

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-2 SALMON FMP

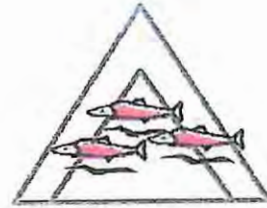
	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Dale Kelley	AK Trollers Ass'n
2	BOB MACHANOT	SELF PEN
3	David Martin	Self/UCIDA
4	Paul Gronboldt	Self
5	Paul A. Shaduro II	Kenai Peninsula Fish Assoc.
6	Paul Dale	AK Salmon Alliance
7	JEFF FOX	AK SAL. ALL.
8	Erik Huebsch	UCIDA / Self
9	Roland Mann	UCIDA / Group
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Alaska Salmon Alliance

"Working For Alaska's Salmon Future Today"

P.O. Box 586 Kenai, Alaska, 99611



December 4, 2011

North Pacific Fishery Management Council
Eric A. Olsen, Chairman
605 W. 4th Avenue, Suite 306
Anchorage, AK. 99501-2252

Re: Amendment 12: Revisions to the Fishery Management Plan for the Salmon Fisheries in the EEZ off the Coast of Alaska, November 2011.

Dear Chairman Olson and Council Members,

The Alaska Salmon Alliance is a new organization from the commercial fishing and processing sector which has been formed to help represent our interests in the various governmental and industry forums. We are a diverse group participating in many of the state managed salmon, herring, shellfish and ground fish fisheries as well as federal fisheries for halibut, shellfish and ground fish. Our group is responsible for several hundred million dollars in seafood sales annually with hundreds of full time and thousands of seasonal employees. These fishery resources are extremely important to us from a business as well as from a personal/social standpoint. It is our belief that all fishery resources harvested from the coastal waters off Alaska should be managed for Maximum Sustained Yield to benefit all users to the maximum extent possible in a manner consistent with state and federal law. In addition, we desire the best scientific methods and standards be used in these management programs to ensure stable and predictable fishery resources on which to base our business decisions. While commercial fishers can generally deal effectively with wide fluctuations in annual resource availability, these wide fluctuations create a tremendous burden to the processing sector of the industry. In the Cook Inlet salmon fishery annual run sizes of between 4-8 million can have an average yield of 6 million, so can a run size of between 2-10 million, but the 2-10 million scenario places a tremendous burden on processing and jeopardizes quality which impacts markets and profitability. In Cook Inlet, where regulatory and management practices are the most unstable, many processors such as Wards Cove, Dragnet, Ocean Beauty, Keener Packing, Deep Creek, R&J Seafood and other smaller processing plants have closed and remain empty, as a result of this instability.

For 35 years the MSA has been the law that governs how fishery resources are managed in all federal waters around the entire country. In 1976, when the MSA was first passed, the State of Alaska demanded that congress institute a 200 mile EEZ to remove foreign fishing between 12 and 200 miles from shore because salmon stocks were so overfished. At that time the NPFMC created a FMP for salmon and closed the entire EEZ off the coast of Alaska except in 4 small areas, one in south east Alaska and 3 in the West Area. These exceptions remained in effect in 1991 when the FMP was amended and the state signed a Memorandum of Understanding with NMFS that they would comply with the requirements of MSA. The problem is that for 21 years no one has enforced the agreements or MSA compliance. In 2011 the NPFMC must again review the FMP because congress wants accountability measures and annual catch limits. Now the council decides, after 35 years and 11 other amendments, that three of the net area exceptions are no longer needed in the FMP. We as stakeholders do not believe this is an acceptable solution. We believe the process was rushed, did not have the benefit of valuable stakeholder input and that Alternative 3 fails to meet important national fishing policy objectives as mandated by MSA.

In the MSA, the council, NMFS and other entities of the federal government are mandated to manage anadromous fish stocks under NS1 for MSY "throughout their range". When fish hatch and leave state waters they spend between one to four years in the EEZ where they are purportedly managed for MSY. They can go into the waters "beyond" the EEZ and they are still managed for MSY, but when they return as adults and are harvested in fisheries that occur in state waters there is no such mandate for MSY even when part of the fishery is in the EEZ. Instead, in most cases the State of Alaska manages only for SY, any level of sustained yield. This is contrary to the intent of MSA. There is only one method where anadromous fish stocks can be managed according to the MSA standards throughout their range, for MSY under NS1 and that is if NMFS and NPFMC create an FMP that actually complies with the intent of MSA and mandates the State of Alaska to comply also. ADF&G needs to set escapement goals for MSY and manage to MSY. The Alaska State Board of Fisheries must also comply with MSA standards and requirements in allocating the harvestable surplus of salmon and must also consider the effects on the fishing communities while doing so or there is no compliance.

In making these statements we also want to be very clear that we do not want day-to-day management by the federal government. We want federal oversight in an FMP to ensure compliance with MSA and provide stability to the fisheries in the State of Alaska. There are many ways to achieve compliance short of preemption. For example, Federal Aid, Sustainable Salmon Fund and Dingle/Johnson monies can be withheld until the state makes changes to existing management practices. If that fails, NMFS can preempt state management as necessary as they already have done with subsistence.

In closing the EEZ off the entire coast of Alaska the council has taken a specific management and conservation measure without any ACL's or AM's contrary to MSA. In order to achieve yield there must be a fishery occurring somewhere and that fishing should comply with MSA for anadromous stocks throughout their range. In the West Area under Alternative 3 the council will surrender the sovereign rights and purposes of exploring, exploiting, conserving and managing all fish resources within the EEZ, which is the stated purpose of MSA, to the state without direction, oversight or any accountability measures at all. This proposed plan states on page 27

that “NS1 is achieved by the State’s scientifically-based approach for achieving the biomass level necessary to produce MSY.” However, on pages 123 to 133 of the same document it states that between 91 and 93 percent of the time the state does not set an escapement goal for MSY. Of the seven to nine percent of the goals set for MSY the state misses the goal range 40-50 percent of the time. In essence between three and five percent of the stocks for which there are escapement goals are actually achieving MSY. If the council passes this FMP as revised in Amendment 12 the Director of the NMFS or the Secretary of Commerce should send it back to the council for extensive revisions. Perhaps this time stakeholders could be involved in the process.

Thank you for your time and consideration of our comments and concerns.

**David Brindle, President
Alaska Salmon Alliance**

December 7, 2011

North Pacific Fishery Management Council
Eric A. Olsen, Chairman
605 W. 4th Avenue, Suite 306
Anchorage, AK. 99501-2252

Re: Amendment 12: Revisions to the Fishery Management Plan for the Salmon Fisheries in the EEZ off the Coast of Alaska, November 2011.

Dear Chairman Olson and Council Members,

Salmon are different than most other marine fish under MSA and must be managed throughout their range according to MSA including the Ten National Standards, in the EEZ, international and state waters, that is what throughout means. It would appear that the state concedes this point in volunteering that escapement goals meet the requirements of ACL'S. While the council has authority only in the EEZ, NMFS, NOAA and the secretary have the responsibility and authority over the EEZ, international waters and into state waters if necessary.

The 1990 FMP was legal for two reasons, at the time the state escapement goal policy only allowed management for MSY and only allowed a goal to change if it would increase yield. Secondly the state signed a MOU agreeing to manage according to MSA and managed for those goals at a reasonably high level. In adopting the Sustainable Fisheries Policy in 2000 which allows for SY goals the state is no longer in compliance with that agreement or MSA and now that accountability measures are necessary the entire state should be re-evaluated to see if MSA standards are being met.

This FMP is for the entire state not just southeast, you have taken specific management actions by closing the EEZ in all of Alaska. In 1976 that was necessary, stocks were overfished; today 30-40 percent of all escapement goals statewide are exceeding the upper end of the range. We call that over-escapement and it has consequences, lost yield today and lower production 4-5 years later. MSA never envisioned under-harvest, however if it occurs at a rate too high, perhaps you need to reopen parts of the EEZ or get the state to ramp up fisheries to achieve MSY, that is why you need a comprehensive FMP. Under Sec. 303 Required Provisions any fishery management plan which is prepared by any council or by the secretary with respect to any fishery shall address 15 provisions including ACL's and AM's. You have a FMP whether you recognize it or not, which means you can not simply defer authority to the state by omitting the net areas in the west they need a delegation according to MSA.

Since I may run out of time let me address the point now, **no one wants federal management nor do we want the whole EEZ reopened.** We want what we were supposed to get originally in 1976 and 1990, state management with federal oversight to insure MSA guidelines are met to some acceptable standard set in a comprehensive FMP.

The FMP's proxy for ACL's is the State of Alaska's escapement goals. These goals are not all set for MSY, in Southeast only 63% are set for MSY the rest 37% are thought to be sustainable, in Central Region 4% are set for MSY the rest 96% are thought to be sustainable, AYK 16% are set for MSY and Westward 21%, that is not an acceptable level of MSY, that is why you need a FMP, we don't know what level you deem acceptable. These goals are what we manage for, we still need to know how well we achieved meeting them.

Accountability measures are also necessary; while we don't know how well the state has done with respect to MSY we do have information for escapement goals in general in the Munro/Volk report.

In SE an average of 51% of the goals are not achieved 17% under and 34% over between 2002 and 2010.

In Central region an average of 53% of the goals are not achieved 15% under and 38% over between 2002 and 2010.

In AYK an average of 58% of the goals are not achieved 26% under and 32% over between 2002 and 2010.

In Westward an average of 54% of the goals are not achieved 15% under and 39% over between 2002 and 2010.

No one knows whether that is acceptable without a comprehensive FMP.

And finally we already have dual management; USFWS preempted subsistence in some rural areas and manages subsistence fisheries under ANILCA which also sets the standard of MSY. The EEZ is not closed for subsistence, they may have fisheries there you haven't considered or may be in violation of ANILCA if they are managing to one of the states SEG goals, they should at least be at the table. In addition since there has not been an annual review of the FMP in over 20 years and the 1990 FMP implies that it covers only 4 areas no one in the rest of the state is even aware of MSA or that they may have an interest in this meeting. For these reasons you should table this action.

Thank you for your time and consideration of these comments and concerns.

Sincerely,



Jeff Fox

Accountability Measures, Number of escapement goals by region with percent above or below goal range, 2002-2010.

So. East Region	Year									Ave.
	2002	2003	2004	2005	2006	2007	2008	2009	2010	
Total # Goals	35	38	37	38	41	41	38	48	48	
#Below Range	5	2	2	5	3	11	16	15	5	
%Below Range	14%	5%	5%	13%	7%	27%	42%	31%	10%	17%
#Above Range	17	24	15	13	17	10	7	7	10	
%Above Range	49%	63%	41%	34%	41%	24%	18%	15%	21%	34%

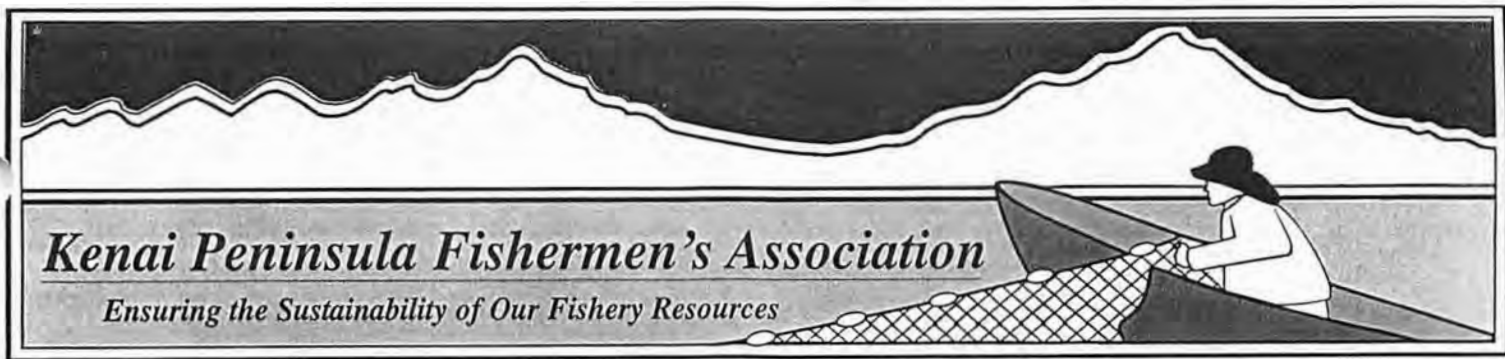
Central Region	Year									Ave.
	2002	2003	2004	2005	2006	2007	2008	2009	2010	
Total # Goals	99	96	99	97	96	97	97	101	92	
#Below Range	11	7	8	9	7	14	20	29	27	
%Below Range	11%	7%	8%	9%	7%	14%	21%	29%	29%	15%
#Above Range	44	51	48	49	44	29	24	27	15	
%Above Range	44%	53%	48%	51%	46%	30%	25%	27%	16%	38%

AYK Region	Year									Ave.
	2002	2003	2004	2005	2006	2007	2008	2009	2010	
Total # Goals	57	57	63	61	59	61	60	60	60	
#Below Range	19	19	15	9	8	5	24	21	18	
%Below Range	33%	33%	24%	15%	14%	8%	40%	35%	30%	26%
#Above Range	14	13	15	33	32	29	13	12	14	
%Above Range	25%	23%	24%	54%	54%	48%	22%	20%	23%	32%

Westward Region	Year									Ave.
	2002	2003	2004	2005	2006	2007	2008	2009	2010	
Total # Goals	49	49	48	48	48	48	52	52	53	
#Below Range	5	6	6	4	6	5	14	13	11	
%Below Range	10%	12%	13%	8%	13%	10%	27%	25%	21%	15%
#Above Range	27	35	27	25	13	13	14	10	6	
%Above Range	55%	71%	56%	52%	27%	27%	27%	19%	11%	39%

Proxy for ACL's, Number, type and yield level for the State of Alaska's escapement goals by region.

Region	Type of Goal					Total	%MSY	% SY
	MSY BEG	SY SEG	SY SEGLB	SY OEG	SY MT			
S.E	31	11	5	2	1	50	62%	38%
Cent	4	87	12	4		107	4%	96%
AYK	12	43	12	3	3	73	16%	84%
Kodiak	12	34	11	0	0	57	21%	79%
Total	59					287	21%	79%



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December 07, 2011

North Pacific Fishery Management Council
605 W. 4th Avenue,
Suite 306
Anchorage, Alaska 99501-2252

Chairman: Eric A. Olson

The Kenai Peninsula Fishermen's Association (KPFA) is an organization that primarily represents the interests of the 745 setnet permit holders who fish for salmon in state waters within Cook Inlet, southcentral Alaska. Our mission is clearly directed to 'Ensuring the Sustainability of Our Fishery Resources'.

We have reviewed the public review draft EA/RIR Amendment 12: Revisions to the Fishery Management Plan for the Salmon Fisheries on the EEZ off the Coast of Alaska.

It is apparent to us that information published as it relates to Alaskan fisheries management is unfortunately inaccurate and without direct adherence to the historical record. The attempt to justify State management in relationship to Federal laws and policy is truly a fairy tell immersed in denial.

Within the: *Draft FMP for the Salmon Fisheries in The EEZ Off Alaska* section 4 describes roles of agencies that must be coordinated in managing the salmon fisheries. "Chief among these are the US Department of Commerce". Further "The Magnuson-Stevens Act assigns to the Secretary of Commerce the authority to approve fishery management plans and implement them with Federal regulations." In "Chapter 9 describes the ways in which the Council and NMFS will monitor State management measures for consistency".

This is exactly what the objectives of our fishery support. It is our intimate understanding of the Alaska Board of Fisheries (BOF) process that brings us to this desperate point. It is not our intent to slight the Alaska Department of Fish and Game (ADF&G), rather it is our belief that the Department should manage on the best available science. I personally have experienced the State BOF process for 40 years and would challenge to a debate any

council member, staff person or state manager, past BOF member that the current Fisheries Board is not dysfunctional, unprofessional, unqualified and wrought with special interest influence. These are not tenants to sound long term sustainable fisheries management. This is the classic Tragedy of the Commons in every regard.

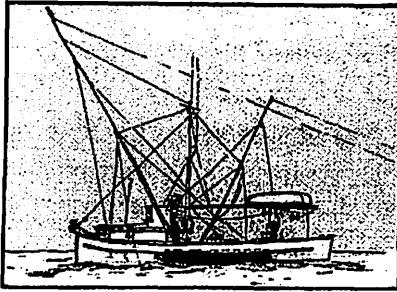
We remain disenchanted with the process and we seek a solution through concepts of the Public Trust Doctrine. Is it appropriate for a State to alter the efficiency of an established intrastate commercial salmon fishery for the full on exploitation of a discreet stock? Does this not violate the very essence of the conservation as defined within the MSA and the 10 National Standards? If the State cannot help itself from its own destruction of a finite resource isn't that the role that the MSA already has defined?

KPFA believes that if the targeted exploitation continues this issue and other similar: we will be back before the Secretary of Commerce in a much less palatable way.

We would like to state our objection to implementing Alternative # 3 with out putting in to affect a compact; a binding agreement that directs the State to manage the resource with full considerations of the 10 National Standards. That will incorporate measures that will account for all resource users so that we can remain proactive in sustaining high yields. That incorporates the three major directives in the Fishery Impact Statement (FIS) and the requirements of assessing fisheries described within the components of an FMP. That clearly establishes proactive measures to insure that we do not have yet another collision with the Endangered Species Act (ESA).

Submitted by:

Paul A. Shadura II
Board of Director



Alaska Trollers Association

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December 7, 2011

Chairman Eric Olson
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Olson and Council Members:

The Alaska Trollers Association (ATA) has reviewed the *Initial Review Draft Environmental Assessment for Amendment 12: Revisions to the Fishery Management Plan for the Salmon Fisheries in the EEZ off the Coast of Alaska (EA)* and the *Draft Salmon Fishery Management Plan (FMP)*. **ATA supports those sections of the Council's Preferred Preliminary Alternative (PPA) relative to the East Area EEZ.**

General Comments

ATA represents hook and line salmon fishermen who operate in state and federal waters off Southeast Alaska. Only the troll fishery has been directly managed under the salmon FMP.

The troll fleet, as well as every other salmon fishery in our region, is managed on salmon stocks that range from the Pacific Northwest to Alaska. Therefore, the health and well-being of Pacific salmon – and how they are managed – is something ATA takes quite seriously. It is good to see clarification in the EA that the Council does not intend to allow unregulated fishing in the EEZ under the revised FMP.

ATA appreciates that the Council and NOAA goals in the decisional documents appear aimed at securing continued deferral to the state regulatory structure and Southeast management program. The troll fishery is already heavily managed and there is no need to further encumber the fleet with new rules, or saddle the Council and agencies with additional tasks.

The draft FMP and EA provide a good overview of the troll fishery and the management structure and rationale. We do wish to note that the timing of the large review drafts in relation to the troll fishery made it quite difficult to prepare timely comments, and certainly not with any level of detail. In addition, the Dutch Harbor meeting where the FMP was discussed was simply beyond reach for most salmon fishermen, particularly those from Southeast.

West Area EEZ

ATA will refrain from commenting on the PPA's specific recommendations for the West Area EEZ, since we are relatively unfamiliar with those fisheries. However, an obvious question is whether it's appropriate to lump all three Westward areas into one, or even to consider the East and West EEZ under one FMP, particularly given substantial differences between fisheries and circumstances. Additional questions and concerns have been raised about the PPA's treatment of the Westward areas by some fishery representatives. ATA hopes that the Council will give their input adequate consideration, even if it means extending the time to deliberate and act upon the FMP. The exception to ATA's support on this matter would be if such a delay would negatively impact the current federal deferral to state management, or would otherwise put at risk East Area EEZ troll and sport fishermen.

East Area EEZ

ATA has been involved in the FMP since its inception and is also familiar with the host of other international, national, and state laws that impact East Area EEZ fisheries. Our members are concerned about the ramifications of new Magnuson-Stevens Act (MSA) requirements to impose annual catch limits (ACL) and accountability measures (AM) for salmon, which are very different than the other species managed by the Council. We believe the state has lined out a strong case as to why state management provides a reasonable and responsible 'alternative approach' to ACL's and AM's, as allowed under the MSA. The state's abundance based program relies on vigorous reporting, inseason assessments, and escapement goal management. This allows fishery managers to

react to annual variations in abundance, while also securing harvest. The health of Southeast stocks and fisheries is a testament to the state's methodology. We encourage the Council to embrace ADFG's program in the East Area EEZ, particularly when establishing status determination criteria intended to achieve National Standard 1.

As you know, trollers are subject to an intricate management program. While fewer fish are landed in the EEZ than in state waters, you can see that those fish make up a significant portion of many trollers earnings. It is important for the stability of our fleet and local fishing communities that the Council work to avoid additional, unnecessary, rules that could disrupt our fishery and fishing patterns. We believe the existing state management program offers the best system to protect both salmon and salmon fisheries. It appears that the East Area EEZ portion of the Council's PPA attempts to secure this system and, if so, garners our support.

Economic Impacts

The Alaska troll fleet ranks among the largest fisheries on the West Coast. 85% of troll permit holders are resident Alaskans and most live in small communities in the Southeast region.

In 2011, troll permits made up 11% of all Alaska permits fished - for all commercial species. In addition, 11% of the state's resident commercial permit holders who fished were trollers; who, in turn, employed 4% of all Alaska deckhands. In addition to fishing, the support jobs generated in the processing and private business sectors, state and federal agencies, and USCG provide important economic opportunity for our region.

Trollers are known for delivering a premium salmon product to market and the ex-vessel value of troll caught salmon is typically much higher than the statewide average. As an example, in 2006 the troll fleet was responsible for 9% of Alaska's total salmon revenues and contributed about \$1 million in raw fish tax to the state general fund. Preliminary estimates show an ex-vessel value of \$28.3 million for the 2011 troll harvest, and a 10-year average of \$25 million per year for both state and federal waters. This does not account for the impact of those dollars as they are distributed throughout the local economy.

The EA reveals a lack of data on the sportfish side and indicates that very little sportfishing occurs in the East Area EEZ. Therefore, the sportfish economic data provided was puzzling and we question its relevance, as it is based on estimates from an economic study covering the guided sportfishery in all of Southeast. The sport data also appears to include adjustments for economic multipliers, in stark contrast to the ex-vessel values offered for the troll fishery. There is no question that the guided sportfish industry is economically important to Southeast, and the information provided supports that. However, we encourage the Council to use a better 'apples to apples' standard when providing estimates of economic value for FMP fisheries.

In conclusion, **ATA fully supports ongoing deferral of salmon FMP management authority to the State of Alaska and supports the East Area EEZ portion of the PPA.** Alaska's robust salmon program is most appropriate for the ongoing management of Southeast fisheries. The process is dynamic and proven; providing the best set of tools and oversight to achieve the goals of the national standards embodied in the MSA. We hope you agree and will work to ensure that no change occurs in the Southeast fishery as a result of revising the FMP.

ATA looks forward to working with the Council and agencies as this matter progresses. Please don't hesitate to contact me if I can be of assistance in any way.

Best regards,



Dale Kelley
Executive Director



United Cook Inlet Drift Association

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December 2, 2011

North Pacific Fishery Management Council
Eric A. Olsen, Chairman
605 West 4th Avenue Suite 306
Anchorage, AK 99501

Re: Amendment 12: Revisions to the Fishery Management Plan for the Salmon Fisheries in the EEZ off the Coast of Alaska November 2011

Dear Chairman Olson and Council Members,

United Cook Inlet Drift Association is a for-profit association formed to help represent the interests of commercial fishermen of Cook Inlet in various governmental and industry forums. It is our belief that all fishery resources harvested from the coastal waters off Alaska and all anadromous fish throughout their range should be managed for Maximum Sustained Yield, as required by the MSA. We are a federally recognized commercial fishery operating in the EEZ of the United States. In addition, we desire the best scientific methods and standards be used. To that end, we are woefully disappointed in this revision of the FMP and see it as a large step backwards! Whole sections were dropped from the 1990 FMP, which essentially subvert MSA intent, create confusion and possibly create loopholes which may needlessly endanger fish stocks and our commercial harvesting activities. Much of this 325 page document appears to be an “infomercial” written by the State of Alaska exalting itself for the job it has done. The State could do a reasonably good job, if it was given proper oversight from the council with regards to requirements of MSA. We have noticed a growing bias for the last 10 – 15 years away from MSY-based management in favor of Sustainable Yield (SY) levels or no management at all for most stocks to favor sport fishing interests at the expense of the commercial fishing communities in many areas of the State. We support state salmon management, but feel that NPFMC and MFS oversight to enforce MSA standards is imperative. To that end, we feel that the NPFMC preferred preliminary alternative, Alternative 3, is fraught with problems and should be dropped immediately. The only reasonably effective, legal and truly comprehensive alternative is Alternative 2. In that alternative, the three net area exemptions in the West Area should remain in the plan and specific conservation and management measures, ACL’s and AM’s included. We do feel that the 1990 FMP should be used as a template and updated/amended in a

comprehensive fashion and the November 2011 draft should not be used as it is deficient in many areas which will be at least partially detailed below.

Under Alternative 3, there appears to be an attempt at a slight of hand magical trick to eliminate the three net fishing exclusions without having the council be responsible for covering them under the FMP. In order to accomplish this, you are willing to create a loophole that would allow non-State registered vessels to fish in the three EEZ net areas without any regulatory oversight – no seasons, gear requirements or reporting requirements – basically opening large portions of the state fishery to unregulated pirates with no checks and balances. Does that really seem like a good tradeoff? In order to accomplish this slick trick, a few more changes are going to be necessary. The title of this FMP states: “Fishery Management Plan For The Salmon Fisheries In The EEZ Off Alaska” and the map on page 6 includes the entire EEZ from the Canadian border in the south to the Canadian border in the Arctic. The Management Area covered by this FMP under Chapter 2.1 states the entire EEZ off the Alaska coast and the fisheries that occur there, except for the three defined net areas, are covered by this plan, and as such the entire state needs to be addressed by the national standards and the specific conservation and management measures in Bristol Bay, AYK, Chignik and Kodiak as required by Sec. 303, Contents of Fishery Management Plans; (a) Required Provisions; Any fishery management plan which is prepared by any Council, or the Secretary with respect to any fishery shall address 15 different content areas. In addition, by excluding the three net areas, Council is creating a new class of salmon management plans, which are not consistent with Constitutional law or MSA Sec. 303 requirements.

By excluding the three traditional net areas and opening the area to unlicensed fishermen of the State, you are violating NS4 because this unregulated open fishery is available to non-residents but not State of Alaska residents. Seems like an extreme measure to circumvent the intent of MSA. As a side note, Chinook salmon are generally deeper than current legal gear in the three net areas, and opening these areas to unregulated gears and depths will certainly increase the Chinook salmon harvest in these areas.

The preparers of this document, Amendment 12 dated November 2011, have gone to great lengths to state that an FMP is required only for overfished fisheries, that regulation would serve some useful purpose and that present and future benefits would justify the costs. That is the minimum required under MSA; the NPFMC can create an FMP whenever they determine it is necessary. However, in this case an FMP already exists, it has just not met the current, required MSA standards or been reviewed for over 20 years. Upon review of the data supplied in this document, it is obvious that the benefits would far outweigh the costs of an additional employee-year (100K). Beginning on page 123 of this document, the State’s escapement goals are listed by type and species. In the Eastern Area, where the FMP attempts to enforce the national standards and management measures, 63 percent of their salmon stocks that have escapement goals are set for MSY (BEG) as required by MSA. In the West Areas, where no standards or management measures are delineated in the FMP, that figure is 7 percent in PWS, 9 percent in UCI and 8 percent in Area M. That means that for the stocks with escapement goals, 91 – 93 percent of the goals are sustainable at some other level and not set to achieve MSY as required by NS1 of MSA. In addition, escapements are only achieved within the SY escapement goal ranges 50 percent of the time. These escapement goals are generally Sustainable Escapement Goals set as a range that is much wider, both below and above, or in an increasing number of cases, just a

lower bound SEG. All of which allow over and under fishing levels to occur without specific conservation or management actions, counter to NS1 guidelines. The benefits of federal oversight seem clear in this case. There are no AM's identified or delineated in the current proposals or analysis.

The current FMP proposal and analysis focuses on Chinook and Sockeyes. There is no analysis of Chum, Pinks and Coho stocks. This proposal is inadequate in the discussion of these three species. Steelheads are totally ignored by the current proposal.

Under Chapter 2.5.1, on page 27 and 28, the Review document lists 7 criteria from 50 CFR 600.340 to evaluate whether an FMP is needed;

1. The importance of the fishery to the nation and regional economy – the Alaska Salmon fishery is very important to the nation.
2. The condition of the stocks and whether the FMP can improve or maintain that condition – stocks in the East are definitely managed to a higher standard with more scientific review and scrutiny than stocks to the West, which need help in addressing the State's failure to manage for MSY.
3. The extent to which the fishery could be or is already adequately managed by the State consistent with the policies and standards of the MSA – as outlined above and below, the State does not manage according to MSA standards in any area of the State, but has the best programs in place in the east area where the FMP and Pacific Salmon Treaty are in place.
4. The need to resolve competing interests and conflicts – an FMP would certainly help clarify and possibly help resolve the continued competing interests in these three net area fisheries.
5. Can an FMP produce more efficient utilization – by clarifying that MSA standards apply throughout the salmon's range and that MSY is the standard to achieve it certainly should boost production.
6. Can an FMP foster orderly growth in a developing fishery - does not apply, these fisheries are fully developed.
7. Costs associated with an FMP vs. Benefits – benefits far outweigh the costs, especially if the FMP is fully and clearly developed in an honest and unbiased fashion and management is deferred to the State with Federal oversight. The only true cost difference would be developing the FMP and annual reviews which are already required under MSA.

Utilizing these criteria, an FMP would be necessary in 7 of the above 7 criteria and in all four areas concerning the six salmon species. Deletion of the West Area net area exclusions is fraught with problems. The review fails under all alternatives except Alternative 2.

The council, ADF&G, NOAA, NMFS and Alaska Department of Law have used much of this document, arguing that the only entity that can manage these salmon stocks "seamlessly" is the Department of Fish and Game, which is a fairly ridiculous claim. First, these stocks spend much of their life cycle in the EEZ and in International Waters that the State has no control over. Secondly, most of the spawning grounds in UCI, Area M and PWS are in Federal Parks and

Refuges that the State has little control over. And lastly, MSA requires that anadromous stocks be managed as a unit throughout their range for MSY.

Under the current FMP proposal, escapement goal management is being proposed as an alternative to NS1 and also a means of compliance to MSY, ACLs and AMs. How can escapement goals achieve compliance with NS1 unless there is Federal (MSA) oversight? Without Federal oversight, review and involvement, there is no means of achieving compliance with NS1. It is the State's position that they have no need to manage salmon to MSA, NS1 or MSY guidelines. There is an embedded conflict with the proposed FMP – the State proposes escapement goal management as an alternative to NS1, while at the same time telling everyone they (the State) have no intention of having escapement goals that meet NS1 guidelines. The State has chosen to remove or omit escapement goals on numerous salmon stocks.

The State requirement under the Constitution in Article 8 Section 4 states: "Fish, forests, wildlife, grasslands and other replenishable resources belonging to the State shall be utilized, developed, and maintained on the **sustained yield principal**." Nowhere in State law is the state required to manage for MSY as required under MSA. Unless the FMP is retained in all four areas and clear conservation and management measures are developed as required by MSA, the State does not have to comply with MSA. At the most recent BOF meeting for UCI, Lance Nelson, State Asst. Attorney General, and one of the listed preparers of this Amendment 12 document volunteered on the record on March 5, 2011, 2:50 p.m. that "*It is the State's position that MSA does not apply to this fishery. The fishery management plan doesn't purport to manage these fisheries on its face and so there are plenty of other things you can think about when it comes to what kind of sustained yield you want*" and yet he is one of the experts helping prepare the FMP revisions. This appears to be a clear conflict. Rather than delete needed sections of the FMP, the Council would be better served to expand on the 1990 FMP, retaining all four areas and clarifying in even stronger terms that MSA standards are to be met. In fact, a truly comprehensive plan would clarify that MSA applies to all salmon stocks in Alaska, and that even those areas without EEZ fisheries are required to be managed for MSY. Since all of these salmon stocks spend portions of their life cycle in State, Federal and International waters, Federal oversight and coordination through an FMP is imperative, at a minimum in the areas where there are portions of the fishery in the EEZ.

From the Amendment 12 document dated November 2011, one would be left with the impression that stocks in the western part of the State are healthy and not in need of any conservation or management measures. However, when the stocks of concern are examined (p.121), seven of the 33 stocks in UCI with escapement goals were determined to be Stocks of Concern, or roughly 21 percent of the UCI stocks. One of which, Susitna Sockeye, has resulted in numerous closures of the drift fishery in the EEZ to aid in achieving this goal. The primary problem that resulted in the listing of this stock was determined to be that the sonar assessment of the escapement was not accurate for over 30 years. It certainly appears that the western part of the State would benefit from Federal oversight, improved conservation and management measures and the requirement of managing to the 10 National Standards. In any case, these stocks are in desperate need of rebuilding, as required by NS 8 with an economic analysis, as required. If salmon stocks in Southcentral Alaska and the Alaska Peninsula are not in need of conservation measures, why is the NPFMC looking at capping the GOA Chinook harvests in the

trawl fisheries? The only SOC in the East Area just happens to be on a stock in an area not covered by the FMP – McDonald Lake sockeye salmon.

In total in UCI, the only area for which we could find data, there are 1,374 anadromous salmon streams. There are 445 Chinook salmon stocks in 46 different streams and rivers; at best two of these rivers are managed for MSY. There are 394 Sockeye salmon stocks in 43 different streams and rivers, at best one of these rivers is managed for MSY and it is a minor stock of less than 100,000 fish total run. There are 1,090 Coho salmon stocks in 99 different streams and rivers, none are managed for MSY. There are 222 Pink salmon stocks in 56 different streams and rivers, there isn't even a single Pink salmon escapement goal and zero active management. The ADF&G estimate of the Pink return in UCI in 2000 was between 20 and 40 million, with an incidental harvest of just 146,000 throughout UCI by all gear groups, certainly much below MSY. There are 167 Chum salmon stocks in 43 different streams and rivers; there is no chum salmon management for MSY.

In 1977, with the first version of the FMP and through 11 different revisions, the traditional net fisheries exemption in the West Area and deferral of management to the State remained constant. In the 1990 revision, the Council put into print the following quote: "the Council has reaffirmed its decision that existing and future salmon fisheries provide a situation demanding the federal participation and oversight contemplated by the Magnuson Act." What changed in the 12th revision to completely delete these areas from the protections afforded not only the salmon stocks transiting the EEZ, but also the protections afforded to the fishing community by inclusion in the FMP? The benefits of Federal oversight and coordination appears to be in the millions of dollars to the commercial industry in the three areas, while the costs, as estimated in this document, are one employee-year or approximately \$100K per year.

In the opening paragraph of this letter, we alluded to a growing bias for the last 10 – 15 years away from MSY based management in favor of SY levels, or no management at all for some stocks to favor sport fishing interests at the expense of the commercial fishing communities in many areas of the State. These changes began to really swing into action beginning in the mid 1990's as the State Sportfish Division leaders shifted management away from MSY management towards a stable and predictable fishery with increasing levels of non-resident fishers and growing harvests. All of this was fine until ADF&G began to shift management away from MSY/BEG management to SEG/SY management. With wider goals set for SY, there is less pressure to manage the fishery and the State Legislature is less likely to complain when they receive the report from ADF&G. Now, we are seeing an increasing number of lower bound Sustainable Escapement Goals, which are even set for a lower standard and are not scientifically defensible or legal under MSA. We believe that NPFMC oversight to enforce MSA standards is imperative in this case and should be implemented State-wide, not just in the Eastern Area. The issues raised in this paragraph are major deficiencies and should have been identified, discussed and subject to criteria and National Standard analysis.

Safety, NS10, is an issue and is not addressed in the current FMP document. The State has said on numerous occasions that the Safety of the stakeholders is not an issue and need not be considered in the management plans.

UCIDA contends that the drift fleet harvest of salmon, all species, in UCI would be in excess of 80 percent in the EEZ. The State has adopted regulations that have lowered this general over average to 50 – 60 percent of the salmon harvested by the drift fleet. On Chum, Pinks and Coho, our harvests are 80 – 100 percent in the EEZ.

Additional incorrect statements or problems in the review document:

1. Page 16. Salmon are managed by the State for SY not MSY as directed by MSA and there is some question whether they belong to the State. The Board is not under any legal requirement to allocate or conserve according to MSA standards.
2. Page 16. Last paragraph. Most stocks are not monitored for escapements by index or other measures.
3. Page 23. Where is the rationale that the last paragraph says is necessary to remove the three net areas? There is no seamless management by the State as these fish go from State to Federal to International waters and back, and the State may have authority to about 3 miles from State waters with the net area EEZ fisheries.
4. Page 27& 28. Section 2.5.1 Seven Criteria for determining if an FMP is necessary. If you use these criteria, the FMP is necessary in all areas.
5. Page 28. Managing fisheries as a unit throughout their range. Under Alt. 2, the discussion is ridiculous and alludes to monsters under the bed which don't exist. The cost of implementing this alternative is the cost of updating the FMP as required and delegating the management in the EEZ net areas to the State with enforcement of an MOU that spells out the MSA criteria that are to be followed throughout their range. There is still an MOU in effect since 1996 that says the State will manage according to MSA standards, it was signed by the commissioner and has not been withdrawn. The Council has never reviewed these fisheries since 1991, and therefore it has never been enforced.
6. Page 28. Under Alt. 3, most of this discussion is again without merit. The Federal Government is required to manage these stocks for MSY in the EEZ and beyond, but the minute the salmon reach State waters in the three net areas in the west, most stocks are managed for SY at best, and the Federal interest is no longer there. Again, this does not demonstrate seamless management throughout their range. In addition, there is a totally unregulated, non-resident net fishery created in the traditional net areas utilizing any gear not expressly closed by Federal regulation. Seines of unlimited length and depth, unregulated drift and set gillnets, even traps could be used. Again, it hardly seems seamless.
7. Page 29. The stocks of concern next to last paragraph. Eight out of 289 sounds pretty good, however, that is only for stocks that have goals. There are thousands of other stocks which may not be as well managed, ask the State about the pike ravaged stocks of Cook Inlet, such as salmon in Red Shirt Lake and what they are doing for that stock.
8. Page 29. Last paragraph on the page. Again, this entire discussion is ridiculous and untrue. The Council has authority from 3 – 200 miles, and the Secretary has authority inside three miles, if necessary. MSA requires MSY and other provisions throughout the salmon's range and the Supremacy Clause of the Federal Constitution says the State will obey Federal law!

9. Page 30. The entire first paragraph is generally incorrect, and managing all fisheries near shore creates an intense fishery that cannot be controlled, and the fish do not get processed in a reasonable fashion.
10. Page 30. The entire second paragraph is generally incorrect. State management did not take place until 1961, and as stated numerous times above, the State management system is not consistent with MSA.
11. Page 30. The entire third paragraph is generally incorrect. While the Council can only promulgate an FMP in the EEZ, the Secretary can make the requirements of management in State waters consistent with MSA through withholding of Federal funds or court action if the State fails to comply.
12. Page 31. The first and second paragraphs are generally incorrect. Both Alternatives 3 and 4 open a loophole to create an unregulated, pirate fishery in the net areas of the EEZ, and in the entire EEZ in the West Area under Alternative 4. Both alternatives are dangerous and unacceptable!
13. Page 31. The entire third paragraph is generally incorrect. Costs of Alternative 2 would be no more than developing the management plan as required by MSA. Management can still be deferred to the State.
14. Page 31. The last paragraph is generally incorrect. Had the Council and NMFS actually reviewed these fisheries, as required over the last 20 – 30 years, this FMP would not be so woefully deficient and the fisheries in the West Area would not be suffering to the degree they are now.
15. Page 32. The entire third paragraph is generally incorrect. There will be a growing, unregulated fishery in the net areas by non-residents. There are a number of boats available and permit prices have rebounded in the last few years, so some fishermen will choose to go without a permit. State enforcement can only enforce illegal activity; you are making this practice legal! Ask Mr. Nelson what law he will be enforcing to seize these boats.
16. Page 32. The premise in the last paragraph is generally incorrect. A big, unregulated fishery will be prosecuted 7 days a week, 24 hours a day! When this occurs, an FMP will be required to address the newly developed fishery you created.
17. Page 33. The first and second paragraphs are generally convoluted and incorrect. The NPFMC wants to avoid doing its' job of writing a reasonable FMP, and in so doing, is willing to create a huge problem of a totally unregulated fishery. To correct that new problem, will we get Congress to change MSA? Maybe it will be easier to start to write a reasonable FMP. We will settle for reasonable and will help draft it, if you so desire.
18. Page 34. We agree with the premise that no one wants Federal management, just Federal oversight.
19. Page 33. The last paragraph is incorrect. BEGs are set for MSY, and there are generally few of them. SEG's are set for SY, and most goals are of this type, see page 123 – 133. Lower Bound SEG's are thought to be SY, but there is no way of knowing for sure. Management for these goals is another issue. Nearly half of all goals are not achieved for varying reasons; at times the regulations prevent ADF&G management from achieving the goals, other times they just miss them.
20. Page 38. The second paragraph is totally incorrect. The State's mandate is SY, not MSY as required by NS1, perhaps more review is necessary.
21. Page 41. The second paragraph. How do you reconcile the need to develop annual catch limits in the States' escapement goal system, with the earlier statement about not being

- able to control what the State does with harvests or escapements once the fish reach State waters? It would appear that your marching orders have changed to include regulating the State's actions in State waters with respect to MSY and MSA requirements.
22. Page 41. The third paragraph. How do you reconcile the need to develop annual catch limits and a scientifically based harvest control system with earlier statements of not being able to control what the State does with harvests or escapements once the fish reach State waters? Again, it would appear that your marching orders have changed to include regulating the State's actions in State waters with respect to MSY and MSA requirements.
 23. Page 41. The fourth paragraph. Again, the State manages very few stocks for MSY! What OY are you referencing, the State's or MSA, they are different.
 24. Page 42. The last paragraph. Again, the State manages very few stocks for MSY, so there is no compliance with NS1.
 25. Page 43. The second paragraph. Salmon escapement goals should be managed as a range and not just to see that minimum goals are achieved. The lost yield by going over the goal is likely to be just as injurious to MSY production as going under the goal by the same amount.
 26. Page 44. The second paragraph. We would agree that escapement goal management is the most scientifically valid, if the State managed for MSY throughout the State and did not allow the Board to create regulations that prevent management to the goals. Goals need to be set and achieved in order to be successful.
 27. Page 44. The third paragraph. Goals are set on very few stocks, certainly not the majority.
 28. Page 45. The second paragraph is a total fabrication. See pages 123 – 133, which delineate the type of goal. And again, the State manages very few stocks for MSY, so there is no compliance with NS1.
 29. Page 46. The fourth paragraph is what is in regulation; however, in practice, repeatedly going over the goal does not trigger a SOC designation.
 30. Page 46. The fifth paragraph. We agree they do manage for below MSY levels.
 31. Page 46. The last paragraph. The best scientific data available is sometimes not very useful. Many stocks are managed with single aerial surveys, which are akin to junk science where you really have no idea what the true escapement is, and at other times the State continues to use flawed sonar programs that are known to be totally inaccurate. Use of the best science would be more appropriate.
 32. Page 47. The first paragraph ensures sustained yield over the long term, again, not MSY as required in NS1.
 33. Page 49. The first line. Consumption by marine predators is not accounted for in escapement goals and the rest of the paragraph is flawed in logic.
 34. Page 49. The last paragraph is not a good idea. Having the State peer review their own information is likely to result in nothing but good reviews, not necessarily independent or useful.
 35. Page 51. The last paragraph. The board can and has set escapement goals different from MSY and has not done an analysis of lost yield, even when it was requested, at least in the cases with which we are familiar. Still violates NS1.
 36. Page 56. The first paragraph. From where it begins: "prevent overfishing and achieve optimum yield", we agree you do not know what you are doing. That portion of the EEZ has been closed for years and the State still misses goals about 50 percent of the time.

37. Page 144. The first paragraph. There is a huge risk that piracy will occur at a high level with large catches.

In closing, we would like to once again register our complete dissatisfaction with your choice of preferred Alternative 3, which places a large part of the State's salmon fisheries in jeopardy. In addition, we do not think any of the alternatives other than Alternative 2 are legal or advisable.

Thank you for your time and consideration of our comments.

Sincerely,

Roland Maw, PhD
UCIDA Executive Director

ams



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October 3, 2011

Roland Maw, Executive Director
United Cook Inlet Drift Association
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Dear Dr. Maw,

I would like to thank you for the opportunity to participate in the United Cook Inlet Drift Association's (UCIDA) June 25, 2011, annual membership meeting. It was apparent at this meeting that there are a number of issues facing commercial fishing businesses in Cook Inlet and Alaska. It was also apparent that there may be some confusion about the Cook Inlet Aquaculture Association (CIAA) and its role in Cook Inlet's common property salmon fishery. The following is a brief description of CIAA and its programs that may help to lessen some of that confusion.

First, CIAA is a private nonprofit corporation organized under the laws of the State of Alaska for the purpose of engaging in salmon enhancement activities throughout the Cook Inlet Region. The Cook Inlet Region includes waters of Alaska in Cook Inlet and Resurrection Bay north of Cape Douglas and west of Cape Fairfield including the Barren Islands and all the region's freshwater drainages. The watershed of this area includes rivers and lakes within the Matanuska-Susitna and Kenai Peninsula Boroughs and the Municipality of Anchorage. Combined, these areas are home to over half the population of the State of Alaska.

CIAA's mission is to 1) protect the self-perpetuating salmon stocks within this area and the habitats upon which they depend, 2) rehabilitate salmon stocks within this area and the habitats upon which they depend, and 3) maximize the value of the Cook Inlet common property resource by applying sound science and enhancement technology where appropriate. Projects undertaken by CIAA involve salmon population enhancement, habitat restoration, habitat enhancement or salmon population monitoring and evaluation. In general, our projects are designed to sustain current common property harvest opportunities during years when natural returns are low or provide additional common property harvest opportunities where such opportunities exist.

CIAA was organized and incorporated in 1976, and in 1977, it was found to be a "Qualified Regional Aquaculture Association" by the Commissioner of the Alaska Department of Fish and Game. When CIAA was initially formed, Cook Inlet commercial salmon fishermen voted for a 2% mandatory assessment to fund CIAA. The legality of the "mandatory assessment" financing

system was challenged in 1978, and in 1979, a 2% Salmon Enhancement Tax (SET) replaced the 2% mandatory assessment. CIAA received its first SET funds in 1981.

The SET has provided CIAA with an important source of funds for conducting the various salmon enhancement projects throughout the Cook Inlet area. Over the last 31 years, CIAA has received \$23,141,009 in SET funds. CIAA received most of the SET funds (82%) prior to Fiscal Year 2000 when the SET provided a substantial portion of CIAA's annual operating budget. Prior to Fiscal Year 2000, the SET funds received by CIAA averaged \$1,050,500 per year. The size and stability of the SET prior to Fiscal Year 2000 allowed CIAA flexibility in directing salmon protection, rehabilitation and enhancement activities within the Cook Inlet drainage and several projects were directed at Upper Cook Inlet salmon populations. Since 2000, the SET funds received by CIAA have averaged only \$352,600. Other, more restrictive, sources of funds have become important in CIAA's financial structure.

As the availability of SET funds has declined, cost recovery harvests have become an important source of income for the Association. CIAA, through Special Harvest Permits, has the right to harvest a portion of the salmon returning to CIAA salmon population enhancement projects to offset the Association's operating costs.

CIAA has six designated Special Harvest Areas for completing cost recovery harvests and all six Special Harvest Areas are in Lower Cook Inlet. Each year, CIAA develops a budget projecting operating costs and funding needs. Funding needs from the Special Harvest Areas are then identified in each hatchery's Annual Management Plan which is reviewed and approved by the Alaska Department of Fish and Game. Through a bid process, a processor is then selected to conduct the harvest.

The SET and cost recovery harvests can be quite variable. Because of this variability, CIAA has had to secure some of the financial resources needed to operate its salmon enhancement programs from loans. All CIAA loans have been obtained from the State's Fisheries Enhancement Revolving Loan Fund and have generally been used for special projects or to cover normal operating costs during unusual financial circumstances. CIAA's debt, as of September 2010, is \$3,328,249. This debt is secured by the Association's assets, including future fish returns and the SET.

CIAA has never missed a loan payment nor defaulted on any loan. I am aware, however, that some Cook Inlet salmon permit holders are concerned that they may be liable, through the SET, for CIAA's debt. While it is true permit holders would be responsible for SET payments until all loans are repaid, it is unlikely this responsibility would represent a substantial burden to any permit holder or permit holders collectively. If CIAA defaulted on its loans, other assets, such as CIAA's property and equipment and fish currently at-sea, are available to repay CIAA's debt. CIAA's property and equipment, as of September 2010, is valued at \$2,064,584 and the ex-vessel value of fish returning to Resurrection Bay in 2011, which is one of six CIAA Special Harvest Areas, was more than \$2,000,000. Two years of similar returns are currently at-sea, which would cover all of CIAA's current debt. If CIAA defaulted on its loans, these assets, as well as the SET, would be available to repay CIAA's debt.

I would also like to note that approximately 46% of CIAA's current debt was used to support salmon rehabilitation and enhancement projects in Upper Cook Inlet. This debt is being repaid through cost recovery harvests which are all conducted outside of Upper Cook Inlet.

In addition to the aforementioned financial resources, grants have become an important source of funds for the Association, particularly in Upper Cook Inlet where traditional salmon population enhancement activities through hatchery supplemental production is limited. Grant funds have been used to support a variety of projects, but have been used primarily for salmon monitoring activities. Since 2002, CIAA has conducted various salmon monitoring projects throughout Upper Cook Inlet totaling more than \$3.6 million. Grants supporting this monitoring activity have come from both Federal and State agencies and some have required as much as a 33% match by CIAA.

One of the projects supported by grant funds providing benefits to Upper Cook Inlet salmon fisheries has been the Susitna River drainage salmon population monitoring. CIAA has been conducting this effort for over 5 years and has made some interesting observations.

- The initial adult escapement monitoring completed in 2006 indicated the Yentna River sonar counter was underestimating sockeye salmon escapements to the Susitna River drainage system.
- Initial adult escapement monitoring identified 2 lakes, Trapper and Red Shirt Lakes, which historically produced sockeye salmon with no returns. Later monitoring identified 3 additional sockeye salmon lakes, Neal, Sucker and Caswell, with no returns.
- Sockeye salmon smolt monitoring in conjunction with adult escapement monitoring has revealed one Lake, Shell Lake, where smolt production does not appear to be consistent with the adult spawning population. In 2009, 4,961 adult sockeye salmon returned to Shell Lake and presumably spawned. In 2011, when progeny from the 2009 spawning escapement were expected to migrate from Shell Lake, only 35 sockeye smolt were enumerated. While any final conclusion is premature at this time, the Shell Lake sockeye salmon population is low; and, if the population trends continue, may be disappearing.
- The 2012 smolt migration and adult return estimates are published on CIAA's website at www.ciaa.net.org.
- The cause of the loss of sockeye salmon populations from the aforementioned lakes has not been identified, but the lakes are in an area where beaver dams are known to be obstacles to salmon migration and where northern pike populations, an introduced predator species, have been established. Through a combination of dispersal and illegal introductions, invasive pike are now found in over 130 water bodies in the Mat-Su Valley, Anchorage, and the Kenai Peninsula.

The next stage of the Susitna River drainage salmon project is the design and development of projects for salmon population rehabilitation. These projects are likely to be long-term and expensive to implement.

In addition to the Susitna River project, CIAA has monitored other salmon populations in Upper Cook Inlet at Packers Lake, Hidden Lake, Big Lake, Cannery Creek and Tustumena Lake. The purpose of this monitoring has generally been to provide information on the status of the salmon populations from these nursery areas so that fishery managers have the data they need to make good decisions.

CIAA recognizes that monitoring itself does not provide additional harvest opportunities to Upper Cook Inlet fishermen. However, we feel this monitoring is important as it protects the long-term health of the resource and may indirectly provide additional harvest opportunities through proper and precise management.

CIAA is currently enhancing the sockeye salmon population at Hidden Lake through supplemental hatchery production. Based on return counts and harvest records, we estimate 25,000 to 75,000 additional fish are produced in Upper Cook Inlet for harvest each year.

Historically, CIAA did provide additional fish for harvest in Upper Cook Inlet through other hatchery supplemental stocking projects. Supplemental production of sockeye salmon in Tustumena Lake and Packers Lake both provided from 50,000 to 150,000 additional fish in the harvest each year. Supplemental production at Big Lake provided fewer fish in the annual harvests, however, returning fish were available to a greater number of harvesters. CIAA lost access to Tustumena Lake for fishery enhancement through a court decision in 2003 and decided to discontinue supplemental production at Packers Lake in the late-1990s and at Big Lake in the mid-2000s. The Packers Lake decision was based on several factors including cost and a shortened commercial harvest season. The Big Lake decision was based on cost and poor freshwater survival rates.

CIAA has been active in providing additional sockeye production for harvest in Upper Cook Inlet in other ways as well. This additional production has been accomplished through the removal or control of barriers to adult fish as they migrate through freshwater to their spawning grounds. CIAA has installed and annually maintains and operates flow control structures at Martin Lake, Packers Lake and Daniels Lake. Salmon migrating to these lakes to spawn have historically struggled to reach their spawning grounds and salmon production from these rearing systems has suffered. By annually releasing water from these lakes during critical low-flow conditions, CIAA assures adult salmon have successfully spawned in these lakes each year thus stabilizing annual returns and harvest opportunities. In a similar project, CIAA modified a flow control structure at Big Lake to assure immature fish from adults spawning below Big Lake could migrate into Big Lake each year for rearing.

Each year, CIAA also conducts aerial surveys of several salmon rearing lakes. The purpose of these surveys is to identify systems where adult sockeye are being prevented from reaching their spawning grounds by beaver dams. Beaver dams blocking fish migration are "notched" allowing fish to continue their upstream migration. "Notching" is temporary as the beavers quickly repair the dams. It is also not required every year as wet years and timely rainfall events can allow passage around beaver dams.

The value of maintaining and operating flow control structures and annually surveying salmon systems for beaver dams is very hard to assess. In wet years these activities provide few

additional fish; however, in dry years they could result in substantial salmon production. We believe this production can be a significant factor in stabilizing harvest opportunities for all user groups.

CIAA is concerned about the salmon populations of Upper Cook Inlet and is working to stabilize and provide additional harvest opportunities in Upper Cook Inlet. Unfortunately, due to genetic and mixed-stock fishery concerns there are few opportunities to increase salmon production through hatchery programs and it is very difficult to quantify the contribution our programs are making to the Upper Cook Inlet harvest.

Respectfully



Gary Fandrei, Executive Director
Cook Inlet Aquaculture Association

**MARK-RECAPTURE POPULATION ESTIMATES OF COHO, PINK, AND CHUM
SALMON RUNS TO UPPER COOK INLET IN 2002**



By
T. Mark Willette
Robert DeCino
ancy Gove

Regional Information Report No. 2A03-20

**Alaska Department of Fish and Game
Commercial Fisheries Division
333 Raspberry Rd.
Anchorage, Alaska 99518-1599**

June 2003

¹The Regional Information Report Series was established in 1987 to provide an information access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterpreted data. To accommodate timely reporting of recently collected information, reports in this series undergo only limited internal review and may contain preliminary data; this information may be subsequently finalized and published in the formal literature. Consequently, these reports should not be cited without prior approval of the author or of the Commercial Fisheries Division.

ABSTRACT

This project estimated the total population sizes, escapements, and exploitation rates for coho, pink, and chum salmon returning to Upper Cook Inlet (UCI) in 2002 as a first step toward determining escapement levels needed to achieve sustained yields for these species. Mark-recapture techniques were used to estimate the total population sizes for each species returning to UCI as a whole. Salmon were tagged along a transect running from Anchor Point to the Red River delta on the west side of Cook Inlet during July and early August. Total population sizes for each species were estimated from recoveries of passive integrated transponder (PIT) tags in commercial fishery harvests. Recoveries of radio telemetry tags were used to estimate the total escapement of coho salmon into all UCI streams for comparison to the estimate derived from PIT tags. Radio telemetry tag data were also used to estimate coho salmon escapements into 33 streams and 5 areas around UCI. Our best PIT tag estimate of the total population size of coho salmon returning to UCI was 2.52 million (95% CI: 2.16-2.87 million). Given a commercial harvest of 0.25 million, the total escapement of coho salmon into all UCI streams was 2.27 million (95% CI: 1.91-2.62 million), and the exploitation rate in the commercial fishery was about 10%. Our radio tag estimate of the total escapement of coho salmon into all UCI streams was 1.36 million (95% CI: 0.98-1.96 million). Thus, our PIT tagging experiment estimated a population size for coho salmon entering UCI streams that was higher than the estimate obtained from radio tagging. Although, the 95% confidence intervals around the two estimates overlapped slightly, the z-test statistic indicated the two estimates were significantly different. Of the total coho salmon escapement into all UCI streams, 56% (0.76 million) returned to the Susitna and Little Susitna River drainages, 19% (0.26 million) returned to streams along the west side of UCI, 17% (0.24 million) returned to streams along Knik Arm, 5% (0.07 million) returned to streams along Turnagain Arm, and 3% (0.04 million) returned to streams on the Kenai Peninsula. However, these estimates for Turnagain Arm and Kenai Peninsula streams do not include the entire escapement, because we stopped tagging before the runs to these areas were complete. Our PIT tag estimate of the total population size of pink salmon returning to UCI was 21.28 million (95% CI: 1.60-40.96 million). However, this estimate was of questionable value due to its very low precision resulting from problems with tag recovery. Therefore, we estimated a maximum exploitation rate on pink salmon in the commercial fishery by simply summing escapements that were actually enumerated in 3 streams. Given a commercial harvest of 0.45 million, the maximum exploitation rate in the commercial fishery was about 12%. However, the actual exploitation rate must have been much lower, because we did not include escapements into numerous other streams around UCI. Our PIT tag estimate of the total population size of chum salmon returning to UCI was 3.88 million (95% CI: 3.30-4.47 million). Given a commercial harvest of 0.24 million, the total escapement of chum salmon into all UCI streams was 3.64 million (95% CI: 3.06-4.23 million), and the exploitation rate in the commercial fishery was about 6%. Despite uncertainty in our salmon population estimates, it is reasonable to conclude that exploitation rates on coho, pink, and chum salmon in the UCI commercial fishery were substantially below optimal rates in 2002.

KEY WORDS: Coho salmon, *Oncorhynchus kisutch*, pink salmon, *O. gorbuscha*, chum salmon, *O. keta*, mark-recapture, passive integrated transponder tags, radio telemetry tags, total population size, escapement, exploitation rate.



Kenai River Late Run Sockeye (LRS) Salmon Escapement Goals Analysis and Recommendations

Late Run Sockeye – Kenai River – UCIDA Recommendation

- BEG at 650,000 to 950,000 (DIDSON)
 - OEG at 600,000 to 1,000,000 (DIDSON)
 - In River goals not to exceed 1,000,000 (DIDSON)
1. The reference document is: Review of Salmon Escapement Goals in Upper Cook Inlet, Alaska, 2011. Fishery Manuscript Series No. 10-06.
 2. On page 1 – 9 the Department **does not** inform the readers that there have been **250,000 sockeye deductions** from the Kenai returns and a corresponding **250,000 sockeye additions** to the Kasilof returns. See also page 11: Sockeye Salmon, Kasilof River, there is no mention of the additional 250,000 sockeyes.
 3. Page 12, paragraph 2. The contrast for the Kenai LRS is $12.7 \div 1.4 = 9.07$. The Kenai LRS have an SEG with a high contrast of 9.07. If there is an escapement contrast and exploitation with a high contrast, greater than 8, the SEG range should be the 25th to 75th percentile. If the Kenai LRS are to be managed under an SEG scenario, then the 25th to 75th percentile should be used. The Department can't have it both ways, i.e., an SEG with high contrast and not follow the percentile approach. The reader is never told that the contrast is 9.07. The reader is never told why the Kenai is an SEG and why the 25th to 75th percentile approach was not followed. If the Kenai LRS are to be managed under a BEG, then the 25th to 75th parallel should not be used.
 4. Page 12, paragraph 4. "Likelihood profiles of escapements that produced high sustained yields further showed the simple brood interaction model as the best described stock-recruitment relationship for this stock (Figure 11)." On Page 13, paragraph 1: "from analysis of the 1969-2005 data suggest a goal range of 650,000 – 950,000 (Table 8, page 29)" Fair, et al., 2010
 5. Page 12, paragraph 5. In this one paragraph there are four escapement goals given, see Fig. 1 below. The best model produced an escapement goal range of 650,000 – 950,000. Why was this abandoned in favor of a much higher escapement goal range?
 6. Page 13, paragraph 2. The next best model was the "Markov Yield Analysis." "a Markov yield analysis indicated highest (>3.9, million) mean yields occur within a range of 600,000 – 900,000 spawners (Table 9), and that escapements from 500,000 – 1,200,000 also produce high (>2.3 million) yields. Escapements below 400,000 salmon never produced yields exceeding 948,000. The highest yields (Figure 12) originated from



escapements of 755,000, 792,000, and 1,983,000 sockeye salmon (brood years 1982, 1983, and 1987). When escapements exceeded 900,000, yields were highly variable, ranging from 513,000 - 8,396,000. In this updated data set, 4 year classes (2002 - 2005) were added to the upper escapement interval (Appendix C6). Yield from the 2002 year class (2,543,500) was above average (2,459,400), whereas yields from 2003 to 2005 year classes (513,500, 1,551,300, and 1,003,300) were below average. This pattern of reduced yield from consecutive large escapements is consistent with the brood interaction observed in brood years 1987-1990." See Table 9, page 30, Escapement Goal Report, Fair, et al. 2010. See Fig. 1 below.

Figure 1

<u>Model/Method</u>		<u>LRS Escapement Ranges</u>
Brood Interaction	1969 - 2005	650,000 - 950,000
Brood Interaction	1979 - 2005	500,000 - 1,000,000
90 - 100% MSY	1969 - 2005	700,000 - 1,200,000
90 - 100% MSY	1979 - 2005	650,000 - 1,100,000
Markov Yield	1969 - 2005	600,000 - 900,000

7. Page 13, paragraph 3. "We recommend that the Kenai River late-run sockeye salmon SEG be set at 700,000 - 1,200,000 spawners as estimated using the brood-interaction model fit to the full data set." This is the highest numeric values for both the lower and upper ranges of the five (5) escapement goal ranges discussed in Fig. 1 above. This escapement goal range utilizes an **MSY value of 950,000**, 1969-2005 data set that came from the brood interaction model. The Department now rejects the 650,000 - 950,000 range, but utilizes the 950,000 MSY value form the brood interaction model to establish an SEG with 90 - 100% percentile ranges, 700,000 - 1,200,000. In this case, we know MSY is 950,000. A BEG is the appropriate type of escapement goal designation, NOT an SEG.
8. Page 29, Table 8. As you look at Table 8, the 5th and 9th columns display P<1000 values. These are the probabilities of having a return of less than (<) 1,000,000 sockeyes 6% of the time. The Department fails to visually graph these risk data values. Additionally, the Department fails to provide the probability risk values for returns of <1.5, 2.0, 2.5, 3.5, 3.5 and 4.0 million. These probability and risk values are important and need to be presented and discussed.
9. Pages 12, 13, 29 and 30 describe two data sets, 1969-2005 vs. 1979-2005. On these pages there are numerous references and escapement goals presented utilizing these data sets. There is an inadequate discussion as to the differences between them.



10. Precautionary Approach – In reviewing the Departments documents, we have noticed that there are many mathematical and statistical errors, unexplained leaps in logic, unsupported conclusions and recommendations.

Set of measures taken to implement the Precautionary Principle. A set of agreed effective measures and actions, including future courses of action, which ensures prudent foresight, reduces or avoids risk to the resource, the environment, and the people, to the extent possible, taking explicitly into account existing uncertainties and the potential consequences of “being wrong.”

11. Recommendation(s) – UCIDA

1969-2005 data time-series:

- Kenai LRS Escapement Goal
 - BEG – **650,000 – 950,000**
 - OEG – **500,000 – 1,000,000** exists currently
 - In-River Goal **never to exceed 1,000,000 + 150,000** sport harvest allocation above the sonar site at River Mile 19.5

1979-2005 data time-series:

- Kenai LRS Escapement Goal
 - BEG – **500,000 – 1,000,000**
 - OEG – **500,000 – 1,000,000** exists currently
 - In River – **500,000 – 1,000,000 + 150,000** sport harvest allocation above the sonar site at River Mile 19.5

What concerns UCIDA is a scenario where the Kenai River LRS return of less than 2,000,000 and the following occurs:

Escapement	1,200,000
PU Harvest	300,000
In-River Harvest	<u>300,000</u>
	1,800,000

This scenario would provide for a commercial harvest of 200,000 among the 1,200-plus families. Escapement goals and allocations as small returns, <2 million, are a big deal and important. That is why we need a public debate about escapement goals and allocations.



possible, taking explicitly into account existing uncertainties and the potential consequences of “being wrong.”

UCIDA Recommendations – 1969-2005 data set

Kenai River LRS:

BEG Goal – 650,000 – 950,000

OEG – 500,000 – 1,000,000 exists currently

In-River never to exceed 1,000,000 + 150,000 harvest above the sonar

UCIDA Recommendations – 1979-2005 data set

Kenai River LRS:

BEG Goal – 500,000 – 1,000,000

OEG – 500,000 – 1,000,000 exists currently

In-River never to exceed 1,000,000 + 150,000 harvest above the sonar

Kenai River

ADF&G adopted the current escapement goal range of 500,000–800,000 in 1999. In 2005 the goal changed from a BEG to an SEG (Clark et al. 2007). The goal does not include hatchery-produced sockeye salmon passing through the Hidden Creek weir. Results from this review use DIDSON as the estimate of inriver abundance.

Over the past 43 years, Kenai River sockeye salmon escapements ranged from about 73,000 to about 2.0 million (Figure 7, Appendix C6). During this same time span, recruit/spawner estimates ranged from approximately 1.4 to 12.7 (Figure 7). The second highest estimated escapement level occurred in 1987 and produced recruits at the rate of about 5 to 1, while a similar escapement in 1989 produced recruits at a rate of about 2 to 1. The highest estimate of recruits/spawner (12.7) came from the 1982 escapement (755,413).

Using the full data set, 1969–2005, the general Ricker model was significant ($P < 0.001$) for the Kenai sockeye salmon spawner-return data. However, the density-dependent parameter (β) did not significantly differ from zero ($P = 0.157$), and γ was not different from one ($P = 0.897$; Table 6). For the classic Ricker model (Figure 8), β was significantly different from zero ($P = 0.004$), but a lag-1 autoregressive (ϕ) parameter was not significant ($P = 0.079$; Table 6). The density-dependent parameter (γ) in the Cushing model significantly differed from one ($P = 0.014$). Finally, the density-dependent parameters in the classic Ricker model with a single brood-interaction term (Carlson et al. 1999) did not significantly differ from zero ($P \geq 0.100$). A stepwise regression procedure revealed a brood-interaction model describing the stock-recruitment relationship. The β parameter was significantly different from zero ($P = 0.006$) in a 3-parameter model, but γ was not significantly different from one ($P = 0.824$). A simplified 2-parameter brood-interaction model best described ($P < 0.001$) the stock-recruitment relationship for this stock (Table 6, Figure 9). The improved fit of the simple brood-interaction model over the classic Ricker was primarily due to brood years 1988–1990, which followed the largest escapements ever observed in 1987 and 1989 (Figure 10). The improved fit of the simple brood-interaction model was also due to brood years 2004 and 2005, produced by the 3rd and 5th largest escapements.

Using the 1979–2005 data, the Ricker and Cushing models did not fit the spawner-return data for Kenai River sockeye salmon (Table 7). For the classic Ricker model, β was significantly different from zero ($P = 0.016$), but the R^2 for a regression of observed versus predicted adult returns was only 0.06. For the autoregressive Ricker model, β did not significantly differ from zero ($P = 0.839$), but the lag-1 autoregressive parameter was significantly different from zero ($P = 0.003$). For the autoregressive Ricker model, the R^2 for a regression of observed versus predicted adult returns increased to 0.23, and the likelihood ratio test demonstrated a significant ($P < 0.05$) improvement in model fit over the classic Ricker model. For the classic Ricker model with a single brood-interaction term, the first density-dependent parameter (β_1) did not significantly differ from zero ($P = 0.088$), but β_2 was different from zero ($P = 0.021$). As before, a stepwise regression procedure revealed a simplified 2-parameter brood-interaction model that best fit the spawner-return data (Table 7). Likelihood profiles of escapements that produced high sustained yields further showed the simple brood interaction model as the best described stock-recruitment relationship for this stock (Figure 11).

Applying the same criteria (<6% risk of a yield <1 million sockeye salmon) used to establish the current SEG (Carlson et al. 1999), simulations of the brood-interaction model using parameters

from analysis of the 1969–2005 data suggest a goal range of 650,000–950,000 (Table 8). Simulations using parameters from analysis of the 1979–2005 data suggest a goal range of 500,000–1,000,000. Using escapements that represent 90–100% MSY (1969–2005: MSY = 3,103,000; 1979–2005: MSY = 3,378,000), the ranges were 700,000–1,200,000 and 650,000–1,100,000 spawners for the full and reduced data sets (Table 8).

A simple 2-parameter brood-interaction model (Carlson et al. 1999) best fit the Kenai River sockeye salmon spawner-return data based on R^2 and AIC values (Tables 6 and 7). Edmundson et al. (2003) hypothesized that brood interactions likely result from food limitation and subsequent mortality of fry immediately following emergence and during the first winter. Large fry populations from the previous brood year cause reduced copepod (zooplankton) density the following spring, limiting food resources for subsequent fry. The effect that fry grazing on copepod biomass has the following spring is caused by the 2-year lifecycle of the dominant copepod species in this system.

Using the full data set (1969–2005), a Markov yield analysis indicated highest (>3.9 million) mean yields occur within a range of 600,000–900,000 spawners (Table 9), and that escapements from 500,000–1,200,000 also produce high (>2.3 million) yields. Escapements below 400,000 salmon never produced yields exceeding 948,000. The highest yields (Figure 12) originated from escapements of 755,000, 792,000, and 1,983,000 sockeye salmon (brood years 1982, 1983, and 1987). When escapements exceeded 900,000, yields were highly variable, ranging from 513,000–8,396,000. In this updated data set, 4 year classes (2002–2005) were added to the upper escapement interval (Appendix C6). Yield from the 2002 year class (2,543,500) was above average (2,459,400), whereas yields from 2003 to 2005 year classes (513,500, 1,551,300, and 1,003,300) were below average. This pattern of reduced yield from consecutive large escapements is consistent with the brood interaction observed in brood years 1987–1990.

We recommend that the Kenai River late-run sockeye salmon SEG be set at 700,000–1,200,000 spawners as estimated using the brood-interaction model fit to the full data set. The related inriver goal will be assessed with DIDSON. The range approximately represents the escapement that on average will produce 90–100% of MSY. We also recommend using the 90–100% range to set the SEG because it results in a broader interval with the highest predicted yield near its center. Basing a goal range from a model's prediction of escapements that produce 90–100% MSY is common practice throughout Alaska. Finally, this goal is supported by a plot of yield versus escapement, showing that escapements in this range generally produce the highest yields (Figure 12).

Russian River Early Run

The Russian River sockeye salmon early run has an SEG of 14,000–37,000, developed in the 2001/2002 review using the 25th and 75th percentile of the 1965–2000 weir escapement data. We currently have escapement, total return, and exploitation data for 40 years (1970–2009; Appendix C9).

During the 2007 escapement goal review, inclusion of escapement data for the past 6 years into the original SEG percentile analysis resulted in a slight increase in both the lower and upper values of the SEG range due to large escapements between 2001–2006 that were in excess of the upper goal range. During this same review, a Ricker model was fit to the brood year data (1970–1999); however, the β parameter was not significant, probably because the large escapements from 2001 to 2006 were not included since their brood years were still incomplete. Therefore,



Table 1. Lost Yields at various escapement levels 1969-2005

Escapement	Mean Run	Mean Yield	MSY Yield	Lost Yield	P < 1000	
100	641	541	3,103	-2,562	0.934	0.066
150	947	797	3,103	-2,306	0.768	0.232
200	1,247	1,047	3,103	-2,056	0.544	0.456
250	1,539	1,289	3,103	-1,814	0.380	0.62
300	1,822	1,522	3,103	-1,581	0.265	0.735
350	2,094	1,744	3,103	-1,359	0.189	0.811
400	2,352	1,952	3,103	-1,151	0.140	0.86
450	2,597	2,147	3,103	-956	0.105	0.895
500	2,826	2,326	3,103	-777	0.083	0.917
550	3,038	2,488	3,103	-615	0.071	0.929
600	3,232	2,632	3,103	-471	0.064	0.936
650	3,408	2,758	3,103	-345	0.059	0.941
700	3,565	2,865	3,103	-238	0.053	0.947
750	3,702	2,952	3,103	-151	0.050	0.95
800	3,820	3,020	3,103	-83	0.050	0.95
850	3,917	3,067	3,103	-36	0.050	0.95
900	3,995	3,095	3,103	-8	0.053	0.947
950	4,053	3,103	3,103	0	0.058	0.942
1,000	4,092	3,092	3,103	-11	0.062	0.938
1,050	4,112	3,062	3,103	-41	0.066	0.934
1,100	4,114	3,014	3,103	-89	0.071	0.929
1,150	4,100	2,950	3,103	-153	0.080	0.92
1,200	4,069	2,869	3,103	-234	0.089	0.911
1,250	4,023	2,774	3,103	-329	0.104	0.896
1,300	3,963	2,665	3,103	-438	0.123	0.877
1,350	3,891	2,543	3,103	-560	0.143	0.857
1,400	3,807	2,410	3,103	-693	0.172	0.828
1,450	3,713	2,267	3,103	-836	0.203	0.797
1,500	3,612	2,117	3,103	-986	0.238	0.762



Table 2. Lost Yields at various escapement levels 1979-2005

Escapement	Mean Run	Mean Yield	MSY Yield	Lost Yield	P < 1000	
100	746	646	3,378	-2,732	0.886	0.114
150	1,101	951	3,378	-2,427	0.632	0.368
200	1,448	1,248	3,378	-2,130	0.416	0.584
250	1,783	1,533	3,378	-1,845	0.265	0.735
300	2,105	1,805	3,378	-1,573	0.174	0.826
350	2,410	2,060	3,378	-1,318	0.122	0.878
400	2,697	2,297	3,378	-1,081	0.086	0.914
450	2,964	2,514	3,378	-864	0.068	0.932
500	3,209	2,709	3,378	-669	0.056	0.944
550	3,431	2,881	3,378	-497	0.050	0.95
600	3,628	3,028	3,378	-350	0.043	0.957
650	3,800	3,150	3,378	-228	0.040	0.96
700	3,946	3,246	3,378	-132	0.039	0.961
750	4,066	3,316	3,378	-62	0.039	0.961
800	4,160	3,360	3,378	-18	0.039	0.961
850	4,228	3,378	3,378	0	0.041	0.959
900	4,272	3,372	3,378	-6	0.044	0.956
950	4,291	3,341	3,378	-37	0.050	0.95
1,000	4,287	3,287	3,378	-91	0.056	0.944
1,050	4,261	3,211	3,378	-167	0.064	0.936
1,100	4,214	3,115	3,378	-263	0.071	0.929
1,150	4,149	2,999	3,378	-379	0.083	0.917
1,200	4,067	2,868	3,378	-510	0.100	0.9
1,250	3,969	2,721	3,378	-657	0.124	0.876
1,300	3,858	2,560	3,378	-818	0.150	0.85
1,350	3,736	2,389	3,378	-989	0.180	0.82
1,400	3,606	2,210	3,378	-1,168	0.225	0.775
1,450	3,470	2,027	3,378	-1,351	0.261	0.739
1,500	3,334	1,845	3,378	-1,533	0.318	0.682

Table 8, page 29 – Fair, et al., 2010

Table 8.—Simulation results from a brood-interaction model for Kenai River late-run sockeye salmon (numbers of fish in thousands).

Escapement	1969–2005				1979–2005			
	Mean Run	Mean Yield	Yield CV (%)	P<1000	Mean Run	Mean Yield	Yield CV (%)	P<1000
100	641	541	0.64	0.934	746	646	0.63	0.886
150	947	797	0.56	0.768	1,101	951	0.56	0.632
200	1,247	1,047	0.53	0.544	1,448	1,248	0.53	0.416
250	1,539	1,289	0.52	0.380	1,783	1,533	0.53	0.265
300	1,822	1,522	0.51	0.265	2,105	1,805	0.52	0.174
350	2,094	1,744	0.51	0.189	2,410	2,060	0.52	0.122
400	2,352	1,952	0.51	0.140	2,697	2,297	0.52	0.086
450	2,597	2,147	0.51	0.105	2,964	2,514	0.52	0.068
500	2,826	2,326	0.52	0.083	3,209	2,709	0.53	0.056
550	3,038	2,488	0.52	0.071	3,431	2,881	0.53	0.050
600	3,232	2,632	0.52	0.064	3,628	3,028	0.53	0.043
650	3,408	2,758	0.53	0.059	3,800	3,150	0.54	0.040
700	3,565	2,865	0.53	0.053	3,946	3,246	0.54	0.039
750	3,702	2,952	0.53	0.050	4,066	3,316	0.54	0.039
800	3,820	3,020	0.54	0.050	4,160	3,360	0.55	0.039
850	3,917	3,067	0.54	0.050	4,228	3,378	0.56	0.041
900	3,995	3,095	0.55	0.053	4,272	3,372	0.56	0.044
950	4,053	3,103	0.56	0.058	4,291	3,341	0.57	0.050
1,000	4,092	3,092	0.56	0.062	4,287	3,287	0.58	0.056
1,050	4,112	3,062	0.57	0.066	4,261	3,211	0.59	0.064
1,100	4,114	3,014	0.58	0.071	4,214	3,115	0.60	0.071
1,150	4,100	2,950	0.59	0.080	4,149	2,999	0.61	0.083
1,200	4,069	2,869	0.60	0.089	4,067	2,868	0.63	0.100
1,250	4,023	2,774	0.62	0.104	3,969	2,721	0.65	0.124
1,300	3,963	2,665	0.63	0.123	3,858	2,560	0.67	0.150
1,350	3,891	2,543	0.65	0.143	3,736	2,389	0.69	0.180
1,400	3,807	2,410	0.67	0.172	3,606	2,210	0.72	0.225
1,450	3,713	2,267	0.69	0.203	3,470	2,027	0.75	0.261
1,500	3,612	2,117	0.72	0.238	3,334	1,845	0.80	0.318

Note: Model parameters were obtained from regression analyses conducted using brood year 1969–2005, and 1979–2005 data. Ranges corresponding to the original criteria (<6% risk of a yield <1 million salmon; Carlson et al. 1999) used to establish the SEG range are indicated in bold. Ranges corresponding to escapement needed to produce 90100% of maximum yield (assuming a constant escapement goal policy) are shaded.

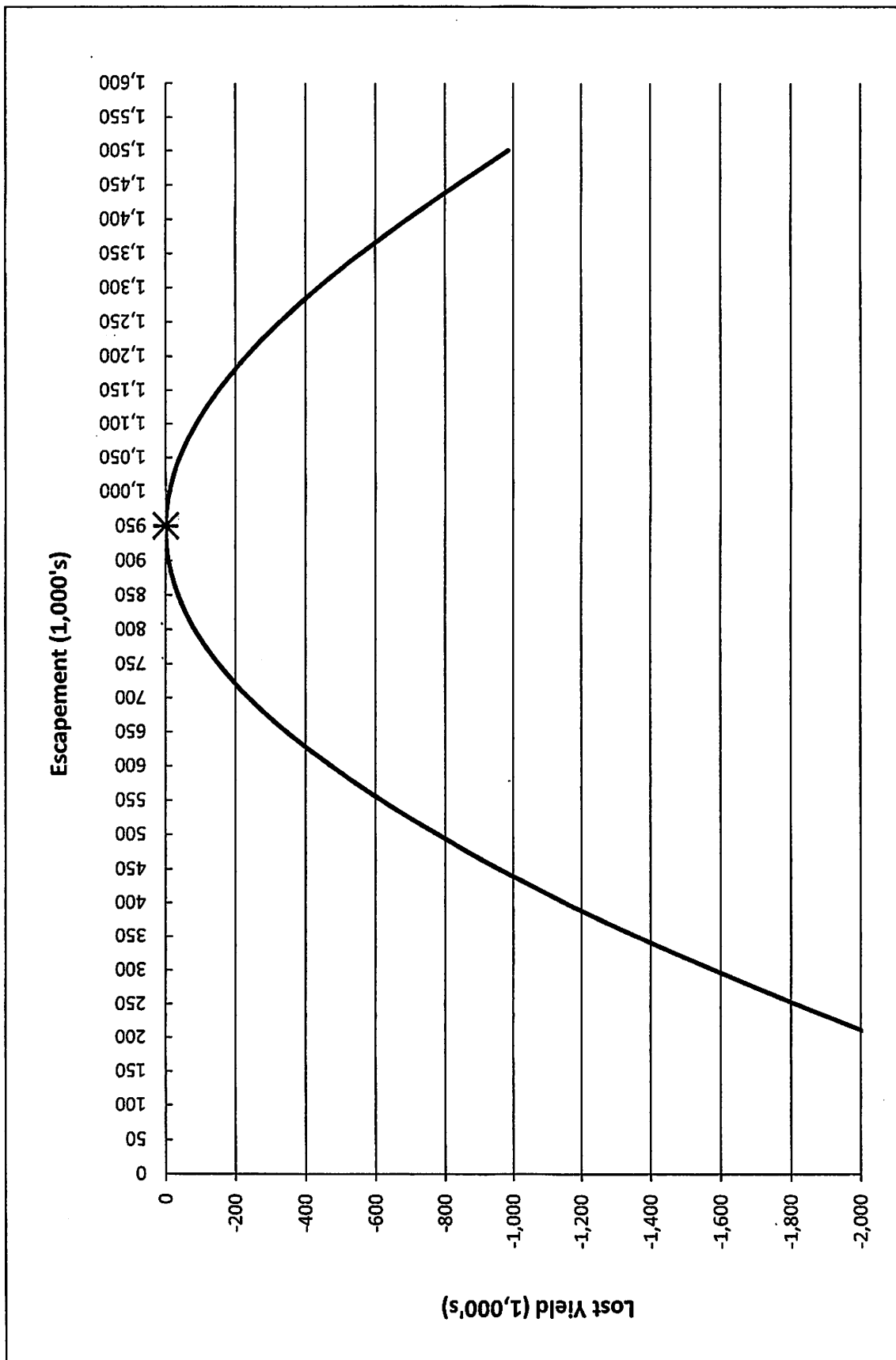
Table 9, page 30 - Fair, et al., 2010

Table 9.—Markov yield table for Kenai River late-run sockeye salmon constructed using data from brood years 1969–2005 (numbers in thousands of fish).

Escapement Interval	n	Mean	Mean	Return per Spawner	Yield	
		Spawners	Returns		Mean	Range
0–200	3	120	679	5.7	559	358–871
100–300	3	165	798	5.0	633	449–871
200–400	2	292	1,055	3.6	763	578–948
300–500	4	414	2,180	5.1	1,766	580–3,419
400–600	9	495	2,450	5.0	1,955	580–3,419
500–700	8	555	3,048	5.3	2,493	999–6,393
600–800	8	724	4,798	6.6	4,075	788–8,697
700–900	7	771	4,731	6.1	3,960	788–8,697
800–1,000	5	931	3,458	3.8	2,527	698–4,840
900–1,100	5	971	3,289	3.4	2,318	698–4,840
1,000–1,200	3	1,148	3,483	3.0	2,335	1,377–3,084
1,200–1,400	3	1,343	2,863	2.1	1,520	513–2,301
>1,300	7	1,623	4,190	2.5	2,566	513–8,396



Figure 1 Lost Yield 1969 - 2005



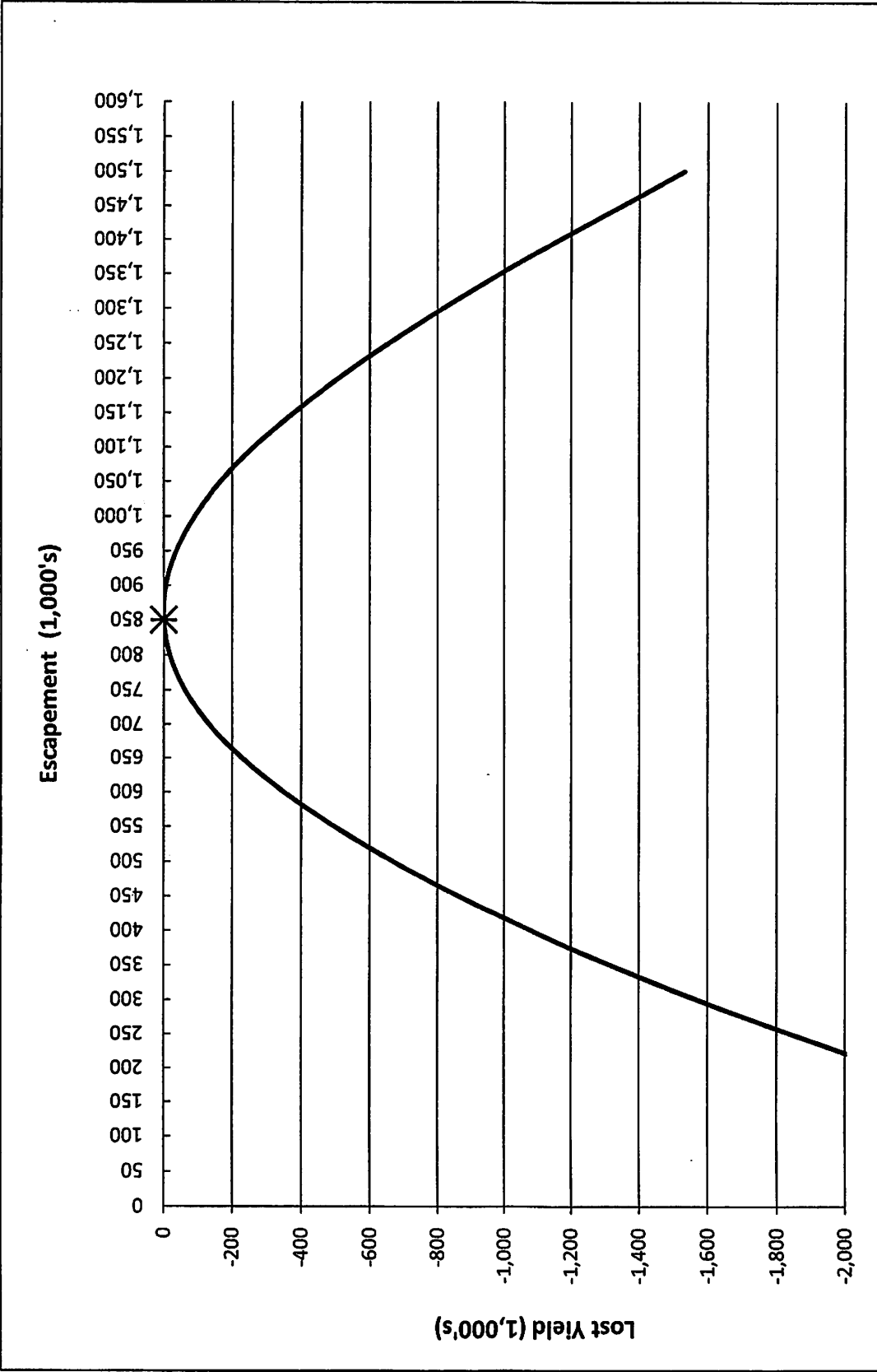


Figure 2 Lost Yield 1979-2005

Figure 2

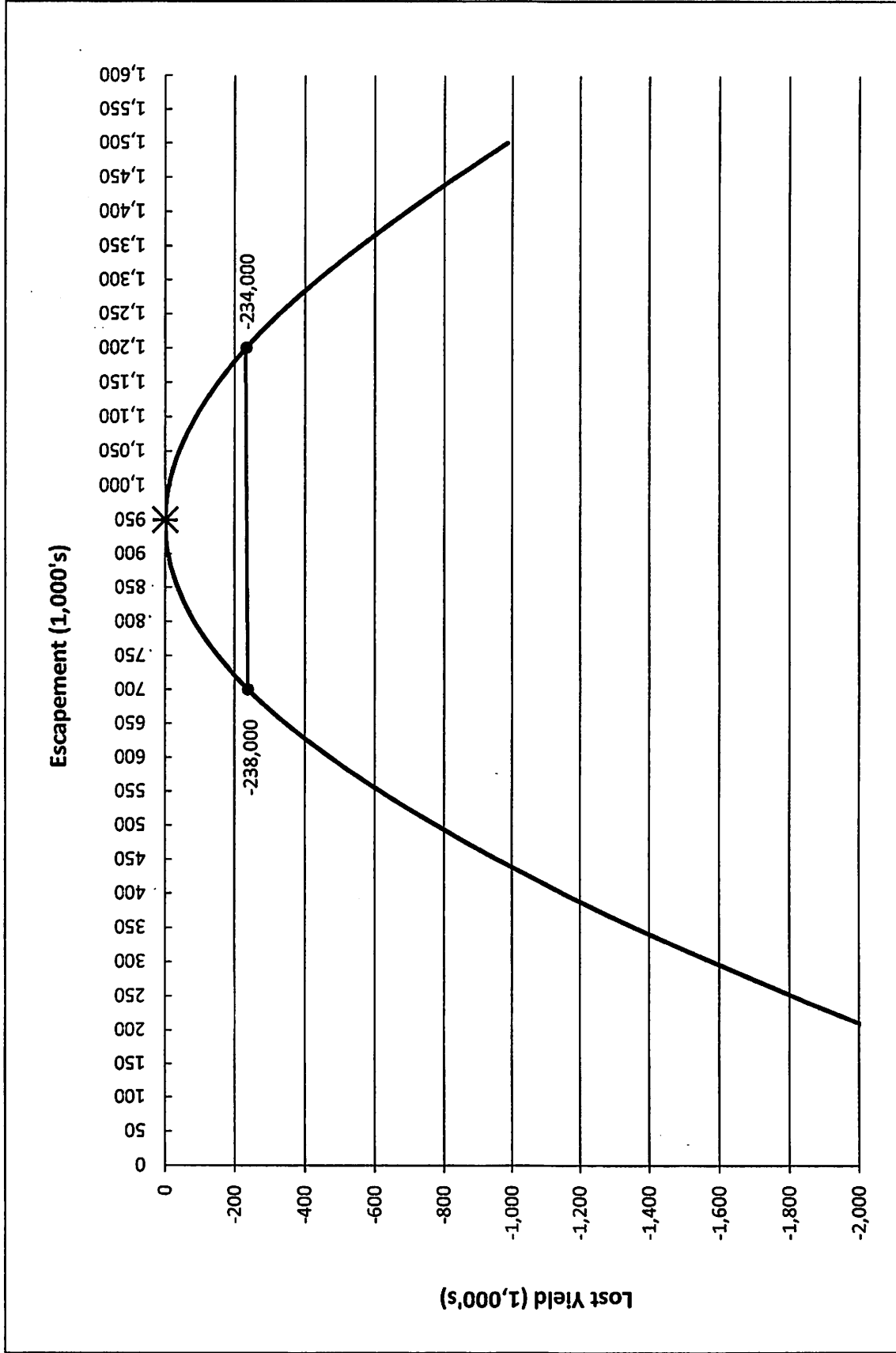


Figure 3 Lost Yield 1969 - 2005

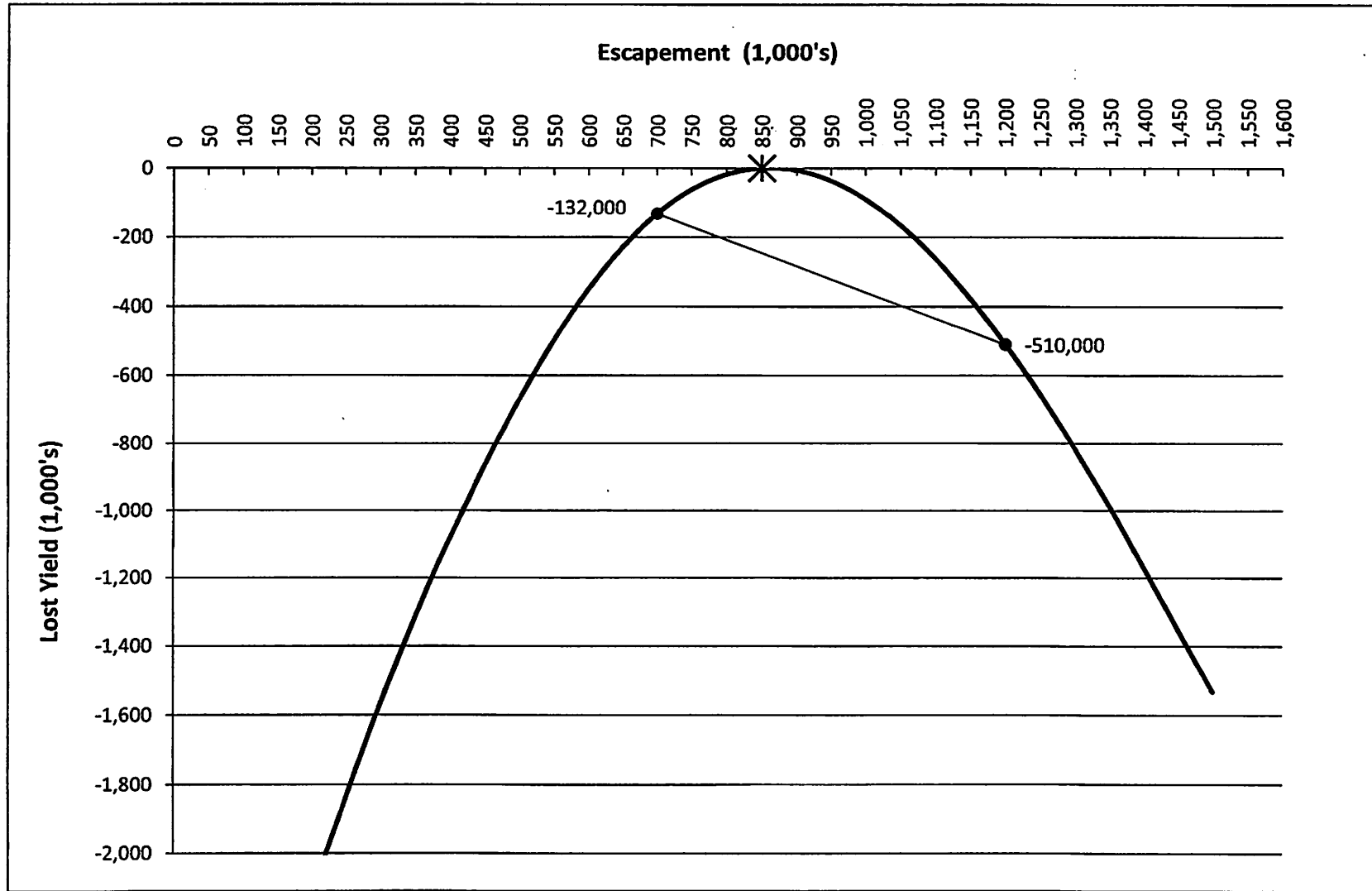


Figure 4

Lost Yield 1979-2005



Figure 5. Lost Yield 1969-2005 - 950,000 MSY

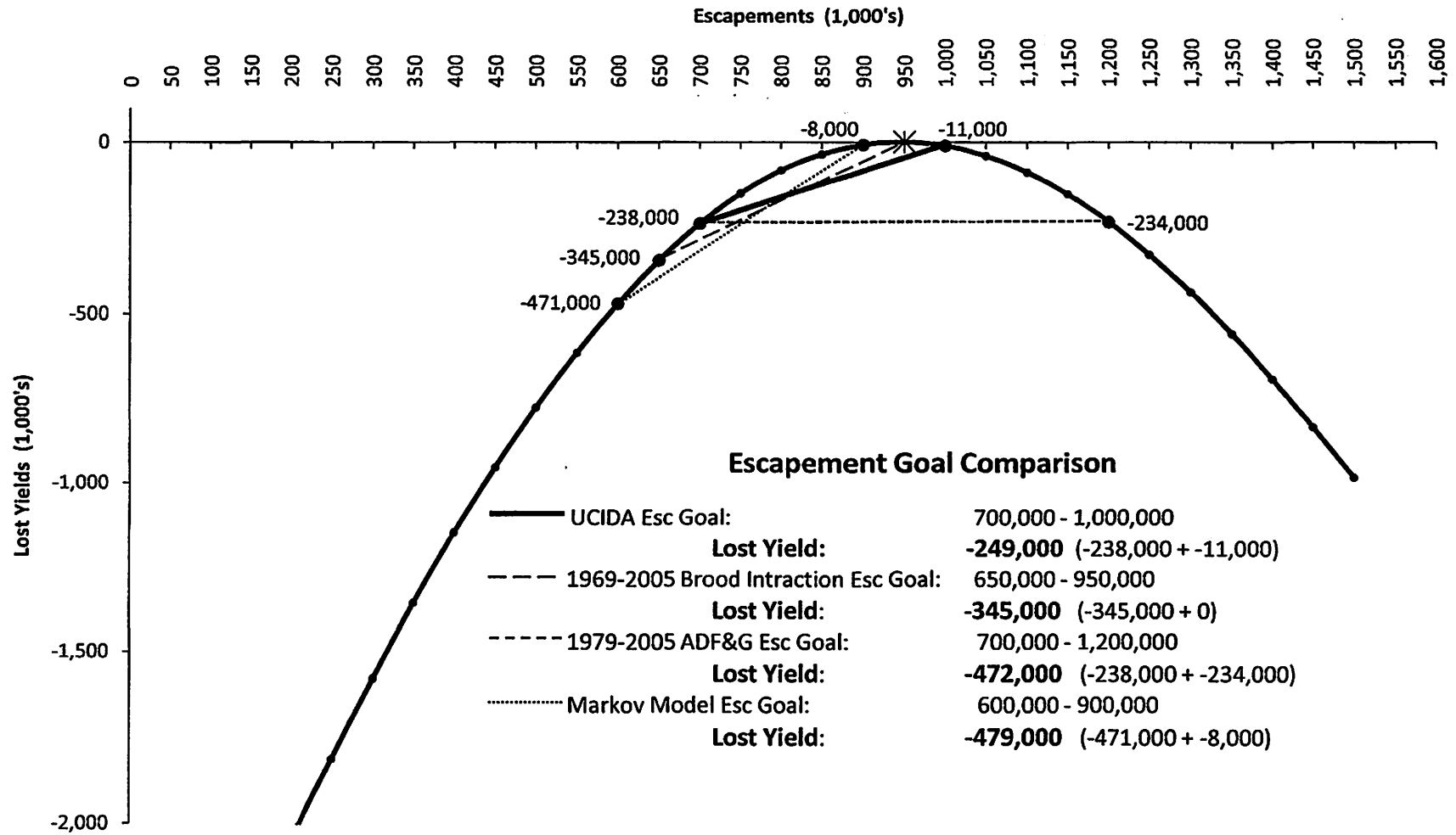


Figure 6. Lost Yield 1979-2005 - 850,000 MSY

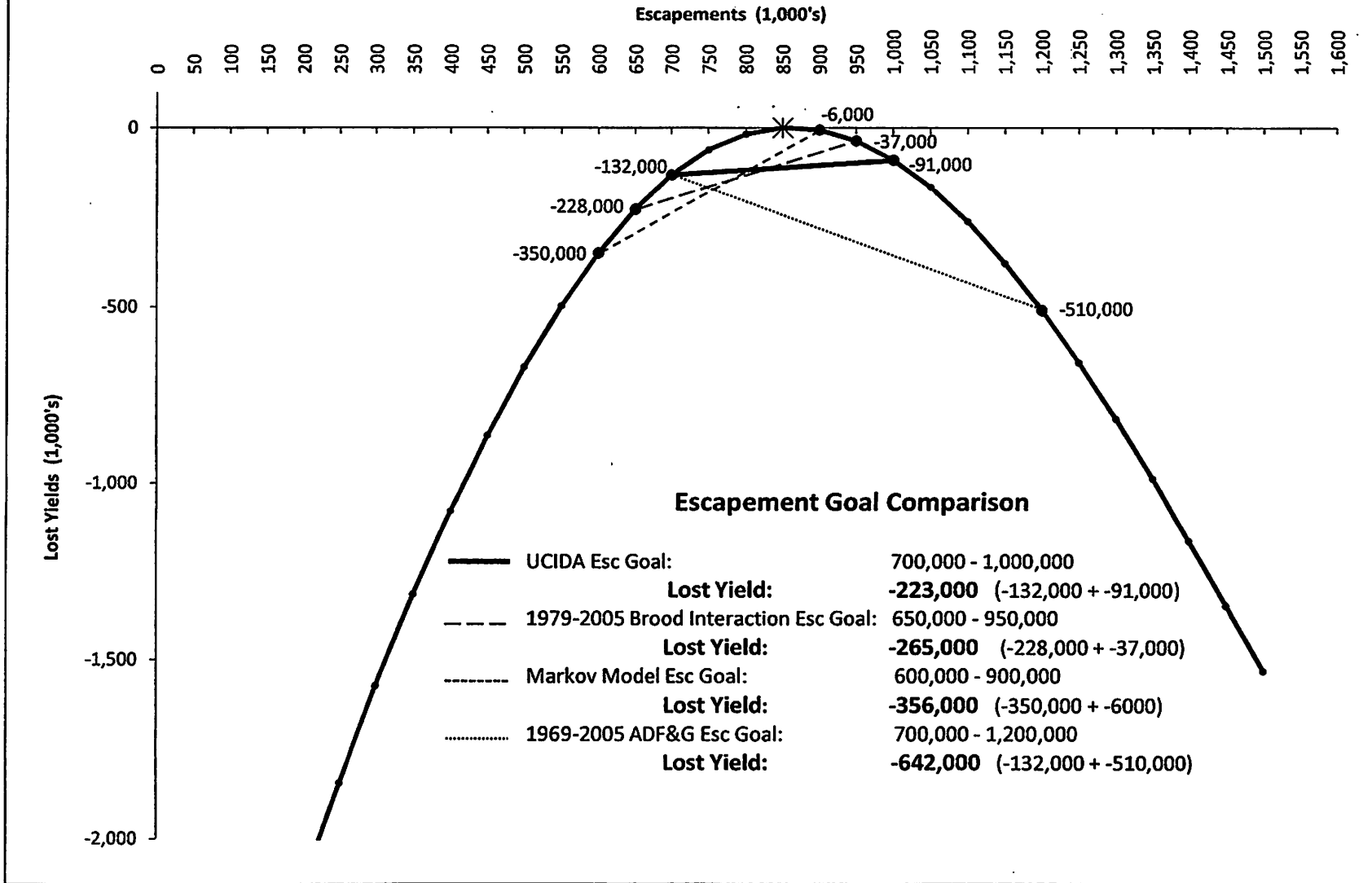
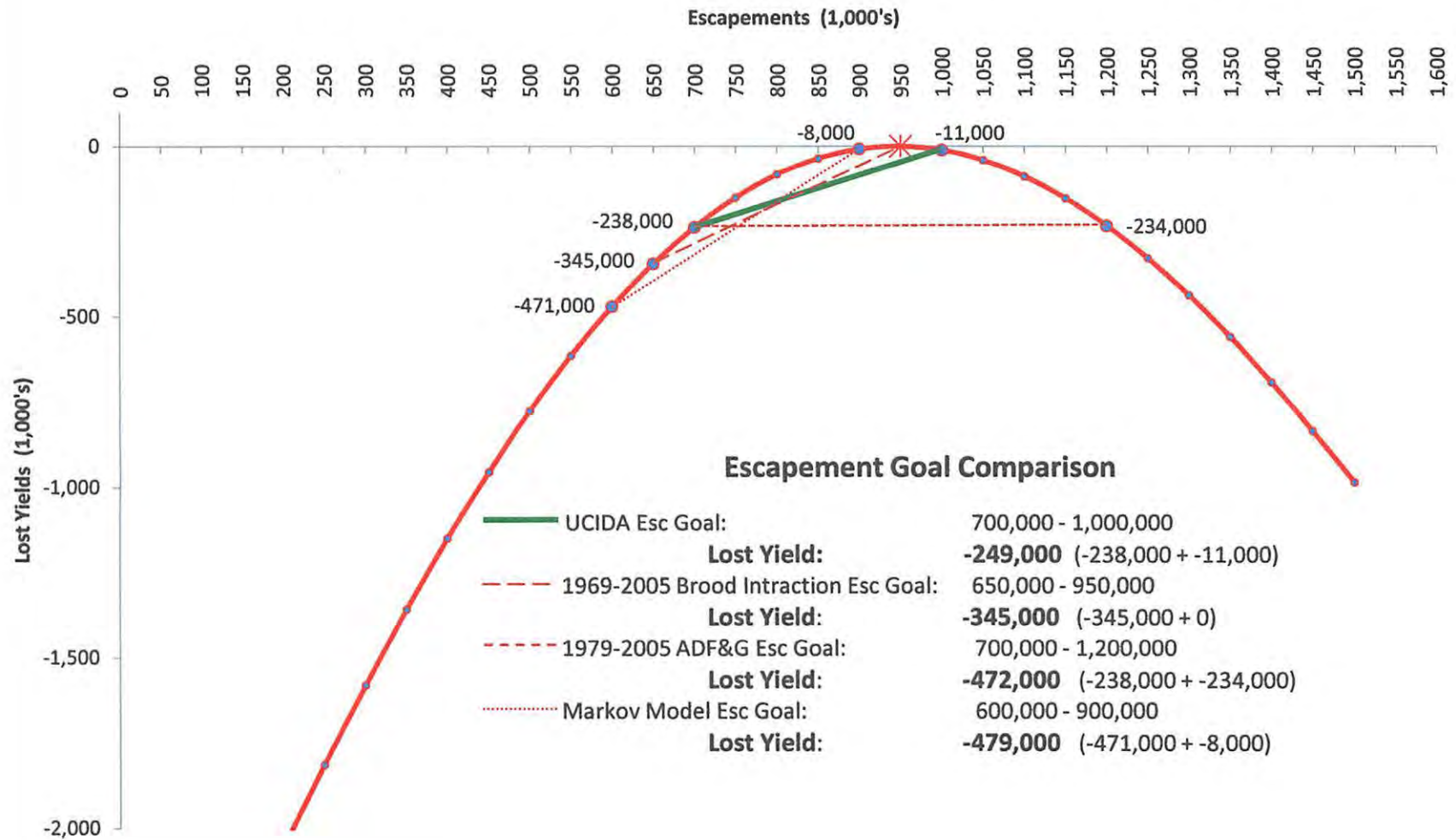


Figure 5. Lost Yield 1969-2005 - 950,000 MSY





UCIDA Newsletter

Founded September 29, 1980

October 2011

This Summers Salmon Catch

	Chinook	Pink	Chum	Coho	Sockeye	Total
Northern District	2,197	408	7,310	19,109	29,240	58,264
East Side Set Net	6,893	14,617	2,753	14,996	1,792,609	1,831,868
West Side Set Net	102	723	2,050	1,795	43,844	48,514
Kustatan	71	5	0	59	2,885	3,020
Kalgin	486	1,213	5,862	13,175	89,608	110,344
Drift Fleet	512	15,161	107,919	37,286	3,135,097	3,295,975
Totals	10,261	32,127	125,894	86,420	5,093,283	5,347,985
Corridor *	208	4,917	25,525	6,817	943,278	980,745
* Included in Drift Fleet Total						
Drift Fleet						
% of Harvest	5%	47%	86%	43%	61%	62%
Average per "D" Boat	1	36	254	86	7,377	7,520
Total Return to UCI	100,000	1 mil	1.4 mil	1.3 mil	8 mil	11.6 mil
Drift Fleet Total Harvest	0.5%	1.5%	7.7%	3.0%	39.0%	28.0%

This year certainly was a good year as compared to the last 10 years! However, as noted above, our total harvests are about 28% of the total salmon returns to Upper Cook Inlet. Even when escapements are accounted for, our overall harvests are about 50% of the harvestable surpluses.

Expanded Corridor vs. Old Corridor, Board of Fish (BOF) Meeting, New Regulations, Emergency Petition, UCIDA Lawsuit, BOF/Commissioner ADF&G, Settlement and BOF Agenda Change Request

As you are probably aware, at the February/March BOF meeting, there were some questionable/ambiguous BOF actions concerning the old, narrow corridor and the new, expanded corridor. The scenarios went like this:

BOF Feb/Mar Meeting

1. July 9-15 - Two (2) regular fishing periods - In 2011: July 11 and 14
 - a. First regular period, July 11 - Remove drift fleet from Area 1 and Old Corridor to Expanded Corridor only

- b. Second regular period, July 14 – Area 1 and the Expanded Corridor. Change was Old, Narrow Corridor to New, Expanded Corridor
 - c. Additional fishing time is allowed only in the Expanded Kenai and Kasilof Corridors.
2. July 16-31 – Four (4) regular fishing periods
- a. Runs below 2.3 million – One (1) period to be restricted to Expanded Corridor and Three (3) full, district wide openings
 - b. Runs from 2.3 to 4.6 million – One (1) regular period per week (2 in total) will be restricted to Area 1 and either/both of the Kasilof and/or Kenai Expanded Corridor(s), two full, district wide openings
 - c. Runs above 4.6 million – Four (4) regular fishing periods with no mandatory restrictions

Emergency Petition by Kenai River Sportfishing Association (KRSA) and the Mat-Su Blue Ribbon Sportsman's Committee

In June, KRSA and the Mat-su submitted an Emergency Petition claiming that there was an error in the published regulations outlined above. This emergency petition asked the BOF to meet and change the published regulations. KRSA asked for the following to be changed by the BOF:

- 1 b. Change Expanded Corridor(s) to Old, Narrow Corridor
- 1 c. Change Expanded Corridor(s) to Old, Narrow Corridor
- 2 b. Change Expanded Corridor(s) to Old, Narrow Corridor

The BOF met on June 30, 2011 and adopted the above three (3) changes to the just published ADF&G regulations for Upper Cook Inlet. Emergency regulations were passed and signed by the Commissioner, Cora Campbell, and signed into law by the Lt. Governor on that same day.

UCIDA filed a lawsuit on July 8, 2011 against these emergency regulations claiming economic harm and that there was **NO EMERGENCY**. All of the "emergency regulations" were fully discussed at the BOF Feb/Mar meeting.

July 12th was the court date for the hearing on economic harm and whether or not an emergency existed.

Temporary Restraining Order (TRO) and Preliminary Injunction Issues Concerning the Emergency Regulations

July 14th Judge Andrew Guidi decided there was a real possibility of economic harm and that **NO EMERGENCY** existed. Practical effects of this decision were:

- Returned us to the newly published ADF&G regulations
- Set aside the BOF emergency regulatory changes in 1b, 1c and 2b
- Established that an emergency does not exist just because the BOF declares an emergency

On August 8, 2011, the BOF met again concerning the 1b, 1c and 2b regulations. This time the BOF instructed the Commissioner of ADF&G to adopt the KRSA proposed regulation changes.

On September 9, 2011, ADF&G Commissioner Campbell met with senior staff and the Directors of Sport and Commercial Fisheries and told them to adopt the KRSA proposed regulatory changes to 1b, 1c and 2b. She decided to adopt these three (3) regulatory changes, even though the public comment period **DID NOT** close until September 12 – so much for public comments and the public process.

We are now awaiting the Commissioner's decision about the three proposed regulatory changes to 1b, 1c and 2b described/referenced above. We expect the Commissioner to forward the Lt. Governor these three proposed regulatory regulations exactly as the BOF instructed.

Kenai River Sportfishing Association (KRSA) also submitted an Agenda Change Request (ACR) to the BOF concerning these exact three regulatory changes.

UCIDA Comments included an Introduction Letter, an Executive Summary and Sections I and IV which included, in part, the following:

Introduction Letter:

Addressee: Kerri Tonkin
Regulations Program Coordinator, Fisheries
Department of Fish and Game
PO Box 15526
Juneau, AK 99811

Dear Kerri,

Thank you for the opportunity to comment on the proposed regulations. We do not think that an error occurred regarding the regulations adopted following the February/March Board of Fish (BOF) meeting. The Emergency Regulations adopted on June 30, 2011 made no sense at all, were biologically inappropriate and had they been put into practice, would have been an economic disaster. These three proposed BOF regulatory changes are just plain wrong and have huge, negative economic consequences. We ask you not to adopt these proposed BOF regulations as there are no biological benefits. Had these regulations been in effect for the entire 2011 fishing season, the drift fleet would have experienced a \$6,500,000 economic loss. This \$6,500,000 million projected loss is in addition to the \$15,000,000 million in direct loss due to removing the Drift Fleet from Area 1. We ask that you take this opportunity to adopt the UCIDA proposed regulations that will provide economic and biological benefits. We feel the regulations adopted by the BOF at the February/March meeting can be improved. UCIDA's proposed changes in Section 1 (see attachment) will increase the biological and economic performance of the Central District Drift Gillnet Management Plan. The stock of yield concern and the action plan need major revisions. Revisions are appropriate now that six years of research have shown that escapement goals are within the anticipated ranges.

Sincerely,

Roland Maw, PhD
UCIDA Executive Director

Executive Summary

UCIDA believes that there were few errors in the regulations adopted following the UCI Board of Fish (BOF) meeting. We further think that these regulations need to be changed. The UCIDA proposed changes will improve the biological and economic performance of several management plans. Had the BOF emergency regulations been put into effect in 2011, UCIDA members would have lost \$6,500,000 in income. This equates to \$15-20 million in lost economic activity for Alaska businesses. The Central District should remain open to the Drift Fleet on all regularly scheduled openings.

The BOF and Department have a 30-year history of drawing numerous open/closure lines that all have failed to meet stated biological objectives. This year is no exception. For over 30 years, everyone relied on the Yentna Salmon Sonar Project to accurately count the returning spawners. In 2006 it was realized that the Yentna River Sonar was not accurate. Generally, the Yentna Sonar undercounted sockeyes. The Yentna Sonar (Bendix technology) was discontinued in favor of operating weirs at three representative indicator lakes: Chelatna, Judd and Larsen Lakes. Thirty years of sockeye salmon escapement data became useless. With 30 years of biased escapement data and 20 different corridor lines, it was impossible to determine whether or not a particular corridor line had met any escapement goal(s). Thirty years of guessing about corridors and escapement(s) should have come to an end. In the future, with the three sockeye weirs at Chelatna, Judd and Larsen Lakes, we might be able to draw an association between a particular open/closure corridor line(s) and Mat-Su salmon escapements.

When the BOF voted (2008) to designate the Northern bound sockeyes a Stock of Yield Concern, we were only 2 years into the weir project. Now, in 2011, we all have just finished the sixth year of operating the weirs and collecting data. In retrospect, had the Emergency Regulations or these BOF proposed regulations been in effect for 2011, all sockeye escapement goals would have been exceeded in UCI. Even with the current regulations, Chelanta Lake and the Kenai River exceeded the upper escapement limits. Since these BOF proposed regulations further limit the time and areas where we can fish, even more sockeyes would already be on the crowded spawning grounds. We see no biological or economic benefits from adopting the proposed BOF regulations as they are not supported by the biological data. We feel that at the UCI 2011 meeting, the BOF acted in haste to remove the drift fleet from Area 1 before the relationship between corridors and escapements could be understood.

Law Enforcement and Compliance Issues

Every time the BOF or Department changes an open/closure line, some law enforcement and compliance issues develop. It just takes time to develop fishing techniques, to fish in a legal manner and to avoid a legal summons. This year is no exception. Many summonses were issued as fishermen tried to fish the Expanded Corridor.

Section I – Status of Northern Bound Sockeye Salmon Stocks

A. Historical Prospective

During the 1960's, 70's and 80's ADF&G staff completed a decade long research project and published "An Estimate of Adult Sockeye Salmon (*Oncorhynchus nerka*) Production, Based on Euphotic Volume, for the Susitna River Drainage, Alaska."

This 1989 study had the following results:

- There are 24 major/minor sockeye-producing lakes in the Susitna River System, including the Yentna Drainage
- Twelve of the 24 sockeye producing lake flow into the Yentna River Drainage
- The 12 Yentna River System Lakes account for 68% of the total Susitna River sockeye production (800,000)
- Chelatna, Judd and Larsen Lakes collectively require a maximum of 123,500 spawners in order to produce a maximum 493,000 return. These three lakes historically required about half of the escapement and produced about half of the total sockeye return to the Susitna River System

B. Current Status

These stocks were designated by the Board of Fish (BOF) in 2008 to be a stock of yield concern. UCIDA was asked by the BOF and the Department to support the stock of yield concern designation for the Mat-Su sockeye salmon. We reluctantly went along with the stock of yield concern designation for the following reasons:

- Research funds were needed to be secured for salmon enumeration, weirs and sonar assessment/replacement
- Research funds were needed to assess the effects of Northern Pike on salmon populations
- Salmon enumeration issues needed resolution
- Genetic analysis was needed to identify stocks temporarily and spatially in the harvest of all users
- Reluctantly understood that our fishing time was going to be restricted to Area 1 during the July 9th - 15th timeframe
- That **no further restrictions** were to occur until such a time as we could determine the relationship to the above restriction and sockeye escapements in the Mat-Su

We held up our end of the understandings, spent our own funds and worked (politically) hard to secure the necessary \$10,000,000 needed for weirs, stock assessments and other research funds.

With the stock of yield concern designation and the accompanying action plan, regulatory changes occurred; stock assessments and enumeration practices were also changed. The drift fleet was restricted to Area 1 with corridor openings for two fishing periods during the week of July 9th thru 15th. There were no restrictions placed on the recreational fishery. The three indicator sockeye lakes had escapement goals established: Chelatna Lake, Judd Lake and Larson Lake. Chelatna and Judd lakes on the Yentna had escapement goals established at 20,000 to 65,000 and 25,000 to 55,000 respectively. Larson Lake is on the main Susitna River and had an escapement goal of 15,000 to 50,000 established. These three sockeye indicator lakes were then to be used to assess the health of Susitna/Yentna sockeye salmon stocks and to gauge the need for future actions. Attached is the current escapement data for Chelatna, Judd and Larson Lakes (CIAA sourced data).

The 2011 escapements to date, August 26, 2011, are as follows:

- Chelatna - Weir escapement count - 70,353, Escapement Goal 20,000 to 65,000 ¹
- Judd - Weir escapement count - 39,656, Escapement Goal 25,000 to 55,000

- Larson – Weir escapement count – 12,161, Escapement Goal 15,000 to 50,000 ²

Note 1: This weir experienced high water over the top of the weir for August 5, 6, 7, 8 and 9th. The count of 70,353 is an actual observed count. However, the weir crew indicated an estimated escapement well in excess of 95,000.

Note 2: Sport fishing guides in the Mat-Su have developed a four-wheeler trail/road to the confluence of Larsen Creek and the Talkeetna River where the guide’s clients specifically target sockeye salmon headed for the Larson Lake weir.

The escapements by lake beginning in 2006 thru 2011 to date, August 26, 2011, are as follows:

Year	Chelatna 20-65,000	Judd 25-55,000	Larson 15-50,000	Yearly Total
2006	18,433	40,633	57,411	116,477
2007	41,290	58,134	47,736	147,160
2008	73,469	54,304	35,040	162,813
2009	17,865	43,153	41,929	102,947
2010	37,784	18,361	20,324	76,469
2011	95,000	39,656	15,000	149,656
6 Yr Average	47,306	42,373	36,240	125,919

Discussion:

The six year averages for all individual lakes fall near the midpoint of the escapement goal ranges. Prior to 2008, the Yentna River had an escapement goal of 90,000 to 160,000. By adding the Chelatna and Judd Lake values (Yentna River system), the six year average for the sockeye escapement is 89,679. While the six year average combined escapement goal of 89,679 is slightly below the old Yentna escapement goal of 90,000 to 160,000, you must realize these escapement numbers are for only **two** of the **twelve** sockeye producing lakes in the Yentna River System.

The six year average for Larson Lake is midway in the escapement goal range. Larson Lake was selected by the department as representing the sockeye escapements in the main stem of the Susitna River System.

During the 2008 BOF meeting, UCIDA supported the stock of yield concern and the data (escapement) collection program. Now, four years later, UCIDA believes the stock of yield concern for Northern Bound Sockeyes and the Action Plan need to be adjusted.

C. Removal of Stock of Yield Concern, Adjustment to Action Plan

The stock of yield concern for Mat-Su Sockeye Salmon stocks and the Action Plan are no longer appropriate and must be adjusted.

UCIDA believes that there is sufficient scientific data to support changing and adjusting the action plan. It was assumed by the BOF, and others, that sockeye production and returns to the Susitna/Yentna System had changed. In the ADF&G 1989 study, the three indicator lakes, during the 1960’s, 70’s and 80’s, 123,500 spawning sockeyes were needed for maximum sustained yield

management. During 2006-2011, six years, the sockeye spawning escapement average was 125,919. From 1968 thru 2011, for the years we have reliable escapement data, these three lakes have been managed at maximum sustainability. During all these 43 years, there has been an active commercial fishery. If there are sockeye salmon production problems in the Mat-Su Area, they are localized and may be occurring on a lake-by-lake basis. If there are individual lake production issues, then the action plan needs to be modified to address specific issues.

UCIDA and its members have borne the effects of the stock of yield concern designation and the regulatory measures. During this entire time, we have historically fished Area 1 during the first regularly scheduled fishing periods during the July 9th thru 15th time period (July 11, 2011). The concerns over our harvests are unfounded.

The stock of yield concern and the Action Plan are no longer appropriate and must be changed. The drift gillnet fleet must be returned to its historical harvest location, Area 1, during the July 9th thru 15th timeframe.

Discussion:

For 30 years, the Department said that the Susitna River, which includes the Yentna, needed 200,000 sockeye spawners.

The Department also said that a 4:1 return per spawner was normal, producing a projected total return of 800,000 sockeyes. No adequate sonar location could be found on the Susitna, so the Department selected a sonar site on the Yentna River. Escapement goals were then adjusted so that the Yentna sonar escapement goal would achieve a minimum of 200,000 sockeyes into the Susitna River system.

During the last six years, these **three** indicator lakes, Chelatna, Judd and Larsen have had an average of 126,000 sockeye spawners. There are over **24 lakes** that produce sockeye salmon in the Susitna River drainage.

Discussion:

The July 9-15 is thought to be the most important dates necessary to ensure adequate sockeye salmon escapement into the Northern Cook Inlet. Run timing data presented by the Department for these stocks indicated that Northern Sockeye Salmon stocks passed by Anchor Point and Offshore Test Fishery (OTF) on June 30, one year, July 10-15, two year and August 1, one year. It appears that the Northern District sockeye stocks were early in 2011. This is supported by the early, rather large weir counts, indicating another early, prior to July 9-15, run entry pattern. We will not know for sure until the genetic samples are processed from the OTF and commercial catches. For three out of the last five years, these July 9-15 restrictions were ineffective and inappropriate and have cost our industry tens of millions of dollars for NO particular benefit(s). The BOF just got run timings and these closures wrong. We find the BOF ignored the biological run timing facts and acted arbitrarily, without a basis for these July 9-15 restrictions.

There is a significant policy difference between a yield concern and a conservation concern as defined by the Sustainable Salmon Fisheries Policy. The BOF, public and some departmental staff failed to clearly differentiate between these two policy definitions.

Section IV – Summary of Upper Cook Inlet Drift Gillnet Salmon Fishery

The 2011 preseason forecast for the UCI salmon fishery was slightly above the 20 year average. We had a new set of BOF regulations that had yet to be tested in the real world of day-to-day management. This season will be discussed in four time periods: (1) June 20th thru July 9th; (2) July 11th; (3) July 14th thru August 1st and (4) August 2nd thru August 11th (present). For your references, see the attached day-by-day 2011 Drift Gillnet Preliminary Catch Data and 2011 Set Net Preliminary Catch Data (ADF&G sourced).

A. June 20th thru July 9th:

This time period was normal. The drift fishery started June 20th with 90 vessels that gradually increased to 332 vessels making deliveries on July 4th. The number of salmon harvested also gradually increased from 3,845 harvested on June 20th to 88,891 harvested on July 7th.

B. July 11th:

The first 2011 regular fishing period in the July 9th thru July 15th time frame.

July 11th was the most critical day of the entire season. The new BOF regulations removed the Drift Fleet from Area 1 and restricted our harvest efforts to the Expanded Kasilof and Expanded Kenai Corridors. On July 11th, 366 vessels harvested 104,183 sockeyes for a catch per unit (vessel) effort (CPUE) of 284 sockeyes.

On July 11th there was a large school of sockeyes located in the very southwest corner of the Expanded Kasilof Corridor. Most of these 104,183 sockeyes were harvested by less than 100 drift vessels, CPUE of 1,000, all crammed into a tiny corner of the Expanded Corridor. The other 260 vessels harvested very few salmon, CPUE of less than 50 per vessel. Had the Drift Fleet not been restricted and had been allowed to harvest salmon in our traditional Area 1, there would have been a CPUE of at least 1,000 for the entire drift fleet.

1. Specific problems arising out of being restricted out of Area 1 and into the Corridors on July 11th:
 - This is a critical time of the season regarding ADF&G's ability to access both sockeye salmon run timing and run strength (numbers). The CPUE's per fishing period are compared to the past 30 years' CPUE's per fishing period to assess both run timing and run strength. Nowhere in the history of this fishery was there a comparable CPUE on this date. Due to an unreliable CPUE, the Department was unable to assess the run timing and strength on July 11th, 12th and 13th. The Department was managing with unreliable data, otherwise, "flying blind"
 - By being restricted out of Area 1, we, as a Drift Fleet, were prevented from harvesting salmon in our traditional areas. The salmon we traditionally would have harvested on July 11th were then added to the salmon available for harvest on July 14th
 - The 60-70 Homer-based drift boats were forced away from their home port and traditional fishing areas about 5 days earlier than in prior years. This negatively affected the economy of the Homer area, reduced raw fish taxes, reduced harbor fees and reduced sales taxes

- Fish buyers and processors were caught “a bit off-guard” and had staff, ice and salmon processing capacity in the wrong locations. Some vessels now staged in the Kasilof River were not loaded until the afternoon of July 12th. Some loss of salmon quality occurred
- The fishery was not orderly, as directed by State Statute

C. July 14th thru July 31st:

1. On July 14th, the Drift Fleet harvested 685,435 sockeyes for a CPUE of 1,631 per vessel. This was both the largest harvest and largest CPUE for Upper Cook Inlet Drift Vessels. While we are grateful for this harvest, this harvest of salmon totally overwhelmed the fish buyers and processors and also had catastrophic consequences, such as follows:
 - Fish quality suffered from lack of ice, crushing and bruising of salmon on vessels, heavily loaded totes and brailers and a lengthy period before processing
 - Ice capacity was insufficient and was totally depleted just trying to keep these 685,435 (4,660,000 lbs) salmon cool
 - These 685,435 sockeyes were in addition to the 26,586 harvested by the Set Nets. With the additional 666,137 sockeyes harvested on July 16th, the canneries were plugged
 - Many drift vessels not unloaded until the evening of July 15th
 - Price drop occurred ranging from \$.20 to \$1.20 per lb
 - Price drop remained in place for the remainder of the season for both Drift and Set Net salmon harvested.
 - All fish buyers and processors put delivery limits on Drift vessels and Set Net fishermen
 - **This price drop for both the Drift and Set Nets amounted to lost income of over \$15,000,000, an additional \$30,000,000 to \$40,000,000 to the Kenai as well as the Alaskan economy**

Discussion:

UCIDA and KPFA outlined these future events and consequences to the BOF and Department. **Now, history proves us right.** Had the Drift Fleet been in Area 1 on July 11th, 2011, we would have harvested, at a minimum, an additional 300,000 sockeyes. These 300,000 sockeyes would have produced a usable CPUE for run timing, run strength and analysis by the Department. Also, these 300,000 sockeyes would have directly reduced the 685,000 sockeye harvest on July 14th, 2011. Fishing Area 1 would have provided 3 additional days of processing and “preparation time” for fish buyers and processors. An orderly fishery could have occurred, quality of the salmon pack could have been maintained and the **\$15,000,000 to \$40,000,000** error avoided. The BOF just plain screwed up and made a **\$15,000,000 to \$40,000,000** regulatory error by removing the Drift Fleet from Area 1 on July 11th. Both the Commissioner and the BOF have a statutory obligation to develop orderly fisheries. While we appreciate the efforts of the Department to try to maintain an orderly fishery, this season was a mess and the **\$15,000,000 to \$40,000,000** error lies directly upon four board members of the BOF. This entire July 14th thru August 1st period is characterized by lack of ice, quotas and limits on both gear types, price drops and a scramble by all involved to harvest the return. It was all caused by the new BOF regulations that took the Drift Fleet out of Area 1 on July 11th. The \$15,000,000 price drop/quality error is in addition to the \$6,500,000 dollar error that will occur if the drift fleet is removed from the Expanded Corridor into the old narrow corridor.

C. August 1st thru August 18th:

The sockeye catches were dropping as escapement goals were again exceeded. There is a lack of regulatory clarity concerning sockeye escapements, king escapements and the 1% rule for the Drift Fleet and the East Side Set Netters.

ACR submitted by Kenai River Sportfishing Association

ACR #5 is yet another attempt to set aside the Feb/Mar BOF regulations by modifying 1b, 1c and 2b, see previous discussion. ACR #5 will be discussed by the BOF at its workshop on October 4 and 5 in Anchorage.

Our legal costs involved due to the KRSA "Emergency" and the BOF illegalities are in excess of \$80,000.

September 21, 2011, UCIDA, the State of Alaska, the BOF and Commissioner Campbell agreed to a stipulated settlement of this lawsuit. This agreement reads in part:

1. Plaintiffs will suffer irreparable harm to their livelihoods due to the emergency regulations passed by the Board on June 30, 2011 if the Temporary Restraining Order and Preliminary Injunction are not granted;
2. Plaintiffs have shown that, at trial, they will likely prevail on the merits on some or all of their claims against the Defendant; and
3. The balance of hardships favors granting the Temporary Restraining Order and Preliminary Injunction.

Based on the above findings, IT IS HEREBY ORDERED:

1. Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction are GRANTED;
2. Defendants State of Alaska, Alaska Department of Fish and Game, and Alaska Board of Fisheries are immediately enjoined from enforcing the emergency regulations passed on June 30, 2011;

September 11, 2011, one day before the close of public comments, UCIDA submitted these 32 pages of comments concerning the three (3) proposed regulatory changes.

United Cook Inlet Drift Association
43961 K-Beach Road, Suite E • Soldotna, Alaska 99669
(907) 260-9436 • Fax (907) 260-9438 • info@ucida.org

First Name: _____ Last Name: _____ M.I.: _____
Address: _____
City: _____ State: _____ Zip: _____
Phone (____) _____ - _____ Email: _____
Permit # SO3H _____ ADF&G License # _____
Fishing Vessel Name: _____

UCIDA Membership Dues (for 12 months):
\$200/Permit Holder • \$25/Associate

Comments about the 2011 Sockeye Return

The number of six year olds in this year's Kenai return was three times the historic "average." These six year olds as fry spent two summers in Skilak Lake. The ocean survival was in excess of 30% for these same salmon. A "normal" ocean survival rate is in the 10% to 15% range.

A little bit of Kenai River Salmon biology: you may have thought that salmon spawn and their offspring return in 4 or 5 years. Actually, the Kenai River Sockeyes have one of the largest adaptive survival capabilities.

Age composition of sockeye salmon escapement in the Kenai River, Upper Cook Inlet, Alaska, 1979 to present

Year	0 ^{1,2}	1.1	0.3	1.2	2.1	1.3	2.2	1.4	2.3	3.2	2.4	3.3	Total
1979		0.2		19.6		63.0	10.6		6.6				100
1980		6.1		35.4	0.9	36.7	14.4		6.5				100
1981				19.7	0.5	66.4	7.9		5.3				100
1982		0.1		5.8		87.5	2.9		3.7				100
1983		0.3	0.3	8.4	0.5	79.0	2.2	0.3	8.9		0.1		100
1984	0.1		1.1	23.1	0.5	37.8	13.2	3.6	19.5	1.0		0.1	100
1985	0.5	0.1	0.2	15.9	0.1	56.4	14.7	0.3	11.4	0.3			100
1986	0.1		1.3	31.8	0.3	39.5	8.2	0.7	18.0		0.1		100
1987			0.1	12.8		78.4	3.2	0.1	5.2				100
1988		0.3	0.1	11.6	0.2	74.2	3.1	0.4	10.2				100
1989	0.1	0.2	0.1	5.6	0.8	26.7	7.6	0.9	57.4		0.3		100
1990		0.6	0.3	21.6	0.3	41.4	13.7	0.6	21.1	0.2	0.3		100
1991	0.0	0.1	2.2	48.2	0.4	31.6	5.7	0.2	11.4	0.1	0.0		100
1992	0.1			2.7	0.3	79.9	5.9	0.2	11.0				100
1993	0.1	0.3	0.3	12.2	6.3	30.5	6.4	2.6	41.2	0.1	0.1		100
1994	0.1	0.3	0.1	6.6	0.8	61.1	17.8	0.8	12.1	0.2	0.3		100
1995		0.3	0.4	31.9	2.4	26.4	6.6	0.4	31.3		0.3		100
1996			0.3	10.8	0.7	75.4	6.1	0.3	5.4	0.2	0.6		100
1997		0.1	0.3	7.6	0.4	75.2	2.8	0.4	13.0	0.1	0.1		100
1998		0.3		27.1	6.6	40.7	9.6	1.3	13.9	0.1	0.1	0.1	100
1999			0.3	15.1	1.2	55.4	16.8	0.4	9.6	1.0	0.1		100
2000		0.2	0.9	15.3	2.6	55.1	9.4	1.0	14.5	0.7	0.5		100
2001		0.3		10.8	1.5	68.9	8.3	0.8	9.2			0.2	100
2002	0.1		0.0	23.0	0.7	58.4	10.6	0.7	6.1	0.1	0.1	0.0	100
2003	0.1	0.0	0.2	14.4	0.1	57.9	8.0	0.4	18.7		0.1		100
2004			0.4	10.1	0.2	69.1	8.2	0.2	11.1	0.2	0.2	0.2	100
2005	0.1		0.2	2.8	0.2	81.3	2.8	0.3	11.8	0.5	0.1		100
2006			0.5	9.9	0.4	38.7	3.7	2.4	44.0	0.1	0.4	0.1	100
2007			0.1	5.9	0.7	78.8	4.4	1.5	7.8	0.1	0.7	0.1	100
2008			0.4	15.2	0.7	60.8	7.4	4.6	10.8		0.2		100
2009		0.3	0.1	6.1	0.1	72.6	9.8	0.9	9.7	0.1	0.1		100
2010	0.1	0.2	0.1	23.4	2.8	44.4	4.7	0.2	23.9	0.1			100
2011		0.1		8.0	1.1	38.9	5.4	0.4	45.6		0.1	0.1	100
Mean	0.1	0.5	0.4	15.7	1.1	57.2	7.9	0.9	16.2	0.3	0.2	0.1	

Notes to Table:

1. First number = years in fresh water
2. Second number = years at sea

Example:

- 0.2 0 = hatch and go to sea .2 = 2 years at sea
- 1.2 1 = 1 year in fresh water .2 = 2 years at sea
- 2.2 2 = 2 years in fresh water .2 = 2 years at sea
- 2.3 2 = 2 years in fresh water .3 = 3 years at sea

Spawn year – In all cases, except 0.2 and 0.3, add one year in order to back calculate the spawn year

Example:

- 1.2 = 3 years + 1 egg year = 4 years old
2011 = 4 years = 2007 spawn year
- 1.3 = 4 years + 1 egg year = 5 years old
2011 = 5 years = 2006 spawn year
- 2.3 = 5 years + 1 egg year = 6 years old
2011 = 6 years = 2005 spawn year

The dominate return, as measured by the highest mean, are the 1.3 or 5 year old fish (57.2% - See Table above). Next are the 2.3 or 6 year old fish (16.2%). The next dominate age class are the 1.2 or 4 year old fish (15.7%). Please note that salmon, when managed at or near the Biological Escapement Goal (BEG), spend one year in fresh water. That is the rule throughout their range, Oregon to Japan/Russia. When BEG management is practiced, the 1.2, or 4 year olds, are the majority of returning adults. That is true for Kasilof, much of Bristol Bay and sockeye returns in Japan and Russia. However, as Kenai sockeye have adapted into a 1.3, or 5 year old, dominate year class. (See Table) This is in part why Kenai sockeyes are some of the largest in the North Pacific. Additionally, our Kenai Sockeyes often have a unique 2.3, or 6 year old, adaption. (See 2.3 data in Table) These 6 year olds spend two years in fresh water after hatching. These two years in fresh water is an adaption that is expressed when high escapements (overescapement) occur. This is a life survival strategy that develops in order to ensure that the fry/smolt are physically large enough to survive at sea. This year we had 2.1 (1.1%), 2.2 (5.4%), 2.3 (45.6%) and 2.4 (0.1%), for a combined percentage of 52.2% of this year's return that spent 2 years in fresh water. Again, this is due to large escapements, or big fry populations competing for a limited food supply.

Hopefully, you are feeling a bit more comfortable with this data. Some of our larger returns, not always, occur when, in a single year, we have above average 2.3 (6 year old) salmon return in addition to the 1.2 (4 year olds) and 1.3 (5 year olds). This year, see Table above, we had 45.6% of the return in the 2.3 (6 year old) age class.

Most of the preseason prediction models are based on either a 1.2 (4 year old) or 1.3 (5 year old) return data sets, Kenai included. We are in uncharted territory, as these Kenai River return models are based on 1.2 and 1.3 historic data. Now the norm is for 2.3 (6 year old) returns and there is just not an historic data set upon which to build a good predictive model for preseason forecasting. Only four times, 1989, 1993, 2006 and 2011, have the 2.3 (6 year old) been over or near 50% of the return. From a practical management standpoint, ADF&G has a very difficult time in

determining in-season age composition of the returns. It takes a few days/week(s) to collect scale samples and run the age composition analysis. At the same time, trying to determine the tier the current return most likely fits into: less than 2.3 million, 2.3 - 4.6 million or greater than 4.6 million. Look at 1989, 1993, 2003, 2008 and 2011, all are markedly different in age compositions and run size.

Please give some thought and provide suggestions to UCIDA as to how we might speed up the in-season age analysis and run size determination. Our management plans are so complex and assumes that ADF&G and our industry know the age composition and run size. Just now, the last week of September, is the age composition actually known. There is limited age composition occurring in the first 2 to 3 weeks of July.

Run size and Maximum Sustained Yield

In order to use any model or procedure to determine maximum sustained yields, the age composition and return sizes must be completed.

To determine the total adult return from any spawning escapement, we must know the age composition, number and percentage from all the possible freshwater and saltwater combinations.

For example, we must determine the percentage and number of adult returners for all the 0.2 thru 3.3 age combinations. Finding the return per spawner may take up to 6 to 8 years after the spawning occurred. We will have to wait until 2017 or 2018 to see all the returning adults from the 2011 spawn.

ADF&G has compiled this type of data since the early 1970's. This spawning/return data is included in the table below. This table was constructed using the Markov type of analysis.

Escapement Interval (1,000's)	n	Mean Spawners	Mean Returns	Return per Spawner	Mean Yield	Yield Range
0-200	3	120	679	5.7	559	358-871
100-300	3	165	798	5.0	633	449-871
200-400	2	292	1,055	3.6	763	578-948
300-500	4	414	2,180	5.1	1,766	580-3419
400-600	9	495	2,450	5.0	1,955	580-3419
500-700	8	555	3,048	5.3	2,493	999-6393
600-800	8	724	4,798	6.6	4,075	788-8697
700-900	7	771	4,731	6.1	3,960	788-8697
800-1000	5	931	3,458	3.8	2,527	698-4840
900-1100	5	971	3,289	3.4	2,318	698-4840
1000-1200	3	1,148	3,483	3.0	2,335	1377-3084
1200-1400	3	1,343	2,863	2.1	1,520	513-2301
>1300	7	1,623	4,486	2.7	2,863	513-8396

Notes to Table:

1. Escapement intervals are increased by 100,000 utilizing 200,000 ranges.
2. For each range/interval, information is displayed from the historic data set.

The highest mean return(s), 4,798 and 4,731, occur at escapements of 600 – 800 and 700 – 900 (thousands). At these 600 – 800, 700 – 900 or 600-900 spawners, the highest returns per spawner of 6.6 and 6.1 occur, the largest mean returns of 4,075 and 3,960 occur and the largest yields (harvests) of 788,000 – 8,697,000 also occur. At escapements above 1,300,000, there appears to be an increase in yield. These consecutive large escapements are not sustainable year after year.

This year's 5,700,000 Kenai return came from 2005, '06 and '07 spawners. It is important to understand this. The 2011 return had a large 2005 and a normal 2006 and 2007 adult returns all occurring in the same year. Will this pattern of 3 years of concurring returns continue into 2012? Well, we will know next August. Frankly, there is just no way of knowing that now. If these three years of concurring returns happens next year, we could have a very good, better than this year, return next year. However, if we fall back into one dominate year class return, our return next year could be average for the Kenai. The ADF&G staff is struggling to understand the inner play between escapement (overescapements) and this effect on the age and number of returning adults. We are in uncharted biological territory, all due to large overescapements. Instability and lack of predictability will be our companions until we get BEG/MSY management back!

UCIDA member Steve Vanek asked that the following letter be included in the next newsletter:

September 2011

Dear drift permit holder:

If you made more than 30 thousand dollars this year and haven't contributed at least \$1,000 to the legal Defense fund then you must immediately send at least \$1,000 to the **FISHERMEN'S LEGAL DEFENSE FUND** in care of UICDA. If less than \$30,000 then at least \$500.

Why? I'll tell you why! I've been drifting in the Inlet since 1966. There is no better way to live than as a fisherman. There is nothing, nothing more exciting than watching your net light up with fish hitting the cork line.

I'm 71 years old, but I saw my net explode this summer. But this is going to end if **you** don't act. The \$1,000 is tax deductible so it really is only \$700. Why give Uncle Sam the other \$300?

The lawyers are quitting because funds have run out. The Board of Fish will have an agenda change request before them in October put in by Kenai River Sportfishing Assoc. and the Mat-Su Blue Ribbon Committee to end the Area 1 and Expanded Corridors during the critical times when fish are there.

The Commissioner of Fish and Game has been ordered by the Board of Fish to do this if the Board can't do it themselves. We can stop both of these actions in court but it takes money to do it. The penny a pound that some of us have signed up for will help, but not everyone signed up. Even if you signed up, we need the money now not later. The processors matching penny will be used for lobbying and Public Relations work, not for court action.

If this letter sounds angry, you better believe I'm angry. I've spent years and years testifying at Board of Fish meetings, contributing to politicians whom we thought would help us, all to no avail. Our last resort is the court. We had a first victory this summer with the Temporary Restraining Order that allowed us to fish in Area 1 and the Expanded Corridor. Now this is about to be reversed unless we take action in the courts.

Being 71 I still have a few more years to fish. But I ask myself, what's the point? I'm tired as well as angry. I'm tired of putting all these years in while most others do nothing. If you can't match the \$1,000 I put in, then you deserve to fish in the narrow ½ mile Corridor. I don't fish in that corridor anymore so I may not be fishing at all since that is all that is left.

PONY UP YOUR \$1,000 NOW NOT TOMORROW!!!

We have a chance. Don't let it go by!

Steve Vanek, F/V **Monica J**

President's Message

It was sooo nice to finally have a good salmon season in Cook Inlet. I call it a healing year so we can make some long put off repairs, improvements and payments. This year's large fish run should be the norm, not the once in every ten year occurrence. This would be the norm if the management plans were developed to produce maximum sustained yields (MSY) using the best available science and biology data. Unfortunately, the State is managing Cook Inlet strictly political and has no intentions of changing this political management. The science and data are not considered. We found this out at the Feb. 2011 BOF meeting where we were chastised for even bringing up data and facts. Facts aren't needed for allocative agendas!

To understand why the State would do this, we have to know why and who the driving force behind it is. The "why" is basically greed and money because some groups and individuals want commercial fishing in Cook Inlet closed, or at least severely restricted so all the salmon go into the rivers for the guiding and recreational fisheries. The "who" is basically Kenai River Sportfishing Association (KRSA) and the Mat-Su Blue Ribbon Sportsman's Committee and affiliates that represent the interest of the in river guiding and lodge/tourism industry. They are highly financed, mainly from the Kenai Classic, and are very effective and persistent at lobbying the legislature and government agencies to get like-minded people in regulatory positions. I have been in fish meetings with a lot of these same people over the last 30 years and they have told me that their goal is to get rid of commercial fishing in Cook Inlet by any and every means possible. There is no compromise! Some legislators get campaign money from these groups and therefore tote their water. They have told me that they are doing what their constituents want. Constituents do not include the commercial fishing industry or what is best for the resource, jobs and local economies. Don't forget what Bob Penney said years ago about our salmon and that was to put them all in the river. If we only get a million come back that's enough for the sports fishery. We don't need a commercial fishery!

The federal Magnuson Stevens Act has ten very good national standards that the states must comply with in managing salmon. Some of the standards include using the best available science to manage for MSY to have sustained participation and minimize adverse impacts to fishing communities. Ask UCIDA for the other standards.

Lance Nelson, who is the State's legal authority for the Board of Fish, has said that the State's position is the State doesn't have to manage salmon under Magnuson. The position of four BOF members, some legislators and some in ADF&G is that salmon should be managed socially, not biologically and as long as the salmon runs are sustainable, even at a low level, then they are doing their job. In other words, if the people want more fish in the river then they will have them, even at the expense and demise of the commercial fishing industry. No MSY management, no such thing as over escapement and no need for using the best available scientific data. This is the structure of Cook Inlet's management plans and escapement goals now and it will only get worse.

The North Pacific Fishery Management Council, who is supposed to have a federal management plan (FMP) for salmon that is compliant with Magnuson and also to oversee that the state manages salmon under this plan, is not doing their job. The FMP has not been revised since 1990 and the feds have a Dec. 31, 2011 deadline to do it. The Council's solution to comply with this deadline is to relinquish salmon fisheries in the three EEZ fisheries, Cook Inlet, Area M and Prince William Sound, from the FMP and turn the management of salmon in these areas completely over to the State. What this means to these fisheries is that the State will have total management with no oversight from anybody and no

compliance with Magnuson. Also, we will have no avenue for any appeal. In Cook Inlet this could mean no more fishing in Area 1 and possibly the middle of the Inlet altogether, and possibly only the three mile corridor, which I believe is their goal. No MSY management, escapement goals set with no high end limits, more mandatory time and area restrictions, only a few days of fishing (remember 2006), gear restrictions, no more D boats, one net per set net, possible shallower nets and the season closing on July 31st or earlier, etc. Any of these scenarios are possible with this or any other BOF and with no accountability for the State. In essence, a waste of the harvestable resource, jobs, livelihoods, high protein food source and depleted future returns resulting in a non-functional, unstable fishery. How many processors and support businesses will be left? Less competition means lower prices. Your permit, boat and set net sight will be greatly devalued!

I don't want to sound all doom and gloom, but by going to all the meetings through the years and the witnessing the results of our current management plans and agencies, this is the direction the State is taking our fishery. I am very optimistic though! Timing is critical and our window of opportunity is short (the next couple years). The time to act is now before our fishery gets beyond recovery. UCIDA had a great victory in the courts this July that resulted in the fishermen, processors and communities catching a lot of fish and making a lot more money, that otherwise would have just swam up the rivers. As it was, close to a million salmon over the biological escapement goal swam up anyway. Copper River Seafoods and their fishermen need to be commended for giving one cent a lb. for the **2010** season. Had we not had that money this summer to pay the legal bills to date, our lawyers would have not been able to pursue the court case. We would have been stuck in the three mile corridor, lost \$6,500,000 and put another 700,000 plus reds up the Kenai. Remember, we were and are still fighting the State. The only reason we won that case was because we had good lawyers that did their extensive research and used the law. The lawyers are not cheap, but they are effective. Unfortunately, the legal avenue is the only way to get results. UCIDA feels we have the federal law under Magnuson in our favor, but it is going to take some time, lots of money and our good lawyers to pursue this endeavor. The State will push back until they are stopped by federal law. This is why we need every processor, drift and set net fishermen's financial support. UCIDA cannot finance it alone and if we don't get the finances we can't continue the fight and all we have accomplished will be for nothing. As it is now, if we had more funds we could pursue more legal avenues, per depositions, etc. that I believe would expose a lot of the corruption in the current system and speed our case along at less overall expense. There is a lot to do and a lot to gain, but there is also a lot to lose if we stall and don't go full force. I am tired of playing their game for 30 years, of doing business as usual at the BOF and legislature. It doesn't and hasn't worked. Only the legal avenue will get results, end the constant allocation fight once and for all and re-establish biological management!

So everyone, please, for at least the next couple years, send your \$1,000 or at least \$500 in addition to your one cent a pound contribution to Fisherman's Legal Fund at the UCIDA office. If for some reason you don't want to contribute to the legal fund then contribute to UCIDA so we can continue to fight for our fisheries. It gets expensive to attend all the meetings. Consider your donation a price of doing business, its tax deductible, and is no different than buying nets or insurance but the returns will be many fold. Now is not the time to be complacent or a free loader. Everyone needs some skin in this game or we will be skinned even more by the BOF. Take nothing for granted. The powers to be are working constantly to destroy our fisheries. They must and **can** be stopped, but only with your help. It's your fishery and it is worth fighting for! A stable, predictable and viable fishery managed biologically for MSY is our goal.

Thank you, David Martin, UCIDA president

PS: To those fishermen and processors who have contributed your fair share **Thank You** for your support! If you are a fisherman who will not contribute your fair share financially then **do not complain** about future years with the predominate harvest being less than two million. If you are a drifter who won't contribute then **do not complain** about being allowed to **only** fish in the three mile corridor for the season, no four shackles either. If you are a set net fisherman who won't contribute then **do not complain** about your yearly three day fishery, even less if they need more kings in the river. Don't complain. You will still have that \$1000 you didn't donate!

PSS: Every drifter should be a member of UCIDA! If you are, Thank You! If you are not a member, please sign up and pay your dues. If you know someone who is not a member, please encourage them to join. Power is in numbers!

PSSS: Write or call Governor Sean Parnell and voice your concerns. The guides and lobbyist do!
PO Box 110001
Juneau, AK 99811
Phone: 907-465-3500
Fax: 465-3532
E-mail: seanparnell@alaska.gov

PSSSS: Governor Parnell **reappointed** Bill Brown to the BOF. Brown promotes Social Fisheries Management, doesn't believe in overescapement or MSY management, doesn't want to hear the science or use the data and has no problem allocating away from the commercial fisheries.

2011/2012 UCIDA Board of Directors

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UCIDA ~

"Actively serving the Upper Cook Inlet drift gillnet salmon fishermen since 1980 with proven results"

**The Vagabond Inn ~
"Where you never
meet a stranger"**



Dear Cook Inlet Fisherman;

Even if you did NOT participate in the fishery this year, you made money as a result of UCIDA's efforts. Cook Inlet Drift Permit values are up 20% or more from their pre-season values.

If you DID participate in the fishery this year, you almost certainly caught lots of fish in the "new expanded" corridor. You should realize that this expanded corridor would not have been available to you in 2011 were it not for the fact that UCIDA went to court on behalf of the fleet and won a decision that allowed us the expanded opportunity. The legal bill for this effort exceeded \$80,000. This amounts to a cost of about \$200 per active permit.

Ask yourself: was it worth \$200 for me to have the opportunity to fish in the expanded corridor this year?

Fact: All Cook Inlet Fishermen have been and will likely be on the losing end of Board of Fisheries rulemaking in the future. Our opponents now have firm control of the BOF and will certainly strive to further restrict commercial fishing.

Fact: There is potential for success if Cook Inlet Fishermen pursue further litigation. There is no other real alternative. This cannot be done unless you help out with a donation.

Fact: The fishery will be in the toilet if we stand by and do nothing

Fact: Only a small percentage of fishermen have contributed to the Legal Fund through the Penny a Pound program.

It is time for you to step up and do your part to preserve your investment and livelihood.

Please read the enclosed information about the "Penny a Pound" program. Then, figure out your total pounds for 2011 and give at least a penny a pound to the Legal Fund. This contribution will qualify for a tax deduction as it is being directed to a nonprofit organization.

Call the UCIDA office at 907 260 9436 and pay by credit card, or simply send in a check. One of our volunteers may call you soon to be sure you received the mailer and to answer any questions about the program.

Thank You in advance for your generosity! Don't delay, contribute TODAY!

The UCIDA Board of Directors

Alaska Salmon Alliance and the Penny a Pound program

Fishermen, fishing organizations and fish buyers/processors have together created the Alaska Salmon Alliance (ASA), a private, non-profit corporation. The Board of Directors currently has Norm Darch and Erik Huebsch representing the harvesters and Paul Dale and David Brindle representing the buyers/processors.

ASA (formerly known as CISBA, for Cook Inlet Salmon Buyers Association) was established last spring, just prior to fishing season. The fundamental concept is that processors will donate a penny a pound for the sockeye that they purchased in Cook Inlet. ASA also created and distributed the Harvester Participation Form to enable fishermen who wanted to contribute a penny a pound to have their processor withhold those funds and distribute them to ASA, Fishermen's Legal Fund, UCIDA or KPFA.

ASA will work to promote long term sustainability and be a source for accurate information about the salmon industry. One of the goals of ASA is to ensure that policy makers and resource managers understand the importance of scientifically based salmon management. This industry cannot remain viable in the "manage by best available politics" scheme that has been predominant here for the last decade or more.

Thank you for your support!

Penny a Pound for the Future of Cook Inlet Commercial Fishing

Over the past year, fishermen, fishing organizations and fish buyers/processors have come together to develop a reliable funding source for promotion, advocacy, education and, if necessary, legal action to protect our common interests in the seafood industry. Cook Inlet fish buyers/processors are contributing a penny per pound of sockeye purchased during the 2011 to a "Penny Fund" account which will be managed by a committee of fish buyers/processors and fishermen (Alaska Salmon Alliance). Fishermen need to match this contribution. Everyone must contribute to ensure the continued viability of our fishery.

I hereby authorize _____ (My Fish Buyer) to withhold one penny per pound of sockeye salmon that I harvested during the 2011 salmon season.

My contribution is to go to:
(check one - or check two to split your contribution)

Alaska Salmon Alliance (ASA)
(Funds to be used for lobbying, educational and legal purposes)

Fishermen's Legal Fund
(Funds to be used fully for legal purposes)

UCIDA
(Funds to be used for general operating expenses)

KPFA
(Funds to be used for general operating expenses)

Name

Address

Permit Number

Signature

Date

**** Please mail your completed form back to:**

**UCIDA
43961 K-Beach Rd, Ste. E
Soldotna, AK 99669**