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Sent: Monday, October 27, 2008 9:46 AM

To: Rep. Craig Johnson

Cc: Peter Micciche; Mayor Pat Porter; Mayor Dave Carey; Comm Denby Lloyd; Rep. Paul Seaton; Rep. Kurt Olson; Rep. Mike Chenault; Sen. Tom Wagoner; Cora Crome; Frank Bailey; Governor Sarah Palin (GOV sponsored)

Subject: KAFC Letter to Leg. Task Force on UCI Fisheries

Dear Chairman Johnson,

Please see the attached advanced copy of a letter to the Task Force from our group, Kenai Area Fisherman's Coalition (KAFC). This letter outlines information we would ask the task force members to consider before making any recommendations to the legislature during this upcoming session. We request the members base their decisions on the best scientific information available and stay clear of agendas driven by special interest.

Our group has 10 retired fisheries scientists and managers on our BOD with a thorough understanding of all fisheries studies conducted in UCI over the past 25 years. We represent private resource users and have no commercial interests. We would be glad to assist the Task Force with any additional information or scientific evaluation they may desire.

Please pass this letter on to all Task Force members and keep us informed on Task Force issues as they develop.

Respectfully Submitted,

Dwight Kramer - KAFC Chairman
283-1054



**Kenai
Area
Fisherman's
Coalition**

PROTECTING YOUR FISHING RIGHTS & RESOURCES

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Legislative Task Force on Upper Cook Inlet Fisheries
C/o Rep. Craig Johnson
716 W. 4th Ave. Ste. 640
Anchorage, Ak. 99501-2133

October 27, 2008

Dear Chairman Johnson,

The Kenai Area Fisherman's Coalition (KAFC) is an organization composed of scientists and concerned users of the Kenai Peninsula waters. We have 10 fisheries biologists in our organization that provide over 120 years of experience on the Kenai and Upper Cook Inlet (UCI) in both research and management. We also like to consider ourselves a "Joe Fisherman" organization since we have no commercial interest. Our membership is close to 200 members.

We believe that habitat protection should be the primary goal of any resource organization or government agency. We support the concept that user group needs are secondary to habitat protection. We also strongly support salmon escapement goal management. This is the foundation Alaska has developed to maintain salmon resources at sustainable levels.

We have been following the task force progress and feel that our input would be of value to you at this time. As you are now aware, the UCI fisheries are very complex. User groups tend to be selective in their use of information and ADF&G and the Board of Fisheries (BOF) are caught in the middle of the allocation battles.

This has led to distrust and confusion within the public and regulatory agencies. It has also created uncertainty in how stable the various fisheries will be in the future. The creation of the legislative task force did not help this situation. We recommend no major alterations to the present management framework.

We do have some comments for the task force to consider:

1. **UCI complexity is difficult to understand** – The task force was created out of concern for UCI northern salmon stocks and allocation issues in the Mat/Su area.

We attended and participated in the February 2008 BOF meeting and found it to be a fair and reasonable process. Decisions made there did not threaten any resource and balanced the user needs in an appropriate manner.

We would caution that making changes to the BOF process or the way UCI fisheries are managed would be a mistake at this time. As sport and personal use fisherman we are concerned that the task force will focus on the upper Inlet and will lose sight of the ramifications of their actions on the Kenai Peninsula systems where most of South-central fisherman fish.

Escapement goals for Kenai Sockeye and Chinook salmon have been established to provide high sustained yields for the benefit of all user groups. There is compelling evidence that when these goals are exceeded future yields will be reduced. Action taken in the drift gill net fleet to reduce exploitation rates for Northern bound salmon may cause fish managers to exceed Kenai and Kasilof River goals and therefore contribute to smaller returns and less harvestable surplus in the future.

Only about 10,000 Sockeye salmon are harvested by sport fisherman in the Susitna River basin while hundreds of thousands are harvested by personal use and sport fisherman in the Kenai River. Records indicate that of the over 300,000 salmon harvested in the Kenai / Kasilof personal use fisheries about 93% are harvested by folks from the Anchorage and Mat/Su areas. Similar comparisons exist for the additional 150,000 annual Sockeye sport harvest on the Kenai River alone. Please remember this when you make your recommendations. Providing a few thousand more sockeye to the Susitna River may result in the loss of tens of thousands of salmon to Anchorage and Mat/Su sport and personal use fisherman who fish the Kenai River.

Relative to Chinook salmon, you should know by now that severe restrictions on the drift gill net fleet will allow more sockeye salmon headed to the Kenai Peninsula streams to reach the near shore areas of the western Kenai Peninsula. This has two impacts – one it requires more fishing time for the set net fishery which increases the harvest of Kenai River Chinook salmon. Second, the quality of the commercial salmon harvested is decreased as fish have held longer in the fresher waters of UCI.

Thus, there is a significant cost for restricting the drift gill net fleet more than necessary to meet escapement objectives in the Northern District.

2. Data needs to be examined closely – The ADF&G has spent thousands of dollars on studies of Northern bound salmon. The task force should examine that data relative to the objectives of the task force.

For example, ADF&G tagging studies show that most Northern bound salmon are making it into the freshwaters of the region. Exploitation rates on Chum, Coho, Chinook, and Pink salmon by the commercial fisheries are less than 15 percent. Therefore, 85 percent of these stocks are available for sport anglers.

Sockeye salmon are reaching the spawning grounds in numbers far higher than previously thought and escapement objectives are being met and have been met in the past. The Bendix counting system was giving everyone a false impression of actual escapement and therefore a false conclusion that goals were not being met.

The task force needs to decide if major alterations in the present fisheries are required if only 15% more Coho, Chum, Pink, and Chinook salmon (maximum level) are put in the system (this would only be accomplished with a total closure of the commercial fisheries – both set and drift gill net). We maintain that this is not required and that the additional 15% would not be measurable in the sport and personal use fisheries on these stocks.

Relative to Sockeye salmon, our concern in the Northern District is a loss of production due to invasive species and blockage of migration of adult salmon. For example, Shell Lake had over 60,000 spawning fish return in 2007 but in 2008 only a few thousand returned. Why? The parent year for the 2008 was 2003/4 and in those years numerous beaver dams blocked Shell Lake Sockeye salmon from reaching the spawning grounds. A lack of spawning fish means poor future returns. The task force needs to concentrate its recommendations on the real threats to production in the Northern District streams – invasive species, blockage of fish migration, and habitat destruction.

3. What is the real issue - The concern of Mat/Su user groups is that fishing opportunity and catch rates are not meeting their needs.

We examined the sport fish harvest figures for the Northern District and found that the exploitation rates by sport fisherman are very low relative to the stock abundance estimates from ADF&G studies. For example, harvest of Sockeye, Chum, and Pink salmon are very low (less than 10,000 fish in a number of years) and the harvest of Coho is very low relative to the hundreds of thousands of Coho entering the northern streams.

We believe that the issue is access and not fish abundance. A number of systems in the Susitna River are just not available to the average angler. Locations that are available become crowded and have lower success rates. We understand these issues, but putting 15% more fish into these areas will not solve the problem. The task force should concentrate its recommendations on how to improve access into northern district streams.

4. Buy back programs – We would suggest you not pursue this option.

The foundation, as we've stated, for Alaska salmon management is meeting escapement goals. Therefore, as long as these goals are maintained any fishing fleet reduction just means more fishing time for the remaining commercial effort. The end result is the same – no change in harvest per se.

Consequently, if the task force recommends a reduction in the drift fleet to a level that the historical harvest is reduced then the issues identified with Kenai River Sockeye management become more pronounced. We cannot accept this as it would impact thousands of residents of the Peninsula as well as Anchorage and the Mat/Su which rely on high sustained yields from these systems.

While some user groups want to downplay the risk of over-escapement, the data set for the Kenai and Kasilof Rivers is sound. The risk is just too great to put hundreds of thousands of Sockeye into the Kenai River to gain a minor increase in Susitna bound stocks. From a cost/benefit ratio it makes no sense. Hundreds of thousands of sockeye salmon represents millions of dollars to the Kenai Peninsula communities for little or no measurable benefit in the Mat/Su Sockeye salmon fisheries.

5. ADF&G studies in the Susitna River – We believe that ADF&G and the legislature have not been wise in how monies have been spent on research in the Susitna River.

The ADF&G has wasted hundreds of thousands of dollars on mark/recapture studies and went ahead with these studies when our group and others recommended against this approach. We favor weirs on Sockeye salmon streams to count Sockeye salmon. We also favor a beaver control program to reduce dams which block access to spawning areas; pike control programs, restoration programs for treated lakes, and strict habitat protection regulations.

Unfortunately, the legislature has continued to fund studies with little management benefit. The most recent is the studies proposed by ADF&G on Coho and Chum salmon. We would strongly recommend that these monies be redirected to more useful research/management actions in the Susitna basin. In fact, in a recent letter from the BOF chairman Jensen to Governor Palin (October 14, 2008) he stated “... *the legislature's choice of the coho and chum salmon studies was not the fault, nor even the preference, of the department*”.

As a sport fishing group we have at times appeared to be in conflict with what on the surface appears to be a benefit to sport fisherman. However, we understand from our experience and advice of the professional members of our group that the commercial fleet is a necessary component to maintain escapement goal management for all systems. We would caution the task force to keep this in mind when discussing your recommendations.

On a positive note, we would recommend that the task force examine future funding for the BOF. Our experience is that the BOF needs its own scientific staff to help them digest and understand the volumes of material they receive. The ADF&G is not capable because of reduced staffing and increasing work loads on their personnel.

We would like to thank the task force for taking these issues seriously and hope that your recommendations are well thought out and researched.

Dwight Kramer, KAFC Chairman

Cc: Governor Sarah Palin
Frank Bailey, Board and Commissions
Cora Crome, Office of the Governor
Sen. Tom Wagoner
Rep. Mike Chenault
Rep. Kurt Olson
Rep. Paul Seaton
Denby Lloyd, Commissioner of ADF&G
Mayor Dave Carey, Kenai Pen. Borough
Mayor Pat Porter, City of Kenai
Mayor Peter Micciche, City of Soldotna