



United Cook Inlet Drift Association

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January 10, 2017

John Jensen, Chairman
Alaska Board of Fisheries

Dear Mr. Jensen and Board members:

The public process for the January, 2017 Kodiak Board of Fisheries meeting is called into question by the late, untimely release of documents vital to making informed decisions regarding the management of salmon fisheries in the Kodiak Management Area and, ultimately, the salmon fisheries in Cook Inlet.

The Genetic Stock Composition 2014-2016 report (FMS16-10) and the Kodiak Management Area Commercial Salmon Fishery AMR for 2016 (FMR 16-42) were only made available to the public in late December, just two weeks prior to the Kodiak BOF meeting. The Kodiak commercial salmon AMR's for 2014 and 2015 are still not available to the public. None of the stakeholders, advisory committees, general public, public interest groups, commissions or local governments were given an opportunity to access these reports, analyze the information, prepare proposals or submit timely comments. All of these individuals and groups have been denied a fair and open public process regarding the management of these valuable salmon resources. The lack of a public process undermines any result from the Kodiak Board of Fisheries meeting.

The Genetic Stock Composition report (FMS16-10) documents that over a million Upper Cook Inlet (UCI) sockeye salmon were targeted and harvested in just a portion of the Kodiak Management Area in the years 2014-2016. The salmon tissue samples taken in 2014 and 2015 were genetically assessed and assigned to geographical origins in the fall/early winter of 2015. The genetic origins of the KMA salmon harvests for those years were known by ADF&G and not disclosed for another year. ADF&G has a responsibility to bring management issues to the BOF. To withhold information regarding a salmon management issue of this magnitude subverts the BOF's ability to make informed decisions. The Genetic Stock Composition report is the best available science and should replace the questionable data from the decades-old salmon tagging studies that are the basis for several of the Kodiak area management plans.

This is a significant matter with far reaching consequences. Science-based management, escapement goals and management plan uncertainties are created by the documented interception of at least a million salmon targeted and harvested in the KMA that are of UCI origin. How have these UCI salmon been apportioned to a river of origin within the

KMA? Have some portion of these UCI salmon been assigned to a particular Kodiak stock? If so, what was the scientific basis for apportioning some, none, or all of the UCI salmon to any local stock? How have escapement goals been affected by the interception of Cook Inlet salmon? Escapement goals in Cook Inlet are also now thrown into question. None of the UCI salmon harvested in KMA have ever entered into any scientific determination of escapement goals for Cook Inlet. Management plans, including allocations, and conservation burdens are based on achieving escapement goals. We doubt that any Kodiak or Cook Inlet management plan is appropriate or effective, given that there is a million salmon "wild card" in the system. The magnitude of this KMA interception of UCI salmon is equal to, or greater than, the actual harvests of some user groups in Cook Inlet.

This interception of UCI salmon has continued to occur and increase, even though ADF&G was instructed as far back as 1988 that the in-season management of the Kodiak salmon fishery was to minimize targeting of non-local stocks. In 1988 the Alaska Board of Fisheries created 5 AAC 18.363, the North Shelikof Strait Sockeye Salmon Management Plan, which was intended to limit the harvest of Cook Inlet and other non-local stocks within the Kodiak Management Area. The express purpose of this plan is stated in the preamble "*The purpose of the North Shelikof Strait Sockeye Salmon Management Plan is to allow traditional fisheries in the area to be conducted on Kodiak Area salmon stocks, while minimizing the directed harvest of Cook Inlet sockeye salmon stocks. The board recognizes that some incidental harvest of other stocks has and will occur in this area while the seine fishery is managed for Kodiak Area salmon stocks. The board intends, however, to prevent a repetition of the nontraditional harvest pattern which occurred during 1988.*"

Now, nearly thirty years later, the empirical and genetic evidence is clear, in spite of the intent written into the North Shelikof Plan and in the Plans for other management districts, the in-season management practices in the Kodiak Management Area are quite effective at harvesting UCI sockeye (aka "Cookies").

Now that the interception of UCI stocks in the KMA has been identified again, using genetics, can the Board of Fisheries at the 2017 Kodiak meeting take actions and create or adjust regulations that will ultimately, and significantly, affect the management of Cook Inlet salmon fisheries?

Sincerely,



Erik Huebsch
UCIDA Vice President