

Israel Payton, Board of Fisheries
Alaska Department of Fish and Game
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Mr. Payton,

I'm writing you concerning the increased fishing pressure for rainbow trout on the Naknek river. In my opinion, I fear that the current pressure is unsustainable if left unchecked. I have been encouraged to write you as I've been informed the Board of Fish on which you sit has had little to no input from private fisherman. In 1981, my father built a cabin on Pike Lake near Lake Camp and my family members have fished the Naknek for all species of salmon and trout since. Today, I also own a cabin on Pike Lake and hope to continue the fishing tradition with my wife and children.

To add background and perspective, my observations will be primarily limited to 2000 to the present as that is about when I took an avid interest in fly fishing for rainbow trout on the Naknek. From 2000-2010 or so, I didn't fish for rainbows nearly as often as I do now. However, for the past 10 or so years, I would estimate I spend 15 days every fall fly fishing for rainbows on the Naknek. I have always preferred to wade the holes above Rapids Camp, swinging a fly as opposed to fishing from a boat. Depending on the water level in any given year, there are only between 10-12 wadable fishing holes from Rapids Camp upriver to Lake Camp.

Around 2000, I rarely would encounter more than 5-7 boats on any given day during the month of September. In my estimation, that number increased to approximately 10-15 boats per day by 2010-12. Still, I found it easy enough to find room to fly fish by wading as other fisherman prefer to fish from boats. On an average day, I would hook 6-10 rainbows; an exceptional day would be over 20 fish. Of those, several would be over 25", and occasionally I landed a "trophy" rainbow over 30". In October, it was common to nearly have the the river to yourself prior to 2010-12.

My observation is that the rainbows tolerated the increase in pressure from 2000 to 2010-12 and the fishing experience did not appreciably suffer. I would estimate that at least 90-95% of the trout fisherman were guided. Assuming 2-3 fisherman fished from around 15 boats, one can estimate that 30-45 fisherman per day fished rainbows on the river upstream from Rapids Camp.

Fast forward to 2015-19, from mid-September through mid-October, I rarely witnessed less than 40-45 boats on any given day, and have been told by others that over 50 boats have been counted on occasion. The increased number of fisherman has not only adversely affected the trout population, but poor fishing etiquette with handling trout and operating boats under power repeatedly over spawning salmon disrupts them and the feeding pattern of the trout who depend upon the salmon.

For the past three years in particular, the rainbows have failed to show up on the Naknek in the numbers I've historically witnessed. 2019 was particularly poor despite perfect conditions including low clear water and mild fall temperatures. The increase to 40-45 boats by 2015 from 10-15 boats in 2010 represents three times the number of fisherman. I fished on the river for approximately 15 days and only caught 6-7 trout over 25." It was not uncommon to fish all day and maybe have a bite or two. The few fish I did land were mostly between 10-17." Interestingly, I caught very few rainbow trout between 17" and 24," which represent the next generation of spawners. Moreover, I observed very few fish being caught by others which I confirmed in subsequent conversations with other fisherman. Finally, fishing pressure in October was minimal before 2010, but now the first 2 weeks in that month see's some of the greatest pressure.

So, what immediate actions can be taken to reduce the pressure on the Naknek River rainbow trout to ensure the fishery's viability for future generations? I offer the following resolutions to take effect prior to the 2020 rainbow fishing season until a long term comprehensive management plan can be implemented.

For reference, I found Alaska Administrative Code 5 AAC 57.140, "Kenai River guiding and guided fishing requirements in the Kenai River Drainage fishing area", to be instructive. I have borrowed certain regulatory language to construct my proposals. Also, I believe adopting aspects from the regulatory guidance under 5 AAC 57.140 would be benefit the Naknek drainage since it has dramatically improved the fishing conditions and successfully reduced pressure on the Kenai. As a result, the Kenai rainbow trout population remains stable and fishing consistent. Ultimately, unlike the Kenai, I believe a regulation should be enacted limiting the number of rods for guided sport fisherman during the season for rainbow trout on the Naknek. But until a study resulting in a comprehensive system wide plan can be enacted, I submit the following proposals for immediate consideration:

1. Upstream from ADF&G markers located 1/2 mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, a person may not sport fish from a registered guide vessel on any Sunday from March 1 through October 31, and on any Monday in September and October.
2. Upstream from ADF&G markers located 1/2 mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, sport fishing from a registered sport fishing guide vessel is permitted only from 8:00 a.m. to 5:00 p.m. from March 1 through October 31 (or October 7 if proposal #3 below is adopted).
3. Upstream from ADF&G markers located 1/2 mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, a person may not sport fish from a registered guide vessel from October 8 through December 31.
4. Use of unbaited barbless hooks only for rainbow trout.
5. Trout stamp purchase (similar to king stamp) to track number of guided/non-guided fisherman and their catch. (Send follow-up survey to inquire about size, when, and where fish caught).

6. Upstream from ADF&G markers located 1/2 mile above Rapids Camp to ADF&G markers at Trefon's cabin at the outlet of Naknek Lake, catch and release only, no retention of rainbow trout.
7. Fisherman and Guide education concerning handling and release of rainbow trout, and proper fishing etiquette amongst fisherman. Maybe each guide should be required to take an online seminar sponsored by the ADG&G about proper etiquette and fish handling?

I hope my letter sufficiently outlines the very real concerns the Naknek River rainbow trout fishery faces. By implementing some safeguards, even by emergency order if necessary, we can reduce the pressure on these magnificent fish to preserve the fishery today and for future generations. There are a few sport fishing lodges in particular that despite acknowledging the rainbow population is in jeopardy, resist any regulation whatsoever in fear it will affect their profitability. However, if regulatory action isn't taken immediately, it's possible the area would have to be closed to rainbow trout fishing entirely, which would adversely affect the region's economy that relies substantially on sport fishing tourism. Finally, it is my understanding that there are a number of rivers in the Bristol Bay trout fishery that suffer from increased and unsustainable pressure. I hope the proposals I submitted herein can be considered for system-wide enactment. I am available to answer any questions by email, in person, or by telephone if I can be of any assistance. Regards,



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