

Board of Fish members

Board Support: Attention Glenn Haight - Please distribute to Board on Emergency Petition scheduled for April 03, 2014

Cc" Mr. Paul Shardura (petitioner)

All statistical CPUE estimates on kings and Kasilof River sockeye salmon management in the Kasilof Section (source ADF&G)

Board Members:

The Calculation on 12 hours from CPUE in 2013 foregone sockeye over 1 early-run king and foregone yield in sockeye escapement (ADF&G CPUE information). Also, CPUE for 12 hours per day not fished represented the amount of sockeye foregone over the harvest amount on "kings". See Ratio Chinook to Sockeye CPUE represents 99.99916 as Sockeye ratio vs. Chinook mainstem Kenai kings harvest CPUE .000846 in 2013 after July 8th.

Kasilof Section sockeye salmon fishery, the realized cost of "incidental harvest" with harvest comprised of >70% smaller kings (age 1.1 and 1.2's). The burden of conservation per opening in the Kasilof Section by harvest is greater than the Board of Fish contemplated nor fully considered during the board deliberation process by discussion on information on management of the Kasilof River sockeye salmon BEG and discussion by the Department of Fish and Game was limited.

RC 151 would result in foregone sockeye harvest per week over an estimate harvest of Kenai mainstem kings that comprise of 60 -70% smaller kings by harvest. Conversely, the 7,500 allocated to inriver sport will comprise of 95% of larger kings. Conversely, the in-river sport fishery is not impacted by foregone sockeye harvest. Conversely, the Kasilof Section harvest on Kenai kings comprised of mainly smaller aged Kenai king salmon over Board Generated Proposal RC on RC 15 by the board. Conversely, the burden cost to the Kasilof Section to "save" smaller king (1.1 and 1.2) can be calculated to estimate the loss of 30,421 sockeye salmon foregone before July 8th for every 12-hour opening closure; and 82,452 sockeye salmon foregone per 12 hours per lost opening after July 8th. The Board action on RC 151 will ensure the BEG on Kasilof River will be jeopardized and will not distribute escapements evenly; 2013 escapement already grossly exceeded the BEG goal by 488,000 escapement. Prior spawner - recruit loss over similar gross over escapements produced returns of mere replacement and a lost benefit on yield of 600,000 sockeye never realized. The Kasilof River has a BEG for maximum sustained yield and the fact that gross escapement years produced less than replacement with a data set that is scientifically defensible.

The economic factor (foregone (lost) economic benefit available in-season) can be calculated and estimated. $30,421 \text{ sockeye salmon} \times 6 \text{ lb. average} \times \$2.20 / \text{lb.ex-vessel} = \$401,557.20$ (12-hour lost opening per week) in Kasilof Section before July 8th.

The economic factor (foregone (lost) economic benefit available in-season) can be calculated and estimated. $82,452 \text{ sockeye salmon} \times 6 \text{ lb. average} \times \$2.20 / \text{lb.ex-vessel} = \$1,088,366.40$

per 12-hour lost per week in the Kasilof Section after July 8th with new information from ADF&G Commercial Fisheries Division.

The cost factor for non-harvest (RC 151) by age 1.1 jack male and 1.2 male Kenai chinooks can be calculated based on 2013 genetic harvest data and 2013 CPUE and Sockeye CPUE data. Harvest per averaged 12-hour opening comprised of 28 age 1.1 males, 17 age 1.2 males, 7 age 1.3's, and 6 age 1.4 in the entire Kasilof Section set gillnet fishery prior to July 8th in 2013. Over 8,100 sockeye salmon are harvested per hour in the Kasilof Section per Hour after July 7th with a million dollars in salmon resources per opening foregone if not corrected by the Board.

50% of Kasilof Section small king harvest was attributed to 1.1 jacks - with a cost proportion of \$200,000 to the Kasilof Section set gillnet fishery in lost sockeye salmon benefit detailed above. After July 8th in the Kasilof Section the cost associated to 1.1 jack savings would continue along with the associated number of 1.2 males "saved", these two age classes "saved or conserved" comprise of 75% of Kasilof section harvest with an associated sockeye cost of well over \$250,000 per lost opening in-season. The burden to conserve age 1.1 and age 1.2 Kenai late-run kings is significant as a result of action taken on RC 151. and directly relates to significant foregone sockeye harvest lost benefit not fully considered in the Kasilof Section. Including, sockeye salmon management failure of the Kasilof River sockeye BEG goal and further significant cost and foregone harvest by reduced yields (lost recruitment for yield / surplus harvest).

Petitions to Board to decouple hours in the Kasilof Section per week based on significant new information over foregone harvest levels never fully considered by the Board by deliberations or ADF&G on the record. The requested action to consider the Kasilof Section decoupled through July 23rd date or through the mid-point of the Kenai River king salmon late-run in-river return (July 20th). The board can simply decouple the Kasilof Section on hours and gear as 36 - 75 hours per week in regulation, thereby EO hours and regular period opened time hours of up to 75 hours for management of Kasilof River sockeye salmon stocks as intended by statute on emergency order authority of the Commissioner and the delegation of E.O. for management of Kasilof River sockeye salmon consistent with Board Findings to accomplish the Department's mission and duties to not exceed escapement rates into the Kasilof River and avoid the negative consequences that resulted by ADF&G management during 2013 from arbitrary use of limited hours with little benefit to the resource since very low exploitation rates on Kenai River king stocks occur in the Kasilof Section.

Zero "early-run king salmon" caused two separate closures in 2013 in the Kasilof Section and sent 100,000 sockeye into escapement early in June. Where else in this State would 1 fish cause 100,000 sockeye salmon to be foregone? The Lower Sport Marine harvest of early-run kings is 5% of total harvest and allowed to fish 24 hours a day, the Lower Inlet sport Marine caught hundreds and fished 24 hours a day. The Kasilof Section ADF&G use of E.O. to not open the Kasilof Section per the Kasilof Sockeye Plan when 50,000 sockeye went into the Kasilof River on June 21. ADF&G went outside the Kasilof Plan and also closed the personal use gillnet fishery five days earlier than normal over zero "early run kings". The genetic data from Sport Fish Division shows nearly all tributary early run kings enter the Kenai River before June 20th.

In 2013 only 203 Kenai kings total harvest in the Kasilof Section on age 1.3 and 1.4 during the 12 openings - less than 2% (.016) of the inriver run for these age classes 1.3 and 1.4 (12,000 counted in-river). Hundreds of thousands of surplus sockeye salmon precluded from harvest at

a cost of millions of dollars in foregone benefit. The Kenai Section harvested 400 larger aged Kenai late-run during 6 openings and reflects king salmon entry patterns and run timing after July 15th into the Kenai River.

98.98% of nets fishing in the Kasilof Section do not catch any Kenai kings in any opening (2013 generic harvest data).

The petition seeks to protect Kasilof River sockeye salmon BEG yields on Kasilof River sockeye salmon through traditional set gillnet fishing methods and means (Hours per week). Clearly, 36 hours per week in the Kasilof Section will not maintain this sockeye salmon resource and cause significant lost benefit to occur in-season on a run forecasted above average (1.1 million run). On runs of 1.1 million Kasilof sockeye a minimum of 64 hours per week is required for management and up to 84 hours as used by ADF&G in 2005 and 2009 over harvest patterns to manage to the Kasilof escapement goal. And note the 2005 hours were not enough as the goal was exceeded and also in 2009 the BEG was exceeded.

Placing significant risk on reduced Kasilof River sockeye salmon yields and risk further economic loss to the fishing communities that depend on this resource was not fully vetted on RC 151 during deliberations. The cost- lost benefit over jack Kenai kings and 2-ocean males that make up the majority of harvest in the Kasilof Section compared to the loss of 600,000 sockeye salmon (lost yield) and economic cost lost benefit on a salmon resource available in-season is 1 million dollars in lost harvest per unopened 12 hour period in a week and requires your review and consideration. ADF&G reports state these smaller aged kings are undercounted and the in-river sport fishery is a directed trophy fishery selects larger aged fish.

ADF&G is aware of the Hourly CPUE exploitation rate of .0008 percent (Kenai mainstem king salmon after July 7th) an insignificant harvest rate in a mixed stock directed sockeye salmon fishery. Emergency Order authority in statute pertains to the management of all salmon stocks to be maintained and fully utilized. Directing the Department to open 36 hours per week in the Kasilof Section by Emergency Order is a directive to ADF&G to not manage to the Kasilof River sockeye salmon BEG goal contrary to the established Kasilof River sockeye salmon goal for maximum sustained yields. ADF&G's hasn't helped the public process nor fully engaged the Board on information. ADF&G's responses to the petitions fell short by not providing relevant information on management of salmon stocks (sockeye, king salmon) in order for the Board to weigh in the merits of the petitions or the petition now in front of the Board. Final escapement into the Kasilof River was 488,000 sockeye in 2013 which sent 238,000 sockeye into escapement above the mid-point of the BEG goal and placed significant risk on production.

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