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I would like to start off by saying “Thank you” for the opportunity to give comments on these important matters. I am a lifelong resident of Juneau, AK; my wife and I own a boat and power troll permit. We commercial power troll mainly in the summer season but also do our fair share of sport fishing. I have seen some of the ups and downs throughout my lifetime; with the chinook salmon populations around Juneau. I want to be able to teach my daughter how to catch king salmon when she is old enough. I am deeply concerned about the future of chinook salmon in Southeast Alaska with the current forecasts of chinook salmon (which I question, some of the data points and data collection methods) to return to the rivers of Southeast Alaska in 2018. I think there are numerous reasons/ factors as to why we are experiencing low returns of mature chinook as stated in Mr. Ed Jones presentation to the board on 1-15-17. I am all for conservation on wild Alaskan chinook stocks but managing with a sledgehammer (“Stock of Concern Designation”) is unwarranted in my opinion. I believe that leaving the Emergency Order tool is the back pocket of managers at ADF&G is the best tool because it allows the managers in their field of study to be surgical in the conservation efforts.

**Chilkat River:**

The Chilkat River, in my opinion needs to have a management plan that is equal to all user groups for all user groups (Commercial Troll, Sport Troll, Gillnet, and Subsistence). This past summer (2017) it was pretty one sided in how the management decisions were made; shutting down sport fishing (spring and summer) and not having an August Commercial Troll Chinook opener meanwhile the gillnet fleet had most of the summer to fish in Lynn Canal. Based on ADF&G’s numbers there were 1,231 mature chinook that made it to their spawning grounds; which is 519 fish shy of the escapement goal. In the Lynn Canal gillnet fishery, the gillnet fleet took 1150 chinook. Assuming most of those fish are headed to the Chilkat River; it would only take 45.1% of those fish to make it to the spawning grounds and the Chilkat River makes the lower end of escapement. We wouldn’t be in such dire straits when it comes to the Chilkat chinook and talking as serious about a “Stock of Concern” designation.

Chinook Stock	2018 Run Forecast	Avg Run (07-16)	2017 Escapement <sup>a</sup>	Escapement goal range	
				Lower	Upper
Situk	730	660	1,187	450	1,050
Chilkat	1,030	2,830	1,231	1,750	3,500
Taku	4,700	28,700	7,000	19,000	36,000
Stikine	6,900	24,550	10,000	14,000	28,000
Unuk	865	3,780	1,203	1,800	3,800
King Salmon <sup>b</sup>	n/a	n/a	85	120	240

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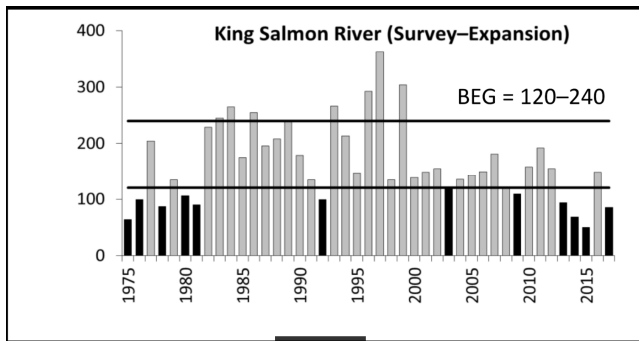
Lynn Canal Gillnet	18-Jun-2017	03-Oct-2017	Chinook	0.90	\$4.94	1,150
			Chum	3.40	\$0.78	1,163,136
			Coho	8.10	\$1.29	29,396
			Pink	4.30	\$0.27	64,686
			Sockeye	6.10	\$1.67	31,691

The fishermen and ADF&G know the main corridors for these fish returning to the Chilkat River. It is my opinion, while probably not a very popular one among others; is both sport and commercial fisheries (Lynn Canal Gillnet and Troll) in the spring between approx. April 1- June 15 need to be severely limited to shut down so that these mature salmon that have beat the odds are able to return to the stream and spawn. They need to be allowed every opportunity to get back to the Chilkat River until stocks return to sufficient escapements annually.

**King Salmon River:**

I think the King Salmon river being labeled as a “Stock of Concern” is the wrong decision in this situation. I don’t feel like there is adequate data supporting this sledgehammer approach to management. I question the data collection method for the King Salmon River since the weir was removed in 1992. The use of air craft to count fish from in not an accurate method in my opinion. There are too many negative effects to all chinook fisheries in the area to use old sampling methods from the 1983-1992 weir days. As stated in many presentations to the board by ADF&G Biologists “Environmental Conditions Change”. **Did the taking of Brood Stock change the stream dynamics? Is the 120-240 BEG still the right number? How do we know for sure that the peak survey count is still around middle of July? Are the Chinook not getting counted because they are intermingling with pinks, chum and coho?**

King Salmon River made escapement in 2005 (143 Chinook) and 2006 (150 Chinook). 12 year average makes low end of escapement at 137/138 chinook.



“Harvest of King Salmon River king salmon has never been quantified because no coded-wire tagging program has been established. Genetic stock identification estimates are not available because sample

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sizes are insufficient to provide accurate harvest estimates” (Chilkat River and King Salmon River King Salmon Stock Status and Action Plan, 2018).

“The department does not produce preseason forecasts for the other 6 indicator stocks in the region, **including the King Salmon River stock, due to a lack of sibling model information and harvest contributions.** However, the downward trend in king salmon production throughout SEAK is expected to continue through 2018” (Chilkat River and King Salmon River King Salmon Stock Status and Action Plan, 2018).

Based on ADF&G’s quotes above from the stock status and action plan, 2018; how can ADF&G be confident that this is the right move for the King Salmon River system? Especially since there isn’t a weir on the KSR anymore where each fish is counted! **When is ADF&G going to budget to study this river again properly?**

During the years when brood stock was being taken from the King Salmon River for Snettisham hatchery (poor returns of .29%) and then Little Port Walter in 1988; there was a weir on the river counting all the mature salmon between 1983-1992. The data was excellent in those years. As for the recent data, ADF&G questions their own data!

Year	Peak Survey Count of Chinook Salmon	Weir Count of Large Fish	Foot Count of Chinook Below Weir	Number of Fish Removed for Egg Take	Weir Count Minus Chinook Removed for Egg Take	Estimated Proportion of Escapement Observed During Survey	Peak Survey Divided by Average Proportion (0.675)	Estimated Escapement (large fish)
1971	94						139	139
1972	90						133	133
1973	211						313	313
1974	104						154	154
1975	42						62	62
1976	65						96	96
1977	134						199	199
1978	57						84	84
1979	88			17			130	113
1980	70						104	104
1981	101			11			150	139
1982	259			30			384	354
1983	183	252	30	37	215	0.851	271	245
1984	184	298	13	46	252	0.730	273	265
1985	105	194	10	29	165	0.636	156	175
1986	190	264	17	26	238	0.798	282	255
1987	128	207	20	31	176	0.727	190	196
1988	94	231	12	35	196	0.495	139	208
1989	133	249	29	38	211	0.630	197	240
1990	98	200	8	29	171	0.573	145	179
1991	91	146	8	20	126	0.722	135	134
1992	58	47	70	18	29	0.586	86	99
1993	175						259	259
1994	140						207	207
1995	97						144	144
1996	192						284	284
1997	238						353	353
Avg.	127	209	22	28	178	67.5%	188	190

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(KING SALMON RIVER WEIR OPERATIONS AND CHINOOK SALMON (*Oncorhynchus tshawytscha*)  
BROOD STOCK DEVELOPMENT AT SNETTISHAM HATCHERY, 1979- 1992)

In closing, I am against any “Stock of Concern” designations for either the King Salmon River or Chilkat River. I feel it is unwarranted, not enough data, questionable sampling methods and doesn’t accomplish the goal at hand to put more mature chinook salmon in the river. It handcuffs the area biologists too much! There isn’t certain language to remove these designations in timely enough manner. It is the sledgehammer management plan, not the scalpel!

I am against changing the dates of the start of the summer chinook season. **The summer troll season should remain the same and start on July 1<sup>st</sup> annually for the taking of 70% of the remaining chinook quota. Their needs to be language in the new management plan that states the remaining quota is to be taken in August!**

Chum and Coho fisheries should remain unchanged.

I am against the mark select fishery unless there is a mass marking program instituted in all hatcheries in Southeast Alaska and needs to go through the complete vetting of the Board of Fisheries process. If the fishery is to remain; there needs to be serious thought into a quota for each fisherman so they aren’t out sifting through chinook to find the few that are marked in my opinion.

**Proposals Supported:**

I support proposal 139.

I support proposal 150.

I support proposal 176.