



Ninilchik Traditional Council

P.O. Box 39070

Ninilchik, Alaska 99639

Phone: 907 567-3313 / Fax: 907 567-3308

E-mail: ntc@ninilchiktribe-nsn.gov

ninilchiktribe-nsn.gov

April 10, 2019

Mr. Gregory L. Siekaniec, Regional Director
U.S. Fish and Wildlife Service- Alaska Region
1011 E. Tudor Road MS 200
Anchorage, Alaska 99503

RE: Draft language in order to clarify the joint Temporary Special Action request from NTC and FWS to implement the Kenai River community gillnet fishery in 2019

Dear Mr. Siekaniec,

As you are aware, the joint Temporary Special Action request submitted by the Ninilchik Traditional Council (NTC) and U.S. Fish & Wildlife Service (FWS) asked the Federal Subsistence Board (Board) to immediately implement any changes to the Federal subsistence regulations related to the Kenai River community gillnet fishery that are made as part of Board action on the Cook Inlet Federal subsistence fisheries Final Rule. This temporary special action would expire upon publication of the revised fisheries regulations in the Federal Register.

As identified in the Office of Subsistence Management Staff Analysis of our joint Temporary Special Action request, language and conditions concerning harvest opportunities for Chinook Salmon from July 1-15 under consideration include:

Establish an early-run Chinook Salmon season for the community gillnet fishery July 1-15.

Establish an early-run Chinook Salmon household limit of 2 early-run Chinook Salmon per household and 1 additional for each household member.

Up to 50 early-run Chinook Salmon may be retained or released according to the following conditions:

- *Retention of early-run Chinook Salmon less than 46 inches or 55 inches and longer in length is permitted if the most current preseason forecast from the State of Alaska, Department of Fish and Game projects the in-river run to be within or*

Mr. Gregory L. Siekaniec
Regional Director
U.S. Fish and Wildlife Service – Alaska Region

April 10, 2019
Page 2

*above the Optimal Escapement Goal (OEG) for early-run Chinook Salmon;
otherwise live fish must be released.*

- *The community gillnet fishery will close until July 16 once 50 early-run Chinook Salmon have been retained or released*

The Niniilchik Traditional Council supports modification of the joint 2019 Temporary Special Action request to include language similar to our joint request in 2018 that takes into account considerable in-season in-river run assessment information for early-run Chinook Salmon in the Kenai River that will be available prior to the start of the community gillnet fishery on July 1. We support the following change in red text:

Retention of early-run Chinook Salmon less than 46 inches or 55 inches and longer in length is permitted if the most current preseason forecast from the State of Alaska, Department of Fish and Game projects the in-river run to be within or above the Optimal Escapement Goal (OEG) for early-run Chinook Salmon or the lower end of the OEG range is met by in-season in river run assessment; otherwise live fish must be released.

This modification would improve regulation clarity as to when the Kenai River community gillnet fishery is able to harvest Chinook Salmon and could reduce potential in-season emergency special actions requiring Board action.

The NTC also supports modifying the Temporary Special Action request so that it remains in effect through July 15 regardless of when any revised fishery regulations adopted by Board action are published in the Federal Register. This will allow the temporary regulations to remain in place through the entire window of opportunity to harvest early-run Chinook Salmon this year while a full proposal to modify the regulations can be considered during the next regulatory cycle.

Sincerely,



Ivan Z. Encelewski
NTC Executive Director

cc: Federal Subsistence Board, c/o Mr. Anthony Christianson, Chair
Mr. Jeffrey Anderson, Field Supervisor USFWS, Kenai Fish & Wildlife Conservation Office
Ms. Carol Damberg, Regional Subsistence Coordinator FWS, Alaska Region
Mr. Scott D. Ayers, Fishery Biologist, FWS, Office of Subsistence Management
Ms. Jennifer Hardin, Ph.D., Subsistence Policy Coordinator, FWS OSM
Mr. Richard G. Encelewski, NTC President/Chairman