

To: Committee of the Whole, Group 2
From: Susan Payne, Westside gillnet permit holder
Date: January 13, 2016
Re: Proposed Revision to Karluk Escapement Goals
January 13, 2017

I have concerns regarding the ADFG proposal to increase the Karluk Escapement Goal for the Karluk River system and the effort by ADFG to open the inner Karluk area as an ammendment/RC to Proposal 60 without public discussion.

The first concern relates to the allocative implementation of this new escapement goal talked about in section 3 of Duncan Fields' RC 0045. To achieve the proposed increases in escapement numbers, ADFG conservatively manages at the front ends of both the early and late run Karluk escapements. This will delay the fishery in June and potentially in August when we switch to late run sockeye management. In both 2015 and 2016 the start dates of the Westside sockeye fishery approached the upper escapement curve that they present in the harvest strategy. The result is that we opened several days behind what we might have if they had used the lower escapement curve. In 2015, we opened on June 3 at an escapement level of 40,613 fish and in 2016, on June 2 with a Karluk escapement of 31,588 fish on June 1. In 2016, Outer Karluk opened on June 14 (two days before regulation) because ADFG must have had over-escapement concerns. If we had opened at the lower escapement level say on June 1, there may not have been the necessity to open the Outer Karluk to start mopping up escapement. In 2015 we had 136,877 sockeye over the Karluk weir by June 15, well above the lower escapement level for that date.

My second concern, new and important for your consideration, is found in the Weir In and Weir Out information. In the past, ADFG has assured me that negligible numbers of sockeye pass the weir before the Weir In dates (range May 20-27, 2006-2016). In 2015 and 2016, fish came early and travelled differently than any other year since we started set netting in 2001. In 2014, Sockeye were passing the weir immediately. People on the Westside early in May were seeing jumping Sockeye. The late run escapement is less certain because the Weir Out at Karluk stretches from September 8-29 in the eleven years from 2006-2016. In all but three years during that time, ADFG adjusted their final escapements with estimates within a day of removing the weir due to fish passing personnel after the weir had been removed. What is the contribution to the late run escapement from the period from weir removal to the end of the season October 15, 4-6 weeks after the weir is removed? We can only guess and so it seems imprudent to raise the upper escapement level of the the late run due to this lack of data and uncertainty.

I ask the Board to consider an OEG consideration for the Karluk escapement goals to consider allocation issues that impact a stationary Westside Set gillnet fleet disproportionately because we cannot move to the Karluk to mop up over-escaped fish and the uncertainty of the final escapement numbers for the Karluk due to lack of weir presence late in the season. The Advisory Council and written comments by Northwest Setnetters' Association, Toby Sullivan do not support this increase. If increases in escapement are to take place consider increasing the levels gradually or postpone so that we can discuss this in further detail and continue to evaluate this ADFG proposal in light of returns under the present escapement. Also, table/defeat Proposal 60 as amended by ADFG until the public is able to comment.