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January 8, 2019

Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

To the Board of Fisheries:

The Territorial Sportsmen, Inc. (TSI), a long-standing sportspeople's outdoor advocacy group based in Juneau, submits the following comments regarding Proposal 176:

We cannot emphasize any more strongly that the Southeast Alaska resident sport fishery for king salmon is a food fishery. There are no subsistence king salmon fisheries in Southeast except for the community of Klukwan on the Chilkat River. There are no personal use king salmon fisheries in Southeast. There are no freshwater sport fisheries for king salmon in Southeast; all systems are closed to taking king salmon. The only means for residents to take king salmon for their personal subsistence purposes is via the marine sport fishery.

For these reasons past boards have memorialized the importance of the resident king salmon fishery by putting into regulation the statements that the objectives of the management plan are to allow uninterrupted sport fishing in salt waters for king salmon while not exceeding the harvest ceiling, and to minimize regulatory restrictions on residents.

The proposed language in sections (g) and (h) of the amended management plan (proposal 176) violates the spirit and letter of both of these provisions.

Subsection (g) imposes a month-long closure in July for all sport fishermen, resident and nonresident, to save approximately 5,000 treaty fish. Subsection (h) adds the first half of August to that closure.

Of all the possible measures to save 5,000 sport caught king salmon, a month-long closure in July is the most disruptive to residents and is inconsistent with the management plan.

Listed below are several alternative measures that could save 5,000 treaty king salmon without such an adverse impact on resident fishermen. These are stand-alone measures listed in priority order to least affect residents.

1. Since nonresidents catch two-thirds of the sport catch and are the largest user of the sport allocation, open the nonresident king salmon sport fishery annually on the date when the nonresident fishery had normally harvested 5000 king salmon; OR
2. Close the nonresident king salmon fishery on June 1 and end the closure when 5000 treaty fish would normally have been caught by nonresidents in June; OR
3. The least desirable would be to provide a closure to all fishermen in June rather than July. The closure would be much shorter in duration than the proposed month of July, which would be less disruptive to the resident sport fishery, because considerably more fish are caught in June than July.

An early nonresident closure, or a June nonresident closure would allow the resident sport fishery to remain open rather than closing. A sport closure in July would result in the sport fishery being closed while the commercial troll and net fisheries would be open; this scenario is potentially disruptive and is not necessary with either an early nonresident closure, or an early June closure for nonresidents or, as a last resort, for all sport fishermen.

These are all short-term stopgaps. The depressed Southeast king salmon stocks and the present management schemes have created a disproportionate and negative impact on resident king salmon fishermen. At these low levels, it is apparent that the Board needs to now consider separate regulations for inside and outside waters king salmon fishing allocations and opportunities. In the interim, we advocate for the minimum impact on resident fishermen throughout the region.

TSI appreciates your consideration of our views.

Sincerely,



Matthew H. Robus, President  
Territorial Sportsmen, Inc.

	2016	2016	2017	2017	2018	2018		
Management (SWHS) Area	Resident	Nonresident	Resident	Nonresident	Resident	Nonresident	Resident Average	Nonresident Average
Ketchikan	2,780	2,960	1,679	4,705	2,266	3,799	2,242	3,821
Craig-POW	2,719	12,393	2,113	9,380	855	3,847	1,896	8,540
Petersburg-Wrangell	3,425	3,472	2,062	2,141	420	431	1,969	2,015
Sitka	8,572	25,102	7,582	15,979	2,522	6,228	6,225	15,770
Juneau	2,579	1,289	2,411	621	1,824	671	2,271	860
Haines-Skagway	100	15	0	0	0	0	33	5
Glacier Bay	367	1,634	556	2,023	259	1,041	394	1,566
Yakutat	359	581	170	884	154	412	228	626
<b>Total</b>	<b>20,901</b>	<b>47,446</b>	<b>16,573</b>	<b>35,733</b>	<b>8,300</b>	<b>16,429</b>		

2018 harvest estimates are preliminary and will be adjusted in the fall of 2019 after the final SWHS estimates are produced; these preliminary estimates are considered to be a reasonable approximation of harvest by management area and residency

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	2016	2016	2017	2017	2018	2018		
Timeframe	Sport Harvest	Troll Harvest	Sport Harvest	Troll Harvest	Sport Harvest	Troll Harvest	Sport Average	Troll Average
January	10	4,798	10	1,849	10	1,400	10	2,682
February	10	11,882	10	3,845	10	1,709	10	5,812
March	10	6,249	10	6,591	10	1,460	10	4,767
April	1,300	2,569	150	25,031	165	32	538	9,211
May	15,300	13,601	7,860	5,314	2,770	1,865	8,643	6,927
June	29,200	26,514	22,900	13,193	10,900	6,388	21,000	15,365
July	10,600	106,747	13,900	67,250	6,360	59,571	10,287	77,856
August	4,500	63,064	4,700	3	4,130	27,742	4,443	30,270
September	300	11,715	10	0	370	0	227	3,905
October	10	3,603	10	4,145	10	3,165	10	3,638
November	10	1,482	10	1,644	10	1,799	10	1,642
December	10	1,513	10	1,609	10	588	10	1,237
Total	61,260	253,737	49,580	130,474	24,755	105,719		

sport harvest occurring in the shoulder seasons before and after the SEAK creel program is running is very small, representing about 1% of the entire harvest. The use of "10" for the time periods January - March and October - December are just placeholders or proxies for a very small number that is unknown.

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Table 4.—Sport harvest of treaty king salmon and sport overage/underage calculations using allocations based on preseason abundance indices, 1999–2019.

Year	Preseason abundance index	Winter Troll CPUE	Preseason allowable catch	Troll + sport preseason allowable catch	Preseason troll allocation	Preseason sport allocation	All-gear observed catch	Troll catch	Sport harvest	Troll deviation (preseason)	Sport deviation (preseason)	Troll (%) <sup>a</sup>	Sport (%) <sup>b</sup>
1999	1.15		192,800	177,918	142,335	35,584	198,842	132,741	53,158	-9,593	17,574	74.6	29.9
2000	1.14		189,900	175,227	140,182	35,045	186,493	133,963	41,439	-6,219	6,394	76.5	23.6
2001	1.14	8.25	189,900	175,227	140,182	35,045	186,919	128,692	44,725	-11,490	9,680	73.4	25.5
2002	1.74	16.88	356,500	329,832	263,866	65,966	357,133	298,132	45,504	34,266	-20,462	90.4	13.8
2003	1.79	20.44	366,100	338,741	270,993	67,748	380,152	307,380	49,239	36,387	-18,509	90.7	14.5
2004	1.88	8.03	383,500	354,888	283,910	70,978	417,019	321,876	55,413	37,965	-15,565	90.7	15.6
2005	2.05	8.3	416,400	385,419	308,335	77,084	388,640	304,891	63,330	-3,444	-13,753	79.1	16.4
2006	1.69	10.26	346,800	320,830	256,664	64,166	360,094	263,980	69,375	7,315	5,209	82.3	21.6
2007	1.6	3.43	329,400	304,683	243,747	60,937	328,268	240,474	62,298	-3,273	1,361	78.9	20.4
2008	1.07	2.34	170,000	156,760	125,408	31,352	172,905	126,352	32,603	944	1,251	80.6	20.8
2009	1.33	3.46	218,800	202,046	161,637	40,409	227,954	159,126	48,120	-2,511	7,711	78.8	23.8
2010	1.35	4.34	221,800	204,830	163,864	40,966	230,611	177,982	44,315	14,118	3,349	86.9	21.6
2011	1.69	6.17	294,800	272,574	218,060	54,515	291,161	220,787	53,964	2,728	-551	81.0	19.8
2012	1.52	5	266,800	246,590	197,272	49,318	242,821	191,553	37,722	-5,719	-11,596	77.7	15.3
2013	1.2	4.4	176,000	162,328	129,862	32,466	191,388	134,580	43,304	4,718	10,839	82.9	26.7
2014	2.57	7.44	439,400	406,763	325,411	81,353	435,195	340,015	73,951	14,605	-7,401	83.6	18.2
2015	1.45	13.43	237,000	218,936	175,149	43,787	335,026	251,086	65,174	75,937	21,387	114.7	29.8
2016	2.06	11.12	355,600	328,997	263,197	65,799	350,704	266,048	59,442	2,850	-6,358	80.9	18.1
2017	1.27	4.21	209,700	193,602	154,881	38,720	175,414	123,691	44,125	-31,190	5,405	63.9	22.8
2018 <sup>c</sup>	1.07	3.58	144,500	133,096	106,477	26,619	128,623	101,630	21,327	-4,847	-5,293	76.4	16.0
2019 <sup>c</sup>	<sup>d</sup>	3.36	140,323	129,220	103,376	25,844							
Average													
2014–2018			277,240	256,279	205,023	51,256	284,992	216,494	52,804	11,471	1,548	83.9	21.0
2009–2018			256,440	236,976	189,581	47,395	260,890	196,650	49,144	7,069	1,749	82.7	21.2
a	Troll (%), which has a target of 80%, is calculated by dividing "troll catch" by the combined "troll + sport preseason allowable catch" for any given year.												
b	Sport (%), which has a target of 20%, is calculated by dividing "sport harvest" by the combined "troll + sport preseason allowable catch" for any given year.												
c	Preliminary estimates												
d	currently unavailable												

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**Harvest Timing by Angler Type (as a proxy for residency) based on 2011 - 2018 (average) observed pattern**

Timeframe	Private	Chartered	All Harvest
January 1 - April 24	< 1%	< 1%	< 1%
April 25-May 8 (Biweek 9)	3%	0%	1%
May 9-22 (Biweek 10)	12%	5%	7%
May 23-June 5 (Biweek 11)	26%	12%	17%
June 6-19 (Biweek 12)	20%	21%	21%
June 20-July 3 (Biweek 13)	19%	22%	21%
July 4-17 (Biweek 14)	8%	13%	11%
July 18-31 (Biweek 15)	5%	12%	9%
August 1-14 (Biweek 16)	5%	10%	8%
August 15-28 (Biweek 17)	2%	5%	4%
August 29-September 11 (Biweek 18)	0%	1%	1%
September 12-December 31	< 1%	< 1%	< 1%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

**Harvest Timing by Angler Type (as a proxy for residency) 2016 - 2018**

Timeframe	2016	2016	2017	2017	2018	2018
	Private	Charter	Private	Charter	Private	Charter
January - April 24	< 1%	~ 0%	< 1%	~ 0%	< 1%	~ 0%
April 25-May 8 (Biweek 9)	3%	0%	1%	0%	2%	0%
May 9-22 (Biweek 10)	13%	5%	7%	4%	5%	2%
May 23-June 5 (Biweek 11)	36%	16%	24%	10%	14%	11%
June 6-19 (Biweek 12)	21%	27%	29%	22%	20%	15%
June 20-July 3 (Biweek 13)	17%	23%	19%	24%	29%	23%
July 4-17 (Biweek 14)	4%	10%	11%	17%	11%	11%
July 18-31 (Biweek 15)	3%	8%	5%	13%	7%	11%
August 1-14 (Biweek 16)	2%	6%	4%	10%	5%	13%
August 15-28 (Biweek 17)	0%	3%	0%	0%	6%	10%
August 29-September 11 (Biweek 18)	0%	2%	0%	0%	1%	3%
September 12 - December 31	< 1%	< 1%	< 1%	< 1%	< 1%	< 1%

**Greater than 95% of the chartered harvest is by nonresidents**

**Approximately 33% of the private harvest is by nonresidents**

This panel shows the new management tiers, CPUE ranges, sport allocation and sport prescriptions associated with Proposal 176

Tier	CPUE based Tier	Sport Allocation	Resident Bag	Nonresident Bag	Nonresident Annual	Non-retention Periods	Two Rods
C	20.5 and greater	69,000	3	2 May - 1 Remainder	5	NO	All Anglers
D	8.7 to less than 20.5	61,900	3	1	4	NO	All Anglers
E	6.0 to less than 8.7	49,300	2	1	3	NO	All Anglers
F	3.8 to less than 6.0	37,900	1	1	(Jan 1 - June 15 = 3); (June 16 - Dec 31 = 1)	NO	Resident Anglers
G	2.6 to less than 3.8	25,800	1	1	(Jan 1 - June 15 = 3); (June 16 - June 30 = 1); (July 1 - July 31 = 0); (August 1 - Dec 31 = 1);	July - All Anglers	NO
H	2.0 to less than 2.6	20,600	1	1	(Jan 1 - June 15 = 2); (June 16 - June 30 = 1); (July 1 - August 15 = 0); (August 16 - Dec 31 = 1);	July 1 - August 15 - All Anglers	NO
I	Less than 2.0	Commission Determination	??	??	??	YES	NO

<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/proposals/176.pdf>

this panel shows the current king salmon management plan tiers, Abundance Index (AI) ranges, and sport allocations for reference only

Tier	OLD AI Range	Sport Allocation Range	Resident Bag	Nonresident Bag	Nonresident Annual
C	Greater than 2.10	Greater than 64,272	3	2 May & June - 1 Remainder	6
D	Between 1.76 and 2.0	63,967 - 56,646	3	2 May - 1 Remainder	5 or 6
E	Between 1.51 and 1.75	56,341 - 48,867	3	2 May - 1 Remainder	4 or 5
F	Between 1.21 and 1.50	45,194 - 36,887	2	1	3
G	Between 1.11 and 1.20	32,456 - 28,859	1	1	(Jan 1 - June 30 = 3); (July 1 - July 15 = 2); (July 16 - Dec 31 = 1)
H	Between 1.01 and 1.10	28,410 - 23,464	1	1	(Jan 1 - June 30 = 3); (July 1 - Dec 31 = 1)
I	Less than 1.0	Less than 23,259	1	1	(Jan 1 - June 30 = 3); (July 1 - Dec 31 = 1)

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Tier	OLD AI Range	Sport Allocation Range	Resident Bag	Nonresident Bag <sup>1</sup>	Nonresident Annual <sup>1</sup>	Sport Harvest Range Observed	Average Sport Harvest Observed	Years this Preseason AI, allocation, and range/average in effect	Expected Sport Harvest under Proposal 176	Difference between Observed (low-end Range) and Expected (Proposal 176)	Difference between Observed (high-end Range) and Expected (Proposal 176)	Difference between Observed (Average) and Expected (176)
C	Greater than 2.10	Greater than 64,272	3	2 May & June - 1 Remainder	6	73,951	73,951	2014	69,090	-4,861	4,951	4,951
D	Between 1.76 and 2.0	63,967 - 56,646	3	2 May - 1 Remainder	5 or 6	49,239	63,330	2003, 2004, 2005, 2016	61,900	-12,661	1,430	-5,029
E	Between 1.51 and 1.75	56,341 - 48,867	3	2 May - 1 Remainder	4 or 5	37,722	69,375	2002, 2006, 2007, 2011, 2012	49,300	-11,578	20,075	4,473
F	Between 1.21 and 1.50	45,194 - 36,887	2	1	3	44,315	65,174	2009, 2010, 2015, 2017	37,900	-6,415	27,274	13,370
G	Between 1.11 and 1.20	32,456 - 28,859	1	1	(Jan 1 - June 30 = 3); (July 1 - July 15 = 2); (July 16 - Dec 31 = 1)	43,304	44,725	2001, 2013	25,800	-17,504	18,925	18,215
H	Between 1.01 and 1.10	28,410 - 23,464	1	1	(Jan 1 - June 30 = 3); (July 1 - Dec 31 = 1)	21,327	32,603	2008, 2018	20,600	-727	12,003	6,365
I	Less than 1.0	Less than 23,259	1	1	(Jan 1 - June 30 = 3); (July 1 - Dec 31 = 1)							

<sup>1</sup> In some years, the Regional Regulations were deviated from

Green cells depict actual observed values (allocations, bag and annual limits, and harvest)

Blue cells depict differences between what we anticipate harvesting under Proposal 176 prescriptions compared to what was actually harvested for each tier in the various years that those were in play

The % of the total harvest by residency and year across the Southeast region (obtained from Final SWHS estimates through 2017) is provided below;

NOTE--The SWHS estimates are germane to Total Harvest, not Treaty Harvest so this scenario would be a proxy to understanding the impacts of Proposal 176 compared to previous fishery performance under the current Management Plan

NOTE--harvest patterns by residency vary significantly from port to port and can also vary year to year depending on differences in abundance and resulting management prescriptions; the use of such information therefore needs to be strategically understood, are applied to the appropriate years identified in Column J AND being cautious of underlying data limitations and assumptions, as alluded to above

Year	Resident Harvest %	Nonresident Harvest %
2001	42%	58%
2002	46%	54%
2003	48%	52%
2004	46%	54%
2005	44%	56%
2006	38%	62%
2007	38%	62%
2008	46%	54%
2009	55%	45%
2010	48%	52%
2011	36%	64%
2012	29%	71%
2013	47%	53%
2014	35%	65%
2015	30%	70%
2016	31%	69%
2017	32%	68%

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The % of the total harvest by residency and year across the Southeast region (obtained from Final SWHS estimates through 2017) is provided below;

NOTE--The SWHS estimates are germane to Total Harvest, not Treaty Harvest so this scenario would be a proxy to understanding the impacts of Proposal 176 compared to previous fishery performance under the current Management Plan

NOTE--harvest patterns by residency vary significantly from port to port and can also vary year to year depending on differences in abundance and resulting management prescriptions; the use of such information therefore needs to be strategically understood  
One could apply these %'s to Columns L, M, and N to understand the impacts to both resident and nonresident anglers as long as they are applied to the appropriate years identified in Column J AND being cautious of underlying data limitations and assumptions, as alluded to above

Year	Resident Harvest %	Nonresident Harvest %
2001	42%	58%
2002	46%	54%
2003	48%	52%
2004	46%	54%
2005	44%	56%
2006	38%	62%
2007	38%	62%
2008	46%	54%
2009	55%	45%
2010	48%	52%
2011	36%	64%
2012	29%	71%
2013	47%	53%
2014	35%	65%
2015	30%	70%
2016	31%	69%
2017	32%	68%

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