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State of Alaska
 Department of Fish & Game
 Board Support Section
 Karl Johnstone, Chair
 PO Box 115526
 Juneau, AK 99811-5526

Dear Board of Fisheries Members,

Kenai Peninsula Fishermen's Association (KPFA), offers the following comments on the Task Force and (proposal 249) and Hind-cast of 2012 Management:

First of all, both Tom Kluberton and Vince Webster should be commended for their professional approach as Co-Chairs during the Task Force meetings. Clearly, new information released by the Department significantly assisted in the multitude of challenges during these proceedings. The "allocation neutral" position by both Co-Chairs certainly aided discussions on fishery resources and those who depend on them.

2012 Overview:

The Upper Subdistrict set gillnet fishery (ESSN), community of set gillnet fishing families, KPFA members, and set gillnet fishermen as a whole bore the brunt of unprecedented closures and economic losses during the 2012 season. Nearly all lost 95% of fishing income that would have been generated under normal prosecution of the sockeye salmon fisheries. Instead, uncertainty over the run strength on Kenai River late-run Chinook at the very beginning of the season (June 25th) generated emergency order closures and restrictions by the Department – coupled under very good forecasted sockeye returns. The Department announced a wait-to-fish approach coupled with if significant numbers occur along the beaches we fish. Unfortunately, the opening resulted in dismal sockeye harvest levels as the opening occurred a day later and well over 100,000 entered the Kenai River. The ESSN fishery harvest for 2012 approximated only 70,000 sockeye versus a 1.2 – 1.4 million sockeye harvest, along with a lost pink salmon harvest of well over 200,000 during an exceptionable pink return.

- Fishing operation plans were faced with a multitude of economic losses in-season and dealing with situational factors never before experienced on whether or not to hold crews, "we may be

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open tomorrow conditions" but never realized. The total impact can't be expressed in dollars alone, generations of commercial fishing family's fish - as a way of life.

- 95% of surplus-to-escapement sockeye reallocated to the Drift fleet (7 days per week openings).
- Kenai River late-run inriver sockeye salmon goal exceeded.
- 2011, closed the first week of August over king salmon enumeration uncertainties even though Department chose management by Echo Length Sonar Distribution (ELSD) counts (split beam sonar adjusted counts lower Target Strength estimates) - king counts were well above the mid-point and escapement goal range in regulation / management was based on Split Beam Sonar since 1999. However, reallocation of sockeye salmon through additional Drift only EO openings occurred. The Kenai River late-run sockeye Management Plan in-river goal - exceeded.

2012 Hind-cast from ADF&G 2013 new information:

- **Kenai River Late-run Chinook goals – all 27 years: Number of years goal was not met: None; number of years the goal was met: 8; number of years the goal was exceeded: 19.**
- **Restrictions, closures in 2012 should not have occurred.** 2012 DIDSON daily counts and projected In-river Run was off by nearly 100% with 28,000 In-river run. **The Department's latest released 2012 table estimated the goal would be met on July 17th – the exact date of closure to ESSN and In-river sport fishery; the Departments table produced during the Special meeting August 2nd, 2012 projected the In-river run on July 29th as 14,500 vs. 28,000 spawning escapement.**

2013 ADF&G new information – continued:

- **Significant numbers of larger – sized Chinooks estimated at and around the transducer(s)** when ADF&G investigated passage at and near the transducer area that is not insonified in the Mid-channel insonified Area.

Note: recommendation made by Dr. Mulligan in 2010 review of sonar assessment program; still awaiting data on DIDSON investigations on investigation of Chinook passage above the Mid-Channel Insonified Area during Low water – **since the DIDSON sonar is set to only target passage during Low-tide water column at river mile 8.6 and along the bottom profile but approximately two-thirds of this Mid-Channel Insonified Area is only insonified during Low tides; during High Tides No passage estimates are insonified (Zero, i.e., nearly 70% of the water column left out). In addition, both near-shore bank area's are excluded (not insonified).**

- **Genetic Mark Recapture Radio Tagged Studies** estimated to DIDSON yearly counts – DIDSON sonar estimate in comparison studies during 2010, 2011, and 2012.
- **Genetic Stock Identification information on ESSN harvest percentages for Kenai River late-run Chinook salmon is only 12.6% exploitation rate on total returns.** The ESSN exploitation rate of Kenai River late-run king salmon in a mixed stock fishery is low. Sockeye salmon stocks are 99.99% of ESSN harvest.

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In addition: 43% of ESSN king harvest are less than 28 inches in length and 49% of harvest are comprised on less than 30 inches in length - which the DIDSON sonar program excludes (not counted by DIDSON sonar).

In addition, ESSN exploitation rate of Early-run Chinook salmon - only .003 (3 out a thousand fish (king), essentially zero .000008.

Genetic Stock Identification (G.S.I.) of Early-run and Late-run in Department reports (Tim McKinley, ADF&G G.S. I reports) shows run timing and stock composition over several years based on G.S.I. studies – notably tributary (early run) fish have entered the river by June 15th – June 18th and transitions to mainstem (late-run) at that time; i.e., approximately 1,000 mainstem entered the Kenai system but counted as Early-run under the demarcation date on Early Run up to the end of June. ADF&G indicated in earlier reports this information would be extremely beneficial in escapement goal review (Ref. Eskelin, Miller) Quantitative Evaluation of Parameters used to assess Kenai River King salmon 1986 – 2010.

- **Combined Exploitation rate (all user groups combined harvest) on Kenai River Late-run Chinook salmon: mean average (all years) only .39% of total return. Note: Draft Run Reconstruction, Spawner-Recruit Analysis, and Escapement Goal recommendation for Late-run Chinook salmon in the Kenai Rive Report states this stock as "underutilized" during most years and recent production declines are attributed over escapement years. **However, of Note:** ADF&G brood year data on parent year escapements for age 1.2, 1.3, and 1.4 age classes returning in 2013 is positive. We have come off the high escapement brood years and historical comparative brood year escapement data indicates the mean average age class returns approximates 1.5 (R/S); therefore, the forecast for 29,000 return could be significantly higher @ 36,000 – 46,000 return.**

Respectfully,

Robert V. Williams, President