

Proposal 37 – Comments

5AAC 18.xx – New Section – New King Salmon Management Plan

If proposal 37 is revised as indicated below, UCIDA may support such a plan; however, as written, **UCIDA IS OPPOSED TO PROPOSAL 37.**

1. Kodiak and Area H application is too limiting. Doesn't include Area L.
2. Doesn't include Prince William Sound or Southeast Alaska
3. Limits are only for commercial fisheries. Recreational fisheries for Chinook must be included
4. Should include all salmon stocks: sockeye, coho, chum and pink
5. Agree on the need for some coordinated "conservation management measures" for all salmon in Areas E, H, K and L, in all districts, for all user groups.

UCIDA suggests the BOF adopt the following language For the Kodiak and Lower Cook Inlet Management Areas:

**5 AAC 18.xxx. Kodiak Area Salmon Management Plan (adopted from 5 AAC 21.363. Upper Cook Inlet Salmon Management Plan).**

**(a) Provides the department long-term direction in the management of non-local and local salmon stocks. Divisions within the department must receive long-term direction in order to accomplish their mission and plan management, research, administrative and other programs. Kodiak, Area L and Area H stakeholders should be informed of the long-term management objectives of the Board of Fisheries (BOF) for the management, development and conservation of these salmon stocks;**

**(1) consistent with the statutory priority for subsistence, the harvest of Kodiak Management Area salmon for customary and traditional subsistence uses will be provided for specific species in appropriate areas, seasons, and periods to satisfy subsistence needs; other beneficial uses, to the extent they are consistent with the public interest;**

**(2) the purpose of this Kodiak Area Salmon Management Plan is to allow harvests of Kodiak Area salmon stocks, while minimizing directed harvest of Area L, Area H and other non-local salmon stocks. The board recognized that some incidental harvest of other stocks has and will occur in this area while the seine fishery is managed for harvests of local Kodiak Area salmon stocks. The BOF intends, however, to prevent the harvest patterns which began in the late 1980s;**

**(3) to provide for the management and allocation of the Kodiak Management Area resources, the harvest of the Kodiak Management Area salmon will be governed by specific and**

comprehensive management plans adopted by the board for salmon stocks and species, on Kodiak Management Area-wide basis, for different areas, and drainages and for different types of fisheries;

(4) in adopting the specific management plans described in (2) of this subsection the BOF will consider:

(A) the need for sustainable fisheries for all salmon stocks and salmon species throughout Area L, Area H the Kodiak Management Area;

(B) the protection of the fisheries habitat both in the fresh water and the marine environment throughout Area L, Area H the Kodiak Management Area;

(C) the various needs and demands of the user groups of the salmon resources of the Area L, Area H the Kodiak Management Area.

(5) In these management plans, the BOF may, as appropriate, address the following considerations:

(A) the need to allocate the harvestable surplus among Federal subsistence, commercial and recreational fisheries; and

(B) the need to allocate the harvestable surplus within user groups;

(6) in the absence of a specific management plan, it is the intent of the BOF that salmon be harvested in the fisheries that have historically harvested them, according to the methods, means, times, locations and natal origins of those fisheries;

(7) consistent with 5 AAC 39.220(b), it is the intent of the BOF that, in the absence of a specific management plan, where there are known conservation problems, the burden of conservation shall, to the extent practicable, be shared among all user groups in close proportion to their respective harvest on the stock of concern.

(b) In this section, in the absence of a specific management plan, "Area L, Area H the Kodiak Management Area" means those salmon that move through these waters and spawn in waters draining into those areas.

(c) Notwithstanding any other provision of this chapter, it is the intent of the BOF that, while in most circumstances the department will adhere to the management plans in this chapter, no provision within a specific management plan is intended to limit the commissioner's use of emergency authority under AS 16.050.060 to achieve established escapement goals for the management plans as the primary management objective. For the purpose of this subsection, "escapement goals" includes inriver goal, biological escapement goal, sustainable escapement goal, and optimal escapement goal as defined in 5 AAC 39.222.

(d) This plan will be in effect for the entire year, January 1 through December 31.

## Kodiak Management Area Commercial Chinook Removals 2017 - 2019

### 1. Cape Igvak and Mainland Districts ONLY

- June 1 thru Sept 30

Chinook	2017	2018	2019
Delivered	1,322	374	275
Discarded	1,869	538	396
<b>Total Removals</b>	<b>3,191</b>	<b>912</b>	<b>671</b>

### 2. Kodiak Island ONLY

- June 1 thru Sept 30

Chinook	2017	2018	2019
Delivered	5,155	2,999	6,266
Discarded	7,423	4,318	9,023
<b>Total Removals</b>	<b>12,578</b>	<b>7,317</b>	<b>15,289</b>

### Total Chinook Removals - Kodiak Management Area Only

- Entire Season - June 1 thru Sept 30

Chinook - commercial	2017	2018	2019	Totals
Catch	19,400	10,000	19,600	49,000
Delivered	6,477	3,373	6,541	16,391
Discards (72% Mortality)	9,326	4,857	9,420	23,603
<b>Total</b>	<b>15,803</b>	<b>8,230</b>	<b>15,961</b>	<b>39,994</b>
<b>Chinook - sport</b>				
Salt Water Catch	32,229	30,000	30,000	92,229
Salt Water Harvest	11,065	10,000	10,000	31,065
Discards (15% Mortality)	3,175	3,000	3,000	9,175
<b>Total</b>	<b>14,240</b>	<b>13,000</b>	<b>13,000</b>	<b>40,240</b>
<b>Total Removals</b>	<b>30,043</b>	<b>21,230</b>	<b>28,961</b>	<b>80,234</b>

Note #1: Estimated Values in Italics

