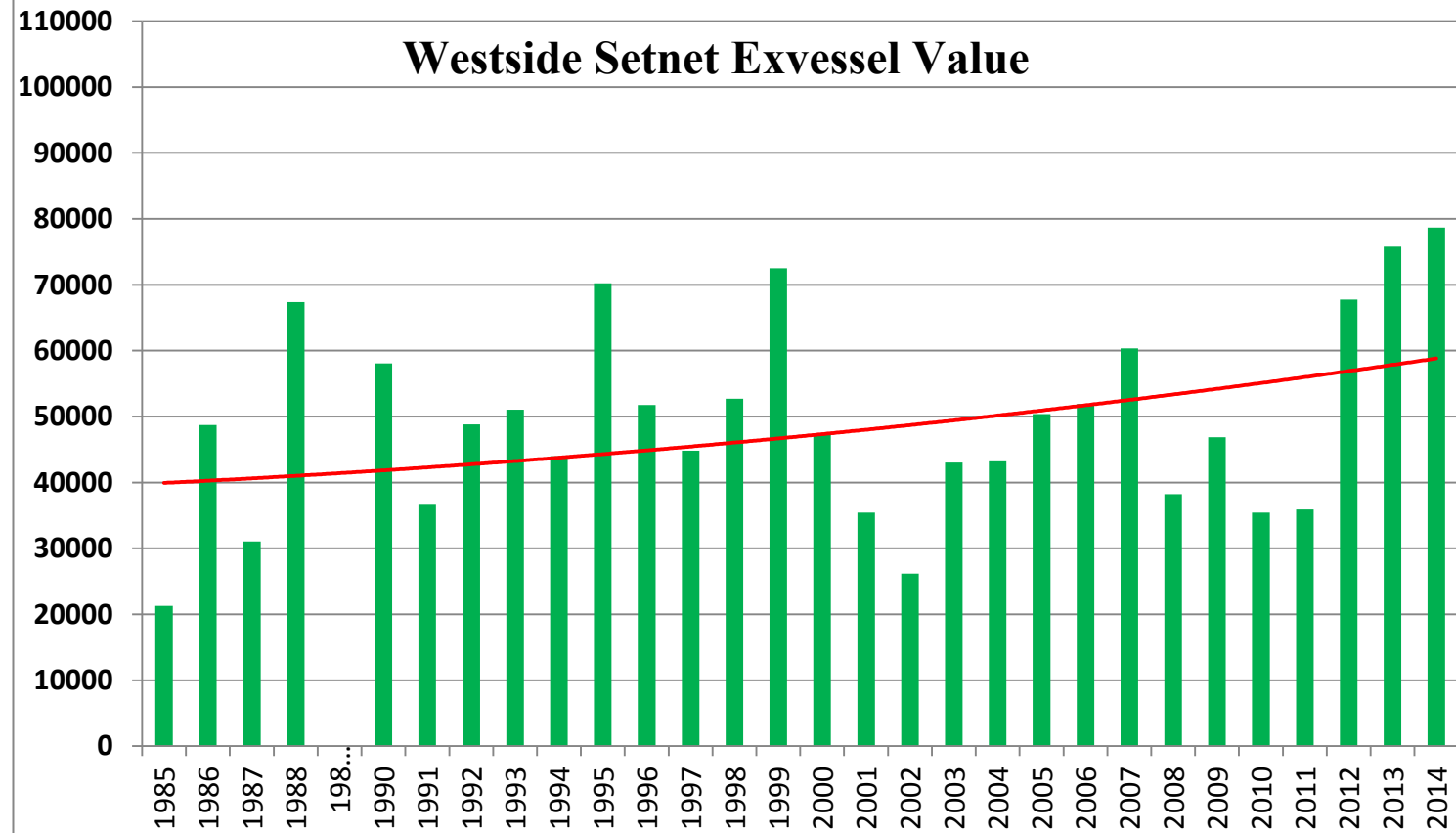
### Westside Setnet Permits Fished



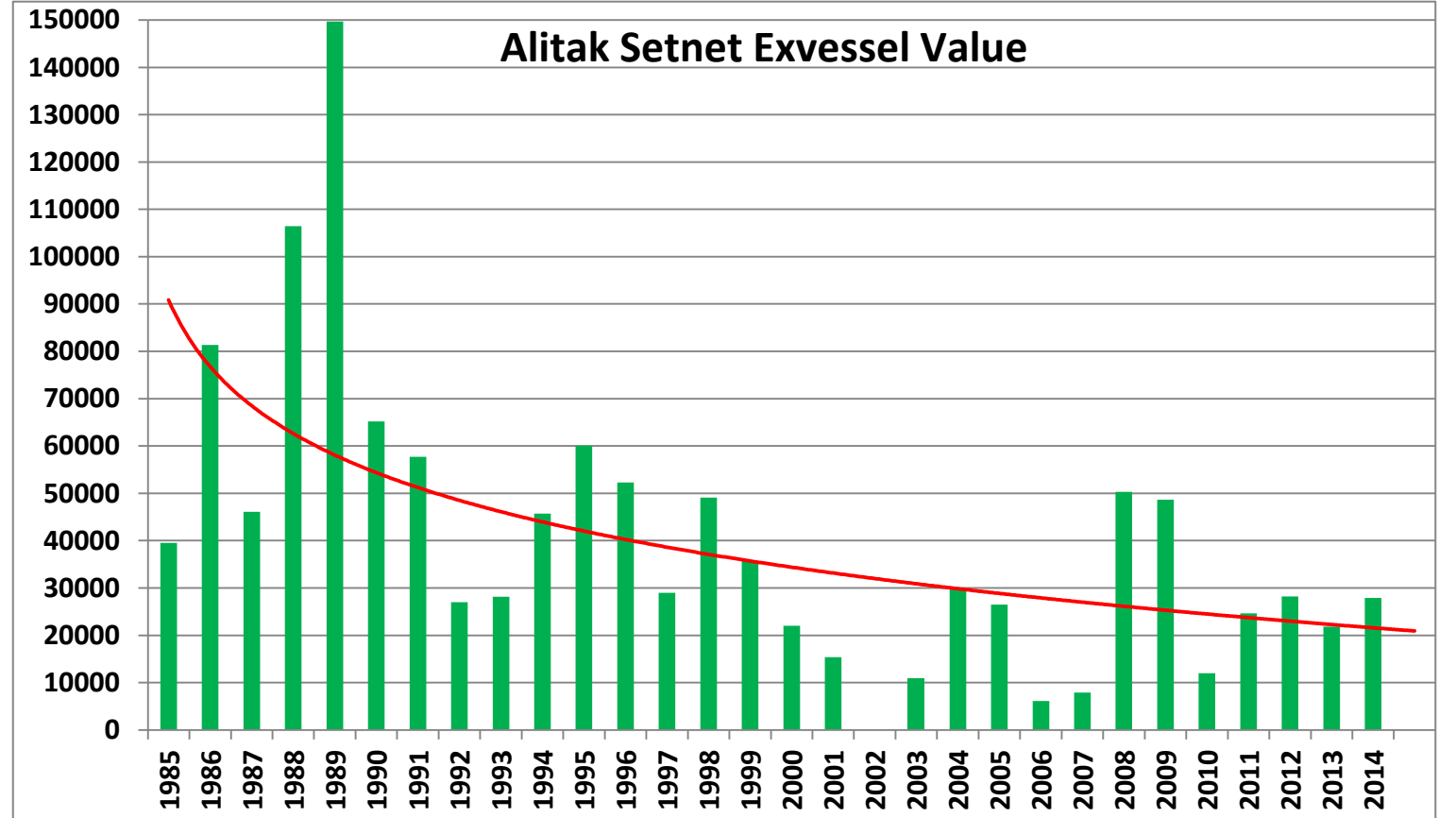
### Alitak Setnet Permits Fished



### Westside Setnet Exvessel Value

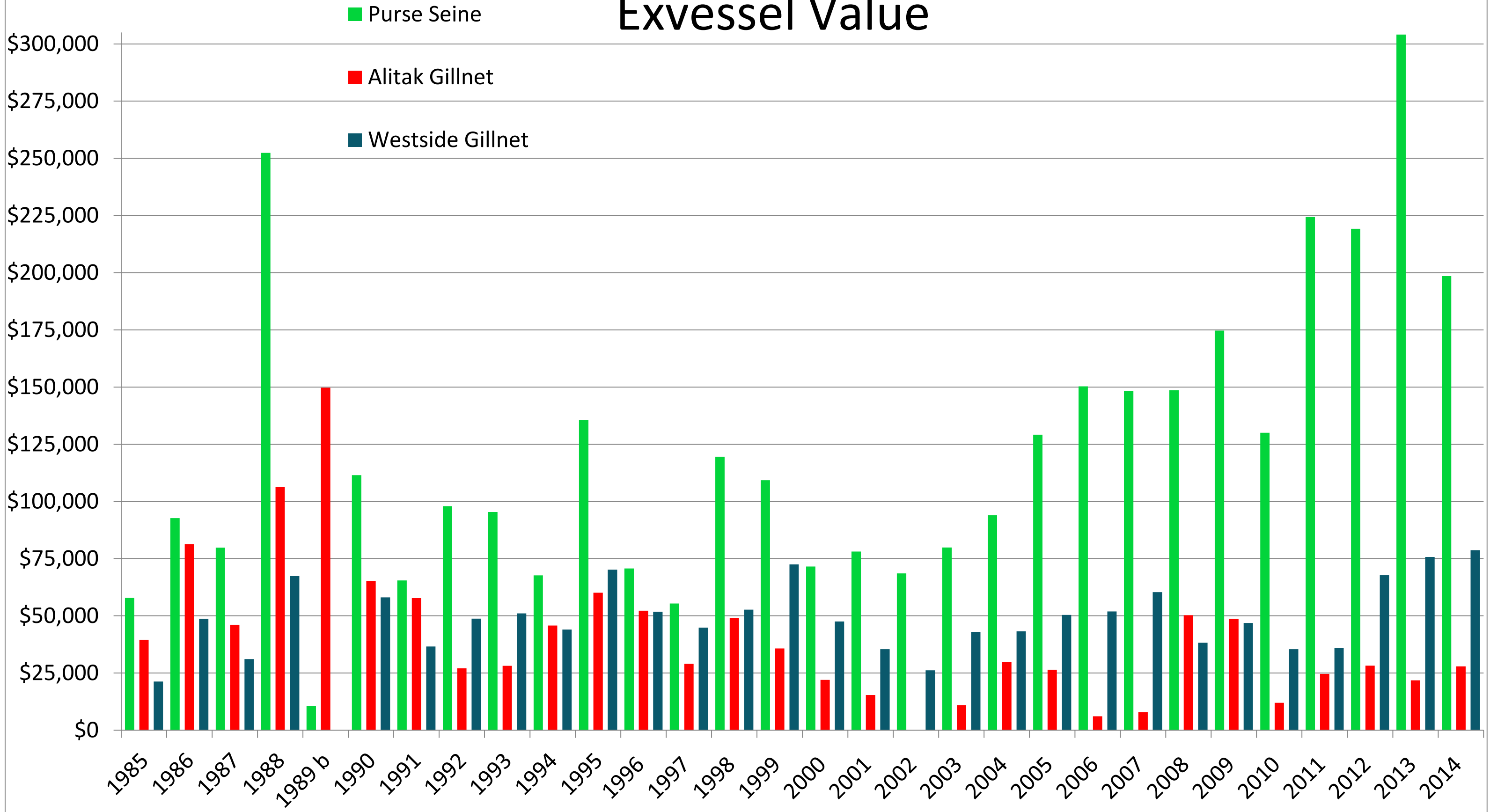


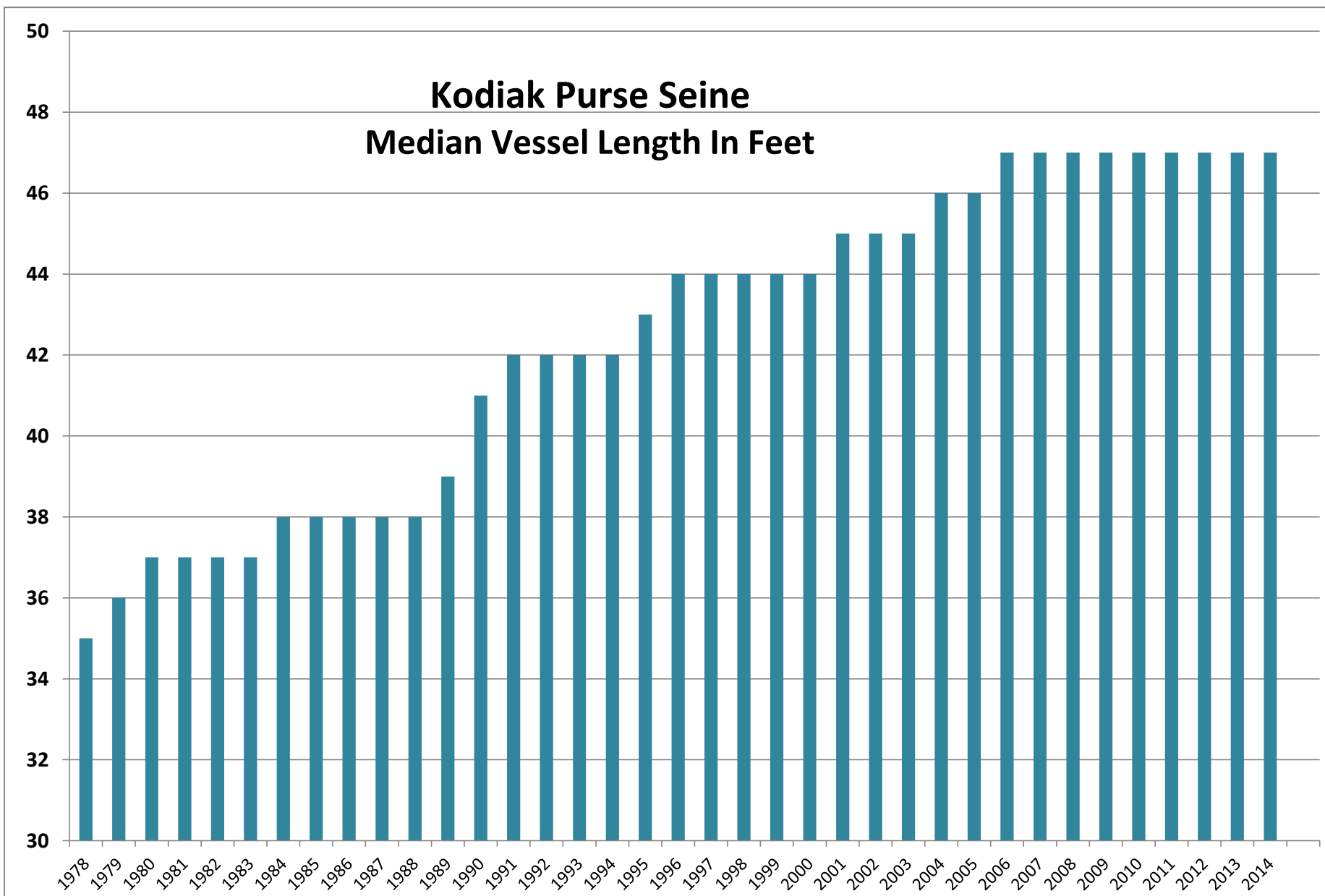
### Alitak Setnet Exvessel Value





# Exvessel Value







Frazer 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
25,000	105,944	4.24	80,944
50,000	182,151	3.64	132,151
75,000	234,883	3.13	159,883
100,000	269,226	2.69	169,226
125,000	289,304	2.31	164,304
150,000	298,444	1.99	148,444
175,000	299,320	1.71	124,320
200,000	294,073	1.47	94,073
225,000	284,403	1.26	59,403
250,000	271,656	1.09	21,656
275,000	256,885	0.93	-18,115
300,000	240,910	0.80	-59,090
325,000	224,359	0.69	-100,641
350,000	207,709	0.59	-142,291
375,000	191,314	0.51	-183,686
400,000	175,429	0.44	-224,571
425,000	160,235	0.38	-264,765
450,000	145,851	0.32	-304,149
475,000	132,348	0.28	-342,652

Upper Station early run 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
10,000	35,660	3.57	25,660
20,000	65,554	3.28	45,554
30,000	90,382	3.01	60,382
40,000	110,768	2.77	70,768
50,000	127,267	2.55	77,267
60,000	140,375	2.34	80,375
70,000	150,531	2.15	80,531
80,000	158,128	1.98	78,128
90,000	163,514	1.82	73,514
100,000	166,995	1.67	66,995
110,000	168,845	1.53	58,845
120,000	169,304	1.41	49,304
130,000	168,586	1.30	38,586
140,000	166,877	1.19	26,877
150,000	164,343	1.10	14,343
160,000	161,128	1.01	1,128
170,000	157,359	0.93	-12,641
180,000	153,146	0.85	-26,854



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Upper Station late run 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
20,000	94,696	4.73	74,696
40,000	180,136	4.50	140,136
60,000	256,996	4.28	196,996
80,000	325,913	4.07	245,913
100,000	387,480	3.87	287,480
120,000	442,249	3.69	322,249
140,000	490,738	3.51	350,738
160,000	533,431	3.33	373,431
180,000	570,778	3.17	390,778
200,000	603,199	3.02	403,199
220,000	631,088	2.87	411,088
240,000	654,810	2.73	414,810
260,000	674,705	2.60	414,705
280,000	691,090	2.47	411,090
300,000	704,262	2.35	404,262
320,000	714,496	2.23	394,496
340,000	722,046	2.12	382,046
360,000	727,152	2.02	367,152
380,000	730,033	1.92	350,033

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		harvest estimate	151	
Early-run Karluk	BEG: 110-250	Early-run forecast	294	200-387
		Early-run escapement	180	
		Early-run harvest estimate	114	
		<hr/>		
Late-run Karluk	BEG: 170-380	Late-run forecast	814	618-1,011
		Late-run escapement	275	
		Late-run harvest estimate	539	
		<hr/>		
Total Karluk		Total Karluk run forecast	1,108	818-1,399
		Total Karluk escapement	455	
		Total Karluk harvest estimate	653	
		<hr/>		
Early-run Upper Station	BEG: 43-93	Early-run forecast	125	69-182
		Early-run escapement <sup>a</sup>	65	
		Early-run harvest estimate	60	
		<hr/>		
Late-run Upper Station	BEG: 120-265	Late-run forecast	215	101-328
		Late-run escapement	186	
		Late-run harvest estimate	29	
		<hr/>		
Frazer Lake	BEG: 75-170	Forecast	237	113-361
		Escapement <sup>b</sup>	137	
		Harvest estimate	100	
		<hr/>		
Total Alitak District		Total Alitak run forecast	577	283-870
		Total Alitak escapement	388	
		Total Alitak harvest estimate	189	
		<hr/>		

-continued-

2

2017 Total Alitak District Harvest estimate is 189,000 for 3 sockeye runs →

Why is this preseason harvest prediction so far off from the return per spawner theoretical yield information for the Alitak District??

As you can see from the R/S chart I have supplied we should be getting a Harvest of 575,424 sockeye in the Alitak District for the season.

The difference between their R/S predictions and their Season Forecast is 386,424 sockeye.

Every season there is a huge difference between the harvest information on these two documents that Kodiak ADFG supplies to the fishermen.

At what point are they going to realize that their science is bad and their escapement goals are to low, or there is a major interception issue taking place?

At what point is ADFG going to take some responsibility and do something about the issue?

385,000 sockeye missing every year? Wouldn't you say this should raise a red flag?

This just goes to show the lack of concern the department has for their management of the fishery and their stewardship of the runs.

-Eric Dieters



Erik Obrien  
1518 Hidden Lane  
Anchorage AK 99501  
907-317-0428

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

October 3, 2017


Re: Oppose UCIDA AJR to Manage KMA for Cook Inlet Interests

Chairman Jensen:

Factors of success: in business require managing uncertainty; for cultural sustainability require protection from external interests; for participation in commercial fisheries requires access to resources; for sustained salmon returns requires data driven science. The UCIDA request to base Kodiak Management Area decisions on the special interests of external stakeholders, in a politically driven and allocative grab at resources, compromises each of the above considerations and livelihoods of Kodiak fishermen.

Our long history of marine dependence led my parents to Kodiak before my arrival, where they bought into setnet fishing on Kodiak's Westside. The stories that came with setnet fishing in Uyak bay, and the old fish processing cannery still operating in Larsen Bay, go back more than 100 years, and a cultural connection to salmon much longer. Some of the earliest commercial fishing businesses in Alaska were established here based on the reliability of salmon returning to Westside Kodiak in volume and regularity. This sustainability was temporarily interrupted when outside interests and common pool resource strain nearly led to the collapse of salmon runs prior to Alaska Statehood; however, with State control bestowed on local managers, salmon runs to Kodiak are as robust and strong as ever. The local management team has perfected this science over the 50 plus years it has been under their, and the Kodiak community's reliance to protect that resource, in good years and bad.

I urge you to consider everything at stake, and all that could be lost if the local ability to manage salmon systems is politicized, and science gives way to greed. Kodiak needs to maintain management of our fish stocks, and Cook Inlet needs to manage their own resources independent of where salmon travel in the open ocean before returning home. The precedence of breaking this trust could reverberate to fisheries around the state, upending many more lives than just those living in Kodiak.

  
Erik Obrien



Greetings Ms Pilcher,

I am writing to express my opposition to ACR01 which seeks to undo the 3-mile restriction on subsistence Northern Pike fishing in the Chatanika River near the mouth of Goldstream Creek which was recently expanded by the Board of Fisheries. The closed area was expanded to 3-miles in order to protect larger fecund female Northern Pike that overwinter in this area of Goldstream Creek and the Chatanika River. It seems prudent to leave the approved 3-mile restriction in effect long enough so that any effects on the Northern Pike population could be measured by the ADF&G. The larger closed area has only been in effect for one year and I believe that it would take several more years for beneficial effects of the closure to be observed in the affected population.

I would therefore ask that the Alaska Board of Fisheries not approve ACR01.

Sincerely,

Fred DeCicco  
Fisheries Biologist retired  
1171 Albro Gregory Lane  
Faribanks, Alaska 99712



Chair John Jensen  
AK Board of Fish  
Boards Support  
PO Box 115526  
Juneau, Ak 99811-5526

Sept 29,2017                      ACR #11-    OPPOSED

My name is Garrett Kavanaugh. I am 19 years old and have lived in Kodiak my entire life. I have worked as a crewmember on a Kodiak Salmon boat since 2001. For the past two and half years, I've crewed year-round fishing P cod from Fall to early Spring and salmon during the Summers. For the past 12 months, I have been actively seeking to purchase a S01K salmon permit & seiner to operate in Kodiak waters. The UCIDA agenda change request (ACR 11) has created drastic uncertainty for Kodiak Salmon Fisherman. I have decided to pause my intent to purchase a boat or permit. I am now looking into leasing a Washington Coast Dungeness permit and using our family's salmon seiner the Sylvia Star for that purpose. All I hear about is the support for young fishermen in Alaska. Kodiak, with the lowest valued permit, makes it the only truly entry level salmon fishery in the State. It is a long scratch fishery and is suited for smaller vessels more financially accessible to young fisherman. This proposal creates such uncertainty that I am unable to write a business plan for salmon fishing in Kodiak that would be acceptable to a financial institution. We are currently rigging the boat for P-cod fishing and would happy to answer any questions on how ACR 11 has and will negatively affect me personally.

A handwritten signature in black ink that reads "Garrett Kavanaugh".

Garrett Kavanaugh

Kodiak Alaska 99615

(907)942-0056



## **GOLDEN KING CRAB COALITION**

**Linda Kozak – Consultant**

**P. O. Box 2684 – Kodiak, Alaska 99615**

**Office 907-486-8824 – Cell 907-539-5585**

Date: October 2, 2017

To: Mr. John Jensen, Chairman  
Alaska Board of Fisheries

From: Linda Kozak

Subject: Agenda Change Request #2

The members of the Golden King Crab Coalition would like to support Agenda Change Request #2, which was submitted by the Aleutian King Crab Research Foundation.

This ACR requests the Board to consider an issue out of cycle which pertains to the development and adoption of a fishery management strategy for the Aleutian Islands golden king crab fishery. This management strategy is only possible now that a stock assessment model has been adopted for use in setting overfishing limits and allowable biological catch rates for this fishery.

The brief history of this issue is that a total allowable catch (TAC) was set by the Department in 1996 and was adjusted twice by Board action in previous years. These harvest limits are not based on a stock assessment model, as one had not been accepted for use in the fishery until this year. The model has been under development for many years and, unfortunately, was not adopted in time for a harvest strategy to be considered by the Board during the regular cycle.

We believe the ACR meets the criteria. Only by having a harvest strategy based on the stock assessment model and other considerations, will the department have the ability to truly manage the fishery based on conservation. This will allow the best available information to be used in setting the TAC, rather than a Board adopted catch limit. This issue should be addressed as soon as possible, rather than waiting for the normal cycle for this fishery.

Thank you for reviewing our comments.



Submitted By  
Greg Johnson  
Submitted On  
9/24/2017 11:41:38 AM  
Affiliation

Phone  
907-399-6236

Email  
[Steadfastgreg@gmail.com](mailto:Steadfastgreg@gmail.com)

Address  
Po box 52  
50910 mountain glacier ct  
Homer, Alaska 99603

I have been a seiner in kodiak for the last 25 years. Before that I spent my youth on a set net site in the northern district of Cook Inlet. I feel that the kodiak management plan should be left alone. First of all you can not create a solid management plan off only several years of data. For example I was in the cape igvak section in 2016 when a large percentage of Cook Inlet fish where harvested. That has never happened before. There was a 45 - 60 knot storm and large tides that happened to move fish into our area like no one had ever seen in the history of our fishery. It can never be predicted in any given year exactly where Cook Inlet bound fish will show up. That is left to Mother Nature and some years they do not show at all. Salmon are a public resource. They do not belong to one user group. Should we shut down Cook Inlet because they intercept Susitna river fish? Let's make reasonable management decisions and not open a can of worms with this whole genetic study. What will we do, over escape kodiak rivers because of the chance a Cook Inlet bound fish may be caught? Sounds like a management nightmare for fish and game and will have huge economic impact on us kodiak fishermen who will loose more fishing time and areas. Thank you , Greg Johnson.





Submitted By  
Harvey Goodell  
Submitted On  
9/30/2017 8:31:54 AM  
Affiliation

Chairman John Jensen and Board Members,

Alaska Board of Fisheries

RE: ACR 11 UCIDA Request to change Kodiak Salmon Management Plan.

I Harvey Goodell oppose the Board of Fisheries taking up ACR 11 out of cycle. I do not believe the new genetic stock study offers any new information. And changing the management plan for Kodiak Salmon would have considerable negative effects to the fleet and local Kodiak community.

My family and I just finished our 18th season setnetting salmon in Uganik Bay on the west side of Kodiak Island. We rely on harvesting salmon during the time frame June 23rd - July 31st. Our fishing periods are based on the preseason forecast of our local stocks. If ACR 11 was implemented it would re-allocate salmon to the seine fleet. The fleet would be forced to the inner bays where the setnet fleet is restricted.

Having lived in Alaska and on Kodiak Island for 37 years and been involved in the fishing business for all those years. First in the processing industry and for the past 35 years in the fishing industry. The importance for Kodiak Salmon Fisherman to harvest the historic salmon catch is very important to the Kodiak Island community.

ACR 11 does not meet the criteria that warrants a change for an out of cycle board meeting.

Sincerely yours,

Harvey Goodell



Chairman John Jensen  
Alaska Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526

Chairman Jensen and Board Members:

I am opposed to the UCIFA agenda change request.

I am a second generation Kodiak Area Salmon seiner. My first trip was 50 years ago with my Dad as an 11-year-old. Prior to area registration my Dad fished salmon in Kodiak, Chignik and Cook Inlet.

I began operating my own seiner in 1980. Salmon fishing accounts for 80% of my income.

Salmon are considered "COMMON PROPERTY" and do not belong to the users of a specific management area. Purchasing a permit for a given area allows the permit holder to harvest fish in that area. It does not "guarantee" the permit holder will catch fish and does not give "ownership" of the fish returning to the area to the permit holder. Catching fish, in compliance with state regulation, gives the permit holder the right to sell the catch (ownership) and hopefully make a profit.

Salmon bound for Cook Inlet rivers have, and always will travel thru the Kodiak management area just as fish bound Kodiak travel thru areas L and M.

Before the BOF alters an historical management plan based on a singular genetic study it is only equitable that the State of Alaska conduct statewide genetic studies.

Respectfully,

James R Horn  
F/V Venturess  
1776 Mission Rd Kodiak, AK 99615



Submitted By  
james monroe  
Submitted On  
10/3/2017 11:29:09 PM  
Affiliation  
fisherman/vessel owner

Phone  
9074863656  
Email  
[whitnecreek@gci.net](mailto:whitnecreek@gci.net)  
Address  
p.o. box 1202  
Kodiak, Alaska 99615

October 3,2017

RE: UCIDA AGENDA CHANGE REQUEST AND GENTIC STOCK COMPOSITION OF SOCKEYE SALMON IN THE KODIAK MANAGEMENT AREA.

CHAIRMAN JOHN JENSEN

As a fisherman, boat owner I oppose the UCIDA agenda change request because it does not meet the Board's agenda change criteria because Kodiak Management Area gentic stock composition study does not present any new information that corrects an effect on the fishery that was unforeseen when the regulation or management plan was adopted nor does Cook Inlet sockeye caught in the Kodiak Area create a conservation concern or have conservation purpose or reason. Therefore, there is no error in regulation that needs correcting.

As a fisherman, boat owner, I primarily fish Salmon on the West Side of Kodiak Island, and the Mainland in Shelikof Straits for the past 47 years.

I believe a more rigorous survey along with much more discussion should be done before any changes are made to any regulations or Management Plan.

All regulations should stay the same, until more research and a complete genetic stock composition over a longer period of time can be made. UCIDA agenda change request does not meet the Board of Fisheries Agenda Change Request Criteria..

Sincerely yours

James D. Monroe



Submitted By  
James Pryor  
Submitted On  
10/3/2017 2:47:07 PM  
Affiliation  
Alitak Set Net Association

ACR 11 Comments on a new management plan for sockeye management in the Kodiak Management Area. Our family has a set net operation in Olga Bay on the south end of Kodiak Island. We have fished in Olga Bay since 1994 and have seen a steady deterioration of sockeye returns to both the South Olga Lakes (Upper Station) and Fraser Lake. The current salmon management plan in the Kodiak area bears the responsibility for the decline in sockeye production and escapement. The Alitak District set net families have borne the entire burden of stock conservation with drastic curtailment of fishing opportunities and poor returns resulting extreme financial distress. We cannot support a status quo of the Kodiak Area Management plan. ACR 11 addresses the concern of Cook Inlet sockeye returns being intercepted in the Kodiak Management area. We also have concerns with interception of south bound sockeye headed to the Olga Bay terminal areas which the current management plan does very little to address. The interception of sockeye that are not Karluk bound in the Kodiak Management is larger than just Cook Inlet fish. ACR 11 addresses the interception of Cook Inlet sockeye with a cap proposal on catches. We feel this is probably not the best way to address the issue of sockeye interception as there is a traditional catch of migratory fish on Kodiak Island. There are less invasive ways to address the interception problem without a total shut down of Kodiak salmon fisheries. A more fair and equitable solution would be to institute a near shore fishery in the Northwest and Southwest management districts to relieve some of the pressure that 24-7 cape fisheries put on returning salmon traveling the migratory pathways of Kodiak. Another possible solution would be a pulse fishery for the entire island to insure that the full spectrum of sockeye runs that use the migratory pathways that are known to run along the shores of the Kodiak Management Area will have the opportunity to escape and the burden of conservation will be equally shared by all stakeholders.

In summation we are opposed to a status quo of the Kodiak Area Management plan as currently written. We are a Kodiak Island sockeye fishery that has been greatly harmed by the current management plan and would like to see changes that address the migratory pathways and share the burden of conservation of stocks that are not Karluk bound. The current management plan has made the sockeye fishery a monoculture based almost entirely on Karluk escapement with little relief from long openings that do harm to stocks on the south end of Kodiak. We do not support ACR11 as written but feel the Board of Fish can find a compromise position that will address the concerns of both the Cook Inlet stakeholders and the Alitak District fishermen. Status quo of the Kodiak Area Management plan is not a solution.



Jamin Price Hall  
PO Box 1662  
Kodiak, AK 99615

Chairman John Jensen  
Alaska Board of fisheries  
Boards Support ction  
PO Box 115526  
Juneau, AK 99811 5526

Re: UCIDA Agenda Change Request and  
Genetic Stock Composition Sockeye Salmon in  
The Kodiak Management area

I am writing to state my opposition to the request of agenda change b UCIDA. clearly does not meet the criteria for taking is issue up out f cycle because there is no new information that “corrects an effect on the fishery that was unforeseen when the regulation was adopted” Also, there is no particular conservation issue at stake; he incidental interception sockeye ound for cook inlet by Kodiak fishermen does not put the entire system at risk. The request is purely motivated by the desire for more money on the part of UCIDA, the expens of the entire Kodiak economy.

I first tarted fishing Kodiak 2005 as crew a set gill net site in Uganik Bay, on the est side of the island. continued o return in the summer for salmon season until 2011 when I got a job fishing pot cod around Kodiak and out the peninsula. I became an Alaska resident then and have made Kodiak my home ever since. I have fished in a number of other fisheries including crab and halibut. 2014 I bought a setnet site in Uganik, less than a mile from where I spent my first summer and have been salmon fishing there ever since. My fiancé grew up fishing with her parents in Uganik and now fishes with me at what is now our site. now ave a son who will grow up fishing with us. As Kodiak setnetters we do not, by in large have heavy st fishing; rely on a sustained fishery that lasts from the beginnin of June into September. Taking over a month of fishing time away from June 23<sup>rd</sup> to July 31<sup>st</sup> would have an enormous impact on us. Not only for sockeye, but for all the pinks and chum that we would be unable to fish for during that time. My family’ livelihood depends on being able to fish as we do throughout the summer.

The agenda change request is not reasonable on a number of levels. First, as stated earlier, it does not meet the boards agenda change criteria. It is motivated b the findings of a study that was undertaken for other reasons, and furthermore the study did not reveal any new information on a qualitative level. The study was ver small is scope and is not linked to any assessment of percentage of catch in any of the three areas targeted. Also, the request does not take into account the potentially disastrous effects on local stocks if fishing time was not being managed on local systems. Over escapement is a very real possibility and can have a huge negative



impact on the strength of future local runs. And finally, if the board decides to take up the issue, it sets a precedent in which any management area can be targeted for the incidental take of another area's fish. For instance, will the Chignik and Area M management areas be regulated for the harvest of Kodiak Sockeye and pinks?

The Kodiak Management area has not changed, it is an historical fishery that has not changed in physical area. Therefore, in the absence any information indicating that there is an imminent threat or conservation concern on Cook Inlet stocks, the management plan must continue to be based on local stocks.

The UCIDA agenda change request should be thrown out because it does not meet the Board of Fisheries Agenda Change Request criteria. Quite simply, the genetic stock composition study does not bring to light any new information, and the incidental take of Cook Inlet sockeye does not present a conservation concern for Cook Inlet stocks. Thank you for your thoughtful consideration of the matter;

Respectfully,  
Jamin Price Hall  
Naomi Beck Goodell  
Corwyn Goodell Hall





Jane Petrich  
PO Box 52  
Larsen Bay, Alaska 99624

October 3, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Re: UCIDA Agenda Change Request and Genetic Stock Composition of Sockeye Salmon in the Kodiak Management Area

To Whom It May Concern:

My name is Jane Petrich and I oppose the UCIDA agenda change request. The request does not meet the Board's Agenda Change Request Criteria because the Kodiak Management Area genetic stock composition study does not present any **new information** that **corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted**. Cook Inlet sockeye caught in Kodiak do not create a conservation concern or have conservation purpose or reason. Moreover, there is no error in regulation and or management that needs correcting.

I have fished the west side of Kodiak Island in Uyak and Larsen Bays since the late 1970's. Over the years as my family grew so did our fishing operation. Today my three children, two grandchildren and two daughter-in-laws all participate in our family operation. We have grown from a single permit operation in 1970 to a 6 permit operation in the 2017 season. We fish traditional sites which have been fished by the local people for many years. We rely heavily on strong salmon runs to provide for our families and crew, especially during the June 23 to July 31 portion of the Kodiak salmon fishery. There is no new information to consider. The fishery is well managed and the seasons ebb and fall as they always have.

I am deeply opposed to the agenda change request. The request infringes on a well managed and functioning area I believe it to be a terrible model which could completely disrupt one area's fishery to slightly advantage another area's harvest. Salmon are considered "common property" and do not "belong to" the management area where they were born. Further, if Kodiak is regulated for the presence of Cook Inlet sockeye, will the board also move to regulate Chignik and Area M for the take of Kodiak sockeye and pinks? Lastly, I do not believe the information gathered from the genetic testing done in a short three-year time period holds enough merit to move forward with changing the management for the pertaining areas permanently.



The Kodiak fishery is a historical fishery which has not moved into new areas. The Kodiak Management Plan is focused on the availability and harvest of local stocks and does not target Cook Inlet fish. The management plans are working based on the continued success of Kodiak fishermen and the salmon runs seen around the island.

In conclusion, I feel it important to restate that the UCIDA agenda change request does not meet the Board of Fisheries Agenda Change Request criteria. The Kodiak Management Area genetic stock composition study does not present any “new information” that “corrects an effect on the fishery that was unforeseen when the regulation (management plan) was adopted” nor does Cook Inlet sockeye caught in Kodiak create a conservation concern or have conservation purpose or reason. Moreover, there is no error in regulation that needs correcting.

Sincerely,

Jane Petrich  
[jpetrich@gci.net](mailto:jpetrich@gci.net)  
907 942-2724



Good Morning,

I would like to express my comments on the Regulation Change on The Minto Flats Northern Pike Management plan. The Proposed Regulation change is not acceptable as that area is a Critical Over wintering Spot for Female Northern Pike of That are capable of spawning. As a Guide and A business owner that operates in Minto Flats. This would be detrimental to many businesses as well as a other that is dependent on those spawning female to reproduce. I believe that the Data that the gentleman submits is limited and skewed to look like that this area is the only area to fish. Whereas there are many areas to fish this Subsistence fishery without endangering those spawning females. This is just the easiest to area to catch fish. This area has a Significant impact on the health of the whole of the Minto Fishery. Allowing the area to be reduce to one mile without proper enforcement would have a impact on the pike population. This is a State subsistence fishery area and Not a Traditional use area. This area has only been subsistence since the Mid 90's.

Jason Rivers



Jeff & Lauri Bassett  
5000 East 98th Avenue  
Anchorage, AK 99507

September 30, 2017

Chairman John Jensen  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: UCIDA Agenda Change Request and Genetic  
Stock Composition of Sockeye Salmon in the  
Kodiak Management Area

We oppose ACR 11 which has been put forward by UCIDA. ACR 11 does not meet the criteria for an agenda change request and should not be considered at this time. The genetic stock composition study on which the ACR is based, while being comprehensive, does not provide new information which has not already been addressed in previous board cycles. Secondly, Cook Inlet sockeye caught in the Kodiak Management Area is not a conservation concern. It is our contention that there is no error in the way Kodiak Management Area is currently managed.

We have been set netting on the west side of Kodiak since 2006 and this provides a large portion of our families' income. A majority of our fishing income is obtained in the period of time between June 23 and July 31 making this proposal a serious threat to our business and way of life.

We take issue with several aspects of this proposal. First, the data produced by the genetic stock composition study shows extreme variability, making it impossible to identify useful management trends. As pointed out by the third-party assessment of the report: "it is really impossible to establish a trend with only three years of data." They went on to say that when time is brought into the discussion, the situation "appears murky" and concluded that "this observed variation shows the danger in looking at just three years and thinking that one sees a trend. Further sampling and study is warranted to understand patterns of temporal variation." Our view is that it would be unconscionable to change the way the west side fishery has been managed based on an unrecognizable trends. Second, we have concern that this proposal does not take into account the management of the Karluk River. Kodiak management biologist would be unable to manage for over-escapement in the Karluk River. Third, the proposal does not take into account that the set net fishery is a non-mobile fishery. The allocation of the set net fleet will certainly drop at a greater rate than the seine fishery, as we are unable to move to another district if the west side Kodiak fishery is closed. Unlike the seine fleet which will seek fishing opportunities in other districts, we simply will not be able to fish. This will result in a disproportional drop in the set net allocation.

The current Kodiak Management Plan has developed over many years and focuses on the capture of local stocks while maintaining desired escapement numbers. We are fearful that changes to the plan will result in detrimental consequence to our local stocks. Further, in no way does the current management plan intend to target non-local fish.



In conclusion, ACR 11 should not be considered at this time as it does not meet the criteria for an agenda change request. Also, the data produced from the genetic stock composition study does not provide new information. Finally, the data has high variability; therefore making changes to the current plan would simply be guess work.