



Kenai Peninsula Fishermen's Association

Ensuring the Sustainability of Our Fishery Resources

43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276
 (907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

January 9, 2014

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

RE: Kodiak Finfish Regulatory Meeting 01.07-10.14

Subject: Further comments on Proposals 98, 94 and 100

Chairman Johnstone,

After further review, we would like to offer a suggestion for modifying the Igvak and Mainland Districts management of commercial fisheries and the Kodiak Region Management Area KRMA sport fisheries to include language that will attempt to minimize the harvest of Cook Inlet (CI) bound sea-run king salmon (Chinook). Seven "stocks of concern" in conjunction with other king stocks returning to CI natal streams are indicating lower than normal returning adults which should "trigger" the concepts of the "precautionary principle". It would be prudent to lessen the probability that these CI bound adults or immature "feeder" kings will be intercepted or incidentally caught in the KRMA region.

- ✦ We would suggest that the *Mainland District* include specific language that seeks to limit Chinook mortality (7,976 in 2013) by adopting non-retention language of any size king after documenting relative size and number.
- ✦ We would include specific direction to limit time and area that would historically indicate higher ratios of king caught versus other statistical areas within the Mainland District.
- ✦ We encourage the Department to have a more visible roll *in season* by monitoring harvests daily or hourly to emphasis harvesting of targeted salmon stocks and minimizing the mortalities of Chinook.
- ✦ We believe that methods and means restrictions are inappropriate as they interfere with the productivity of the commercial harvester although increasing the gear size/length from historical practices would not appear to be prudent at this time.

- ✦ We do support *surgical detailed management* practices that will look at ways to maximize the harvest of surplus stocks while minimizing the harvest of minor, non targeted species (kings). We would encourage fisheries managers to work with the harvesters in adopting changes to time and area.
- ✦ In the entire KRMA the sports harvest *estimate* was approximately 7,500 king salmon in 2012. No apparent information is currently available on the size and the origins of this highly selective targeted fishery. Considering the anecdotal information from local managers and the many advertisements from local charter operations it would appear that unlike the relative low weights (size) of the commercial harvest the sports fishery is targeting much larger and a more mature *age-class* of Chinooks.
- ✦ Time, area, methods and means restrictions should be adopted in the sports fishing regulations that will allow opportunity in times when the probability of CI bound kings are not present in the waters open to sport fishing.

As defined in 5 AAC 39.220 **Policy for the management of mixed stock salmon fisheries**, terms like "*burden*" sharing and the "*precautionary*" approach direct the Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Fisheries (BOF) to consider equal applications of the rules so that the restrictions placed on all users are fair and reasonable. The end user stakeholders, the terminal harvesters (CI) are seeking relief from having the entire weight of restrictions placed on their particular fisheries. Our attempt here is to minimize the negative effects to the traditional and historical user while spreading the necessary reductions of opportunity over the broad spectrum of Alaskan resource users, thereby lessening the impact on a particular localized end users.

Please review the area by area harvest graphs for the KRMA area. We offer this to BOF members for their consideration and information purposes. We obtained this information from Department documents available to the public at this meeting.

Thank you,



Paul A. Shadura II

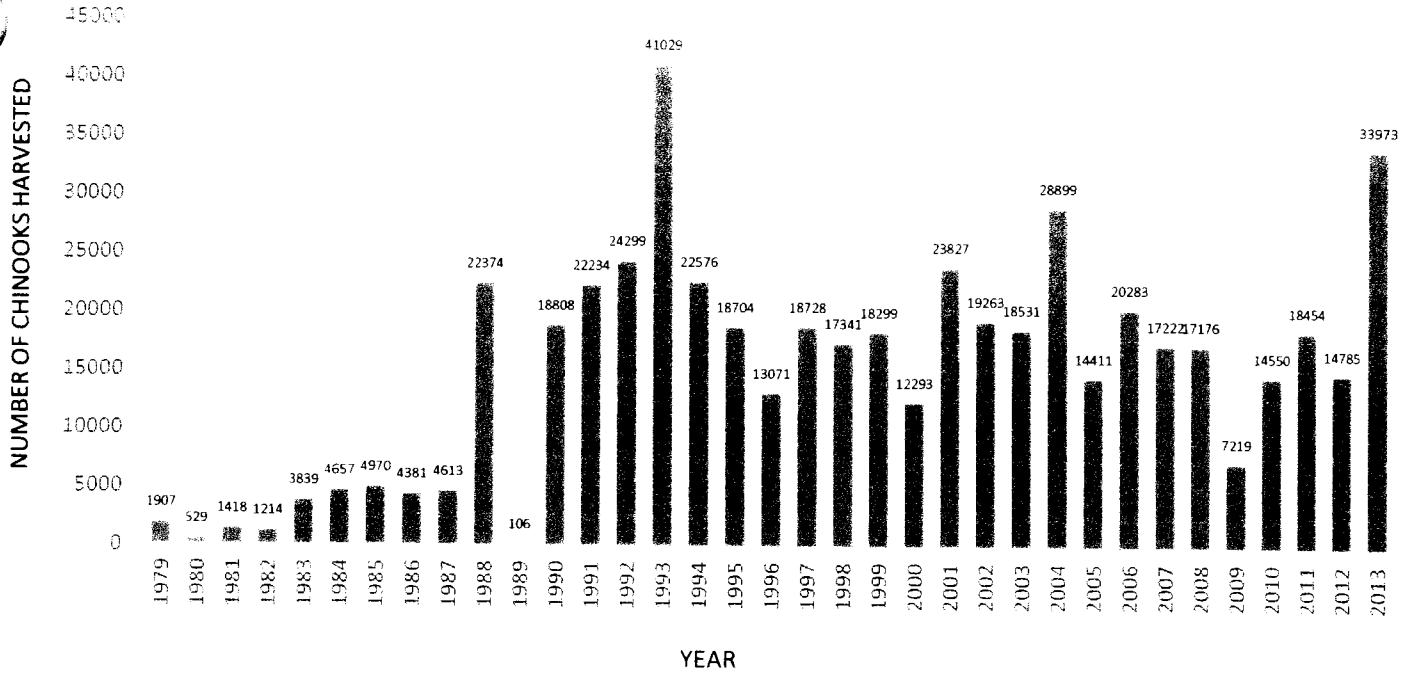
Board Director

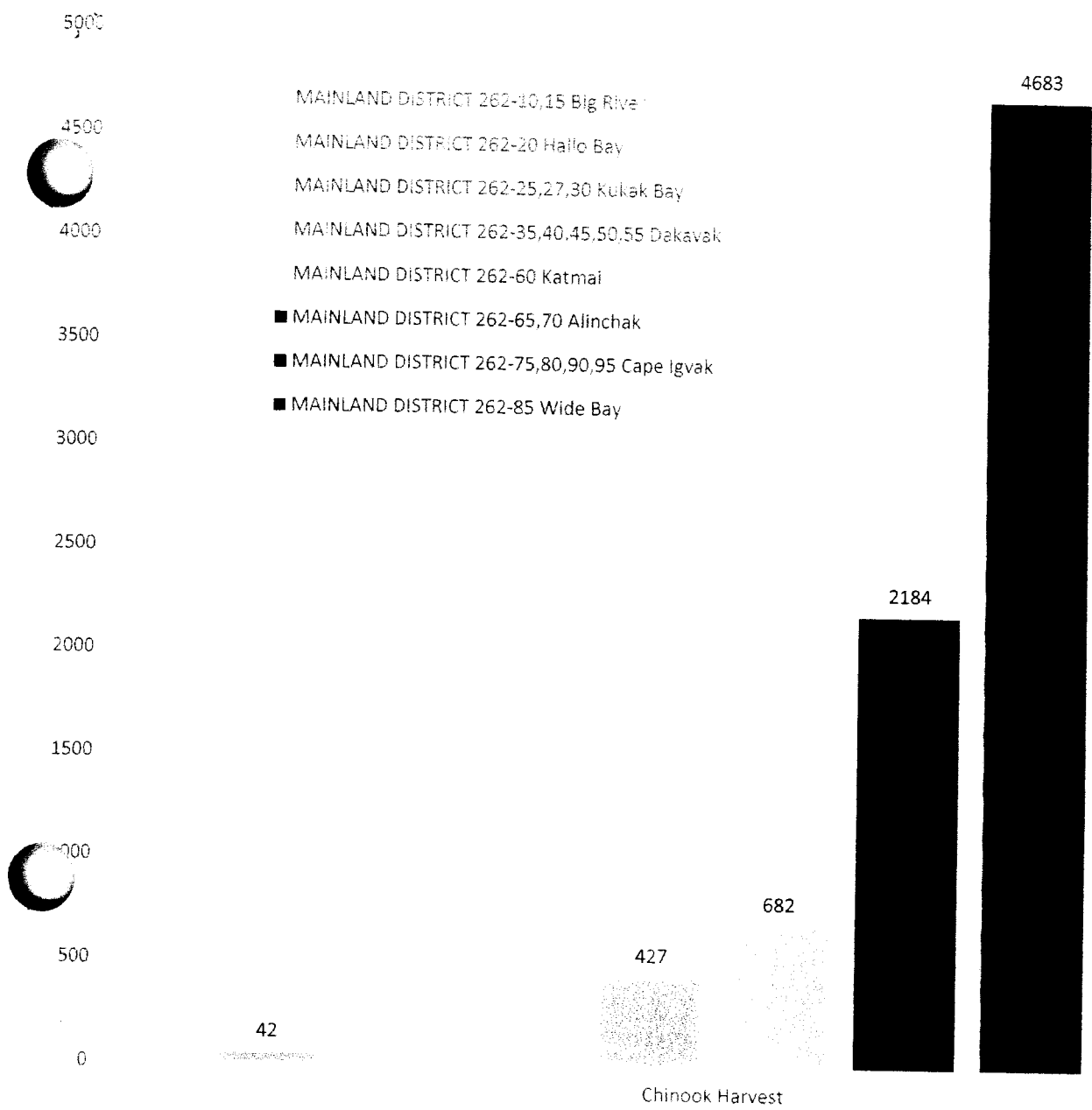
Kenai Peninsula Fishermen's Association

Estimates of Southcentral Alaska sport Sea-run Chinook salmon harvest, 2003-2012.

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
SOUTHCENTRAL										
(J) North Gulf Coast/Prince William Sound	6372	5553	6059	7931	6438	5650	6145	5366	3928	3076
(K) Knik Arm	2562	2556	3692	3813	4326	2843	2152	1076	1012	292
(L) Anchorage	3678	3160	4329	3165	3106	2647	1027	1130	616	113
(M) Susitna River drainage	24534	24192	24632	24864	20341	13426	8368	8894	8701	2785
(N) West Cook Inlet drainages	1124	782	546	1038	1380	437	829	854	76	0
(PF) Kenai Peninsula freshwater	25472	26383	30066	26265	26461	23397	15637	14136	15089	2226
(PS) Cook Inlet saltwater	14828	17737	18850	16368	12556	8562	6546	10134	9284	6890
(PX) Cook Inlet (Shellfish only)	0	0	0	0	0	0	0	0	0	0
(Q) Kodiak	9031	11263	9298	11821	11251	9466	8854	6440	7926	7558
(R) Alaska Peninsula/Aleutian Islands	3105	4263	3215	3682	2538	2134	2826	2329	2923	2687
(S) Kvichak River drainage	577	1293	1440	1132	1075	1072	300	418	1427	917
(T) Nushagak, Wood River and Togiak	7004	8607	9537	8976	11587	7700	7171	4514	6529	6804
Southcentral Total	98287	105789	111664	109055	101059	77334	59855	55291	57511	33348

Kodiak Commercial Chinook Harvest 1979-2013





2013 MAINLAND DISTRICT HARVEST BY STAT AREA