

RC # 144

New Information in reference to the changes to the Wood River Sockeye Salmon Special Harvest Area Management Plan made in amendments to proposals 79 and 83

1. The change to proposal 83 adding a $4 \frac{3}{4}$ in mesh restriction allowance was made with no opportunity for public comment. RC 82 was not printed and available to read until after the vote so a balanced view of public opinion and the ramifications of this change were not heard by the board.

2. Amendments were also made to proposal 79 with no opportunity for public comment. Both of these proposals have added language the Wood River Sockeye Salmon Special Harvest Area Management Plan.

3. The discussion surrounding the amended Proposal 83 failed to describe the actual immediate economic impact even the slight possibility of a gear restriction will have on the fleet - whether or not management decides to use this new tool, the fleet will have to be geared up for it. If a fisherman did not have extra lines and gear that would qualify under this requirement; the immediate cost would be thousands of dollars

Furthermore, while it was discussed that there is still time to buy qualifying gear, if a fisherman does not already have it, that time is limited, LFS, Jovanavich and others do have gear in supply, but often they will sell out when demand is higher than expected (this happened with pink gear four years ago when processors required an abnormal gear size). This gear is made overseas and, it takes time to have new gear ordered so it is likely that a portion of the fleet would not be able to locate gear. The argument has been made that $4 \frac{3}{4}$ is qualifying pink salmon gear and therefore fishermen may already have it or can acquire it easily, however, over the past six years many markets have been requiring $4 \frac{3}{8}$ gear for pink salmon fishing, in order to target females. Many of the suppliers have a solid supply of this size gear, and may not be expecting large orders of the larger less requested size ($4 \frac{3}{4}$).

4. This proposal was passed as a conservation tool, but was based on limited rhetorical input from fishermen, rather than scientific backing. While it is generally agreed that Nushagak Sockeye are larger, and Wood River Sockeye are generally smaller, this is not an exact discrepancy and there are populations of Nushagak fish which are smaller than Wood River fish and vice versa. Also, females are generally smaller than males, so it is possible this would result in a higher number of females killed.

Gear restrictions for other stocks do exist, and are generally successful, but these are usually designed to discriminate between species with a significant size difference (Chinook (avg 16lb) & Sockeye (avg 5lb) or Coho (avg 7 lb) & Pinks (avg 3 lb). I know of no studies proving a gear restriction of $4 \frac{3}{4}$ would be successful in discriminating between the $4 \frac{1}{2}$ lb average Wood river populations and $5 \frac{1}{4}$ lb

Nushagak fish. I believe this information should be obtained before passing down an economically burdensome restriction which is not yet tested or proven.

5. Finally, this has been presented as an option, and not a requirement. Something the manager may try out, see if it works for conservation of Nushagak fish, and decide if it is worth using. The problem here is, there will be no way to measure if this is working, and if it turns out it doesn't work, that will be at a point where we should have been managing to conserve Nushagak fish, and instead we are still fishing in the general district with gear which is entirely capable of catching and killing Nushagak fish. (a recent study has been done on the optimum mesh size for capturing sockeye at Port Moller, and the result was 4 $\frac{3}{4}$)

6. The issue of drop outs was discussed, but no conclusion was reached. I consider this a significant factor. These larger fish are not going to swim around these smaller nets. They are going to hit them the same as any fish. What happens when a fish hits a mesh slightly too small to be gilled, is they catch their heads in the mesh, pin their gills closed and often die more quickly than a gilled fish, or one that has made it part way through the mesh and caught on the dorsal. When nets are pulled these fish either come in the boat, or when it is rough or the net is jerked, they often fall out, already dead. At any size mesh, the manner in which a fish can become entangled, and the range in size of captured fish is great, further casting doubt on the idea that a gear restriction would be able to exclude Nushagak fish while retaining Wood River.

7. I request that the following options are considered, and further discussion takes place to give this proposal.

1. Amend proposal 79 to add ***require a minimum of a one year, peer reviewed study, before a mess restriction for conservation between stocks of sockeye in the Nushagak district may be enacted. (section 5AAC06.358 Wood River Sockeye Salmon Special Harvest Area Management Plan.)***

or

2. Amend proposal 79 to add ***the department will not implement a mesh restriction of 4 $\frac{3}{4}$ for the conservation of Nushagak Sockeye before January 1 2014 (section 5AAC06.358 Wood River Sockeye Salmon Special Harvest Area Management Plan.)*** in order to allow time for the fleet to gear up for this option.

or

3. remove the language from section 5AAC06.358 Wood River Sockeye Salmon Special Harvest Area Management Plan which would allow mesh restrictions by emergency order

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