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PC1

Submitted by: Greg Acord
Community of Residence: Wasilla

see below

Proposal 205: Support	Proposal 206: Support	Proposal 207: Support	Proposal 208: Support
Proposal 209: Support	Proposal 210: Support	Proposal 211: Oppose	Proposal 212: Support
Proposal 213: Support	Proposal 214: Support	Proposal 215: Oppose	Proposal 216: Support
Proposal 217: Support	Proposal 218: Support	Proposal 221: Support	Proposal 222: Support
Proposal 229: Support	Proposal 230: Support	Proposal 231: Support	Proposal 237: Support
Proposal 238: Support	Proposal 239: Support	Proposal 240: Support	Proposal 241: Support
Proposal 242: Support	Proposal 243: Support	Proposal 244: Support	Proposal 245: Support
Proposal 247: Support	Proposal 248: Support	Proposal 249: Support	

PC2

Submitted by: Dustin Slinker
Alaska Sport Fishing Association

Community of Residence: Anchorage, Alaska

ASA proposal requesting a 3 coho salmon bag limit for 3 Northern Cook Inlet Sport Fishery Locations:

252: Turnagain Arm

243: Knik Arm

221: Susitna River Drainage (primarily Unit 2). With recent downturns in Northern Cook Inlet coho salmon production, and increased commercial harvest percentages of harvestable surplus Northern coho salmon ADF&G may not see enough harvestable surplus coho salmon to return the sport fishery daily bag limit to 3 coho per angler without reductions in commercial coho harvest(s). We don't know about ADF&G positions on these proposals as it is down to the Feb. 8, 2024 public comment deadline, and ADF&G positions on Upper Cook Inlet fishery proposals have not been made public.

Much of the Northern Cook Inlet coho salmon harvest opportunity for sport and other inriver users has gone away, due to expanded commercial harvests. ASA therefore would support regulation reductions in commercial coho harvests within the Northern District as suggested in the following proposals: 212, 214, 213. Commercial regulations need to be less liberal to ensure adequate numbers of coho and other salmon are allowed to migrate inriver to provide a full season of reasonable opportunity as articulated in the Northern District Salmon Management Plan. Commercial regulations should be restrictive enough to provide for reasonable and conservative inriver harvest opportunities throughout the entire season, rather than be anchored to old regulation standards that appear to regularly reduce inriver harvest opportunities. Note: The saltwaters of Northern Cook Inlet are too silty to provide much real harvest opportunity for hook and line sport fisheries -- so adequate salmon must be allowed to migrate inriver to provide harvest opportunities for most Northern Cook Inlet users. The discussion points in these proposals address this issue and provide differing regulatory options for the board to consider.

While proposal 212 would be the most restrictive to the Northern District commercial fishery, it would still provide significant salmon harvest opportunity with a 200 foot gillnet, twice a week, for the approximately 100

commercial permit holders who have registered to fish Northern District waters in recent years. 212 should, also, likely provide much more reasonable salmon harvest opportunities, throughout the entire season, with much less chance of inseason restrictions or closures -- for the many thousands of people living around Northern Cook Inlet who do not own commercial permits. With more salmon allowed to migrate into Northern Cook Inlet streams all users could better share more consistent fisheries, whether ASA's proposals to increase coho salmon bag limits were adopted by the board -- or not.

We support proposal 137, and the concept of one statute mile commercial closed waters around the saltwater terminus areas of the Susitna River and Little Susitna River -- two of the most important rivers providing salmon harvest opportunities for large numbers of both resident and nonresident users in Northern Cook Inlet. If the board were to choose not to adopt proposal 137, then we support Proposal 210 as a means of more reasonably sharing Little Susitna River salmon harvest opportunities amongst the large number of users of this resource.

Although wild king salmon populations in Northern Cook Inlet may take years, or even decades, to recover, we support Proposals 207, 208, and 43 to help facilitate that recovery, and to provide more reasonable sharing of harvestable surplus Northern Cook Inlet king salmon, when and if, that recovery occurs.

Proposal 43: Support	Proposal 137: Support	Proposal 207: Support	Proposal 208: Support
Proposal 210: Support	Proposal 212: Support	Proposal 213: Support	Proposal 214: Support
Proposal 221: Support	Proposal 243: Support	Proposal 252: Support	

ALASKA WILDLIFE ALLIANCE

February 8, 2024

TO: Alaska Board of Fisheries
Upper Cook Inlet Finfish Meeting 2024

RE: Support for Proposal #216, with detailed justification, and an Amended Proposal #217

We appreciate the opportunity to comment on behalf of the Alaska Wildlife Alliance, its members, and supporters, and to provide our support for the following proposals under consideration by the Board of Fisheries during your 2024 meeting of Upper Cook Inlet Finfish. While we explicitly support the two proposals listed below, we only include detailed justification explaining our support for Proposal #216.

- Support proposal #216 as written to reduce the commercial smelt guideline harvest level in Upper Cook from 200 tons to 100 tons (see additional comments below)
- Support proposal #217 to repeal the Cook Inlet Smelt Fishery Management Plan with an amendment to clarify it only applies to the commercial fishery

SUPPORT FOR PROPOSAL 216

Reduce the commercial smelt guideline harvest level in Upper Cook Inlet from 200 tons to 100 tons

The Alaska Wildlife Alliance is a nonprofit organization formed by Alaskans in 1978, to ensure Alaskans will be able to enjoy our wildlife for generations to come. Since our inception, we have been committed to advocating for management practices grounded in science and centered around overall ecosystem health. As such, our comments below supporting proposal #216, which would reduce the commercial guideline harvest level (GHL) back down to 100 tons and still allow existing permit holders an opportunity to fish, focus on the following points:

1. **The eulachon population spawning in the Susitna River has little assessment data, yet the GHL has quadrupled from 50 tons in 1999 to a current arbitrary limit of 200 tons.**
   - *There have only been 3 studies looking at eulachon in the Susitna River in the past 45 years, one of which did not look at abundance, and the most recent two conducted in 2013 and 2016 were not comparable due to different methodologies.*
   - *In the absence of quantitative data on the eulachon population, doubling the GHL to 200 tons in 2017 was arbitrary, and for multiple reasons, it is reasonable to revert back to the prior 100-tons limit.*

2. **Eulachon play a critical ecosystem role in Cook Inlet, especially to endangered Cook Inlet beluga whales, and multiple management plans and agency leaders, as well as the Board of Fisheries in previous years, have emphasized the importance of eulachon to other aspects of the ecosystem.**
   - *Eulachon are an important forage base for many species in both freshwater and marine waters, including endangered Cook Inlet beluga whales.*
   - *100 tons (200,000 pounds) of eulachon is significant to the Cook Inlet beluga whale population, and is equivalent to the amount of fish the entire population consumes in 11-16 days.*
   - *Multiple natural resource management plans and government agency leaders highlight eulachon*

as a critical ecosystem component, and indicate eulachons' importance to Cook Inlet beluga whales.

1. **The eulachon population spawning in the Susitna River has little assessment data, yet the GHL has quadrupled from 50 tons in 1999 to a current arbitrary limit of 200 tons.**

- *There have only been 3 studies looking at eulachon in the Susitna River in the past 45 years, one of which did not look at abundance, and the most recent two conducted in 2013 and 2016 were not comparable due to different methodologies.*

Fisheries management, including in Alaska, has an extensive track record of overharvesting resources that were perceived as so abundant that they could not be overfished. However, many stocks have subsequently collapsed. Climate change has altered previous ecosystem productivity patterns and linkages to amplify these collapses. Eulachon typically live 3-5 years and likely exhibit broad population swings based on spawning conditions, larval rearing conditions, and the marine environment. Eulachon population estimates in nearby waters of Lower Cook Inlet and the Northern Gulf of Alaska have declined dramatically in recent years. But no updated stock abundance estimates are available for Upper Cook Inlet (UCI) eulachon populations.

Despite the relatively long fishery duration, dating back to 1978, there have been only three studies in those 45 years assessing the eulachon population in the Susitna River, where the commercial harvest occurs:

- a 1983-1984 study as part of the Susitna-Watana Hydroelectric Project's dam studies sampled size, sex, and age data and collected CPUE by gillnet to assess run timing, but made no abundance estimates;
- a 2013 Susitna-Watana Hydroelectric Project's dam study used hydroacoustics (sonar) to develop an index of abundance and run timing; and
- a 2016 ADF&G study to estimate spawning abundance.

The 2016 ADF&G study only provided an indirect estimate of eulachon escapement by counting eulachon larvae moving downstream after being spawned and extrapolating from fecundity of adult eulachon migrating upstream[1]. This study was advertised to the Board during the 2017 meeting as being a 3-year study with results available prior to the 2019 smelt fishery season, however, after the Board increased the eulachon commercial GHL to 200 tons in 2017, the subsequent two years of the quantitative assessment of eulachon returning to the Susitna River were cancelled. The 200-ton commercial harvest cap has remained since 2017 without additional assessment of the eulachon population.

Thus, the GHL has quadrupled (50 tons to 200 tons) within a 25-year timespan (see Table 1) with essentially only one population estimate available (since the results from the 2013 and 2016 studies are

[1] Willette, T. M., and R. D. DeCino. 2023. Eulachon spawning biomass in the Susitna River, 2016. Alaska Department of Fish and Game, Fishery Data Series No. 23-16, Anchorage.

not comparable), and with no assessment of changes in the eulachon population over time. Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and age, sex, length (ASL) data are only opportunistically collected from the commercial harvest.[2]

- *In the absence of quantitative data on the eulachon population, doubling the GHL to 200 tons in 2017 was arbitrary, and for multiple reasons, it is reasonable to revert back to the prior 100-tons limit.*

Eulachon are an anadromous species, that spend most of their short lives in the marine environment, before returning to rivers in the spring to spawn and die. In UCI, commercial harvest of eulachon during the spring migration occurs in the vicinity of the Susitna River.

- Records of commercial harvests date back to 1978, with no harvest limit set until 1998, when ADF&G arbitrarily chose 50-tons as the GHL, despite the greatest harvest annually to that point being 9.3 tons (see Table 1). That year, the commercial harvest of eulachon drastically increased and met that 50-ton limit.
- The commercial fishery was closed by the Board in 2000 and stayed closed through 2004.
- In 2005, the commercial fishery reopened with a doubling of the prior GHL to an arbitrary 100-ton harvest limit. The intent at that time was that the harvest limit stay at 100 tons until an assessment of stock strength could be made.
- Based on the 2016 ADF&G study, for which the two follow-up years of study were cancelled, and a 2016 proposal, the Board increased the GHL to 200 tons (400,000 pounds) in 2017.
- **The GHL has quadrupled from 50 tons to 200 tons over the past 25 years with essentially one assessment of the population abundance and no assessments of how the population is changing over time, making the current 200-tons GHL arbitrary.**

In ADF&G's official comments to the 2016 proposal #143 to double the GHL from 100 tons to 200 tons, they made it clear that they provided their neutral recommendation based on qualitative, subjective, anecdotal reports in addition to self reports: "The department considers the current cap of 100 tons to be sustainable based on performance of the fishery and reports of large numbers of smelt migrating up the Susitna River."[3] They used the same justification of using subjective data in their comments to the 2023 proposal #216, but also explicitly stated "The department does not quantitatively assess smelt returning to UCI."[4] During recent Advisory Committee meetings, it was made clear ADF&G has no plans to conduct any UCI eulachon studies any time in the near future. They further stated in their current comments that there are no biological concerns, however, they have no scientific data to support that statement because they did not conduct the second or third year of the 3-year abundance study. Given documented declines in LCI and Gulf of Alaska eulachon in recent years, coupled with known environmental changes since 2016 and the short lifespan of eulachon, a

[2] B. Bechtol, retired ADF&G Commercial Fishery Biologist, pers. comm., February 2024.
[3] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[4] ADF&G's comments on Upper Cook Inlet Finfish proposals considered in 2024 are available under the "Department Comments" section at https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=02-23-2024&meeting=anchorage

precautionary approach to managing this fishery for the long-term is to return the GHL to the prior 100-tons limit until rigorous studies can be conducted to provide reliable data upon which to know if the current population can sustainably support a 200-ton commercial harvest limit. Management decisions should not be based on a single year's study which was only able to *indirectly* estimate eulachon abundance.

When examining the commercial eulachon harvest data (see Table 1), there are several things of note which suggest the reasonableness of a 100-ton harvest limit:

- the average harvest of all years with a harvest since 1978 was only 100.8 tons;
- there is a long-term history of the limit being 100 tons (2005-2016) with that limit only being slightly exceeded in two of those years, even with up to 11 permit holders; and
- the current harvest limit, which was arbitrarily doubled in 2017, has been exceeded twice (in 2020 and 2021), after which the harvests notably decreased in subsequent years (2022 harvest decreased by almost 55 tons and the 2023 harvest decreased further by almost 79 tons).

Given the documented declines of eulachon in Lower Cook Inlet and the Gulf of Alaksa, as well as concurrent declines of other fish species, it is reasonable to conclude Upper Cook Inlet eulachon have also declined. One possible conclusion is that the recent decline in harvest of eulachon in the Susitna River the past two years is a result of both the overall eulachon population declining, coupled with the highest levels of commercial harvest ever recorded occurring in 2018-2021, suggesting the 200-ton harvest limit is unsustainable. Since eulachon only live 3-5 years, it makes sense that there was insufficient escapement in the four consecutive years the harvest was close to, or exceeded, 200 tons.

The 2016 proposal asking for the doubling of the harvest limit from 100 tons to 200 tons argued an increase was needed in part because "Having such a low quota causes an unnecessary race for fish by the participants in this fishery, and causes managers to have to be unduly burdened with very close monitoring of the catch which can exceed the quota in just a few short days."[5] Ironically, that same argument still applies despite the limit being increased to 200 tons, as evidenced by the elevated harvest limit being exceeded in both 2020 (211.8 tons) and 2021 (222.4 tons).

2. Eulachon play a critical ecosystem role in Cook Inlet, especially to endangered Cook Inlet beluga whales, and multiple management plans and agency leaders, as well as the Board of Fisheries in previous years, have emphasized the importance of eulachon to other aspects of the ecosystem.

➢ *Eulachon are an important forage base for many species in both freshwater and marine waters, including endangered Cook Inlet beluga whales.*

Eulachon primarily feed on plankton, euphausiids, mysids, and amphipods. Serving as an oil-rich prey item (15-20% oil content), eulachon are consumed by a broad range of marine mammals, birds, and

[5] The text of proposal 143 considered in the 2017 BOF meeting can be found at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/proposals/143.pdf

fish.[6] In Cook Inlet, these predators primarily include:

- marine mammals such as endangered Cook Inlet beluga whales, harbor seals, harbor porpoise, and to a lesser degree humpback whales, killer whales, and Steller sea lions;
- terrestrial mammals including river otters and bears;
- birds preying on live and dead eulachon include gulls, terns, ducks, bald eagles, shorebirds, corvids, and other birds; and
- a wide variety of fish which prey on different eulachon life stages in both fresh and salt water, such as all five Pacific salmon species, Dolly Varden, spiny dogfish, walleye pollock, Pacific cod, Pacific herring, Pacific halibut, sablefish, rockfish, Pacific sand lance, three-spine stickleback, steelhead, and many others.

The Cook Inlet beluga whale population, which resides in Cook Inlet year-round, has experienced a significant decline over the same period as eulachon have been commercially harvested in the Susitna River region (see Figure 1). In 1979, there were approximately 1,300 beluga whales, but the population has crashed significantly and has been hovering at around 300 whales for the past several years; that's a loss of around 1,000 individuals in under four decades. Because of this decline, and the lack of recovery of this whale population, they were listed as an "endangered species" in 2008[7], and critical habitat, which includes but is not limited to all of UCI north of the forelands, was designated in 2011[8]. NOAA Fisheries has explicitly identified eulachon as a critical prey species for the endangered Cook Inlet beluga whales, particularly in late spring/early summer when the whales have lost substantial weight after surviving a winter with little food[9]. Cook Inlet beluga whales start to rebuild their energy reserves by spring feeding on eulachon, followed by king and coho salmon during the summer. But declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females who may not have sufficient energy reserves to wait until the salmon run. NOAA Fisheries has identified several threats to these whales, including a "reduction in prey"[10]. Along with the Cook Inlet beluga population's declining numbers, recent research has documented these belugas are reproducing slower than their counterparts in other areas, and that if sufficient food was available, they would be able to better withstand the other threats they face and potentially increase their reproductive rates to those displayed by other beluga whale populations.[11,12]

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[6] Gustafson, R.G., M.J. Ford, D. Teel, and J.S. Drake. 2010. Status review of eulachon (*Thaleichthys pacificus*) in Washington, Oregon, and California. U.S. Dept. Commer., NOAA Tech. Memo. NMFS-NWFSC-105, 360 p.

[7] 73 FR 62919

[8] 76 FR 20180

[9] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

[10] Id.

[11] McHuron, E.A., M. Castellote, G.K. Himes Boor, K.E.W. Shelden, A.J. Warlick, T.L. McGuire, P.R. Wade, K.T. Goetz. 2023. Modeling the impacts of a changing and disturbed environment on an endangered beluga whale population, *Ecological Modelling*, 483: 110417.

[12] Norman, S.A., R.C. Hobbs, L.A. Beckett, S.J. Trumble, and W.A. Smith. 2020. Relationship between per capita births of Cook Inlet belugas and summer salmon runs: age-structured population modeling. *Ecosphere* 11(1): e02955.

- *100 tons (200,000 pounds) of eulachon is significant to the Cook Inlet beluga whale population, and is equivalent to the amount of fish the entire population consumes in 11-16 days.*

In their comments to the 2016 proposal #143, ADF&G stated "the amount of smelt needed by beluga whales is unknown."[13] However, studies on belugas in captivity, for whom smelt are a primary food source, suggest belugas need to consume 2.5-3% of their body weight each day; that's roughly between 40-60 pounds a day of fish per whale[14]. Noting that the entire Cook Inlet beluga whale population can be found in the vicinity of the Susitna River in late spring/summer[15], a very simple calculation can provide some guidance on the issue ADF&G claimed is unknown. Assuming approximately 300 beluga whales remain in Cook Inlet, that would equate to this population needing between 12,000 and 18,000 pounds of fish a day. When the eulachon are running, they are the primary food source for belugas, thus it is reasonable to conclude that all 12,000-18,000 pounds consumed a day are eulachon. Studies on other toothed whales indicate that females who are nursing young calves have to increase their daily consumption between 32-63% to offset milk production[16], so 12,000-18,000 pounds a day of fish may be an underestimate for wild Cook Inlet beluga whales when factoring in nursing females and the extra energy wild animals expend over their counterparts in captivity. In their prior comments, ADF&G also stated they had no information about "how a removal of an additional 100 tons of smelt annually would affect populations of smelt predators in UCI."[17] However, continuing the simple calculation demonstrates that removing an additional 100 tons (200,000 pounds) of eulachon from the Susitna River region is equivalent to removing food from the entire beluga population for 11-16 days. Furthermore, the 2016 proposal #143 requesting to double the GHL stated "We have shown that a single person may catch 35,000 fish (5,000 lbs) per hour with a very small (22 inch) hand held dipnet."[18] This means that **in only 3 hours, a single person can remove enough eulachon from the Susitna River to feed the entire Cook Inlet beluga whale population for one day.**

- *Multiple natural resource management plans and government agency leaders highlight eulachon as a critical ecosystem component, and indicate eulachons' importance to Cook Inlet beluga whales.*

The *Forage Fish Management Plan* (5 AAC 39.212) recognizes the importance of forage fish, including eulachon, as an ecosystem component critical to higher trophic level species. The Board of Fisheries established a Forage Fish policy intended to consider the ecosystem role played by forage species such as eulachon**.** Previous Board of Fisheries discussions raised concerns about how eulachon harvests may impact survival and rebuilding of endangered Cook Inlet beluga whales. But with a Board focus on

[13] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[14] Values obtained from https://seaworld.org/animals/all-about/beluga-whales/diet/#, which is the only aquarium who has a Cook Inlet beluga whale in captivity.
[15] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.
[16] Lockyer C. 1981. Estimates of growth and energy budget for the sperm whales, *Physeter catodon* . FAO Fishery Service 5:489–504.
[17] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[18] The text of proposal 143 considered in the 2017 BOF meeting can be found at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/proposals/143.pdf

salmon returns, there has been little attention, or recognition, of ecosystem components such as eulachon.

NOAA Fisheries' 2016 *Recovery Plan for the Cook Inlet Beluga Whale*[19] calls out eulachon as a key prey item and identified "reduction in prey" as a known threat to the belugas' survival. Furthermore, the Recovery Plan specifically includes an action item indicating ADF&G should "Ensure fisheries management (e.g., escapement goals for CI beluga prey species) adequately accommodates CI beluga prey requirements, and if necessary, expand the number of species with escapement goals."

On February 2, 2024, at a public meeting of the Cook Inlet Beluga Whale Recovery Implementation Taskforce, ADF&G's Commissioner Doug Vincent-Lang and Marine Mammal Program Coordinator Dr. Lori Polasek, both highlighted that ADF&G is committed to taking actions to ensure Cook Inlet beluga whales have enough food. Commissioner Vincent-Lang commented that the State is restricting dip net and drift net fishing, and Dr. Polasek indicated she had just learned about proposal #216 days prior and would be sending comments to the fishery biologist emphasizing the importance of eulachon to Cook Inlet beluga whales, especially in the Susitna River region. However, given the extensive review and approval process ADF&G's formal comments must go through prior to submission to the Board, it is unlikely Dr. Polasek's comments were received in time to be incorporated into ADF&G's formally submitted comments to the Board.

In summary, **we urge you to pass Proposal #216 because it follows the precautionary principle to ensure the fishery's long-term sustainability while also promoting overall ecosystem health.** We support changing the GHL back to the 100 tons level until there are rigorous scientific data supporting that an increase is sustainable for both the fishery and ecosystem because:

- 100 tons maintains an opportunity for a commercial fishery of eulachon in Upper Cook Inlet;
- 100 tons was sustainable as it was the harvest limit from 2006 through 2016, and rarely exceeded, even with up to 11 permit holders;
- 100 tons is the average harvest amount taken via the commercial fishery for all years with a harvest between 1978 and 2023;
- 100 tons was the amount which ADF&G stated in their comments on the 2016 proposal #143[20] was sustainable;
- 100 tons is aligned with an ecosystem-level management strategy, as directed by various management plans; and
- adding back 100 tons of eulachon to the UCI ecosystem is the equivalent of adding back in enough food to feed the entire endangered Cook Inlet beluga whale population for 11-16 days, at a time when they are desperately in need of this early season, oil-rich prey after losing significant weight overwinter, especially for females nursing calves.

[19] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

[20] ADF&G's comments on 2016 proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf

We appreciate the opportunity to share our comments, and your time reading and considering our input. We encourage you to reach out to us directly in advance of the Board of Fisheries meeting should you have any questions regarding our comment.

Thank you,

Mandy Migura
Deputy Director and Marine Program Coordinator
[redacted]

See below for Table 1 and Figure 1

ALASKA WILDLIFE ALLIANCE

Table 1: Commercial Eulachon Harvest and Effort in Upper Cook Inlet, 1978–2023.

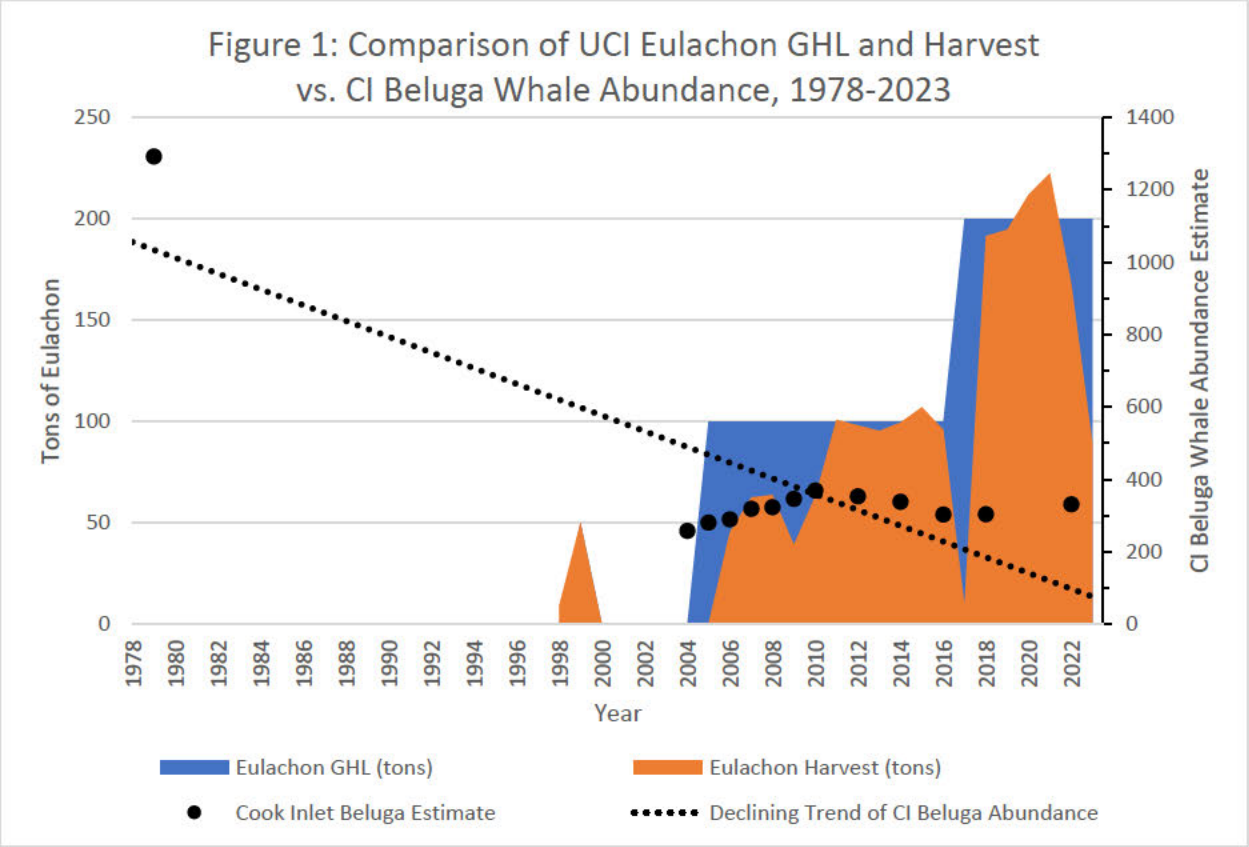
Year	GHL (tons)	Harvest		Permits
		Pounds	Tons	
1978	NA	300	0.2	NA
1980	NA	4,000	2.0	NA
1998	NA	18,610	9.3	2
1999	50	100,000	50.0	NA
2000	FISHERY CLOSED			
2001	FISHERY CLOSED			
2002	FISHERY CLOSED			
2003	FISHERY CLOSED			
2004	FISHERY CLOSED			
2005	100	0	0	8
2006	100	90,783	45.4	8
2007	100	125,044	62.5	11
2008	100	127,365	63.7	6
2009	100	78,258	39.1	6
2010	100	126,135	63.1	3
2011	100	201,570	100.8	5
2012	100	195,910	98.0	4
2013	100	190,830	95.4	4
2014	100	198,814	99.4	4
2015	100	213,934	107.0	4
2016	100	191,536	95.8	4
2017	200	18,685	9.3	< 3
2018	200	382,967	191.5	4
2019	200	389,473	194.6	6
2020	200	423,613	211.8	7
2021	200	444,838	222.4	7
2022	200	335,494	167.7	7
2023	200	177,588	88.8	5
Average		**201,572**	**100.8**	**5.2**
St.Dev.		129,246	64.6	2.3

NA is not available. The dashed line delineates the sporadic reports pre-1998; after the line data are presented annually. The boxes indicate years eulachon abundance studies in the Susitna River were conducted, noting methodologies differed. Sources: Shields 2005[21], 2006[22]; Lipka and Stumpf 2024[23]; B. Bechtol, retired ADF&G Commercial Fisheries/Bechtol Research, pers. comm.

[21] Shields, P. 2005. Upper Cook Inlet commercial herring and smelt fisheries through 2004. Alaska Department of Fish and Game, Special Publication No. 05-14, Anchorage.

[22] Shields, P. 2006. Upper Cook Inlet commercial fisheries annual management report, 2005. Alaska Department of Fish and Game, Fish28888ery Management Report No. 06-42, Anchorage.

[23] Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.



Source data: Eulachon GHL and Harvest pulled from Table 1 (Shields 2005[24], 2006[25]; Lipka and Stumpf 2024[26]; B. Bechtol, retired ADF&G Commercial Fisheries/Bechtol Research, pers. comm.; Cook Inlet beluga whale abundance data obtained from NMFS 2016[27] and Goetz et al. 2023.[28]

[24] Shields, P. 2005. Upper Cook Inlet commercial herring and smelt fisheries through 2004. Alaska Department of Fish and Game, Special Publication No. 05-14, Anchorage.
[25] Shields, P. 2006. Upper Cook Inlet commercial fisheries annual management report, 2005. Alaska Department of Fish and Game, Fish28888ery Management Report No. 06-42, Anchorage.
[26] Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.
[27] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.
[28] Goetz, K. T., Shelden, K. E. W., Sims, C. L., Waite, J. M., and Wade, P. R. 2023. Abundance of belugas (*Delphinapterus leucas*) in Cook Inlet, Alaska, June 2021 and June 2022. AFSC Processed Rep. 2023-03, 47 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

To: Alaska Board of Fisheries January 25, 2024
UCI Meeting February 23 – March 6, 2024

From: Alaska's PNP Salmon Hatchery Operators

Re: Proposal 43 5 AAC 40.820 Basic Management Plans & Response to Synthesis Research

Dear Chair Wood and Board Members:

At the Alaska Hatchery committee meeting October 14, 2023, RC 002 and RC 003 Ruggerone and McMillan synthesis papers were submitted to the Board, but there was little chance for discussion and context. We appreciate the opportunity to comment here. These are lengthy synthesis papers and therefore they deserve a proper substantive response. Nonetheless, we intend to maintain concision and clarity. In this paper we will present informative studies/research on the topics of pink salmon abundance, salmon enhancement, and mechanisms for salmon declines regionally while recognizing there are also significant increases in salmon productivity in other regions of the North Pacific Ocean.

I. Introduction

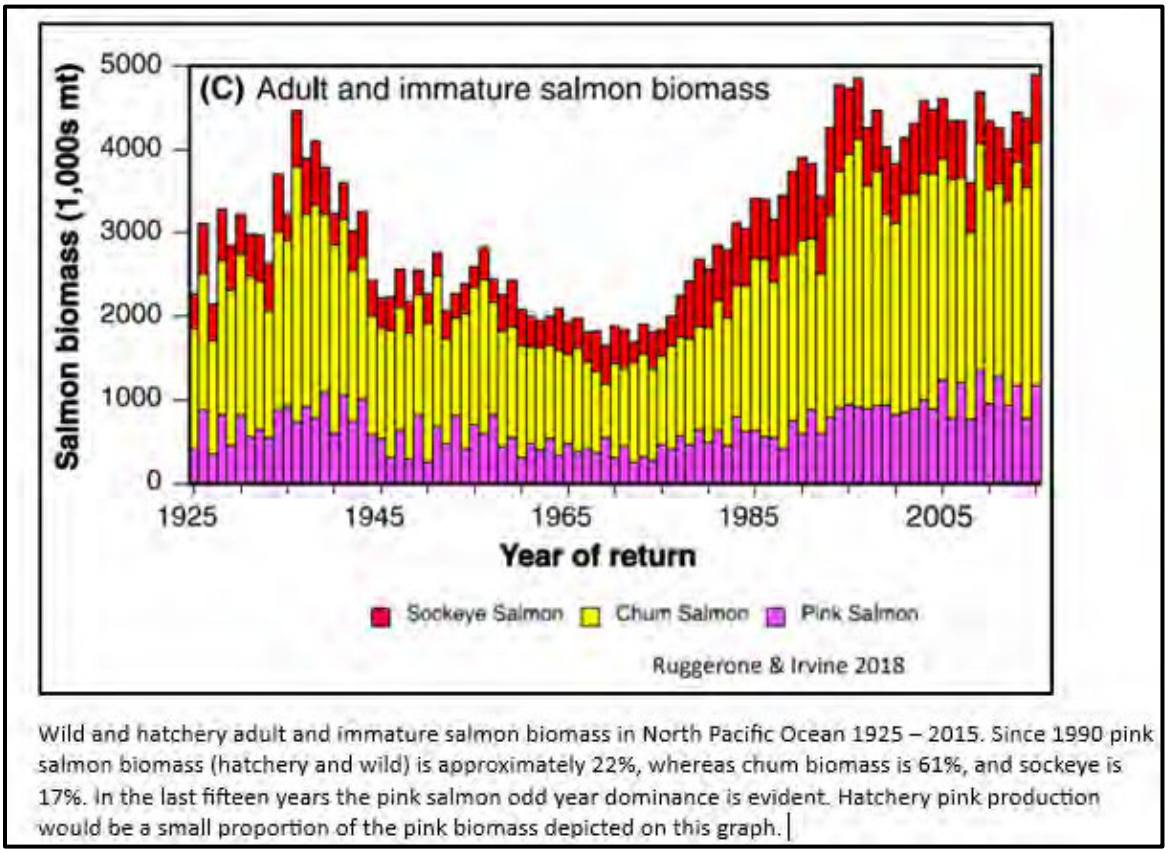
The two research papers for consideration are *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems*, Ruggerone et.al., and *Global Synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*, McMillan et.al. These papers are dense with historical data and hypothesize negative correlations that suggest pink salmon impacts on other species, and specifically hatchery produced salmon impacts on wild salmonids, mammals, avians, and other life forms. However, they do not demonstrate a mechanistic linkage. We will show contrary research that reveals mechanistic linkages for increases in Alaska salmon productivity (both wild and enhanced) ushered in by the post 1977 regime shift (Pacific Decadal Oscillation or PDO), as well as other research that demonstrates small effects of ocean rearing juvenile salmon to regional zooplankton densities.

The debate about ocean carrying capacity has been ongoing in Alaska since the inception of the Ocean Ranching program in the mid-1970s. We do not contend that hatcheries have no effects. There are potentially negative ones, relative reproductive success (RRS) for example. However, there are benefits such as Pacific Salmon Treaty offsets and more king salmon for sport fisheries as well as reducing harvest impacts on natural stocks by all user groups. The best counterargument to the Ruggerone and McMillan papers is the Wertheimer et.al. document presented to the board of fisheries in 2018.[1] We will separately resubmit and update: *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate* with an on-time public comment. However, the most salient points that challenge the Ruggerone and McMillan papers will be presented in this document, including pertinent references to the Wertheimer et.al. paper. Prior to discussing research, we feel it is critical to establish baseline information and nomenclature to lend context to the discussion of Alaska hatchery production of pink and chum salmon which is often missing in scientific journals and opinion pieces.

Abundance vs Biomass

Definitions are necessary, to sort out the "apples versus the oranges" so we can keep the differences straight. There is understandable confusion with the terms abundance or numbers of salmon in the ocean versus biomass of salmon in the ocean (see graph below & graph page 3). This is particularly true when ascertaining which is the dominant driver or drivers of top-down effects. Pink salmon represent the greatest number or abundance of salmonids in the ocean in any given year, but not in biomass. Pink salmon have the smallest body size (two to four pounds) and migrate to the ocean in one year and return to their natal stream the following year, whereas chum (five to fourteen pounds) and sockeye (four to eight pounds) are far larger and spend two to four years in the ocean prior to returning to their natal stream.

[1] Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.



Wild and hatchery adult and immature salmon biomass in North Pacific Ocean 1925 – 2015. Since 1990 pink salmon biomass (hatchery and wild) is approximately 22%, whereas chum biomass is 61%, and sockeye is 17%. In the last fifteen years the pink salmon odd year dominance is evident. Hatchery pink production would be a small proportion of the pink biomass depicted on this graph.

Therefore, pink salmon peak in abundance in the spring as fry. However, as biomass chum and sockeye salmon surpass pink biomass in any single year. Mortality is a significant factor in the first thirty to forty-five days of ocean life for pink and chum when mortality on average is between 50% to 90%.[2]

Wild Pink vs Hatchery Pinks

The vast majority of pink salmon in the North Pacific and Bering Sea are from wild populations, estimated at approximately 25 billion fry annually throughout the Pacific Rim for all salmonids. An additional 5 billion fry are hatchery pink and chum fry from Russia, Japan, and Alaska. The hatchery proportion in terms of abundance of **all pinks is about 15%**.[3] **The biomass of hatchery pinks** is an even smaller proportion, perhaps **less than 5%** (refer to the biomass graph above). These hatchery proportions, whether in abundance or biomass, significantly differ from

[2] Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia.

[3] Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.

depictions elsewhere. Aggregate samples for abundance of juvenile pinks from the 2022 International Year of the Salmon research vessels align with the proportions above, 8.2% for Alaska hatchery pink salmon (although data is hampered by small sample size N=58). Chum salmon sample size was more robust (N=536), showing a hatchery portion of 15.3% for Pacific Rim countries while Alaska hatchery percentage is 5.4%, Japan 4.7%, Canada 0.6% and Russia 0.6%.[4]

Based on data from the Ruggerone paper here is the actual data that gets misquoted which we delineated in the High Ocean Biomass paper:

> Approximately 39% of all North Pacific pink salmon, 22% of chum salmon, and 69% of sockeye salmon are produced in Alaska (combining wild and hatchery) production while most of the remaining quantities are produced by Japan and Russia. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin (all countries). In particular, Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea possess salmon abundance that is predominantly from hatchery production. During 1990–2015, hatchery salmon (Japan, Korea, Russia, and Alaska) constituted approximately 40% of the total biomass of adult and immature salmon in the ocean.

The misquote arises from the 40% value. It is correct to say that “of the total wild and hatchery adult and immature salmon biomass in the North Pacific, 40% is hatchery origin”. However, it is **incorrect** to state that 40% of pink, or pink and chum **are Alaska's hatchery-originated** salmon. Alaska’s hatchery component of that 40% is closer to 20%, with Japan and Russia contributing the remainder. Specifically, Japan produces 70% of the hatchery chum, while Alaska almost equals it with pink salmon hatchery production at 68% of North Pacific pink releases. These proportions seem large but to reiterate they are percentages of just the hatchery component which is about 15% of the total abundance of wild and hatchery salmonids.

[4] Unpublished data from IYS. Source NOAA fisheries and ADF&G 2024.

Hatchery Production by Country of Origin

Of the five billion hatchery salmon released into the Pacific each year, Russia (pink & chum) and Japan (chum) release about three billion salmon fry while Alaska releases approximately two billion fry (pink & chum). The annual assessment by the North Pacific Anadromous Fish Commission (NPAFC) shows that production has been nearly constant since 1990.

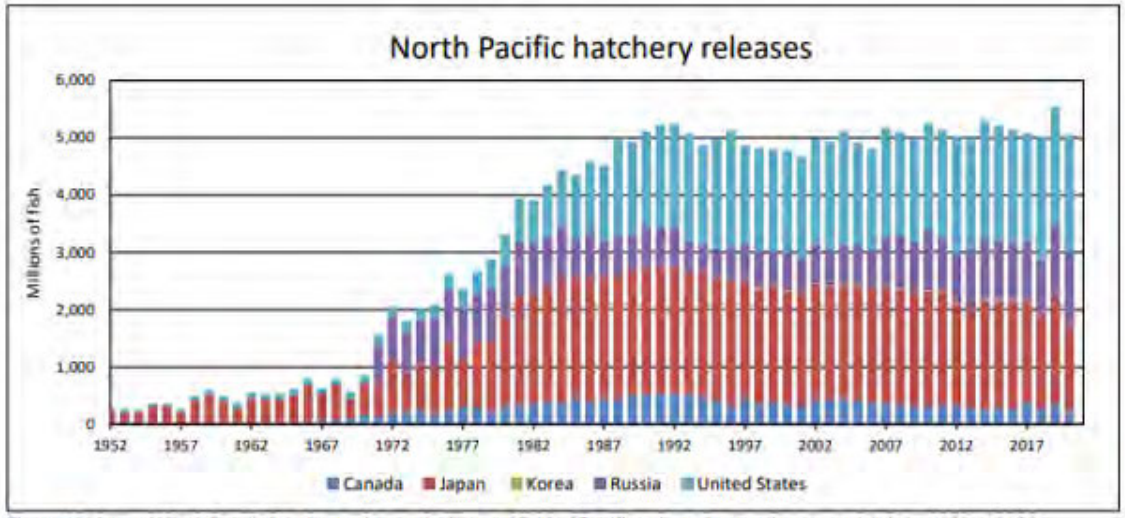


Figure 10. Annual North Pacific hatchery releases (millions of fish) of Pacific salmon by member countries from 1952 to 2020.
* Canadian estimates include both hatchery releases and spawning channel production.

Hatchery production of Pacific nations Canada, Japan, Korea, Russia, and U.S. (primarily Alaska) has been stable since about 1990. Japanese production of chum went up in 2019 but was back down in 2020. Five billion, hatchery pink and chum fry, are released annually. An estimated 25 billion wild fry are produced from Pacific Rim wild systems, or approximately 83% of total salmonid abundance. Graph from North Pacific Anadromous Fish Commission annual report 2021

According to the North Pacific Anadromous Fish Commission, hatchery production varies by species, as illustrated in the figure below. Sockeye hatchery production is primarily concentrated in PWS and Canada, while the greatest production of chum salmon is in Japan (two billion) and Southeast Alaska. The highest level of pink salmon production is found in PWS and Russia.[5]

[5] https://www.npafc.org/

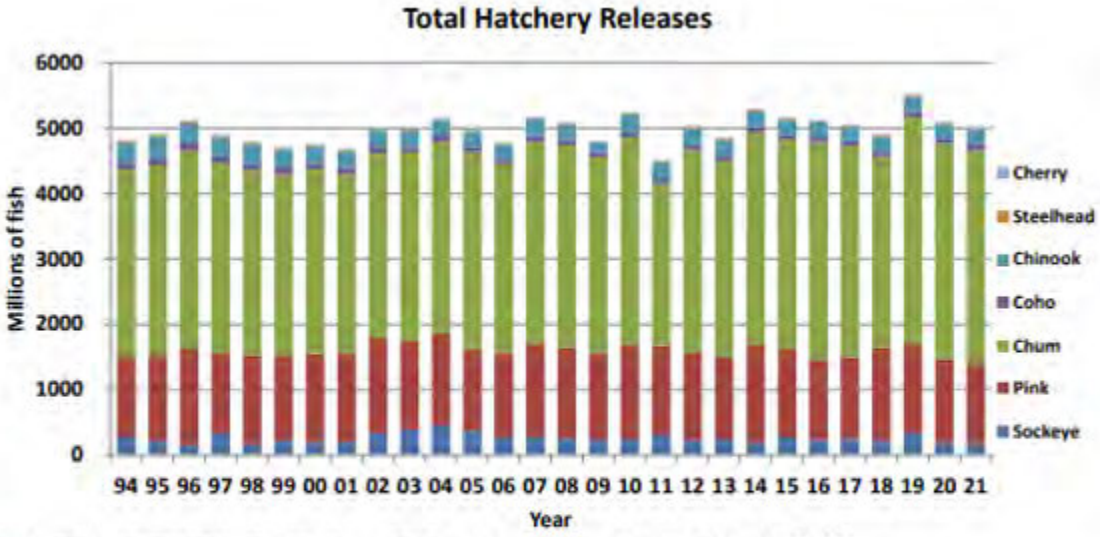


Figure 6. Annual hatchery releases of salmon and steelhead by species in millions of fish, 1993–2021.

Hatchery releases by species aggregated all-country totals show steady fry release numbers since the early 1990s. U.S. releases are mostly Alaska, although chinook and coho programs in the Pacific Northwest are significant. Graphs from NPAFC 2022.

II.Review/Discussion

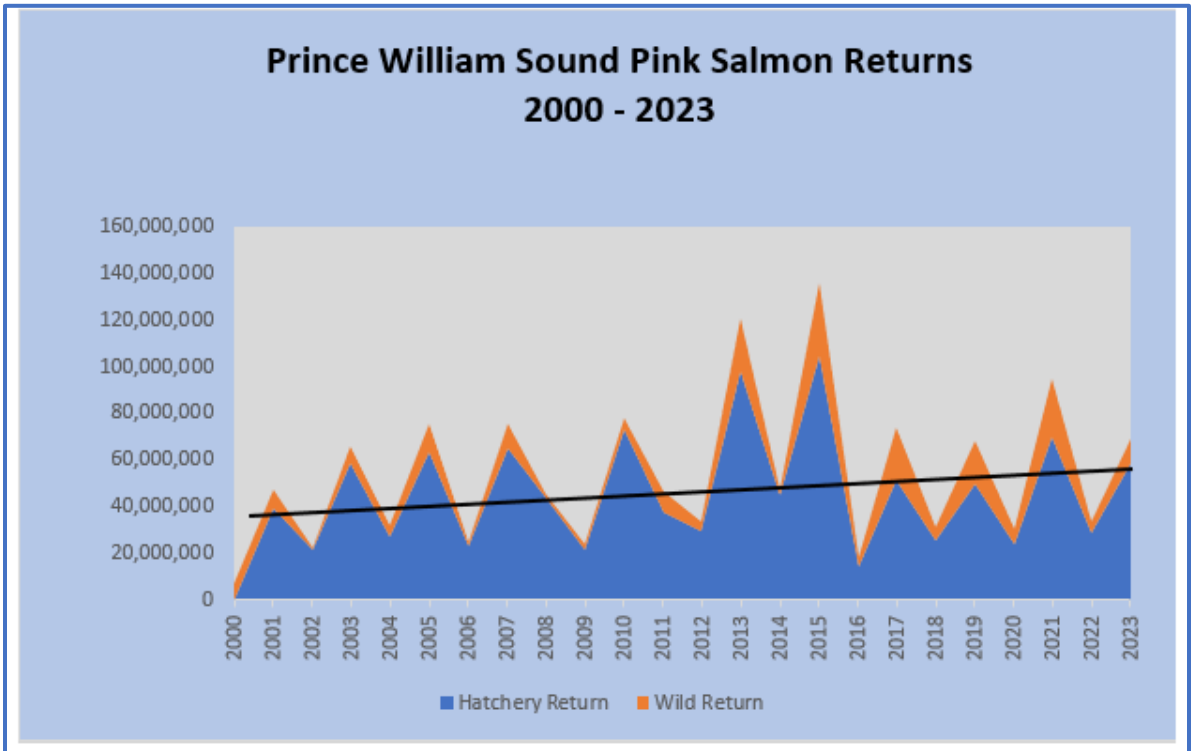
Ruggerone et.al. *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems, Ruggerone et.al.*[6]

The scientific method relies on systematic, testable, repeatable methodology, and common data sets, especially when referring to historical data, for two reasons.[7] First, the data set can be tested and repeated as in the original research. Second, the data set can be added to, replacing forecasted data (e.g., 2018 to 2023) with actual measured values. At the time of this writing, we were unable to obtain the data set Ruggerone cited to repeat the analysis -- a fundamental aspect of the scientific method. Furthermore, the biomass of immature and adult salmon cited in the abstract and picked up by casual observers "…hatchery production (~40% of the total adult and immature salmon biomass)" does not align with NPAFC data used in the paper cited previously. From 1990 to 2015, pink salmon's immature and mature biomass (hatchery and wild) was around 800,000 metric tons, or 22% of total biomass. The total abundance of wild

[6] Ruggerone et.al. 2023. From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems
[7] Lackey R., 2020. Darwin Was Right: A Scientist Needs a Heart of Stone

pink salmon fry in the North Pacific is proportionally 85%, with hatchery pink salmon making up the remaining 15%.[8] Therefore the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%. Unfortunately, this fact seems to be misrepresented, or ignored when the original study is discussed in the press and public forums.

Regardless, major data sets, such as the one presented by Ruggerone, provide valuable insights. The paper does not argue a negative causal relationship between hatchery salmonids and wild salmonids, but rather synthesizes existing data sets to identify patterns and processes that may reveal how hatchery salmonids can potentially affect wild salmonids. To counter this notion, let's consider the actual data for Prince William Sound pink salmon. If we add Ruggerone's study to the five intervening years, wild pink salmon show an increasing productivity trend.



Prince William Sound wild and hatchery pink salmon returns 2000 – 2023. The Ruggerone paper does not include years 2016 – 2023 shown here. Note the wild stocks in orange showing increasing productivity in both odd and even years from 2017 – 2023 compared to year's 2000 - 2016. Data from ADF&G and PWSAC.

The authors acknowledge that the studies included in their synthesis did not necessarily imply causation, and therefore their work is speculative, as is true of similar past papers. Events may

[8] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

occur in tandem, but it does not necessarily mean that one directly causes the other. In scientific studies or data analysis, it is vital to differentiate between correlation (events happening together) and causation (one event directly influencing the other). Correlation may hint at a relationship between two things, but correlations can be misleading. In contrast, cause and effect is more akin to a sturdy bridge, supported by solid pillars of evidence and logical connections. This metaphorical bridge guides us with confidence from one understanding to another, unveiling the true nature of the world. Science, not advocacy, should be our guiding principle.

To explore an example from the Ruggerone paper, let's examine the predicted negative effects on herring stocks, where they specifically mention Sitka Sound herring. Contrary to their prediction, in the past five years, the large herring stocks in most of Alaska – Togiak, Kodiak, PWS, Craig, and Sitka Sound have increased significantly. For 2024, the Sitka Sound herring stock biomass is estimated by the ADF&G to be 406,228 tons of mature biomass, eclipsing any former biomass in Sitka Sound and exceeding that of Togiak. In 2023, the biomass in Sitka Sound was 292,669, a record until the 2024 estimate.[9] The PWS herring, decimated by the 1989 oil spill, has been down for two decades but is now forecasted to have a harvestable surplus in 2024. Kodiak experienced the largest herring harvest of the past two decades in 2023.

The ocean is complex, and the forecasting model presented by Ruggerone, et.al. misses the mark. Similarly, killer whales and humpback whales have increased by multiples of two to three times in the past three decades.[10] The model data may have been tailored for a particular outcome or simply overlooked the Alaskan killer whale population, rather they focused on Southern Resident killer whales, to suggest that pink salmon are the driver of their downfall. Yet, pink salmon production in the Salish Sea is minimal when compared to wild and hatchery pinks in Alaska where Killer Whales are thriving. There is a bit of anti-commercial fishing bias going on here. As an example, sport fishing groups – which funded some of the McMillan paper

[9] https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1552946314.pdf
[10] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

- signed on to the Wild Fish Conservancy's lawsuit[11] against the State of Alaska aimed at halting commercial trolling, but not sport fishing on the very same Pacific Northwest king salmon stocks.

Contrary to large data set modelling, comprehensive research has been conducted in the Bering Sea and North Pacific Ocean by fishery science teams from the United States, Russia, Korea, Japan. This includes International Year of the Salmon (IYS) ocean studies spanning 2018-2022, that aimed to fill significant information gaps in our understanding of salmon migration, productivity, and the effects of marine heat waves. The NPAFC, an international body that compiles and reports on salmon status and research over the past 30 years, is another organization intimately engaged in this research. The latest IYS report for 2023 is currently in press but reports from 2022 and earlier are available. We will delve into a selection of these studies and others, presenting a more mechanistic perspective on 'From Diatoms to Killer Whales.[12,13] ADF&G scientists have played a crucial role in these endeavors, including the recently formed Salmon Ocean Ecology Program. [14]

Without a doubt, pink salmon are the most prolific salmon species, possessing remarkable reproductive abilities and extensive range capabilities in the Northern Hemisphere. Wild pink salmon have extended their range into the Arctic and around to Scotland and Sweden. Evolutionarily, pink salmon are the most successful salmon species yet the least intra-genetically distinct, defined by their short residence in freshwater (where prey are more limited) and their ability to spawn in a trickle of water to large rivers, or intertidal estuaries. Reports suggest their genetic plasticity benefits them in a warming ocean, with the odd-year component faring better than the even-year brood line. One might argue that pink salmon are the most resilient of the salmonids.

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[11] https://www.fisheries.noaa.gov/agency-statement/noaa-fisheries-recent-actions-wild-fish-conservancy-v-quan
[12] https://www.npafc.org/
[13] Technical Report 22 Report of the Final Workshop (November 1–2, 2023) Describing Observations Made During Winter Surveys of the International Year of the Salmon Expeditions to the Gulf of Alaska. https://www.npafc.org/technical-report/
[14] https://www.adfg.alaska.gov/index.cfm?adfg=salmonoceanecology.main

The Ruggerone paper sets out their basis for production and biomass, which is summarized in Wertheimer as follows: During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20% abundance, 35% biomass) and sockeye salmon (13% abundance, 17% biomass).[15] Together the biomass of chum and sockeye salmon amounts to 52%. The total pink salmon biomass is 48%, of which approximately 85% of the 48% would be wild pink biomass. This equates to 41% wild pink biomass, **7% hatchery pink biomass** (all Pacific Rim countries), 35% chum biomass, and 17% sockeye biomass. The remainder of 4% biomass is coho and Chinook.

For additional context of salmonid biomass within total North Pacific nektonic biomass Shuntov et.al.[16] and Wertheimer provide the following insights:

> In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Since then, biomass of salmon has increased current levels of 4-5 million tons, representing 4-8% of total nektonic biomass during period of high abundance.

In terms of total ocean nektonic biomass, salmon represents a small proportion. Prince William Sound hatcheries release about 800 million pink salmon fry or 3% of total pink salmon numbers in Pacific Rim. Extrapolation of PWS pink salmon biomass as a proportion of total nektonic biomass would be a tiny fraction of one percent.

McMillan J., et.al. *A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*[17]

This study synthesized findings from 206 peer-reviewed publications worldwide to examine the impact hatcheries have on wild salmonids. While the effects have been reported to range from adverse to beneficial, a substantial 70% of these studies reported adverse effects, whereas 13% recorded minimally adverse effects. These articles discuss various species across North America, Europe, and Asia, offering useful context and discussion points from 50 reviewed publications.

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[15] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

[16] Shuntov, V. P., Temnykh O., and Ivanov O. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon *(Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28.

[17] McMillan J., et.al. A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids

The synthesis, originally composed of 11,000 research papers, was boiled down to a scorecard segregating the papers into categories - adverse, middling, and favorable. However, only a handful of these papers apply to Alaska, rendering percentage-based evaluation a rather peculiar methodology to gauge research validity. Most salmon research funding is directed towards the Pacific Northwest, known to yield negative outcomes due to the strategies employed aiming to rehabilitate wild salmon in the Columbia River Basin in particular. The forthcoming evaluation will largely encompass aggregated critiques of the Ruggerone and McMillan papers.

III. Alternative Research and Perspectives

Wertheimer A. & Heard B. 2018 *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate*

As mentioned, the 2018 Wertheimer paper will be resubmitted as a separate public comment, although updated with a cover memorandum that highlights additional information which further supports our contentions contained herein. The most significant event that has changed since 2018 is the Marine Heat Wave (MHW) that encompassed 2016 – 2019 and significantly affected adult chum and to a lesser extent pink salmon returns and survival in 2020 – 2022. During this period there were four years in which there were five federal fishery disaster designations in Alaska. [18]

- S.E. Alaska, Norton Sound, Yukon River, Chignik, Kuskokwim salmon fisheries, 2020 & 2021
- Copper River and PWS salmon fisheries, 2018 & 2020
- Gulf of Alaska pink salmon fisheries in PWS, Kodiak, Chignik, Lower Cook Inlet, S.E. Alaska & Yakutat, 2016

Research by International Year of the Salmon (IYS) demonstrates a strong linkage between the MHW years and return years for chum salmon. These research results will be covered in a

[18] https://www.adfg.alaska.gov/index.cfm?adfg=hottopics.fisherydisasters

section to follow. Significantly, it's worth noting that salmon productivity varies regionally and locally in Alaska and across the Pacific Rim; an issue we will delve into in this document.

IV. Review of Research Papers and Possible Mechanistic Effects for Salmon Dynamics

Howard K., October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research.* A presentation to Board of Fisheries. [19] and International Year of the Salmon[20]

In her presentation to the Board of Fisheries in October 2023, Dr. Howard provided a balanced assessment of the latest studies regarding salmon abundance, winter range, and oceanic sampling conducted by the International Year of the Salmon (IYS) researcher group. She also reviewed significant findings reported by the Northern Hemisphere Pink Salmon (Expert Group), an international body former by NPAFC. Both the IYS and the Expert Group are recent initiatives by the NPAFC aimed at addressing data gaps in our understanding of salmonids. Particularly noteworthy is the significant gap regarding the winter range and location of salmonids in the North Pacific, a point that was encapsulated in Howard's oral report.

The prevailing scientific consensus is that diet overlap exists among salmonids and nektonic fishes and avians. This overlap correlates to variations in species growth patterns and abundance. High survival rates of one species can coincide with a decline in another. Likewise, when one species thrives in abundance, the growth of another may decrease. For instance, high abundance of odd-year pink salmon can affect the growth rate of sockeye salmon in their third year at sea. While this does not necessarily affect survival, it does impact growth and hence reproduction rates. Such abundance associations also seem to affect salmon age at maturity; when one species is abundant, another's age of maturity may increase. As shown in Oke, et.al.[21]

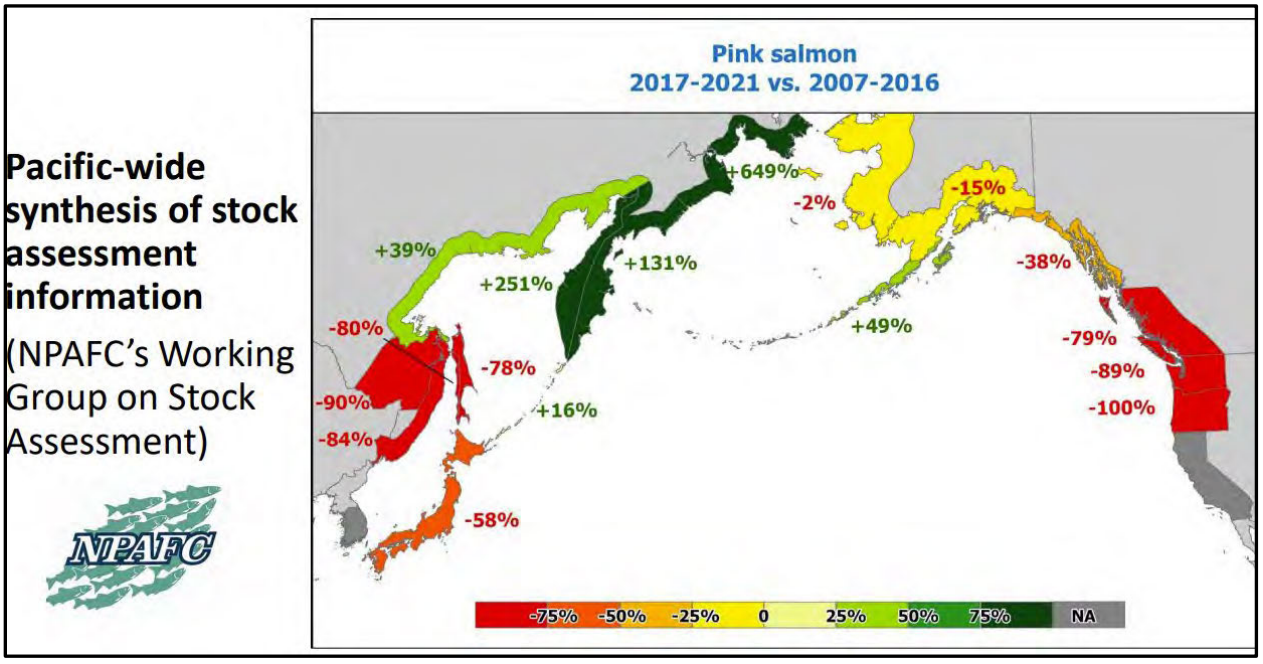
[19] Howard K**.,** Alaska Department of Fish and Game, October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research.* Presentation to Board of Fish

[20] https://yearofthesalmon.org/resources/

[21] Oke K., et.al. 2020 Recent declines in salmon body size impact ecosystems and fisheries

research, Alaska's pink and chum salmon may competitively impact coho salmon, irrespective of climate factors.

However, not all researchers agree on these findings. The Ruggerone paper and its proponents, predominantly based in the United States, argue that correlations between wild and hatchery pink salmon and the decline of other species present a problem. In contrast, the broader international research community remains unconvinced of these negative associations. To establish causality, mechanistic or direct evidence is crucial. Yet, the drive for funding and publication all too often leads to what is called by researchers as publication bias. Additionally, publication bias often results in nonnegative-relationships or null results not being published. The following discussion provides some perspective on the contrast between the proponent's arguments of corollary associations versus the body of research that points to drivers and/or mechanisms linked to empirical evidence.

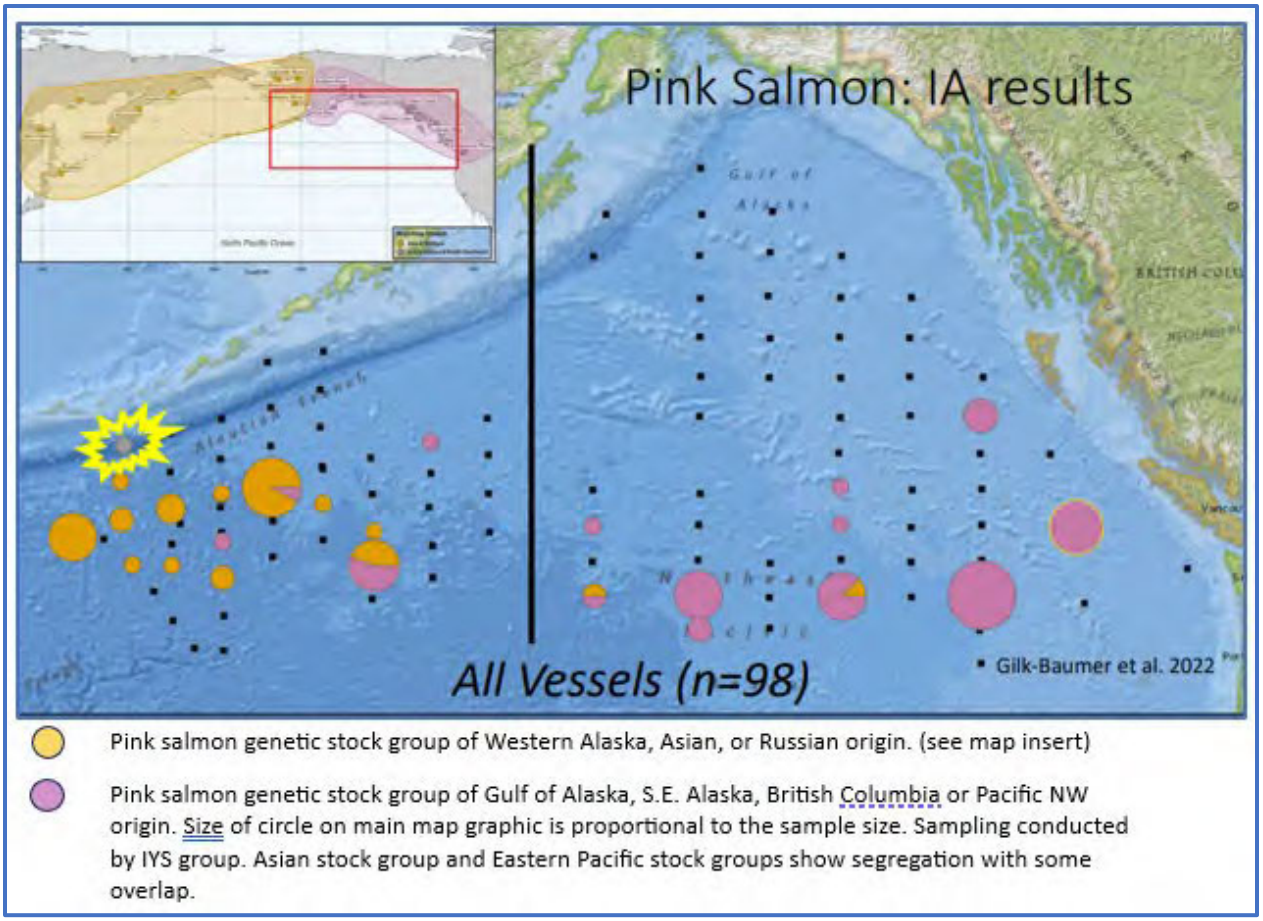


The Pacific Ocean, a vast expanse, is not uniform in terms of productivity, climate, temperature, and biological parameters. Evidence from the study of the Pacific Decadal Oscillation (PDO)[22]

[22] Mantua, N. et.al. 2001. The Pacific Decadal Oscillation

suggests significant shifts in productivity in the eastern Pacific, alternating between favoring the northeastern Pacific and the eastern Pacific south of British Columbia over different decades. The NPAFC's working group on pink salmon stock assessment observed significant shifts in pink salmon productivity across the Pacific Rim when comparing the period of 2017–2021 with that of 2007–2016. The accompanying map above illustrates these dramatic differences. Productivity of pink salmon in Russia increased two to six-fold, while in the Pacific Northwest (PNW), productivity declined by half. Most of Alaska also experienced a decline, albeit more modestly. It is worth noting again that during this period of decline, Alaska requested at least five federal disasters.

The International Year of the Salmon, which conducted research from 2018–2022, provided valuable information on salmonids' winter distribution across the Pacific from East to West. Genetic stock identification of salmon tissue samples taken across the Pacific revealed the country of origin, both wild and hatchery. This research sheds light on one of the mysteries of



the recent Yukon and Kuskokwim chum salmon decline. The Coastal Western Alaska Kodiak (CWAK) chum stock group (which includes Yukon, Kuskokwim, Bristol Bay, Norton Sound) were found to be unhealthy, with low fat content and empty stomachs for not just one winter, but two consecutive winters. These samples were taken during the Marine Heat Wave (MHW) years, which presaged the disastrous returns to the Yukon and Kuskokwim in 2020–2022.

Another crucial finding from the International Year of the Salmon (IYS) winter ocean studies is discernible from the map graphic presented above. The graphic clearly shows that pink salmon from Russia and Asia were primarily located in the western Pacific, while their Alaskan and Pacific Northwest (PNW) counterparts were predominantly in the eastern Pacific. There was some overlap, but it was minimal during the sampled years. **Shuntov et. al. observed that prey abundance for salmon was not a limiting factor.** It's worth noting that this period coincided with the all-time high of Russian and Central Asian pink salmon, as illustrated in the graphic on the preceding page. These geographical distribution patterns hold significant implications for understanding inter-species dynamics and potential competition for resources and underline the complex interplay of factors contributing to salmon performance across the Pacific.

North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group.[23]

In a section on *Competition and Interactions Between Pink Salmon and Other Species* from the report it states: "…..the ocean remains highly productive and pink salmon only consume a small fraction of the resources compared to more abundant species (e.g., walleye pollock). Pink salmon are also flexible foragers, eating a variety of prey and finding preferred feeding areas best suited to their traits. Indeed, the foraging areas and feeding habits among Pacific salmon species often indicate complimentary, rather than competitive, interactions."[24] This section included references that competition for prey can negatively affect other species at times.

[23] https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

[24] https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

Baumann, et.al 2014, *Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)*[25]

A body of research conducted in the Bering Sea challenges assertions of pink salmon exercising top-down control, instead suggesting a cold-water control mechanism at work. This research focuses on examining mechanistic linkages to explain nutrient transportation during periods of cold water, offering potential explanations for the cause-and-effect dynamics. Its significance lies in potentially shedding light on why nutrient availability dwindles during warm, ice-free years.

The study's main finding suggests that during cold years, diatoms emerge as dominant primary producers and particle exporters in the eastern Bering Sea. Zooplankton fecal pellets also played a crucial role in the particle export dynamic. These diatoms, which constitute a minimum of 70% of the vertical flux of total Chlorophyll a (TChl a), are the primary algal class to be exported from the light-exposed upper layers of the ocean, or 'photic zone', regardless of the TChl a and Particulate Organic Carbon (POC) flux.

The extent of particle flux from early spring to late spring and early summer may be largely dictated by zooplankton grazing. Early summer particle export is likely associated with the sinking phenomenon, typically observed in spring, and the Marginal Ice Zone (MIZ) primary production.

Daly, et.al. *Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska*, 2019 [26]

Evidence suggests that juvenile salmon, including pink salmon, were not causing a 'top-down' zooplankton resource bottleneck in the Gulf of Alaska. Based on the available zooplankton

[25] Matthew S. Baumann, S. Bradley Moran, Michael W. Lomas, Roger P. Kelly, Douglas W. Bell, and Jeffrey W. Krause Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)

[26] Elizabeth A. Dalya, Jamal H. Moss, Emily Fergusson, Richard D. Brodeur Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska. 2019

biomass, there appeared to be no reduction in the prey population due to excessive grazing by planktivorous (plankton-eating) juvenile fish where these prey were most abundant. Interestingly, the years 2010-2012 saw a significant increase in juvenile groundfish when the numbers of young, carnivorous salmon were lower. This raises questions about potential predation.

The paper explores these complex dynamics between juvenile groundfish and salmon in the Gulf of Alaska. It suggests that competition for prey (zooplankton) resources may be underway, potentially impacting the early marine growth and survival of these fish species, but the effect is not top-down control.

From the abstract of the paper

> "Neither the abundance nor stomach fullness of the juvenile planktivorous ground fishes or salmon correlated with station-level zooplankton biomass in 2012–13, **suggesting a lack of a resource bottleneck** (emphasis added) for these planktivores in these 2 years." and "Overall, during years when juvenile ground fishes survival was high, juvenile salmon survival was also high, suggesting sufficient food resources in the GOA".

Hunt and Stabeno, *Climate change and the control of energy flow in the southeastern Bering Sea*. 2002[27]

The Oscillating Control Hypothesis presented in this paper anticipates that the abundance of forage fish will be determined by a mix of bottom-up processes, (affected by the availability of zooplankton prey), and top-down processes, (influenced by predation by large fish-eating fish).

The shift of Bering Sea ice in spring dictates the occurrence of either an early ice-associated bloom in cold water or a late-spring open water bloom in relatively warmer water. Copepods, small crustaceans that serve as critical feed for young pollock, are sensitive to the water temperature in which they are developing. Consequently, copepod reproduction and the number of generations produced are notably higher in years with warm water spring bloom compared to cold water bloom years. This variation can significantly influence the growth and production of zooplankton, as well as the growth and survival rate of young fish.

[27] Hunt G., and Stabeno P. Climate Change and the control of energy flow in the southeastern Bering Sea 2022.

This study lends further evidence to the Ocean Climate Hypothesis, which envisages that the system should predominantly be **constrained by bottom-up fish recruitment** limitation during repeated cold springs associated with ice-formed blooms. Examining the environmental variability from the 1990s, the paper validates that attributes such as average depth temperatures are crucial for zooplankton and pollock. The study also notes a correlation between the biomass of adult pollock on the shelf and the productivity of Pribilof Island-nesting black-legged kittiwakes, a sea bird species whose presence often indicates a healthy fish population.

Arimitsu, et.al. *Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators.* 2021[28]

Contrary to expectations, during the recent anomalously warm conditions, which are thought to have resulted in top-down pressures controlling forage fish abundance in the northern Gulf of Alaska, **salmon were not the primary predators**.

This research paper delved into the impacts of the 2014-2016 Pacific marine heatwave on forage fish in the Gulf of Alaska. The researchers discovered that the measure of covariance among species within a community, a concept referred to as the 'portfolio effects' of forage fish species, could serve as an analytical framework for understanding the stability of ecosystem dynamics over time. They also found that the heatwave-induced extreme mortality of common murres was mitigated by the flexible foraging behavior of avian predators.

One critical finding underscores the vulnerability of fishes' demographic structure, which changes in response to size-selective removal processes, whether through predation, disease, or fishing. This change weakens the population's ability to buffer environmental variability, leading to poor recruitment and subsequently, low survival rates. It can also impact spawning dynamics as smaller, younger individuals, which produce fewer eggs, rise in population. The quantity of produced eggs, or fecundity, is strongly related to size.

[28] Arimitsu M., et.al. Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators 2021,

Sturdevant, M. et.al. 2011. *Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska* [29]

A research paper conducted a comparative analysis of the diets of wild and hatchery chum salmon in the littoral habitat of outer Taku Inlet, near Juneau, Alaska. Findings from the study revealed significant variances. The diet of wild chum salmon consisted of more insects, larvaceans, barnacle and euphausiid larvae, gammarids, large and small calanoids, and fish compared to their hatchery counterparts. Hatchery fry consumed similar prey but in different quantities, the first-year diet containing more gammarids and hyperiids than the wild fry, while in the second year consuming a higher proportion of calanoid copepods. The study also concluded that the diet composition of both wild and hatchery chum salmon showed more similarity within the same year than across different years. Further, the diets of these fish in the inner-middle locations of Taku Inlet showed more similarity than those in the outer area.

The research also observed an interesting trend in the condition of hatchery chum salmon. Upon release, these **hatchery fish were larger and had a higher energy density than the wild** salmon. However, in the early weeks post-release, as they adapted to a diet constituted by wild prey, they exhibited a **drop in their condition**. **Approximately forty days later, their energy densities had not only recovered but had also aligned with those of the wild salmon.** Importantly, they showed higher energy densities as compared to the time of release in Taku Inlet. This research provides insights that could inform methods to improve the adaptability and survival rate of hatchery chum salmon post-release.

[29] Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska 2011. Sturdevant M., Fergusson E., Hillgruber N., Reese C., Orsi J., Focht R., Wertheimer A., & Smoker B.

Batten S., 2022. *Responses of Gulf of Alaska plankton communities to a marine heat wave.*[30]

The Batten paper published in 2022 postulates possible mechanisms causing lower productivity brought on by the marine heat wave (MHW) in the North Pacific Gulf of Alaska. The abstract lays out their findings:

> Time series of phytoplankton and zooplankton collected from the shelf and oceanic northern Gulf of Alaska from 2000 to 2018 are examined to describe changes in abundance and composition that occurred during the 2014–2016 marine heat wave (MHW). Zooplankton abundances were very high on the shelf during the MHW, particularly copepods and pteropods, while large diatoms were very low. Community Temperature Indices (CTI) were derived and showed significant, positive correlations with temperature for both trophic levels on the shelf and in the deep ocean. While no common taxa disappeared from the communities, there were changes in relative abundance that contributed to the increase in CTI. Additionally, some rarer taxa were not found during or after the MHW, and fewer new taxa appeared with its onset. There is thus evidence for a change in ecosystem functioning in the lower trophic levels with the northeast Pacific MHW bringing; lower plankton taxonomic richness, a bias towards species that prefer warm conditions, increased effects down the food chain, likely exerted by changes in forage fish, and uncertainty in data from 2017 to 2018 as to whether plankton metrics had, or would, return to pre-MHW values.

Orsi J., 2005. *Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions*[31]

The study estimated the total abundance of hatchery and wild chum salmon in northern southeast Alaska region. The total prey consumption varied depending on mortality rate assumptions, but the salient point is **only a small percentage of available zooplankton was consumed by juvenile chum salmon**. The study noted the need for additional research to determine physiological input parameters and improve abundance and mortality estimates. The abstract details the scope of work, findings and possible limitations:

> Bioenergetics modeling was used to estimate zooplankton prey consumption of hatchery and unmarked stocks of juvenile chum salmon (Oncorhynchus keta) migrating seaward in littoral (nearshore) and neritic (epipelagic offshore) marine habitats of southeastern Alaska. A series of model runs were completed using biophysical data collected in Icy

[30] Batten S., Ostle C., Helaouet P., Walne A. 2022. Responses of Gulf of Alaska plankton communities to a marine heat wave.

[31] Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions

Strait, a regional salmon migration corridor, in May, June, July, August, and September of 2001. These data included a temperature (1-m surface versus surface to 20-m average), zooplankton standing crop (surface to 20-m depth versus entire water column), chum salmon diet (percent weight of prey type consumed), energy densities, and weight. Known numbers of hatchery releases were used in a cohort reconstruction model to estimate total abundance of hatchery and wild chum salmon in the northern region of southeastern Alaska, given average survival to adults and for two different (low and high) early marine littoral mortality rate assumptions. **Total prey consumption was relatively insensitive** to temperature differences associated with the depths potentially utilized by juvenile chum salmon. However, the magnitudes and temporal patterns of total prey consumed differed dramatically between the low and high mortality rate assumptions. Daily consumption rates from the bioenergetics model and CPUE abundance from sampling in Icy Strait were used to estimate amount and percentage of zooplankton standing crop consumed by mixed stocks of chum salmon. We estimated that only **a small percentage of the available zooplankton was consumed by juvenile chum salmon**, even during peak abundances of marked hatchery and unmarked mixed stocks in July. Total daily consumption of zooplankton by all stock groups of juvenile chum salmon was estimated to be between 330 and 1764 g/km2d1 from June to September in the neritic habitat of Icy Strait. As with any modeling exercise, model outputs can be misleading if input parameters and underlying assumptions are not valid; therefore, additional studies are warranted, especially to determine physiological input parameters, and to improve abundance and mortality estimates specific to juvenile chum salmon. Future bioenergetics modeling is also needed to evaluate consumption by the highly abundant, vertically migrating planktivors that co-occurred in our study; we suggest that these fishes have a greater impact on the zooplankton standing crop in Icy Strait than do hatchery stock groups of juvenile chum salmon.

Shuntov, V. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.)*.[32]

Shuntov et.al. discusses marine ecology of Pacific salmon, including their interaction with sea surface temperatures, food shortages, competition, effect on other species, and habitat restrictions. These Western-centric ideas and syntheses of data are contrary to the research findings from the Pacific Research Fisheries Center (TINRO Russia). Pacific salmon have a wide range of habitats and can adapt to various temperatures. They can migrate vertically and have a diverse diet. These salmon are dispersed and can satisfy their dietary needs across large areas with low prey concentrations. "**The total biomass of all the Pacific salmon species** in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters). In stark

[32] Shuntov, V. P., Temnykh O., and Ivanov O. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28.

contrast, the biomass of other common nekton species is estimated at a few hundred million tons. **Salmon account for 1.0–5.0% of the total amount of food consumed by nekton** in the epipelagic layer of the western Bering Sea. In summary, they play a moderate role in the food webs of subarctic waters based on their research delineated in the abstract:

> Some of the views on the marine ecology of Pacific salmon (Oncorhynchus spp.) that were popular in the second half of the 20th century are discussed critically: the absolutization of the influence of sea surface temperature on distribution of salmon and strength of their year classes, as well as the conclusions on the shortage of food (particularly in winter) and the fierce competition for food, the "suppression" of other salmon species and one adjacent broodline by pink salmon, the limited carrying capacity of the pelagic zone of subarctic ocean waters for salmon, the distortion of the structure of epipelagic communities in ecosystems of the North Pacific due to the large-scale stock enhancement of chum salmon, etc. Most of these ideas have not been confirmed by the data of long-term monitoring conducted in the form of complex marine expeditions by the Pacific Research Fisheries Center (TINRO Center) in the Far-Eastern Seas and adjacent North Pacific waters since the 1980s. The data show that Pacific salmon are ecologically very flexible species with a wider temperature range of habitat than was previously believed. Salmon are able to make considerable vertical migrations, easily crossing zones of sharp temperature gradient and different water masses. Having the wide feeding spectra and being dispersed (as non-schooling fish) when feeding in the sea and ocean, they successfully satisfy their dietary needs in vast areas even with relatively low concentrations of prey organisms (macroplankton and small nekton). The total biomass of all the Pacific salmon species in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters), whereas the biomass of other common species of nekton is a few hundreds of millions of tons. Salmon account for 1.0–5.0% of the total amount of food consumed by nekton in the epipelagic layer of the western Bering Sea, 0.5–1.0% in the Sea of Okhotsk, **less than 1% in the ocean waters off the Kuril Islands, and 5.0–15.0% in the ocean waters off East Kamchatka**. Thus, the role of Pacific salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species.

V. Precautionary approach

The State of Alaska statutes, alongside Alaska Department of Fish and Game regulations, has adopted a precautionary approach to salmon enhancement. Concurrently, the PNP associations have cooperated closely with the department to develop programs that minimize interactions with wild stocks.

The State captured concerns about the possible local effects of introgression – gene flow from hatchery fish to wild fish - in its 1985 genetics policy.[33] In 2011, in response to the request from the PNPs to the Commissioner of Fish and Game, a science panel was established to investigate the introgression caused by hatchery strays into wild stock streams. After twelve years of consistent study and monetary investment of over $20 million, this science panel has been actively sharing its findings with the Board and the wider public. Discussions are currently underway between the ADF&G and PNP operators about the next phase of research.

VI. Concluding Remarks

Over the past 25 years, Alaska salmon have demonstrated remarkable abundance (except for Chinook) which has raised concerns about possible exceedances of the ocean's carrying capacity. The high abundance and variability of these salmon populations appear to be largely due to oceanic survival conditions rather than density-dependent interactions. Over the last quarter-century, Alaska's salmon harvest has maintained consistently high yields from wild stocks, supplemented by substantial contributions from hatchery fish. While density-dependent interactions have been observed at various salmon life stages and in different habitats, these interactions have not inhibited the salmon population's recovery from its 1970's low levels.

However, fluctuating climate patterns and oceanic events, such as marine heatwaves in the Gulf of Alaska, potentially have wide-reaching implications for salmon populations. These events underscore the unpredictable nature of ocean conditions that influence salmon at both local and regional scales.

[33] https://www.adfg.alaska.gov/static/fishing/PDFs/research/genetics_finfish_policy.pdf

Empirical support in favor of hatchery fish comes from the enhancement programs in Prince William Sound (PWS) and Southeast Alaska. Despite variable productivity over the past few years, both wild and hatchery pink salmon have closely tracked the odd-even brood line patterns in PWS in the past six years, the average even-year return for wild pinks in PWS has exceeded five million, a considerable increase from the two-million average wild return twenty years ago. By targeting hatchery fish, wild escapement goals are being met, resulting in new record highs for the harvest and production of both hatchery and wild pink salmon. This suggests that the large-scale release and return of hatchery pink salmon have not undermined the production potential of wild stocks, irrespective of their high or low abundance. A similar story holds true for southeast Alaska wild and hatchery chum salmon.

Thank you for your time, your interest, and most importantly, your dedication to ensuring an enduring legacy for future generations of salmon and the people of Alaska. We appreciate your commitment to understanding the complex dynamics of our freshwater and marine ecosystems and look forward to continuing an exchange of knowledge and perspectives.

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Prince William Sound Aquaculture Corporation
Geoff Clark, General Manager/CEO

Douglas Island Pink & Chum
Katie Harms, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

February 02, 2024

Dear Chairman Wood and Board of Fisheries members:

I was born and raised in this state. I learned to fish on the Little Sue and Kenai rivers. It has always been a very cherished part of my relationship with my father and brother but also now one I cherish with my friends especially because I got the honor of teaching them how to fish. My dad also now has a cabin with Kenai access and it is where I spend nearly every weekend in the summer. Working on the house and fishing with my old man. It is also my inheritance and where I plan to retire someday. In the time I have lived in this state (nearly 27 years now) I have only ever caught TWO kings. One from the ocean near Ninilchik and one by accident in Campbell creek. I find it extremely sad that as such an avid fisher person I have not ONCE caught a Kenai king. As a child it was a dream and a goal. As an adult I purposely do not fish for kings in the Kenai because I know it is better if I don't. I want there to be kings - particularly the massive, now legendary kings of lore that are 50+ pounds! But that will not happen without stricter regulations on commercial fishing and a halt on all sport fishing of kings until the population is at a sustainable level.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Amanda Allard
Anchorage, AK

Submitted by: Lance Alldrin
Community of Residence: Chico, CA/Nikiski AK

Proposal 92 SUPPORT: When the East Forelands exemption was put in place during the 2016 meeting, it was a board generated proposal. This exemption was only fished one day during that 3 yr regulatory cycle. Data shows that the E.F. subsection catches less than 1.5% of the total kings caught (all sizes and origins), the lowest of any subsection in the ESSN (per currently published data on the F&G comm fish website).

Proposal 96 SUPPORT: I have fished flagged nets both intentionally and unintentionally while fishing prior seasons in subsections other than my current sub section (East Forelands). I have NEVER caught a king and I believe this is due to the fact that kings will often get pressed into a gill net by the pressure from the current and with a flagged net, the king would just "skip" down the length of the net without getting gilled (unlike a smaller fish like a sockeye would). Of all the proposals submitted, flagged nets, dip nets and a beach seine are the ONLY methods presented that would either not catch kings or would allow the live removal of kings immediately from the net. I would like to see the set net fishery given one of these three options within the paired restrictions PRIOR to being shut down for the season.

Proposal 107 OPPOSE: There are many areas in the ESSN set net fishery where due to the strength of the current or depth of the water, fishing one half mile or more off shore is just not possible.

Proposal 112 OPPOSE: There is no reason to raise the upper limit of the sockeye escapement goal as there is no way to control the upper end if the ESSN fishery is not fishing.

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 84: Support	Proposal 85: Support	Proposal 86: Support	Proposal 87: Support
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Support	Proposal 93: Support
Proposal 94: Support	Proposal 96: Support	Proposal 97: Support	Proposal 98: Support
Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support
Proposal 107: Oppose	Proposal 108: Support	Proposal 110: Support	Proposal 111: Support
Proposal 112: Oppose	Proposal 113: Support	Proposal 115: Support	Proposal 116: Support
Proposal 130: Support	Proposal 132: Support	Proposal 133: Support	Proposal 134: Support
Proposal 137: Oppose	Proposal 138: Support	Proposal 139: Support	Proposal 141: Oppose
Proposal 142: Support	Proposal 143: Support	Proposal 148: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 174: Oppose	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 193: Support	Proposal 195: Support	

Submitted by: Ben Allen
Community of Residence: Wasilla, Alaska

Proposal 238

Strongly Opposed-

The author of this proposal is documenting his observations of habitat concerns, in close proximity to the Little Susitna Public Use Facility of the Little Susitna River, not the whole watershed. The Little Susitna River is a 110 mile river that flows from its headwaters at Hatchers Pass. The Little Susitna River is an intact watershed that largely flows through an untrammeled landscape. It would be arbitrary and capricious, to impose a horsepower restriction to an entire watershed of which has extremely poor public access, due to the ambiguous observations of one individual, for less than 1% of the total watershed bank habitat. The Little Susitna River is astronomically different from the Kenai River referenced in this proposal. The Little Susitna River as a whole has extremely low sport fishing participation and recreation, largely due to lack of access and opportunity to catch and harvest salmon– due to a decline in silver and king salmon abundance. The entire Susitna drainage and Knik Arm is currently experiencing poor returns of King and Coho salmon, including streams such as Willow Creek, which has very minimal power boat usage. Poor returns are occurring on a much larger scale than the Little Susitna River. Data confirming a steep decline in boating participation, fishing and public use on the Little Susitna River out of the LSPUF (the only major access point on the Little Susitna River) can be obtained from Alaska State Parks and ADF&G. The Little Susitna River has 1 maintained public access for motor boats–very different from the Kenai. The Kenai River is a lot deeper than the Little Susitna River and can be safely operated with a prop driven vessel contrasting the Little Susitna River, where jet propulsion allows for safe travel and access.

At least 85% of the boats currently operating on the Little Susitna River would not be able to operate with a 50 horsepower head (as on the Kenai) outboard with a jet. Due to inflation and increasing costs of motors, the majority of users will not be able to afford repowering the boats that can be repowered. Many users would need to purchase a new boat and motor to participate. Who would even make a substantial investment in new equipment to participate in a highly unpredictable, highly regulated and very limited declining fishery? A horsepower restriction would limit and in most cases prohibit guides from using this venue, due to the inability to transport passengers due to lack of power for their vessel. Guides and their customers currently pay for a greater percentage of season and day use fees that allow the park to be open.

My biased opinion is that this proposal makes an explicit attempt to decrease participation at this venue for their own benefit. The fact is that the State of Alaska provides an abundance of strictly bank (no boats) accessible salmon fishing opportunities in the Matsu Valley in contrast to boating opportunities.

Imposing a horsepower restriction on the Little Susitna River at this time, without any other new access opportunities, would be devastating for the majority of sportfishermen, hunters and recreationists on the Little Susitna River. At this point there is no way to float the Little Susitna River in less than 2 days (to fish the river effectively- 4 days is necessary), since the nearest put in is at Houston 41 river miles upstream of the LSPUF. Downstream of the LSPUF at river mile 28.5 there is no take out. A horsepower restriction, would result in an increase of illegal off road vehicle use within the Susitna Flats State Game Refuge and legal and illegal off road vehicles throughout the watershed, resulting in significant impacts to the watershed, that would be very difficult and expensive to quantify.

The Matsu Valley has very limited opportunity to catch and harvest salmon from a boat within 45 minutes of Wasilla and Palmer. Elderly and users with disabilities who depend on boat access to participate in salmon fisheries will be severely hurt if this proposal is approved.

This proposal is speculative, providing no data, no quantitative and qualitative observation, or meaningful information suggesting a horsepower restriction will improve watershed health and habitat. Feeling a

horsepower restriction is necessary because an individual is observing waves near a boat ramp, does not justify establishing this regulation. The LSPUF was established, and funded primarily for power boat access.

My personal opinion is I'd rather hike, or float the river. But to access and enjoy the majority of the Little Susitna River, a powerboat is necessary. Given the current access situation, powerboating, without horsepower restrictions, provides the least impactful use of the Little Susitna River resource, for current users, being predominantly Alaskans and some visitors to enjoy the Little Susitna River in its entirety.

With boat participation to be at an all time low in the history of this fishery since the establishment of the LSPUF, it's honestly pointless to even have the conversation about boating restrictions. Most days in the summer there are rarely more than 2 boats using the river and often there are none. The conversation should be how do we get more fish in the river, for the benefit of everyone.

And riverboat safety and operation of which a horsepower restriction does not solve.

More powerboats access the Kenai River from the Pillar's State Park Boat Launch and Eagle Rock, in 1 day in July, than powerboats on the Little Susitna River for the entire season, which can be verified with Alaska State Parks.

Proposal 238: Oppose

PC8

Submitted by: Oliver Ancans
Community of Residence: Eagle River, AK

Proposal 29

I fully support the closure of the guided helicopter fishing for the accessible rivers on the lower Kenai peninsula. Many anglers have had issues with the helicopter landing within a very close vicinity and dropping off clients. These rivers are all very accessible on foot, and there is no need for guided helicopter fishing. As these river become more popular and native steelhead numbers continue to decline worldwide, these special fisheries must become more protected and guided helicopter fishing is not only unnecessary, it is now becoming a matter of can is be considered "fair chase".

PC9

Submitted by: Kasiana Anderson
Community of Residence: Palmer, Alaska

I have grown up around commercial fishing my whole life. I am a 4th generation Alaska Native woman who is apart of the Eastside Setnet Fishery and hope to continue the tradition with my own family one day. However, that cannot happen when we keep getting shut down without hearing us out. In 2023, the Eastside Setnet Fishery was the only area shut down for the whole season. There was no way for us to fight against it and let our voices be heard. Many families were left without anything to support their families and businesses. I would like to see a change for the ESSN and get more positive outcomes.

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support

Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support	Proposal 178: Support
Proposal 179: Support	Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose
Proposal 185: Support	Proposal 186: Support	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose
Proposal 195: Support	Proposal 196: Support	Proposal 197: Support	Proposal 198: Support
Proposal 199: Support	Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose
Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose
Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose
Proposal 215: Support	Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose
Proposal 232: Oppose			

PC10

Submitted by: Shayla Anderson
Community of Residence: Mukilteo, WA

To the Board of Fisheries:

Commercial fishing means the absolute world to me and my family. It means working hard, along side my parents, brothers and children to continue my Grandfather's and Great Grandfather's legacy and to provide wild salmon to our country. The life skills, memories and joy commercial fishing brings me is irreplaceable. I am a strong, hardworking and tough woman today because of commercial fishing and the thought of my children not being able to learn those same skills is the worst heartbreak there could be. My hope and dream is for the current and future generations is to be able to have the opportunity to harvest excess sockeye salmon entering the Kenai River.

The actions taken at the 2020 BOF meeting to protect late-run Kenai king salmon, created an unattainable Optimum Escapement Goal (OEG) which in turn closed the ESSN 2023 season, leaving many 100 year old commercial fishing businesses without the opportunity to harvest the excess sockeye salmon to feed the world, without opportunity to pay their bills and support their families.

The Optimum Escapement Goal (OEG) adopted in 2020 has closed the fishery and businesses cannot survive a fishery that gets ZERO opportunity based on a small harvest of a non-target stock of Kings.

The pairings in place are NOT equitable and do not share the same burden of conservation among all user groups.

Interaction with King Salmon happens in EVERY other fishery in Upper Cook Inlet that harvests Kenai and Kasilof sockeye and ONLY, the Eastside Setnet Fishery, was left with ZERO opportunity in 2023.

I believe that there is some opportunity for harvest in the ESSN fishery between the Large King Sustainable Escapement Goal (SEG) 13,500-27,000 and Optimum Escapement Goal (OEG) 15,000-30,000.

I strongly oppose proposals 90 and 106, in addition to proposals: 101, 112, 141, 150, 153, 154, 155, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 193, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232.

I support proposals 77, 80, 81, 85, 86, 87, 88, 91, 97, 100, 102, 103, 110, 114, 116, 117, 119, 120, 128, 130, 133, 144, 145, 146, 147, 148, 149, 151, 152, 160, 161, 163, 164, 173, 176, 177, 178, 179, 180, 181, 185, 186, 189, 190, 195, 196, 197, 198, 199, 200, 211, 215.

I know that we can all share the resource and I trust that you will make the right decision for all user groups at this meeting. provide wild salmon to the world with that same joy and happiness it brings me. Commercial fishing on Salamatof Beach is my livelihood.

Sincerely,

Shayla Anderson (3rd Generation Commercial Fisherman and Kenaitze Tribal Member)

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
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Proposal 150: Oppose	Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose
Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

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PC11

Submitted by: Dale Ballard
Community of Residence: Troutdale, OR

Re.- Proposal 83. I strongly support the tenets as stated in the document prepared by Francis Estalilla. His recommendations are very well thought out and I believe offers the best chance of recovery for the large fish of the Kenai River. Any action that lessens the Optimum Escapement Goal for these fish is a declaration of their impending demise. Furthermore, I strongly urge until such time the Kenai Kings reach self sustaining levels on both early and late run kings, in season regulations adopt as permanent rule, no retention of kings until sonar counts indicate some retention could be allowed without going under the OEG.

Proposal 83: Support

Dr. William Bechtol - Public comment supporting Proposal 216

PROPOSAL 216 - Reduce the commercial smelt guideline harvest level in Upper Cook from 200 tons to 100 tons.

My comments address the following aspects with further details below:

Dr. William Bechtol

1. The Board of Fisheries established a Forage Fish policy to consider the ecosystem role played by forage species such as eulachon.
2. Eulachon are an important forage item for many species, including endangered Cook Inlet beluga whales, in both fresh and salt waters.
3. The eulachon population spawning in the Susitna River has little assessment data.
4. The existing GHL is arbitrary.
5. Climate change is affecting productivity in freshwater and marine ecosystems, often in ways we cannot anticipate, and a precautionary approach to management is warranted.

1. The Forage Fish Management Plan (5 AAC 39.212) recognizes the importance of forage fish, specifically including eulachon, as ecosystem components critical to higher trophic levels. Previous Board of Fisheries discussions (e.g., 2017 meeting) raised concerns about how eulachon harvests may impact rebuilding of endangered Cook Inlet beluga whales (CIBW). But there has been little recognition of eulachon as an ecosystem component in Cook Inlet.

2. Eulachon primarily feed on plankton, euphausiids, mysids, and amphipods. An oil-rich prey (15-20% oil content), eulachon are consumed by numerous mammals, birds, and fish (Gustafson et al. 2010). Pinnipeds Stellar sea lions and northern fur and harbor seals prey on eulachon, with nonpinniped predators including humpback, orca, and beluga whales, harbor and Dall's porpoises, and Pacific white-sided dolphins, and terrestrial mammals such as river otters, mink, and bears likely feed on eulachon during spawning events. Birds preying on live and dead eulachon include gulls, terns, ducks, bald eagles, shorebirds, corvids, and other birds. Similarly, fish preying on different eulachon life stages in fresh and salt waters include spiny dogfish, Pacific cod, walleye pollock, Pacific halibut, sablefish, rockfish, arrowtooth flounder, Pacific herring, surf smelt, Pacific sand lance, kelp greenling, three-spine stickleback, steelhead, all five Pacific salmon species, and Dolly Varden.

   Eulachon are a critical prey for endangered CIBW emerging from a winter with limited food resources and entering a spring period of birthing and nursing (NMFS 2016). As a distinct population segment in Upper Cook Inlet, estimates of CIBW declined 2.3%/year from 2008 to 2018, then increased less than 1%/year to 2022. Through spring feeding on eulachon, CIBW start to rebuild their energy reserves, followed by feeding on king and coho salmon during the summer. Recent declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females.

3. Despite the relatively long fishery history, there have been few assessments of the Susitna River eulachon population: (1) a 1982–1984 project used gillnets to assess run timing and collect age, sex, and size (ASL) data, and evaluated spawning habitat (Barrett et al. 1984; Vincent-Lang and Queral 1984); (2) a 2013 project used hydroacoustics (sonar) to develop an

index of abundance and run timing and collected ASL data (HDR and LGL 2014); and (3) a 2016 ADF&G project estimated spawning abundance and collected ASL data (Willette and DeCino 2023). Projects 1 and 2 were part of the Susitna-Hydro dam studies.

The 2016 project indirectly estimated eulachon escapement by counting eulachon larvae moving downstream after spawning and extrapolating fecundity of adult eulachon migrating upstream (Willette and DeCino 2023). Planned as a three-year study, future years were cancelled, but the board increased the eulachon commercial GHL to 200 tons in 2017. The 200-ton commercial harvest cap has remained since 2017 without additional assessments.

Living 3–5 years, eulachon likely exhibit wide abundance swings based on spawning conditions, larval rearing conditions, and the marine environment. Eulachon population estimates in nearby waters of Lower Cook Inlet and the Northern Gulf of Alaska declined in recent years, but updated abundance data are not available for Upper Cook Inlet.

4. As a relatively short-lived, anadromous, species, eulachon spend their lives in the marine environment except for the spring spawning period. Commercial eulachon harvests in Upper Cook Inlet initially occurred in 1978, 1980, and 1998 with respective catches of 300, 4,000, and 18,900 pounds (Table 1; Shields 2005, 2006; Lipka and Stumpf 2024; L. Stumpf, ADF&G, per. com.). In 1998, ADF&G recommended an arbitrary 50-ton (100,000-pound) harvest limit for the Upper Cook Inlet commercial smelt fishery, resulting in a 1999 commercial harvest of 50 tons. Development of the Forage Fish Management Plan (5 AAC 39.212) closed the commercial fishery in Upper Cook Inlet from 2000 to 2004. With adoption of the Cook Inlet Smelt Fishery Management Plan (5 AAC 21.505), the commercial fishery reopened in 2005 with a 100-ton (200,000-pound) GHL, only hand-operated dip nets, and the intent to maintain this GHL until a general assessment of stock strength could be made. Based on the 2016 ADF&G study and a 2017 proposal, the board increased the GHL to 200 tons (400,000 pounds) in 2017. Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and ASL data are only opportunistically collected from the commercial harvest. Thus, the GHL increased from 50 to 200 tons over the past 25 years without a consistent assessment of eulachon population changes.

5. Climate change is altering freshwater and marine productivity. We lack consistent stock assessment data for Susitna River eulachon, making it difficult to consider climate change impacts on Susitna River eulachon and higher trophic level species that depend on eulachon.

Summary – The commercial fishery for eulachon spawning in Upper Cook Inlet, primarily in the Susitna River, dates to 1978 with the GHL, reported as smelt, increasing from 50 tons to 100 tons to 200 tons. Eulachon serve as a major prey item for a wide variety of birds, fish, and mammals, including endangered CIBW. Being relatively short-lived, eulachon might be expected to undergo periodic and dramatic population fluctuations. Yet there is no annual stock assessment of the Susitna River eulachon population, and there have only been three formal studies that examined age, sex, and length and examined run timing based on CPUE indices, although the sampling gear differed for each study. In the absence of consistent eulachon assessments, a reduction of the commercial eulachon harvest cap to 100 tons is warranted as a precautionary approach to protect the eulachon population and for ecosystem considerations.

Table 1. Commercial eulachon harvest and effort in Upper Cook Inlet, 1978–2023.

Year	GHL (tons)	Harvest		Permits
		Pounds	Tons	
1978	NA	300	0.2	NA
1980	NA	4,000	2.0	NA
1998	50	18,610	9.3	2
1999	50	100,000	50.0	NA
2005	100	0	0	8
2006	100	90,783	45.4	8
2007	100	125,044	62.5	11
2008	100	127,365	63.7	6
2009	100	78,258	39.1	6
2010	100	126,135	63.1	3
2011	100	201,570	100.8	5
2012	100	195,910	98.0	4
2013	100	190,830	95.4	4
2014	100	198,814	99.4	4
2015	100	213,934	107.0	4
2016	100	191,536	95.8	4
2017	200	18,685	9.3	<3
2018	200	382,967	191.5	4
2019	200	389,473	194.6	6
2020	200	423,613	211.8	7
2021	200	444,838	222.4	7
2022	200	335,494	167.7	7
2023	200	177,588	88.8	5
Average		201,572	100.8	5.2
St.Dev.		129,246	64.6	2.3

NA – Not available; Sources: Shields 2005, 2006; Lipka and Stumpf 2024; L. Stumpf, ADF&G, per. com.

References:

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Gustafson, R.G., M.J. Ford, D. Teel, and J.S. Drake. 2010. Status review of eulachon (*Thaleichthys pacificus*) in Washington, Oregon, and California. U.S. Dept. Commer., NOAA Tech. Memo. NMFS-NWFSC-105, 360 p.

HDR and LGL. 2014. Eulachon run timing, distribution, and spawning in the Susitna River, Study Plan Section 9.16: Initial Study Report. Susitna-Watana Hydroelectric Project, FERC No. 14241.

Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.

National Marine Fisheries Service (NMFS). 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

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Vincent-Lang, D.S., and I. Queral. 1984. Eulachon spawning in the lower Susitna River. Chapter 5 in C.C. Estes, and D.S. Vincent-Lang (eds.). Aquatic habitat and instream flow investigations, May-October 1983. Susitna Hydro aquatic studies. Report No. 3, APA document No. 1934. Anchorage: Alaska Department of Fish and Game.

Willette, T. M., and R. D. DeCino. 2023. Eulachon spawning biomass in the Susitna River, 2016. Alaska Department of Fish and Game, Fishery Data Series No. 23-16, Anchorage.

PC13

Submitted by: Corey Berg
Community of Residence: Wasilla, Alaska

Proposal 238

Oppose

Understanding boat hull designs, motor size, and knowing how to operate a boat on the Little Susitna river are big factors that the bank angler with this proposal wouldn't even know where to start. The Hull of a boat can create 80 percent or more of the wake your making. Motor size isn't going to help anything. I am a guide on the river and have ran serval types of boats and what im running puts up way less of a wake then a 16ft john boat with a 40hp.

For erosion problems I'd like to let you all know that the rivers has flooded 2 or more times last season and the after math has changed the river drastically.

In the last 3 season the little Susitna river has hit flood staged waters.

I've flown the river in our super cub during that time and it's an eye opener.

What 1 flood does to the river banks and shoreline would take a lifetime or more for boat wakes to do.

There's not enough traffic on the river anymore to even bring up a motor size restriction. From May 15th - july 15th your lucky to see 5 boaters on the river now days. Are kings are gone and know ones down there.

You have 8-10 days in august when the river gets busy for silver season. Then it fades off.

Well look at last season 2023 silver season got shit down on august 19th.

Im on the river from May till it freezes up.

My 2 cents is that a motor restriction is not going to bring our salmon back. Let's get to the real subject an quit wasting time on useless stuff.

Thanks for your time.

Proposal 238: Oppose

PC14

Submitted by: Russ Bjorn
Community of Residence: Blackfoot, Idaho

Lowering the escapement numbers does not help the King Salmon survive at all, it is wildly concerning that such method would be used, and anyone can see that it will eventually lead to extinction.

Limit commercial fishing, fore they catch numerous amounts more of the fish than the recreationalist.

Proposal 83: Support

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercially fish in Cordova, Alaska, and I support the removal of Proposition 59 and oppose Proposition 43.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

Sincerely,
David Blake
[redacted]@[redacted]
Cordova, Alaska

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

Moved to alaska 8 years ago and fell in love with the outdoors. Over those 8 years, the king salmon fishing has almost disappeared in multiple fisheries. Its ridiculous putting money ahead of the survival of a resource

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Matt Boldt
Anchorage, AK

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have fished the Kenai River since 1989 with my family. The family has owned property on the river since 1979 and they have fished it long before owning the property. I have seen the King numbers plummet over these years!

I don't know what the right answer is here, but I think the entire fishery for the Kenai Kings should be shut down until the numbers actually show they are returning. Be PROACTIVE and not REACTIVE. The actual number of guides on this river should have been limited years ago and to be actual AK state residents to be a guide for these fish. I am hopeful, but not optimistic the Kings will ever return to the numbers and sizes from the good ol days. I know a complete shut down to fish for kings impacts many who depend on the fisheries for their livelihood, but this is about the KINGS and not about ones pocket book at this moment in time. Do what is right for the fish and not the pocket book. Not a well liked opinion, but you asked for mine and I am happy to share it with you all. Thank you again for your time and good luck with the tough decisions ahead of you! Doing what is right is hard and not what is liked.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

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Sincerely,

Penny Booher
Chugiak, AK

Submitted by: John Bottari
Community of Residence: Houston Ak

Proposal 238

Hp restriction will not help the decline of river bank erosion. Maintained shoreline with zone fenced area will help the foot traffic also possible trail extension access to more avl access for bank anglers

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman from Wasilla, Alaska. I started gill netting in PWS in 2006 and hope to continue for several more years. This will be my major source of income.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Robert Bottoms
[redacted]@[redacted]
Wasilla, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, commercial, and sport fisheries, as well as seafood processing, in Cordova, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Bret Bradford
[redacted]@[redacted]
Cordova, Alaska

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial fish in Sitka, Alaska. My commercial fishing business and livelihood would not be a success without the hatcheries. The majority of the fish that I catch are hatchery produced. Many of the fishing communities rely on those fish for the majority of our income.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Joshua Brandenburg
[redacted]
Sitka, Alaska

February 12, 2024

Dear Chairman Wood and Board of Fisheries members:

I want to thank the Board members for their time and service. My family really enjoys fishing to spend time together and salmon is a healthy part of our diet. I hope we protect the resource for generations to come.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

KEVIN BRANSON
Soldotna, AK

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I’m part of the subsistence, commercial, sport, and personal use fisheries in Petersburg, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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Sincerely,
Jared Bright
[redacted]@[redacted]
Petersburg, Alaska

Submitted by: Mike Brown
Community of Residence: Anchorage, AK

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The angers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

February 09, 2024

Dear Chairman Wood and Board of Fisheries members:

I've lived in Alaska all my life and have fished the Cook Inlet watershed for salmon and trout. Raised by my dad getting out to the rivers from the 1960's, and now I do the same with my children.
An important dialog is who owns the fish? Who has the right to the fish? Should some get more than others?
Do commercial fishing operations have a "right" to future fish catches? No
And sport fishermen should be allowed a greater catch than they have been given and commercial fishermen less.
The Alaska Constitution is all about protecting our natural resources and allowing balanced harvests. But the environment comes first. No harvests or bycatch if its damaging.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

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Sincerely,

Kevin Brownsberger
Anchorage, AK

James R. Burton
F/V Cricket
PO [redacted]
Cordova, Alaska [redacted]

January 30th, 2024

John Wood, Chair
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Public Comments for LCI Proposals

Dear Mr. Chair and Board of Fisheries Members, I am a third generation Fisherman from Cordova, Alaska. I have fished for herring, salmon, crab and ground fish from Southeast Alaska to the Bering Sea for the majority of my life. I have been a sport and subsistence user for fish and game resources in Alaska for all of my life. I have served as a Fish and Wildlife Aide and an Alaska State Trooper in the Division of Fish and Wildlife Protection with duty stations in Kodiak, Fairbanks, Sitka and Anchorage. I served the community of Cordova, seated for two terms on Cordova City Council in addition to other various roles including the Harbor Commission and Health Services Board.

I am married and the father of four children. My oldest daughter has been fishing with me for 5 years as a full time crewman, and participates in the multiple fisheries. She is an up and coming 4th generation fisherman, recently purchasing her first permit. Commercial Fishing is critical to my family, not only as income, but a skill and tradition to be passed down. The idea that the commercial fishing industry would be willing to sacrifice the future of our fisheries for a fish ticket today couldn't be further from the truth. We are not only fishermen, but stewards of the resource with the goal to pass this industry down to the next generation. I have every intention to introduce the rest of my children to this life in hopes that they will someday have an opportunity to feed the world.

I urge you to reject Proposal 43 and all similarly worded proposals and offer the following personal comments -

Proposal 43 essentially states that in 2000, an agreement was made to reduce hatchery egg takes for pink salmon to 25% of the year 2000 numbers.

For starters, the language of the proposal is flawed from the get go. The proposal states: ***Reduce hatchery production to 25% of the year 2000 production as promised in 2000.***

Later, the language in the proposal states: ***The hatchery management met with the Governor and proffered that if the Board would not take up the proposal they would reduce their production by 25%.***

Which is it? Reduce Hatchery production in Alaska to 25% of the year 2000 egg take numbers, or reduce the 2000 egg take numbers by 25%. That's a MASSIVE difference.

Further, even if the Board of Fisheries has the authority to alter or regulate egg take numbers, it circumvents a larger process by which these numbers are arrived at - utilizing the best available science. This proposal suggests that the Board, and every stakeholder in the industry, simply agree to this reduction that is the result of an advisory committee proposal in a community with 32 residents (in the year 2000). Essentially 0.005 percent of the Alaska population of 627,963 at the time. Not that every Alaskan doesn't matter, they most certainly do, but I would suggest that the 2000 proposal was not indicative of the general wishes of Alaska - and it is most certainly outdated 23 years later. You, and WE should not be beholden to this argument generations of Alaskans later.

Having said that, proposal 43 suggests that hatchery-produced salmon compete with wild salmon for food and that as a result, ocean productivity is low. If this is true, I ask how have we seen - in the last ten years - some of the largest sockeye and pink salmon returns (sometimes simultaneously) in Alaska? How do we explain the last handful of record-breaking Bristol Bay returns that occurred at the same time that North Pacific aquaculture productions were at their current and probably record levels if you consider Russia and Asian hatchery production? Perhaps Bristol Bay sees record sockeye returns because they don't have sport fishermen stomping in and around their spawning grounds to the extent that the Chitina, Copper, Mat-Su and Kenai region do?

Continuing that thought, Russia produces pink salmon at a rate that is greater than 2:1 for Alaska. It's unclear what the split is between wild production and hatchery, but the information I have suggests it's at least 50% hatchery production. What number of eggs that takes and how many fry are released into the North Pacific Ocean I don't think we'll ever know. Which brings me to my next question for the Board:

If we accept that proposal 43 is completely factual, and we accept the correlation = causation argument regarding hatchery vs. wild salmon, food supply, etc… then: Why is the onus placed on Alaska hatcheries to bear the entire burden of the North Pacific? Salmon fry release into the ocean is in the ***billions*** yet this proposal takes zero consideration into the fact that this is a multinational industry, of which the State of Alaska is honestly ***at least*** a very distant second - to other countries over which the BOF has no control or jurisdiction.

Those arguments aside, I do not see any evidence presented in Proposal 43 to effectively quantify what benefit wild salmon would see, given a significant reduction in hatchery salmon. The lack of quantifiable, defensible data is arguably the biggest concern with this proposal. Rather than rooted in science, it essentially says the BOF needs to modify hatchery salmon production because "a long time ago those guys said they would and they didn't." As a parent, the argument feels a lot like one I'd hear from my preschooler and not something I would use to

determine the economic fallout of such a decision on the entire State of Alaska and its fishing industry.

Thank you for your time and dedication to this process.

Sincerely,

James R. Burton

PC27

Submitted by: Dusty Byrd
Community of Residence: Cooper Landing Alaska

I support proposal 167 to protect coho and resident species.

Proposal 167: Support

PC28

Submitted by: Bari Cabana
Community of Residence: Girdwood

No on 43 and please look into the absolute lack of hatchery fish effecting wildstocks. The facts are just not there and every single board meeting the same people put out the same proposals to do away with hatcheries for no reason. It is a waste of everyones time and energies and there are much more important issues to address...thank you

Proposal 43: Oppose

PC29

Submitted by: Jeremy Cabana
Community of Residence: Homer, Ak

Hello good people of the board of fish.

No on 43

My name is Jeremy Cabana and I've been I've been involved with commercial fishing since 1985. On my father's boat since I was 5. I was at one time the youngest permit holder in the state at 12 as my father took me to court with him to get the law about permit holders changed to allow you to put a permit in your child's name as long as they were an integral part of your fishing operation. Needless to say running a skiff from the age of 12 till 29 was good introduction to how my life was going to proceed.

Folks, I am writing to you today to defend my job and my lifestyle and heck the way of life that I'm the third generation of and I'm currently raising the fourth generation of. This proposal is absolutely ridiculous considering how much commercial salmon fishing brings in to not only the state in the form of taxes and revenue from licensing and permits but also the freedom that a terrific job offers. We also have the thousands of families that are using their salmon income to get goods and services in every single town in the state. I'm honestly getting tired of this special interest dark money groups coming in and trying to upend my way of life. I'm a provider, I'm a tax payer, I'm a noble human being who is fighting against the might ocean to make sure that the normal humans who dwell on land and can't comprehend the sacrifices and suffering that we go through to provide this country with some of the best seafood in the world and I've got to worry on top of this incredible weight of the dangers I face every day on the sea that some pencil neck city slicker who couldn't last a week doing our jobs has the audacity to propose that maybe we don't have as much seafood for the country and that the price of fish will be unattainable for most Americans. Now I'm just wondering what these people actually produce that is helpful to this great country. They can write stuff but most people can do that, so far they are worthless and not worth listening to. Are they capable of feeding millions of people with a delicious and sustainable seafood that is so good for you that it will literally extend your life???

No they are not. As far as I can tell they are completely worthless if we are judging them on their actions pertaining to national security and national sovereignty. I create food for Americans. We are as valuable as the

farmers who also produce food and security for our nation. The fact that you are considering the idea of less fish is incomprehensible especially given the current global threats to our country and looking at how the situation in Ukraine has affected the wheat harvest and distribution. Whenever you listen to people who don't add to the greatness of this state or country it makes us weaker and the idea that we should lower our ability to enhance our natural runs is ridiculous. I mean it's comical to think that we can control the natural ability of salmon and their ability to make more of themselves. Heck just last year we were hearing that salmon were making the way up into the Arctic Ocean. It's similar to the natural migration that occurred long before the science behind it was well known. The salmon has spawned further and further up the west coast in a natural progression and they will do that until the bitter end. I simply cannot comprehend the stupidity that would bring someone to believe that the additional salmon that are being produced are harmful in a way that would mandate the reduction of their numbers. They obviously don't have any connection whatsoever with the ocean and it's mysterious ways. I've spent 38 summers of my life on the water of lower Cook Inlet and prince William sound. I have seen things that have changed me. I have harvested 10's of millions of pounds of salmon. I have paid hundreds of thousands of dollars in taxes. I'm the ideal human just from a productivity standpoint and yet some chuckle head thinks that they know better than the people who are actually doing the work. They are worthless and don't deserve to be heard, certainly not by the board of fish. Tens of thousands of Alaskans benefit because of the enhanced runs of salmon not to mention the tens of thousands of people who come from around the world to visit us. Those Alaskans who have built their lives around harvesting salmon are a tough group. We don't have enough money to spend on people advocating for us and it's problematic because we don't want a lot of attention. We want to kill fish and make some money. That's it. That's what drives us. I'm sure the people who hate salmon and the good stuff that comes with it are sad, hateful people who don't get to have a job they love. They are angry bitter people who want to see the entire country suffer because they don't know a single thing about the mighty Pacific Ocean. They clearly hate America. That's the only reason I can wrap my head around. Why else would you want to have less salmon in your diet and the ocean? Because you hate American food and Americans having access to fresh seafood without preservatives and food coloring and chemicals like farmed salmon.

I'm sick thinking that people want to destroy our way of life. We've been doing this for decades and now all of a sudden we're ruining this snowflakes false claims about the ocean. The ocean is fine, the salmon are fine. The asshole who wrote this proposal is not fine. I'd imagine some sort of mental health issue or possibly a stroke that destroyed their ability for critical thought. No reason why we don't need more fish. That's the real proposal that we need. Double production of the enhanced salmon runs. I am still waiting for someone to come help us after the Russians destroyed the salmon market this last August. The fishing industry was hit hard by the slashing of the salmon prices. Devastating for the state and local economies. Devastating for the thousands of people who depend on the income.

So sorry for rambling, I kill fish for a living and take great pride in my job and the value that it brings to my country. I'm deeply offended that someone would want to destroy my way of life and my ability to provide for my family. I've worked hard my entire life, Literally and to think that some buttery soft handed man would have the audacity to tell me, a man with rough hands to work less and make less is beyond my comprehension. I thought this was America.

I imagine that they speak like this. "Hey you, hard working real man or woman who battles the ocean to provide great food for this country and pay more in taxes than I make. please don't mind me ruining your way of life. I have no real life skill beyond being a professional worthless idiot. I don't understand how the ocean works or how every single year the fish return in a cycle as old as time. I don't love this country and I love the enemies of America, like Russia and North Korea. I hate when hardworking Americans provide delicious, affordable, nutritious food for their countrymen."

I have no respect for anyone who tries to take away my ability to provide for my family and my country. This is a noble duty that often results in death and disability and I don't need any bullshit from some vitamin deficient, mouth breathing, anemic, low levels of iron and calcium lame ass fake American. Honestly, this is treasonous

behavior. Trying to destroy our ability to produce something that is incredibly important and valuable for the country is borderline criminal behavior and certainly treasonous. I'm just asking that maybe we should look into their background and financial situation. Probably some payments from the kremlin in there. Why else would this even be considered other than to hurt American people and their families. We boast some of the last natural runs of salmon in the world and I'm incredibly proud of be a part of it. If we didn't have the enhanced runs of salmon I'm completely sure we'd have no runs that would still be harvestable at this time. I've fished lower Cook Inlet and I know what it's like to need those runs to be strong every year. Didn't take long before we had to add fishing in the sound to survive. Beyond the Bristol bay run we have enhanced runs around the state that provide not only the people who harvest the fish for a living but also those who DON'T actually pay for the enhanced fish that are created. As far as I know not one dollar from the sport fishing actually pays for any hatchery fish. Maybe anchorage but I'm not sure. Regardless we (commercial fishermen) are such an important part of the Alaskan economy that it's completely ridiculous that we are considering that lowering production to the level that we had 25 years ago. We need to make more. More fish means more jobs, more jobs means more money for families.The best thing to do is disregard this nonsense proposal and do what is best for America.

Thank you for listening to my opinion.

Sincerely Jeremy Cabana

Proposal 43: Oppose Proposal 144: Support Proposal 145: Support

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February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I live in Girdwood, Alaska, and I'm a part of the subsistence, commercial, and sport fisheries in Whittier, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
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(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Russell Cabana
[redacted]
Girdwood/Whittier, Alaska

PC31

Submitted by: Tim Cabana
Community of Residence: Girdwood alaska

This is for those proposals to regulate hatcheries statewide. I have fished for 50 years and seen before hatcheries and after and cannot think of a single run of wildstock fish that has been negitively affect by hatcheries. Please look at the real fact and disregard the end of the world drama the anti hatchery crowd bring to the table. It is simple wrong. All natual runs in hatchery areas are as stong as ever. In prince william sound where hatcheries have been for decades we just had the largest wildstock run in history just a few years ago.

PC32

Submitted by: Debra Call
Community of Residence: Anchorage, Alaska

Proposal 217 - I support this proposal because smelt feeds the endangered species - Beluga Whale and smelt feeds the endangered Alaska wild King Salmon

Per NOAA - Management Overview. All beluga whales are protected under the Marine Mammal Protection Act, with the Sakhalin Bay-Nikolaya Bay-Amur River stock and the Cook Inlet stock designated as depleted. The Cook Inlet beluga whale population is listed as endangered under the Endangered Species Act.

Per the Wild Fish Conservancy's 68-page petition. (1/11/24) says that the king salmon, also known as chinook, are threatened by climate change and competition from hatchery-raised fish, and that existing state and federal management are failing to stem their decline.

Over 211 TONS of SMELT were commercially taken from the feeding area at the Susitna River. A study needs to be done to ascertain healthy numbers of smelt to sustainably feed the endangered king salmon and endangered beluga whale disappear from Cook Inlet.

The 7 smelt harvesters do not take priority over the need to save our Cook Inlet endangered king salmon and endangered beluga whale. There needs to be a priority to pause to study the smelt numbers and ensure a healthy population is maintaioned.

Proposal 131: Support Proposal 142: Support Proposal 217: Support

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February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, commercial, and sport fisheries in Sitka, and I'm a salmon hatchery employee.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Casey Campbell
[redacted]@[redacted]
Sitka, Alaska

Submitted by: Ron Carmon
Community of Residence: Ik enai

All1245678 proposals.

Notice , have you ever noticed.

The cookinlet fish !

Has been givened to the wo r ld for sport fishing.

And now " guides equal oppertunities.

After 30 years, guides fish this cookinlet fish resourse for free.

Guides net income, 100 grand a year.

Cities of kenai nets 30 million a year

Dip net fisheries, 540 million dollars of fish. At 12.99 lb.

And allways, allways adfg comes after

The commerical fishery.

Commerical paid there way,

So many years now.

Commerical fishing has skin the game.

Guides are funded, by the 20000 box stores.

No skin in the game.

And not even a fishing license.

And the adfg goes to, bof every day .

To rewrite, laws, ro change wording.

To invent new stragities.

To make bof rules changes .

Then just before, fishing starts.

There this new bof meeting.

That the enforcement adfg .

That says we all have ro make sure.

That every body has equal chances to fish.

Except!

The cookinlet fisherman.

Here we fo again .

Adfg [redacted] has to make sure.

Guides that fish for free, without a license.

In anchorage or the world.

Is asking the board of fish, to cut the cookinlet fishery.

Even more.

Board of fish.

Lets go back to 1901 rules for cookinlet.

1 mile from the mouth too a 120 miles south.

On the streams in cookinlet.

Adfg currently working , on givingthe spoils

Of left over fish to the kodiak seine fishery.

So go back to the 1901 rules.

Look, what you reduced the commerical fishery too.

Eez zone.

You kidden me!

6.4 million guides, at 1760 for a license.

Wavied for 30 years.

By adfg.

Every year, loss of profit.

What does it take.

Not to be dumb.

Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose

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February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am a long time commercial fisherman and subsistence user on the Copper River Flats and the Prince William Sound. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

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(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Douglas Carroll
[redacted]
Cordova, Alaska

PC36

Submitted by: Heath Carroll
Community of Residence: Cooper Landing

Proposal 167 - protect coho stocks and protect trophy resident species

Proposal 167: Support

PC37

Submitted by: Brad Carver
Community of Residence: Soldotna, AK

Please consider supporting proposal 83 in some form. It offers significant protection, especially to hens, for Kenai River King salmon. This proposal is probably 20 years too late , but that doesn't mean that we can't try to do what we can to offer protection to what we have left. More eggs in the gravel would be a good start, and that is what this proposal would provide.

Sincerely Brad Carver. Biologist, former ADFG employee, former Kenai River guide, former vice chairman Kenai Area Fishermans Coalition, and 35 plus year year private Kenai River fisherman.

Proposal 83: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska now for almost 15 years. I have fished all over the state and fish primarily to feed my family. I do fish for regular enjoyment as well since Alaska has some of the most pristine waters on the earth. It is unfortunate that the fishery management plan is NOT aligned to conservation. Its pretty clear that king escapement is a low priority to the board since the commercial fleet is allowed to stay open and in river EO's are tailored in an effort to keep the fleet fishing. I have NEVER had the opportunity to harvest a king salmon from the Kenai river since abundance has been so poor the entire time I've lived here. I can't recall of a single season where some limitation was not put in place on sport fishers that was just strict enough to let the commercial fleet continue to fish. I hope you do better in the future.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Chris Chartier
Ft greely, AK

Submitted by: David Childers
Community of Residence: Sterling, AK

I am concerned about the effects of the brine solution sprayed on the roads leeching into the waters and impacting the salmon stocks.

Chugach
ALASKA CORPORATION

February 12, 2024

Members of the Board of Fisheries,

Chugach Alaska Corporation (CAC) is one of twelve land-based Alaska Native Regional Corporations formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA), 43 U.S.C. 1601. The Indian Self- Determination and Education Assistance Act of 1975 (ISDEAA), includes ANCSA Corporation in definition of the "the recognized governing body of an Indian tribe". Today, Congress regularly utilizes the ISDEAA definition of tribe to use ANCSA Corporations as a conduit for Tribal funding and programs in Alaska and in service of Alaska Native people. This action is entirely consistent with that quasi-governmental role of ANCSA Corporations. Alaska's unique model of indigenous self-determination involves Alaska Native tribes, ANCSA Corporations, and other Native organizations, that work together to serve, represent and advance the interests of Alaska Native people, including providing land stewardship, critical services, and benefits to Alaska Native people.

CAC was incorporated on June 23, 1972, and is owned by a diverse group of 2,900+ shareholders. CAC's regional boundaries spans nearly 5,000 miles of Alaska's coastline in the lower Cook Inlet and the Prince William Sound. Under ANCSA, CAC was granted 928,000 acres; this included 550,000 acres of subsurface and 378,000 acres of full fee estate. Within CAC's regional boundary are villages and communities recognized under ANCSA. The communities of Seward, Whittier, and Valdez are located within the CAC region. There are five recognized tribal villages in the CAC region: Chenega, Eyak (Cordova), Nanwalek (English Bay), Port Graham, and Tatitlek. CAC prioritizes the use of its land by shareholders and descendants for cultural, subsistence, recreational and economic activities. CAC may also provide access opportunities to the general public.

We write to you on behalf of Chugach Alaska Corporation to express our strong opposition to Proposal 43, and would like to outline the compelling reasons why we believe it is critical to stand against this proposal.

Hatchery programs have been a cornerstone of Alaska's fisheries for nearly five decades, playing a vital role in supporting our communities, economies, and the sustainability of our salmon runs. These programs provide jobs, income, and economic output in coastal communities, contributing significantly to local economies. Additionally, they benefit many user groups, including subsistence, personal use, sport, and commercial fishermen, ensuring salmon accessibility and abundance for everyone.

Moreover, hatcheries are crucial in reducing pressure on wild salmon stocks, especially during years of lower abundance, thereby safeguarding wild salmon runs. The responsible management of Alaska's salmon hatchery program is highly regulated and grounded in science,

Chugach
ALASKA CORPORATION

with rigorous oversight ensuring sustainable practices. Furthermore, our salmon fisheries, including hatchery-origin salmon, are consistently certified as sustainable, underscoring the responsible management of our fisheries, including hatchery contributions.

Proposal 43 seeks to significantly reduce pink salmon production, posing a threat to the balance achieved in our fisheries. A reduction of this magnitude would have far-reaching consequences on our communities, economies, and wild stocks. Instead of drastic reductions, we urge collaborative efforts between the hatchery community, the Alaska Department of Fish and Game, and industry leaders to ensure the sustainability of our salmon fisheries while addressing concerns.

In conclusion, Alaska's salmon hatchery program is a testament to responsible resource management and sustainable salmon harvests that benefit all Alaskans. Rejecting Proposal 43 and pursuing collaborative solutions will help ensure the continued prosperity of our salmon fisheries and the communities they support.

Thank you for considering our position on this matter. We look forward to working together to preserve Alaska's rich fisheries legacy.

Sincerely,

Josie Hickel, President
Chugach Alaska Corporation

CHUGACH REGIONAL RESOURCES COMMISSION

Aluutiiq Pride

Feb 12, 2024

Dear Board Members of the Board of Fisheries:

I am writing on behalf of Chugach Regional Resources Commission to oppose Proposal 43. The mission of our organization is to protect, preserve, and conserve the environment and natural resources of the seven Tribes we serve. We represent the Tribal Members of Chenega, Cordova, Nanwalek, Port Graham, Seward, Tatitlek, and Valdez. Many of our Tribal Members rely on the subsistence harvest of hatchery salmon to sustain cultural traditions and well-being. Therefore, we oppose Proposal 43 because there are many unknown consequences to our communities and their abilities to maintain enough subsistence harvest of salmon with the proposed reduction of hatchery pink salmon releases. In many of our communities, current subsistence salmon harvest levels are not as abundant as they were in the past, and any less salmon returning to our communities would be detrimental to the food security of our Tribal Members. Thus, we do not think it is a sound idea to reduce the release of hatchery pink salmon by 25%. The precedent Proposal 43 would set for other areas in Alaska causes major pause for concern as to how this proposal will have effects on fisheries across the state.

Proposal 43's proposed reduction in pink salmon production threatens to disrupt the delicate balance of our fisheries, placing the livelihoods and cultural heritage of Indigenous communities at risk. CRRC advocates for collaborative solutions with Tribes that prioritize the preservation of subsistence fisheries through scientific research that assesses the impacts of hatchery-wild introgression and abundance of hatchery pink salmon on the marine ecosystem. We need more significant evidence of the impacts of hatchery pink salmon on the marine food web and wild stocks of salmon before implementing a drastic reduction of hatchery pink salmon production.

In conclusion, our Tribal Members are reliant on the salmon that have become available for our communities from the important hatchery production of CIAA and PWSAC and their continued partnership with CRRC. We oppose Proposal 43.

Sincerely,

Best Regards,

Madeline Lee, MS
Tribal Fish Biologist
[redacted]

Submitted by: Michael Chulick
Anglers Haven Lodge LLC

Community of Residence: Kasilof, AK

See Attached. I would also like to add that I fully oppose any attempts to "save" the Kenai late run kings at the expense of the Kasilof. These rivers need to be paired as there is inadequate protection for the kings in the Kasilof from commercial interests when they are placated by allowing commercial harvest in the Kasilof districts when Kenai is restricted. Please don't damage one system while trying to fix another. For example, Prop 119 if implemented would destroy the Kasilof king fishery and negatively impact the quality of the sockeye fishery.

Proposal 1: Support With Amendments Proposal 2: Support Proposal 3: Support
Proposal 4: Support Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose
Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose
Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose
Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose
Proposal 90: Support With Amendments Proposal 91: Oppose Proposal 92: Oppose
Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Support
Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose
Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose
Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Support Proposal 108: Oppose
Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Support
Proposal 113: Oppose Proposal 141: Support Proposal 146: Support Proposal 150: Support
Proposal 153: Support Proposal 172: Support Proposal 175: Support Proposal 184: Support
Proposal 190: Support Proposal 191: Support Proposal 193: Support Proposal 199: Support
Proposal 200: Support Proposal 202: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I own and operate a fishing lodge on the Kasilof River. Our guides take guests fishing on the major rivers (Kenai and Kasilof) and the smaller rivers along the peninsula. Our livelihood is largely dependent on healthy stocks of all species of salmon, steelhead, and trout. The reduction of opportunity for king salmon fishing has hurt our lodge in multiple ways to include reduced bookings in May, June, and early July and increased pressure on the Kasilof reducing the quality of the experience for those who do choose to come here. We are also concerned about the Coho population as there has not been a significant study in recent years on prevalence of this key species. Lastly, the frequency and spacing of commercial openings for sockeye has a very negative impact on the Kasilof when left open too long or multiple days in a row essentially wiping out opportunity for recreational anglers that may only be here for a few days or a week.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye. I am also concerned about proposals that would move the commercial fishery openings later in the year to allow sockeye fishing when coho are returning. I support a late run Chinook management plan for the Kasilof river coupled with population studies.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest. While not shown as a current proposal, I do not understand why the Kasilof doesn't have similar protections as the Kenai regarding the distance commercial operations need to be away from the shore and mouth of the river. When the Kasilof zones are open for commercial operations, virtually no sockeye and therefore no kings make it into the river. This time period is when the big wild fish run in the Kasilof rather than the Crooked Creek hatchery stock.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents and our guests to harvest sockeye salmon. This is why I support Proposal 90 with modification. Rather than a single 48 hour closed window, I would modify this to having 36 hours of openings on Sunday nights, Tuesdays, and Thursdays. This would allow a continued commercial harvest with minimal impact on recreational anglers.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals. I would also support expanding this proposal to the Kasilof if data is available to support this decision.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I would also like to state that allowing excessive commercial harvest does not help the commercial fishermen as evidenced by 2023 sockeye price per pound. Limiting the commercial harvest actually ensures a better, sustainable living for commercial fishermen as the price will rise with limited supply. Conservation can be equally or more profitable if done correctly.

Sincerely,

Michael Chulick
Kasilof, AK

January 30, 2024

Dear Chairman Wood and Board of Fisheries members:

I'm a 23 year Military Retiree that retired in this great State. My wife and I fish for the relaxation and the Alaska adventure. We fish all over the Kenai Pennisula and Mat Su Valley area. Due to their declining numbers, we have not retained a Chinook Salmon since 2002 and mainly Trout and Sockeye fish.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

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The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

SHAUN CHURILLA
Eagle River, AK

Submitted by: Russell Clark
Community of Residence: Kenai, Alaska

Proposal 96-Flagged nets. I support this proposal as I fish flagged nets on the first sites North of the Kenai River starting at about 3/4 mile off of the beach. I fish 6 nets flagged in order to keep my nets from sinking in the strong tides. I have NEVER caught a king in my flagged nets. I also do not catch flounder as other traditional set nets do.

Flagged Nets is the ONLY way to fish for sockeye that will NOT catch Kings. The nets fish full depth the whole net length without creating a bag which Kings can be caught in when the tide reduces the distance between the cork line and lead line on traditional set nets.

Flagged nets do not catch as many sockeye as traditional set nets and that in itself is proof that Kings will not be caught in flagged nets.

I do not understand the BOF's reluctance to consider this method of fishing as a viable tool to keep setnetters fishing when otherwise closed. Many setnetters have fished flagged nets when one of their anchors is lost and the net flags.

I have video of fishing flagged nets successfully and implore the BOF to consider this proposal.

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 83: Oppose	Proposal 84: Support	Proposal 85: Support	Proposal 86: Support
Proposal 87: Support	Proposal 88: Oppose	Proposal 89: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 92: Support	Proposal 93: Support	Proposal 94: Support
Proposal 95: Oppose	Proposal 96: Support	Proposal 97: Support	Proposal 98: Support
Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose	Proposal 103: Support
Proposal 104: Support	Proposal 105: Support	Proposal 106: Oppose	Proposal 107: Support
Proposal 108: Support	Proposal 109: Support	Proposal 110: Oppose	Proposal 111: Oppose
Proposal 112: Oppose	Proposal 113: Support	Proposal 114: Support	Proposal 115: Oppose
Proposal 116: Support	Proposal 117: Support	Proposal 118: Support	Proposal 119: Support
Proposal 120: Support	Proposal 121: Support	Proposal 122: Support	Proposal 123: Support
Proposal 124: Support	Proposal 128: Support	Proposal 129: Support	Proposal 130: Support
Proposal 131: Support	Proposal 132: Support	Proposal 133: Support	Proposal 134: Support
Proposal 135: Oppose	Proposal 136: Support	Proposal 137: Oppose	Proposal 138: Oppose
Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Oppose	Proposal 142: Support
Proposal 143: Oppose	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Oppose	Proposal 150: Oppose
Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose
Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose	Proposal 159: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 165: Oppose	Proposal 166: Support	Proposal 167: Oppose
Proposal 168: Oppose	Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose
Proposal 173: Support	Proposal 174: Oppose	Proposal 178: Support	Proposal 205: Oppose
Proposal 206: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose
Proposal 214: Oppose	Proposal 215: Support		

Submitted by: Russell Clark
Community of Residence: Kenai, Alaska

Proposal 205 should not be considered as it proposes to permanently close a traditional fishery. This request does not consider subdistrict participation in the Northern District and each subdistrict harvests different salmon stocks. This proposal is also allocative. Emergency order management has greater flexibility to manage each subdistrict.

Proposal 206 should not be considered in its current form as again, it does not address management of commercial fishing in the Northern District on the subdistrict level. A blanket proposal that covers the whole Northern District does not allow proper management for the stocks of concern in areas that do not even contribute fish to some areas. If a cap was to be placed on the King Salmon harvest, each subdistrict should have its own cap.

Proposal 207 should not be considered as it gives false information and does not present facts. The Northern District is not currently dominating the harvest of King Salmon. Currently the Northern District is lucky to get 18 hours of fishing during the whole Northern District King openers. Often the openings occur when the tide is out and fishermen have no water on their nets. This proposal also gives suppositions of the authors belief on King mortality from catch and release and rollouts of nets. Not documented data. This proposal also promotes the consistency of the commercial King harvest when there has been no such thing as the commercial King season was closed for many years in the Northern District.

Proposal 210 should not be considered because again, it is addressing the Northern District as a whole instead of as subdistricts. To close a whole district or restrict the whole district based upon one weir location when in many parts of the Northern District, fish harvested in some subdistricts do not even go to those weirs. Emergency orders that are currently in use address these issues and should not be changed. Also there are already regulations in place that limit fishing within certain distances from androminus streams where salmon go to spawn. These setbacks are already in place for these streams.

Proposal 212 should not be considered and further net restrictions should not be put into place as the Northern District is already and has been the most restricted District in nets and fishing time until the past few years when early closures hit the Central District:. Any more restrictions to the Northern District will make it an allocative fishery catering to the sports fishery. Limiting permit holders to one net per permit does not allow commercial fishermen to pay their crew and expenses which over 90 percent of Northern District fishermen are Alaskans. If the CFEC does a feasibility study and deems that there should be gear reductions then there should be a gear reduction program and compensation per permit as is being considered in the state legislature for the ESSN fishery.

Proposal 213 should not be considered as it further restricts a traditional fishery in favor of a dipnet fishery that has recently been started. I am sure that the intention of the BOF was not to create a new fishery and user group to replace a traditional fishery. There is not any biological data to support this proposal and this proposal also limits the whole Northern District when many subdistricts do not even harvest salmon bound for the new dipnet fishery. There is already measures in place to regulate commercial fishing in the Northern District that can address each subdistrict.

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial fish in Ketchikan. I have been commercial salmon fishing every year since 1976 in southeast Alaska. Before hatcheries it was getting very hard to make a living and raise a family. Since our hatchery program has been producing fish, it has given us a chance to make a living and at the same time reduced the pressure on our wild stocks. If the hatcheries were to go away, the chaos would affect banks, grocers, fish stocks, and ultimately the entire economy of Alaska in a very negative way. I would be very careful engaging in this rabbit hole.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries

and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Russell Cockrum
[redacted]
Ketchikan, Alaska

Submitted by: Mark Cohen
Community of Residence: anchorage alaska

proposal 167 no bait middle river (skilak to moose)

I have been fishing the Kenai River since 1985 and purchased property in the middle river in 2009. In the last few years, we have noticed a significant change in silver salmon fishing. My personal observations are as follows.

1. Fishermen are targeting the spawning beds where fish school up, prep for spawning. I have observed guides and private anglers alike catching and mishandling and then releasing salmon that are not fresh enough for their liking. At times releasing as many as 10 fish to keep one. I have no idea what the mortality rate for this behavior is, but I would assume it is high.

2. The methods are changing also, boats are not anchoring or back trolling in sections of water where fresh fish are migrating through but anchoring in resting area's and targeting them with eggs and bobbers which cover hundreds of yards of river and thus keeping other fishermen from fishing waters they normally would for other species (trout and dollies). This method is particularly hard on the resident by catch (trophy trout) that are dialed in on the bait being used by the salmon anglers. I have witnessed many times, anglers both guides and private, yank a large hook out of a large trout's throat put their fingers in the gills and take a photo and then toss a bleeding trout into the river.

3. I also think that the river could go to single barbless hook which would make releasing fish much safer for the fish.

In my opinion this practice is not sustainable for salmon or trout.

For the record, I was for many years, a salmon egg fisherman for silvers, however after hooking way too many trout while salmon fishing, I have changed my methods. We have had just as much success without bait for salmon and greatly reduced hooking rainbows. I believe something must change soon to keep what happened to the kings from happening to the silvers and resident species.

Proposal 167: Support

Submitted by: William Cohen
Community of Residence: Soldotna, AK

Please do whatever you can to preserve the large Kenai Kings and Rainbow trout.

There should be no bait allowed year round above the Upper Kiley River and the rest of the river should be closed to bait until August 15 to October 31. Also the whole river should be single hook only year round, no multiple hooks ever. Fishing from an anchored vessels should be prohibited year round above the Upper Kiley River.

Guides during Sockeye season should be restricted to fishing from 5AM to 8PM and should be required to stay with their clients. No drop offs allowed.

From the mouth of Skilak Lake down any Sockeye no matter where hooked that is removed from the water must be kept and counted as part of the possession limit.

Also the seals are a problem. There are more and more in there middle river every year. They take many trout and salmon and harass them while spawning.

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 84: Oppose	Proposal 85: Oppose	Proposal 86: Oppose	Proposal 87: Oppose
Proposal 88: Oppose	Proposal 89: Oppose	Proposal 90: Support	Proposal 91: Oppose
Proposal 92: Oppose	Proposal 93: Oppose	Proposal 94: Oppose	Proposal 95: Oppose
Proposal 96: Oppose	Proposal 97: Oppose	Proposal 98: Oppose	Proposal 99: Oppose
Proposal 100: Oppose	Proposal 101: Support	Proposal 102: Oppose	Proposal 103: Oppose
Proposal 104: Oppose	Proposal 105: Oppose	Proposal 106: Support	Proposal 107: Support
Proposal 108: Oppose	Proposal 109: Oppose	Proposal 110: Oppose	Proposal 111: Oppose
Proposal 112: Support	Proposal 113: Oppose	Proposal 114: Oppose	Proposal 115: Oppose
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Oppose
Proposal 150: Support	Proposal 151: Oppose	Proposal 152: Oppose	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 165: Oppose
Proposal 166: Support	Proposal 167: Oppose	Proposal 168: Oppose	Proposal 169: Support
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 175: Support	Proposal 176: Support	Proposal 177: Support
Proposal 178: Oppose	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 182: Oppose	Proposal 183: Oppose	Proposal 188: Support	Proposal 189: Support
Proposal 190: Support	Proposal 193: Support	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 200: Support	

January 31, 2024

Dear Chairman Wood and Board of Fisheries members:

I was born and raised Alaska and have fished on the Kenai River since my youth. Since my retirement in 2016 I have lived year round on the Kenai River. I fish for pleasure and food. I own 3 boats and take family and friends out all summer on the Kenai River.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

William Cohen
Kenai, AK

Submitted by: Nancy Conklin
Community of Residence: Alexander Creek, AK

I support Proposal 231 changing the dip net dates to July17 to Aug 7 because there are few salmon running in the Susitna River between July 10 and 17. Moving the season forward a week would align better with the sockeye, pink, chum and sockeye runs.

I also support the idea presented in Proposal 229 to add either Mondays or Fridays to the season so people who can only get to the Susitna on weekends will have more than one chance to harvest the salmon.

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I have been married to a commercial salmon fisherman for 38 years and have made our living on salmon and hatcheries for that long. My children and grandchildren's children will be 3rd and 4th generation fishermen. Hatcheries have extended our seasons by at least two months. We support their contributions to all of Alaska.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Sincerely,
Marianne Connor
[redacted]
Petersburg, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial fish in Petersburg, Alaska. Since the inception of salmon hatcheries in Alaska, my salmon seasons have become longer and more stable.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
William Connor
[redacted]@[redacted]
Petersburg, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a born and raised third generation Alaskan commercial fisherman. I grew up fishing the very tail end of many Alaskan fisheries—halibut, herring, cod, king crab, opilio, Bairdi. I will probably never get another chance to fish any of those again. No matter what other fisheries I've done, though, I always come back to seining or gill netting for salmon. Invested my life into it. Bought my own permit. Built a boat and a skiff. Invested lots of money into the state and the communities. If we get rid of the hatcheries, then there is a good chance that salmon will be unsustainable also. How can we keep the next generation going? Or this generation? Extremely low prices coupled with a huge drop in volume would be a disaster, with no actual proof that hatcheries harm anything. If nothing else, they must help, evidenced by record runs in the Bay and elsewhere. They are just being attacked by some radicals that want everything their way. I strongly suggest we stop them from trying to destroy our way of life. Thank you for your time.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

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may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Rick Corazza
[redacted]
Homer/Valdez, Alaska

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

My family has been commercial fishing in Alaska since 1939 and seining for salmon in Prince William Sound since 1985. The local fishermen of PWS started the hatchery program there because many of their salmon streams were lost due to the earthquake and the sinking of the land in the Sound. In the nearly 40 years that we have seined in PWS and been part of the hatchery program we have watched its success, from helping to protect wild stocks to increasing the livelihood of everyone involved with hatcheries. Fishermen and their crews, tenders and their crews, processors and all the workers they employ, cities all over PWS and including Seward, Anchorage, Homer and even Southeast people have benefited from the hatchery programs. Several of the largest wild salmon fishery years have coincided with the largest hatchery stock years which is wonderful, and during smaller years the hatchery fish have helped to take pressure off the wild salmon, in both cases it is a win-win for fish and for people. I fully support the hatchery programs in Alaska and am thankful for the good science and stocking efforts and hard working people who participate in all aspects of the program. Many sportsmen do not know it but 72% of the price of every silver caught in PWS by sportsmen is paid for by the commercial fishermen through the hatchery project and cost recovery. It truly benefits everyone!

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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Opposition to Proposal 43:

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Sonja Corazza
[redacted]
Homer, AK

Submitted by: Aaron Corbin
Community of Residence: Hendersonville, NC

Trawler bycatch is unacceptable. In no other fishery would the amount of waste be acceptable. To see cultures that have subsisted for thousands of years be forced to stop fishing and have fish flown in from other areas is just disgusting to watch.

As a former commercial fisherman and having been raised in Alaska I see no reason that fisheries management should allow this behavior to continue.

Zero bycatch. That's how trawling should be managed. When I return home and catch salmon or halibut if I were to waste some of those fish I would face a fine for doing so yet trawlers get away with it day in and day out.

Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone. (907) 424 3447 | fax. (907) 424 3430
web. www.cdfu.org

John Wood, Chair [redacted]
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

February 4, 2024

Re: Upper Cook Inlet Proposals

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region. As you deliberate, we respectfully ask you to consider our comments:

Proposal 43 - OPPOSE
We oppose this proposal to amend the *Cook Inlet Salmon Enhancement Allocation Plan* to reduce hatchery production to 25% of the year 2000.

Hatchery Regional Planning Teams members include representatives from Alaska Department of Fish and Game and hold strong backgrounds in the science behind hatchery production, as well as a thorough understanding of local ecologies and regional fisheries. Their open public meetings include scientific reports and presentations based on the most current research available. We support this public framework and would like to see recommendations related to hatchery management to be made through RPTs who have vetted the matters.

Thank you for your time and consideration of our comments. We greatly appreciate the attention to the issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our comments, please don't hesitate to contact me.

Sincerely,

Jess Rude

Jess Rude
Executive Director

Submitted by: Andrew Couch
Community of Residence: Palmer, Alaska

People know me as Andy Couch. I've guided salmon fishing trips, launching on day trips in the Mat-Su Valley for the past 40 years, including at Little Susitna River, Deshka River, and Unit 2 streams of the Susitna Drainage between Deshka Landing and Montana Creek. I also write a weekly fishing column for the Frontiersman Newspaper, primarily during summer months. My concern is the rapidly declining sport fishing salmon harvest opportunities within Northern Cook Inlet -- including the Susitna River drainage and Little Susitna River. The two primary salmon species historically harvested from this area by the sport fishery have been coho salmon and king salmon.

At the 2020 Board of Fisheries meeting the Board adopted changes, in August, designed to pass additional salmon through the Central Inlet drift gill net fishery to provide for Northern Cook Inlet salmon escapement needs and also to [provide reasonable salmon harvest opportunities for all Northern Cook Inlet user groups. I believe, because of old gear regulations, in place since the 1970s or earlier, that most of any additional harvestable surplus coho salmon have been taken in the Northern District set net fishery, thereby denying sport, guided sport, and other inriver user groups even the reasonable level of harvest that had been experienced in the past. Since Northern District commercial harvests often occur a week or more before salmon abundances are monitored by upstream weirs, several inseason salmon escapement goal shortages, that have occurred since the 2020 Board of Fisheries Meeting, have reduced sport fishing effort, harvest opportunities, and seasonal harvests considerable more compared to the Northern District commercial fishery. Even when goal levels are later achieved during a season, the much more conservative and less efficient sport fishery harvests considerably less salmon when only a minimal number of salmon above the escapement range threshold is allowed to migrate inriver. Northern Cook Inlet is so silty from the drainage of large glacial rivers that few salmon are taken in Northern District saltwater sport fisheries -- further exacerbating the issue.

I believe that more conservative commercial stipulations within the Northern District Salmon Management Plan and the Northern District King Salmon Management would provide a better sharing of the Northern Cook Inlet harvestable salmon surplus, throughout the entire run(s), and should also greatly reduce the amount of inseason restrictions, closures, and the threat of salmon spawning escapement shortages. Therefore, in order of priority, I support Northern District Salmon Management Plan Proposals 212, 214, 210, and 213 -- and the concepts they put forward. These proposal ideas could likely help restore some Northern Cook Inlet sport harvest opportunities, participation, and economic value within the first year of use.

Northern Cook Inlet king salmon stocks have been in decline since 2007, with 2023 having some of the lowest king salmon spawning escapements on record. Recent yield / harvestable surplus fish available during the past 5 years should easily qualify king salmon stocks, throughout the entire Susitna River drainage, as Stocks of Yield Concern. The

Little Susitna River king salmon stock should also have such a designation. Action I would suggest the Board should take at this meeting to address Kenai River and Northern District king salmon stock statuses. Support adoption of proposal 43 as a long overdue precautionary measure -- from an allocation standpoint nearly all directed sport, commercial, and personal use harvest of wild Upper Cook Inlet king salmon on has already Benn eliminated (and especially during the past two seasons). It is long past time to more equally address the issue of declining ocean production (a browning scientific community concern is that this decline may be partially caused by competition with hatchery pink salmon). I support Northern District King Salmon Management Plan proposals and concepts in order of priority: 207, 208, 210, 205, 206.

Consider a more reasonable sharing of salmon harvest opportunities with additional days of dip netting opportunity in Northern Cook Inlet. If Northern District commercial opportunity fished a more conservative number of nets per permit, the lower Susitna personal use fishery could have more than 6 or 7 days of harvest opportunity in an entire season. I therefore support, in order of priority Lower Susitna personal use proposals 228 (housekeeping) 229, 231, 230, 213.

Thank you for considering my thoughts, and always feel welcome to ask me questions about these Northern Cook Inlet salmon harvest opportunities that I would like to see maintained for additional generations of Alaskans to enjoy.

Proposal 1: Support	Proposal 43: Support	Proposal 137: Support	Proposal 202: Support
Proposal 205: Support	Proposal 206: Support	Proposal 207: Support	Proposal 208: Support
Proposal 210: Support	Proposal 212: Support	Proposal 213: Support	Proposal 214: Support
Proposal 228: Support	Proposal 229: Support	Proposal 230: Support	Proposal 231: Support

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I wanted to add my personal support for proposal 238. The loss of large king salmon as a proportion of the Little Susitna River king salmon spawning escapement goal is dramatic. I worked for ADF&G as a fisheries technician on the Little Susitna River for a couple summers while I was attending college. I remember doing creel census work one year where the average Little Susitna king salmon caught by the sport fishery was between 29 and 30 pounds. Contrast that to 2023 where most of the king salmon caught from my boat were less than 20 inches / less than 1 pound. I only had one king salmon in 2023 caught from my guide boat that I would estimate as over 30 lbs -- all fish were required to be released without removing them from the water.

ADF&G has a large king salmon goal at Kasilof River using Crooked Creek Weir technology. It is not rocket science and already being done here in Cook Inlet with a weir project. This should include an amendment for Deshka River as well.

Proposal 238: Support

Submitted by: Carl Coulliette
Community of Residence: Sterling, AK

Proposal #167

I've been fishing and guiding professionally on that section of river for over 20 years now. I 100% support this proposal. It is imperative that action is taken in favor of this proposal. I am deeply concerned about the longevity of the silver salmon population. Further more, the amount of pressure that this section of river is experiencing the past few years is detrimental to this particular fishery. It is my opinion that this entire section in said proposal should be thoroughly and thoughtfully reviewed. I am in support of making it fly fishy only and stricter catch and release policies should be implemented.

Proposal 167: Support

11-6-2023

Alaska Department of Fish and Game
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Reference: 2023-2024 Board of Fisheries meeting

Subject: **Proposal 200 (enclosed)** seeking to close the Kasilof June 15-24 personal use gill net fishery.

To: Board members,

The author of this proposal sums up his recommendation by stating: **This is not equitable for all other user groups and has a negative impact on the declining King Salmon stocks**". The board should strongly reject this and similar proposals for their divisive language, lack of credible evidence and non-adherence to the management principles governing sustainability yield. Kenai king salmon stocks are on the decline and everyone is aware of the combative and competitive battle between the sports and commercial fishery groups. But sport fishing guides appear to be frustrated with targeted closures and now seek to invoke **diversity and equity as a non-scientific argument** to close down an Alaskans only-family based fishery. Personal use fisheries are non-commercial and should not become a political target when not supported by ADF&G guidelines ensuring that stocks are harvested at sustainable levels.

Per ADF&G's historical records, families have harvested salmon as a food source through subsistence and personal use regulations since 1982 when river guides were few and commercial fishermen were the dominant players. But, just because sport fishing and commercial guide numbers have increased and placed more demand on salmon stocks doesn't change the original premise on how or why personal use guidelines were developed. Alaskan families were to be allowed access to traditional salmon stocks to meet a traditional source of food. The Kasilof River personal gillnet fishery is implemented with nets that are spaced 100' apart, are confined to 1 mile N and S of the river mouth and is open for only 10 days prior to the opening of the Kasilof River dip net periods. It's mostly a family affair spread out over 2 miles of beach and avoids the combative crowds so prevalent during the dip net periods.

In 1996, Cook Inlet was closed to subsistence fishing and replaced with the current Kenai/Kasilof dip netting/set gillnet regulations under personal use guidelines. New regulations dictate "in-season management" allowing the fisheries to be closed if projected minimum sockeye or king salmon escapement goals will not be met. Nothing in proposal 200 supports any argument that the set gillnet fishery has been detrimental to the sustainable yield of either species or more specifically affects king salmon returning to both the Kasilof and Kenai rivers. Except for the 23 season, when the fishery was closed, gillnets only accounted for about 12% of the total personal use harvest each year on the Kasilof. King salmon numbers were reported as minimal with the majority targeting and returning to the Kasilof River and not the Kenai River. In addition, as outlined below, sockeye salmon escapement in the Kasilof

River was significantly over its escapement goals with more than 900,000 fish for both the 22 and 23 seasons.

Date 2023	Count 2023	Cumulative 2023	Cumulative 2022	Cumulative 2021	Cumulative 2020

Date 2023	Count 2023	Cumulative 2023	Cumulative 2022	Cumulative 2021	Cumulative 2020	Cumulative 2019	Notes for 2023
Aug-27	2,358	932,896	971,604	521,859	545,654	378,416	North Bank 1,398; South Bank 960; Final Count
Aug-26	5,052	930,538	971,604	521,859	545,654	378,416	North Bank 3,018; South Bank 2,034

Chinook Salmon Harvest * numbers do not distinguish between kings returning to the Kasilof River as either hatchery, wild or incidental Kenai Kings

YEAR	Fish Creek Dip Net	Kasilof River Gillnet	Kasilof River Dip Net	Kenai River Dip Net
2022	0	19	21	13
2021	3	94	9	50

I don't recall any language in the constitution or ADF&G regulations determining opening and closing access to salmon stocks based on equity, but considerable language on research and in season management to ensure stocks are harvested at sustainable levels. Set gillnet hours were reduced in 2021 and 2022 and completely closed in 2023 denying Alaskan families access to a traditional food source since the early 80's. It was strictly political and never justified under sustainable yield guidelines. The idea that these families should discard their gill net gear, purchase dip nets and stand shoulder to shoulder with other dip netters may not be a viable alternative. Families with elders and children who normally assist in hauling in nets and removing fish from the nets may not transition or participate easily into dip net fishery methods.

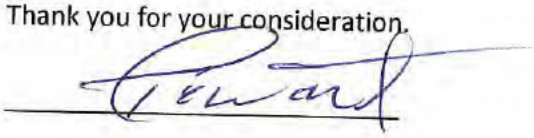
Social justice solutions are not practical for "in season management decisions" and definitely not defined under sustainable yield guidelines. If the rationale outlined under proposal 200 was somehow acceptable as an alternative to existing sustainable guidelines, wouldn't it also be consistently equitable

to suggest commercial guides/set netters relocate their assets to Bristol Bay to reduce over harvesting of king salmon stocks? Hardly, as it is well documented that under-harvesting is as detrimental to sustainable yields as over-harvesting salmon stocks. **Professional management decisions should not be encumbered by equity or political decision when falling outside sustainable yield guidelines.**

No justifications for the 2023 closure were ever presented by ADF&G, but it's obvious, the 2023 closure was based solely only on political pressure from the Kenai River guides and its affiliates. Forty years of traditional access by Alaska families for a necessary food source should not have been interrupted by political whims. Furthermore, and just as significant, equity based closures will only encouraged more divisiveness between the user groups.

The numbers of Kenai River king salmon harvested by the Kasilof set gillnet fishery has had a minimal and inconsequential affect on escapement goals. Sockeye salmon escapement in the Kasilof River has exceeded its escapement goals for at least the last 5 years (see table above), with escapements in 2022 & 2023 so high that many are now concerned over impacts to future returns in this watershed. **I strongly urge the fisheries board to keep the Kasilof River personal use set gillnet fishing periods of June 15-24 in place as there is no firm scientific-evidence the minimal king salmon harvest in this fishery is having any negative impact on either Kenai or Kasilof king salmon returns into the rivers.**

Thank you for your consideration.



Terry Cowart *

[redacted]

* 55 years Alaska resident, 3 years commercial fisherman
*40 years personal use set gillnet fishing

Referenced:

PROPOSAL 200 5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Close the Kasilof personal use gillnet fishery when Kenai or Kasilof Rivers sport fisheries are closed as follows: If the Kenai River is closed to the taking of King salmon or Kasilof River is closed to harvest of Native King Salmon on June 14 the personal use gill net fishery shall also be closed June 15- June25 What is the issue you would like the board to address and why? Closure of personal use gill net fishery June 15-25. When Kenai River is closed to taking of King Salmon or Kasilof River is closed to harvest of native King Salmon, the personal use gill net fishery on east side beach shall be closed. There is ample opportunity to obtain personal use fish using a dipnet in the Kasilof area. If not, that dip net fishery could be expanded. This would allow the department to avoid King salmon harvest in personal use fishery while still providing opportunity with dipnets. This gill net fishery was the last fishery to be implemented in Cook Inlet around 1998, yet is the only one now allowed to harvest King Salmon. **This is not equitable for all other user groups and has a negative impact on the declining King Salmon stocks in all of Cook Inlet. PROPOSED BY: Joe Hanes (EF-F23-053)**

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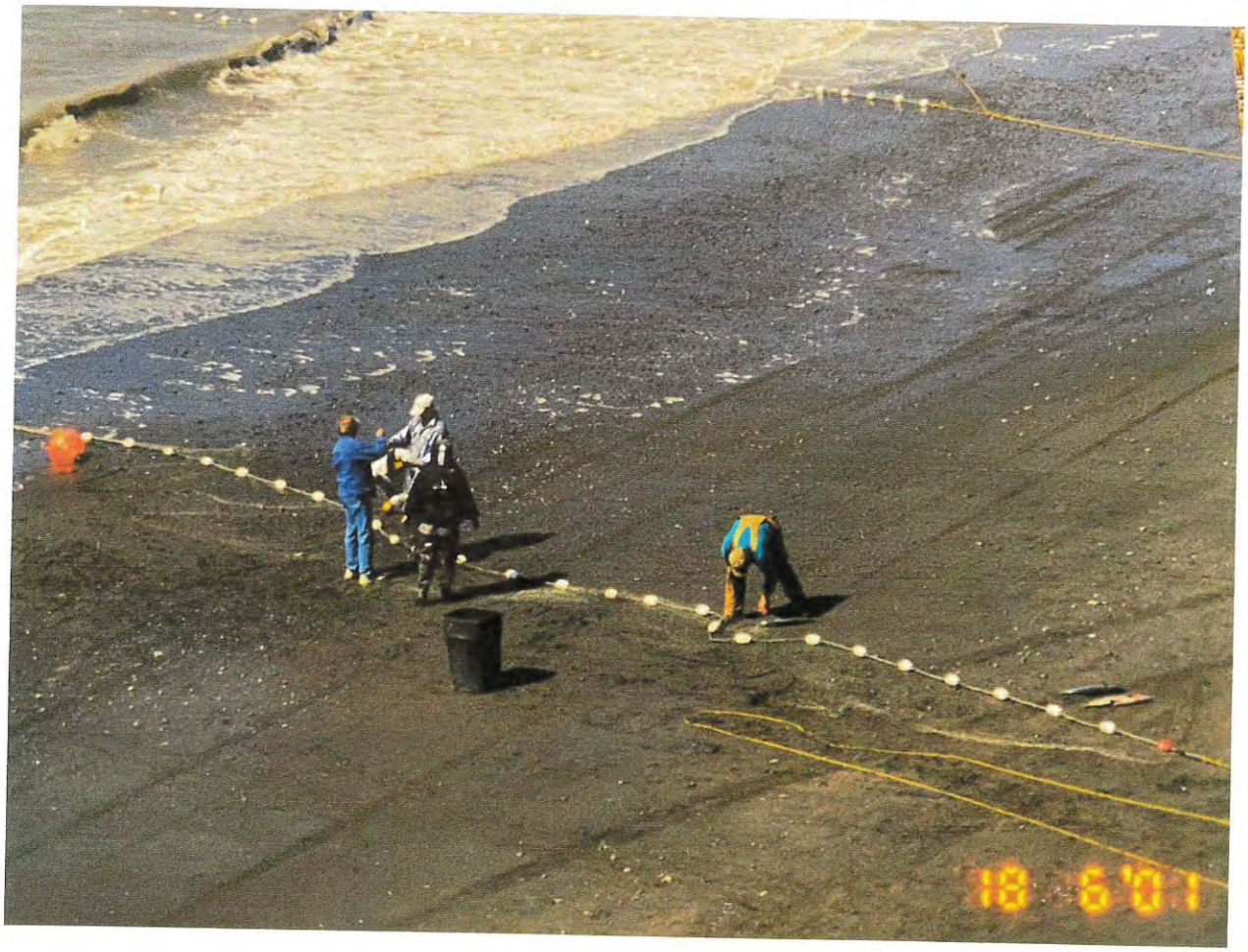
Changing from set nets to dip nets may also cause concerns over safety, close quarters & hygiene.



Submitted by: Alan Crookston
Tide Chaser Fishery

Community of Residence: Kenai, AK

Intro: Hello. My name is Alan Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Summary: Time has now shown that the Optimum Escapement Goal (OEG) set in the 2020 BOF meeting was indeed set too high, and this number is showing a positive correlation that it is unattainable. Consequently, this unattainable OEG has placed the conservation burden primarily on the shoulders of the ESSN, which has led to multiple economic disasters for the entire ESSN. Nearly every year since the 2020 OEG was set, it has been unachieved, and consequently led to economic disasters because the ESSN has essentially not been able to harvest any salmon. Our gear has been ready to go, and the crews hired and trained, only to sit on the beach year after year with no means to support family and crew.

If this OEG is not changed back to a realistic number, like a range that has worked for over 100 years, as shown as part of this historic fishery, then this ESSN family fishery will become extinct! Small businesses will collapse, and families will be starved into another sector. This fishery has successfully existed in this community for 140 plus years, with successful administrative leadership and management plans in place. There is substantial evidence showing that this has not been the case these past five years. The biological fishery is not what is broken here; but rather it is the management plan that needs some adjustments.

Furthermore, the pairings set forth in the 2020 BOF meeting have proven to be discriminatory to the ESSN. The ESSN has had essentially ZERO opportunities to harvest the abundandant sockeye, while all of the other user groups have been liberalized to harvest sockeye. We are simply asking for equity with the pairings. I believe that there is an opportunity for the ESSN to harvest sockeye based on the Large King SEG (13,500 - 27,000); This is a number that can save the ESSN and still protect the Kings.

Proposals Commenting on:

I strongly oppose proposals: 90, 106, 112, 141 and 150.

I am in support of proposals: 101, 112, 141, 150, 153, 154, 156, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 193, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 102: Support
Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support	Proposal 112: Oppose
Proposal 114: Support	Proposal 116: Support	Proposal 117: Support	Proposal 119: Support
Proposal 120: Support	Proposal 128: Support	Proposal 130: Support	Proposal 133: Support
Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Support	Proposal 150: Oppose
Proposal 151: Support	Proposal 152: Support	Proposal 160: Support	Proposal 161: Support
Proposal 163: Support	Proposal 164: Support	Proposal 173: Support	Proposal 176: Support
Proposal 177: Support	Proposal 178: Support	Proposal 179: Support	Proposal 180: Support
Proposal 181: Support	Proposal 185: Support	Proposal 186: Support	Proposal 189: Support
Proposal 190: Support	Proposal 195: Support	Proposal 196: Support	Proposal 197: Support
Proposal 198: Support	Proposal 199: Support	Proposal 200: Support	Proposal 211: Support
Proposal 215: Support			

Intro: Hello. My name is Alan Ted Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Please

I strongly oppose proposals 90 and 106.

I strongly support proposal 110. Proposal 110 will catch sockeye effectively, save the ESSN fishery, and it will not catch enough Kings to matter. This proposal will work, this proposal came with two years of planning and was put together with input and collaboration of the local ADFG area biologists.

Either way, we need to be able to catch sockeye close to shore during times of abundant sockeye. Please consider adjusting the plan to save this historic set net fishery.

Thank you for your consideration about this serious matter.

Proposal 77: Support
Proposal 80: Support
Proposal 81: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support
Proposal 88: Support
Proposal 90: Oppose
Proposal 91: Support
Proposal 97: Support
Proposal 100: Support
Proposal 101: Oppose
Proposal 102: Support
Proposal 103: Support
Proposal 106: Oppose
Proposal 110: Support
Proposal 112: Oppose
Proposal 114: Support
Proposal 116: Support
Proposal 117: Support
Proposal 119: Support
Proposal 120: Support
Proposal 128: Support
Proposal 130: Support
Proposal 133: Support
Proposal 141: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 147: Support
Proposal 148: Support
Proposal 149: Support
Proposal 150: Oppose
Proposal 151: Support
Proposal 152: Support
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Proposal 160: Support
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Proposal 168: Oppose
Proposal 169: Oppose
Proposal 170: Oppose
Proposal 171: Oppose
Proposal 172: Oppose
Proposal 173: Support
Proposal 174: Oppose
Proposal 176: Support
Proposal 177: Support
Proposal 178: Support
Proposal 179: Support
Proposal 180: Support
Proposal 181: Support
Proposal 183: Oppose
Proposal 185: Support
Proposal 186: Support
Proposal 189: Support
Proposal 190: Support
Proposal 191: Oppose
Proposal 192: Oppose
Proposal 193: Oppose
Proposal 194: Oppose
Proposal 195: Support
Proposal 196: Support
Proposal 197: Support
Proposal 198: Support
Proposal 199: Support
Proposal 200: Support
Proposal 203: Oppose
Proposal 205: Oppose
Proposal 207: Oppose
Proposal 208: Oppose
Proposal 209: Oppose
Proposal 210: Oppose
Proposal 211: Support
Proposal 212: Oppose
Proposal 213: Oppose
Proposal 214: Oppose
Proposal 215: Support
Proposal 217: Oppose
Proposal 230: Oppose
Proposal 231: Oppose
Proposal 232: Oppose

PC59

Submitted by: Luke Crookston
Crookston Capitol

Community of Residence: Kenai, AK

Hello. I am Luke Crookston, I am a 4th generation set netter. I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River.

Our fish site is going out of business. Please let us fish. Every other user group gets to harvest sockeye but the ESSN. You need to put language into the plan that will force the commissioner to let us fish when the reds are running, or he will find a way to not fish us.

Also, when the reds are running we catch a very small amount of kings, you are welcome to come to our fish site any day that we fish and you can see for yourself, with your own eyes, the number of Kings that we catch, it is very small. And in close along the shore we hardly ever catch Kings....please come and see for yourselves.

Also,the Kings number still do not look good, and we haven't been fishing for many years, so we cannot be the problem.

Please let us fish close to shore when the reds are thick, or we will go out of business this year.

PC60

Submitted by: Nina Crookston
Tide Chaser Fishery LLC

Community of Residence: Kenai, AK

Hello, I married into a ESSN family 18 years ago. My husband have invested hundreds of thousands of dollars into this community and fishery, and thousands and thousands of hours. We have always hired local help and shopped at local stores and used local services as part of our business.

We wanted the fish site to be a good experience for our boys and their friends, as well as feed the world with world class protein.

Unfortunately we have never had an return on our investment, and my boys have never worked more than a few days a year fishing - if at all. We are now to a point where we are having to sell of pieces of equipment just to pay bills. If things do not change then our doors will close. The problem has not been a lack of fish, we see the sockeye swimming in droves by our beach site day after day, and week after week, only to see them go to other user groups - or wasted in overescapent. The problem has been the management plan and the administration of it.

If provisions are not put in place to allow the ESSN to harvest sockey when the reds are thick, then numerous businesses like ours will fail. I ask you to please make the adjustments that need to be made to save this historic fishery.

I strongly oppose proposals: 90 and 106

Thank you.

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support

Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Support	Proposal 150: Oppose
Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose
Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

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PC61

Submitted by: Paul Crookston
Tide Chaser Fishery

Community of Residence: Kenai, AK

Intro: Hello. My name is Paul Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Summary: Time has now shown that the Optimum Escapement Goal (OEG) set in the 2020 BOF meeting was indeed set too high, and this number is showing a positive correlation that it is unattainable. Furthermore, the amount of Kings that would be harvested between the SEG and the OEG would be statistically insignificant - meaning that it would have zero bearing on the future of the Kings.

The massive over escapement of the Reds (hundreds of thousands) is NOT statically insignificant, it is wasting precious resources and having catastrophic impact on our fishery.

Every large kicking king salmon that we have ever caught we let go. If we think that it will have a change to survive, which is often the case, then we let them go, and we have been doing this for 30 years. If we do not think that the King will survive, the we send it to the processors for harvest.

The ESSN does not target the Large King Salmon. We have historically fished for Sockeye in the Salt waters of UCI, that is 98% of our harvest.

However, there is another in-river commercial user group that fishes in the freshwater, they fish in the returning and spawning grounds of the King Salmon, and they specifically target the large Kings. They use specific gear, tackle and bate designed to kill these Kings, and they, circle and re-recycle an d recycle through their feeding holes until they are successful. That is there target! And when the gear is changed to "floss for reds" that same methods and means will also kill a King. When a King is flossed (snagged in the mouth) it usually breaks the line. Are these snaged and flossed Kings salmon surviving? The data would indicate that they are not. You cannot floss for reds without killing kings at the same time.

I would encourage the Board to seriously consider what the implications of a in river targeted King Fishery has had on the King salmon, and I would ask the BOF to please adjust the plan protect with Kings with more equity.

Furthermore, the pairings set forth in the 2020 BOF meeting have proven to be discriminatory to the ESSN. The ESSN has had essentially ZERO opportunities to harvest the abundandant sockeye, while all of the other user groups have been liberalized to harvest sockeye. We are simply asking for equity with the pairings. I believe that there is an opportunity for the ESSN to harvest sockeye based on the Large King SEG (13,500 - 27,000); This is a number that can save the ESSN and still protect the Kings.

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Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
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Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support	Proposal 178: Support
Proposal 179: Support	Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
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Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

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Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support	Proposal 178: Support
Proposal 179: Support	Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

PC62

Submitted by: Ted Crookston
Community of Residence: Kenai

I have been a setnetter in Cook Inlet 58 years - all of my adult life. I DO understand the issues.

Myth: The ESSN commercial fishing has caused the decline of UCI king salmon.

Fact: Distressed ocean conditions have caused the decline of king salmon generally throughout Alaska and the Kenai River system has been especially impacted, even further, by the strategic targeted plucking of spawning kings out of their very in-river spawning holes with near military precision.

Myth: Closing the ESSN sockeye salmon fishery is warranted and will restore the king salmon stocks.

Fact: The number of large kings harvested in the ESSN is statistically insignificant in the overall health of the king salmon stock; so, while conservation measures are warranted the complete closure of the ESSN sockeye fishery and the associated staggering loss is unfair, unwarranted and unnecessary.

Myth: There is no way to adjust and manage an ESSN sockeye fishery in these times of low king abundance so as to allow for a sustainable ESSN sockeye fishery.

Fact: There ARE IN DEED options available to adjust and manage the ESSN sockeye fishery to substantially reduce the king harvest while still allowing for some sustaining level of sockeye harvest.

I urge this Board of Fisheries, with all the faculty of my being, to engage as an entire board — utilizing all the experience and perspective available from each and every single board member to assess the options, understand the issues, listen to and comprehend the very experienced stakeholders and managers, foster an open and solution-oriented dialog so as to find a way forward to allow for a sustaining level of ESSN sockeye salmon harvest while making all reasonable efforts to conserve the king salmon stock.

If a spirit of collaboration, compromise, fairness and sound reason will prevail then a responsible wise and sustainable plan can surely be identified to enhance the rebuilding of the the king salmon stocks while also maintaining the bedrock of the historic traditional setnet fishery with its attendant community, culture and economy.

This is your charge, your obligation, your responsibility and your duty.

I look forward to meeting with all of you at the BOF meetings in Anchorage.

PC63

Submitted by: Wesley Crookston
Crookston Capitol, LLC

Community of Residence: kenai, AK

Wesley Crookston.

I am a 4th generation set net fisherman. I have fished with my great grandfather as a young child. When we fished together the fishing was really good and people where happy. When my great-grandfather died, I fished with my grandpa...this fishing was definitely less, but it was still OK. My dad has now bought the fish site from my grandpa, so now I fish with my dad... sort of... we really don't fish much. Every year get all of our gear ready to go, only to see the run go by and we go home broke and upset.

This will be the last summer that I give up my summer to fish on salamatof beach. If I cannot make any money this year, then me and my friends will have to do other work during the summer. I think my mom and dad will have to go out of business. And I need money for things like Hockey and Wrestling!

I am writing the Board of Fish asking that they make changes to the king salmon management plan, so that we can fish again.

Thank you,

I STRONGLY oppose proposals: 90 & 106

Proposal 77: Support
Proposal 80: Support
Proposal 81: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support
Proposal 88: Support
Proposal 90: Oppose
Proposal 91: Support
Proposal 97: Support
Proposal 100: Support
Proposal 101: Oppose
Proposal 102: Support
Proposal 103: Support
Proposal 106: Oppose
Proposal 110: Support
Proposal 112: Oppose
Proposal 114: Support
Proposal 116: Support
Proposal 117: Support
Proposal 119: Support
Proposal 120: Support
Proposal 128: Support
Proposal 130: Support
Proposal 133: Support
Proposal 141: Oppose
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Proposal 192: Oppose
Proposal 193: Oppose
Proposal 194: Oppose
Proposal 195: Support
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Proposal 209: Oppose
Proposal 210: Oppose
Proposal 211: Support
Proposal 212: Oppose
Proposal 213: Oppose
Proposal 214: Oppose
Proposal 215: Support
Proposal 217: Oppose
Proposal 230: Oppose
Proposal 231: Oppose
Proposal 232: Oppose

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the commercial and sport fisheries in Valdez, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Nicholas Crump
[redacted]
Valdez, AK

Submitted by: Madalynn Dabranca
Community of Residence: Kenai Alaska

Zero fishing for east side set net site 2023 all other user groups had higher limits and extended days and hours for personal use fisheries looks like totally un fair and discriminating against our East side fishery destroying our local economy the board of fisheries needs to be fair to all user groups let us fish ☹️

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Support
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Support	Proposal 81: Support
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Proposal 226: Oppose
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Proposal 254: Oppose
Proposal 255: Oppose

PC66

Submitted by: Dugan Daniels
Community of Residence: Coffman Cove, Alaska

I am a commercial fisherman as well as an avid recreational and subsistence fishermen. I am also on the board of directors for SSRAA in southern Se Alaska. With the current continuing decline orlack of opportunity and access to traditional seasons and traditional areas during the winter and spring seasons as well as the attack by WFC organization from Washington as well as the allowed bycatch of the amendment 80 fleet and the continued loss of allocation every year from the Pacific Salmon Treaty as well as the fast growing "Commercial Charter industry continuing to take more of the allocation of salmon and in turn reducing the amount and days of opportunity to make a living I feel very strongly that hatchery fish are the only fish allowing us to continue to make a living the way not only myself but every other commercial fisherman in most areas are able to stay in business. I also know from a long history of fishing that if ADFG would get onboard with the program the wild stocks of concern could be assisted in making a recovery. This would not be an option if there is no hatcheries to make it possible to increase the survival rate and in turn increase the number of fish returning to river systems which not only benefits fisheries but it benefits wildlife that have since the beginning of time depended on salmon returns are part of there annual food supply. Ias a commercial fisherman I get paid the same price for a hatchery fish as I do a wild fish. I also know that any fish is better than no fish at all. For example I grew up on the southern Oregon coast and was involved in several projects to enhance returns of salmon and personally watched it work very well and was excited to see returns and rivers with fish in them again. Then after coming to Alaska almost 40 years ago someone decided in Oregon that wild fish couldn't compete for food due to the hatchery fish (which were the same stock of fish that have always been returning to each of those rivers (stocks of salmon to each river they return to are usually slightly different from river to river and it's always been kept that way with projects I have been involved with.) now Oregon has not much if any commercial or sport opportunities to catch a salmon as in most cases Oregon discontinued salmon hatchery production on rivers south of the Columbia river and the only reason the Columbia continues to get returns and salmon is because of the hatchery programs that must continue due to man building dams and continuing to all trawl boats to due whatever they need to be able to continue the destruction of the ocean and generate tons of bycatch that is basically thrown away and wasted. To stop hatchery production in Alaska with ever increasing numbers of the Commercial Charter Industry as well as do it yourself out of state tourist fishing the only way to ensure we have fish for generations to come is with hatcheries. On my commercial side of things we keep getting cuts in opportunity and number of chinook to catch as one of the very few gear groups that is allowed to directly fish chinook salmon as the commercial charter industry is allowed to catch as many as they want well over there allocated number and in turn it comes off the number of fish my gear group is allocated. I am a long time resident of Alaska and have seen what good hatcheries can do and benefit the people of this state as well as the continuing incredibly large population of tourism growth every year that the only way to ensure that we continue to have Salmon opportunities is with hatchery fish. The only other option would be to eliminate the amendment 80 fleet's continuing destruction of the ocean with support of the federal government and unless it's witnessed personally most of the population doesn't know how bad it is for the fish of all species and the ocean sea floor. So in closing I urge you the people chosen to make the right decision to continue to allow hatchery

production and push the department of fish and game to work with hatcheries to come up with a solution to assist with specific needs of certain rivers with stocks of concern to increase there survival numbers and in turn increase the number of fish returning to those systems as well as the Simplest FACT that ANY SALMON is better than NO SALMON AT ALL as all people in Alaska one way or another need salmon to survive weather they realize it or not. So please continue to support hatcheries to ensure fish for generations to come.

Thank You, Dugan Daniels

PC67

Submitted by: Brian Davenport
Community of Residence: Anchorage, ak

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The angers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

January 29, 2024

Dear Chairman Wood and Board of Fisheries members:

I came to Alaska from Florida with the military - once I discovered “Alaska fishing” I am home. I primarily fish, and dip, the Kenai but love to fish Cook Inlet too.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I also support guides that guide clients for personal use (dipnetting) MUST be Alaska residents. This should be included in the personal use section of the sportfishing regulations.

Sincerely,

Jennifer Davis
Anchorage, AK

To whom it may concern at the Board of Fisheries Management

Upper Cook Inlet, East Side Set Net fisheries

I had the pleasure, and some times pain, of joining my family on my parents set net site to fish for sockeye salmon in the 80's, 90's and some of the 2000's. This experience is the touchstone of my life and my many future successes.

The experience of working with family, and hired help, at such a challenging and demanding job has molded my work ethic, my patience, my skill sets, and my family values. I know it affected all the people who were lucky enough and determined enough to take part in the fishery.

There are very few careers, or jobs, that teach the personal strength, power and humility that commercial setnet fishing does. All fishing types really, but we are talking about east side set net fishing. I know many youths, you do too, now who will not drop their phone to take part in life or work. This profession, for the ones who choose to continue to take the risks this work requires, this work will create better humans, people who understand safety, weather, family, commitment, risk, compromise, determination, patience, overcoming fear, and enjoying success.

On the Frostad site we worked side by side, women, men, children, teens, and the locals we employed through the years. I learned from my step father, his uncle, mother, my grandfather for a while, and the neighboring crews, fathers, and mothers.

The thought that somehow these 100 families' livelihoods, history, and culture will be scarified for the benefit of a few others is a sacrilege, and the people who make up the State of Alaska should never agree to it. What brings people to live and thrive in Alaska? Determination, hard work, history and a respect for the culture of the locals, that is "who" Alaska is. Canceling the future of this fishery will not save the fish, we need to work together to harvest responsibly, through all fisheries. We need more aquaculture and to share the resource more fairly than we are now.

I adamantly disagree with any more disruption of this fishing area. The families who choose to continue fishing the east side set nets are an Alaskan treasure. They should be given a chance to continue to fish and thrive.

Lisa Davis

Submitted by: Peter DeLuca
Community of Residence: Kasilof, Alaska

The state management of Kenai River King salmon needs to go forward with similar restrictions as put in place during the 2023 Kenai River sport fishing/commercial set net fishery until these stocks of Kenai River Kings increases to normal levels. (What Ever the Cost) The Kenai River is now being exploited by guides dropping off Sockeye sport fisherman on the banks of the river to catch their limits without supervision. Sometimes leaving trash and toilet paper behind. This also needs to be addressed as it seems to be getting out of control. It seems like the guides are just fishing the Kenai River to death without showing any responsibility. The Kasilof River is not too far behind the problems that the Kenai River is experiencing. It's not too late to move forward with more restrictions concerning the Kasilof River.

Proposal 1: Support	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Support
Proposal 43: Support	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
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Proposal 249: Support
Proposal 250: Support
Proposal 251: Support
Proposal 252: Oppose
Proposal 253: Oppose
Proposal 254: Oppose
Proposal 255: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I've been going to the Kenai River since 2005. It started off with just my son and myself. In July ,2023 we had 26 people stay at RW fishing and my wife and myself back in September. We all enjoy going to the Kenai but something needs to be done to protect the fishing especially the king salmon. I think the last time we were allowed to target kings was 2018. I'm fine with that but taking so long to truly address the issues with the kings is not acceptable. I love fishing for sockeye but it's nothing like catching a big king. The king salmon runs on the Kenai river need to get back to what they used to be so future generations can enjoy fishing for them. Last year we spent nearly $100,000 (food, lodging, guided trips, etc.)between all of us without including airfare or car rental. We are going back again this year.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

David Dias
South Lake Tahoe, CA

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

My family has owned and operated seine boats for 33 years in the Prince William Sound. I raised my two boys on our boat and they now are both captaining their own boats. We are vested in a seafood processing business. The salmon business is our livelihood. Salmon hatcheries enhance the wild stock and strengthen our fisheries. This face has been proven scientifically and statistically time and time again. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
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(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Heather Durtschi
[redacted]
Girdwood, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I live in Girdwood, and I'm a part of commercial fishing and seafood processing. I currently share ownership of two Purse Seine vessels, CFEC permits, and equipment with my two sons that grew up in a family Alaska fishing business. Both boys traveled outside to attend University before returning to reside in Alaska and continue operating the family business. We rely on hatcheries in our fishing permit area to supplement harvestable amounts of salmon. Notably, we have witnessed historical record runs of wild salmon alongside our healthy hatchery returns in the thirty plus years in business.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate

salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Michael Durtschi
[redacted]
Girdwood, Alaska

January 31, 2024

Dear Chairman Wood and Board of Fisheries members:

I have been in Alaska for 36 years and my family goes fishing every summer to help feed my family.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Deborah Eckhardt
Sterling, AK

January 30, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska for nearly 70 years and sport fished on the Kenai Peninsula since I was 8 years old. Obviously I have witnessed changes in the abundance of Salmon during my lifetime. It is imperative that all reasonable and common sense actions need to be taken now to save the King Salmon. Accordingly, I ask the Board of Fisheries to adopt proposals 90, 106, 112, 141, and 150 submitted by the Kenai River Sportfishing Association.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Thank you for your service on ;the Board of Fisheries and for your consideration of my requests in this letter.

Sincerely,

William Eckhardt
Sterling, AK

February 12, 2024

TO: Alaska Board of Fisheries
Upper Cook Inlet Finfish Meeting 2024

RE: Support for Proposal 216
Reduce the commercial smelt guideline harvest level in Upper Cook Inlet from 200 tons to 100 tons

The Environmental Investigation Agency (EIA) and its supporters greatly appreciate the opportunity to submit public comments in support of Proposal 216 entitled "*Reduce the commercial smelt guideline harvest in Upper Cook Inlet from 200 tons to 100 tons*".

The Forage Fish Management Plan (5 AAC 39.212) acknowledges the importance of forage fish, specifically including eulachon, as an essential ecosystem component to higher trophic level species. In prior Board of Fisheries discussions (e.g., the 2017 meeting) there were concerns referenced regarding how eulachon harvests may impact survival and rebuilding of endangered Cook Inlet beluga whales (CIBW). However, to date, there has been little attention, or recognition, of eulachon serving as an essential ecosystem component the Cook Inlet food web.

Eulachon are a critical prey for endangered CIBW emerging from a winter with limited food resources and entering a spring period of birthing and nursing[1]. As a distinct population segment in Upper Cook Inlet, estimates of CIBW declined 2.3% annually from 2008 to 2018, then increased less than 1%/year to 2022[2]. Through spring feeding on eulachon, CIBW can begin to rebuild their energy reserves, followed by feeding on king and coho salmon during the summer. But recent declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females.

Commercial harvests of eulachon in Upper Cook Inlet initially occurred in 1978, 1980, and 1998, with catches of 300, 4,000, and 18,900 pounds, respectively[3]. In 1998, ADF&G recommended an arbitrary 50-ton (100,000-pound) harvest limit for the Upper Cook Inlet commercial smelt fishery, resulting in a 1999 commercial harvest of 50 tons. Development of the Forage Fish Management Plan (5 AAC 39.212) closed the commercial fishery in Upper Cook Inlet from 2000 to 2004. With adoption of the Cook Inlet Smelt Fishery Management Plan (5 AAC 21.505), the commercial fishery reopened in 2005 with a 100-ton (200,000-pound) harvest limit, only hand-operated dip net as legal gear, and the intent to maintain this GHL until a general assessment of stock strength could be made. Based on a 2016 ADF&G study and a 2017 proposal, the board increased the GHL to 200 tons (400,000 pounds) in 2017.

[1] https://www.fisheries.noaa.gov/resource/document/recovery-plan-cook-inlet-beluga-whale-delphinapterus-leucas
[2] https://www.fisheries.noaa.gov/feature-story/new-abundance-estimate-endangered-cook-inlet-beluga-whales
[3] Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.

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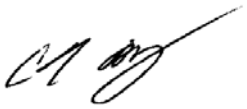
Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and ASL data are only opportunistically collected from the commercial harvest. Thus, the GHL increased from 50 to 200 tons over the past 25 years with no consistent assessment of changes in the eulachon population.

We urge you to pass Proposal #216 (changing the GHL back to the previous 100 tons level) because it follows the precautionary principle to ensure the commercial eulachon fishery's long-term sustainability while also promoting overall Cook Inlet ecosystem health and resiliency.

Sincerely,



CT Harry
Senior Ocean Policy Analyst

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Submitted by: Mel Erickson
Community of Residence: Soldotna AK

Proposal 90, I oppose

Proposal 101 I support

Proposal 106 I oppose as written

proposal 107 I support

Proposal 135 I support , i go to chinitna bay almost every day for the last 10 years , the number of salmon have fallen drastically, not even enough fish for the bears anymore

Proposal 136. i Support, teh drift boats drop thier nets along the beach and next to river mouths, bears have learned to steal the salmon from the nets.

proposal 154 i support this proposal

proposal 155, I support this proposal

proposal 157 I support this proposal

proposal 158 I support this proposal

proposal 159 i support this proposal

Proposal 160 I oppose this proposal

proposal 161 I oppose this proposal

proposal 162 i support this proposal

proposal 171 i support this proosal

proposal 172 i support this proposal

Proposal 173 i oppose this proposal as written

proposal 174 i support this proposal

proposal 175 i support this proposal

proposal 1 I oppose section H, as it does not allow for halibut fishing north of Bluff point if a king salmon is onboard.

Proposal 4 I support this proposal

Proposal 1: Support With Amendments Proposal 4: Support Proposal 90: Oppose
Proposal 101: Support Proposal 106: Support With Amendments Proposal 107: Support
Proposal 135: Support Proposal 136: Support Proposal 154: Support Proposal 155: Support
Proposal 157: Support Proposal 158: Support Proposal 159: Support Proposal 160: Oppose
Proposal 161: Oppose Proposal 162: Support Proposal 171: Support Proposal 172: Support
Proposal 173: Oppose Proposal 174: Support Proposal 175: Support

Submitted by: Francis Estalilla
Community of Residence: Aberdeen, WA

SEE ATTACHED comments re Stock of Management Concern Action Plan AND Proposal 83

Proposal 1: Support Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose
Proposal 43: Support Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose
Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose
Proposal 82: Oppose Proposal 83: Support Proposal 84: Support Proposal 85: Support
Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose
Proposal 90: Support Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose
Proposal 95: Support Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose
Proposal 99: Support Proposal 100: Oppose Proposal 101: Support Proposal 102: Oppose
Proposal 103: Support Proposal 104: Support Proposal 105: Oppose Proposal 106: Support
Proposal 107: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose
Proposal 111: Oppose Proposal 112: Support Proposal 113: Oppose Proposal 114: Oppose
Proposal 115: Oppose Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose
Proposal 119: Oppose Proposal 120: Oppose Proposal 128: Oppose Proposal 129: Oppose
Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose
Proposal 134: Oppose Proposal 136: Support Proposal 137: Support Proposal 138: Oppose
Proposal 139: Support Proposal 140: Support Proposal 141: Support Proposal 143: Oppose
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Proposal 251: Support Proposal 252: Oppose Proposal 253: Support Proposal 254: Support
Proposal 255: Oppose

PUBLIC COMMENTS FOR ALASKA BOARD OF FISHERIES
UPPER COOK INLET FINFISH
SUBMITTED BY FRANCIS V ESTALILLA, MD

STOCK OF MANAGEMENT CONCERN (SMC) ACTION PLAN FOR KENAI RIVER LATE RUN KING SALMON (KRLRKS)

A. OPTIMAL ESCAPEMENT GOAL

The OEG of 15000-30000 large king salmon MUST be upheld in the Action Plan. **The board set the current OEG in 2020 with the intent of promoting stock recovery**, well before the designation to Stock of Management Concern (SMC) happened. **Imagine the ludicrous ABSURDITY of back-pedaling on that commitment** now that KRLRKS have been officially declared a SMC.

The recent Petition to list Southern Alaska chinook salmon under the federal Endangered Species Act specifically cites stock composition trends with depletion of female chinook in the population as a compelling argument for increasing escapement goals, NOT lowering them!

Stand firm in the name of conservation for your iconic state fish. The board MUST oppose ALL proposals seeking to lower the goal or to permit the set gillnet fishery (ESSN) to operate in any capacity at projected escapements less than 15000 large king salmon

B. STATUS QUO IS NOT AN OPTION

The entire point of this Action Plan is to further reduce the exploitation of returning KRLRKS. Any proposals that promote current levels of exploitation or that intentionally increase the potential impacts on the stock should be considered DEAD ON ARRIVAL. The Staff Action Plan has "status quo" as the first option for each of the fisheries impacting KRLRKS. In case anyone forgot, status quo is what has systematically led to the SMC in the first place. The misguided harvest management of the past is in dire need of meaningful reform, particularly the sport fishery which directly targets KRLRKS. The other options listed in each table after status quo are essentially blunt weapons… management actions in permanent regulation that severely limit in-season opportunity until the conditions of SMC de-listing are satisfied. **There is a better and more reasoned middle ground between status quo and these "blunt weapon" options**. There are currently 36 proposals before you specifically regarding the management of KRLRKS. Some of them are exceptionally well thought out from a conceptual perspective and deserving of your keen attention and thoughtful consideration for inclusion in the Action Plan, particularly Proposal 83 (P83).

P83 seeks to better balance conservation and opportunity with a much more disciplined and prescriptive harvest approach than status quo, while responsibly avoiding the more ominous "blunt weapon" options presented in Staff's SMC recommendations.

The most significant features of P83 are:

1) **No fishing permitted below the lower OEG** for either the sport fishery or the ESSN's
2) Provisions that prescriptively promote **achieving a diversity of escapements throughout the full OEG range**, not just scraping for the escapement floor
3) Provisions for permitting reasonably **conservative and precautionary fishing opportunity** appropriately scaled to projected escapement levels within the OEG range.
4) Strict and intentional **conservation of nearly all females** by permanently prohibiting the retention of large king salmon in the sport fishery unless the OEG ceiling will be exceeded in-season.

This fourth key element of P83 is paramount to crafting an effective Action Plan. Stock analysis reveals that 92% of all female KRLRKS are greater than 34 inches in length. These fish MUST be conserved if you are to achieve any semblance of meaningful stock recovery. **No huevos, no pollo!** In 2017, the Board had the keen foresight to selectively conserve females in the early run stock by **prohibiting the retention of large kings unless the escapement exceeds the OEG ceiling**. The late run has never been afforded this most basic of protections. ***Now is THAT time!***

To understand just where we are today in terms of hen conservation, one must have a grasp of what used to be a healthy, productive, and highly fecund escapement. The backbone of the population was once the 4-ocean age class, and 4-ocean **females** were at one time the most numerous component of any given return of KRLRKS. Moreover, 4-ocean hens were the largest most fecund spawners; the source of the clear majority of the eggs deposited in the gravel. To get a better idea of the **MASSIVE loss of aggregate fecundity** over my fishing career on the Kenai, let's look specifically at the stock composition of 4-ocean females THEN vs NOW.

When Kenai king returns were healthy in the 1980's, a typical late run was 60K, half of them were females, and two thirds of those were 4-ocean egg wagons packing an average of 12K eggs apiece. An educated estimate of aggregate 4-ocean fecundity might look like this... 60K x 50% x 67% x 12K = **240 million eggs!** Now let's compare that to the most recent chinook life cycle with an average return of only 13K and only 21% of them 4-ocean hens. The fish are also now smaller for age, so the payload of eggs is proportionately reduced... let's say 11k (perhaps it's even less) just to be conservative. Current average fecundity each season now comes out to 13K x 0.21 x 11K = **30 million eggs**. That's an 88% reduction in fecundity just on the 4-ocean age class alone!

Take home message… **more than ever, hens matter.** You owe it to the KRLRKS stock to eliminate the purposeful retention of female kings. Short of NO FISHING, **moving the threshold to retain large kings to the OEG ceiling** is the surest way to accomplish this objective.

C. SMC DE-LISTING CRITERIA

Staff's recommended conditions for de-listing are far too lenient. Under their proposed criteria, achieving the lower goal three times in succession by even the smallest handful of fish would satisfy the conditions for de-listing. Weak… **SO WEAK!**

The whole point of establishing a goal RANGE is to achieve escapements within the FULL range of that goal, **NOT just scraping to meet the escapement floor.** A more meaningful measure of recovery (and therefore a more reasonable condition of de-listing) should strive for something greater… MUCH greater. I would propose achieving escapements within the OEG for an entire chinook life cycle (six consecutive years). If that seems too lofty, perhaps consider achieving four consecutive escapements each within a different quartile of the OEG. Either of these is far superior to the milquetoast conditional criteria proposed by staff.

D. DEFINING THE SUSTAINABLE ESCAPEMENT THRESHOLD (S.E.T.)

This is arguably the most glaring omission of the entire Action Plan. The document doesn't even get past the second page before it explains how we conveniently get out of the penalty box, yet there is ZERO mention of the specific numeric threshold for a more acute listing to Stock of Conservation Concern. This speaks to the cultural bias within the agency to maintain or resume status quo… that the listing is nothing but an inconvenient formality along the way to business as usual.

NOT SO FAST!

I would call your attention to this pertinent clause… *"performance measures appropriate for monitoring and gauging the effectiveness of the action plan that are derived from the principles and criteria contained in this policy."*

This action plan should NOT be adopted without defining specific metrics to either remove KRLRKS from the SMC list as just discussed above, or whether we need to double down for the more acutely emergent Stock of Conservation Concern. Without a numerically specific SET, it begs the question, "How would we know when we are there?"

The text string "SET" appears 50 times in Staff's SMC document… 49 out of 50 times it refers specifically to the set-gillnet fishery. Only ONCE does it refer to Sustainable Escapement Threshold (SET)… and even then, only in passing. It is NEVER numerically defined for this stock.

For the sake of full transparency and accountability, it is incumbent on this board to specifically and numerically define the SET for a Stock of Conservation in its final Action Plan. If it can't be done during this meeting, include prescriptive language in the Action Plan to Staff that demands a specific SET be defined BEFORE your next regularly scheduled meeting.

E. LOOKING BEYOND COOK INLET

It's becoming ever more clear that the perilous depletion of KRLRKS is attributable to factors FAR beyond the scope of this Upper Cook Inlet meeting. I would call your attention to this final clause… *"consider how far-reaching actions to conserve Kenai River late-run king salmon should extend within and beyond Upper Cook Inlet"*

The marine environment is where KRLRKS spend the clear majority of their lives, yet ADFG invests next to nothing in trying to understand or measure ocean impacts to KRLRKS. Oft-cited "poor ocean conditions" and climate change are frequently mentioned as convenient scapegoat factors. Realistically, there is virtually nothing that can be done to acutely manage climate change. On the other hand, the largely unrecognized reality is that **human activity is a HUGE part of "poor" ocean conditions**. In more ways than managers care to admit, **we ARE the ocean conditions.**

An unknown but likely very significant impact occurs through trawl bycatch in the Gulf of Alaska and the Bering Sea. An unknown but likely very significant impact occurs in pre-terminal intercept fisheries, namely Kodiak Island and Shelikof Strait commercial fisheries directly targeting salmon as well as trawl bycatch of chinook salmon. Mounting scientific evidence demonstrates that a surplus of hatchery-produced pink salmon is over-grazing the North Pacific, much to the detriment of species like wild coho and chinook salmon competing for the same forage base. **These factors are significantly affecting KRLRKS before they ever make it back to Cook Inlet, stunting their growth and preventing them from recruiting to the older age classes like the 4-ocean hens so desperately needed for stock recovery.** The result is ever fewer, younger, smaller, and less fecund king salmon returning to the Kenai River to sustain the stock. The stock has been so altered by human activity that it is exceedingly unlikely to vigorously rebuild itself under the status quo. **Your** Action Plan must include a genuine commitment to gain a better understanding of these ocean factors and to act on them accordingly before it's too late.

Public Comment in support of PROPOSAL 83:

I am the author of this proposal, commenting in SUPPORT of same. Allow me to clarify the rationale and intent of Proposal 83 to address the concerns that Staff has about the proposal as cited in RC2.

"If adopted, the *Kenai River Late-Run King Salmon Management Plan* would require actions to be taken by default without consideration of whether they were biologically and scientifically defensible. For example, the proposal calls for the Kenai River late-run king salmon fishery to start July 1 closed if the early-run king salmon fishery is closed on June 30 **despite the lack of correlation between early run and late run performance**."

The intent of the proposal language is two-fold… 1) **regulatory simplicity** and 2) **regulatory precaution** in the conservation of BOTH early run kings as well as late run kings. This clause only kicks in when the early run fishery has already been closed for failure to meet its escapement floor. **Staying CLOSED** until Staff can determine the in-season performance of the incoming late run in real time **is as SIMPLE as a regulation gets**. Closure of the late run fishery in this situation is highly defensible, both biologically and scientifically.

Staying closed helps to ensure every early run king remaining in the mainstem downstream of the Slikok sanctuary is NOT impacted by a July sport king fishery **for at least the first two weeks of July.** This would allow those fish to transit out of the lower river and into their respective mainstem sanctuaries or their respective tributary spawning destinations.

This would also provide a **more precautionary approach** to manage a weak late run. Despite Staff's current assertion in RC2 that there is no correlation between the performance of early and late run kings, it's OBVIOUS that kings are tanking statewide and the health of EVERY identifiable stock of wild Alaska-origin king salmon is in deep trouble. Moreover, Staff's historic management actions in the face of EVERY early run closure has resulted in pre-emptive restrictions to the late run since 2012. **Anytime the early run has been closed, Staff has pre-emptively restricted what they anticipated to be a weak late run**, citing poor chinook productivity not just in the Kenai early run, but in ALL of Cook Inlet king salmon stocks.

I would direct your attention to this excerpt from the 2012 emergency order CLOSING the early run fishery:

"Through June 18, all indices used to assess abundance of early-run king salmon in the Kenai River indicate the 2012 run is the lowest on record. Given the unprecedented low number of early-run king salmon, the department has determined that additional mortality associated with catch-and-release fishing cannot be justified. **In addition, based upon the poor performance of king salmon stocks in Cook Inlet and other areas of the state, it is likely the Kenai River late-run king salmon stock will also experience poor performance and require conservative management.** Therefore, the late-run king salmon fishery will begin without the use of bait in those waters remaining open to sport fishing for king salmon. The prohibition on the use of bait during July will reduce the harvest rate of both early- and late-run stocks that are within the open water areas.

Now look at this excerpt from the 2013 emergency order CLOSING the early run fishery:

"**Based upon the relationship between early-run king salmon abundance and late-run abundance, it is likely the Kenai River late-run will also experience below average run strength and be well below the preseason forecast.** The prohibition on the use of bait during July will reduce the harvest rate of both early- and late-run stocks."

And this from the 2018 early run closure:

"In 2018, **the king salmon runs throughout Cook Inlet have consistently and significantly underperformed ADF&G preseason expectations resulting in restrictions and closures** of inriver and marine sport fisheries. ADF&G will continue to monitor the Kenai River run as it develops and additional actions may be taken depending on the run strength."

In total, historically six early run closures since 2012 have ALL prompted Staff to implement pre-emptive restrictions on the late run fishery PRIOR to July 1. Similar language regarding the relationship between **a weak early run correlating with high probability of a weak late run** was used to justify the emergency order.

In four of those six seasons, the late run fishery would go on to full CLOSURE without achieving the lower goal**. Bottom line, Staff closed TOO LATE to save enough fish.**

The historic record is clear. Whenever the early run has been weak enough to trigger closure, pre-emptive restrictions have been required. Retrospectively, there was a 2 in 3 chance that the late run would also require closure to prevent an escapement shortfall. In the interest of a more precautionary approach, **why not just start with a late run closure?** What RC2 doesn't tell you is that NOTHING locks such a closure in stone for the rest of the season. If the kings actually materialize in fishable numbers, the fishery can simply and justifiably be re-opened by emergency order.

…

In RC2, Staff cites this additional concern about Proposal 83:

"The proposal also dictates inseason action shall occur no later than the historic quarter point (around July 16) although, for a number of reasons, inseason projections may not be a reliable basis for management actions by that point."

Staff's historical record of in-season action says otherwise. The posted record of emergency orders for the past two chinook life cycles is replete with examples of in-season action taken at or prior to the historic quarter point of king salmon passage at the sonar. It begs the question whether these emergency orders were implemented without "a reliable basis for management actions by that point."

To clarify further, the proposal states that in-season action shall be CONSIDERED no later than the quarter-point of run-timing. It doesn't necessarily obligate Staff to take any in-season action if the run is performing to expectations. It does however obligate them to formally assess the run by at least the quarter point, a time frame that permits Staff to enact any necessary "step down" measures *while there is still time to accrue sufficient savings to help achieve the escapement goal.* The point here is **to minimize the risk of acting too late**, especially in a period of

exceptionally low productivity when **king salmon runs throughout Cook Inlet have consistently and significantly underperformed ADF&G preseason expectations.** This productivity issue CANNOT be dismissed when one considers that **the three most recent complete parental broods have all FAILED to replace themselves.** If the 2024 late run forecast is realized, that will make it four successive broods in a row.

…

Lastly, permit me to address Staff's final objection to Proposal 83 in RC2:

"This complex proposal seeks very prescriptive actions that may not be appropriate or scientifically defensible."

Staff's objection here is CLEARLY subjective, and perhaps more than a bit of a deflection. Complex? Really? They will still be doing the same EXACT pre-season and in-season assessment tasks that they've always performed every year. The only difference is that it will occur within a more conservative framework, adopting new thresholds to trigger **appropriate** in-season action to avoid any unnecessary mortality of late run kings. Staff has already demonstrated its lack of discipline and restraint in prosecuting the fisheries impacting late run kings. Looking back, ask yourself if their actions have proven to be "appropriate or scientifically defensible?" If so, how is it possible that late run kings are now a Stock of Management Concern?

Status quo clearly isn't working. Proposal 83 unequivocally reduces the mortality on large late run kings to more consistently achieve a diversity of escapements within the full range of the OEG as intended, rather than just scraping for the escapement floor.

Is Proposal 83 too complex? Not really. Perhaps it could be just what the doctor ordered… prescriptive enough that it SIMPLY can't be messed up.

Submitted by: Travis Every
Community of Residence: Kenai, Alaska

Proposal 90 Oppose- Adding additional time to the closure windows for no biological or scientific based reason is purely to reduce the ability of the ESSN fishery to harvest abundant sockeye heading to the Kenai and Kasilof rivers which are consistently exceeding the upper end of the respective management targets as it is. Resulting in significant foregone harvest and unknown impact/loss of future sockeye salmon yield.

Proposal 91 Support- The implication of a politically driven OEG of 15,000, coupled with "achieved" language within the the management plan is purely to close down the ESSN fishery. There is no biological backing or scientific data supporting this number or the action of it. It is there purely to close down a fishery, while that fishery could be projecting to meet all of its scientifically backed escapement objectives. The ESSN fishery should not be the one and only user group to be closed do to an arbitrary board generated OEG.

Proposal 101 Oppose- The 600ft option is the most restrictive tool currently within the management plan. The hour exemption is in place to give the department managers the flexibility to fish on abundance, without opening the fishery with a full compliment of gear, in order to attempt to meet escapement objectives within this mixed stock fishery.

Proposal 107 Oppose- This proposal seeks to put commercial fishing gear into a location /area which could increase the catch ratio of Chinook to sockeye compared to the 600ft fishery. That makes no sense when dealing with a low abundance of chinook.

Proposal 112 Oppose- We are consistently exceeding the upper end of sockeye goals to the Kenai and Kasilof rivers with the current goal ranges. The in-river and personal use fisheries are not harvesting what they are already currently allocated within the plan. Increasing this goal does nothing but increase the amount of foregone harvest from the commercial fleet and further impact the future returns, and yields of the sockeye stocks.

Proposal 128 Support- Clear board intent was given at the 2019 BOF Statewide meeting regarding this issue on the record, "when any portion of the Kasilof section is fishing to help control escapement into the Kasilof, the North K Beach set nets within 600ft would be fishing". This proposal was passed at that BOF meeting with a vote of 6-1.

Proposal 141 Oppose- This proposal seeks to allocate sockeye salmon away from the ESSN fishery by means of an unwarranted gear reduction regardless of the size or health of a run on any given year.

Proposal 144/145 Support- The current management plan completely disregards the need to harvest surplus numbers of Pink Salmon in UCI. Under current management plans less than 2% of Pink runs are harvested. Almost a complete loss of an economic resource to foregone harvest because of an unscientific or biologically backed management plan.

Proposal 153/162 Oppose- The commercial guided in-river fisheries have ample opportunity, with the ability to fish and run their businesses basically 5 days a week starting in May through October.

Proposal 81: Support Proposal 90: Oppose Proposal 91: Support Proposal 101: Oppose
Proposal 102: Support Proposal 107: Oppose Proposal 112: Oppose Proposal 128: Support
Proposal 141: Oppose Proposal 144: Support Proposal 145: Support Proposal 153: Oppose
Proposal 162: Oppose

Submitted by: Matthew Fagnani
Community of Residence: Anchorage, Alaska

The Board of Fisheries

Please accept these comments for your upcoming February 23-March 7 meetings:

The fish stock controversy continues year after year and is a balancing act to assure the return of all salmon species to the Kenai and Kasilof rivers. It is paramount that fish returns are perpetual for future generations.

Available evidence proves shallow gillnets reduce king salmon harvest. We must change the mesh depth gillnetters use to target sockeye to protect king salmon. I support Proposal 106.

Over the last 20 years, large escapements continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunities in sport and personal-use fisheries and likely greater numbers for future years. I support Proposal 112 to increase the Kenai sockeye in river goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet needs management that shares the conservation burden among all user groups and no longer prioritizes commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch, allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase the opportunity for Alaskan residents to harvest sockeye salmon. I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy. I support decreasing time, methods and means, and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks.

Thank you for considering my comments.

Proposal 90: Support Proposal 106: Support Proposal 112: Support

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am opposed to Proposal 43. I worked in Alaska's Hatchery program from 1990 to 2018 and served as the Executive Director of CIAA from November 1996 to November 2018. During my tenure with CIAA, I was directly involved in the management of the Cook Inlet Hatchery program and always felt the Alaska Department of Fish and Game managed the program well including its priority to protect Alaska's wild salmon stocks. Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources. As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Gary Fandrei
[redacted]
Kenai, Alaska

Submitted by: Michael Fenton
Community of Residence: Sterling.AK

Dear BOF board members,

First of all I'd like to " thank you" for your service on the BOF🙏. It's can be a sometimes thankless job but much needed and appreciated by all!

My name is Mike Fenton and my brother Murray and myself are co-owners of Fenton Bros Guided Sportsfishing here on the kenai. It's crazy how time flies as we are now the " old dudes" on the river. Between the two of us we have been guiding for 80 years!(that is not a miss print😳) We've been doing for so long we took Methuselah and his family fishing back in the day!! We've seen lots of changes over the years!

I'm not going to go thru each proposal but will group a few together and hit some of the " high points" and issues I think we need to address! As you all know our fisheries has changed a ton over the years. From the " hey days" of our king fishery to the sad situation we find ourselves in now. More people/user groups chasing a shrinking resource makes for challenging management as you well know! With the reduction in our king numbers/seasons we have seen a tremendous transference of effort to our others species reds/silvers/fall fishery. This leads into one of the subjects that we feel needs to be addressed. Murray and myself spend most of our fall season fishing what we call the " middle river" it's about a 10 mile stretch from bings landing(mile marker 40) to the outlet of Skilak lake(mile marker 50). A beautiful stretch of river that we've felt very blessed to call our " office" over the years. I can confidently say we have guided this stretch more than anyone over the years. Over the last few years we have made a concerted effort to talk to many of the local private anglers along with our own customers as to what we need to do to protect our resource. Several things have consistently come up. We think it's time to make this stretch a single hook/no bait fishery! The amount of increase in effort in this stretch of river has been incredible. Another important reason is unlike the lower river where fish are " moving thru/pulsing " the middle river is a " staging" area, where fish lay/hang out until they move into a tributary or in the case of the late run silvers actually spawn! Will it make my job of " catching fish" harder? Absolutely it will but because of the exponential increases in effort it's our responsibility as stewards of our resources to do the right thing and we strongly feel it's long overdue. Along with this I think it's time to go back to a (2) fish silver limit in this stretch of river. There's poor fish see a constant barrage of bait and over the years we've gotten better at catching them so our exploitation rates have gone thru the roof! The overwhelming majority of our friends/clients/neighbors think it's time to " scale things back a bit" and make it 2 silvers ,no bait. While I'm on this subject there's another " situation" that has drastically changed the last few years. Seals!!! The population of seals has exploded in the river! I remember the first time Isaw a seal in the middle river I thought I'd finally seen our Alaskan " Nessie"😳. Over the last several years we will now have dozens of seals that will live in the middle river all fall!! The percentage of fish we catch with seal bites can be close to 90 percent!! They are putting a real hurt on our spawning/staging silvers and have now started eating our resident rainbows! I know it's a " federal mammal " and the board doesn't have the authority/jurisdiction to address but it has become a real issue and just another reason we need to protect these middle river fish a bit more!

Another important area of concern is our obvious problems with our king returns. We can blame the set netters, us darn guides, the trawl fishery, drastic increases in PWS pink numbers, poor inriver mgt practices, or even old mother nature but the reality is they are all to blame and it's not an easy fix!😢. With that being said I think it would be incredibly " irresponsible " for the board to consider any proposals that ask for more commercial fishing time /area. These next several years we will be facing our lowest brood years on record and liberalizing any exploitation on a " stock of concern" would be incredibly irresponsible. I agree with Francis proposal 83 which will revise our inriver regulations to protect our female component of the run if/when we do have the opportunity to fish!

One more topic and I'll call her good!! I'm not sure if there was any actual proposal written up but I think it's time we consider expanding the dipnet fishing area! I had a conversation with someone in the dept about

moving the upper boundary to Cunningham park from the bridge! This would be about a mile increase, in good/navigatable waters. This fishery has also exploded in popularity and has become a real safety issue! If we moved the upper boundary it would spread out the effort, make it a better experience and most importantly much safer. These fish belong to the residents of Alaska and I think it's our responsibility to provide a safe area for this opportunity! A simple " fix" in my old brain!!😜.

Lots more to chat about but we can do that at the meeting! I will be popping in/out of meeting and would feel " honored" if you wanted to talk about anything. Feel free tha call anytime!

I " thank you" for your time and look forward to meeting you in person soon!

Mike Fenton/Fenton Bros Guided Sportsfishing

[redacted] 😎

PC83

Submitted by: Erick Fish
Community of Residence: Cooper Landing

Commenting on Proposals 179 and 180 in opposition to. These proposals are not rooted in any current scientific data. Examples of gross misuse of the resource are not available. Evidence of singular random acts should not be enough to close an entire portion of Upper Kenai River. As a full time year round resident and guide in CooperLanding I do not think its a good look for a board comprised mostly of guides to close a portion of the river only when it's convenient to them, after tourist season. Private property owners also do not get to decide the fate of the public in public waters with little to no scientific research performed or presented. Coho salmon studies are currently taking place along the entire Kenai River to get a better understanding of the species. Preempting their scientific studies that may indeed show a surplus of salmon would be a waste of state money and resources. Spawning and post spawn populations of salmon exist along the entire Upper Kenai River, closing one section would only increase the pressure in another section, potentially having more of an impact on the population than sporadic encounters amongst all the salmon. Again no real scientific data has been presented about the salmon and no estimates on numbers of anglers during that period exist. Closing the Upper Kenai River for six months is excessive to say the least and potentially damaging to local economies. I encourage the board to take no action on these proposals at this time.

Proposal 179: Oppose Proposal 180: Oppose

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman from Whittier, Alaska. This the most serious threat to salmon hatchery production in many years. The entire board of fish are new members with little or no understanding of hatchery benefits. They are being bombarded by anti-hatchery interests that are using a lot of lower 48 hatchery issues. The basic fact is salmon hatcheries in Alaska are not and have not been negatively affected natural stocks. The evidence is simply reviewing the wild salmon runs and the hatchery runs. Both are up from historic data.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries

and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Russell Fitzwater
[redacted]@[redacted]
Girdwood/Whittier, Alaska

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have been coming to Alaska fishing the Kenai and Cook Inlet for over 20 years. I am a big supporter of conservation. I have witnessed the "on and off" switch that the gill nets have caused with over-fishing and not allowing the native kings and sockeyes return to their natural habitats to spawn. The commercial fisherman have ruined the DNA of the largest species of salmon on the earth and to get back to the sizes and numbers once provided by nature may never happen again. They should be banned from this type of fishing as it is ruining the eco-system and future runs, if they aren't already harmed already. The sizes of fish are smaller, the amount in the runs less and the sports fisherman will stop flying to Alaska to fish if it continues. The commercial fisherman need to be restricted from their harmful actions, as they have destroyed the greatest fisheries in the world for greed. The unnecessary waste of kings at the expense of the sockeye catch is one of the greatest travesties this world has ever seen. Protect our fisheries and habitat before all is lost.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

RJ Forte
Draper, Utah, United States, UT

PC86

Submitted by: Collin Fountain
Community of Residence: Memphis, TN

LOWERING the current OEG for late-run king salmon in order to allow/justify commercial fishing and netting in the inlet is entirely unacceptable and should not be considered. Please consider proposal 83 that proposes a conservative start to the fisheries and then loosening restrictions when/if the kings show up in acceptable numbers.

Proposal 83: Support

PC87

Submitted by: Nigel Fox
Community of Residence: Sterling

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The angers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

Submitted by: Erik Frampton
Community of Residence: Anchorage, Alaska

In regards to Proposals 189-203 and the Upper Cook Inlet Personal Use fishery as a whole. I feel it would be beneficial to require users to apply for personal use permits in advance, similar to Tier 1/2 sustenance hunts in the State. This would require some foresight on the part of the users and potentially weed out some of the more irresponsible participants.

My comment pertains to Proposal 185 and specifically the steelhead fishery on the Kasilof river. Currently the Kasilof is the only stream on the Kenai Peninsula that does not allow for a periodic closure to protect overwintering/spawning fish. In fact, the regulation book explicitly states that the river is "open to fishing year-round" for steelhead. Spawning staging areas are easily accessible and regularly exploited at the mouth of Crooked Creek. As restrictions on other adjacent fisheries tighten, the Kasilof is experiencing an increase in pressure via the early season hatchery chinook and year round steelhead fishery. The Board should take measures to protect spawning steelhead via a closure similar to that on other Southern Kenai Peninsula streams. For more information please see the attached maps showing steelhead locations in April and May from the study "Gates, K. S., and Boersma, J. K., 2010, Spawning and Seasonal Distribution of Adult Steelhead in Southcentral Alaska’s Kasilof River Watershed from 2007 to 2009: US Fish and Wildlife Service: Soldotna, Alaska, v. Alaska Fisheries Data Series Report 2010-06"

Alaska Fisheries Data Series Number 2009-11, July 2009
U.S. Fish and Wildlife Service

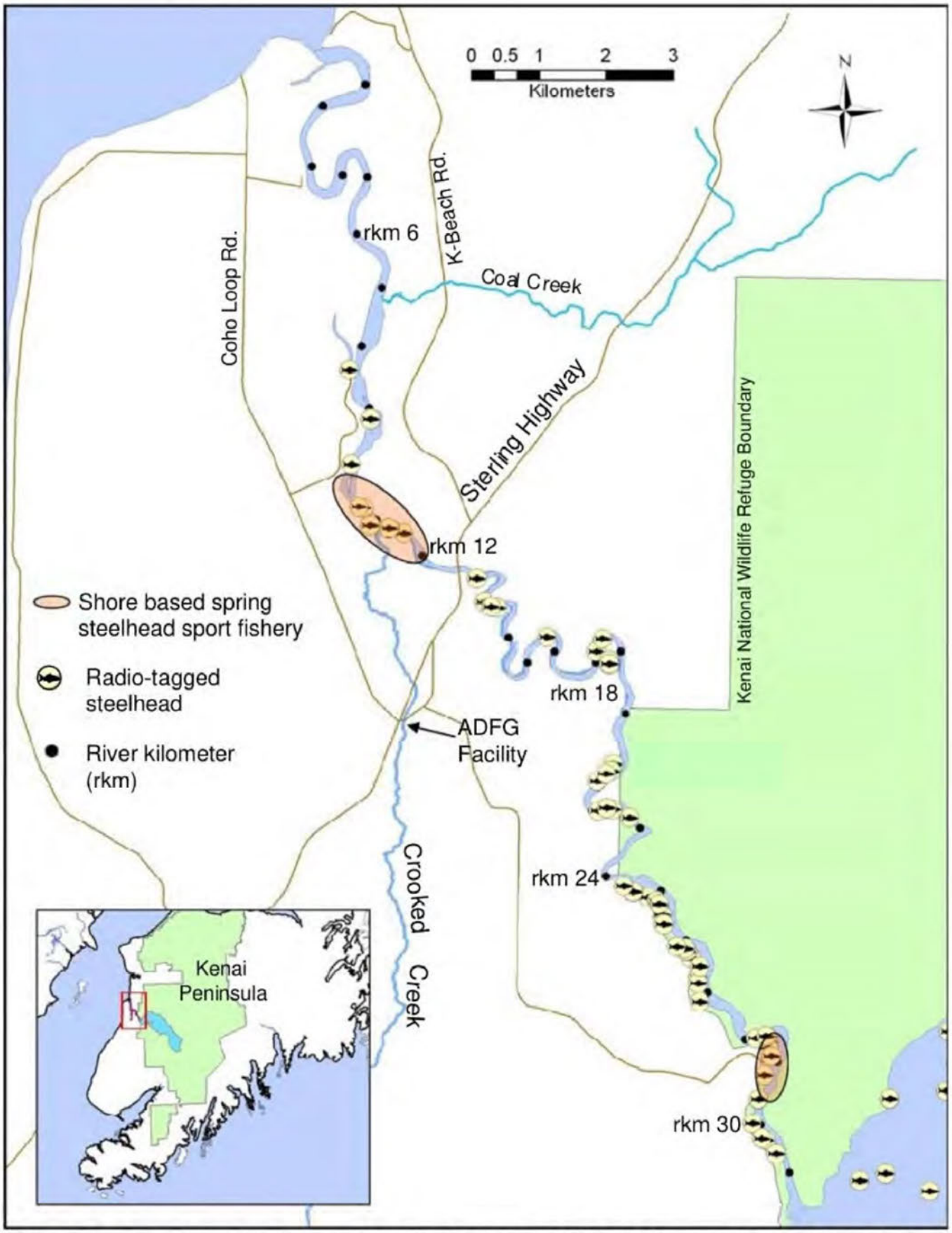

FIGURE 7.—Locations of radio-tagged steelhead during mobile tracking events conducted in the lower Kasilof River watershed during April, 2008. Shaded areas represent the general locations of fishing pressure from sport anglers in the Kasilof River during April.

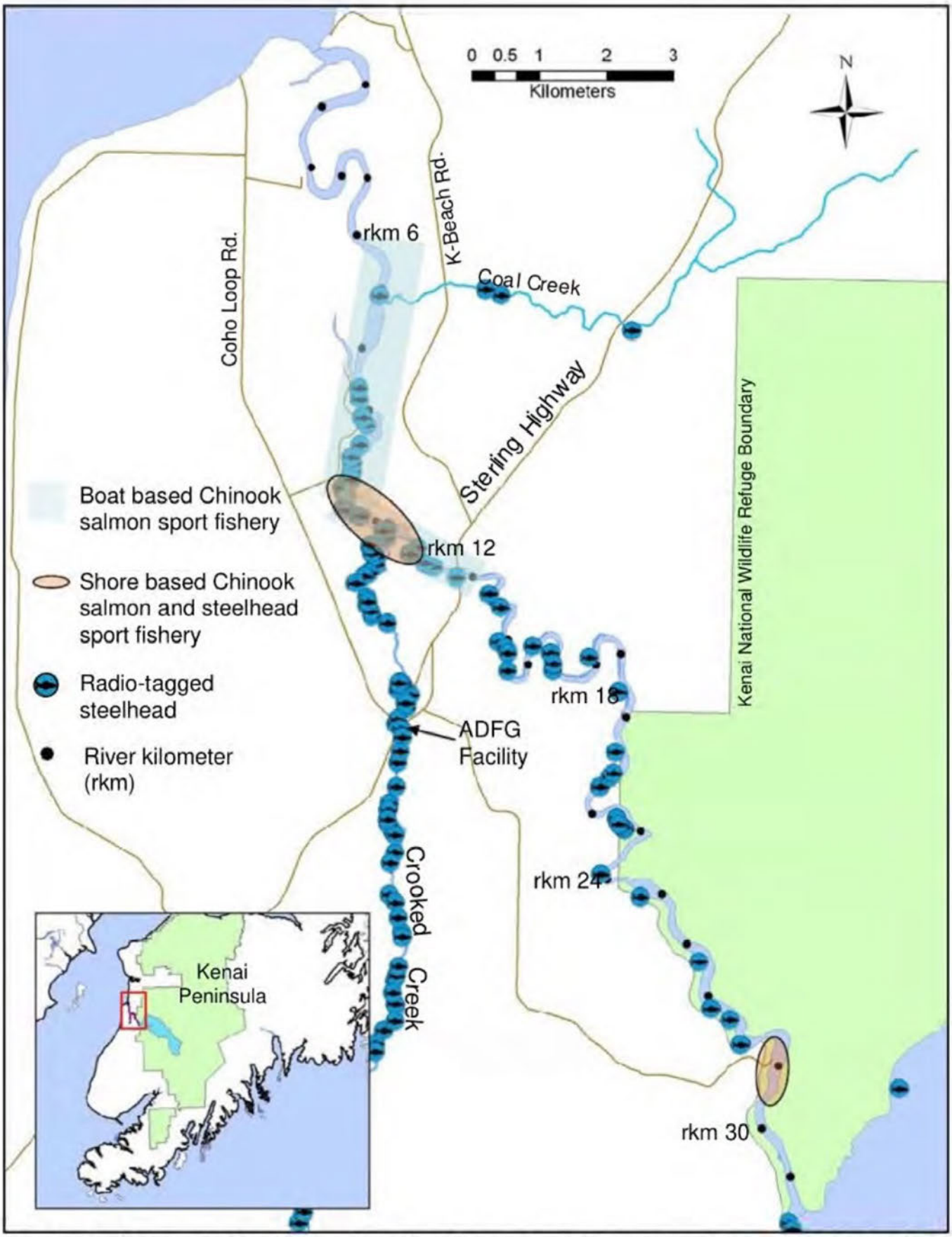

FIGURE 8.—Locations of radio-tagged steelhead during mobile tracking events conducted in the lower Kasilof River watershed during May, 2008. Shaded areas represent the general locations of fishing pressure from sport anglers in the Kasilof River during May.

PC89

Submitted by: Cooper Freeman
Community of Residence: Homer, AK

I am writing to offer my strong support for Proposal 216.

Proposal 216: Support

PC90

Submitted by: Sarah Frostad-Hudkins
Community of Residence: Chelan, WA

My name is Sarah Frostad-Hudkins. I am a third generation commercial fisherman on Salamatof Beach. I am a Kenaitze Tribal Member and a Board Member for Kenai Peninsula Fishermen's Association. My statement today represents myself, my family and our families 100 year old legacy. My Grandfather came to Alaska in the early 1920's and worked the fish traps for Libby, McNeil, and Libby. I currently fish on the same plot of land where he began, 100 years ago. The remnants of the olds traps can be seen at low tide which is a reminder of the deep history that surrounds our fishery.

The actions of the 2020 Board of Fisheries meeting has been detrimental to the Eastside Setnetters, leaving many unable to financially support themselves and a fear of what is happening to this generational fishery. We understand that changes have to be made to support the return of the large Kenai River King Salmon and we want those changes to be scientifically sound and allow our fishermen to have the opportunity to harvest sockeye salmon, when sockeye are abundant in the Inlet.

I support proposals 77, 78 and 80. I do ask that the Board to please reconsider the unattainable Optimal Escapement Goal of 15,000-30,000 large kings. I believe that the biological goal recommended by the Alaska Department of Fish & Game managing the Eastside Setnetters to the SEG of 13,500-27,000 large kings provides for future yields.

I strongly oppose proposal 90. This proposal is allocative. The current 36 hour window that is in regulation, is sufficient and the department should have the flexibility to open and close our fishery as needed to harvest the larger pulses of sockeye salmon entering the Kenai River. We do not want to have a forgone harvest and loss of future yield in the sockeye stocks due to continuous management objectives.

My long list of the proposals that I both support and oppose are listed below. I am attending the Board of Fisheries Meeting and would encourage the conversations to continue.

I strongly oppose proposals 90 and 106, in addition to proposals: 101, 112, 141, 150, 153, 154, 155, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232.

I support proposals: 75, 76, 77, 78, 80, 81, 82, 83, 85, 86, 87, 88, 91, 94, 97, 99, 100, 102, 103, 110, 114, 116, 117, 119, 120, 121, 122, 123, 124, 125, 128, 129, 130, 131, 133, 143, 144, 145, 146, 147, 148, 151, 152, 160, 161, 163, 164, 173, 176, 177, 178, 179, 180, 181, 185, 186, 187, 189, 190, 193, 195, 196, 197, 198, 199, 200, 211, 215.

Our fishery has been evolving and the list is long of changes that the Eastside Setnetters have made over the last 50 years, but I believe that there is a collaborative effort being made so that all user groups can conduct their businesses. Furthermore, my hope is that I can continue harvesting salmon on the same plot of land that my Father and Grandfather did, alongside my children and grandchildren. Our fishery is not only our livelihood, but our 100 year old family legacy. Please do not eliminate us.

Sincerely,

Sarah Frostad-Hudkins

frostadfisheries@gmail.com

Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose	Proposal 75: Support
Proposal 76: Support	Proposal 77: Support	Proposal 78: Support	Proposal 80: Support
Proposal 81: Support	Proposal 82: Support	Proposal 83: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 94: Support	Proposal 97: Support	Proposal 99: Support
Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support	Proposal 103: Support
Proposal 106: Oppose	Proposal 110: Support	Proposal 112: Oppose	Proposal 114: Support
Proposal 116: Support	Proposal 117: Support	Proposal 119: Support	Proposal 120: Support
Proposal 121: Support	Proposal 122: Support	Proposal 123: Support	Proposal 124: Support
Proposal 125: Support	Proposal 128: Support	Proposal 129: Support	Proposal 130: Support
Proposal 131: Support	Proposal 133: Support	Proposal 141: Oppose	Proposal 143: Support
Proposal 144: Support	Proposal 145: Support	Proposal 146: Support	Proposal 147: Support
Proposal 148: Support	Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support
Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose
Proposal 157: Oppose	Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose
Proposal 169: Oppose	Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose
Proposal 173: Support	Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support
Proposal 178: Support	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 183: Oppose	Proposal 185: Support	Proposal 186: Support	Proposal 187: Support
Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose	Proposal 192: Oppose
Proposal 193: Support	Proposal 194: Oppose	Proposal 195: Support	Proposal 196: Support
Proposal 197: Support	Proposal 198: Support	Proposal 199: Support	Proposal 200: Support
Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose	Proposal 208: Oppose
Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose
Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support	Proposal 217: Oppose
Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose	

2024 UCI Board of Fish Meeting

Written Public Comments

Brian and Lisa Gabriel

February 12, 2024

Mr. Chairman and Members of the Board of Fisheries,

We have lived on the central Kenai Peninsula for over 55 years and resided in the City of Kenai since 1987. We have also owned and operated a commercial setnet site on the Eastside of Cook Inlet continually since 1987. During this time, we have seen many changes to our fishery, many of these changes manifesting over the past ten years due to low Kenai River Chinook Salmon abundance.

As the Board of Fisheries (BOF) looks at options to allow for opportunity for harvest of Sockeye salmon, while minimizing Chinook salmon harvest within the Eastside Setnet (ESSN) Fishery, we have several thoughts and concerns we would like the Board to consider:

- In 2017, the BOF adopted the large Kenai River King escapement goal and revised the Sustainable Escapement Goal (SEG) to 13,500 to 27,000 for large Kings. At the same meeting the BOF moved the Kenai King Salmon counter from river mile 8 to river mile 14.
- At the 2020 Upper Cook Inlet BOF meeting, the Board adopted an Optimum Escapement Goal (OEG) of 15,000 to 30,000 large Kenai Large King Salmon, which coincidently, was the same range as the all Kenai Large King Salmon goal that was in place prior to 2017. This OEG was not a recommendation by the Department of Fish and Game, but rather a Board generated goal. The Department does not evaluate OEGs, as they are set by the Board and can incorporate non-biological factors.

What we are asking the Board to consider, is to allow for targeted harvest management strategies of Sockeye salmon within the ESSN fishery, while minimizing the harvest of Late Run Kenai River Chinook salmon when projecting escapement in the range of 13,500 (SEG) to 15,000 (OEG) Chinook salmon.

Every other non-target fishery for Kenai River Late Run Large King that is presumed to have a level of Kenai River Late Run King mortality associated with prosecution of that fishery, is allowed some level of opportunity. These fisheries include the Gulf of Alaska Trawl fisheries, Kodiak area setnet and seine fisheries, Lower Cook Inlet setnet and seine fisheries, Cook Inlet Drift fishery, Kenai and Kasilof River Personal Use Fisheries, and Kenai River sport fisheries. In the case of some of these fisheries, they are actually liberalized to harvest excess Sockeye salmon due to the ESSN fishery being severely restricted or shut down completely. The impacts of those fishery liberalizations are also unknown.

While the mortality of late run Kenai King salmon is likely low in these fisheries, there is a presumed accepted Kenai King mortality within these fisheries. (a request for this data was asked of the Department and to date we have not received a reply).

In other words, the ESSN fishery is the only non-target Kenai River Late Run Large King Salmon fishery that is not allowed harvest opportunity for targeted Sockeye Salmon when the Department is projecting to meet between 13,500 to 15,000 Kenai River Late Run Large Kings.

Historical average of ESSN exploitation of Kenai River late run Chinook salmon is around 13% in a fully prosecuted fishery using entirely 45 mesh deep nets. The Department has been given management tools since 2012 to reduce this exploitation rate through gear, area and time restrictions when prosecuting the harvest of Sockeye salmon. It is our hope that the BOF recognizes that the ESSN fishery is not a directed King fishery and should be treated the same as the other non-directed Kenai River Run King Fisheries. We believe that conserving Kenai River Late Run Large King salmon is important and at the same time recognize that there is Sockeye harvest opportunity for the ESSN fishery between the SEG and OEG.

While reading through the 2023/2024 UCI BOF proposal book and the newly released 2023 Kintama Report titled "Relative Fishing Depth and Harvest Rates of 15, 22, and 29 Mesh Setnets in the East-Side Fishing Area, Cook Inlet, Alaska, with an evaluation of the Potential Use of Acoustic Telemetry to Establish Migration Profiles of Returning Salmon", there appears to be a desire within the in-river sport fisheries and the folks at Kintama to create a narrative that closing down the Beach nets within the ESSN fishery (these are the nets closest to the shoreline and are generally fished using running lines instead of just anchoring each end) and focusing fishing efforts further offshore will result in less harvest of Kenai River Late Run Large Kings. Proposals 107 is one proposal that recommends these management actions in some form.

In addition, and more incredulous, is that a research firm that was engaged by the Department to study harvest rates of 15, 22, and 29 mesh deep nets in the ESSN fishery close to the mouth of the Kenai River in 2023, implies that closing down the Beach nets (the historical fish locations along the East side of Cook Inlet for over 146 years) and moving fishing offshore will potentially reduce Kenai River Late Run Large King harvest within the ESSN fishery.

What data and compelling evidence was cited by the Kintama group to assert this claim? On page 60 of the Kintama report under "Management Implications" it states "Our observation of the behavior of the Chinook charter boat sport fishing in 2013 was that they focused on fishing very shallow waters just off the beach at Anchor Point (2-3 m deep; 7-10'), so Chinook may be disproportionately abundant in very shallow waters near the beach. If so, then moving setnet fisheries farther away from the beach might reduce the interception rate of Large Chinook but because clearance under the nets will be greater and because Chinook may preferentially select very shallow waters. Resolving these uncertainties in future studies might identify further ways to reduce the harvest of large Chinook." That's a lot of assumptions.

Additionally, on page 61 item (7) under 'Recommendations for Further Study" the authors seem to contradict their thesis regarding behavior of Kenai River Late Run Large King salmon along the shoreline based on the marine charter fleet by stating that "Our 2013 study found that

acoustically-tagged Chinook appeared to preferentially "patrol" the offshore edge of the ESSN zone relative to areas even farther offshore, a behavior different to sockeye", before referencing the Anchor Point charter fleet once again.

Below are a couple of things to consider with these statements:

a) A quick check of the available genetic testing data for this marine sport fishery which spans from 2014 to 2018, shows that 7.8% of the King salmon (all sizes) harvested in this fishery are of Kenai River origin. The data shows that during this period, an average of 92 Kenai Kings (all sizes) were harvested annually, and the average annual Kenai River Late Run Large King total return was 22,220.

b) In August of 1998, a report was published by the Department titled "Investigation of Methods and Means to Minimize Chinook Salmon Harvest in the East Side Set Net Fishery of Upper Cook Inlet, 1996" (Special Publication No. 98-3). The primary purpose of this study was to determine if there could be a "Conservation Corridor" established within the ESSN fishery to pass Kings to the Kenai River. The observation areas were set up in three zones both North and South of the Kenai River. Within the zones were areas designated as Near, Mid and Offshore sections for observation of Chinook harvest and in what depth of the net the fish were caught. Essentially, what this study found was that the harvest of Chinook Salmon within the ESSN fishery North of the Blanchard Line (North K-Beach and Salamatof beach) was more prevalent in the nets either in the Mid and Offshore sectors. In addition, the study found that without exception, that the harvest rate of Sockeye salmon was highest in the near shore nets. Please read this report.

c) Harvest data of the ESSN fishery when comparing King harvests at times when different harvest areas were open within the ESSN fishery (all ESSN, Kasilof out to 1.5 miles, Kasilof out to .5 miles, Kasilof 600', North K-Beach to 600' and total ESSN fishery to 600') clearly shows higher Sockeye harvest rates with less impact to Kings.
This data makes sense because there is less gear in the water but also shows that Kings are not harvested at a higher rate along the beach if the outer areas are closed. Ideally, we would like to see opportunity throughout all areas of the ESSN. The purpose of pointing this out is to dispel the notion that the Beach nets are primarily responsible for most of the King harvest within the ESSN fishery. Looking at the data, it would appear that there may be a higher likelihood of increased King harvest and less Sockeye harvest if the fishing effort is moved farther away from the beach. Considering the available data, and the scope of the study, we feel that it is extremely irresponsible for Kintama to insert this theory into their report and wrap it into Management Implications.

We support testing new gear types in the Eastside Setnet Fishery that could provide reasonable harvest of targeted sockeye while minimizing King mortality.

Thank you for your time and consideration.

Brian and Lisa Gabriel

Lisa Gabriel

Kenai, Alaska

Support Proposal 77:

This proposal will allocate some sockeye back to the Eastside Setnet Fishery, a 145-year historic harvester of sockeye salmon in Upper Cook Inlet and manage the Eastside Setnet Fishery to offer some harvest opportunity on plentiful targeted sockeye salmon. I favor the Eastside Setnet fishery being managed to the sustainable escapement goal (SEG) to harvest targeted sockeye salmon. The current OEG of 15,000 to 30,000 large Kenai River Late Run King Salmon goal closes fisheries and does not provide the protection of Late Run Kenai River King Salmon as intended by the Board of Fisheries in 2020. The prescriptive and surgical management of hitting the lower end of the OEG at 15,000, which is in the mid-range of the SEG of 13,500-27,000, has prevented harvest opportunity of sockeye only in the Eastside setnet fishery even when the lower end of the Late Run Kenai River King Salmon SEG is projected, while all other fisheries are liberated for the harvest of sockeye. The board allows harvest and interaction with Chinook Salmon in EVERY other fishery in their pursuit of Sockeye in Upper Cook Inlet and other migratory areas of the State. It is not fair or equitable. The restrictions on our historic fishery in 2023 should never be repeated.

Support Proposal 78:

This proposal will allocate some sockeye back to the Eastside Setnet Fishery, a 145-year historic harvester of sockeye salmon in Upper Cook Inlet and manage the Eastside Setnet Fishery to offer some harvest opportunity on plentiful targeted sockeye salmon. I favor the Eastside Setnet fishery being managed to the sustainable escapement goal (SEG) to harvest targeted sockeye salmon. The current OEG of 15,000 to 30,000 large Kenai River Late Run King Salmon goal closes fisheries and does not provide the protection of Late Run Kenai River King Salmon as intended by the Board of Fisheries in 2020. The prescriptive and surgical management of hitting the lower end of the OEG at 15,000, which is in the mid-range of the SEG of 13,500-27,000, has prevented harvest opportunity of sockeye only in the Eastside setnet fishery even when the lower end of the Late Run Kenai River King Salmon SEG is projected, while all other fisheries are liberated for the harvest of sockeye. The board allows harvest and interaction with Chinook Salmon in EVERY other fishery in their pursuit of Sockeye in Upper Cook Inlet and other migratory areas of the State. It is not fair or equitable. The restrictions on our historic fishery in 2023 should never be repeated.

Support Proposal 81:

Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in a foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon, and have inflicted severe economic impacts to the fishers, as well as the Central Peninsula borough and all of the local communities. This proposal would provide the Alaska Department of Fish and Game an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar projects 13,500 fish, which is the sustainable escapement goal for Kenai River large late-run king salmon established by the department, thereby assuring that a sustainable level of king salmon escapement is achieved while

providing additional sockeye salmon harvest opportunity beyond what is currently allowed. The current plan closes the sockeye-targeted set gillnet fishery and immediately liberalizes the commercial drift fishery, the personal use fisheries, and commercial guided in-river sport sockeye fisheries to target sockeye salmon.

Oppose Proposal 90:

I oppose windows in the Eastside Setnet fishery. Windows tie managers' hands when/if fish are abundant in the fishing district during the window closure. They do not support fishing on abundance in the Eastside Setnet fishery.

Support Proposal 91:

Restrictions placed on the Kenai River king salmon sport fishery for the conservation of the targeted stock, large late run Kenai River Kings, should not in turn have restrictions placed on the set gillnet fishery, that is a sockeye targeted fishery, if the department of fish and game is projecting to achieve the management objective for Kenai River Late run kings. The regulation of having to achieve the OEG instead of projecting the OEG is purely punitive to unnecessarily restrict the ESSN from the fishery.

Oppose Proposal 95:

The data does not support the narrative that shorter nets catch less king salmon.

Support Proposal 100:

This proposal provides ADFG an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar goal exceeds 13,500 fish, which is the sustainable escapement goal (SEG) for Kenai Rive late-run large king salmon established by ADFG, thereby assuring that a sustainable level of escapement is

achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. In considering these emergency order openings the department will evaluate the number and size of king salmon harvested in the set gillnet fishery and manage conservatively to minimize king salmon harvest as well as the need to ensure provisions of other related management plans are met.

Oppose Proposal 101:

Currently under the Kenai River Late-Run King Salmon Management Plan and the Kasilof River Salmon Management Plan the commissioner has the authority via Emergency Order to open and restrict fishing to within six hundred feet of the mean high tide mark, in the ESSN fishery which is exempt from hours. The hourly exemption is so ADFG managers have the full hours available to them if the sockeyes are abundant on the beaches during the week so the entire setnet fishery could be fished to harvest their targeted sockeye. This will help managers manage to their sockeye management objectives. The commissioner does have the option to reduce gear in the 600ft fishery. The 600ft fishery can be a very helpful tool in harvesting targeted sockeye in the ESSN fishery and restricting the hours when sockeyes are plentiful on the beach is contrary to those objectives.

Support Proposal 102:

Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in a foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon, and have inflicted severe economic impacts to the fishers, as well as the Kenai Peninsula Borough and all of the local communities. This proposal would provide the Alaska Department of Fish and Game an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late- run large king salmon sonar projects 13,500 fish, which is the sustainable escapement goal for Kenai River large late-run king salmon established by the department, thereby assuring that a sustainable level of king salmon escapement is achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. The current plan closes the sockeye-targeted set gillnet fishery and immediately liberalizes the commercial drift fishery, the personal use fisheries, and commercial guided in-river sport sockeye fisheries to target sockeye salmon. All because we are attempting to achieve a politically driven OEG not the biologically backed SEG.

Oppose Proposal 106:

The current regulation regarding gear in the 600ft fishery is fair. Setnetters should be allowed to make that decision based on the current regulation and their ability to maximize their targeted sockeye harvest. Gear is indeed reduced under (e)(3)(G)(i) and (ii). Nets can by regulation be reduced. The author of the proposal is incorrect.

Oppose Proposal 107:

The statement by the author that "The creation of the 600 ft. fishery in theory was to reduce Chinook Salmon catches in the east side set gillnet fisheries" is incorrect. It was to allow limited harvest opportunity in the ESSN fishery to harvest plentiful targeted sockeye salmon while reducing the harvest of chinook salmon that could possibly happen with a fully prosecuted fishery. Data does not support that there is an increased chance in Chinook Salmon harvest in most areas of the ESSN fishery that the 600 ft fishery occupies. Moving nets off the beach does not make sense if you want to harvest sockeye. Data does support that all nets are off the bottom during most of the stages of the tide while fishing on the beach and offshore nets.

Oppose Proposal 112:

The sockeyes that are already allocated to the in-river users are not currently being harvested by in-river users resulting in foregone harvest. Why would you want to allocate more and increase the pressure of boats, boots on the banks and in the river? Changing the numbers in the regulation doesn't correct the over escapement of sockeye which threatens future sockeye yields.

Support Proposal 128:

At the March 2019 BOF Statewide meeting, "clear intent" was given by a BOF Member as to when the NKB 600 ft fishery should be used. In passing a portion of 5 AAC 21.310. (C) (ii), on the record, he stated his position was when "any portion of the Kasilof Section is fishing to help control escapement into the Kasilof, the Northern K Beach setters within 600 ft WOULD be fishing". There was no opposing discussion to his statement. This proposal passed the BOF 6-1. The proposal, in 2019, as written was a," may be allowed", even thou INTENT was given by the BOF to ADF&G to fish NKB 600 ft fishery, when any portion of the Kasilof Section was fishing. The proposal would change the (may) be allowed to a WILL be

allowed. This would give ADF&G guidance, but more importantly help stop exceeding BOF mandated sockeye goals to the Kasilof River.

Oppose Proposal 141:

This proposal seeks to alter the gear in a 145 year old fishery AFTER the management objectives are being met and the ESSN fishery is being managed under the Kenai River Late Run Sockeye Management Plan. This proposal is punitive and ridiculous.

Submitted by: Coley Gentzel
Community of Residence: Anchorage, AK

Hello and thank you for considering my comments regarding a number of issues and proposals currently in front of the Board.

I would first like to comment on the early and late runs of king salmon on the Kenai River. It is now well understood by anyone paying attention that king salmon runs on the Kenai are headed for extinction. Kings on the Kenai have now failed to replace themselves for the last 4 years. The kings are coming back in fewer numbers, smaller sizes, and in age distributions (smaller and younger) than has been documented in the past. All of these things are bad news, and it is unlikely, if not impossible, that the factors affecting this lack of productivity and increased mortality will change anytime soon. The blames and causes are many but the takeaway and needed action is the same regardless of the causes. If we are to save the Kenai kings from seemingly guaranteed functional extinction, we need to take drastic and immediate action to make sure as many kings make it to the spawning gravel as possible for the foreseeable future.

Seeing as how complete and ongoing closures of the in-river fishery and set/drift net fishers for sockeye are a non-starter for many reasons, I would like to voice my strong support for Proposal 83. This proposal advocates for a conservative approach to the in-season management of the king and sockeye fisheries to make better use of in-season run performance before easing restrictions and increasing fishing opportunities. Again, as we are all aware, the model of "start liberal and move to more conservative management if the run doesn't materialize approach" is not working. Under this model, by the time we realize the run is underperforming, we've already killed a meaningful number of king salmon. In the current situation, every large female king salmon plays a hugely important role in the survival of the species. Based on research from last years run, approximately 600 4+ year-old female king salmon returned in the late run. That should shock and horrify anyone who care about saving this run.

The only responsible way to manage the fishery under current conditions is to start closed and allow opportunities to fish both in the river and with nets if the in-season run performance dictates that can be done without unacceptable impact, that is failing to meet the minimum optimum escapement goal. The Board and Department will never be able to make all stakeholders happy, but proposal 83 is about as close as we can come to allowing some opportunity for everyone to fish while giving the kings a decent chance of starting to recover.

Some additional thoughts related to the Kenai. It seems the Board and Department have essentially written off the early run. This genetically special strain of fish is as worthy, if not more so, of protection as the late run. Please consider listing is at a stock of management concern or stock of conservation concern and consider implementing measures to help save this run as well.

Any proposals suggesting that the OEG be lowered (or some other lower metric like SEG be used) for either run of kings on the Kenai should be discarded with haste. The lower end of OEG for the late run, 15,000 fish, in the opinion of many is already irresponsibly low. Our target, at a minimum, should be closer to the higher end of 30,000 fish which is still well below the historic average when the late run was managing to sustain itself with around 50,000 fish coming back each year.

With regard to the impact that set nets have on Kenai kings, one setnet site, the Salamatof site, is responsible for something like 70% of the dead kings in setnets. I understand the State is working on a buy back/buy out system for existing set net permit holders. Please prioritize the Salamatof site as part of this program and in doing so, a huge step towards conserving Kenai kings will have been taken.

One final comment regarding the Kenai king salmon management on the Kenai river, because so many management decisions have traditional been made based on the pre-season forecast, the Board and/or Department needs to review and revise the formula that they use to determine the PSF to line it up with current size/age makeups in the runs from the last handful of years. This is unfortunately the new normal and using

formulas that include unrealistic numbers of 4+ year old fish aren't going to line up with reality in the foreseeable future.

Regarding Proposal 161, setting aside some time for non-guided anglers to fish for sockeye without competition from the guides would be greatly appreciated. As the proposal notes, it has become hard, if not impossible to find a bank fishing spot to fish from due to the high volume of guides fishing sockeye around the clock even for anglers willing and able to fish from very difficult and dangerous spots. Finding a spot suitable for young anglers and anglers with reduced mobility and physical limitations. In many of the spots I have tried to fish with my young children on the Kenai from the bank, I have been harassed by private property owners (while legally fishing) and guides trying to push out of "their" spots. In addition to limiting guides to operating hours of 6am to 6pm, closing the river to guide fishing one day a week would also help provide additional opportunity to anglers who are less willing and able to "compete" with the guide fleet. I support proposal 161.

Thank you.

C. Gentzel

Anchorage, AK

[redacted]

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 83: Support	Proposal 84: Oppose	Proposal 90: Oppose	Proposal 91: Oppose
Proposal 92: Oppose	Proposal 93: Oppose	Proposal 95: Oppose	Proposal 96: Support
Proposal 97: Oppose	Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Oppose
Proposal 101: Oppose	Proposal 102: Oppose	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 108: Oppose	Proposal 109: Oppose	Proposal 110: Oppose	Proposal 161: Support

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PC93

Submitted by: Coley Gentzel
Community of Residence: Anchorage, AK

Proposal 238, motor size restriction on the Little Susitna River.

I opposed proposal 238 for the following reasons.

1. In the context of juvenile salmon survival and habitat, bank erosion is not an issue of concern on the Little Susitna River. The Little Susitna is not the Kenai river. Suitable riparian habitat for juvenile fish to rear in can be found along almost every inch of the river from salt water to the headwaters. The Little Susitna is a very dynamic volatile system and the condition of the banks changes significantly after every high water event. These changes, though, largely mean more woody debris and organic matter entering the river and adhering to the banks, creating new and different habitat no less suitable than the old habitat. I believe this proposal was submitted from a general understanding or knowledge that on certain rivers, bank erosion is a significant issue, like on the Kenai for example, where riparian habitat is often few and far between and suitable rearing habitat for juvenile fish is easily destroyed and very infrequently created. One cannot simply take this concept from one river to another without looking at the conditions and issues that exist in the new system. If there is an argument to be made for motor and/or boat size restrictions, I think one being based on boater safety might have merit, but the minimal amount of bank erosion happening from boats as a whole on the Little Su, not just boats with larger motors, is not of concern with regard to habitat and salmon spawning productivity.

2. Motor size is only one component of what affects the size and velocity of a boats wake. Restricting only the size of a motor without other total overall weight limits or hull and displacement designs would be relatively meaningless regarding the effect of boats wakes on the bank. High displacement hulls with large V bows and boats that "plow" and "dredge" often throw a much bigger wake than a shall displacement hull with a flat bottom and light V with larger motors. If the Board considers this an issue of concern with regard to bank erosion, which again I don't think that it is, they would be better served to look at things like overall vessel weight restrictions, inboard vs. outboard restrictions, or hull design restrictions, all of which seem like they would be very difficult to both regulate and enforce. My 16' drift boat with a 2.5hp outboard throws a much larger wake at 5mph than my 20' flat bottomed jet boat with a 140hp outboard does at 35mph. That is a simple, easily observed fact.

The operator of a boat also plays a large part in wake formation based on speed and maneuvering. Other than speed limit, those behaviors are functionally impossible to regulate and enforce. In my opinion, if there are problems with boats on the Little Su, they could be summed up as "big boats going too fast," and again this is a boating safety issue rather than a habitat issue and motor size would do little to change that situation.

Thank you for the consideration.

C. Gentzel

Anchorage, AK

[redacted]

Proposal 238: Oppose

Hello and thank you for considering my comments regarding a number of issues and proposals currently in front of the Board.

I would first like to comment on the early and late runs of king salmon on the Kenai River. It is now well understood by anyone paying attention that king salmon runs on the Kenai are headed for extinction. Kings on the Kenai have now failed to replace themselves for the last 4 years. The kings are coming back in fewer numbers, smaller sizes, and in age distributions (smaller and younger) than has been documented in the past. All of these things are bad news, and it is unlikely, if not impossible, that the factors affecting this lack of productivity and increased mortality will change anytime soon. The blames and causes are many but the takeaway and needed action is the same regardless of the causes. If we are to save the Kenai kings from seemingly guaranteed functional extinction, we need to take drastic and immediate action to make sure as many kings make it to the spawning gravel as possible for the foreseeable future.

Seeing as how complete and ongoing closures of the in-river fishery and set/drift net fishers for sockeye are a non-starter for many reasons, I would like to voice my strong support for Proposal 83. This proposal advocates for a conservative approach to the in-season management of the king and sockeye fisheries to make better use of in-season run performance before easing restrictions and increasing fishing opportunities. Again, as we are all aware, the model of "start liberal and move to more conservative management if the run doesn't materialize approach" is not working. Under this model, by the time we realize the run is underperforming, we've already killed a meaningful number of king salmon. In the current situation, every large female king salmon plays a hugely important role in the survival of the species. Based on research from last years run, approximately 600 4+ year-old female king salmon returned in the late run. That should shock and horrify anyone who care about saving this run.

The only responsible way to manage the fishery under current conditions is to start closed and allow opportunities to fish both in the river and with nets if the in-season run performance dictates that can be done without unacceptable impact, that is failing to meet the minimum optimum escapement goal. The Board and Department will never be able to make all stakeholders happy, but proposal 83 is about as close as we can come to allowing some opportunity for everyone to fish while giving the kings a decent chance of starting to recover.

Some additional thoughts related to the Kenai. It seems the Board and Department have essentially written off the early run. This genetically special strain of fish is as worthy, if not more so, of protection as the late run. Please consider listing is at a stock of management concern or stock of conservation concern and consider implementing measures to help save this run as well.

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One final comment regarding the Kenai king salmon management on the Kenai river, because so many management decisions have traditional been made based on the pre-season forecast, the Board and/or Department needs to review and revise the formula that they use to determine the PSF to line it up with current size/age makeups in the runs from the last handful of years. This is unfortunately the new normal and using formulas that include unrealistic numbers of 4+ year old fish aren't going to line up with reality in the foreseeable future.

Regarding Proposal 161, setting aside some time for non-guided anglers to fish for sockeye without competition from the guides would be greatly appreciated. As the proposal notes, it has become hard, if not impossible to find a bank fishing spot to fish from due to the high volume of guides fishing sockeye around the clock even for anglers willing and able to fish from very difficult and dangerous spots. Finding a spot suitable for young anglers and anglers with reduced mobility and physical limitations. In many of the spots I have tried to fish with my young children on the Kenai from the bank, I have been harassed by private property owners (while legally fishing) and guides trying to push out of "their" spots. In addition to limiting guides to operating hours of 6am to 6pm, closing the river to guide fishing one day a week would also help provide additional opportunity to anglers who are less willing and able to "compete" with the guide fleet.

Thank you.

C. Gentzel
Anchorage, AK
[redacted]@[redacted]

Proposal 238, motor size restriction on the Little Susitna River.

I opposed proposal 238 for the following reasons.

1. In the context of juvenile salmon survival and habitat, bank erosion is not an issue of concern on the Little Susitna River. The Little Susitna is not the Kenai river. Suitable riparian habitat for juvenile fish to rear in can be found along almost every inch of the river from salt water to the headwaters. The Little Susitna is a very dynamic volatile system and the condition of the banks changes significantly after every high water event. These changes, though, largely mean more woody debris and organic matter entering the river and adhering to the banks, creating new and different habitat no less suitable than the old habitat. I believe this proposal was submitted from a general understanding or knowledge that on certain rivers, bank erosion is a significant issue, like on the Kenai for example, where riparian habitat is often few and far between and suitable rearing habitat for juvenile fish is easily destroyed and very infrequently created. One cannot simply take this concept from one river to another without looking at the conditions and issues that exist in the new system. If there is an argument to be made for motor and/or boat size restrictions, I think one being based on boater safety might have merit, but the minimal amount of bank erosion happening from boats as a whole on the Little Su, not just boats with larger motors, is not of concern with regard to habitat and salmon spawning productivity.

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   Thank you for the consideration.

C. Gentzel
Anchorage, AK
[redacted]@[redacted]

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I participate in subsistence, commercial, and sport fisheries in Cordova, Alaska. I support the removal of Proposal 59, and I oppose Proposal 43.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Darin Gilman
[redacted]
Cordova, AK

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman in Cordova, Alaska. The hatchery system has kept my business viable through 40 years of ups and downs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization..

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
John Grocott
[redacted]
Cordova, Alaska

Submitted by: Grant Gullicks
Community of Residence: Chugiak, AK

All effort must be taken to help King salmon populations rebound. Management should be for the betterment of the resource, NOT the user groups. King salmon have been on the decline for over a decade and nothing has been done. Management efforts up to this point have not been adequate. A dead King salmon is a dead King salmon, all bycatch from commercial trawlers and other fishing must be counted towards any intended harvest quotas for all users, especially the commercial fleet. We must all do our part, but regulations on the smallest users groups accomplish nothing. The largest user group has the largest impact. We must act before it is too late. Over harvest and missing minimum escapement goals is not acceptable. We must start out conservative and only once escapement goals have been met should any harvest be considered. I have voted with this in mind.

Proposal 1: Support Proposal 2: Oppose Proposal 3: Support Proposal 43: Support
Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Oppose
Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Oppose
Proposal 83: Support Proposal 84: Support Proposal 85: Oppose Proposal 86: Oppose
Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Support
Proposal 91: Oppose Proposal 92: Oppose Proposal 94: Support Proposal 95: Support
Proposal 96: Support Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose
Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose
Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Support Proposal 107: Support
Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose
Proposal 112: Support Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose
Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose Proposal 119: Oppose
Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose
Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose
Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose
Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Oppose Proposal 135: Support
Proposal 136: Support Proposal 137: Support Proposal 138: Oppose Proposal 139: Oppose
Proposal 140: Oppose Proposal 141: Support Proposal 142: Support Proposal 143: Oppose
Proposal 144: Oppose Proposal 145: Oppose Proposal 146: Support Proposal 147: Support
Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Support Proposal 151: Oppose
Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose
Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Oppose
Proposal 160: Support Proposal 161: Support Proposal 162: Oppose Proposal 163: Support
Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support
Proposal 168: Oppose Proposal 169: Support Proposal 170: Oppose Proposal 171: Support
Proposal 172: Support Proposal 175: Support Proposal 182: Oppose Proposal 185: Support
Proposal 189: Support Proposal 190: Support Proposal 191: Support Proposal 192: Oppose
Proposal 193: Support Proposal 194: Oppose Proposal 197: Support Proposal 200: Support
Proposal 201: Oppose Proposal 202: Support Proposal 204: Oppose Proposal 205: Support
Proposal 206: Support Proposal 207: Support Proposal 208: Support Proposal 209: Support
Proposal 210: Support Proposal 211: Oppose Proposal 212: Support Proposal 214: Oppose
Proposal 215: Oppose Proposal 218: Oppose Proposal 219: Support Proposal 221: Support
Proposal 224: Support Proposal 229: Oppose Proposal 239: Oppose Proposal 240: Oppose
Proposal 241: Oppose Proposal 242: Oppose Proposal 243: Support Proposal 251: Oppose
Proposal 252: Support Proposal 255: Oppose

PC97

Submitted by: Brian Harrison
Community of Residence: Homer, AK

I strongly oppose any further manipulation of the Kenai river escapement goals as proposed by KRSA in proposal #112. The only acceptable change would be to adopt one goal of 700,000-1,000,000 no matter the run size.

I strongly support proposal #122 that would repeal the 1% rule for the drift fishery. With the Kenai river repeatedly having strong escapement in August, it makes no sense to prevent the harvest of these surplus stocks in August. Allowing the drift fishery to continue through August 15th would provide an opportunity to harvest these surplus stocks that have continually led to over escapement of their Kenai river.

Tidal fluctuations often leads to several days of little fish movement into the river, followed by large numbers a short time later. Openings that happen on those slow days may trigger the 1% rule only to have a large harvestable surplus move into the river after the closure. Allow F&G to manage by abundance and remove the obstacles that keep them and the fleet on the sideline.

Proposal 112: Oppose Proposal 113: Support With Amendments Proposal 114: Support With Amendments Proposal 115: Support With Amendments Proposal 118: Support With Amendments Proposal 120: Support With Amendments Proposal 121: Support With Amendments Proposal 122: Support With Amendments Proposal 123: Support With Amendments Proposal 124: Support With Amendments Proposal 125: Support With Amendments Proposal 127: Support With Amendments Proposal 144: Support With Amendments Proposal 145: Support With Amendments Proposal 149: Support With Amendments Proposal 150: Oppose Proposal 152: Support With Amendments Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Oppose Proposal 160: Oppose Proposal 161: Support Proposal 162: Oppose Proposal 164: Support Proposal 165: Support Proposal 169: Oppose Proposal 171: Oppose Proposal 175: Support Proposal 177: Support Proposal 189: Support Proposal 190: Support Proposal 191: Support Proposal 192: Support Proposal 194: Oppose Proposal 196: Support Proposal 197: Support Proposal 198: Support Proposal 199: Support Proposal 200: Support Proposal 201: Support Proposal 203: Oppose

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PC98

Submitted by: Ryan Hatt
Commercial fishermen

Community of Residence: Soldotna

I would like to talk about substance fishing at mouth of kasilof river with nets. [redacted] adfg official will talk about historical avg because that fits his narrative ask for the 5 year avg the last time it was open 2years ago 20 sumthing kings caught with an unknown amount of kenai kings salmon even less large ones possibly one to 3. He also can close it when he wonts he just wonts to hide behind board of fish. If this is closed there has to be serious talk about closing dippnetting in the mouth of kenai which are for sure catching kenai kings. Take that avg then double it cause there now open 24 when the historical avg was only 12 hrs a day. Those hatchery kings are for everyone not just the guides.

Proposal 200: Oppose

Submitted by: Richard Hoffman
Community of Residence: Minnesota

I'm supporting Proposal 83….thank you

Proposal 83: Support

ALASKA BOARD OF FISHERIES 2023-2024

PROPOSAL 203

KASILOF RIVER DIP NET FISHERY MARINE BOUNDARY

Davin Holen
[redacted]
Anchorage, AK [redacted]
[redacted]

On July 27, 2022, around 2:00 PM in the afternoon, 3 hours from high tide, Alaska State Trooper Wildlife Enforcement cited a number of us on the beach fishing the south shore of the Kasilof River in the personal use dip net fishery. According to regulation, the Wildlife Troopers were correct in their citation. However, the map provided with the personal use permit shows a different area (Figure 1). We were fishing according to the map provided with the permit. At low tide, we were fishing well east of the south shore regulatory marker. However, if you drew a straight line between the two orange markers, we were just over the line at a moderate low tide. I would say around 20 people were cited. Most were a few yards over the boundary.

Figure 1. Map on permit

This short summary describes my confusion and the fact that members of the public would be confused as well, not only by the map provided but by the location of the regulatory markers that create a diagonal line across the mouth of the Kasilof River. On the permit, the area shown to be open to fishing extends past the regulatory marker on the south shore. I assume this is to account for low tide if I remember correctly from past Board of Fisheries meetings. It's difficult to fish too close to the south shore marker

as there is silt and high wave action as the tide comes in. In the 15 consecutive years I've fished this location, I've rarely seen anyone fish close to the south shore marker except at low tide.

The Wildlife Troopers I spoke with mentioned that it is difficult to see who is over the line. The only time it's an issue is at low tide. Once the tide is coming in, no one fishes that far west towards the south shore marker; everyone on the south shore is well east of the boundary formed by the markers at the mouth of the Kasilof River. The Troopers noted that to identify who was out of bounds, they walked over to the south shore marker and put their thumb up, making a straight line, and picked out everyone on the west side of the imaginary line between markers. The problem lies in that the regulatory line is not a straight line extending from the mouth of the river on the south shore to the mouth of the river on the north shore as it appears on a map, but a diagonal line that is difficult to track both in the water as well as from the shore. After taking their thumbs eye view of the line, once the troopers got down to the water, everyone had moved, including the person they were using as a reference, so it was difficult to identify who was actually on the wrong side. They just called everyone remotely near the line out of the water and gave us all citations. I want to note that I appreciate the professionalism of the Wildlife Trooper whom I spoke with, and we had a good conversation about the regulations for this fishery. The trooper informed me that they were also frustrated and it would help to have more clear guidance for fishers. However, they were directed to issue citations.

Figure 2 shows the map on the permit, and I drew a line that reflects the actual line in regulation. Figure 3 shows the approximate location I was fishing using a GPS marker, and Figure 4 shows an image from the area of how far inside the boundary from the south shore marker I was.

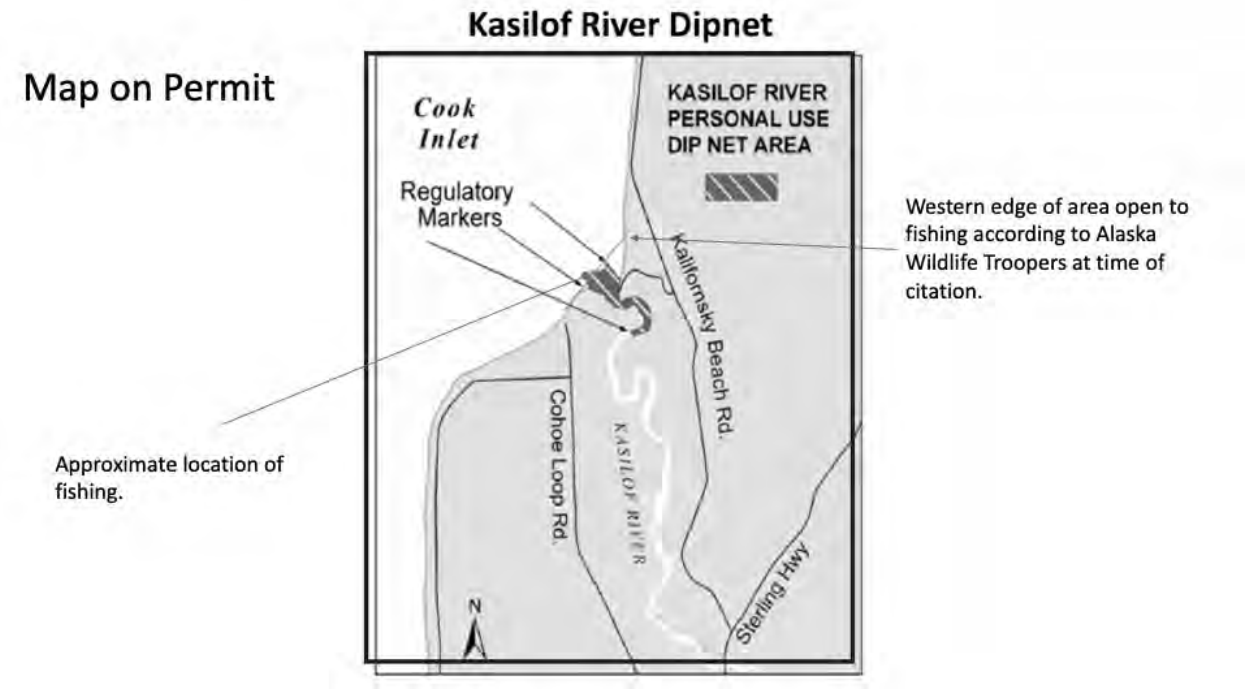

Figure 2. Map on permit with regulatory line, 2022

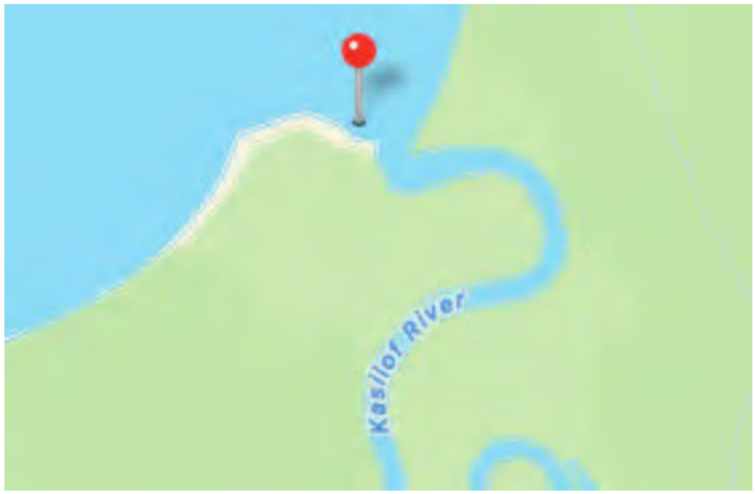

Figure 3. GPS Location Taken at Time of Citation

Figure 4. Approximate Location at Time of Incident: South Shore Marker in the Distance to the West, Marker outlined.

I'm an anthropologist and faculty member in the University of Alaska Sea Grant Marine Advisory Program. Prior to this, I spent 15 years working for the Alaska Department of Fish and Game (ADF&G), Division of Subsistence. From 2010 – 2015, I was the regional program manager for southern Alaska. I attended 5-7 Board of Fisheries and Game meetings yearly, providing reports and presentations to the Boards so they could make informed decisions. I am very familiar with the big green book of regulations. However, even with this knowledge, I was unaware that the map provided on the permit was not the same as the regulatory language. Following the citation, I did some digging to find the regulatory language on the ADF&G website. It took me about 10 minutes to find a map that reflected the language in regulation. A search for the regulations was not working; I had to use my knowledge of the website to find the regulatory language. The only reason I know how to find the language and the map that actually reflects the regulatory language is that I was part of a team that designed the ADF&G website. Figure 5 shows the map I finally found, and I was able to pull up the regulatory language. This language and map were not consistent with the map provided on the permit in 2022. If I, with all my knowledge of regulations and the design of the ADF&G website, could only with difficulty find the correct regulation and map, how is a reasonable person supposed to know where to look and that the map provided is incorrect? In my case, the judge had no choice but to uphold the citation and told me that I should not trust the information on the permit and that I, as a citizen, should do more research to ensure I was compliant with the regulation.

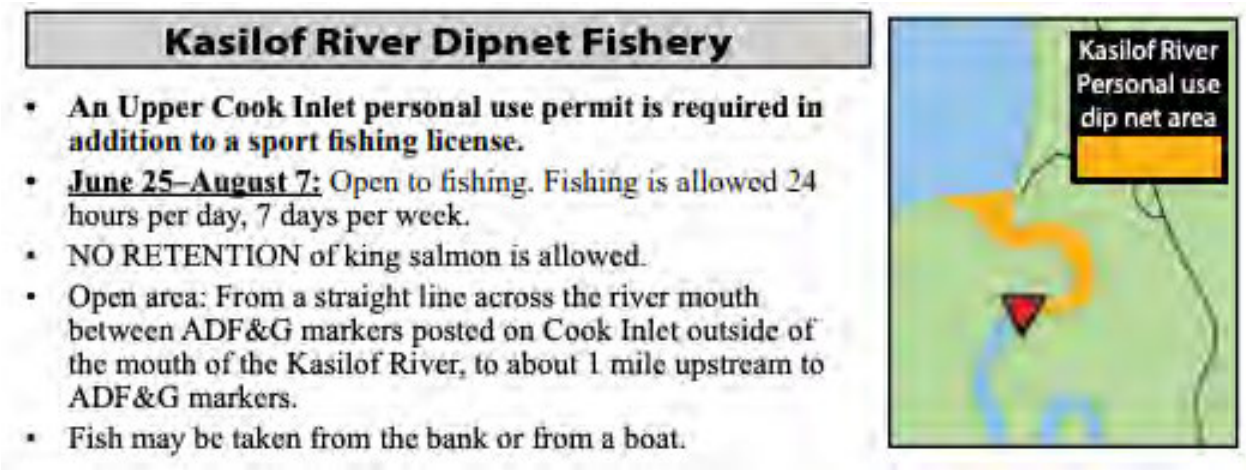

Figure 5: Regulatory Map

REGULATION:

5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan

(c.2.C) from a line between ADF&G regulatory markers outside the terminus of the river on the north shore beach at 60° 23.25' N. lat., 151° 17.98' W. long., and on the south shore beach at 60° 23.27' N. lat., 151° 18.64' W. long., upstream for a distance of one mile.

The Kasilof River is important for my family to fish each year. Our son, who is in college now, grew up fishing annually on this beach. We all look forward to it each summer, and we enjoy the salmon all winter. As multi-generational Alaskans, this activity is part of who we are.

A few years back, I helped design an internship as part of our national program for undergraduate students to encourage young people from underrepresented populations to get into the marine and coastal sciences. In the summer of 2022, I hosted a fellow as part of this program and her project for the summer was to conduct research on the social and economic benefits of community gardens and wild resource harvesting activity in Southcentral Alaska for underrepresented populations. A significant focus for us was the dip net fishery for families in Southcentral Alaska. Anchorage is one of the most diverse communities in the United States, hosting 3 of the top 5 most diverse high schools in the US. While my student was with her extended family on their annual multi-day salmon harvesting trip to the Kasilof River, she conducted informal interviews with diverse participants at the beaches in Kenai and Kasilof. My student had great conversations with participants who represent the diversity of our Southcentral Alaska populations that use the fishery as a communal family activity and for food security. Some of her respondents migrated to Anchorage from rural Alaska and many parts of the world as migrants and refugees. The fishery helps to connect them to the place. It provides an opportunity to do a healthy activity with their family. It also provides food security and healthy food for their families. In my many years of research as a fisheries anthropologist working in rural Alaska interviewing commercial, sport, and subsistence fishers, these are the same reasons other Alaskans participate in fishing. There are so many benefits of this fishery to Southcentral Alaska residents that go beyond putting salmon in jars and the freezer.

What is unfortunate is a lot of the people I saw cited and talked to after really can't afford the $220 citation. They were fishing to provide for their families. The look of shock on their faces as they lined up to get their citations was really uncomfortable to see. I can afford the citation. I can take time out to go to court. This proposal isn't about me.

I contacted the area manager and others in the Department, and they encouraged me to write a proposal once I got through the court appeal. The map on the permit was also fixed. In the summer of 2023, I received an updated permit with the correct map (Figure 6). The problem is that the map and the actual mouth of the river do not line up. The marker on the south shore is near the mouth of the river. It's in the correct location. It's very difficult for a dip net fisher to get close to the mouth on the south shore due to the wave action, except at low to medium tide. Figure 4 shows how far east of the marker up the river I was at the time of the citation. The marker on the north shore is well east of the mouth of the river. This means there is a diagonal line across the mouth, and it's difficult to track where you are while fishing, both in the water and from the shore. This makes it difficult for both the fisher and enforcement. I am requesting to move the north shore marker closer to the actual mouth of the river, creating a straight line across the mouth of the river. Most likely, this would not impact north shore fishers as it is too muddy to get too close to the mouth. Most fishers on that side stay well clear of the mouth due to the steep slope of the bank and the silt. Moving the boundary west to align with the mouth of the river would also make a straight line for dip net fishers from boats. The intent of this proposal is to create a fishery boundary that is clear to the fisher and easier to enforce. A reasonable person should easily be

able to identify whether they are in an area open to fishing based on the information they are provided and the boundary markers, and it should be very clear where the boundary is for enforcement.

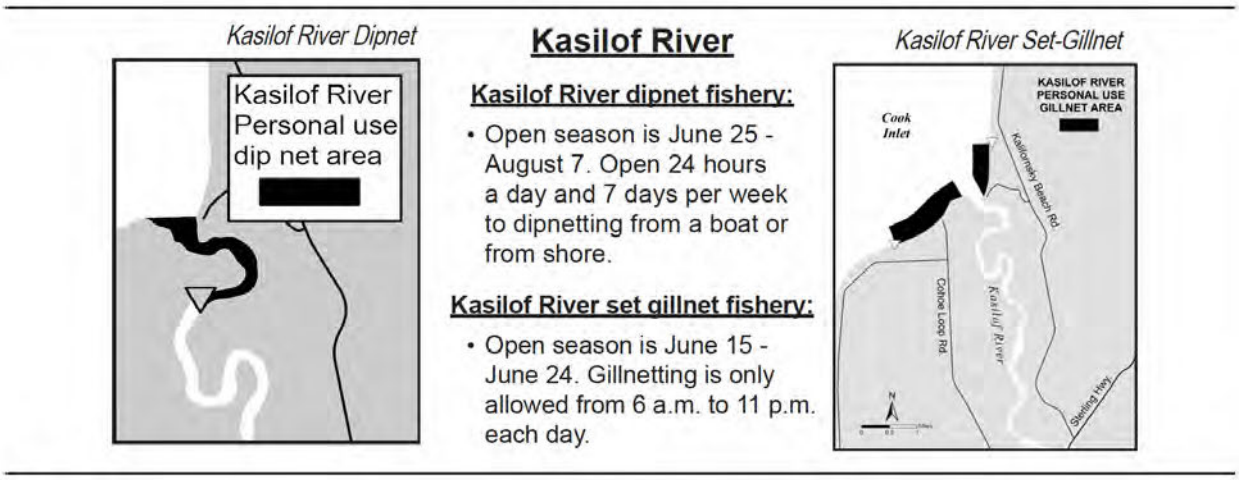

Figure 6. Map on Permit, 2023

PC101

Submitted by: Carmen Hollier
Community of Residence: Kenai, AK

Hello,

I am 7 years old. I am an ESSN fisherperson.

I help my family at our OBI buying station, on North Kalifonsky Beach.

I support proposal 128. There are Kasilof reds available to harvest, why wouldn't they be harvested, when the Kasilof River continously exceeds its escapemant goals.

My Dad submitted 143. ESSN fishing is soooooo slow my Dad bought a Bristol Bay permit. It would be great if he could home and be a set net permit holder and fisherman, in Cook Inlet, after the Bay!

I love the beach and our family set net fishing operation.

Plus I need to start making money for college, as I am sure that the DARK SIDE, will make set netting in Cook Inlet very difficult in 12 years.

Thank you for reading my comments,

Carmen K Hollier

Proposal 91: Support Proposal 97: Support Proposal 100: Support Proposal 119: Support Proposal 128: Support

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PC102

Submitted by: Carrie Hollier
Community of Residence: Kenai, Ak

Hello Members of Alaska Board of Fish,

I am a life long resendent of Kenai. I hold two Cook Inlet set net permits. I also operate a set net buying station for OBI seafooods. The buying station buys on average 50% of North Kalifonsky Beach's (NKB) salmon production.

I am writing to ask for support for proposal 128.

128 asks that whenever the Kasilof section is fishing NKB, withing 600 ft from MHT, WILL fish.

There is no biological reason not to support 128.

In 2009 ADFG extensive genetic data showed that Kasilof stocks, on all of NKB out to

1 1/2 miles, 50 % of the harvest was Kasilof stocks.

With Kasilof stocks that are tradtionally beach orientated, that percentage would be much higher, within 600 ft from MHT.

Being beach orientated, that is why the drift fleet, with many openers, cannot harvest many of the Kasilof stocks.

Further stock compositon in the 600 ft fishery on NKB, showed Kasiof stocks to be

59.5 % of the harvest, later in July.

It was the BOF intent that whenever the Kasilof section fished, so would NKB 600 ft.

With limited fishing time in the ESSN fishery, due to low King salmon returns, any opportunity to harvest these abundant Kasilof stocks should be used.

With the Kasilof River continually exceeding its BEG, sometimes almost 3 fold, good managment should harvset when time and area is available.

As far as the Action Plan for Kenai King salmon, if the preseason SEG is projected, I am in full support to have a limited fishery, with one 29 mesh deep net per permit. Fishing should maximize harvest, based on sockeye abundance returning to the Kenai and Kasilof rivers.

As a last resort, for some fishing time for ESSN, my children and I, whom we own 6 set net permits would support a dip net fishery.

I also support 143. With limited time in the ESSN fishery, and virtually no economic viability, permit holders may fish in more than one registration area per year.

Thank you,

Carrie J Hollier

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 84: Support	Proposal 85: Support	Proposal 86: Support	Proposal 87: Support
Proposal 88: Support	Proposal 90: Oppose	Proposal 91: Support	Proposal 94: Support
Proposal 95: Support	Proposal 96: Support	Proposal 97: Support	Proposal 99: Support
Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support	Proposal 103: Support
Proposal 105: Support	Proposal 106: Support	Proposal 107: Oppose	Proposal 108: Support
Proposal 109: Oppose	Proposal 112: Oppose	Proposal 119: Support	Proposal 122: Support
Proposal 123: Support	Proposal 124: Support	Proposal 128: Support	Proposal 129: Support
Proposal 139: Support	Proposal 140: Support	Proposal 142: Support	Proposal 143: Support
Proposal 144: Support	Proposal 150: Oppose	Proposal 151: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 165: Support	Proposal 169: Oppose

Submitted by: Gary Hollier
Community of Residence: Kenai, Ak

Members of the BOF,

I am Gary Hollier. I am a 70 year, life long resident of Kenai Ak. I have fished been an ESSN fisherman for 53 years.

I have fished predominately North Kalifonsky Beach (NKB) stat area 244-32.

NKB is south of the Kenai river, from the regulatory marker to about 4 miles south. I have fished gear from the beach to 1 1/2 miles offshore. My fishing operation is very family orientated, with 9 set net permits in the mix.

I did participate in the Bethe study, in 1996, which had observers on board for the entire season, to monitor and evaluate King salmon harvest in the ESSN fishery.

After the 2012 ESSN disaster, due to low King salmon runs to the Kenai River, I voluntarily started cutting my 45 mesh deep gear down to 29 meshes deep.

I am a strong advocate for the 29 mesh deep gear, I feel it definitely reduces King salmon catches, while still being viable in harvesting sockeyes.

I did participate in the 2015 Kintama study, about nets of different mesh depths and seeing how they "hung" in the water, on different stages of the tide cycle.

In 2023, I participated in another Kintama study, which centered around nets of different mesh depth and their harvest capabilities of sockeye and king salmon. I feel that it had positive results.

I submitted 4 proposals, 97, 100, 119, 128.

Now that Late Run King Salmon to the Kenai River is a stock of management concern, 97 and 100, I assume will be taken up in the Action Plan.

Proposal 97 asks for some limited fishery in the ESSN fishery, thru Julu 20, if the Preseason SEG is projected, (13,500+). I would urge the BOF to consider this idea in an Action Plan.

Proposal 119, asks for the Kasilof Special Harvest Area to be open, when King Salmon OEG to the Kenai River, cannot be projected. The reasoning is in the proposal, please consider.

Proposal 128, is asking that the 600 ft fishery, from MHT, on North Kalifonsky Beach, WILL fish any time that the Kasilof Section is open. The reasoning was explained in 128. The NKB 600 ft fishery, has 29 beach nets that could fish this area. Those 29 beach nets are owned by 9 fishing families.

At the BOF workshop, in October 2023, I submitted comments to Staff at that meeting, that had numerous graphs, genetic data, king and sockeye harvests, etc, which illustrates the biological reasoning for passing 128.

As of January 31, the data I submitted was not in the data base for on-time comments.

The BOF support Director, assured me that they would be submitted.

I have also submitted support or opposition to various proposals.

Thank you for your time and commitment to serve on the BOF,

Gary L Hollier

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 84: Support	Proposal 85: Support	Proposal 86: Support	Proposal 87: Support
Proposal 88: Support	Proposal 90: Oppose	Proposal 91: Support	Proposal 94: Support
Proposal 95: Support	Proposal 96: Support	Proposal 97: Support	Proposal 99: Support
Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support	Proposal 103: Support
Proposal 105: Support	Proposal 106: Support	Proposal 107: Oppose	Proposal 108: Support
Proposal 109: Oppose	Proposal 112: Oppose	Proposal 122: Support	Proposal 123: Support
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Proposal 140: Support	Proposal 142: Support	Proposal 143: Support	Proposal 144: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 165: Support	Proposal 166: Support
Proposal 169: Oppose			

Members of the Alaska Board of Fish,

I would like to respond to ADFG staff comments on proposal 128.

Proposal 128 would mandate that North Kalifonsky Beach (NKB) within 600 of MHT, set gillnets would fish, on or after July 1, whenever any portion of the Kasilof section is open. This would be in effect for the entire season.

Under What Would Be the Effect If The Proposal Was Adopted?

Staff comments were that this could increase the harvest of King and Sockeye salmon by an unknown on NKB.....

This is such genaric statement. Any opener, in any fishery will increase salmon harvest! That is why there are "openers".....to harvest salmon of an unknown quantitiy.

Staff in the past has stated that up to 70% of salmon entering the Kenai and Kasiof rivers, enter from the beaches north of the rivers.

Kenai stocks are harvested in the Northern District, sometimes as far north as Fire Island. It is common knowledge that Kasliof river stocks are prevelant on NKB.

One fact that is known, based on genetics reports, is that the percentage of Kasilof stocks will be higher in the NKB 600 ft fishery than in the Kasilof section.

Genetic report for July 19 & 21, 2018, showed that in the NKB 600ft fishery , the Kasilof stock was a mean of 51.4% to a 95% confidence of 59.9%.

It was stated in Staff comments that stock composition estimates specific to NKB had not been conducted since 2108. This was just an oversite by staff.

A genetic report on sockeye, for the NKB 600 ft fishery for 7/13 & 7/21 2019 showed the Kasilof river stock composition to be 59.5%

On the same dates, in the Kasilof river half-mile fishery, the stock composition was 27.3%.

In February 2024, another report came out.

It was titled:

Genetic Stock Compositon Estimates for the Upper Cook Inlet SOckeye Salmon Commercial Fishery, 2021-2023. Authored by Andrew W. Barclay

On July 6, 2021, stock composition for the 600 ft fishery in the entire Kasilof section and NKB 600 ft were conducted.

NKB 600 ft fishery- 96.6% Kasilof River stocks.

Entire Kasilof section 600 ft fishery - 67% Kasilof River stocks

Biologically, when any portion of the Kasilof section fishes, there is NO reason not to fish NKB.

I do appreciate all the hard work that ADFG staff have put into comments for the UCI meeting!

Thank you,

Gary L Hollier

10/10/2023

Dear Members of the Alaska Board of Fish,

I am a 50 plus year setnetter in the ESSN fishery. I fish south of the Kenai River in stat area 244-32.

To say the ESSN fishery is in tough shape, is not an exaggeration. Unless some changes are made to the Upper Cook Inlet Management Plan, the ESSN fishery is DOA!

The 2023 season was closed pre-season. The reason is that the minimum OEG for large King Salmon could not be predicted. At the annual meeting of the Kenai Peninsula Fishermen's Association, July 2023, the Commissioner of ADFG told the individuals in attendance, that the ESSN fishery might not fish for 5 to 10 years.

The OEG for Large King Salmon to the Kenai River is unattainable. In this PC, I have included some papers, which explain some reasons why this is.

I am in support of any proposals that would eliminate the OEG, or at least let some limited fishery proceed until a certain date, July 20 (proposal 97).

Or any number of proposals that allow fishing on a projected or achieved SEG. Some of these proposals are 45, 75, 76, 77, 78, 79, 80, 81, 82, 95, 97, 99, 100, 102, and 105.

After the 2012 ESSN fishery disaster, I started cutting my 45 mesh deep nets down to 29 meshes deep. My reasoning was I might be able to catch 50% less Kings and still have at least an 80% harvest of reds. After a decade of fishing the 29 mesh deep gear, I believe this has been successful in achieving my desired results. Unfortunately King Salmon returns to the Kenai River and the State of Alaska have continued to decline.

I am hoping the OEG can be eliminated. If not, during these times of low King Salmon runs, I think the BOF, should further incorporate 29 mesh deep gear and allow some limited fishing in the ESSN fishery. If no changes are made to the Management Plan the ESSN fishery is virtually done.

Thank you,

Gary L Hollier

Kenai, Ak.

LATE RUN

Appendices B3 and B4 summarize empirical estimates of late-run harvest and age composition for Chinook salmon 75 cm METF and longer. Appendix B5 summarizes annual empirical measures of relative and absolute abundance. Estimates in Appendices B3–B5 compose the data that inform the parameters of the state-space model, yielding the results below.

Abundance, Harvest Rates, and Age at Maturity

As with the early run, measures of late-run abundance exhibited common trends through time, and reconstructed estimates of run abundance generally passed through the center of the scaled individual measures (Figure 10). Runs were largest during 1986–1988 and 2003–2005, and have declined in size since 2004. From 2010 through 2015, when multiple indices and absolute assessments were available, estimates of total run, inriver run, and escapement were precise (CV = 0.03–0.06, Table 4). Before 2010, CVs were 0.12–0.22 for total run, 0.14–0.25 for inriver run, and 0.18–0.37 for escapement (Table 4). Coefficients of variation for recruitment were 0.20 or lower except at the beginning and end of the data series, when one or more age classes were missing (Table 4; Figure 11 third panel).

The harvest rate on late-run Chinook salmon 75 cm METF and longer ranged mostly between 30% and 50% of total run abundance from 1986 to 2011, but was less than 30% thereafter (Figure 11 fourth panel).

Chinook salmon 75 cm METF and longer were composed primarily of age-5 (1.3) and age-6 (1.4) fish (Table 5, Figure 12 middle and bottom panels). Late run Chinook salmon 75 cm METF and longer matured at age 5 (15–45%), age 6 (50–75%), and age 7 (0–10%; Figure 12 top panel). The trend toward earlier maturation was less evident in the late run (Figure 12 top panel) than in the early run (Figure 6 top panel).

Stock Productivity and Yield

Plausible Ricker SR relationships for the late run are depicted in Figure 13. The late-run stock was less productive during 1986–2015, on average, (α = 3.5; Table 6) than the early-run stock (α = 5.5; Table 3).

The Ricker recruitment residuals (Figure 11 bottom panel) are deviations in recruitment from that predicted by the Ricker SR relationship, reflecting time-varying changes in productivity after controlling for density-dependent effects. Late-run productivity reached a high for the 1999 brood year, then declined steadily until rebounding slightly for the 2009–2010 brood years.

Escapement leading to maximum sustained yield S_{MSY} was estimated to be between 11,731 and 31,832 (posterior median 18,477, CV 0.31; Table 6). Late-run S_{MSY} was estimated with somewhat less certainty than early-run S_{MSY} (CV = 0.24; Table 3). The optimal yield profiles (Figure 14 top panel) are slightly less steep and reach lower maxima than the early run, indicating less certainty about yield dynamics.

Expected sustained yield (number of fish over and above that necessary to replace the number of spawners, averaged over brood years 1986–2010) is also maximized near S_{MSY} (Figure 15). Under the reduced levels of productivity experienced during the most recent brood years for which we have data (2006–2010; Figure 11 bottom panel), expected yield declined to approximately 25% of the historical average (Figure 15).

Gary

From: [redacted]@alaska.gov]
Sent: Monday, December 30, 2019 4:11 PM
To: Gary Hollier
Subject: RE: King goal
Attachments: FMS17-02-Kenai River king salmon esc goal.pdf

Gary: the attached file is the Kenai River king salmon escapement goal report provided to the board at the 2017 meeting, which is where the large fish goal was first set. If you look at page 28 (copied in below), that is where the 11,700-32,000 goal around MSY could have been set. This report is heavy on statistical jargon, but maybe you can come to your own conclusion as to why the goal was shifted to the right, but it was. The department used OYPs (optimum yield profiles) and shifted this puppy to the right, setting the bottom end at 13,500. I am probably not the best person to get into the weeds and attempt to explain this, but if it is a desire by you to try and understand this, Adam Reimer in our local office if the person to talk to.

Escapement leading to maximum sustained yield SMSY was estimated to be between 11,731 and 31,832 (posterior median 18,477, CV 0.31; Table 6). Late-run SMSY was estimated with somewhat
less certainty than early-run SMSY (CV = 0.24; Table 3). The optimal yield profiles (Figure 14 top panel) are slightly less steep and reach lower maxima than the early run, indicating less certainty about yield dynamics.

-----Original Message-----
From: Gary Hollier [redacted]
Sent: Monday, December 30, 2019 1:53 PM
To: [redacted](DFG) <[redacted]@alaska.gov>
Subject: King goal

Hey [redacted] when the Department came out with the large king goal in 2014?, didn't they recommend 11,500 and the BOF put an additional 2000 on the low end for 13,500?
Thanks
Gary

Sent from my iPhone

RE: Shrinking salmon

From: [redacted]@alaska.gov>
Date: 02/27/2023 10:41
To: Gary Hollier <[redacted]
Cc: [redacted]@alaska.gov>, [redacted]

Gary,
I have asked a couple other biologists who specialize in escapement goal analyses on how the decreasing lengths might affect the large fish goals so I'll get back to you on that.

We have observed a small decline in length at age for Chinook salmon in the Kenai River recently. The observed decline in length/size is much much more from earlier age at maturity but we have seen a small decline in size at age also.

[redacted]

From: Gary Hollier <[redacted]>
Sent: Saturday, February 25, 2023 8:10 PM
To: [redacted]@alaska.gov>
Cc: [redacted]alaska.gov>; [redacted]>
Subject: Shrinking salmon

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello [redacted] ran across this article.
From ADFG , NOAA, University of Washington, looks like had input from Dr Dan Schindler.
This study was peer reviewed.
Talks about 10 % decrease in size and LENGTH of King Salmon from Alaska to the West Coast.
A Large Kenai River King has to be 75 cm, or I guess about 30 inches. A 10% decrease in length might have an impact on large king salmon sonar goals.
Could this loss in length of king salmon, over the past decade, contribute to not making the OEG or SEG of large king salmon to the Kenai River?
Has ADFG noticed a correlation in size drop for the different age classes of king salmon returning to the Kenai River?
Thanks
Gary Hollier

Shared via the

Sent from my iPhone

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have an empty boat."

A population under stress

Even as the department and Board of Fisheries work to conserve the king salmon returning to rivers around Alaska, there is concern about a more existential question: Why aren't more king salmon returning?

Poor king salmon productivity has been observed around Alaska for at least the last decade, according to Department of Fish and Game Cook Inlet Sport Fish Coordinator Matt Miller, and the fish that do return are smaller than they once were.

A 2020 paper published in the scientific journal Nature Communications found that the average body size of four different types of Alaska salmon — chinook, coho, chum and sockeye — were smaller in 2010 as compared to before 1990, the earliest baseline with sufficient data.

"Comparing mean body length pre-1990 to mean body length post-2010, Chinook salmon exhibited the greatest magnitude decline, averaging an 8.0% decline in body length," that paper says.

While there's little conclusive evidence that any one factor is negatively impacting Alaska's king salmon population, department staff say there's reason to believe that something is happening to fish once they reach the

ocean after leaving their natal rivers. Vincent-Lang said there is a solid

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"You've set a goal that almost becomes, at least in recent history ... untenable," he said. "You're not going to reach it, which leads to a scenario where we're shut down before the season starts."

Robert Ruffner, of Soldotna, sat on the Board of Fisheries in 2015 and then from 2016 to 2019. The department's move to large king salmon, he said, was one of the first issues the board took up during his tenure and marked a "fundamental shift" in how the state had previously counted salmon.

"The thing that I — today still — am really concerned about and don't understand is that, if we knew we had a down-going trend for large fish, why we made that change at that time," Ruffner said. "It really didn't make sense because we didn't have enough years of overlapping data to really understand what the percentages of a large fish were."

Setnetters have been vocal about their opposition to the way their fishery is managed. During a two-hour town hall with setnetters at the Cook Inlet Aquaculture Association last summer, Vincent-Lang repeatedly told the room, packed with roughly 100 people, that any concerns over fishery closures need to be taken up with the Alaska Board of Fisheries.

When the board convened earlier this month, local setnetters took action.

This is a PC

10/09/2023

Dear Members of the Alaska Board of Fish,

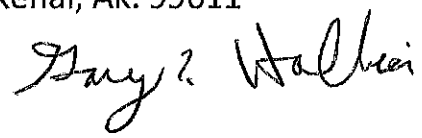
I am submitting a PC to support proposal 128, which I submitted. I will submit some pages that will be numbered.

1. Chart showing statistical areas in Upper Cook Inlet. Proposal 128 deal with North K-Beach (NKB) stat area 244-32. This proposal deals with fishing within 600 ft MHT on NKB, on or after July 1.
2. Here is a copy of an information request that I sent to the commercial fishing area manager. It shows his response. It deals with sockeye harvest in the 600 ft NKB fishery in 2020, 2021, and 2022.
3. This is copy from the Department, of the sockeye harvest in 2020, 2021, 2022. It shows the total harvest of sockeye in the NKB 600 ft fishery was 32,484.
4. This is a copy from Sport Fish staff, stating what the harvest was in Chinook salmon for those three years. The total harvest of Chinook was 10, of which 5 were Large Chinook. The 32,484 harvest of sockeye and 10 Chinooks, equated to a 3,248 red/king ratio. The large kings to reds ratio was 6,497.
5. The highlighted portion of this stock composition report, shows in the Kasilof section, 600 ft fishery, 7/16/2020 & 7/21/2020, Kasilof section has a 56.7% harvest of Kenai stocks and **36.5** harvest of Kasilof stocks.
6. This stock **compostion** harvest chart shows a couple things. This data was collected on 7/13/2019 & 7/21/2019. In the Kasilof section half-mile, the Kenai stock composition was 60.95, while the Kasilof stock composition was **27.3%.** While on the same dates in the NKB 600 ft fishery the Kenai stock composition was 36.2% and the Kasilof stock composition was **59.5%.** **There was a 218% higher stock composition harvest of Kasilof stocks in the North K-Beach 600 ft fishery compared to the Kasilof section half-mile fishery, in 2019.**
7. This graph in 2009, showing the entire North KB section from the beach out to 1 ½ miles had a Kasilof stock composition of almost 50% Kasilof stocks. This illustrates the volume of Kasilof stocks on NKB.
8. In proposal 128, at the March 2019 Statewide issue dealing with this issue, it was brought up on the record by BOF Member Robert Ruffner, what his intent was, and he asked that the BOF members concur. I transcribed his

comment, "if any portion of the Kasilof section is fishing to help control escapement into the Kasilof, at the Northern K-Beach setnetters, and the 600-foot fishery **WOULD** get to fish". This ACR passed 6-1. This ACR was passed as written as a "may" fish, while clear intent from the BOF was this area "**WOULD**" fish.

9. As stated in proposal 128, in 2022 the entire Kasilof Section fished July 2, 4, and 7th. NKB 600 ft was only allowed to fish July 7. ADF&G has asked numerous times for the BOF to give the "clear intent" on certain issues. In light of the fact that the Kasilof River has continually gone over the BOF mandated escapement goals, the last few years by several hundred thousand sockeye. NKB 600 ft fishery has ADF&G data, that shows it catches a higher proportion of Kasilof stocks than either the Kasilof ½ mile or Kasilof 600 ft fishery. I would hope that the BOF would give the Department "clear guidance" and pass proposal 128 as written. Passing this proposal would help with the ambiguity revolving around opening the NKB 600 ft fishery. When any portion of the Kasilof section is fishing NKB 600 ft fishery **WILL** fish. In the first 39 pages of the 2020-2022 CooK Inlet Area Commercial Salmon Fishing Regulations as near as I could count, there are 25-shalls, 21-mays, and 11 wills.

Thank you,
Gary L Hollier
Kenai, Ak. 99611



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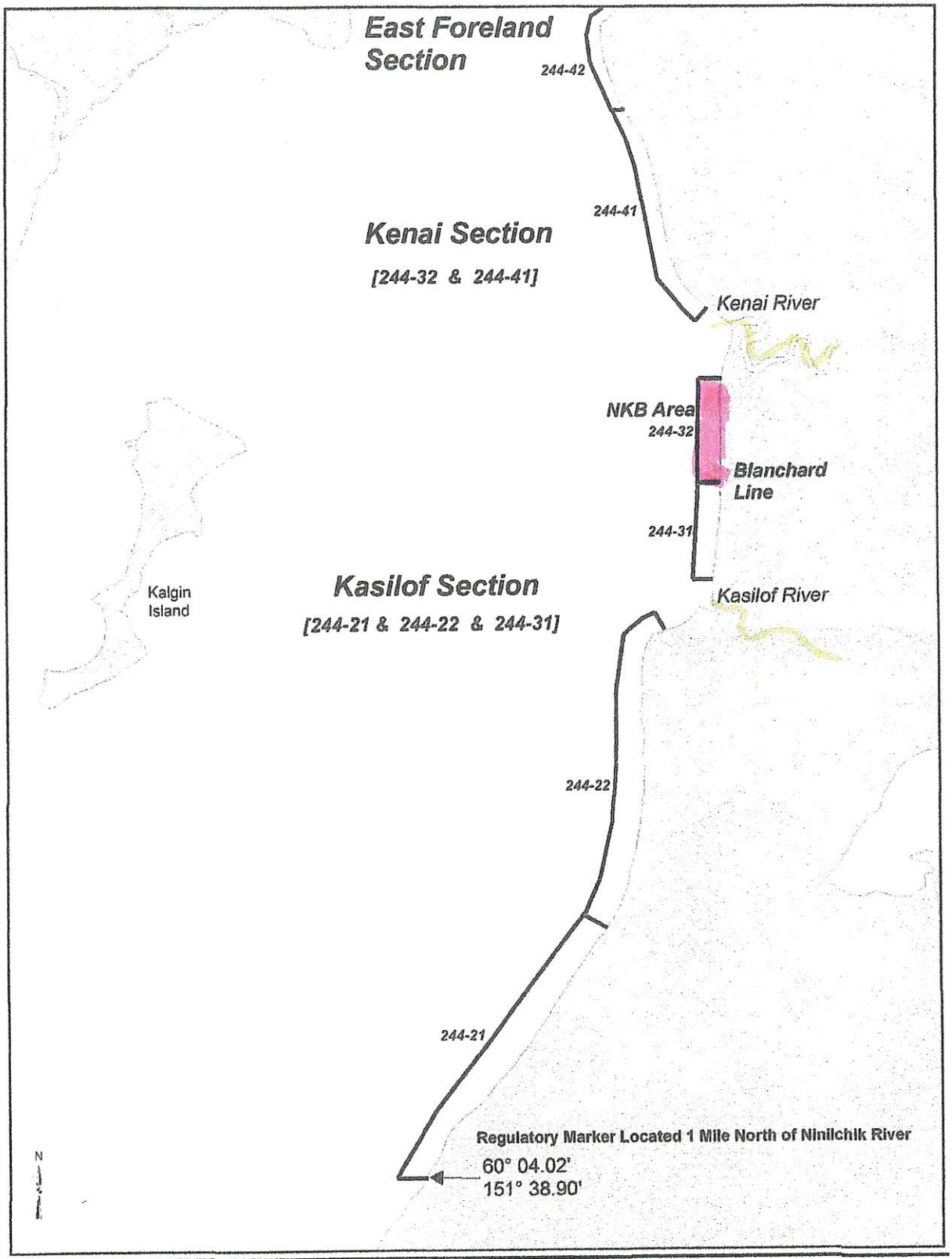

Figure 183-1.–Map of the Upper Subdistrict set gillnet fishery, which includes the Kasilof, Kenai, and East Foreland sections.

RE: 2022 info request

From: [redacted]alaska.gov>
Date: 02/13/2023 16:43
To: Gary Hollier <[redacted]>
Cc: [redacted]@alaska.gov>

Gary,

1) your division looks correct and the numbers seem reasonable based off what is in the tables.

2) Genetics sampling is run though a sub sample process to be representative of the ESSN fishery over the season. Thus there can be difficulties in deriving origin for specific openers or infrequently operated fisheries due to sample size. The best source for that information is the stock comp reports published by Tony Eskilin. See links below: Some caution on interpretation of the genetics data is to go apples to apples. It is very literal in what it describes.
http://www.adfg.alaska.gov/FedAidPDFs/FDS20-06.pdf
http://www.adfg.alaska.gov/FedAidPDFs/FDS21-11.pdf

3) Looks like zero kings and 2,942 sockeye were harvested on July 7 in the NKB stat area. This of course is prelim as we work through finalizing that report.

Let us know if you have any follow ups.

[redacted]

-----Original Message-----
From: Gary Hollier [redacted]
Sent: Wednesday, February 8, 2023 1:15 PM
To: [redacted]@alaska.gov>
Cc: [redacted]@alaska.gov>
Subject: 2022 info request

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Afternoon[redacted]
I got into the 2020 and 2021 AMR's.
They showed that in the dates that the 600 ft NKB fished for those years the red and king harvests.

In 2020 there were 3 kings and 9,541 sockeye harvested. That would put the sockeye to king ratio at 3180 reds/king.

In 2021 there were 17,291 reds and 7 kings harvested. For a 2470 red/king ratio.

I have three question:
1. Does my analysis on the harvest data seem accurate?
2. Does ADFG have any data on the 10 king salmon harvested in 2020 and 2021, if any of those were LARGE Kings?
I know that every King that comes thru my NKB OBI set net buying station, is analyzed for size, sex, scales, and genetics.
3. Seeing that the 2022 AMR is not published yet, could you please tell me the sockeye and king harvest for the NKB 600 ft fishery?
If any kings were harvested on July 7, is there any data on them?
The only day the NKB 600 ft fishery was fished independent of the Kenai Section, was on July 7. The other two days, July 11 and 14, the entire Kenai Section fished.

Sockeye - King harvests 2020, 2021, 2022
North Kalifonsky Beach - 244-32 - 600ft fishery

~~33~~ 4

~~Before~~ 7/

13

and
and
and
and

Batch Year is greater than 2019
Species Code is equal to / is in 420
Stat Area is equal to / is in 24432
Gear Code and Name is equal to / is in 04 - Set gillnet
Harvest Code is not equal to / is not in 21 , 22 , 23 , 24 , 41 , 42 , 43

Sockeye Harvest North K-Beach (244-32) 600 ft 2020-22,

24432

420

Date Fishing Began (MM/DD)	Number Of Animals (sum) 2020	Number Of Animals (sum) 2021	Number Of Animals (sum) 2022
07/01		2,162	
07/02	1,897		
07/03		3,072	
07/04	684		
07/05		3,110	
07/06	2,260	2,243	
07/07	1,796	2,728	2,942
07/08	629		
07/14		3,216	
07/15			
07/16	2,275		
07/17			
07/18			
07/19			
07/20		3,460	

All Sockeye Halvested in 600ft Fishery NKB - 32,484 } 2020 2021 2022

All Sockeye Harvested prior to 7/8 - NKB 600ft - 26,120 } 2020 2021 2022

10 Kings harvested 2020, 2021, 2022 } 32,484 ÷ 10 = 3,248 sockeye/King

5 Large Kings } 6,497 sockeye/per Large King

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4

No Subject

From: [redacted]@alaska.gov>
Date: 02/15/2023 12:11
To: [redacted]
Cc: [redacted]@alaska.gov>, [redacted]
[redacted]@alaska.gov>

Hi Gary,
See below for your data request and let me know if you have further questions.

ESSN Chinook salmon harvest and number of samples collected by size for North K-beach (244-32) stat area for periods restricted to 600ft from high tide mark, 2020-2022.

	Size			Total Reported
Year	Small	Large	Total	Harvest
2020	1	0	1	3
2021	2	5	7	7
2022	0	0	0	0

[redacted]
Fishery Biologist
Alaska Dept. of Fish and Game
43961 K-beach Rd. Ste B.
Soldotna, AK 99669>

[redacted]

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Appendix D1.–Upper Subdistrict set gillnet (Central District), 2020: stock composition (%) and stock-specific harvest estimates, including the final number of samples used in the genetic analysis (n), mean, 90% credibility interval (CI), and standard deviation (SD).

All sections (excluding Kasilof Section July 16 and 21 periods)

Dates: 6/23–7/22	Stock composition (n = 371)				Harvest = 274,412			
		90% CI				90% CI		
Reporting group	Mean	5%	95%	SD	Mean	5%	95%	SD
Crescent	0.1	0.0	0.4	0.2	207	0	1,155	570
West	0.3	0.0	1.8	0.7	902	0	4,808	1,878
JCL	1.1	0.0	2.5	0.8	2,899	28	6,886	2,159
SusYen	0.7	0.0	3.1	1.1	1,867	0	8,539	2,959
Fish	3.0	1.0	5.4	1.4	8,122	2,777	14,806	3,737
KTNE	1.9	0.6	3.8	1.0	5,335	1,678	10,442	2,797
Kenai	50.3	44.5	56.5	3.7	137,947	122,088	154,944	10,086
Kasilof	42.7	36.8	48.4	3.5	117,134	100,969	132,704	9,648

Kasilof Section 600 ft[a]

Dates: 7/16 & 7/21	Stock composition (n = 366)				Harvest = 7,765			
		90% CI				90% CI		
Reporting group	Mean	5%	95%	SD	Mean	5%	95%	SD
Crescent	0.5	0.0	2.3	0.8	40	0	180	64
West	0.5	0.0	2.2	0.8	41	0	174	66
JCL	0.4	0.0	1.4	0.5	30	0	108	37
SusYen	0.4	0.0	1.9	0.8	31	0	151	63
Fish	3.9	1.9	6.2	1.3	300	150	483	99
KTNE	1.1	0.1	2.9	0.9	87	11	228	72
Kenai	56.7	51.3	62.0	3.2	4,405	3,983	4,817	251
Kasilof	36.5	31.5	41.5	3.0	2,832	2,443	3,220	232

Note: The 90% credibility intervals of harvest estimates may not include the point estimate for the very low extrapolated harvest numbers because fewer than 5% of iterations had values above zero.

Note: Stock composition and harvest estimates may not sum to 100% due to rounding error.

[a] This mixture represents fishing periods restricted to within 600 feet of the mean high tide mark.

The Kasilof Section 600ft Ashely
7/16 & 7/21 - 2020
Had a stock composition of
56.7% Kenai stocks
36.5% Kasilof stocks

Appendix D1.–Upper Subdistrict set gillnet (Central District), 2019: Stock composition (%) and stock-specific harvest estimates, including the final number of samples used in the genetic analysis (*n*), mean, 90% credibility interval (CI), and standard deviation (SD).

All sections (excluding July 13 and 21 periods)

Dates: 6/27–8/3	Stock Composition (n = 347)				Harvest = 741,865			
		90% CI				90% CI		
Reporting Group	Mean	5%	95%	SD	Mean	5%	95%	SD
Crescent	0.5	0.0	2.4	0.9	3,382	0	18,062	6,800
West	1.2	0.0	4.3	1.6	8,870	0	31,963	11,515
JCL	0.3	0.0	1.0	0.4	2,024	0	7,675	2,845
SusYen	0.1	0.0	0.8	0.4	1,008	0	6,150	2,846
Fish	0.4	0.0	1.8	0.6	3,200	0	13,003	4,564
KTNE	1.0	0.0	3.2	1.1	7,300	0	23,728	8,156
Kenai	85.7	80.6	90.2	3.0	635,475	597,751	669,382	22,509
Kasilof	10.9	6.8	15.5	2.7	80,607	50,449	114,738	19,678

Kasilof Section half-mile[a]

Dates: 7/13 & 7/21	Stock Composition (n = 368)				Harvest = 31,111			
		90% CI				90% CI		
Reporting Group	Mean	5%	95%	SD	Mean	5%	95%	SD
Crescent	0.4	0.0	1.8	0.7	121	0	574	206
West	1.3	0.0	5.9	2.0	390	0	1,845	620
JCL	0.1	0.0	0.8	0.3	43	0	243	102
SusYen	8.3	4.5	12.6	2.5	2,598	1,390	3,930	771
Fish	0.9	0.1	2.3	0.7	283	16	703	218
KTNE	0.8	0.0	3.1	1.1	247	0	958	331
Kenai	60.9	54.7	67.0	3.8	18,942	17,023	20,830	1,169
Kasilof	27.3	21.9	32.6	3.3	8,487	6,806	10,134	1,015

Kenai Section, North K-Beach 600ft[b]

Dates: 7/13 & 7/21	Stock Composition (n = 367)				Harvest = 11,303			
		90% CI				90% CI		
Reporting Group	Mean	5%	95%	SD	Mean	5%	95%	SD
Crescent	0.7	0.0	2.9	1.0	80	0	326	112
West	1.1	0.0	5.5	1.9	129	0	627	215
JCL	0.1	0.0	0.7	0.3	14	0	79	32
SusYen	0.3	0.0	1.6	0.6	37	0	181	70
Fish	0.2	0.0	0.9	0.4	19	0	107	40
KTNE	1.9	0.0	4.6	1.5	210	0	524	175
Kenai	36.2	30.9	41.4	3.2	4,086	3,496	4,685	361
Kasilof	59.5	54.3	64.5	3.2	6,727	6,136	7,295	359

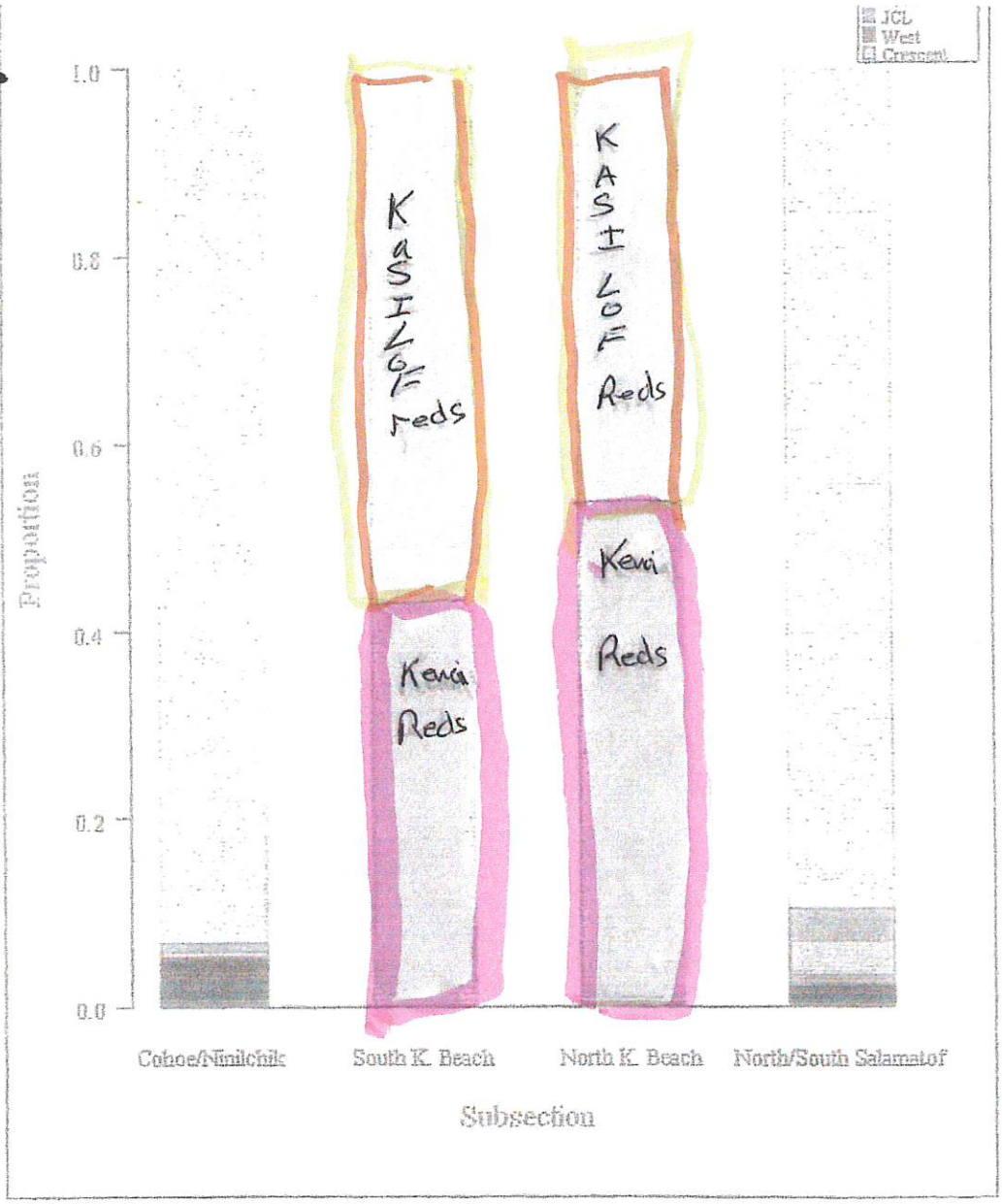
Note: The 90% credibility intervals of harvest estimates may not include the point estimate for the very low harvest estimates.

Note: Stock composition and harvest estimates may not sum to 100% due to rounding errors.

[a] This mixture represents fishing periods restricted to within half-mile of the mean high tide mark

[b] This mixture represents fishing periods restricted to within 600 feet of the mean high tide mark.

2



Note: There are 2 subdistricts for each section and they are displayed from south to north.

Figure 6.–Stock composition estimates for the Kasilof and Kenai/EF sections set gillnet fisheries (Central District, Upper Subdistrict) divided into subsections from 2009.

In 2009 close to 50% of the North-K-Beach harvests was comprised of Kasilof Sockeye.

http://www.bing.com/search?q=dancing+with+the+stars&form=MSNH14&qs=AS&sk=&... 2/28/2011

Gary Hollier 136

Proposal 128

Well, it seemed we reviewed those numbers and found them to be accurate to best of our knowledge. Okay, great. Thank you. So So then it just strictly becomes, you know, does the department have enough flexibility to use this and, and when it's when it's used to limit other fishing hours, I-I can certainly understand why the department would probably be reluctant to use it because it's a relatively small area and if they get the fish to try to keep Kasilof. Escape and under control that, and it counts against ours and other people in the fisheries, that they would not want to do that. So, um, for for all those reasons, I would, I would hope that we would support that, this, this proposal that, you know, if, if any portion of the Kasilof section is fishing to help control escapement in the Kasilof at the Northern K-Beach, setnetters, and the 600-foot fishery would get to fish. And that's, that's my position. I'll be in support. Thank you

The above is Transcribed from Board of Fish Member Robert Ruffner at the 2019 March statewide meeting. The discussion was about what his and the BOF's Intent on fishing North K-Beach 600 ft Fishery. Member Ruffner asked the Department if all data submitted in the support of this issue was accurate? In yellow was the Department's Response. MR. Ruffner went on to state at if any portion of the Kasilof section is fishing - North K-Beach would get to Fish! Even tho the proposal passed as a MAY, the BOF's Intent was for a would or will

PC104

Submitted by: Jayden Hollier
Community of Residence: Kenai, Ak

Hello Board of Fish,

I support proposal 128.

128 ask's for North Kalifonsky Beach to WILL fish whenever the Kasilof section is fishing.

This proposal makes biological sense. There are surplus Kasilof stocks, harvest them!

If no ESSN fishing is allowed under the OEG, I support a dip net fishery, for the ESSN fleet.

I support 143, which lets UCI set net permit holders fish in more than one area.

Thanks,

Jayden J Hollier

Proposal 91: Support Proposal 97: Support Proposal 100: Support Proposal 119: Support
Proposal 128: Support Proposal 143: Support

PC105

Submitted by: Troy Hollier
Community of Residence: Kenai, Ak

Dear Mr Chairman and Alaska Board of Fish Members,

I am a dual Cook Inlet Set Net permit holder.

I support proposal 128. The proposal asks that North Kalifonsky Beach (244-32), WILL fish from 600 ft from MHT, whenever the Kasilof section is fishing, on or after July 1.

The Kasilof River has continually exceeded, the BOF mandated escapement goals.

I understand during times of low King salmon abundance to the Kenai River, the ESSN fishery has been and will be severely restricted.

Yet if ADFG decides that a Kasilof opener is warranted, to havest Kasilof stocks, then NKB should fish. Many genetic reports, show Kasilof stocks are a large component of the harvest on NKB.

I support 143, put in by my Dad. He setnetted Cook Inlet for many many years. With the restrictions and closures, he went to Bristol Bay to fish. He should be able to return to Cook Inlet as a permit holder after the Bay.

If the BOF decides, no ESSN fishing below the OEG (15,000), I would support a dip net fishery for the ESSN fishermen!

Thank you,

Troy M Hollier

Proposal 81: Support Proposal 97: Support Proposal 100: Support Proposal 119: Support
Proposal 128: Support Proposal 143: Support

Submitted by: Sarah Hollier-Pellegrom
Community of Residence: Kenai

I fully support proposal 128.

Thank you

Sarah Hollier-Pellegrom

Proposal 128: Support

February 11, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a 42 year Alaska resident and have fished the Kenai River, along with my family, every year of those 42 years. I raised 4 sons who have also fished and enjoyed the river, and now my wife and I share our home on the river with our grandchildren. Truly a generational legacy.

The Kenai River and its fisheries is truly an invaluable resource that must be protected. The demise of the run of magnificent king salmon is a sad chapter in Alaska's history. Every effort to save and rebuild the king run must be a top priority.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in the last couple years to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Thank you.

Harold L. Hollis

Sincerely,

Harold Hollis
Sterling, AK

Submitted by: Keith Holtan
Community of Residence: Kenai, AK

I’m in favor of Proposal 83. The current Kenai River Late-Run Salmon Management Plan lacks the necessary tools for ADFG to manage a depleted king salmon stock. Proposal 83 allows more options for ADFG to protect our iconic king salmon.

Proposal83: Support

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I’m part of the commercial and subsistence fisheries in Cordova, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Hayley Hoover
[redacted]
Cordova, AK

Submitted by: Charles Horton
Community of Residence: Richmond, VA

I strongly support proposal 83 to protect King Salmon populations. It is abundantly clear that the current system allows for too much initial mortality, and that catch limits should initially be much more conservative than they currently are and only relaxed once a viable number of kings have achieved the escapement goal.

King salmon are an iconic member of Alaska's aquatic fauna, and we cannot fumble our opportunity to protect their future populations.

Proposal83: Support

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

Being in a commercial family, as well as a harvester of salmon, halibut and rockfish, I am a regular consumer of the tasty fish we get from the ocean. Without the addition of the hatchery fish, I am afraid the salmon numbers would not be enough to feed our family, the local families, and the commercial market to which these fish are sent to. I'm a strong supporter of hatcheries for all varieties of salmon and trout.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Mary Howarth-Hernandez
[redacted]@[redacted].
Sterling, Alaska

PC112

Submitted by: David Hubbard
Community of Residence: Sterling, Ak

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The anglers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 151: Oppose	Proposal 152: Oppose	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 167: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Support	Proposal 194: Support	Proposal 195: Support
Proposal 196: Oppose	Proposal 197: Support	Proposal 198: Oppose	Proposal 199: Oppose
Proposal 200: Support	Proposal 201: Oppose	Proposal202: Support	Proposal 203: Oppose

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PC113

Submitted by: Gavin Hudkins
Community of Residence: Chelan, WA

My name is Gavin Hudkins and I am an Eastside Setnetter. I was raised commercial fishing alongside my Grandparents, Parents and Siblings and while I have had a short 20 years on this earth, the history that my family has created on Salamatof Beach is rich beyond my years. 100 years to be exact this year. I am an UCI permit holder, a Kenaitze Tribal Member, and currently attending school at University California, San Diego, majoring in Biochemistry. The work ethic that commercial fishing has given me is likely unattainable in any other occupation. At a young age, I was taught how to work tirelessly, fix before you buy new and the importance of trust, respect and listening/watching to learn before I was even old enough to understand the unique legacy my Great-Grandfather had created for his family.

A few key statements in regard to proposals that I oppose and support are below:

The actions taken at the 2020 BOF meeting to protect late-run Kenai king salmon, created an unattainable Optimum Escapement Goal (OEG) which in turn closed the ESSN 2023 season, leaving many 100 year old commercial fishing businesses without the opportunity to harvest the excess sockeye salmon to feed the world, without opportunity to pay their bills and support their families.

The Optimum Escapement Goal (OEG) adopted in 2020 has closed the fishery and businesses cannot survive a fishery that gets zero opportunity based on a small harvest of a non-target stock of Kings.

The pairings in place are NOT equitable and do not share the same burden of conservation among all user groups.

Interaction with King Salmon happens in EVERY other fishery in Upper Cook Inlet that harvests Kenai and Kasilof sockeye and ONLY, the Eastside Setnet Fishery, was left with zero opportunity in 2023.

I believe that there is some opportunity for harvest in the ESSN fishery between the Large King Sustainable Escapement Goal (SEG) 13,500-27,000 and Optimum Escapement Goal (OEG) 15,000-30,000.

I strongly oppose proposals 90 and 106, in addition to proposals: 101, 112, 141, 150, 153, 154, 155, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232.

I strongly support proposals: 75, 76, 77, 78, 80, 81, 82, 83, 85, 86, 87, 88, 91, 94, 97, 99, 100, 102, 103, 110, 114, 116, 117, 119, 120, 121, 122, 123, 124, 125, 128, 129, 130, 131, 133, 143, 144, 145, 146, 147, 148, 151, 152, 160, 161, 163, 164, 173, 176, 177, 178, 179, 180, 181, 185, 186, 187, 189, 190, 193, 195, 196, 197, 198, 199, 200, 211, 215.

Thank you for your time.

Gavin Hudkins

[redacted]

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 80: Support	Proposal 81: Support	Proposal 82: Support	Proposal83: Support
Proposal 85: Support	Proposal 86: Support	Proposal 87: Support	Proposal 88: Support
Proposal 90: Oppose	Proposal 91: Support	Proposal 94: Support	Proposal 97: Support
Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support
Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support	Proposal 112: Oppose
Proposal 114: Support	Proposal 116: Support	Proposal 117: Support	Proposal 119: Support
Proposal 120: Support	Proposal 121: Support	Proposal 122: Support	Proposal 123: Support
Proposal 124: Support	Proposal 125: Support	Proposal 128: Support	Proposal 129: Support
Proposal 130: Support	Proposal 131: Support	Proposal 133: Support	Proposal 141: Oppose
Proposal 143: Support	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 150: Oppose	Proposal 151: Support
Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose
Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose	Proposal 160: Support
Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support
Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose	Proposal 171: Oppose
Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose	Proposal 176: Support
Proposal 177: Support	Proposal 178: Support	Proposal 179: Support	Proposal 180: Support
Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support	Proposal 186: Support
Proposal 187: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Support	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

Submitted by: Pete Imhof
Community of Residence: Chugiak

As a lifelong Alaskan and seeing the mixed stock issues on the kenai it's time to take a conservative approach, I'm in support of proposal 83 which outlines a conservative approach, as I hear rumors of reducing the OEG I'm in disbelief, as we well know we're lacking fish in the hole northern district and the thought of lowering escapement is disturbing. Think of it as a shock with little nitrogen to absorb the bumps, our fisheries have very little nitrogen, we can not survive ocean conditions and sport intercept, we're hitting the axle hard.. ask yourself what fishery have we ever raised the escapement on kings, then ask yourself after lowering the goals have we ever seen it become a robust fishery that it once was.. thanks for reading. Appreciate your time.

Proposal83: Support

I'M commenting on proposal 238, to reduce horespower on the little su, i have been in a motorized vessel since 1978 on the little su, i fish there more frequently then most, im not a guide, but have been fortunate to have owned and operated various boats and motors over the years. By no means am i an expert im giving you the board my take on horse power. My first boat was a 16' semi vee with a 30 hp prop, then a 18' 40 hp jet, then a 35hp prop when the kenai river lowered the hp to 35, then up to 50 HP when 35 wasn't good enough on the kenai, boats varied from flat bottom to semi vee, i currently own a 22' with a 140 hp jet and a 20' willies with a 50 hp prop that on occasions i run the little su with, so my conclusion is that its not horse power, its hull displacement that causes issues, so back to my first boat, 16' 30 hp prop caused way more wave action then my 22' with a 140HP, and my 20' willies which is the premere boat on the kenai is not the boat for the little su, once again hull displacement and over all weight has way more effect then my flatbottom 140HP. lastly as a life long particpant on the little su and many other system through out alaska i will say im not seeing erosion,i still see the same beaches and even root wads i seen when i was a kid... thank you the board for reading my comment...

Proposal 238: Oppose

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i'd like to clarify my proposal 161 limiting guide hours on the banks of the kenai during the month of july through aug 15, I didn't write this for me, i wrote it for the many residents and non resident /non guided that are having a difficult time finding a gravel bar to fish from, which leads to banks that were not typically fished in the past, exposing the risk of more habitat issues .I originally proposed a 6AM to 6PM duration for guides, which i think will cause even more issues with guide/residents trying too fish. Since most residents don't really get fishing until after 6 AM i'd be in favor of a cut off in the afternoon to give local residents and non residents/non guided a oppurtinity to fish with less pressure. This issue im bring up will have to be delt with one way or another as guides are adding boats and more guides coming in, and lack of kings for the near future it will intensify.. thanks for taking the time to read.

Proposal 161: Support

My proposal 163 clarification, no guided fishing from a boat between the hrs of 6PM to 6AM on the kasilof river, and no anchoring of a boat prior to 6AM, i for see guides anchoring prior to 6AM when residents are attempting to fish. Currently the kasilof is a heavily guided fishery that is being fished hard during the first run of kings, its not uncommon to have 20 to 30 guide boats too one resident boat,its my belief that residents are being displaced, also we didnt make escapement goals on wild fish into the crooked creek fishery last season. thank you for reading

Proposal 163: Support

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I participate in the subsistence, sport, commercial, and personal use fisheries, and my home port is in Whittier, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Forest Jenkins
[redacted]@[redacted].
Whittier, Alaska

January 30, 2024

Dear Chairman Wood and Board of Fisheries members:

While commercial interests are important, they really serve a very small part of the fishing (sport and commercial) community. You really need to take into account the issues associated with commercial fishing, primarily the impact on harvest by catch and impact on overall stream and population health.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Thank you for your thoughtful consideration of these facts and issues. The future and health of Alaskas Southcentral salmon populations depend upon it.
Mark Johannes

Sincerely,

Mark Johannes
Anchorage, AK

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I’m part of the commercial and personal use fisheries in Cordova, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

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Sincerely,
Eli Johnson
[redacted]
Cordova, AK

Submitted by: Greg Johnson
Community of Residence: Vancouver,Washington

Greg
Johnson

-UCI Setnetter

-Kenai River Late Run King

Salmon Action Plan

Chairmen Board Of Fish Members

My wife and our two sons have setnet sites in the ESSN area located in the middle of Kalifornsky Beach. My fishing background includes 16 years fishing; as a deckhand, captain and permit holder in the South Kbeach subsection. Followed by 12 years as a owner/operator in Prince William Sound drift fishery which was followed by the purchase of our current setnet site in the North K-Beach subsection, which we purchased 20 years ago. Additionally, I own a Columbia River gillnet operation and was an industry representative on the Salmon Advisory Subpanel; an advisory group for the PFMC for 12 years as well as a past KPFA Board member.

I believe there is a opportunity to craft regulations within the Kenai River Late Run King Salmon Management Plan or Action Plan to provide limited abundance based sockeye directed openings when Kenai River Kings are forecasted to be within the SEG and OEG range. Within this plan we support the use of a single 29 mesh net per permit. Fishing periods should range from 6 to no more than 12 hours. These openings together would not exceed 24 hours per week. All waters would be open within the ESSN fishery and would not be restricted to 600 feet; as the difference between utilizing 600 ft restriction and one net per permit are minimal. Furthermore, many families don't have sites within the 600 ft and would be excluded without providing any meaningful conservation benefit.

I have supported investigations leading to science that can quantify chinook savings via Time Area and Gear strategies. I believe it is important to implement a limited fishery to further evaluate the limitations mentioned above. It is critical to the Setnet fishery, community and my family that a conservative conservation based package of regulation be put forth by this Board during this cycle.

I will be attending The UCI Board of Fish meetings and look forward to reasonable discussion on this matter as well as other proposals before the Board.

We are family operation representing 7 permits.

Greg Johnson and Family

[redacted]

CC:

Patricia Johnson

Mason Johnson

Merrick Johnson

Zackary Little

Submitted by: Donald Johnson
Community of Residence: Soldotna

"NMFS proposes Amendment 16 to the Fishery Management Plan for the Salmon Fisheries in the Exclusive Economic Zone (EEZ) Off Alaska (Salmon FMP) and associated implementing regulations. If approved, Amendment 16 and this proposed rule would establish Federal fishery management for all salmon fishing that occurs in the Cook Inlet EEZ, which includes commercial drift gillnet and recreational salmon fishery sectors. The fed is claiming this action is necessary to comply with rulings from the U.S. Court of Appeals for the Ninth Circuit and the U.S. District Court for the District of Alaska, and to ensure the Salmon FMP is consistent with the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act). This action is intended to promote the goals and objectives of the Magnuson-Stevens Act, the Salmon FMP, and other applicable laws."

———

I say the only reason the "federal government" is trying to institute fisheries management in Cook Inlet federal waters is because Alaska has refused to do it. The fed gave the state a chance to do it and they basically messed it up. This is a pretty big deal. I would rather the state maintain management of Alaska's salmon fisheries but now they've got the Ninth Circuit and the Alaska District courts involved…

The only good I see to the feds getting involved is the funding they bring. We aren't supposed to bring politics into this but our politics have been incorrectly running our fisheries for as long as I can remember since the late 70's anyway, and it's always been comm fish against the sport. I say that if they don't start managing for survivability instead of yield there won't be anything left to manage regardless of who's table you sit at, and that means we all suffer a lot.

Amendment 16 to the Salmon Fishery Management Plan would implement federal management in Cook Inlet within an Exclusive Economic Zone, EEZ for the first time in history. This action—Amendment 16 and the proposed rule—would cause two separate managers of salmon fishing in the same Cook Inlet… The State of Alaska would continue to manage all salmon fishing in state waters and the fed managing anything outside the three mile limit. Can you see the potential confusion? Federal Drifters catching fish at 3.1 miles off shore and drifting into 2.9 miles offshore, being boarded by State enforcement, searched, ticketed or just prevented from fishing. The same happening with State Drifters drifting into Federal waters and Federal enforcement.

Federal management would implement new requirements for commercial drift gillnet vessels fishing in the Cook Inlet EEZ. Fishing in the EEZ would supposedly happen on Mondays and Thursdays from 7 a.m. to 7 p.m. beginning on or after June 19 each year until either the total allowable catch is taken or August 15. Commercial fishing vessels would have to obtain a federal permit, maintain a fishing logbook, and have a vessel monitoring system installed on their vessels. Commercial fishing vessels would not be allowed to participate in the federal fishery at the same time while participating in the state fishery. So drifters won't be able to fish both inside and outside the three mile limit, like now. And who knows if the fed will try to enforce the above same regulations on the charter boat fleet…

UCIDA believes that if they manage for Optimum Sustained Yield, OSY, then by definition we should have plenty of opportunity for people who are in-river or near-shore fishermen. As opposed to now, where we're managing for the bottom of the curve, BEG on kings instead of the top. I don't believe a single fishing group like (UCIDA) should be able to upend Cook Inlet fisheries management like this which has taken 50 years worth of state input to build.

Amendment 16 only mentions Optimum Sustained Yield for sockeye's. What about Optimum sustained yield for kings that are susceptible to over harvest? They will absolutely need to tweak the Magnusun-Steve's Act big-time to save Alaska's kings. Alaska has "allegedly" figured out how to manage its kings but the Magnusun won't have a clue. The feds could pull the plug on everyone in Cook Inlet just because they don't have a clue about how to save its kings from destruction.

I have been telling the Alaska BOF since 1980 that it's been managing for minimum escapement on everything to cause maximum commercial fisheries profits. The BOF ignored my warnings, allowed everything from crab and shrimp to whales be commercially ground down to biological minimums so everything began degenerating. Now we have minimal crab larvae to feed juvenile kings so kings end up failing to be able to make the feeding jump from larvae to capelin and starve to death down in the silent abyss where nobody is watching. As our kings fade away into oblivion our Beluga's can't find the kings they use to find in Cook Inlet and they end up also starving to death in the silent abyss while nobody can figure out what's killing them.

UCIDA has no idea that the fed will shut them down for the entire year when it discovers these Cook Inlet kings and beluga's are endangered species being impacted by Cook Inlet commercial fisheries. They somehow think the fed will give them more fish when it is much more likely that the fed will figure out what the Alaska BOF has been ignoring and shut them down period. The fed might have given the drifters more fish if we were dealing with a healthy Cook Inlet fishery but I don't think we have that. More likely that the fed will dump all the OSY, BEG or Maximum Sustained Yield, MSY garbage and just pull the plug out and close everyone down for the entire season. Maybe just leave some personal use or subsistence going.

This is an Alaska issue that should have been resolved by Alaskan's but they just couldn't do it. Setting up federal management anywhere in Alaska is a really, really bad illogical precedent. Do you think the Cook Inlet drifters thought about what the feds and courts would do to the Kenai River area dip net fisheries? The fed could open up dip netting on any federal land it controls. It could open that access up to all citizens of the U.S.! This is the kind of stuff the fed is capable of doing. What would UCIDA say if 300 million U.S. citizens were being calculated into the comm fish / sport fish allocation equation? I don't think UCIDA really appreciates just how crazy the federal government could become. I really can't imagine what UCIDA is expecting to get out of trying to ride a monster.

The fed is a real monster and it won't have a problem killing off everyone's livelihoods in Cook Inlet for a few eagles, beluga's or king salmon. Maybe UCIDA just thought it wants someone looking over the State's (BOF) shoulder? I am officially predicting that they will get a lot more than that. I say it's more than possible that something really bad will come out of the BOF meeting up in Anchorage, that UCIDA hates even more than MSY management. If not at that meeting then the next one….

The Alaska BOF should get off its butt and finally just get real, acknowledge it has made a giant fisheries management error allowing user groups to manipulate and sit on the BOF. The BOF should recommend to the Alaska Legislature that new rules be drafted for BOF members. BOF members should NOT be connected to the fisheries they are managing. Conflict of interest has been greatly underestimated when dealing with fisheries management. Use BOF members who are smart, educated and successful, not politicians, attorneys or persons profiting from fish sales. The Alaska BOF needs to be reorganized, period.

Donald Johnson

Soldotna Alaska

[redacted]

Proposal 1: Oppose Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose
Proposal 43: Oppose Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose
Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose
Proposal 82: Oppose Proposal83: Oppose Proposal 84: Oppose Proposal 85: Oppose
Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose
Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose
Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose
Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose
Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose
Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose

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Proposal 252: Oppose
Proposal 253: Oppose
Proposal 254: Oppose
Proposal 255: Oppose

Submitted by: Brian Jones
Community of Residence: Anchorage,AK

Proposal #165 - I am opposed to allowing the use of two artificial flies. This opens up the potential for abuses and "skirting" of the law as officers already have enough regulations to enforce. Adding the ability for anglers to use more than one fly will add to the work load of officers in the field who will be tasked with scrutinizing equipment and intentions for use of such equipment [2 artificial flies]. The use of any more than one fly is highly unnecessary on the Kenai River as our fish are opportunistic and anglers generally have no issue catching fish on a single fly.

Proposal #166 - I am opposed to limiting the use of various fishing techniques to target resident species such as rainbow trout and Dolly Varden. This proposed regulation to make this water "artificial fly only" would make the use of plastic "beads" illegal and encourage anglers to use artificial salmon egg imitation flies that have proven to cause unnecessary mortality of resident trout and Dolly Varden that swallow such flies.

Singling out methods and means of targeting native trout species is discriminatory in nature, especially when language such as "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the Resident Species in active spawning areas with methods that disrupt spawning behavior" is used to describe another angler's choice of fishing methods.

I find this language to be inflammatory at best as it calls into question the "ethics" of individual angler's techniques; a judgment that can only be made by an individual angler who is fishing within the guidelines of the law.

I would argue to the person who proposed this examine their choice of methodology of targeting resident rainbow trout by using a motorized vessel to repeatedly motor upstream and drift downstream to target these resident species until you find "the bite" a.k.a. an area where several fish are "biting," even with the use of "artificial flies" can also be considered to be "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the resident species in active spawning areas with methods that disrupt spawning behavior." This method of "power trout fishing" is equally as detrimental to the resident trout population.

Once an angler using a motorized vessel finds this area where fish are "biting" they will target this area repeatedly until the fish stop biting. I do not see a distinction between the aforementioned techniques as they are both used to target resident fish in vulnerable stages of their life cycle just after or during an active spawning season.

Proposal #167 - I am opposed to this proposal as it seeks to discriminate against anglers who are deemed to be unethical by other anglers simply by their choice of angling methods that fall within well within the letter of the law.

The use of bait under bobbers has a very significant goal: to specifically target coho salmon in the water where they are most commonly holding, which often is not the same water that resident rainbow trout are frequently found. The use of bobbers an eggs is actually meant to reduce the number of incidentally caught non-target species; further, the use of 2 hooks actually limits the number of rainbow trout that are hooked in sensitive areas such as deep in the throat or in the gills. Those that fish bobbers and eggs know this well, while those who do not understand the technique are not familiar with this method of limiting mortality rates.

If this proposal purports that angers using bobbers and eggs are responsible for mortally wounding or killing resident species, I would like to point out the fact that those opposed to the use of bobber and eggs are actually targeting rainbow trout specifically and use methods more detrimental to these trout.

They agree that there is an "acceptable" mortality rate for catch and release fishing for rainbow trout. For sake of argument, let's say that the mortality rate is 3% for properly handled rainbow trout regardless of methods or

means, if an angler incidentally catches 10 rainbow trout while using bobber and eggs unintentionally, they ostensibly may "kill" .3 (that's far less than 1) fish per 10 caught. If another angler, such as the individual proposing this regulation change is actively targeting rainbow trout where the use of "power trouting" or repeatedly fishing a small area over and over because the "bite is hot," they can catch up to 100 rainbow trout and Dolly Varden per day. In this case, with the aforementioned 3% mortality rate, they would kill up to 3 rainbow trout per day. My argument is, who is having a more detrimental effect on the resident rainbow trout given the parameters? I think any reasonable and prudent person would understand that those choosing to use "bobber and eggs" are actually having a very small impact vs. anglers who are specifically targeting and catching up to 100 trout per day

Proposal #168 - I am opposed to allowing the use of two artificial flies. This opens up the potential for abuses and "skirting" of the law as officers already have enough regulations to enforce. Adding the ability for anglers to use more than one fly will add to the work load of officers in the field who will be tasked with scrutinizing equipment and intentions for use of such equipment [2 artificial flies]. The use of any more than one fly is highly unnecessary on the Kenai River as our fish are opportunistic and anglers generally have no issue catching fish on a single fly.

Proposal #169 - I am strongly opposed to any regulation that allows for "hook and hand off" practices for harvesting salmon species. This rule change is disguised as a way to help children, older folks and disabled folks fish, when it actually puts these user groups in a category of "incapable" of hooking their own limit of fish, which is so far from the truth. I would argue that, as a fishing guide, it is my job to exhaust all teaching techniques at my disposal to see that young anglers, elderly anglers and disabled anglers are aided in legally hooking their own fish. I have rarely run across a person that I can not help in this cause. This proposal is a smoke in mirrors attempt for guides to catch and pass fish so that they can quickly catch a limit and get off of the river so they can go pick up their next group of clients. This practice not only makes it difficult for law enforcement to enforce daily limits, it also robs anglers the chance to enjoy the success that comes with learning a technique, hooking their own fish and bringing them to hand. This is lazy guiding and lazy angling and it is not supported by ethical fishing methods and manners of taking as sports men and women.

Proposal #172 - I am opposed to this proposal as the intention is to allow anglers who have caught their limits of coho salmon to continue fishing in order to hook and pass off a fish to another angler. This takes the opportunity away from an individual to hook and catch their own fish. This practice takes away from the experience of an angler who is passed another angler's rod. They know that they, themselves did not hook that fish and part of the joy of fishing is to hook and catch your own fish. This limits young anglers, senior anglers and handicap anglers opportunity to experience the success of hooking and catching their own fish. Yes they may get a "limit" for the boat, but taking part in that success of ethically catching your own fish is more rewarding than having a limit for the boat.

Proposal #179 - I am someone who partakes in the "winter fishery," I can tell you that there is no active, intentional targeting of spawning coho salmon by the vast majority of anglers. Yes, some anglers illegally target these fish; however, they are quickly brought to justice. The use of social media is a great tool to actually catch and prosecute anglers violating the targeting of and removal of coho salmon from the water when the season is closed. There is also immense social pressure among fellow anglers to correct these behaviors, warn other anglers about targeting coho out of season. This has led to a decrease in the practice over the years. As someone who spends several days fishing this stretch of water. The false sense that this practice is increasing is the perception that social media brings as more anglers are aware of this happening; whereas, when social media was not as prevalent, many folks were unaware of the occasional violations. With increased awareness by social media, it actually has helped to immediately cease such behaviors instead of it happening "under our noses" prior to the popularity of social media.

Proposal 163: Oppose	Proposal 164: Oppose	Proposal 165: Oppose	Proposal 166: Oppose
Proposal 168: Oppose	Proposal 169: Oppose	Proposal 172: Oppose	

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Proposal #180 - Similar to proposal 179, I am opposed to this proposal #180 as there simply is no evidence that there is an "uptick" in angling pressure and folks actually targeting spawning coho salmon. It simply does not happen but on an anecdotal level. This is seeking to punish the majority for the acts of a few. These acts of a few have actually been swiftly punished, proving the effectiveness of social media, news media and social pressure by the angling community to curtail such practices.

Proposal #181 - I am opposed to this proposal as it is addressing an "issue" that is actually not an issue at all. I guide and personally fish the portion of this river in question the Middle River Kenai. I would argue that there is actually less angling pressure than there has been historically. This is a section of river that is difficult to access when Skilak Lake is Frozen, Dots Landing is frozen, the river is low and Bing's Landing is iced over (the majority of the time frame in question). Many hearty anglers choose to hike in up to 45 minutes to this spot to recreational fish for the day. There is no easy access for much of the winter to this section of river. The "appearance" of an increase in usage is anecdotal as this is amplified by social media posts making it seem like there are more people out there than there actually are. It is very possible that 100 anglers use this area per month on average. Prior to the popularity of social media, maybe 5 of these 100 posted pictures of their adventures fishing this section of river. Since the increase in popularity of fishing on social media, of these 100 anglers, if 20-30 post on social media, this would give the false impression that there is an increase of angling pressure, when in fact it is the same amount of pressure (the same historical 100 anglers) This "pressure" seems to be increasing, but it is only increasing in visibility, not in numbers and usage. Awareness of fishing pressure is not the same as an increase in fishing pressure.

Proposal #185 - I agree that the regulations need to be changed to not allow the use of bait on this section of river from January 1st to June 30th annually.

Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose
Proposal 183: Oppose

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the commercial and subsistence fisheries in Valdez, Alaska, and I support removing Proposal 59 and oppose Proposal 43.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

Sincerely,
Kurt Jones
[redacted]
Valdez, Alaska

Proposal #165 - I am opposed to allowing the use of two artificial flies. This opens up the potential for abuses and "skirting" of the law as officers already have enough regulations to enforce. Adding the ability for anglers to use more than one fly will add to the work load of officers in the field who will be tasked with scrutinizing equipment and intentions for use of such equipment [2 artificial flies]. The use of any more than one fly is highly unnecessary on the Kenai River as our fish are opportunistic and anglers generally have no issue catching fish on a single fly.

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Singling out methods and means of targeting native trout species is discriminatory in nature, especially when language such as "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the Resident Species in active spawning areas with methods that disrupt spawning behavior" is used to describe another angler's choice of fishing methods.
I find this language to be inflammatory at best as it calls into question the "ethics" of individual angler's techniques; a judgment that can only be made by an individual angler who is fishing within the guidelines of the law.
I would argue to the person who proposed this examine their choice of methodology of targeting resident rainbow trout by using a motorized vessel to repeatedly motor upstream and drift downstream to target these resident species until you find "the bite" a.k.a. an area where several fish are "biting," even with the use of "artificial flies" can also be considered to be "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the resident species in active spawning areas with methods that disrupt spawning behavior." This method of "power trout fishing" is equally as detrimental to the resident trout population.
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Proposal #172 - I am opposed to this proposal as the intention is to allow anglers who have caught their limits of coho salmon to continue fishing in order to hook and pass off a fish to another angler. This takes the opportunity away from an individual to hook and catch their own fish. This practice takes away from the experience of an angler who is passed another angler's rod. They know that they, themselves did not hook that fish and part of the joy of fishing is to

hook and catch your own fish. This limits young anglers, senior anglers and handicap anglers opportunity to experience the success of hooking and catching their own fish. Yes they may get a "limit" for the boat, but taking part in that success of ethically catching your own fish is more rewarding than having a limit for the boat.

Proposal #179 - As a resident of Cooper Landing, a fishing guide of 10 years, an outfitter and someone who partakes in the "winter fishery," I can tell you that there is no active, intentional targeting of spawning coho salmon by the vast majority of anglers. Yes, some anglers illegally target these fish; however, they are quickly brought to justice. The use of social media is a great tool to actually catch and prosecute anglers violating the targeting of and removal of coho salmon from the water when the season is closed. There is also immense social pressure amongst fellow anglers to correct these behaviors, warn other anglers about targeting coho out of season. This has led to a decrease in the practice over the years. I say this as someone who not only guides during this window, but spends several days fishing this stretch of water. The false sense that this practice is increasing is the perception that social media brings as more anglers are aware of this happening; whereas, when social media was not as prevalent, many folks were unaware of the occasional violations. With increased awareness by social media, it actually has helped to immediately cease such behaviors instead of it happening "under our noses" prior to the popularity of social media.

Proposal #180 - Similar to proposal 179, I am opposed to this proposal #180 as there simply is no evidence that there is an "uptick" in angling pressure and folks actually targeting spawning coho salmon. It simply does not happen but on an anecdotal level. This is seeking to punish the majority for the acts of a few. These acts of a few have actually been swiftly punished, proving the effectiveness of social media, news media and social pressure by the angling community to curtail such practices.

Proposal #181 - I am opposed to this proposal as it is addressing an "issue" that is actually not an issue at all. I am a resident of Cooper Landing and often fish the portion of this river in question on the Middle River. I would argue that there is actually less angling pressure than there has been historically. This is a section of river that is difficult to access when Skilak Lake is Frozen, Dots Landing is frozen, the river is low and Bing's Landing is iced over (the majority of the time frame in question). Many hearty anglers choose to hike in up to 45 minutes to this spot to recreationally fish for the day. There is no easy access for much of the winter to this section of river. The "appearance" of an increase in usage is anecdotal as this is amplified by social media posts making it seem like there are more people out there than there actually are. It is very possible that 100 anglers use this area per month on average. Prior to the popularity of social media, maybe 5 of these 100 posted pictures of their adventures fishing this section of river. Since the increase in popularity of fishing on social media, of these 100 anglers, if 20-30 post on social media, this would give the false impression that there is an increase of angling pressure, when in fact it is the same amount of pressure (the same historical 100 anglers) This "pressure" seems to be increasing, but it is only increasing in visibility, not in numbers and usage. Awareness of fishing pressure is not the same as an increase in fishing pressure.

Proposal #185 - I agree that the regulations need to be changed to not allow the use of bait on this section of river from January 1st to June 30th annually.

Brett Just

Submitted by: Ryan Kelly
Community of Residence: Wrangell ak

Comments on proposal 257

I support the portion of proposal 257 that amends the language to align with changes made by the salmon treaty to the calculation of the all gear harvest limit.

I do not support the language in 5 AAC 47.055 b(2) allowing sport harvest to continue without a ceiling. This issue is addressed by Proposal 259.

I can support proposal 257 with the following change, Add Sport fishery to 5 AAC 47.055 b(2) to read

(2) allow uninterrupted sport fishing in salt waters for king salmon, while not exceeding the sport fishery harvest ceiling;

Comments on Proposal 258

I support proposal 258 and do not suggest any language changes.

Proposal 258 updates the King Salmon Management Plan to reflect the change from 7 to 17 tier system under the new All Gear Harvest limit under the Pacific Salmon Treaty. This is a necessary step to fully comply with the Changes made to the Pacific Salmon Treaty.

Comments on Proposal 259

Thank you for taking up ACR 13 and considering proposal 259 at the Lower Cook Inlet meeting. I support this proposal.

This proposal changes. 5 AAC 47.055 (b) (2) back to the language the Board of Fish adopted in RC 178 at the March 2022 Board Of Fish Meeting. This language is found in 5 AAC 47.055 b(2).

(2) allow uninterrupted sport fishing in salt waters for king salmon, while not exceeding the sport fishery harvest ceiling;

Alaska Trollers Association (ATA) and Territorial sportsmen are on record saying they would not have signed RC 178 without this language in it. Every gear group and sector needs limits on their effort. Trollers are mostly all Alaska Residents so non-resident sport directly affects people living in rural southeast Alaska. These communities need king salmon to sustain them through the year.

There is room for compromise and we found it with RC178 and we are trying it for 3 years. The Department did all of us a disservice choosing to liberalize one sector (non-resident sport) at the expense of all commercial gear groups.

King Salmon are a finite resource that many, many groups depend on. It’s important to conserve this precious resource and non-resident sport is the only one not participating in that conservation. [How is conservation important to you?}

Please describe how the loss of the second king opener affected you?

The Department made a drastic change to the agreement found in RC 178. Please, correct this by taking up adding the suggested language back in Proposal 259.

COMMENTS PREPARED FOR THE

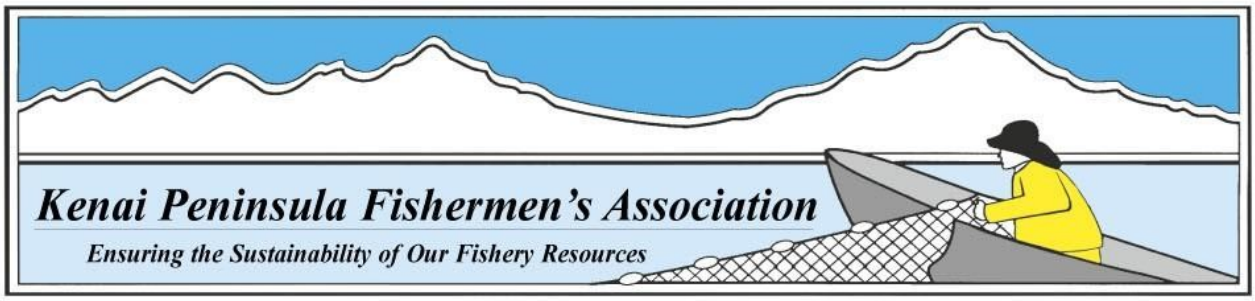
2024 UPPER COOK INLET ALASKA BOARD OF FISHERIES

Kenai Peninsula Fishermen's Association

43961 Kalifornsky Beach Road, Suite F

Soldotna, AK 99611

February 23-March 7, 2024



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(907) 262-2492 • Fax: (907) 262-2898 • E Mail: kpfa@alaska.net

The **Kenai Peninsula Fishermen's Association** (KPFA) has been a commercial fishing advocacy group since 1954. We are a non-profit 501(c) (6). We are primarily comprised of setnet salmon limited entry permit holders and in addition, we include other Cook Inlet gear types, crewmembers, fish processors, local businesses and other general interest in our membership.

We primarily represent salmon set net permit holders all along Cook Inlet shores. We are comprised of approximately 400 set net fishing families holding 736 Cook Inlet setnet permits. Of those, 86% of the permit holders are residents of the State of Alaska and participate in the historic fishery that has existed in Upper Cook Inlet for over **146 years.**

KPFA's mission is **"*Ensuring the Sustainability of Our Fishery Resources.*"** Our goal is to continue to strengthen our fishing community and to promote the economic stability of our fishery within our local communities and the State of Alaska.

The Kenai Peninsula Fishermen's Association is insistent that the principles of high sustained yield with strong guidelines to maintain environmental standards, should be the first rule in Cook Inlet fisheries management. Departments should actively seek guidance from stakeholders on how best to manage the fishery resources in respect to their traditional ways and harvest. They should engage the users to be realistic in their approach to maintain the goals but be science-based in those decisions and acknowledge their historical importance. The public should support reasonable achievable expectations within a fully allocated resource while considering the impacts on a fisheries targeted stock based on non-target stock management.

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INTRODUCTION

Included in this document are the comments from the Kenai Peninsula Fishermen's Association Board of Directors regarding the 186 proposals that the Board of Fisheries will address at it's Upper Cook Inlet Board meeting on February 23, to March 7, 2024 in Anchorage.

In our review of the proposals, we took a "Support", "Oppose" or "No Action" stance for each one. In light of the fact that the **Stock of Concern Plan** was released after the proposal deadline, we will be submitting comments and working with the Board through the Committee of the Whole process to help craft that very important plan that will shape our fishery's future until the Kenai River Large King Salmon is delisted as a Stock of Concern.

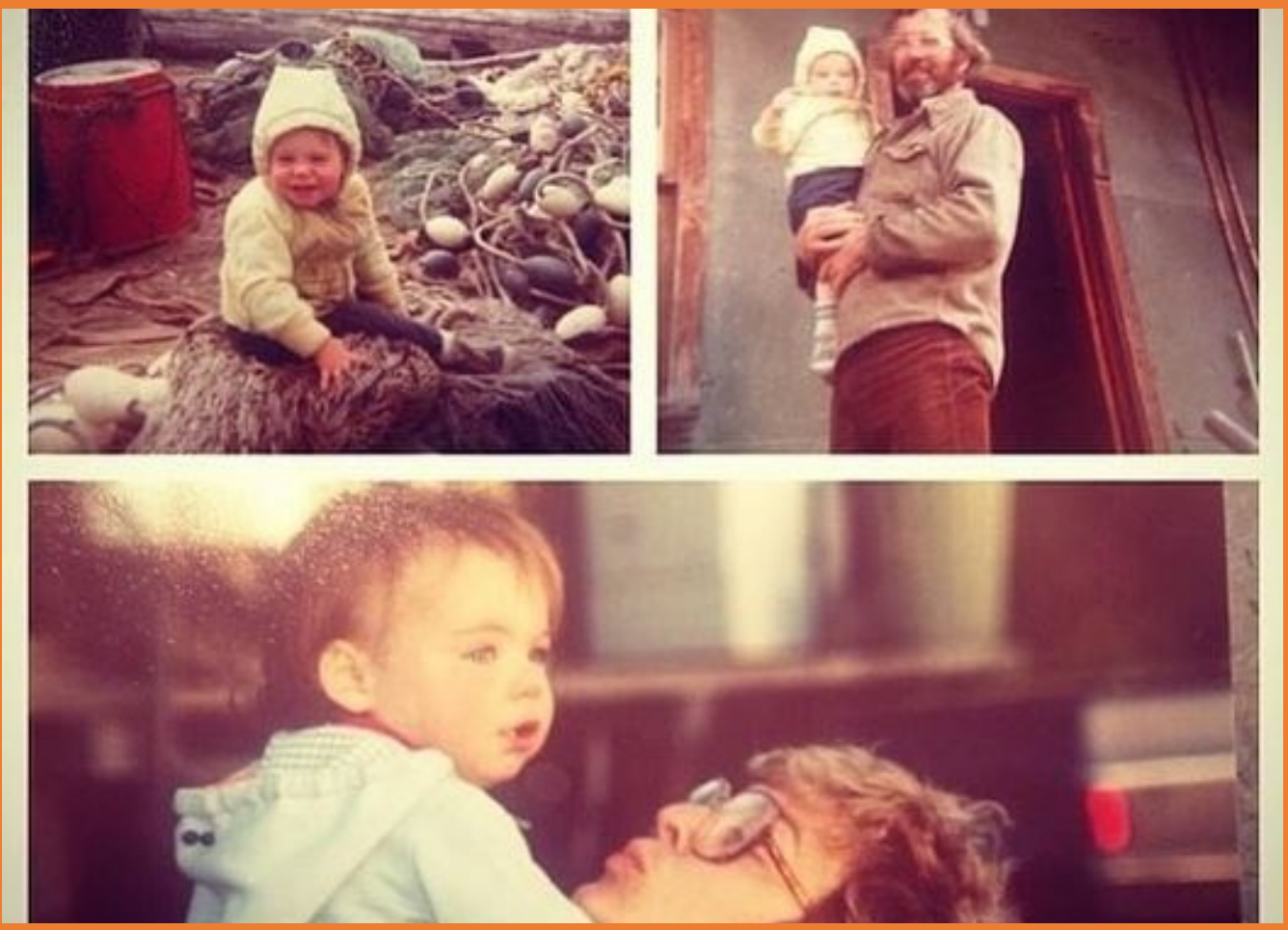
Our submitted comments here are a general stance on the individual proposals as they were presented in the proposal book and they will be discussed further in depth at the board meeting through public comment and the committee of the whole process.

Our recommendations in this document are based on our discussions as a group and how they relate to the future of our fishery. In many cases of "No Action" we did not feel that we had the expertise on the proposal scope and therefore chose to not weigh in on those individual proposals.

We will provide data as we move through the board process and engage with Board members and other stakeholders to find the best plan that provides meaningful and equitable opportunity within all user groups.

We do not support fisheries regulations that exclude any fishery and believe that historic fisheries and the stock that they target is critical for the survival of that fishery. Bullying and marginalizing fisheries or those who participate in those fisheries is an unacceptable way to move forward in this conversation. We support scientific and biological based goals that have been vetted by the Alaska Department of Fish and Game through the vetting process to determine the future health of the stock. We look to sit at the table with all user groups respectfully and with a mutual goal to move forward for the health of our rivers, lands and future stocks of salmon in Upper Cook Inlet.

We respectfully ask the Chair to consider that all Board members be allowed to participate in all meetings, deliberations and vote at this Board meeting. All Board members were appointed by the Governor of the State of Alaska, confirmed by the Alaska Legislature, and we feel strongly that they should be included in this important process . We ask that each participates with the valuable insight and knowledge for which they were chosen to represent in the public regulatory process of the Alaska Board of Fisheries.



KPFA PROPOSAL COMMENTS

Alaska Statutes 16.05.251. Regulations of the Board of Fisheries.
(e): Allocation Criteria

1. The history of each personal use, sport, guided sport, and commercial fishery: ***The future of the historic Eastside Setnet Fishery should not be determined by only looking forward. Looking back at the deep history of this 146 year old fishery is relevant and the board shall use the criteria as appropriate to particular allocation decisions.***

Alaska Statutes 16.05.251. Regulations of the Board of Fisheries. (e): Allocation Criteria

The Board of Fisheries may allocate fishery resources among personal use, sport, guided sport, and commercial fisheries. The board shall adopt criteria for the allocation of fishery resources and shall use the criteria as appropriate to particular allocation decisions. The criteria may include factors such as:

1. **The history of each personal use, sport, guided sport, and commercial fishery:** ***The future of the historic Eastside Setnet Fishery should not be determined by only looking forward. Looking back at the deep history of this 146 year old fishery is relevant and the board shall use the criteria as appropriate to particular allocation decisions.***
2. **The number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future:** ***86% of the Eastside Setnet permit holders are Alaska Residents and 83% of those are residents of the Kenai Peninsula.***
3. **The importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption:** ***The Eastside Setnet fishery has many direct market fishermen to who sell directly to residents fresh from the boats at their beach sites. These are Alaskan families who choose not to get their salmon protein for their freezer or table from a dipnet or fishing pole . These residents can purchase salmon safely and on their timeline as an option directly from the licensed fishermen. In recent years, these Alaskan families have been displaced.***
4. **The availability of alternative fisheries resources:** ***The survival of the Eastside Setnet Fishery depends on Sockeye harvest to remain as a viable sector of this Upper Cook Inlet fisheries. Without opportunity to harvest those sockeye, they will not survive. They have NO other option.***
5. **The importance of each fishery to the economy of the state:** ***Commercial fisheries in the State of Alaska have been around since the 1800's. All fisheries, regardless of harvesting power are taxed by the State of Alaska for the fish that are landed and processed within their fishery, therefore contributing to the state economy. Healthy coastal communities are important to the economy of the state. Though recent allocative regulations and management practices, the importance of this fishery has been substantially reduced based on a non-target stock.***
6. **The importance of each fishery to the economy of the region and local area in which the fishery is located:** ***The Eastside Setnet fishery was and still is important to the local municipalities of the Kenai Peninsula and individual small coastal towns along the shores of Upper Cook Inlet. Through recent allocative regulations and management practices, the importance of this fishery has been substantially reduced based on a non-target stock..***
7. **The importance of each fishery in providing recreational opportunities for residents and nonresidents:** ***The Eastside Setnet fishery does not directly provide recreational opportunities to resident and nonresidents, but through the regulatory process have been allocated out of the sockeye fishery from which they survive and now remain as a non-viable fishery through total closures. We have given 100%.***

Proposal 77, 78, 80—SUPPORT

PROPOSAL 77, 78, 80 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify the Kenai River Late-Run King Salmon OEG.**

PROPOSED BY: **Kenai Peninsula Fishermen's Association.**

We support many parts of Proposals 77, 78 and 80. We understand that the Kenai River Late-Run King Salmon Management Plan directs the department to manage Kenai River late-run king salmon to achieve an optimal escapement goal (OEG) of 15,000 – 30,000 king salmon 75 cm mid eye to tail fork and longer (large fish). We support providing the Eastside Setnet Fishery with meaningful opportunity to harvest sockeye, their targeted species.

For the sake of discussion and data, we believe that there is potential opportunity for the Eastside Setnet Fishery to harvest at the lower end of the SEG of 13,500 - 27,000 with minimal negative impact to future productivity of the late-run king salmon stock. The department reviewed the late-run king salmon SEG in the 2023 escapement goal review process and did not change this goal. It was noted by the Department in their comments to the Board of Fisheries, RC 2, that managing for the SEG would require the board to repeal the OEG. If this is the case, we request that the Board **repeal** the OEG and support the Department's recommended SEG 13,500 - 27,000 **and investigate time, area and gear restrictions that allow some harvest of sockeye for non-target king fisheries within the SEG.**

The total elimination for opportunity in a mixed stock fishery, while ALL other users impact or interact with king salmon is an unacceptable practice that in recent years has severely limited and in 2023 completely eliminated all harvest of all stocks exclusively in the Eastside Setnet Fishery.

We are asking the board to request data regarding the impact of ALL other users who interact with king salmon. The Eastside setnet fishery is held to the Gold standard with assessed fishery impact, while the impact within other fisheries is unknown. Those fisheries include, but are not limited to the Kenai and Kasilof Inriver Sport Fishery for kings, sockeye, trout and coho; Kenai and Kasilof Guided, king, sockeye, trout and coho fisheries; Kenai Peninsula salt water guided and unguided sport fisheries; Kodiak Seine and Setnet fisheries; Kodiak Guided and Unguided Sport Fisheries; UCI drift fishery; Kenai Peninsula Educational Fisheries; Personal Use Dipnet and Setnet Fisheries and all other fisheries who have bycatch quotas such as the Gulf Of Alaska Trawl fisheries in Federal and State waters. Most of these fisheries have the **potential** to negatively impact Kenai River Late Run King salmon under the SEG **before** one fish is counted at the Kenai River sonar at approximate river mile 14.

We are asking for some allowable harvest on a non-target stock in the Kenai and Kasilof mixed stock fisheries and ask that the Board allow for some harvest opportunity of the plentiful targeted sockeye salmon that are available in each river. The viability of a user group, the Eastside Setnet Fishery, is a consideration we ask the board to make when deciding allocation of those stocks as well as the history of our fishery. A 100% closure in

only one fishery, with no option for any other financial opportunity is not an option. It is crafted by some as paired in the KRLRKSMP, but it is not fair or equitable.

We understand that we may be in a stock of concern status for some time, possibly multiple board cycles , and the regulations in the Kenai River Late Run King Salmon Management Plan KRLRKSMP may not take effect for several years. But, if we do find ourselves out of the Stock of Concern plan anytime soon, we would like the opportunity to harvest a stock that is recovering, but not be managed under the current OEG of 15,000-30,000 for Kenai River Late Run Kings.

This OEG will leave us in the situation that we currently find ourselves, with no fishing opportunity. In the Department's RC 2, they note that the higher OEG directs them to take a more conservative stance when managing the fisheries that harvest late-run king salmon and increase the probability of achieving escapements that are greater than the lower end of the SEG. And that **the department does not evaluate OEGs as they are set by the board and can incorporate non-biological factors.** We realize that the OEG is the management goal, but the SEG is the scientific yield-based goal that will provide for future harvest of the stock. We look forward to productive, respectful conversations with all stakeholders in the Committee of the Whole process for the Kenai River Late Run King Stock of Concern Plan.

We ask the Board for reconsideration of the Optimal Escapement Goal (OEG) of 15,000-30,000 that Proposals 77, 78 and 80 seek to address. We support managing the Eastside Setnet Fishery to the (SEG) of 13,500—27,000 large king salmon which is the biological goal recommended by ADFG and provides for future yield.

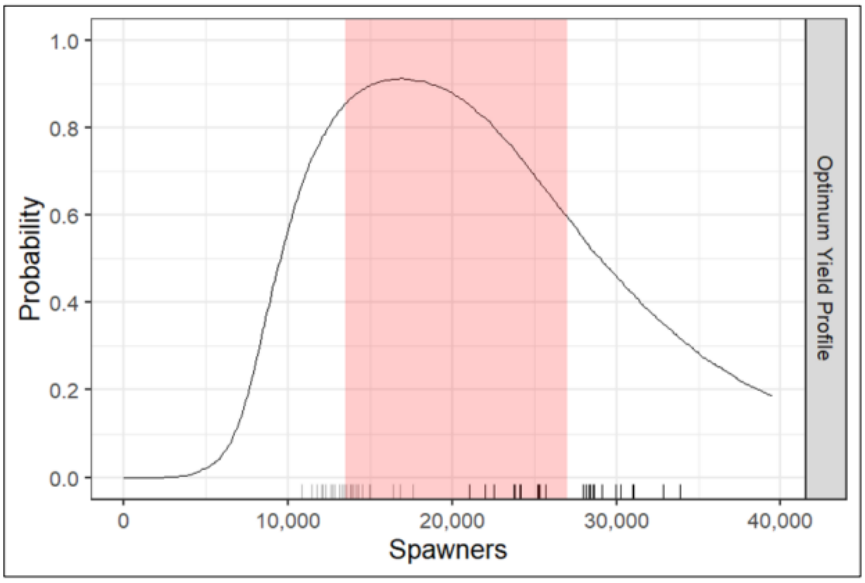


Figure 75-1.– Optimal yield profiles (OYP) plots for Kenai River late-run Chinook salmon 75 cm METF and longer. OYPs show probability that a specified spawning abundance will result in 80% of maximum sustained yield. The goal range shown is the SEG.

Note: Shaded areas bracket the current goal range; grey and black marks along the *x*-axis show comparable lower and upper bounds, respectively, scaled by S_{MSY} ratios for other Alaskan Chinook salmon stocks.

Proposal 90—OPPOSE

PROPOSAL 90 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. and 5 AAC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan. Expand weekly time-period "windows" where the commercial salmon fishery is closed.**

PROPOSED BY: **Kenai River Sport Fishing Association**

We oppose Proposal 90. This proposal is strictly allocative and aims to limit commercial fishing opportunities in the Eastside Setnet fishery with punitive extended mandatory closures. It adds an additional 24 hours to the current 36-hour window that is in regulation. Therefore creating a 48-hour window in the lower tier of sockeye runs to the Kenai River.

The recent practice of establishing 48-hour windows is outside of the current management plans and has only resulted in closures of the Eastside Setnet fishery when fish were abundant on the beaches. The proposer's theory is flawed. They would have you believe that fish travel during specific window periods in specific density. Regardless of the run size, when sockeye commit to the river, they move in large pulses. The largest counts of fish **COULD** hit the river during a 48-hour window closure. The personal use and the in-river sport fishery cannot efficiently harvest large numbers of sockeye as described in the department comments below. Density dependent fisheries such as the Kenai and Kasilof personal use and sport fisheries are not currently harvesting the numbers of fish passing through those fisheries with enough harvesting strength to achieve the current management objectives.

In RC 2, Vol 1 page 161-162, the Alaska Department of Fish and Game states that "this may reduce the ESSN fishery sockeye salmon harvest and increase the number of sockeye salmon entering the Kenai River. Adding hours to the current closed fishing windows would reduce the department's ability to manage sockeye salmon escapements and increase the likelihood that the Kenai River late-run and Kasilof River sockeye salmon goals would be exceeded. The current 36-hour window prohibits commercial fishing in the ESSN fishery on Fridays and by extending to 48 hours this would prohibit commercial opportunity on Saturdays. Recent practice has extended the window from fishery closure on Thursday through Sunday so it is not clear if closing Saturday by regulation would increase the amount of salmon moving inriver." We absolutely know that it will increase the amount of salmon moving inriver without harvest in the ESSN fishery if they were allowed to harvest abundant sockeye during a window. We also know that it is the goal of some to eliminate any harvest of sockeye in the ESSN fishery regardless of what day it is.

The department recognized in RC 2, that "the decreased commercial harvest and saturation of inriver fisheries contributes to the Kenai River exceeding escapement goals **30% of years since 1999**, with **4 of the last 5 years exceeding the SEG.** The Kasilof River has been exceeding escapement goals 80% of years since 1999 and has exceeded the

SEG/BEG each year since 2018 (Table 81-4). This is occurring even as the average Kenai River sockeye salmon total run decreased by 15% from an average of 3.9 million fish (2003–2012) to 3.3 million (2013– 2022) (Table 81-3). In recent years, low abundance of Kenai River king salmon resulted in less commercial fishing time for the **ESSN fishery, which reduces sockeye salmon harvest.** In 2023, the ESSN fishery did not open due to paired restrictions linked to low Kenai River late-run king salmon abundance. **The potential impacts of consistently exceeding sockeye salmon escapement goals since 2019 will be seen when fish spawned from these years return over the next 2-6 years**."

While the sockeye salmon SEGs have been exceeded, **and resulted in lost yield in these years**, it is unknown if it will result in a long-term loss of yield. In converse, the results of not attaining the lower end of a weaker stock, in this case Kenai River late-run king salmon are known.

We strongly oppose Proposal 90 which adds more window closure hours when the current fish escaping into all in-river users is resulting in foregone harvest and the danger of an unknown long-term loss of yield for sockeye salmon.

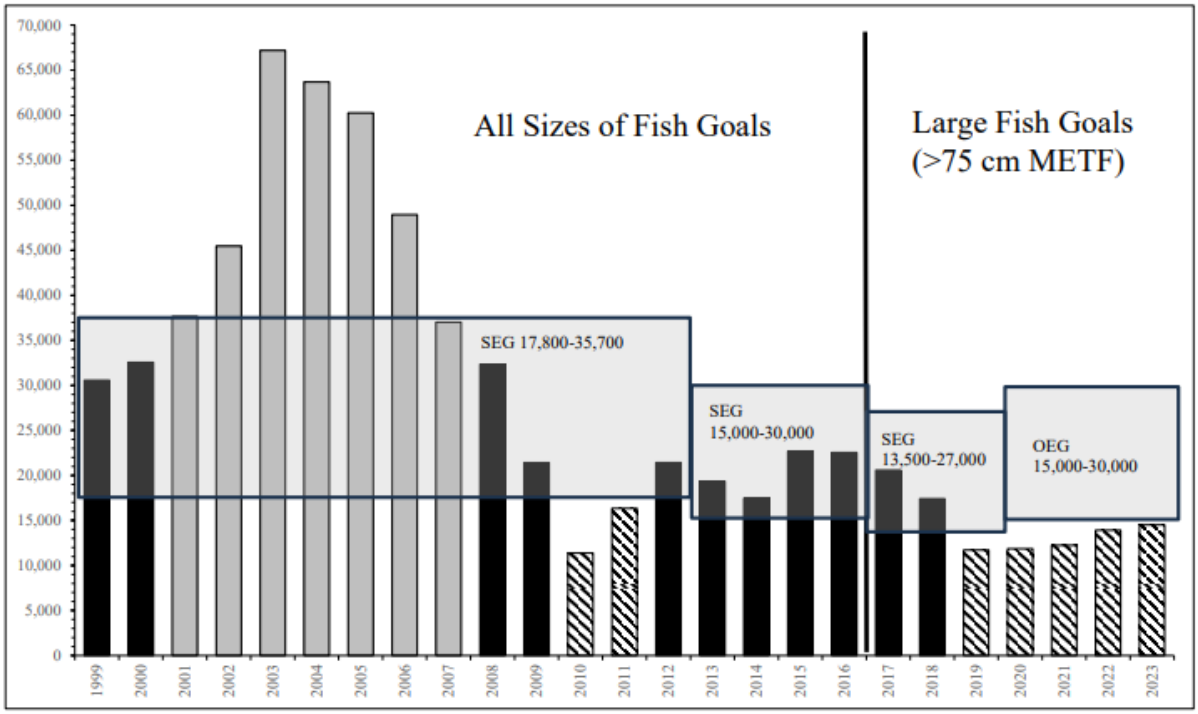


Figure 81-3.–Escapement of Kenai River late-run king salmon, 1999–2023.

Note: METF = mid eye to tail fork length

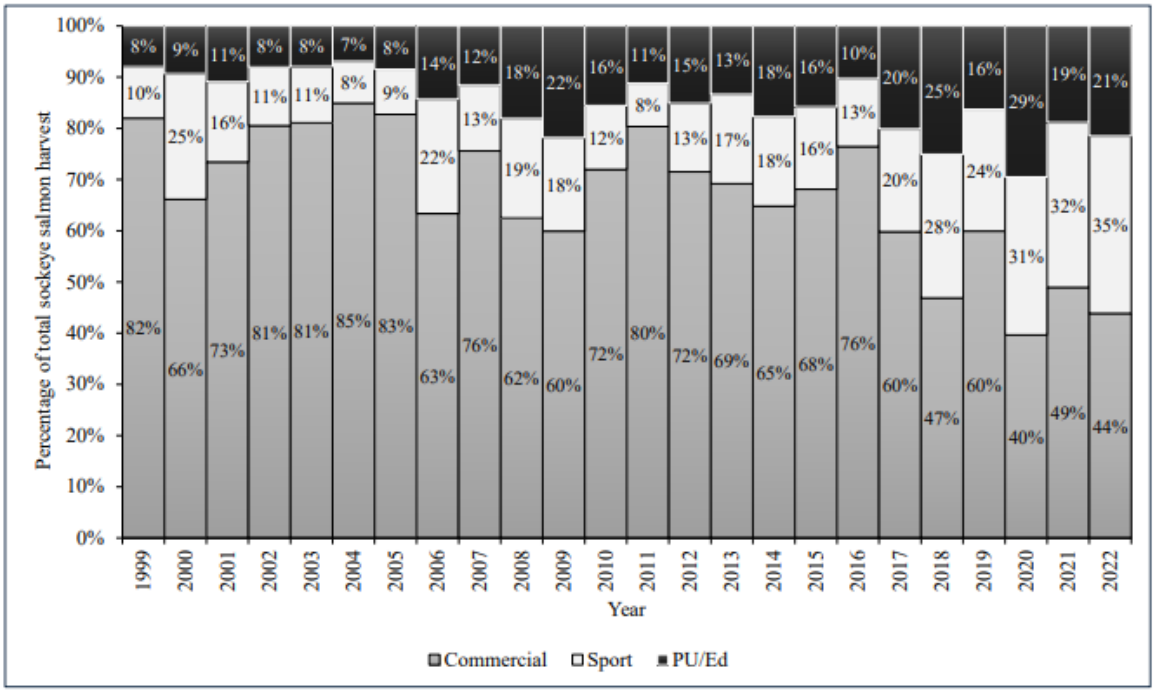


Figure 81-4.–Percentage of total Kenai River late-run sockeye salmon harvest in commercial, sport, personal use fisheries, 1999–2022.

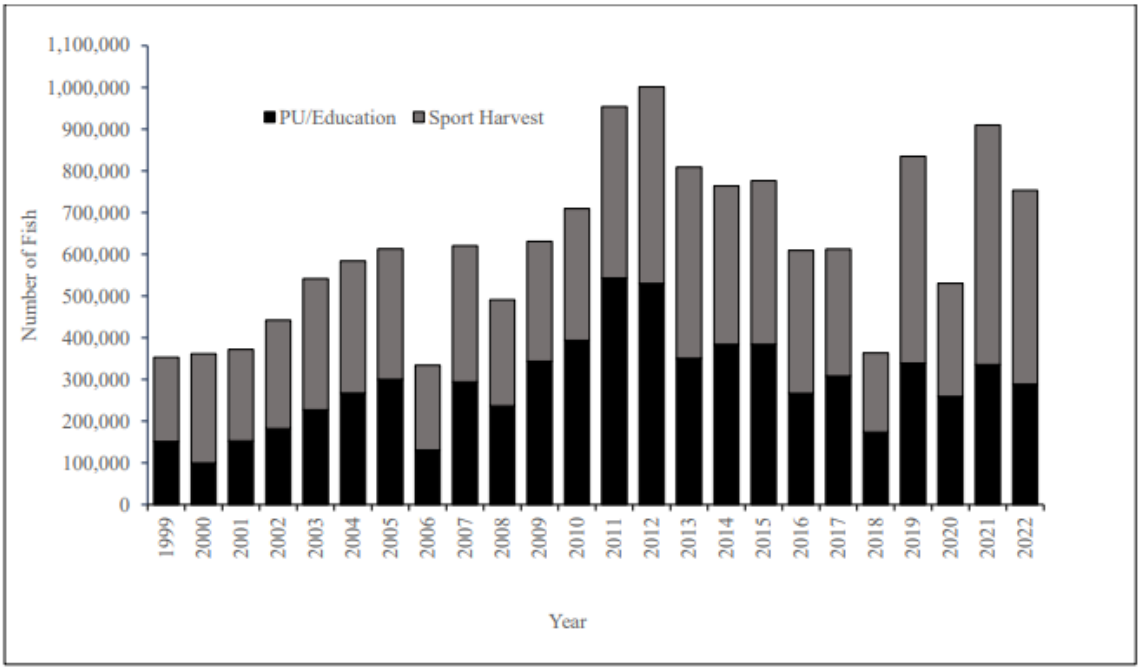


Figure 81-5.–Personal Use (PU)/Education, sport and total inriver harvest of Kenai River late-run sockeye salmon.

Table 112-4.–Estimates of the harvest of Kenai River sockeye salmon in commercial, sport, and personal use fisheries, 1999–2022.

	Harvest				% of Total Harvest		
Year	Commercial	Sport	PU/Ed	Total	Commercial	Sport	PU/Ed
1999	1,551,907	189,885	150,993	1,892,785	82%	10%	8%
2000	705,699	261,779	99,571	1,067,049	66%	25%	9%
2001	1,028,205	219,478	152,580	1,400,263	73%	16%	11%
2002	1,827,466	259,759	182,229	2,269,454	81%	11%	8%
2003	2,321,047	314,456	227,207	2,862,710	81%	11%	8%
2004	3,289,237	317,233	266,937	3,873,407	85%	8%	7%
2005	2,936,487	312,835	300,105	3,549,427	83%	9%	8%
2006	577,512	203,602	130,486	911,600	63%	22%	14%
2007	1,921,009	326,341	293,941	2,541,291	76%	13%	12%
2008	817,164	254,579	236,355	1,308,098	62%	19%	18%
2009	943,784	287,867	343,302	1,574,953	60%	18%	22%
2010	1,821,553	316,275	393,317	2,531,145	72%	12%	16%
2011	3,901,433	410,767	543,043	4,855,243	80%	8%	11%
2012	2,513,544	471,096	530,128	3,514,768	72%	13%	15%
2013	1,816,297	458,522	350,302	2,625,121	69%	17%	13%
2014	1,406,865	380,055	384,018	2,170,938	65%	18%	18%
2015	1,658,415	392,116	384,095	2,434,626	68%	16%	16%
2016	1,973,123	343,169	264,900	2,581,192	76%	13%	10%
2017	906,523	304,667	304,632	1,515,822	60%	20%	20%
2018	317,200	190,122	169,553	676,875	47%	28%	25%
2019	1,248,570	495,723	338,952	2,083,245	60%	24%	16%
2020	348,634	271,290	259,282	879,206	40%	31%	29%
2021	871,824	574,275	335,396	1,781,495	49%	32%	19%
2022	588,802	465,194	288,453	1,342,449	44%	35%	21%
			Averages				
1999-2003	1,486,865	249,071	162,516	1,898,452	78%	13%	9%
2004-2008	1,908,282	282,918	245,565	2,436,765	78%	12%	10%
2009-2013	2,199,322	388,905	432,018	3,020,246	73%	13%	14%
2014-2018	1,252,425	322,026	301,440	1,875,891	67%	17%	16%
2019-2022	764,458	451,621	305,521	1,521,599	50%	30%	20%
All years	1,553,846	334,212	288,741	2,176,798	71%	15%	13%

Note: 1999–2004 commercial harvest estimates generated from age-comp allocation model (Tobias and Willette, 2013); 2005–2022 commercial harvest from genetic stock composition analyses (Barclay, 2019)

Proposal 91—SUPPORT

PROPOSAL 91 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Amend criteria for commercial set gillnet fishing periods, in the Upper Subdistrict, after August 1.**

PROPOSED BY: **Travis Every.**

We support Proposal 91. We agree that if restrictions for the late-run Kenai River king salmon sport fishery are in effect on July 31, then, beginning on August 1, the Upper Subdistrict set gillnet commercial fishing periods are open for no more than 36 hours per week; if the Kenai River late-run king salmon sport fishery is not restricted under the provisions of this section, or, after August 1, if the Kenai River late-run king salmon OEG is **projected** [ACHIEVED] the Upper Subdistrict set gillnet fishery will be managed under the provisions of 5 AAC 21.360, Kenai River Late-Run Sockeye Salmon Management Plan;

So, if the Department of Fish and Game is **projecting** to achieve the management objective (OEG) for Kenai River Late run kings then the Upper Subdistrict set gillnet fishery will be managed under the Kenai River Late-Run Sockeye Salmon Management Plan. Current restrictions placed on the Kenai River king salmon sport fishery for the conservation of the targeted stock, large late run Kenai River Kings, should not in turn have restrictions placed on the set gillnet fishery, which is a sockeye targeted fishery. Having to **achieve** the OEG in August instead of **projecting** the OEG is punitive and unnecessarily restricts opportunity in the Eastside Setnet Fishery.

RC 2 states that "inseason management decisions are based on current run entry that is used to project if the OEG will be met and management actions are implemented if harvest reductions are needed to ensure the OEG is met. From 2017 to 2023, the late-run king salmon SEG was met in 4 of 7 years whereas the OEG has not been met since its establishment in 2020.

Since 1980, the number of sockeye salmon enumerated in the Kenai River in August has steadily increased from 23% in the 1990s to 48% since 2020. In numbers of fish that equates to an average August sockeye salmon passage of 283,000 fish per year in the 1990s, to nearly 472,000 fish per year for the following two decades. **Since 2020, the average has increased to 1.0 million fish returning in August.**

This shift in harvest patterns is attributed to incremental regulatory restrictions to commercial fisheries associated with weak stock management and board allocation actions. **At the same time personal use and sport fisheries under current management structure do not appear to be capable of harvesting the surplus number of fish beyond inriver goals that would be needed to achieve the SEG.**

Combined Kenai River personal use and sport inriver harvest has declined from a high 5-year average (2008-2013) of 757,346 to a low 5-year average (2018-2022) of 678,459 as inriver abundance increased during those same time periods. The decreased commercial harvest and saturation of inriver fisheries contributes to the Kenai River exceeding escapement goals 30% of years since 1999, with 4 of the last 5 years exceeding the SEG. This is occurring even as the average Kenai River sockeye salmon total run decreased by 15% from an av-

erage of 3.9 million fish (2003–2012) to 3.3 million (2013–2022) (Table 81-3)."

We strongly support this proposal which would allow the Eastside Setnet fishery opportunity to harvest targeted plentiful sockeye salmon in August when management objections are projected to be met with high certainty.

Proposal 94—SUPPORT

PROPOSAL 94 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify allowable gear when the set gillnet commercial fishery** is restricted to achieve the Kenai River late-run king salmon optimal escapement goal.

PROPOSED BY: **Joseph Person.**

We support Proposal 94. This proposal would modify the number of set gillnets that may be used in the ESSN commercial salmon fishery, if the Kenai River sport fishery is restricted and allow for additional shorter nets that maintain current aggregate lengths currently allowed.

Current regulations read in the Kenai River Late-run King Salmon Management Plan (KRLRKSMP) 5 AAC 21.359(e)(3)(A–G). Specifically, the management plan states that if commercial fishing is limited under (e)(3), the operation of setnets operated by a CFEC permit holder shall be restricted to:

i) up to four set gillnets that are each not more than 35 fathoms in length, 105 fathoms in aggregate length, and 29 meshes in depth, or two set gillnets that are each not more than 35 fathoms in length and 45 meshes in depth; set gillnets used that are not more than 29 meshes in depth must be identified at the end of the gillnet with an attached blue buoy that is not less than nine and one-half inches in diameter; or

(ii) up to two set gillnets that are each not more than 35 fathoms in length and 29 meshes in depth or one set gillnet that is not more than 35 fathoms in length and 45 meshes in depth; set gillnets used that are not more than 29 meshes in depth must be identified at the end of the gillnet with an attached blue buoy that is not less than nine and one-half inches in diameter.

At the 2014 UCI board meeting, a regulation was adopted that restricted set gillnet gear in the Upper Subdistrict for individuals who own and operate two Cook Inlet CFEC permits; the restriction limited 105 fathoms of the 210 fathoms of gear for dual permit operators to nets no deeper than 29 meshes.

The gear restriction is an option for the permit holder to choose from, either less gear per permit (35 fathoms or 70 fathoms) at standard depth (up to 45 meshes deep) or more gear (either up to 70 fathoms or 105 fathoms in length per permit) that may be no deeper than 29 meshes.

When gear restrictions are in place on the setnet fishery under 21.359(e)(3)(G)(i or ii) in the Kenai River Late Run King Salmon Management plan and the more restrictive gear option is used (All of 2022 and 2021, and most of 2020), no allowance is being made for

the Kenai River Late Run King Salmon Management plan and the more restrictive gear option is used (All of 2022 and 2021, and most of 2020), no allowance is being made for operations that utilize net lengths shorter than 35 fathoms. It reads "up to two set gillnets that are each not more than 35 fathoms in length and 29 meshes in depth..." Compare this to the immediately preceding section 21.359(e)(3)(G)(i) where it reads "up to 4 set gillnets that are each not more than 35 fathoms in length, 105 fathoms in aggregate length, and 29 meshes in depth..." (Read as: Three 35 fathom nets or 4 shorter nets with the same aggregate length.) The issue here is that while it is true that the majority of participants in the fishery fish "standard" 35 fathom long nets there is in fact regulatory allowance in the general gear definitions to break your 105 fathoms of aggregate length into 4 shorter nets and 35 fathoms is in fact just the maximum legal length of a net. (See 5AAC 21.331(d)). We do not believe there was any intention when restricting gear to 70 fathoms per permit in the King Salmon Plan to disproportionately harm people who fished shorter nets. For very many practical reasons it is extremely difficult to make either nets or locations longer especially in this current age of heavily restrictive management and financial uncertainty in the fishery. It is much easier to shorten them slightly.

We support proposal 94 to include uniformity throughout the language in this section regulating to aggregate length of gear under the Kenai River Late Run King Salmon Management plan.

Proposal 97—SUPPORT

PROPOSAL 97 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Amend the Kenai Late-Run King Salmon Management Plan to provide additional fishing opportunity in the sport and set gillnet commercial fisheries.**

PROPOSED BY: **Gary Hollier.**

We support Proposal 97. Under current regulation, 5 AAC 21.359 (d), if the projected late-run king salmon escapement is less than 15,000 king salmon 75 cm mid eye to tail fork and longer, the department shall close (1) (2) (3). (1) closes sport fisheries, (2) closes drift fleet area within one mile of the Kenai Peninsula shoreline, north of the Kenai River and one and one-half miles south of the Kenai River. (3) closes the set net fishery in the Upper Subdistrict of the Central District. This proposal addresses fishing opportunities, for sport and commercial fishermen, under the KRLRKSMP. If the preseason estimate for large King Salmon to the Kenai River is between the 13,500 (SEG) and 15,000 (OEG), in this proposal, ADFG would make an **in-season** assessment of the Kenai River Late Run King Salmon after July 20. This is the 33% quartile of the run. This would be consistent with 5 AAC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan. Under this plan, ADFG makes the determination of run strength of sockeye to the Kenai River after July 20.

Depending on the projection of run strength on July 20, appropriate regulatory actions will be taken. It would be clearly stated in the KRLRKSMP that it is the **INTENT** of the

Board of Fish (BOF), that whenever the preseason estimate is between **13,500 - 15,000** large King Salmon to the Kenai River, the following action will be taken by ADFG.

1. The sport fishery in the Kenai River would be open for catch and release, no bait, single hook.

2. The East Side Set Net (ESSN) fishery would be open for 24 hours per week.

A. Gear would be restricted to one net per permit, not more than 29 meshes deep. (A 78.5% reduction in gear, that is allowed, by CFEC, for set net permit holders in Cook Inlet.)

B. There would be a 36 hour continuous closure per week between 7:00 pm Thursday and 7:00 am Friday.

C. After July 20 if the OEG is not projected, the king salmon sport fishery in the Kenai River will close. The ESSN fishery will close until the OEG can be projected.

We support options in the 600ft fisheries of Upper Cook Inlet that provide the Eastside Setnet fishery some opportunity to harvest their target stock of sockeye.

Proposal 101—OPPOSE

PROPOSAL 101 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Remove paired restrictive time and gear exemption from the 600-foot commercial set gillnet fishery in the Upper Subdistrict.**

PROPOSED BY: **Kenai River Professional Guide Association.**

We oppose Proposal 101. We do not support reducing harvest opportunity in the Eastside Setnet fishery on target sockeye by removing the hours exemption towards weekly hour limits in the Upper Subdistrict set gillnet (ESSN) 600 ft fishery in the Kenai River Late-Run King Salmon Management Plan (KRLRKSMP).

This proposal would reduce the harvest of sockeye salmon in the ESSN fishery by an unknown amount and subsequently increase the number of salmon inriver and available to sport and personal use fisheries by reducing the amount of time that 600 ft commercial periods could be opened. This could decrease the department's ability to meet inriver and escapement goals for sockeye salmon in the Kenai and Kasilof Rivers depending on abundance.

Currently, any potential ESSN 600-foot opening is also gear restricted with one of two available options discretionarily available to the Commissioner. The hours used while restricted to 600 feet of the mean high tide mark on the Kenai Peninsula shoreline are not included towards the weekly hour restrictions of the KRLKSMP. This was intended to leave needed available hours in the plan for target openings of the full fishery to maximize sockeye harvest and achieve sockeye management objectives.

We do not support proposal 101. The 600 foot fishery is already extremely reduced

in time, gear and area. This proposal is an attempt to eliminate opportunity in the Eastside Setnet fishery.

Proposal 81 and 102—SUPPORT

PROPOSALS 81 and 102 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify the Kenai River Late-Run King Salmon Management Plan. Provide additional commercial salmon fishing opportunity with set gillnet gear in the Upper Subdistrict.**

PROPOSED BY: **Travis Every**

We support Proposal 81 and 102. Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in a foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon, and have inflicted severe negative economic impacts to the fishermen, as well as the Kenai Peninsula Borough and all of the local communities.

These proposals would provide the Alaska Department of Fish and Game an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar projects 13,500 fish, which is the sustainable escapement goal for Kenai River large late-run king salmon established by the department, thereby assuring that a sustainable level of king salmon escapement is achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. The current plan closes the sockeye-targeted set gillnet fishery and immediately liberalizes the commercial drift fishery, the personal use fisheries, and commercial guided in-river sport sockeye fisheries to targeted sockeye salmon.

We support options in the 600ft fisheries of Upper Cook Inlet that provide the Eastside Setnet fishery some opportunity to harvest their target stock of sockeye based on abundance of that stock as it moves through the district.

Proposal 100—SUPPORT

PROPOSAL 100 – **5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Allow a 600-foot set gillnet commercial fishery when Kenai River late-run large king salmon escapements exceed 13,500 fish.**

PROPOSED BY: **Gary Hollier**

We support Proposal 100. Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon. Since the adoption of the KRLRKSMP, the Kenai and Kasilof Rivers have exceeded their Board of Fish mandated in-river and BEG sockeye salmon goals every year. This proposal provides ADFG an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar goal exceeds 13,500 fish, which is the sustainable escapement goal (SEG) for Kenai Rive late-run large king salmon established by ADFG, thereby assuring that a sustainable level of escapement is achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. In considering these emergency order openings the department will evaluate the number and size of king salmon harvested in the set gillnet fishery and manage conservatively to minimize king salmon harvest as well as the need to ensure provisions of other related management plans are met.

We support options in the 600ft fisheries of Upper Cook Inlet that provide the Eastside Setnet fishery some opportunity to harvest their target stock of sockeye.

PROPOSAL 106 —OPPOSE

We oppose Proposal 106. Proposal 106 states that in 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan is asking to restrict legal set gillnet gear when the Upper Subdistrict commercial salmon fishery is open within 600 feet of shore.

They are requesting that 5 AAC 21.359. (e)(3)(F) be written as follows: Upper Subdistrict set gillnet commercial fishing periods that are limited under this section may be limited under this section may be limited to fishing within 600 feet of the mean high tide mark and are exempt from hour [AND GEAR] limitations identified under (e)(3)(A)-(E) of this section.

They state, “the issue is that additional tools are needed to selectively harvest Kenai sockeye in the commercial Eastside set gillnet fishery during periods of acute low abundance of Kenai kings.” And, “harvest of king salmon is a significant constraint on the opportunity to catch more-abundant sockeye in the Upper Cook Inlet set gillnet fishery.”

The statement “The Kenai River Late-Run King Salmon Management Plan (e)(3)(F) currently exempts Upper Subdistrict set gillnet commercial fishing periods within 600 feet of the mean high tide mark from hour and gear limitations that otherwise apply under paired restrictions.” is not correct.

Paired restrictions do provide for gear limitations in the Eastside Setnet fishery.

The proposer in this proposal is incorrect. On July 20, 2021 the department opened set gillnetting on all beaches within 600ft with gear restrictions. The restriction per 5 AAC 21.359. (e)(3)(F)(ii) was for the use of two (2) **29 mesh deep nets** or **(1) 45 mesh deep net, not more than 35 fathoms in length** with no web size restrictions.

Setnetters were incentivized to use shallower nets within that regulation chosen by the department that day. The department reduced the gear to the lowest option available to them under the current management plan. They not only opened the ESSN with gear restrictions, but they also extended the opener to target both Kenai and Kasilof sockeye headed to their natal rivers based on abundance of those sockeye on the beaches. The 600 ft fishery was used **correctly** in this situation and set a precedence with that use to target copious amounts of sockeye on the beaches with the goal to reduce the harvest of Chinook Salmon while under the LRKRKS Management plan. By definition, they "set an example or standard that influences future actions, decisions, or judgments. And set the guidepost for how to handle similar situations in the future." Their actions that day validates that fact that they do have the ability to both reduce gear (nets) and incentivize fishermen who make the choice to fish shallower gear.

The regulation currently reads:

(F) Upper Subdistrict set gillnet commercial fishing periods that are limited under this section may be limited under this section may be limited to fishing within 600 feet of the mean high tide mark and are exempt from hour and gear limitations identified under **(e)(3)(A)-(E)** of this section.

The next letter is letter (G) which reads:

(G) if commercial fishing is limited under (e) (3) of this section, the operation of setnets operated by a CFEC permit holder shall be restricted to:

(i)up to four set gillnets that are each not more than 35 fathoms in length, 105 fathoms in aggregate length and 29 meshes in depth, or two set gillnets that are each not more than 35 fathoms in length and 45 meshes in depth, or two set gillnets that are each not more than 35 fathoms in length and 45 meshes in depth; set gillnets used that are not more than 29 meshes in depth must be identified at the end of the gillnet with an attached blue buoy that is not less than nine and one-half inches in diameter, or

(ii) up to two set gillnets that are each not more than 35 fathoms in length and 29 meshes in depth or one set gillnet that is not more than 35 fathoms in length and 45 mesh in depth must be identified at the end of the gillnet with an attached blue buoy that is not less than nine and one-half inches in diameter.

The letter (F) falls under section **(e) (3),** so this regulation **does** allow the department to do step downs in the plan for gear with a SHALL. Let us explain how (i) and (ii) read. Below is an explanation of the gear specifications under (e) (3) (G) (i) and (ii):

(i) Provides incentives as follows:

Incentivizes the use of legal gear up to (4 or 3) **four 29 (most use three) mesh deep nets up to 35 fathoms in length** and not more than 105 fathoms aggregate.

Penalizes the use of legal gear with only (2) **two 45 mesh deep nets** and not more than **35 fathoms in length each.**

OR the department can choose gear defined in (ii)

(ii) Provides incentives as follows:

Incentivizes the use of legal gear up to (2) **two 29 mesh deep nets and not more than 35 fathoms in length each.**

Penalizes the use of legal gear with only (1) **one 45 mesh deep nets** and not more **than 35 fathoms in length each.**

In Upper Cook Inlet an SO4H permit holder in the Eastside Setnet Statistical area can fish **(3) three setnets not more than 45 mesh in depth and 35 fathoms in length**. (Except if nets are shorter than 35 fathoms in length, they may use up to four, but total aggregate length cannot exceed 105 fathoms.) So, fishing gear in (i) is a reduction in gear that a SO4H permit holder can fish under the Kenai and Kasilof Sockeye plans.

The plan already incentivizes set netters to use shorter nets and use more nets based on action that is preceded by the **SHALL** in Letter (G) of the plan. Gear restrictions in (F) refer to (A-E), (G) stands alone, but still falls under the entire section of (e) (3) as stated in the plan which then drops them to gear reductions under paired restrictions in (i) and (ii).

We oppose Proposal 106. The proposers stated goal to "improve selectivity of the 600-foot fishery tool by use of shallow gillnets. Direct or incentivize use of 29" rather than 45" gillnets in 600-foot openers of the east side set net fishery under paired restrictions Kenai River Late-Run King Salmon Management Plan 5 AAC 21.359" is already in regulation. Therefore, deleting the word GEAR from the regulation does nothing to change the Department's ability to reduce gear in the ESSN fishery under letter F. The regulation is being misread by the proposer and at the very most is a housekeeping issue for the Department and could be more clearly stated within the regulation to avoid future confusion.

Proposal 112—OPPOSE

PROPOSAL 112 – **5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Increase the upper bound of the Kenai River late-run sockeye salmon inriver goal.**

PROPOSED BY: **Kenai River Sportfishing Association.**

We Oppose Proposal 112. The upstream users are already not harvesting all available number of the sockeye that have been escaping to the Kenai River users. Why would we want to add more sockeye and increase the foregone harvest going to the Kenai River? It doesn't make sense. The current inriver goals are already too high and threaten the future runs of Sockeye Salmon based on the scientific knowledge of density dependence for the stock. This proposal is purely allocative and not warranted.

According to the Alaska Department of Fish and Game comments in RC 2, Vol 2 page 5, since this stock was designated primarily for commercial uses (1999–2023), the ESSN and drift gillnet combined average annual sockeye salmon harvest has decreased by 28% from 78% to 50%. The sport and personal use fisheries proportions have increased respectively from 13% and 9% to 30% and 20% for a combined 50% of total harvest This shift in harvest patterns is attributed to incremental regulatory restrictions to commercial fisheries associated with weak stock management and board allocation actions.

At the same time personal use and sport fisheries under current management structure does **not appear to be capable of harvesting the surplus number of fish beyond inriver goals that would be needed to achieve the SEG.** Combined Kenai River personal use and sport inriver harvest has declined from a high 5- year average (2008-2013) of 757,346 to a low 5-year average (2018-2022) of 678,459 as inriver abundance increased during those same time periods **(Table 112-1, Figure 112-2).** The decreased commercial harvest and saturation of inriver fisheries contributes to the **Kenai River exceeding escapement goals 30% of years since 1999, with 4 of the last 5 years exceeding the SEG. The Kasilof River has been exceeding escapement goals 80% of years since 1999 and has exceeded the SEG/BEG each year since 2018.** This is occurring even as the average Kenai River sockeye salmon total run decreased by 15% from an average of 3.9 million fish (2003–2012) to 3.3 million (2013–2022) (Table 112-1). In recent years, low abundance of Kenai River king salmon resulted in less commercial fishing time for the ESSN fishery, which reduces sockeye salmon harvest. In 2023, the ESSN fishery did not open due to paired restrictions linked to low Kenai River late-run king salmon abundance.

We oppose Proposal 112. The data does not support the proposal, it is strictly allocative and seeks to limit or eliminate commercial fishing opportunity in the Eastside Setnet Fishery on the two lower tiers of sockeye runs.

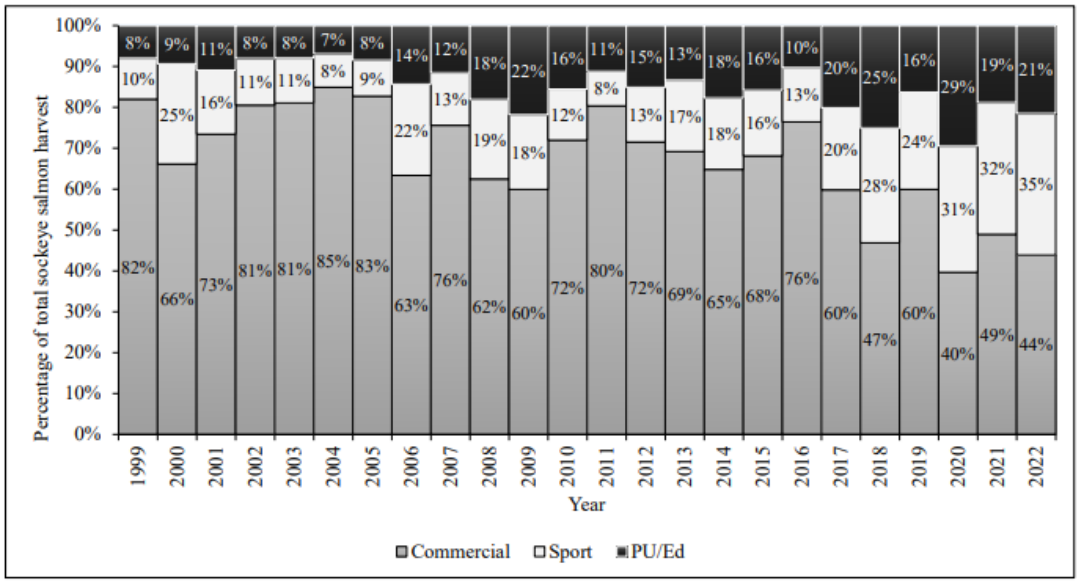


Figure 112-1.–Percentage of total Kenai River late-run sockeye salmon harvest in commercial, sport, personal use fisheries, 1999–2022.

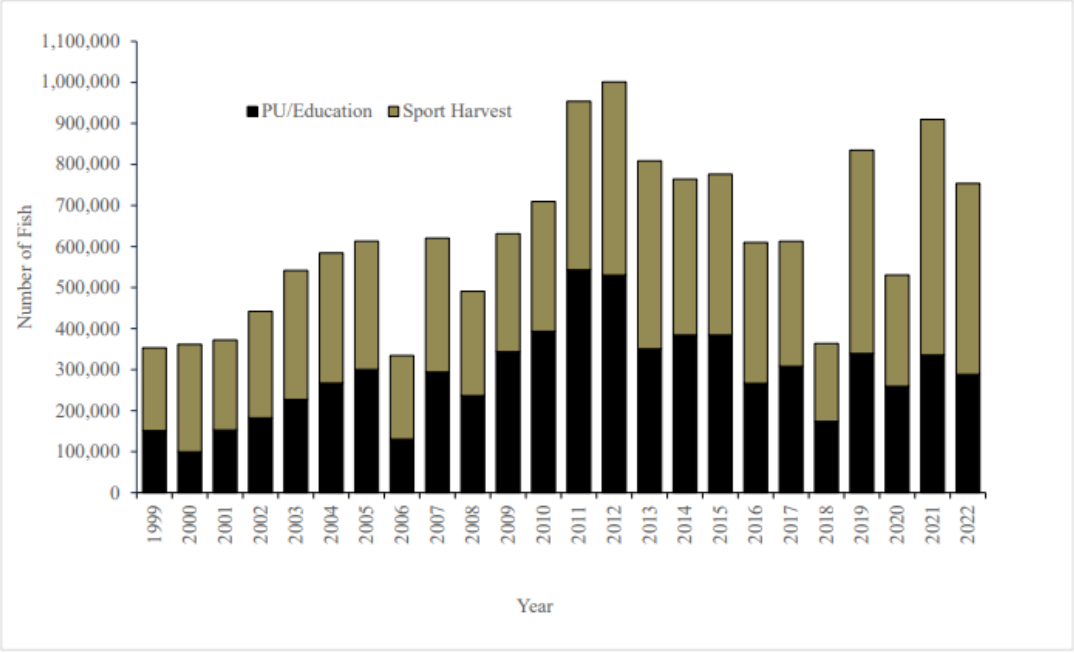


Figure 112-2.–Personal Use/Education (PU), sport and total inriver harvest of Kenai River sockeye salmon.

Proposal 141—OPPOSE

PROPOSAL 141 – **5 AAC 21.331. Gillnet specifications and operations. Restrict set gillnet gear in the Upper Subdistrict .**

PROPOSED BY: **Kenai River Sportfishing Association**

We oppose Proposal 141. This proposal states that "outside of the Kenai River Late-Run King Salmon Management Plan, the use of shorter 29 mesh nets **should** be used by all SO4H permit holders on the Eastside Setnet Fishery. Currently the Upper Cook Inlet Late Run Sockeye Salmon Management Plan and the Kasilof Sockeye Salmon Management Plan allows a full compliment of gear to harvest abundant sockeye when King Salmon stocks in the Kenai River are meeting their management objectives."

In Upper Cook Inlet the use of a full complement of legal gear as defined in 5 AAC 21,330. Gear allows an SO4H permit holder in the Eastside Setnet Statistical area to fish **(3) three setnets not more than 45 mesh in depth and 35 fathoms in length**. (Except if nets are less than 35 fathoms in length, they may use up to four, but total aggregate length cannot exceed 105 fathoms.) The exception to this is for a dual permit holder, the second set of nets must be no more than 29 mesh in depth. This gear is to maximize sockeye harvest according to the Kenai River Late-Run King Salmon Management Plan.

We strongly OPPOSE Proposal 141. Reducing gear net depths under the Kenai River Late Run Sockeye Salmon plan is not warranted when Kenai River Late-Run King Salmon stocks are healthy and recovering, and the fishery is being managed under the KRLRSSMP. This proposal seeks to allocate sockeye salmon away from the Eastside Setnet fishery by reducing the ability to maximize harvest of that targeted stock with an unwarranted reduction in gear.

Proposal 150—OPPOSE

PROPOSAL 150 – **5 AAC 21.XXX. New Section. Create a Kasilof River Late-Run King Salmon Management Plan.**

PROPOSED BY: **Kenai River Sportfishing Association**

We oppose Proposal 150. The proposer is advocating for a management plan for the Kasilof River King Salmon, but nowhere in the plan addresses the pressure on the natural stock when anglers are fishing for hatchery stocks. More important than the plan itself is the fact that the hatchery program should be addressed. If protecting all natural stocks is the goal, then the stocking program of King salmon in the Kasilof River should be discontinued until the natural stocks recover. Anglers can't AVOID the incidental catch or interaction with natural stocks while fishing for hatchery stocks. Also, the Kenai and Kasilof Rivers are managed to separate objectives, genetic species etc. and should not be tied together for management purposes. The Department states in RC 2 that they already have the tools to manage the Kasilof River King Salmon.

We oppose Proposal 150.

KENAI RIVER LATE RUN KING SALMON STOCK OF CONCERN PLAN

The Kenai Peninsula Fishermen's Association looks forward to discussing the complex elements of the Stock of Concern plan during the Committee of the Whole Group 1: Kenai River Late Run King Salmon Stock of Concern Plan.

UPPER COOK INLET SUMMER FISHERY

PROPOSALS 1-5

PROPOSALS

1-5

1	5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan. Amend the Upper Cook Inlet Summer Salt Water King Salmon Sport Fishery Management Plan	No Action
2	5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan. Amend the Upper Cook Inlet Summer Salt Water King Salmon Management Plan	Oppose
3	5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan	Oppose
4	5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan	Oppose
5	5 AAC 58.055. Upper Cook Inlet Summer Salt Water King Salmon Management Plan and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan	No Action

COOK INLET LATE RUN KING SALMON MANAGEMENT PLAN

PROPOSALS 75-110

The future of the historic Eastside Setnet Fishery should not be determined by only looking forward. Looking back at the deep history of this 146 year old fishery is relevant and should be a consideration when making regulatory decisions.

PROPOSALS

75-83

75	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Remove the Kenai River Late-Run King Salmon OEG	Support
76	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Remove the Kenai River Late-Run King Salmon OEG	Support
77	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify the Kenai River Late-Run King Salmon OEG	Support
78	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Remove the Kenai River Late-Run King Salmon OEG	Support
79	5 AAC 21.359. Kenai River Late Run King Salmon Management Plan. Create additional step-down measures to the KRLRKSMP	No Action
80	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify the Kenai River Late-Run King Salmon Management Plan	Support
81	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Provide addition commercial fishing opportunity for salmon within the Kenai River Late-Run King Salmon Management Plan	Support
82	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Repeal portions of intent language from the Kenai River Late-Run King Salmon Management Plan and shorten plan duration	Support
83	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan; 5 AAC 21.310. Fishing seasons; 5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan; 5 AAC 21.365. Kasilof River Salmon Management Plan; and 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Modify the Kenai River Late-Run King Salmon Management Plan	Support

PROPOSALS

84-93

84	5 AAC 21.359 . Kenai River Late-Run King Salmon Management Plan. Close fishing for Kenai River late-run king salmon upstream of river mile 14 when the preseason forecast is below 20,000 fish	No Action
85	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Prohibit use of motorized vessels in the Kenai River if the sport fishery is closed	Support
86	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Prohibit bait in the Kenai River through Oct 31 if the king salmon sport fishery is closed by EO	Support
87	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Prohibit guided sport fishing on the Kenai and Kasilof Rivers when sport fishing for king salmon is closed	Support
88	Prohibit nonresidents from fishing from a guide vessel on the Kenai River if the king salmon sport fishery is closed	Support
89	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Prohibit nonresident anglers from participating in the Kenai River Late-Run king salmon fishery	No Action
90	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan and 5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Expand weekly time-period "windows" where the commercial salmon fishery is closed	Oppose
91	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Amend criteria for commercial set gillnet fishing periods, in the Upper Subdistrict, after August 1	Support
92	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Exempt the East Foreland Section from 'paired restriction' measures in the Kenai River Late-Run King Salmon Management Plan	No Action
93	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Exempt the East Foreland Section from 'paired restriction' management measures within the Kenai River Late-Run King Salmon Management Plan	No Action

PROPOSALS

94-101

94	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan Modify allowable gear when the set gillnet commercial fishery is restricted to achieve the Kenai River late-run king salmon optimal escapement goal	Support
95	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Modify the amount of set gillnet gear that can be used in the Upper Subdistrict set gillnet fishery when restricted to achieve the Kenai River late-run king salmon optimal escapement goal,	Oppose
96	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify operation of set gillnet gear in the Upper Subdistrict	Oppose
97	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Amend the Kenai Late-Run King Salmon Management Plan to provide additional fishing opportunity in the sport and set gillnet commercial fisheries	Support
98	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Modify the commercial set gillnet fishery in the Upper Subdistrict when restricted to achieve the Kenai River late-run king salmon optimal escapement goal	No Action
99	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Make numerous changes to the Kenai River Late-Run King Salmon Management Plan	Support
100	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Allow a 600-foot set gillnet commercial fishery when Kenai River late-run large king salmon escapements exceed 13,500 fish	Support
101	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan and 5 AAC 21.365. Kasilof River Salmon Management Plan. Remove ‘paired restrictive’ time and gear exemption from the 600-foot commercial set gillnet fishery in the Upper Subdistrict	Oppose

PROPOSALS

102-110

102	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Provide additional commercial salmon fishing opportunity with set gillnet gear in the Upper Subdistrict	Support
103	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Allow use of dipnets in the Upper Subdistrict commercial salmon fishery	Support
104	5 AAC 21.XXX. New Section. Adopt a new Kenai River late-run king salmon management plan for the Upper Subdistrict set gillnet fishery	Oppose
105	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Allow a 600-foot set gillnet commercial fishery when the Upper Subdistrict would be closed to conserve Kenai River late-run king salmon	No Action
106	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Restrict legal set gillnet gear when the Upper Subdistrict commercial salmon fishery is open within 600 feet of shore	Oppose
107	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Repeal the 600-foot Upper Subdistrict set gillnet fishery and create a new opportunity with shallow set gillnet gear more than one half mile offshore	Oppose
108	Exempt the 600-foot set gillnet fishery from fishing time and gear restrictions in the Kenai River Late-Run King Salmon Management Plan	Oppose
109	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Create new set gillnet commercial salmon fishing opportunity based on Kasilof River sockeye salmon escapement	No Action
110	5 AAC. 21.359. Kenai River Late-Run King Salmon Management Plan. Provide additional commercial fishing opportunity for set gillnet gear within the Kenai River Late□Run King Salmon Management Plan	Support

COOK INLET KENAI RIVER LATE-RUN SOCKEYE SALMON MANAGEMENT PLAN

PROPOSALS 111-115

Sockeye Salmon stocks in Upper Cook Inlet have many user groups that depend on their sustainability. Sustainablilty of this important species should be closely considered for all users of the resource. Protection of this stock is crucial to the survival of the commercial fisheries that have historically harvested them as they strive to remain economically viable.

PROPOSALS

111-115

111	5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt a Kenai River late-run sockeye salmon optimal escapement goal	No Action
112	5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Increase the upper bound of the Kenai River late-run sockeye salmon inriver goal range	Oppose
113	5AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt an optimal escapement goal for Kenai River late-run sockeye salmon	No Action
114	5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt an Optimal Escapement Goal for Kenai River late-run sockeye salmon	Support
115	5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Modify intent of the Kenai River Late-Run Sockeye Salmon Management Plan	No Action

UPPER SUBDISTRICT SET GILLNET FISHERY / KASILOF RIVER MANAGEMENT PLAN

PROPOSALS 116-120

The Upper Subdistrict Set Gillnet Fishery has been in existence since the early 1880's. Fishing between the traps that were outlawed at Statehood and building the communities that depended on commercial fishing for their food and shelter. The decendents of the original setnetters are still in our fishery today. These decendents strive to survive and remain economically viable on their family fish sites and still wish to continue to contribute to the economy of the State of Alaska and the Kenai Peninsula.

PROPOSALS

116-117

116	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan; 5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan; 5 AAC 21.365. Kasilof River Salmon Management Plan. Repeal mandatory weekly closures in the commercial set gillnet fishery	Support
117	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan.; 5 AAC 21. 366. Northern District King Salmon Management Plan. Repeal 'paired restrictions' from Upper Cook Inlet salmon management plans	Support

PROPOSALS

118-120

118	5AAC 21.365. Kasilof River Salmon Management Plan. Reduce the Kasilof River sockeye salmon optimal escapement goal	No Action
119	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Allow the Kasilof River Special Harvest Area to remain open when the remainder of the commercial set gillnet fishery in the Upper Subdistrict is closed	Support
120	5 AAC 21.365. Kasilof River Salmon Management Plan. Repeal portions of intent language within the Kasilof River Salmon Management Plan	Support

COOK INLET CENTRAL DRIFT GILLNET FISHERY MANAGEMENT PLAN

PROPOSALS 121-127

PROPOSALS

121-127

121	5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Modify intent language within the Central District Drift Gillnet Fishery Management Plan	Support
122	5 AAC 21.310. Fishing Seasons; 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans	Support
123	5 AAC 21.310. Fishing Seasons; 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans	Support
124	5 AAC 21.310. Fishing Seasons.; 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans	Support
125	5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal sections of the Central District Drift Gillnet Fishery Management Plan to provide additional commercial salmon fishing opportunity with drift gillnet gear	Support
126	5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Increase drift gillnet fishing opportunity in Drift Gillnet Area 2	No Action
127	5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Modify weekly fishing periods in the Central District Drift Gillnet Fishery Management Plan	No Action

COOK INLET FISHING SEASONS, WEEKLY PERIODS, SETNET GEAR AND REGISTRATION

PROPOSALS 28-143, 43

PROPOSALS

128-136

128	5 AAC 21.310 Fishing Seasons. Provide additional commercial salmon fishing opportunity with set gillnet gear in the Upper Subdistrict	Support
129	Increase Upper Subdistrict set gillnet commercial salmon fishing opportunity	Support
130	5 AAC 21.310. Fishing Seasons. Lengthen Upper Subdistrict set gillnet commercial salmon fishing season	Support
131	5 AAC 21.320 Weekly fishing periods. Modify Northern District weekly commercial fishing period	Support
132	5 AAC 21.320. Weekly fishing periods Provide additional commercial salmon fishing opportunity in Upper Cook Inlet based on salmon escapement	No Action
133	5 AAC 21.320. Weekly fishing periods, 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan, 5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan, 5 AAC 21.353 Central District Drift Gillnet Management Plan. Modify weekly fishing periods in the Upper Subdistrict and adopt new 'paired restrictive' management measures	Support
134	5 AAC 21.320. Weekly fishing periods. Modify weekly fishing periods	No Action
135	5 AAC 21.350. Closed waters. Close the Chinitna Bay Subdistrict to commercial fishing for salmon	Oppose
136	5 AAC 21.350. Closed waters. Increase waters closed to commercial fishing for salmon	Oppose
137	5 AAC 21.350. Closed waters. Increase waters closed to commercial fishing in Upper Cook Inlet	Oppose
138	5 AAC 21.335. Minimum distance between units of gear; 5 AAC 21.331. Gillnet specifications and operations. Allow use of a seine lead in the set gillnet fishery and define minimum distance between gear	No Action
139	5 AAC 21.330. Gear. Allow use of reef nets in the Upper Cook Inlet commercial salmon fishery	No Action
140	Allow use of reef nets in the Upper Cook Inlet commercial salmon fishery	No

PROPOSALS

141-143, 43

141	Restrict set gillnet gear in the Upper Subdistrict	Oppose
142	5 AAC 21.363. Upper Cook Inlet Salmon Management Plan . Establish new commercial fishery reporting requirements in Upper Cook Inlet a	No Action
143	5 AAC 21.345 Registration. Allow Upper Cook Inlet set gillnet permit holders to fish in more than one registration area per year	Support
43	5 AAC 40.820. Basic Management Plans. Amend Basic Management Plans as follows (This proposal will be heard and public testimony will be taken at both the LCI and UCI meetings and deliberated at the UCI meeting):	No Action

COOK INLET PINK SALMON MANAGEMENT PLAN /COOK INLET KENAI RIVER VESSELS AND HABITAT RESTRICTIONS

PROPOSALS 144-152

PROPOSALS

144-150

144	5 AAC 21.354. Cook Inlet Pink Salmon Management Plan. Amend the Cook Inlet Pink Salmon Management Plan	Support
145	5 AAC 21.354. Cook Inlet Pink Salmon Management Plan. Increase commercial fishing opportunity in the Cook Inlet Pink Salmon Management Plan	Support
146	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. 186 Modify the Kenai River king salmon annual limit	Support
147	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. 186 Modify the Kenai River king salmon annual limit	Support
148	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Prohibit fishing for king salmon from a motorized vessel in the Kenai River	Support
149	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Require mandatory retention of Kenai River king salmon	Oppose
150	5 AAC 21.XXX. New Section. Create a Kasilof River Late-Run King Salmon Management Plan	Oppose

PROPOSALS

151-152

151	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Add days and area to the nonmotorized restrictions on the Kenai River	Support
152	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Prohibit motorized vessels on the Kenai River	Support

COOK INLET GUIDES KENAI AND KASILOF RIVER

PROPOSALS 153-164

PROPOSALS

153-164

153	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow guiding on the Kenai River on Sundays and Mondays	Oppose
154	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area Allow guiding on the Kenai River without day and time restrictions if the king salmon fishery is closed	Oppose
155	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow guiding on the Kenai River on Sundays and Mondays if king salmon fishery is closed	Oppose
156	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area.	Oppose
157	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow anglers to fish on the Kenai River on Mondays in August and September from a guided vessel	Oppose
158	5 AAC 57.121Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Allow sport fishing from a guide vessel on Sunday and Monday with no hour restrictions	Oppose
159	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow sport fishing from a guide vessel on the Kenai River on Mondays from August 1–November 30	Oppose
160	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Limit guided activities on the Kenai River from May 1–July 31	Support
161	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Restrict guided shoreline anglers on the Kenai River to 6 a.m. to 6 p.m., from July 1 to August 15	Support
162	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow guiding on the Kenai River prior to 6:00 a.m. and after 6:00 p.m	Oppose
163	5 AAC 56.140. Kasilof River guiding and guided fishing requirements. Reduce the time fishing from and anchoring a guided vessel is allowed in the Kasilof River	Support
164	5 AAC 56.140. Kasilof River guiding and guided fishing requirements. Limit sport fish guiding in the Kasilof River	Support

COOK INLET KENAI, KASILOF AND RUSSIAN RIVERS

PROPOSALS 165-188

PROPOSALS

165-175

165	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Allow sport fishing in the Kenai River with only one unbaited, single-hook, artificial lure from January – July	No Action
166	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Expand time and area waters of the Kenai River are limited to only one unbaited, single- hook, artificial lure and redefine "artificial fly"	No Action
167	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Expand time and area in waters of the Kenai River that are limited to only one unbaited, sin-gle□hook, artificial lure	No Action
168	5 AAC 57.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Allow anglers to use two artificial flies in tandem on the Kenai River	Oppose
169	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. and 5 AAC 56.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Change the definition of "bag limit" for sockeye salmon in the Kenai and Kasilof Rivers	Oppose
170	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Allow backtrolling in a section of the Kenai River	Oppose
171	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Allow anglers to fish downstream of the Soldotna Bridge after taking a limit of coho salmon	Oppose
172	5 AAC 57.140. Kenai River guiding and guided fishing requirements in the Kenai River Drainage Area. Allow fishing from a vessel after retention of a limit of coho salmon on the Kenai River	Oppose
173	5 AAC 57.170. Kenai River Coho Salmon Management Plan Modify regulations for the Kenai River August coho salmon fishery	Support
174	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage. Regulate use of bait in Kenai River in August	Oppose
175	5 AAC 57.170. Kenai River Coho Salmon Management Plan. Reduce the coho salmon limits in the Kenai River to two fish after August 30	No Action

PROPOSALS

176-185

176	5 AAC 57.170. Kenai River Coho Salmon Management Plan and 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Reduce the coho salmon limit on Kenai River after September 1	Support
177	5 AAC 57.170. Kenai River Coho Salmon Management Plan and 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Modify Kenai River coho salmon season and bag	Support
178	5 AAC 57.170. Kenai River Coho Salmon Management Plan. Reduce the season for the Kenai River coho salmon sport fishery	Support
179	5 AAC 57.123. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Upper Section of the Kenai River Drainage Area. Close additional waters to sport fishing in the upper Kenai River	Support
180	5 AAC 57.123. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Upper Section of the Kenai River Drainage Area. Close waters of the Kenai River from the Sterling Highway Bridge to Kenai Lake to sport fishing	Support
181	5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Close waters of the Kenai River to sport fishing from January 1 – June 10	Support
182	5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Prohibit nonresident sport fishing on the Kenai River	No Action
183	5 AAC 57.150. Russian River Sockeye Management Plan. Allow the department to take action sooner to harvest surplus in Russian River sockeye salmon runs a	Oppose
184	5 AAC 56.122. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Move 3-mile boundary marker to Old Kasilof Landing (river mile 4)	No Action
185	5 AAC 56.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area Allow only unbaited, single-hook artificial lures in the Kasilof River	Support

PROPOSALS

182-188

186	5 AAC 56.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Update the stocked lakes list for the Kenai Peninsula Area	Support
187	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Remove the effective date of regulation pertaining to sport fishing from a motor driven boat	Support
188	5 AAC 57.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Prohibit bait and multiple hooks in Hidden Lake	No Action

COOK INLET

KENAI, KASILOF PERSONAL USE

PROPOSALS 189-204

PROPOSALS

189-200

189	5 AAC 77.5XX. New Section. Require personal use guides in Cook Inlet to adhere to sport fishing guiding requirements	Support
190	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Establish requirements to guide in Upper Cook Inlet personal use fisheries	Support
191	5 AAC 77.525. Personal use salmon fishery Adjust annual limits in Cook Inlet personal use fisheries based on abundance	Oppose
192	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Close personal use fisheries based on commercial openings	Oppose
193	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Require king salmon caught and released in Cook Inlet personal use fisheries not be removed from the water	Support
194	5 AAC 77.540 Upper Cook Inlet Personal Use Salmon Fishery Management Plan 225 Allow retention of Dolly Varden in Kenai/Kasilof personal use dipnet fisheries	Oppose
195	5 AAC 77.540. Upper Cook Inlet Personal use Salmon Fishery Management Plan. Restrict EO authority to only extend fishing time of the shore-based fishery in the Kenai River personal use fishery	Support
196	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Prohibit personal use fishing on the Kenai River from an anchored vessel	Support
197	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Prohibit retention of king salmon in the Kenai River personal use fishery	Support
198	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Prohibit transport of Kenai River personal use fish by motorized vessel upstream of the Warren Ames Bridge	Support
199	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Prohibit transport of Kasilof River personal use fish by motorized vessel	Support
200	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Close the Kasilof personal use gillnet fishery when Kenai or Kasilof Rivers sport fisheries are closed	Support

PROPOSALS

201-204

201	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Close the Kenai River personal use fishery when drift fishery is restricted a	No Action
202	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Reduce the legal mesh size of a set gillnet in the UCI personal use fisheries	No Action
203	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Move the regulatory markers for the Kasilof River personal use dip net fishery	Oppose
204	5 AAC 01.593. Upper Yentna River subsistence salmon fishery. Allow hook and line attached to a rod or pole as subsistence gear to take king salmon in the Yentna River drainage	Oppose

COOK INLET NORTHERN DISTRICT COMMERCIAL SALMON

PROPOSALS 205-213

PROPOSALS

205-213

205	5 AAC 21.366. Northern District King Salmon Management Plan. Increase waters closed to commercial fishing for salmon in the Northen District King Salmon Management Plan	Oppose
206	5 AAC 21.366. Northern District King Salmon Management Plan. Reduce the number of king salmon that may be commercially harvested in the Northern District of Upper Cook Inlet	No Action
207	5 AAC 21.366. Northern District King Salmon Management Plan. Adopt additional restrictions in the Northern District King Salmon Management Plan	Oppose
208	5 AAC 21.366. Northern District King Salmon Management Plan. Adopt additional restrictions in the Northern District King Salmon Management Plan	Oppose
209	5 AAC 5 AAC 21.366. Northern District King Salmon Management Plan. Close the commercial king salmon fishery in the Northern District	Oppose
210	5 AAC 21.358. Northern District Salmon Management Plan and 21.366. Northern District King Salmon Management Plan. Modify the Northern District Salmon Management Plan and Northern District King Salmon Management Plan a	Oppose
211	5 AAC 21.358. Northern District Salmon Management Plan. Repeal certain restrictive provisions of the Northern District Salmon Management Plan	Support
212	5 AAC 21.358. Northern District Salmon Management Plan. Adopt additional restrictions in the Northern District Salmon Management Plan	Oppose
213	5 AAC 21.358. Northern District Salmon Management Plan. Adopt new ‘paired restrictive’ management measures for the Northern District commercial salmon set gillnet fishery	Oppose

COOK INLET SMELT

PROPOSALS 214-217

PROPOSALS

214-217

214	5 AAC 21.505. Cook Inlet Smelt Fishery Management Plan. Reduce the commercial smelt guideline harvest level in Upper Cook Inlet	Oppose
215	5 AAC 21.358 Northern District Salmon Management Plan. Provide additional commercial fishing opportunity for salmon within the Northern District Salmon Management Plan	Support
216	5 AAC 21.505. Cook Inlet Smelt Fishery Management Plan. Reduce the commercial smelt guideline harvest level in Upper Cook Inlet	No Action
217	5 AAC 21.505 Cook Inlet Smelt Fishery Management Plan. Repeal the Cook Inlet Smelt Fishery Management Plan	Oppose

COOK INLET SUSITNA SPORTFISHERIES
COOK INLET AREAWIDE SPORTFISHERIES

PROPOSALS 218-233

PROPOSALS

218-228

218	5 AAC 61.118. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 4 of the Susitna River Drainage Area. Allow harvest of king salmon between 20 and 24 inches in Unit 4 of the Susitna River Drainage Area	No Action
219	5 AAC 61.114. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 2 of the Susitna River Drainage Area. Close fishing for all species within the confluence of Unit 2 waters when sport fishing for king salmon is closed	No Action
220	5 AAC 62.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the West Cook Inlet Area. Open additional waters in the Big River drainage to sport fishing for coho salmon	No Action
221	5 AAC 61.110. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Susitna River Drainage Area. Create a bag and possession limit of 3 coho salmon in the Susitna River Drainage	No Action
222	5 AAC 61.110. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Susitna River Drainage Area. Increase the Susitna River drainage sport fish limits for pink salmon	No Action
223	5 AAC 61.185. Special management areas for rainbow trout in the Susitna River Drainage Area. Redefine the special management areas for rainbow trout in the Susitna River Drainage Area	No Action
224	5 AAC 61.185. Special management areas for rainbow trout in the Susitna River Drainage Area. Extend the special management areas for rainbow trout to include the portion of Willow Creek upstream of the Parks Highway	No Action
225	5 AAC 61.118. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 4 of the Susitna River Drainage Area. Open rainbow trout fishing in Unit 4 of the Susitna River drainage year-round with a bag limit of 5 fish, 10 in possession	No Action
226	5 AAC 61.110. General Provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Susitna River Drainage Area Allow anglers to use two artificial lures in tandem in Susitna River Drainage waters	No Action
227	5 AAC 61.118. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 4 of the Susitna River Drainage Area. Remove the length restriction on Dolly Varden in Unit 4	No Action
228	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Close dipnetting in the vicinity of Anderson Creek during the personal use fishery on the lower Susitna River	No Action

PROPOSALS

229-231

229	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Increase the number of days the Susitna River dip net fishery is	No Action
230	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Increase the open season of the Susitna River dipnet fishery	No Action
231	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Modify dates of the Susitna River dip net fishery	Oppose

PROPOSALS

232-233

232	5 AAC 56.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area; 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area; 5 AAC 58.030. Methods, means, and general provisions – Finfish; 5 AAC 59.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area; 5 AAC 60.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area; 5 AAC 61.110. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Susitna River Drainage Area; and 62.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the West Cook Inlet Area. Allow Alaska residents to sport fish additional gear and take multiple limits in Upper Cook Inlet	Oppose
233	Establish sport fishing derby approval process	No Action

COOK INLET KNIK RIVER AREA

PROPOSALS 234-249

PROPOSALS

234-242

234	5 AAC 60.105. Description of the Knik Arm Drainages Area. Clarify the northern boundary of the Knik Arm management area and the Palmer-Wasilla Zone and exclude certain flowing waters from the Palmer-Wasilla Zone	No Action
235	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Reduce the size of the Palmer - Wasilla Zone	No Action
236	5 AAC 60.120. General provisions for season, bag, possession, and size limits, and methods and means for the Knik Arm Drainage Area. Update the stocked lakes list for the Knik Arm drainage area	No Action
237	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Allow bow and spear as legal gear for northern pike and Alaska blackfish year round in the Palmer□Wasilla Zone	No Action
238	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Establish a motor size restriction for the Little Susitna River a	No Action
239	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area Establish a large king salmon escapement goal for the Little Susitna River	No Action
240	5 AAC 60.122. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Increase the number of days bait is allowed in the Little Susitna River drainage	No Action
241	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area Allow use of bait in the Little Susitna River sport fishery based on location of commercial fishery openings	No Action
242	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Prohibit anglers from releasing coho salmon in the Little Susitna River	No Action

PROPOSALS

243-249

243	5 AAC 60.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Create a bag and possession limit of 3 coho salmon in the Knik Arm Drainages,	No Action
244	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Define the mouth of Fish Creek	No Action
244	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Define the mouth of Fish Creek	No Action
245	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Allow sport fishing in the Fish Creek drainage 7 days a week	No Action
246	5 AAC 60.120. General provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. and 5 AAC 61.110. General provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Susitna River Drainage Area. Update the lists of lakes where anglers may use five lines while fishing for northern pike through the ice in designated Northern Cook Inlet waters a	No Action
247	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Prohibit chumming in Big, Mirror, and Flat Lakes	No Action
248	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Restrict Big Lake Arctic char to catch-and-release in the Fish Creek drainage a	No Action
249	5 AAC 60.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Knik Arm Drainages Area. Remove the effective date of regulation pertaining to sport fishing from a motor driven boat	No Action

COOK INLET ANCHORAGE AREA SPORT AND PERSONAL USE FISHERIES

PROPOSALS 250-255

PROPOSALS

250-255

250	5 AAC 59.122. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area. Modify the closure date for the Ship Creek king salmon fishery	No Action
251	5 AAC 59.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area and 5 AAC 59.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area. Modify the Eklutna River drainage salmon bag and possession limits	No Action
252	5 AAC 59.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Anchorage Bowl Drainages Area and 5 AAC 56.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Increase the bag and possession for salmon, other than king salmon	No Action
253	5 AAC 59.185. Special management areas for rainbow trout in the Anchorage Bowl Drainages Area. Allow anglers to use two artificial flies in tandem in a portion of Campbell Creek	No Action
254	5 AAC 59.185. Special management areas for rainbow trout in the Anchorage Bowl Drainages Area. 283 Add a portion of Chester Creek to the Anchorage Bowl Drainage special management areas for trout	No Action
255	5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Create a personal use dip net fishery for salmon in the 20-Mile and Placer Rivers	No Action

Acknowledgements

Our appreciation to:

Alaska Board of Fisheries Members

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Kenai River Professional Guide ASSOCIATION

Kenai River Professional Guide Association

2024 Upper Cook Inlet Proposal Positions

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KRPGA Introduction

The Kenai River Professional Guide Association (KRPGA) stands as the unified voice for all fishing guides along the Kenai River and its surrounding areas. Our community is bound by a shared dedication to preserving this extraordinary natural resource and the livelihoods it sustains.

Representing every facet of the fishing guide industry, KRPGA has invested over 100 hours in committee meetings, engaging in extensive discussions to meticulously craft our Proposal Positions for the 2024 Upper Cook Inlet meeting. These positions reflect our commitment to responsible and sustainable guiding practices, ensuring the Kenai River remains a thriving ecosystem for both nature and the communities it supports.

At the heart of our mission is the acknowledgment that the fishing guide industry is a cornerstone of the local economy, supporting not only guides but also a myriad of local businesses. KRPGA is steadfast in its commitment to establishing and fostering the economic vitality of the local community, recognizing the profound impact the fishing guide industry has on the region's prosperity. Welcome to KRPGA, where passion meets purpose, and the voices of all guides resonate in the pursuit of conservation, community well-being, and economic sustainability.

Proposal 75

Seeks to remove Kenai River Late Run King Salmon (15,000) OEG

Oppose

We support the 15,000 OEG. We are not looking for any new opportunity below the OEG.

Proposal 76

Seeks to remove Kenai River Late Run King Salmon (15,000) OEG

Oppose

We support the OEG at 15,000. We are not looking for any new opportunity below the OEG.

Proposal 77

Seeks to modify OEG from 15,000 to 12,000 Large Late Run Kings

Oppose

A series of in river compromises has led to a (previous) board generated OEG. Making an OEG lower than a department SEG shows no effort in conservation.

Proposal 78

Seeks to remove Kenai River Late Run King Salmon (15,000) OEG

Oppose

We support the 15,000 OEG. We are not looking for any new opportunity below the OEG.

Proposal 79

Seeks to add additional step down in the Kenai River Late Run Management Plan

Oppose

This proposal ignores the OEG and allows 24 hours of commercial fishing with one 29 mesh net per permit and would only open in-river sport fishery from Mile 10 down. Only a small portion of these 10 miles is suitable to fishing and only at certain portions of the tide. We **oppose** any new opportunity below the OEG. The suggested paired restrictions in this proposal do not provide equitable opportunity between Sport and Commercial.

Proposal 80

Seeks to modify the Kenai River Late Run King Salmon Management Plan to allow opportunity at Projected 11,750.

Oppose

We support the 15,000 OEG. We are not looking for any new opportunity below the OEG. We do not support a Total Allowable Catch (TAC) of 200 Large Kings in both the Kenai and the Kasilof sections independently (total of 400 large kings.) This would incentivize set netters to discard kings and king mortality would increase substantially.

Proposal 81

Seeks to allow two 12-hour fisheries if the SEG is projected to be met (13,500).

Oppose

Allowing fishing opportunity below the OEG (15,000) eliminates the purpose of the OEG. We reaffirm our support for the current OEG of 15,000.

Proposal 82

Seeks to remove sportfish priority for kings and seeks to shorten the duration of the KRLRKSMP.

Oppose

The in-river fishery is the final user group with available opportunities. Prioritizing this group ensures that managers can effectively allocate resources across all user groups.

Proposal 83

Seeks to modify the KRLRKSMP and the KRLRSSMP and Kasilof River Salmon Management Plan

Oppose

We endorse the proposal's intent to adopt a more conservative approach than the status quo. The idea of increasing the escapement goal (OEG) during periods of low ocean production is compelling, as it promotes the potential for a quicker recovery by ensuring more fish reach the spawning beds.

“Step up” paired restrictions contained in this plan shift the burden of conservation to the end user group.

Proposal 84

Seeks to close fishing for Kenai River Late-run King Salmon upstream of river mile 14 when preseason forecast is below 20,000 fish.

Oppose

This poorly written plan fails to address the existing in-river regulations, blatantly overlooking crucial aspects of the current management plans.

Proposal 85

Seeks to eliminate the use of motors below Skilak lake to Warren Ames Bridge.

Oppose

This proposal seeks action that is beyond the board’s authority.

Proposal 86

Prohibit bait in the Kenai River through Oct 31st if the King Salmon sport fishery is closed by EO as follows.

Oppose

The majority of King Salmon typically enter the river by August 15th, and the bulk of spawning is usually completed by September 15th.

Proposal 87

Seeks to prohibit guided fishing on the Kenai and Kasilof rivers if the projected Kenai River Late Run is less than 15,000.

Oppose

This proposal discriminates against guided anglers, potentially raising concerns about its constitutionality.

Proposal 88

Seeks to prohibit non-residents fishing from a guided vessel.

Oppose

This proposal discriminates against guided anglers, potentially raising concerns about its constitutionality.

Proposal 89

Seeks to prohibit non-resident anglers from participating in Kenai River Late Run King Salmon Fishery

Oppose

Reference comments from 87

Proposal 90

Seeks to extend weekly windows when the commercial Salmon fishery is closed in the KRLRKSMP.

Support

We support allowing an additional 12 hours of closures. The extended closure duration is anticipated to result in more fish entering the rivers and more opportunity for the common user.

Proposal 91

Seeks to amend criteria for commercial set gillnet fishing periods after August 1 based on projections.

Oppose

In 2019, the August component of the Kenai River Late Run King Salmon run fell significantly short of projections. We advocate for prioritizing actual escapement numbers over projected escapement numbers especially considering that the Kenai River in-river fishery is already closed by regulation on August 1st.

Proposal 92

Seeks to exempt the East Foreland Section from "paired restrictions."

Oppose

The board re-added this section during the last board cycle, taking into account the regularity of Late Run Kenai River King Salmon to approach the Kenai River mouth from the north, especially given the extreme tidal fluctuations present in Cook Inlet.

Proposal 93

Seeks to exempt the East Foreland Section from "paired restrictions."

Oppose

Reference comments from Proposal 92.

Proposal 94

Seeks to modify allowable gear when the set gillnet commercial fishery is restricted to achieve the Kenai River Late-run King Salmon optimal escapement goal.

Oppose

Oppose as written.

Proposal 95

Seeks to modify set gillnet gear that can be used in the Upper Subdistrict set gillnet fishery when restricted to achieve KRLRKSMP OEG.

Oppose

We are opposed to adding more gear.

Proposal 96

Seeks to restrict the ESSN fishery to flagged nets only.

Oppose

We are uncertain about the actual savings for King Salmon, and we would encourage the department to conduct research on flagged nets to gather more information.

Proposal 97

Seeks to eliminate the OEG (15,000) and use the SEG (13,500)

Oppose

While we appreciate the effort to reduce the ESSN gear and enable the in-river fishery, we believe that maintaining the OEG (Optimal Escapement Goal) will contribute to a more expedient recovery from current stock of concern status.

Proposal 98

Modify the commercial set gillnet fishery in the Upper Subdistrict when restricted to achieve the Kenai River Late-run King Salmon optimal escapement goal.

Oppose

We do not support any new opportunity below the OEG, we firmly oppose.

Proposal 99

Seeks to propose an all-fish goal for KRLRKS and eliminate the large fish goal.

Oppose

We wholeheartedly support the department's stance on using enumeration of large fish as the reliable metric.

Proposal 100

Seeks to allow a 600-foot set gillnet commercial fishery when the Kenai River Late-run Large King Salmon escapement exceeds 13,500 fish.

Oppose

We strongly support the current OEG (15,000), we do not support any new opportunity below the current OEG.

Proposal 101

Seeks to remove "paired restrictions" time and gear exemption from the 600-foot commercial set gillnet fishery in the Upper Subdistrict.

Support

ANY fishing time allocated to the ESSN should be INCLUDED in "paired restrictions."

Proposal 102

Seeks to provide additional commercial salmon fishing opportunity with Set Gillnet gear

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 103

Seeks to allow use of Dipnets in the Upper Subdistrict Commercial Salmon fishery.

Neutral

We echo our stance on no new opportunity below the OEG. However, there is uncertainty about how a new dip net fishery would be implemented and utilized. We appreciate the proposal's attempt to implement less lethal gear options in this mixed stock fishery.

Proposal 104

Seeks to adopt a new Kenai River Late-run King Salmon Management plan.

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 105

Seeks to allow a 600-foot set gillnet fishery when the upper subdistrict would be closed to conserve Kenai River Late Run King Salmon.

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 106

Seeks to restrict legal set gillnet gear when the Upper Subdistrict commercial Salmon fishery is open within 600 feet of shore.

Support with amendment*

We are against any additional opportunity below the OEG. While we support the use of 29 mesh gillnets instead of 45 mesh gillnets, we strongly object to exempting the 600-foot openers of the ESSN fishery from "paired restrictions."

Proposal 107

Seeks to repeal the 600-foot Upper Subdistrict set gillnet fishery and create new opportunity with shallow set gillnet gear more than one half miles offshore.

Neutral

While we maintain support for the concept of shallow nets being fished far enough from shore that they typically would not reach the bottom, we acknowledge that our assumptions lack scientific data. We again echo our assertion that any "600 foot fishery" be included and not exempted from paired restrictions.

Proposal 108

Seeks to exempt the 600-foot set gillnet fishery from fishing time and gear restrictions in the Kenai River Late-run King Salmon Management plan.

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 109

Seeks to create new set gillnet commercial salmon fishing opportunity based on Kasilof Sockeye Salmon escapement.

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 110

Seeks to provide additional fishing opportunity for set gillnet gear.

Oppose

We are opposed to any additional opportunity below the (15,000) OEG.

Proposal 111

Seeks to Adopt a Kenai River Late-Run Sockeye Salmon OEG.

Oppose

Reference comments from proposal 112

Proposal 112

Seeks to Increase the Upper bound of the Kenai River Late-run Sockeye Salmon in river goal range.

Support

Even in recent years when the late run Kenai River Sockeye Salmon escapement goals have been exceeded, it's evident that significant sockeye salmon spawning habitat has not been fully utilized. Returns from years where current escapement goals have been exceeded have still produced returns that exceed current goals.

Proposal 113

Seeks to reduce the OEG goal for Kenai River Late-run Sockeye Salmon.

Oppose

Reference comments from proposal 112.

Proposal 114

Seeks to reduce the (15,000) OEG goal for Kenai River Late-run Sockeye Salmon.

Oppose

Reference comments from proposal 112.

Proposal 115

Seeks to modify intent of the Kenai River Late-Run Sockeye Salmon Management Plan.

Oppose

This proposal aims to eliminate the protections and allocations established by the board for coho salmon.

Proposal 116

Seeks to remove mandatory windows from KRLRKSMP.

Oppose

Mandatory windows for the UCI set gillnet fishery are critical tools towards assuring ample passage of both late run king salmon and sockeye salmon into the Kenai and Kasilof Rivers and gives in-river users a predictable window of opportunity to access the resource during times of reasonable abundance.

Proposal 117

Seeks to repeal all paired restrictions from KRLRKSMP.

Oppose

Paired restrictions are a necessary tool for the department to achieve reasonable parity between user groups, particularly during times of low abundance for king salmon returning Inlet wide. Sharing the burden of conservation among all user groups assures underachieving stocks are protected within mixed stock fisheries.

Proposal 118

Seeks to reduce Kasilof River sockeye escapement goal to 150,000-250,000 regardless of run size.

Oppose

The Kasilof River Sockeye Salmon escapement goal is currently set at a BEG of 140,000 to 320,000 and an OEG of 140,000-370,000. This goal range has proven adequate toward assuring consistent and sustainable returns since being established. We would only support raising the current goal as we feel current carrying capacity is underutilized.

Proposal 119

Seeks to exempt the Kasilof River Special Management Area from closures when set nets are closed under the KRLRKSMP.

Oppose

The KRSHA should remain closed when the Upper Subdistrict commercial set net gillnet fishery is closed under the Kenai River Late Run King Salmon Management Plan. With the absence of a Kasilof River King Salmon management plan and no current method of enumerating the late run of Kasilof River King Salmon, exemption of the KRSHA from paired restrictions in the Kenai River Late Run King Salmon Management Plan would negatively effect both late run Kenai and Kasilof late run king salmon escapement goals. The late run of Kenai River King salmon has failed to meet the lower end of its escapement goals for several consecutive seasons and has been listed as a stock of concern. Late run Kasilof King Salmon management actions have historically mirrored Kenai River late run King Salmon and again, in the absence of a late run Kasilof King Salmon management plan or escapement goal, restrictions to the Kasilof set gill net fisheries (including the KRSHA) are essential to protect Kasilof Late Run King Salmon stocks. "Overescapement" of Kasilof River sockeye salmon goals have not resulted in decreased returns in subsequent years but have produced returns that have exceeded the upper end of the OEG and BEG.

Proposal 120

Seeks to repeal regulatory language that states the BOF should only use the KRSHA "rarely if ever and only for conservation reasons."

Oppose

Reference Comments from proposal 119

Proposal 121

Seeks to remove language from the CDDGFMP which directs the department to ensure adequate escapement to Northern District drainages and to minimize northern district and Kenai River coho harvest.

Oppose

Proposed changes in regulatory language of the CDDGFMP are unwarranted, confusing, and contradictory to management objectives for silver salmon in both the Northern District and Cook Inlet wide including both the Kenai and the Kasilof Rivers. Moreover, the Central District Drift Gillnet Fleet is not a common property user so this proposal would violate the Alaska State Constitution.

Proposal 122

Seeks to repeal the "one percent rule" in the CDDGFMP.

Oppose

The "one percent rule" is an essential tool in the CDDGFMP to naturally indicate the end of the sockeye return and adequately protect silver salmon stocks escaping to the Northern District as well as Inlet Wide including both the Kenai and the Kasilof Rivers. Additionally, while the one percent rule was originally intended to protect coho stocks it is also the only tool in August that has significantly helped king salmon stocks which have struggled to meet minimum escapement goals.

Proposal 123

Seeks to repeals the "one percent rule" in the CDDGFMP.

Oppose

Reference Comments from proposal 122

Proposal 124

Seeks to repeals the "one percent rule" in the CDDGFMP.

Oppose

Reference Comments from proposal 122

Proposal 125

Seeks to open commercial fishing with drift gill nets on the West Side of Cook Inlet in waters that are currently closed after Aug 1.

Oppose

This proposal would result in over exploitation of Northern District and West Cook Inlet silver salmon stocks. Many Northern District silver salmon stocks failed to make their minimum escapement goals in recent years and any additional commercial harvest of these stocks is not sustainable.

Proposal 126

Seeks to open drift area 2 in the CDDGFMP twice a week from 7am to 7pm during all Inlet wide openings throughout the season.

Oppose

Area closures in the CDDGFMP are designed to protect Northern District bound stocks as well as coho stocks on both the West Side Cook Inlet as well as the Kenai and Kasilof Rivers.

Proposal 127

Seeks to allows drift fleet in CDDGFMP 2) 12-hour openers inlets wide and 1) 12-hour opener within 6-mile corridor weekly.

Reference Comments from proposal 125

Proposal 128

Seeks to change language in 5 AAC 221.310 Fishing Seasons ©(ii) from "may" to "will."

Oppose

Allowing any additional set net harvest in the Upper Subdistrict when the Kenai is restricted or closed for king salmon conservation is unacceptable. This removes the department's discretion to protect Kenai River late run king salmon. Moreover, set gill nets with 600 feet of the mean high tide mark are the most effective at harvesting migrating king salmon and should be the last method and means used when Kenai River Late Run King salmon stocks are not projected to meet the lower end of their escapement goals. Concerns expressed regarding "over escapement" of Kasilof and Kenai River sockeye salmon have been proven unwarranted as returns from years that have exceeded the upper end of the goals have continued to consistently exceed the goals.

Proposal 129

Seeks to change language in 5 AAC 221.310 Fishing Seasons c(ii) from "may" to "will" and modifies date that set nets within 600 feet from shore can fish south of Blanchard line from July 1 to June 20 (when Kasilof sections is open and Kenai sections is closed).

Oppose

This is an open fishery in front of a closed fishery and is directing the department to mandatorily open the 600-foot fishery below the Blanchard line with no time restrictions when the Kenai section is closed for Kenai River King Salmon conservation.

Proposal 130

Seeks to lengthen Upper Subdistrict set gillnet season (when closed earlier by EO) from Aug 11-15 to Aug 6-31.

Oppose

Allowing Upper Subdistrict set gill nets to fish past Aug 15 would result in an increased harvest of both late run Kenai king salmon and silver salmon stocks as well as increased harvest of both Northern District king salmon and silver salmon stocks. Since silvers are managed for a sportfish priority this would violate the current management plan.

Proposal 131

Seeks to modify Northern District weekly fishing periods from two days a week to three days of week.

Oppose

Adding an additional day to this fishery would result in unknown additional harvest of Northern District king salmon and silver salmon stocks, many of which have not achieved the lower end of their escapement goals in recent years. Moreover, the majority of Northern District and West Cook Inlet silver salmon stocks do not have established escapement goals or enumeration methods and thus any additional (potential) exploitation on these stocks is unacceptable.

Proposal 132

Seeks to amend all Cook Inlet Commercial Fishing Management Plans to allow three 12-hour openers per week.

Oppose

This proposal fails to recognize the Kenai River Late Run Kenai King Salmon Management Plan and would be in direct conflict with king salmon conservation in both the Kenai and the Kasilof. The Kenai has failed to achieve the lower end of the late run King Salmon escapement goals for the past five years and was recently designated as a stock of concern. "Overescapement" of both the Kenai and the Kasilof late run sockeye salmon return has not resulted in decreased returns but rather has resulted in runs that have consistently exceeded the upper end of the goals.

Proposal 133

Seeks to modify current paired restrictions.

Oppose

This proposal makes no effort to address king salmon conservation as set forth in the early and late run Kenai King Samon management plans. This proposal also attempts to close all user groups to harvest of sockeye salmon during time of low king salmon abundance when all of these user groups are already closed to all fishing for Kenai King salmon. This proposal is largely allocative in nature and not based on any biological need or concern. It prioritizes harvesting sockeye before achieving minimal escapement goals for king salmon. In-river non king salmon directed sport fisheries should not be closed to common use participants when there is a harvestable surplus of salmon species other than king salmon.

Proposal 134

Seeks two regular 12-hour openers inlet wide for all upper Cook Inlet commercial fisheries.

Oppose

This proposal makes no effort to address king salmon conservation as set forth in the early and late run Kenai King Salmon management plans.

Proposal 135

Seeks to Close Chuitna Bay Subdistrict to commercial fishing for chum and coho salmon.

Neutral

Without established enumeration methods and historical stock assessment by the department, it is impossible to collaborate the claims or management actions suggested in this proposal. It is our hope that the department will monitor and access the Chuitna Bay Subdistrict and only allow commercial fishing at levels that allow ample protection for existing stocks.

Proposal 136

Seeks to prohibit commercial drifters from fishing within one mile of Silver Salmon and Shelter Creeks river mouths on the West Side of Cook Inlet.

Support with amendment*

Silver salmon stocks across a vast array of remote West Cook Inlet stream mouths are being exploited at an unknown rate and current stream mouth protections are not sufficient to prevent overfishing. Most stream mouths are protected to the mean low tide mark, which allows commercial nets to fish waters inside stream mouths during high tide cycles and inside tidal channels leading to the rivers. All "anadromous waterways" should have protection of a significant distance (at least one statue mile) from their mouths to prevent overfishing.

Proposal 137

Seeks to close all commercial fishing withing one statute mile of the terminus of Swanson Creek, Bishop Creek, Three-mile Creek, Chuit River, Nikolai Creek, McArthur River, Susitna River and Little Susitna River.

Support with amendment*

Reference comments on proposal 136

Proposal 138

Seeks to allow use of seine lead in ESSN fishery.

Oppose

Poorly written, may violate Alaska State constitutional law banning fish traps.

Proposal 139

Seeks to allow reef nets in Upper Cook Inlet commercial salmon fisheries.

Oppose

May violate Alaska State constitutional law banning fish traps.

Proposal 140

Seeks to allow reef nets in Upper Cook Inlet commercial salmon fisheries.

Oppose

Reference comments on proposal 139

Proposal 141

Seeks a reduction in overall mesh size in the ESSN fishery when not restricted during paired restrictions.

Support

Due to the persistent low abundance of king salmon stocks Cook Inlet wide, current set net mesh size in the ESSN fishery is not sustainable even if the stock rebounds and allows regular fishing periods. While paired restrictions incentivize use of shallow nets, the department does not have the ability to limit mesh size when paired restrictions are not in effect. We support to EO authority but also encourage mesh size research.

Proposal 142

Seeks to establish different reporting criteria for Kings under 20" in length in the commercial fishery.

Oppose

King salmon are in low abundance inlet wide and any liberalization of reporting methods is not warranted.

Proposal 143

Seeks to allow UCI set gillnets permit holders to fish in more than one registration area per year.

Oppose

Upper Cook Inlet Set Gillnet Holders should not be allowed to transient multiple fisheries in one season as this would be too unpredictable for prudent management action across a variety of mixed stock fisheries.

Proposal 43

Seeks to reduce hatchery production to 25% of the year 2000 production.

Support

We support a statewide reduction in hatchery pink salmon production. Hatchery pink salmon compete with wild stocks and ocean productivity is currently at all-time lows.

Proposal 144

Seeks to allow two commercial openers in the ESSN fishery for pink salmon in August regardless of Kenai River late run king salmon escapement numbers.

Oppose

As written, this proposal calls for two additional commercial fishing periods in UCI during even numbered years for harvest of pink salmon. This proposal does not allow the commissioner the discretion to consider sockeye escapement and coho salmon run strength when considering the need for a pink salmon opener in both the Upper Cook Inlet set and drift gillnet fisheries. The current Cook Inlet Pink Salmon Management Plan gives the commissioner discretion to consider the impact on mixed stocks before allowing commercial harvest of surplus pink salmon. This proposal is simply asking for additional commercial fishing opportunities to harvest sockeye and silver salmon stocks which are already fully allocated. Pink salmon have little to no value and alone provide very little incentive for harvest unless additional salmon species are harvested as well.

Proposal 145

Seeks to allow additional opportunity to harvest pink salmon in Upper Cook Inlet on even years regardless of late run Kenai River King Salmon escapement numbers.

Oppose

Reference comments on proposal 144

Proposal 146

Seeks to align date prohibiting anglers from filleting king salmon before offloading boat or leaving site of catch to the end of King salmon season. Currently regs only require this through July 14th, this would change that date to July 31st.

Support

ADF&G housekeeping.

Proposal 147

Reduce the annual king salmon limit on Kenai River to one fish > 34 inches per year if retention is permitted. It currently is a 2 fish per year limit of any size.

Oppose

We are hesitant to forego the potential annual limit of two fish, particularly if future returns meet escapement goals. There are concerns regarding the modification of King Salmon plan allocation metrics, which could potentially result in increased commercial fishing opportunity. One more time…we are OPPOSED to any new opportunity below the current OEG.

Proposal 148

Seeks to close the Kenai River to fishing from a power boat Wednesdays and Fridays.

Oppose

There is no biological, social or otherwise justification for this proposal.

Proposal 149

Seeks to require mandatory retention of King Salmon.

Oppose

We support conservation of King Salmon stocks during times of low abundance and do not support mandatory retention of any species.

Proposal 150

Seeks to create Kasilof River Late-Run King Salmon Management Plan.

Support

We endorse this initiative, considering it is long overdue. The Kasilof should have the same protections that are currently in place on the Kenai as both systems are genetically unique.

Proposal 151

Seeks to expand non-motorized areas on the Kenai River by adding Thursdays and extending through August from Warren Ames Bridge to the outlet of Skilak Lake.

Oppose

We fail to see the necessity in expanding non-motorized areas or adding days, as it would only lead to increased crowding on other days of the week. This proposal does not address any biological concerns, and it's important to note that drift boaters (non-motorized) can be equally, if not more, effective than power boats. Additionally, the use of drift boats may involve excessive anchoring, potentially raising habitat concerns and further complicating and congesting an already orderly fishery.

Proposal 152

Seeks to prohibit motorized vessels on the Kenai River. Drift only.

Oppose

There is no perceived need to prohibit motorized vessels on the Kenai River, and this matter falls outside the board's purview.

Proposal 153

Seeks to allow guided fishing on the Kenai River Sunday and Monday from a boat.

Support as Amended*

We support allowing guided anglers the opportunity to fish for resident species on Sundays and Mondays "when fishing on the Kenai River for King Salmon is closed." This has the potential to provide more flexibility and spread out the bank fishery during these days. This adjustment would offer more opportunities for guided anglers to fish for resident species and contribute to a more balance use of resources.

Proposal 154

Seeks to remove day and hour restrictions on the Kenai River if closed to King Salmon.

Support

Reference comments from proposal 153

Proposal 155

Seeks to allow sportfish guiding on Kenai River Sundays and Mondays if closed to King Salmon.

Support

Reference comments from Proposal 153

Proposal 156

Seeks to allow sportfish guiding on drift only Mondays

Oppose

Oppose as written, reference comments from proposal 153

Proposal 157

Seeks to allow sport fishing for salmon from a boat on Mondays in August and September on the Kenai River.

Oppose

We do not seek to increase pressure on Kenai River Coho Salmon without adequate stock assessments and escapement numbers.

Proposal 158

Seeks to allow sportfishing from a guide vessel on Sunday and Monday with no hour restrictions May, June, and July above the Moose River.

Oppose

Reference comments from proposal 153 and 162

Proposal 159

Seeks to allow sport fishing from a guide vessel on the Kenai River on Mondays August 1-November 30.

Oppose

Reference comments from proposal 157.

Proposal 160

Seeks to prohibit sportfish guiding on Sunday May 1 – July 31st and any Monday in July. Additionally seeks to limit guide hours from 6am- 6pm May 1st-July 31st every day.

Oppose

Shortening hours and days could potentially lead to more crowding and increased competition for bank access. Furthermore, removing guided trout and sockeye boat anglers might add competition to sockeye gravel bars. These changes would disrupt an already well-established and orderly fishery.

Proposal 161

Restrict guided shoreline anglers on the Kenai River from 6am to 6pm July 1st- Aug. 15th from the outlet of Skilak Lake to mouth of river.

Oppose

This is already an orderly and well-regulated fishery on the Kenai River. Implementing the proposed restrictions would unnecessarily limit the timeframe available for anglers, inevitably causing crowding on the river banks, especially when public anglers come to fish. This heightened congestion not only jeopardizes the overall angling experience but also raises safety concerns. Additionally, such restrictions could create unfair circumstances for lodges situated on private property. Considering that a significant portion of the Lower Kenai River consists of private property, it is crucial to reevaluate these proposed measures to ensure they do not disproportionately impact the orderly nature of our fishery and the livelihoods of those operating on private land.

Proposal 162

Seeks to allow guiding on the Kenai River prior to 6:00 a.m. and after 6:00 p.m.

Support As Amended*

<u>“We only support implementation of this proposal when fishing on the Kenai River is closed to King Salmon.”</u>

This proposal not only aligns with the community's desire to diversify away from King Salmon but also addresses the need for a more even distribution of guides along the river. The opportunity for anglers to enjoy the river during quieter hours to fish for resident species, enhances the overall angling experience for everyone.

Reference comments from proposal 153

Proposal 163

Seeks to reduce the time guided boats are allowed to fish from anchor and apparently hours they are allowed to fish. The proposal is poorly written so difficult to understand.

Oppose

The implementation of a start time for the Kasilof River, given its one-way fishery nature, raises significant concerns that may ultimately compromise the current orderly and well-regulated fishing environment. Introducing a start time has the potential to create chaos at the boat launch, disrupting the organized flow of angler activities. Moreover, it is anticipated that such a measure would lead to extensive backups at the takeout point, negatively impacting the overall experience on the Kasilof River. It appears that this proposed solution may inadvertently generate multiple problems in an attempt to address a perceived problem. It is crucial to carefully reconsider the potential consequences of introducing a start time to ensure that it enhances rather than hinders the existing order and enjoyment of the fishery.

Proposal 164

Seeks to limit sport fish guiding in the Kasilof River as follows:

From May 1 to August 31, guided sport fishing in Kasilof River waters downstream from Tustumena Lake is permitted only from 6:00 a.m. to 6:00 p.m.

Oppose

Reference comments from proposal 161 and 163.

Proposal 165

Seeks to allow sport fishing on the Kenai River with one, unbaited, single hook or artificial lure from Jan 1st – July 31st from Bings landing to mouth unless allowed more by EO. From Bing's landing to outlet of Skilak no bait year-round except allow 2 artificial flies with combined gap of ½ inch.

Oppose

Difficult to enforce and can result in injured fish intended to be released, not needed.

Proposal 166

Seeks to expand time and area waters of the Kenai River are limited to only one unbaited, single- hook, artificial lure and redefine "artificial fly."

Oppose as written

Amended language submitted in RC*

Proposal 167

Seeks to Expand the time and waters of one single unbaited hook or artificial lure to Jan. 1st- Dec. 31st from 100 yards below Moose River to outlet of Skilak Lake.

Neutral

The guiding industry exhibits diverse opinions on the proposed changes. Those favoring bait use for Coho Salmon argue against a permanent bait ban, suggesting a reduction in bag limits in September from 3 Coho to 2 as a more conservation-minded approach, rather than just moving all the bait users to the lower Kenai. Conversely, supporters of the bait ban believe it's necessary to protect the trout population from the impacts of bobber egg fishing and to potentially aid in conserving diminishing Coho Salmon stocks by redirecting bait usage downstream on the lower Kenai. Moreover, this idea is believed to alleviate some congestion between Skilak and Bings Landing.

Proposal 168

Seeks to allow anglers to use 2 artificial flies in tandem when fishing on the Kenai River with a less combined gap of 3/8 inches.

Oppose

Reference comments from proposal 165

Proposal 169

Seeks to change the definition of "bag limit" for sockeye salmon in the Kenai and Kasilof Rivers as follows: Allow for hook & hand in the sockeye fishery on both the Kenai & Kasilof Rivers, and the limit applies to the angler who lands the fish not who hooked the fish.

Oppose

We support status quo, no need for "hook and hand."

Proposal 170

Seeks to allow backtrolling in a section of the Kenai River as follows:

Repealed [FROM JULY 1 - JULY 31, IN THAT PORTION OF THE KENAI RIVER FROM AN ADF&G REGULATORY MARKER LOCATED AT APPROXIMATELY RIVER MILE 11 UPSTREAM TO AN ADF&G REGULATORY MARKER LOCATED AT APPROXIMATELY RIVER MILE 12, A PERSON MAY NOT SPORT FISH FOR ANY SPECIES OF FISH FROM A VESSEL THAT IS MAKING UPSTREAM PROGRESS RELATIVE TO THE WATER WITH THE AID OF A MOTOR]

Oppose

This area was created by the board in response to a desire for a traditional fishing method “drift fishing.”

Proposal 171

Seeks to allow anglers to fish downstream of the Soldotna Bridge after taking a limit of coho salmon as follows:

Oppose

We anticipate that this may result in the adoption of catch-and-release practices for Coho Salmon. At present, once you've reached the limit for Coho Salmon, your fishing day concludes. This proposal aims to allow ongoing fishing for resident species, along with implementing catch-and-release for Coho Salmon. Coho Salmon have a higher catch-and-release mortality rate than other species, we are hesitant to endorse this new opportunity and prefer the current approach.

Proposal 172

Seeks to allow fishing from a vessel after retention of a limit of coho salmon on the Kenai River as follows: Allow fishing from a vessel after retention of limit of coho on the Kenai River below the Moose River.

Took no action based on 171

Proposal 173

Seeks to modify the regulations for the Kenai River August coho salmon fishery as follows: If king salmon season falls under one of the following categories at the end of July 31st, then the following actions will take place during August.

**King salmon fishing is open, and retention is allowed: bait will open August 1st.*

**King salmon fishing is open to catch and release: bait will be restricted until August 7th below the Soldotna bridge with a single hook and only fished from an anchored boat or from shore. Additionally, bait will be restricted till August 15th above the Soldotna bridge with a single hook and only fished from an anchored boat or from shore.*

**King salmon fishing is closed: restrict bait till August 15th from Skilak Lake down to Warren Ames bridge with a single hook and may only be fished from an anchored boat or from shore.*

Support

The proposal ensures a systematic and predictable implementation of bait openers in the coho fishery while recognizing conservative management actions aimed at protecting Kenai King Salmon.

Proposal 174

Seeks to regulate the use of bait in Kenai River in August as follows: If the Kenai River late run of King salmon is open to harvest or restricted to Catch & release on the 31st of July when the season closes then the Kenai River coho fishery will open with use of bait on August 1st. If the King salmon sport fishery is closed at season end on July 31, then bait will be restricted in the coho salmon fishery thru august 7 and open for use on bait on August 8th.

Took no action based on 173

Proposal 175

Seeks to reduce the coho salmon limits in the Kenai River to two fish after August 30

Took no action based on 176

Proposal 176

Seeks to reduce the coho salmon limit on Kenai River after September 1st. Reduce Coho limit from 3 to 2 on the Kenai River after September 1st.

Support as amended*

This proposal seeks to reduce the Coho Salmon limit river wide after September 1st. "We support reducing to two fish above the Soldotna Bridge beginning on September 1st." This proposal will serve to decrease pressure above Bings Landing. Retaining the 3 fish limit below the Soldotna bridge is justified as this is largely a migratory and a passthrough fishery for Coho, moreover the lower Kenai River has a large percentage of public participation and this retains their ability to retain a 3 fish limit.

Proposal 177

Seeks to modify the Kenai River coho salmon season and bag limits.

Took no action based on 176

Proposal 178

Seeks to reduce the season for the Kenai River coho salmon sport fishery.

Oppose

Reference comments from proposal 176

Proposal 179

Seeks to close additional waters to sport fishing in the upper Kenai River.

Neutral

While we wouldn't support fishing on any spawning species, this area is already **closed** for fishing for Coho Salmon, therefore we see this as an enforcement issue.

Proposal 180

Seeks to close waters of the Kenai River from the Sterling Highway Bridge to Kenai Lake to sport fishing

Took no action based on 181

Proposal 181

Seeks to close waters of the Kenai River to sport fishing from January 1 – June 10 as follows: Section 5 AAC 57.121 … (2) the following waters are closed to sportfishing as follows; (K) from January [MAY] 1 – June 10, in that portion of the Kenai River from an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake

Oppose

Current regulations are sufficient.

Proposal 182

Seeks to prohibit nonresident anglers from sport fishing on the Kenai River, as follows: Fish on the Kenai River will be for residents only, until there is a significant rebound in the king salmon runs. In times of shortage, the non-resident will be restricted first.

Oppose

We **do not** support limiting nonresidents from fishing on the Kenai River and question whether this is constitutional.

Proposal 183

Seeks to allow the department to take action sooner to harvest surplus in Russian River sockeye salmon runs as follows: 5 AAC 57.150 is amended to read: … (X) If the department is able to project the Russian River sockeye salmon escapement goal will be achieved the commissioner may, by emergency order, increase the bag and possession limit.

Oppose

We do not endorse the idea of over escapement. The department already has the tools to liberalize portions downstream of the Russian River in order to target Russian River stocks. Current indices used to estimate run strength and restrict or liberalize are sufficient to manage this fishery.

Proposal 184

Seeks to move 3-mile boundary marker to Old Kasilof Landing (river mile 4) as follows: 5 AAC 56.122(a)(8)(B) is amended to read: … (8)(B)(v) from January 1 — July 31, a motor may be used only between the mouth of the Kasilof River and an ADF&G regulatory marker located approximately [three miles] four miles upstream near Old Kasilof Landing, and only after fishing from the vessel has ceased for the day; a person may not deploy sport fishing gear from a vessel after a motor has been used to propel that vessel on the same day.

Support

ADF&G Housekeeping.

Proposal 185

Seeks to allow only unbaited, single-hook artificial lures in the Kasilof River as follows: Single hook and no bait from January 1st to June 30th from the upstream Tustamena boat launch down to the Sterling Highway bridge.

Support

We don't endorse a catch and release only fishery with bait.

Proposal 186

Seeks to update the stocked lakes list for the Kenai Peninsula Area.

Support

ADF&G Housekeeping.

Proposal 187

Seeks to remove the effective date of regulation pertaining to sport fishing from a motor driven boat

Support

ADF&G Housekeeping

Proposal 188

Seeks to prohibit bait and multiple hooks in Hidden Lake as follows: Hidden Lake is single hook no bait January 1st - December 31st

Support

Advocating for a no bait approach reflects our commitment to protecting lake trout and fostering the growth of larger fish, particularly in light of the increased pressure on the lake. This conservation-minded strategy seeks to preserve the health of the ecosystem and contribute to the sustainable management of the lake trout population with the hopes of growing trophy sized fish.

Proposal 189

Seeks to require personal use (dipnet) guides to adhere to sportfish guide regulations, fees, etc.

Support

Personal Use guides should be subject to the same regulatory requirements as sportfish guides. Helps protect the general public against unregistered, unlicensed, uninsured and unprofessional operators.

Proposal 190

Seeks to require personal use (dipnet) guides to adhere to sportfish guide regulations, fees, etc. Makes sure all PU guides are residents.

Support

Reference comments from proposal 189

Proposal 191

Seeks to reduce annual limits in the Cook Inlet PU fisheries

Oppose

No biological need for the reduction.

Proposal 192

Seeks to close Cook Inlet personal use fisheries when Central District commercial fisheries are restricted.

Oppose

Reference comments from proposal 191

Proposal 193

Seeks to require king salmon intended to be released in the PU fishery not be removed from the water.

Support

Not removing fish intended to be released is best practice.

Proposal 194

Seeks to allow retention of up to 15 Dolly Varden in the Upper Cook Inlet dipnet fisheries.

Oppose

Population estimates for Dolly Varden are unknown therefore additional harvest may threaten overall sustainability.

Proposal 195

Seeks to limit EO liberalization of the Upper Cook Inlet PU fishery to shore fishing only.

Oppose

Reference comments from proposal 191

Proposal 196

Seeks to prohibit fishing from an anchored vessel in the Upper Cook Inlet PU fishery.

Support

Anchoring a vessel in this congested fishery is a safety hazard.

Proposal 197

Seeks to prohibit retention of king salmon in the Upper Cook Inlet PU fishery.

Support with amendment*

We support adding the "Kasilof River" to the language of this proposal.

Because of the prolonged period of reduced king salmon abundance throughout Cook Inlet, it is not viable to sustain the retention of king salmon in the Upper Cook Inlet PU fisheries.

Proposal 198

Seeks to prohibit transportation of PU fish by motorized vessel upstream of Warren Ames Bridge on the lower Kenai River.

Oppose

The existing access along the lower Kenai River is insufficient to ensure proper access to the PU fishery near the mouth of the river. This limitation would hinder Kenai River property owners from reaching the PU fishery from their riverside properties, and enforcing such restrictions would pose challenges.

Proposal 199

Seeks to prohibit transportation of PU fish by motorized vessel on the Kasilof River upstream of a regulatory marker at RM3.

Oppose

Reference comments from proposal 198

Proposal 200

Seeks to close the Kasilof PU fishery when Kenai or Kasilof sport fisheries are closed to retention of (wild) king salmon during the early run.

Support

Opening the PU fishery in the presence of an already closed river sport fishery for king salmon is inappropriate. We commend the department for its decision to shut down this fishery for the entire 2023 season.

Proposal 201

Seeks to close the Kenai River PU fishery when the UCI Drift Fishery is restricted or closed.

Oppose

No biological need for the reduction.

Proposal 202

Seeks to reduce legal mesh size of a gillnet in the UCI PU fishery from 6 inches to 4 3/4 inches.

Oppose

We oppose Proposal 202 due to concerns about its potential impact. Specifically, reducing the legal mesh size of gillnets in the UCI PU fishery from 6 inches to 4 3/4 inches will result in indiscriminately catching various species, including large King Salmon. We are not aware of any evidence that points to smaller mesh sizes reducing mortality of King Salmon of all sizes. Large King Salmon are notorious for tangling in gillnets, rather than being caught with their gills. Reducing mesh size will not result in the reduction of the mortality of King Salmon of all sizes.

Proposal 203

Seeks to move regulatory marker for the Kasilof PU fishery.

Oppose

Current regulatory maker is sufficient.

Proposal 204

Seeks to allow hook and line as subsistence gear to take king salmon in the Yentna River subsistence salmon fishery.

Oppose

This fishery cannot support any additional exploitation of king salmon, the Yentna has struggled to meet escapement goals in the past several decades.

Proposal 205

Seeks to permanently close waters open to commercial fishing in the NDKSMP while Theodore, Lewis and Chuitna rivers remain closed and under stock of concern status rather than doing so annually by EO.

Support

Housekeeping

Proposal 206

Seeks to reduce the number of king salmon allowed to be harvested in the Northern District of UCI from 12,500 to 2,000.

Support

Current harvest caps were established in 1993 and do not reflect the significant reduction of king salmon stocks throughout UCI in recent years.

Proposal 207

Seeks to adopt additional restrictions in the NDKSMP to reduce the number of king salmon allowed to be commercially harvested in the ND of UCI so that harvest does not exceed 15% of the total combined commercial and sport harvest.

Support

Reference comments from proposal 206

Proposal 208

Seeks to close all commercial king salmon fisheries in ND when king salmon sport fishery is closed or restricted to catch and release in the Deshka, Susitna or Little Susitna.

Support

Burdon of conservation should be placed on all user groups.

Proposal 209

Seeks to close all commercial king fisheries in the ND

Support

Given the abundance of closures and restrictions to sport fisheries across the North District and given the number of rivers that are under stock of concern status for king salmon, no commercial fishery for king salmon in the ND of UCI is sustainable.

Proposal 210

Seeks to modify NDSMP and NDKSMP to further restrict commercial fishing based on escapement goals and in season abundance from established enumeration and weir projects in the Little Susitna River.

Support

Additional restrictions and more conservative season management actions are necessary to recover king salmon stocks across the ND of UCI.

Proposal 211

Seeks to repeal restrictive provisions in the NDSMP to allow additional set gillnets.

Oppose

Additional gear will result in unknown additional exploitation of king salmon stocks that are already struggling to meet escapement goals and many of which are under a stock of concern status.

Proposal 212

Seeks to adopt additional restrictions in the NDSMP by reducing the number of nets and allowable time to fish for the UCI ND set net fishery.

Support

Reference comments from proposal 210

Proposal 213

Seeks to adopt new "paired restrictive" management measures for the ND commercial set gillnet fishery by restricting permit holder to one net not more than 35 fathoms in length until run strength after Aug 1 is adequate to allow an extended opening of the Lower Susitna PU fishery.

Took No Action

Proposal 214

Seeks to adopt new "paired restrictive" management measures for the ND commercial set gillnet fishery through additional date and gear reductions.

Support

The current management measures fail to equitably distribute the conservation burden across all fisheries during the recent period of diminished king salmon abundance in both the ND and Cook Inlet areas.

Proposal 215

Seeks to provide additional commercial fishing opportunity for salmon in the NDSMP by adding an additional period.

Oppose

Reference comments from proposal 210

Proposal 216

Seeks to reduce annual commercial smelt guideline harvest levels in UCI from 200 tons to 100 tons.

Support

Precautionary approach to an unknown and understudied forage fish.

Proposal 217

Seeks to repeal (close) Cook Inlet Smelt Fishery Management Plan.

Support

We support closing the current Cook Inlet Commercial Smelt fishery due to its unknown impacts on king salmon stocks that have similar run timing.

Proposal 218

Seeks to allow harvest of king salmon between 20-24 inches in Unit 4 of the Susitna River Drainage Area.

Oppose

We do not support any additional harvest or opportunity for king salmon in UCI due to low abundance and stock of concern status for many ND rivers.

Proposal 219

Seeks to close fishing for all species within Unit 2 of the Susitna River Drainage Area when sport fishing for king salmon is closed.

Oppose

Closing all fisheries that are not directed toward King Salmon is overbearing and denies opportunity.

Proposal 220

Seeks to open an additional 800 yards of water in the south fork of Big River after July 20 until Sept 15.

Oppose

This area was closed at the last UCI BOF meeting and protects both staging sockeye and silver salmon. This area has been over exploited in the past and is necessary to protect staging and spawning sockeye and silver salmon returning to the South Fork of Big River on the west side of Cook Inlet. This system sees a significant amount of pressure from Kenai Peninsula and Anchorage based flight services further warranting the current closure and protections.

Proposal 221

Seeks to increase the sportfishing limit for coho on the Susitna River Unit 2 from two to three fish.

Oppose

Sufficient data does not exist to confirm adequate coho stock recovery drainage wide.

Proposal 222

Seeks to increase the sportfish limit for pink salmon on the Susitna drainage to allow retention of six pink salmon in addition to limit allowed for other salmon species.

Support

This regulation adjustment has worked well on the Kenai River.

Proposal 223

Seeks to add the Susitna River from Alexander Creek to Devils Canyon from Sept 15 to May 15 to the catch and release special management areas for rainbow trout.

Support

This protects resident species at times when they are vulnerable to over harvest.

Proposal 224

Seeks to extend the special management area on Willow Creek to above the Parks Highway.

Support

As written, the special management area for trout only protects resident species in the portion of Willow Creek below the Parks Highway. Much of the trout population resides in the portion of Willow Creek above the Parks Highway therefore current protections are inadequate.

Proposal 225

Seeks to open rainbow trout fishing in Unit 4 of the Susitna River drainage year-round with a bag limit of 5 fish.

Oppose

This would put excessive pressure on resident species and is not sustainable.

Proposal 226

Seeks to allow anglers to use two artificial lures (dropper flies) in tandem on Susitna Drainage.

Oppose

Difficult to enforce and can result in injured fish intended to be released, not needed.

Proposal 227

Seeks to remove the length restriction on Dolly Varden in Unit 4 of Susitna River.

Oppose

Unknown effect on spawning size (mature) Dolly Varden population, not warranted.

Proposal 228

Seeks to close dip netting in the vicinity of Anderson Creek between markers 300 ft downstream and 50 ft upstream from mouth of Anderson Creek.

Support

We support closures on vulnerable and staging stocks of coho salmon.

Proposal 229

Seeks to increase the number of days the Susitna dipnet fishery is open.

Oppose

This is a fragile fishery and current openings are understandably cautious.

Proposal 230

Seeks to increase the open season of the Susitna River dipnet fishery by adding two days a week from Aug 20-Sept 30.

Oppose

Current coho stocks cannot support this level of harvest.

Proposal 231

Seeks to modify dates of Susitna dip net fishery from July 10 - July 31 to July 17 - Aug 7.

Oppose

Reference comments from proposal 231

Proposal 232

Seeks to allow residents to purchase multiple sportfish licenses and fish multiple gear per license.

Oppose

This will have an unknown effect on increasing exploration of stocks, we recommend a cautious approach.

Proposal 233

Seeks to establish a sportfish derby approval process.

Oppose

We don’t believe the department has adequate stock assessments to implement this proposal.

Proposal 234

Seeks to clarify the boundary of Knik Arm Management Area and Palmer-Wasilla Zone and assist in the increased harvest of northern pike in certain flowing waters in the Palmer Wasilla Zone.

Support

This will clarify existing regulations and allow for additional harvest of northern pike populations.

Proposal 235

Seeks to reduce the size of the Palmer-Wasilla Zone.

Oppose

Do not support the added pressure on resident species during their spawn.

Proposal 236

Seeks to update stocked lakes list for Knik Arm drainage.

Support

Housekeeping for ADF&G

Proposal 237

Seeks to allow bow and spear as legal gear for northern pike and Alaska blackfish year rounds in Palmer Wasilla Zone.

Oppose

Unknown impact on spawning populations of rainbow trout.

Proposal 238

Seeks to establish a motor size restriction on the Susitna River.

Oppose

Wake is not always a function of motor or boat size.

Proposal 239

Seeks to establish a large fish king salmon goal on the Little Susitna River.

Support

The implementation of large king salmon goals has proven beneficial for the Kenai River, addressing historical challenges in accurately counting fish of various sizes. We believe extending this approach to the Little Susitna River would enhance the accuracy of King Salmon counts and contribute positively to its management.

Proposal 240

Seeks to increase the number of days bait is allowed in the little Susitna drainage.

Oppose

Unknown mortality on a mixed stock fishery with several stocks failing to consistently meet escapement goals.

Proposal 241

Seeks to allow bait in the Little Su any time commercial fishing is allowed within one statute mile of the terminus (mouth).

Opposed

We do not endorse commercial fishing within a one-mile radius of the river mouth, and we are against rationalizing commercial fishing activities based on the argument that fishing is already taking place within the river.

Proposal 242

Seeks to prohibit anglers from releasing coho salmon in the Little Susitna River.

Oppose

Do not support forcing people to keep fish.

Proposal 243

Seeks to increase the coho salmon limit from two to three fish in Knik Arm Drainages.

Oppose

Current coho stocks are not stable enough to warrant this increase in harvest.

Proposal 244

Seeks to clarify definition of mouth of Fish Creek.

Support

ADF&G Housekeeping.

Proposal 245

Seeks to increase days allowed to sportfish Fish Creek

Oppose

Increase opportunity is not warranted given current stock assessments and populations.

Proposal 246

Seeks to update list of lakes where anglers can use five lines while fishing for northern pike through the ice.

Support

ADF&G housekeeping

Proposal 247

Seeks to prohibit chumming in Big, Mirror and Flat Lakes.

Support

Abuse of no bait restrictions and chumming makes enforcement difficult.

Proposal 248

Seeks to restrict fishing for Arctic char in the Fish Creek Drainage to catch and release.

Support

Declining population warrants further protection.

Proposal 249

Seeks to remove the effective date of regulation to sport fishing from a motorized boat in Knik Arm Drainage.

Support

Clarifies existing regulations.

Proposal 250

Seeks to modify closure date for the Ship Creek king salmon fishery from July 13 to December 31.

Support

This is a put and take hatchery fishery with no implications for wild stocks and therefore increased opportunity is warranted.

Proposal 251

Seeks to modify Eklutna River drainage salmon bag and possession limits to close to fishing for coho and sockeye.

Neutral

(Not enough information.)

Proposal 252

Seeks to increase bag and possession for salmon other than king salmon in Turnagain Arm

Oppose

Department can liberalize if stocks rebound and are strong enough to support additional harvest.

Proposal 253

Seeks to allow use of two artificial flies in tandem on portion of Campbell Creek.

Oppose

Reference comments from proposal 226

Proposal 254

Seeks to add a portion of Chester Creek to Anchorage Bowl Special Management Area.

Support

Further protection for resident species is encouraged.

Proposal 255

Seeks to create a personal use dip net fishery for salmon in 20 Mile and Placer Rivers.

Oppose

These rivers have far too small and fragile salmon stocks to allow a personal use fishery.

For questions, contact us.

Kenai River Professional Guide Association

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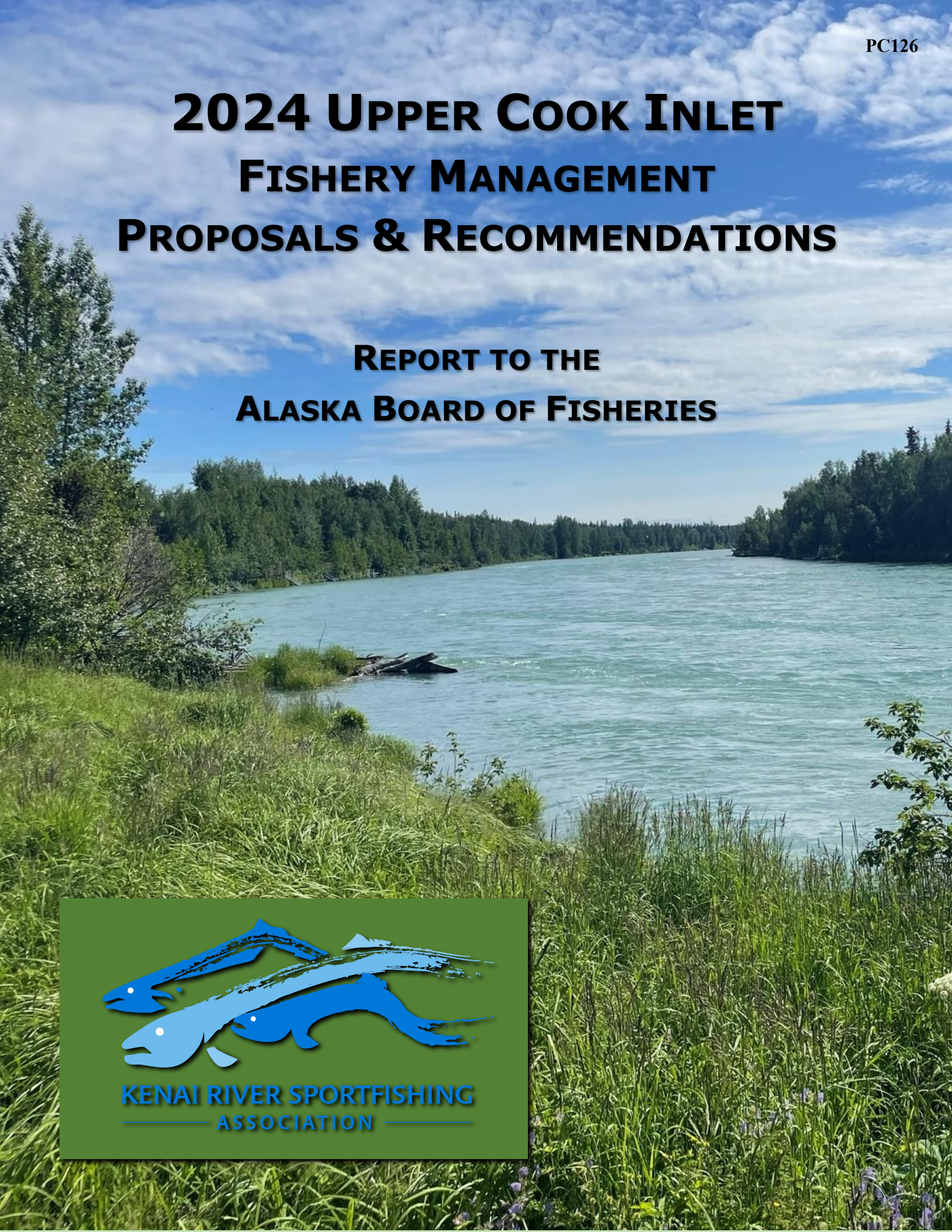
PC126

2024 Upper Cook Inlet Fishery Management Proposals & Recommendations

Report to the Alaska Board of Fisheries



Kenai River Sportfishing Association

Kenai River Sportfishing Association

The Kenai River Sportfishing Association (KRSA) is a professional 501(c)3 charitable nonprofit organization dedicated to ensuring the sustainability of the world's premier sportfishing river – the Kenai.

We are a nonpartisan fishery-conservation organization that works to ensure the long-term health and sustainability of fish resources in the Kenai River and elsewhere in Alaska, through advocacy of sport and personal-use fisheries and the promotion of science-based fish management.

We fund or create programs to protect and/or rehabilitate fish habitat; we fund research on the health of Alaska rivers and other fresh waters and fish populations; we fund or staff programs to educate children, the general public and our government/business leaders on fish and water conservation; and we advocate at the government level for sustainable and equitable fisheries management.

Since 1984, KRSA has been a leading advocate for fisheries conservation in Alaska, working diligently to ensure Alaskans' recreational fishing rights are protected and the fisheries are healthy for generations to come.

Summary & Recommendations

KRSA recommends that conservation & sustainability of the fish must come first in consideration of complex management tradeoffs among Upper Cook Inlet salmon fisheries

The Alaska Board of Fisheries will consider a total of approximately 186 proposals during the in-cycle meeting on Upper Cook Inlet finfish taking place in Anchorage from February 23 to March 7, 2024.

The salmon fisheries of the Upper Cook Inlet are mixed stock, mixed species in nature. This area is home to some of the most difficult and divisive management challenges in Alaska salmon fisheries. Management goals and strategies have been shaped by successive Boards of Fisheries based on decades of science and management experience. The goals of state management have been the sustainability of the stocks and the maximization of benefits.

Two extremely important issues, that, when viewed comprehensively, comprise almost 100 of the total proposals, are to be considered. The first is the obligation for the Board, in consultation with the Alaska Department of Fish and Game and the public, to develop and adopt a Conservation Action Plan for Late-Run Kenai River king salmon. The second is to react through regulation to a new and different fishery management strategy implemented by the federal government in the Exclusive Economic Zone waters of Upper Cook Inlet.

Three stocks of salmon and the regulatory management plans that govern their harvest drive the overall management of salmon in the Upper Cook Inlet. These three are Kenai River late-run king salmon, Kenai River late run sockeye salmon and Kasilof River sockeye salmon. In season implementation of these three management plans affects not only the three target stocks but results in various rates of exploitation for all other species and stocks of salmon returning to the rivers and stream of Upper Cook Inlet.

KRSA's overarching positions on these two issues can be simply stated. When it comes to adoption of a Conservation Action Plan for Kenai River Late-Run king salmon, the current management objective for escapement, the Optimal Escapement Goal of 15,000 large kings must stand. When it comes to allowing fishing opportunities in all fisheries, harvest of king salmon must be minimized and as selective as possible.

Regarding the EEZ, to the extent possible, the strategy found in the state regulation must prevail.

Clearly, nothing happens in a vacuum in this area. In addressing the two overarching issues the challenge will be to consider them comprehensively and, as a result, minimize unintended consequences that increase risks.

This report was prepared to support participation by the Kenai River Sportfishing Association in the 2024 meeting of the Alaska Board of Fisheries. This report reviews: 1) current challenges in upper Cook Inlet salmon fishery management; 2) key targets and tools which provide the foundation for salmon management plans and proposal, 3) proposals by KRSA to address current developments and evolving needs in Upper Cook Upper Inlet salmon management; and 4) KRSA positions on the full list of proposals under consideration by the Board.

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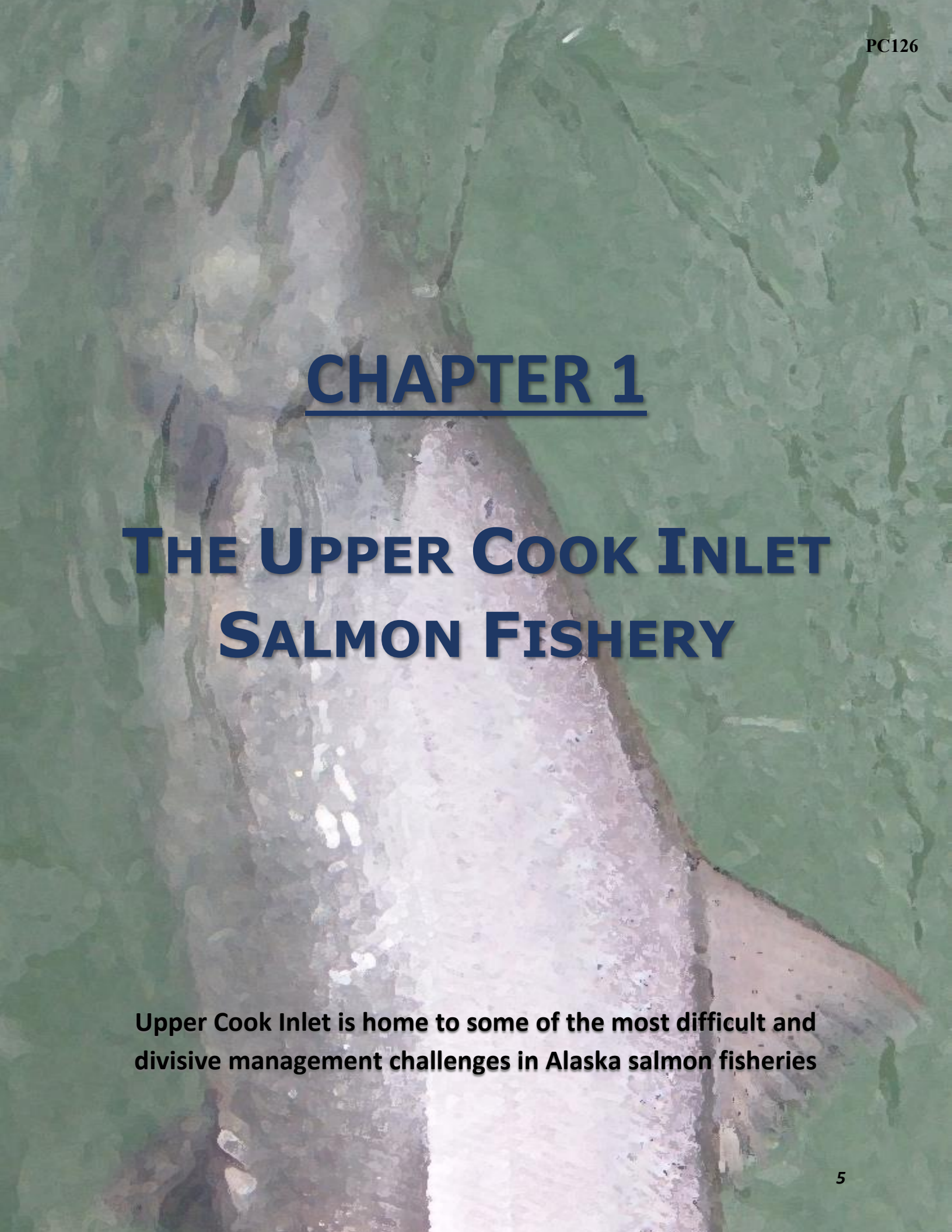


CHAPTER 1

THE UPPER COOK INLET SALMON FISHERY

Upper Cook Inlet is home to some of the most difficult and divisive management challenges in Alaska salmon fisheries

Ground Zero for Fishery Conflict

Competing fisheries and dynamic fish runs create a perfect stew for conflict in Upper Cook Inlet (UCI) salmon regulatory processes. Management must continually adapt to evolving needs, unforeseen developments and new information. To the Alaska Board of Fisheries (Board), falls the often-thankless job of crafting policies and plans to balance salmon sustainability and allocation.

Cook Inlet salmon were historically managed primarily for the benefit of commercial fisheries. Drift and set gillnet fisheries continue to account for the large majority of the harvest (Figure 1). The fishing power of the commercial fleet is tremendous and their harvest in marine waters of the central district comes at the front of the line. As a result, all other fisheries operate in the commercial fishery shadow.

The long dominance of commercial interests has increasingly collided with growing demand by sport and personal use fisheries over the years. Nearly two-thirds of the state's population now lives in the Cook Inlet area. This region now supports the largest public (non-commercial) fisheries in the state, whether measured by participation, harvest or economic value.

Alaska's dedication to sustainable, scientific management provides a solid biological foundation for Upper Cook Inlet salmon fisheries. However, management practices and priorities in Upper Cook Inlet have often struggled to anticipate and respond to changing needs and dynamic salmon fluctuations.

Balancing biological and allocation tradeoffs among many salmon species and runs across diverse fishery interests is a challenging and contentious process at best. Virtually every management decision has both biological and allocation implications. Decisions must also often be made with imperfect knowledge.

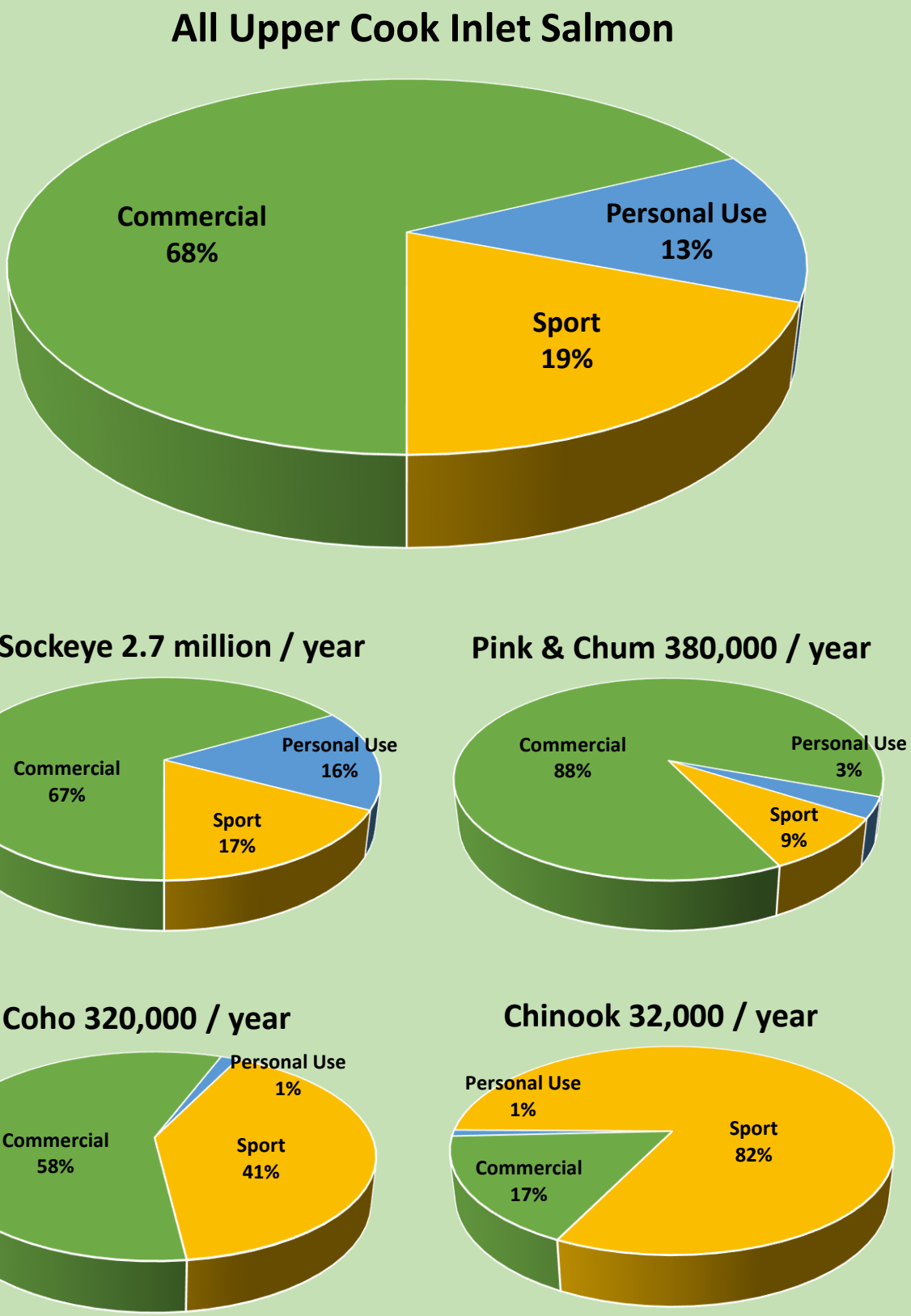


Figure 1. Harvest shares of salmon fishery harvest in Upper Cook Inlet, 2013-2022.

The Mixed Stock Conundrum

Mixed stock fisheries make it practically impossible to meet every escapement goal for each stock all the time

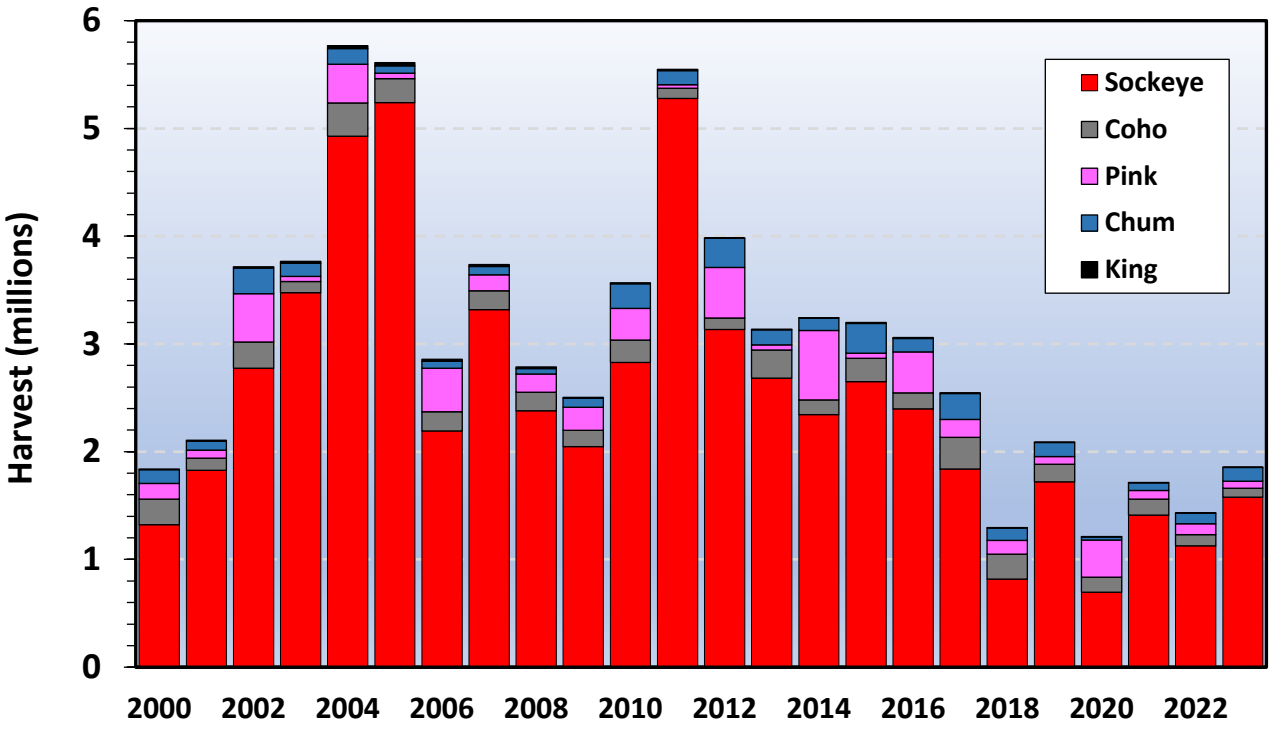


Figure 2. Annual salmon harvest in Upper Cook Inlet commercial fisheries, 2000-2023.

Which goals take priority when it is not possible to meet them all? This is a fundamental challenge in the management of Upper Cook Inlet salmon fisheries.

Escapement goals identify targets consistent with maximum or optimum sustained yield of individual stocks. However, Upper Cook Inlet commercial salmon fisheries harvest a mixture of salmon species and stocks with widely varying production patterns.

Productivity and the capacity to support harvest varies greatly from stock to stock due to differences in species life history and habitat potential. Salmon runs are also inherently dynamic in response to environmental variability and annual patterns which rarely align from species to species. Different fishery allocation priorities for different species add yet another layer of complexity to the mixed stock problem.

The Board of Fisheries adopted a Mixed Stock Policy [5 AAC 39.220] to help guide decisions where competing goals collide. This policy directs that:

"The burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern."

Kenai Sockeye - the 500-pound Gorilla

Upper Cook Inlet salmon fisheries were historically managed primarily to maximize commercial harvest of the abundant Kenai sockeye stock

Kenai sockeye dominate the total run and harvest (Figure 3). Large lakes in the Kenai system provide ideal rearing habitat and Kenai sockeye support some of the highest exploitation rates (70%+) of any wild salmon run in Alaska (Clark et al. 2007).

Large commercial sockeye harvests come at the expense of other species and stocks in the inlet. All other public fisheries depend on escapements through the commercial fisheries. Intensive commercial harvest in big run years for Kenai sockeye have a large impact on intermixed stocks including late-run Kenai kings, northern inlet coho, a weak Susitna sockeye stock, and the front end of the Kenai coho run.

Current management plans have largely moved beyond strong-stock management for Kenai sockeye to a more comprehensive strategy of optimizing returns for a complex of stocks and fisheries. However, competing demands between single and mixed stock management continue to underly ongoing tensions among salmon fisheries.

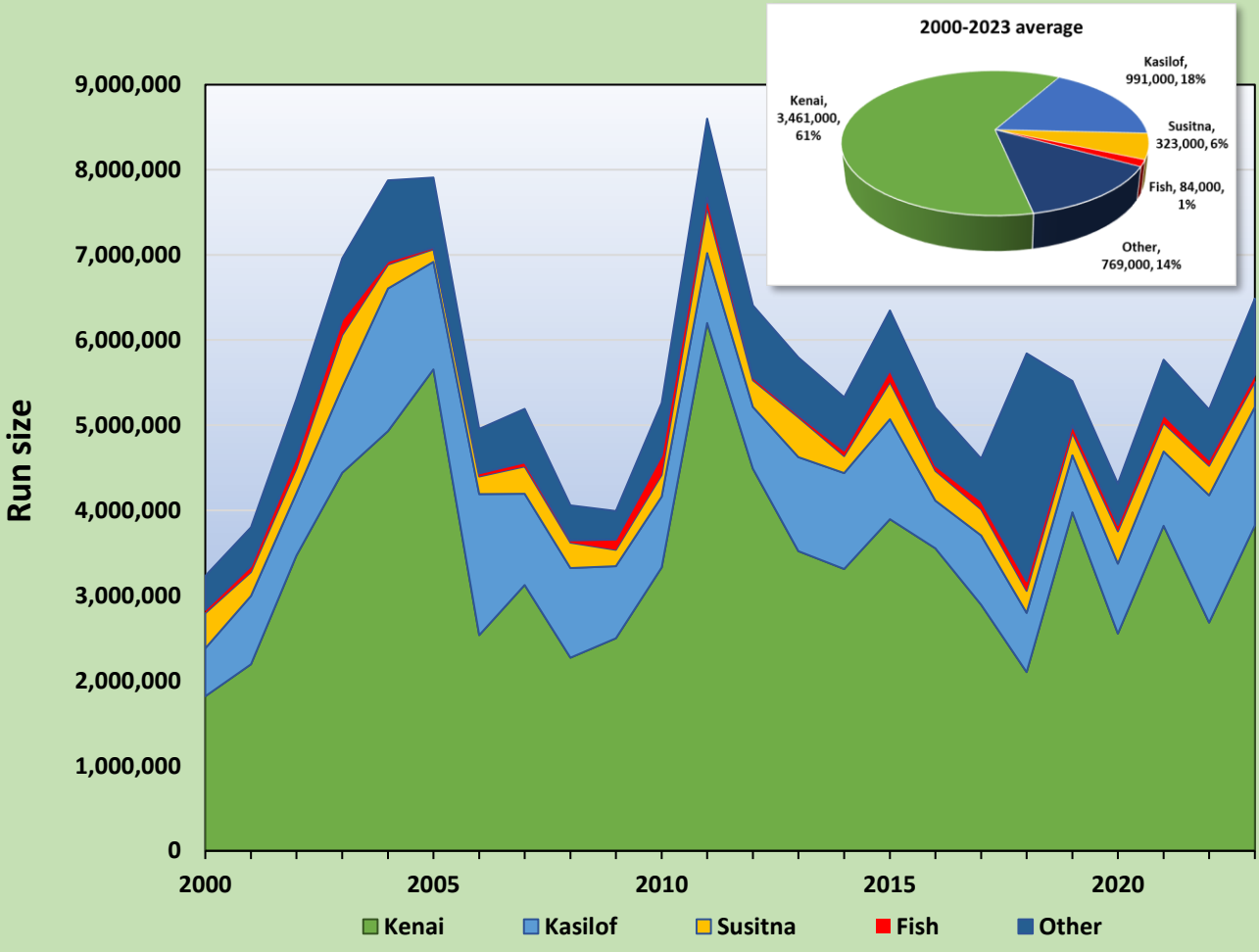


Figure 3. Historical run sizes of Upper Cook Inlet sockeye stocks.

A King Salmon Collapse

King salmon runs throughout Alaska have declined following a decade of unfavorable ocean conditions

Kenai late-run king numbers have fallen by 75% from historical averages (Figure 4). Even larger declines have been documented in the older age classes - numbers of 7-year-old kings have declined by 90% in the Kenai late-run.

The Board has now designated 18 king stocks-of-concern from Southeast Alaska to Norton Sound. Kenai late-run kings were designated as a stock-of-management-concern in October of 2023, based on failure to achieve established escapement goals in five consecutive years from 2019-2023.

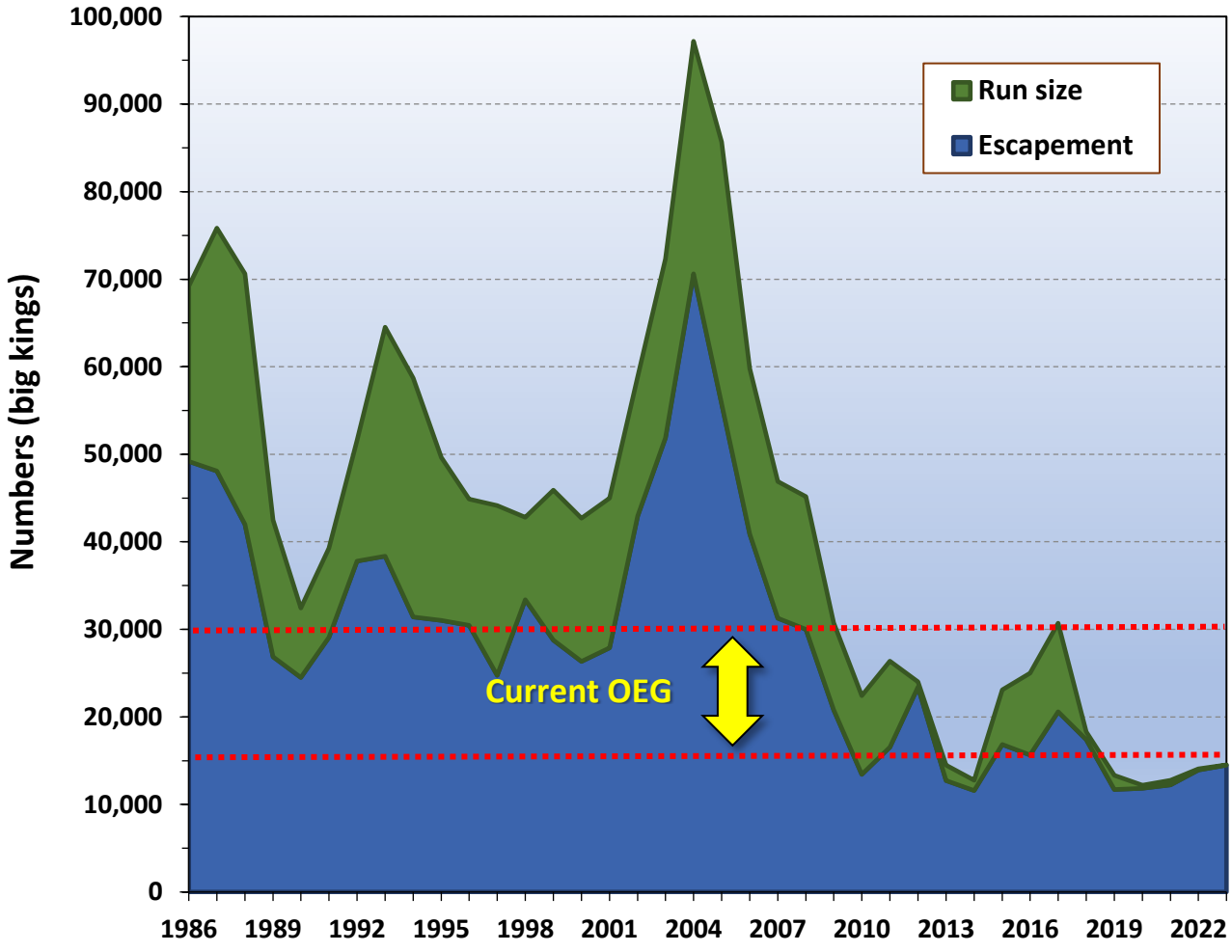


Figure 4. Run size and escapement of large late-run Kenai king salmon relative to the current OEG.

The Board will consider a stock-of-concern action plan for Kenai late-run kings in their 2024 Upper Cook Inlet meeting. A key question will be how much harvest is compatible with conservation and recovery goals at these critically-low numbers?

Drastic Measures

Fishery restrictions to protect kings have impacted vital components of the fishery economy and the local community

Historically low numbers of Kenai kings have required significant restrictions or closure of Kenai River sport and east-side setnet commercial fisheries which are the primary harvesters of kings.

Sport harvest of Kenai kings has been severely reduced since 2012 and practically eliminated since 2018 (Figure 5). In recent years, only very limited catch-and-release fisheries have been allowed. Loss of the early-run king fishery in June had a substantial impact on the community and related businesses. Losses have now extended to the late-run king fishery in July.

Recent commercial sockeye harvests are less than half of the long-term average (Figure 6). Restrictions have been particularly hard on the east-side setnet fishery. Sockeye far outnumber kings in the ESSN catch but king catches can be significant. Corresponding restrictions result in large foregone catch of sockeye.

The commercial drift gillnet fishery does not catch large numbers of kings. However, driftnet harvest has been reduced to protect northern inlet sockeye and coho, and uncharacteristically late run timing of sockeye in several years. A federal fishery disaster declaration for the 2018 and 2020 Upper Cook Inlet commercial salmon fisheries has allocated $9.4 million in funding to address losses with payments going to commercial fishers and processors.

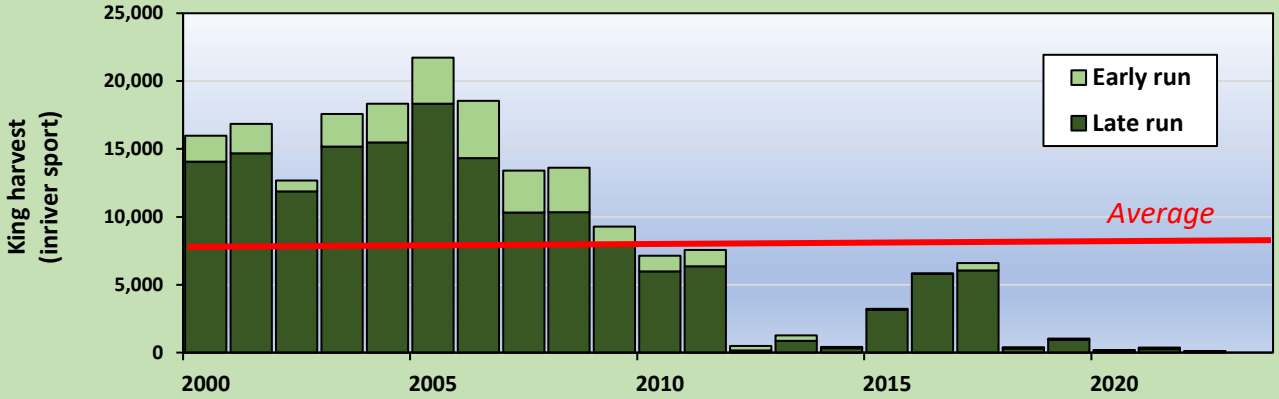


Figure 5. Kenai River king sport harvest (including hook and release mortalities), 2000-2023.

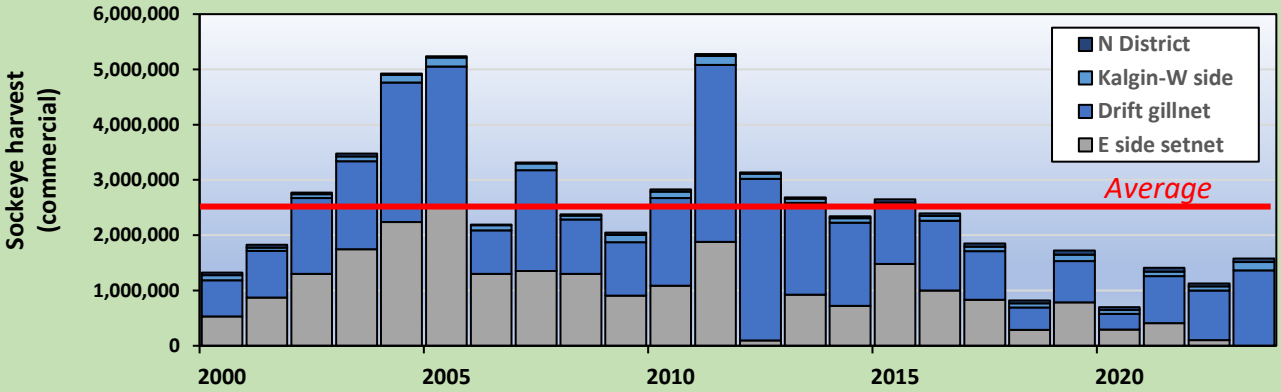


Figure 6. Upper Cook Inlet commercial fishery sockeye harvest by fishery, 2000-2023.

Personal Use – A Fishery Success Story

The UCI personal use fishery is the largest resident-only fishery in Alaska, and puts more fish in more freezers of Alaskans than any other state fishery

Tremendous growth in the Upper Cook Inlet personal use fisheries over the last two decades attests to the high value placed by Alaskans on the opportunity to harvest salmon for their tables in a family outdoor activity (Figure 7).

Five dip net fisheries occur in Upper Cook Inlet (Kasilof, Kenai, Beluga, and Susitna Rivers, and in Fish Creek). A gillnet PU fishery also occurs at the mouth of the Kasilof River. Over 20,000 household permits are now fished annually with a peak effort of 49,797 household-days in 2014.

Harvest opportunity in personal use fisheries depends on high and somewhat predictable fish daily counts. Because most of the Kenai and Kasilof participants are not local, participants typically require some lead time and planning to mobilize.

Figure 7. Personal use fishery harvest of sockeye in Upper Cook Inlet.

Mischief in Federal Waters

The Central District Drift Gillnet Management Plan needs to be revised due to a new federal management plan for salmon in portions of Cook Inlet

Federal management of salmon was historically so bad that it was a driving force in Alaska statehood. Authority for salmon management in federal waters outside 3 miles from shore, has long been delegated to the State of Alaska and its Board of Fisheries. The tremendous success of the state's salmon fisheries is a testament to the effectiveness of Alaska's management system.

Unhappy with their salmon allocation and fishery limitations to protect salmon stocks, the United Cook Inlet Drift Association (UCIDA) filed a lawsuit in 2013 against federal management authorities shopping for a more favorable venue in an attempt to increase their harvest share. This lawsuit against the National Marine Fisheries Service (NMFS) and the Secretary of Commerce, challenged approval of previous decisions by the North Pacific Fishery Management Council to remove federal waters in Cook Inlet from the scope of the federal salmon fishery management plan.

After prolonged litigation in the U.S. District and Appeals Courts, the National Marine Fisheries Service has now proposed amendments to its fishery management plan for salmon management in federal waters of Upper Cook Inlet. This includes an area of the center of Cook Inlet south of Kalgin Island (Figure 8).

The state's management of the drift gillnet fishery is governed primarily by a Central District Drift Gillnet Fishery Management Plan (5 AAC 21.353) which has been crafted by the Alaska Board of Fisheries over decades to ensure the sustainability of strong and weak salmon stocks, optimize yield and opportunity in the diverse fisheries, and allocate benefits among user groups.

Drift gillnetters are the most powerful gear group in Upper Cook Inlet and are capable of harvesting hundreds of thousands of salmon in a single day's opener. The proposed federal plan increases fishing time between July 16 and August 15 in federal waters relative to the state's management plan. The added fishing time will reduce the number of salmon reaching marine waters of the Northern District and rivers and streams throughout Upper Cook Inlet; overfish weak stocks of Susitna sockeye and northern inlet coho; reallocate salmon harvest from other users in favor of the commercial drift gillnet fishery; and confound in-season management which has been central to effective fishery management by the state.

KRSA strongly opposes Federal management of Alaska's salmon resources and supports continuing state management of the Upper Cook Inlet salmon fishery. KRSA also opposes specific fishery measures proposed by the National Marine Fisheries Service plan for the Cook Inlet EEZ. Failing that, KRSA recommends that the proposed rule be revised to align with the current state management plan for fisheries operating in Federal waters of Cook Inlet. Specifically, the drift gillnet fishery in the EEZ should be limited to one 12-hour fishing period per week between July 16 and August 15.

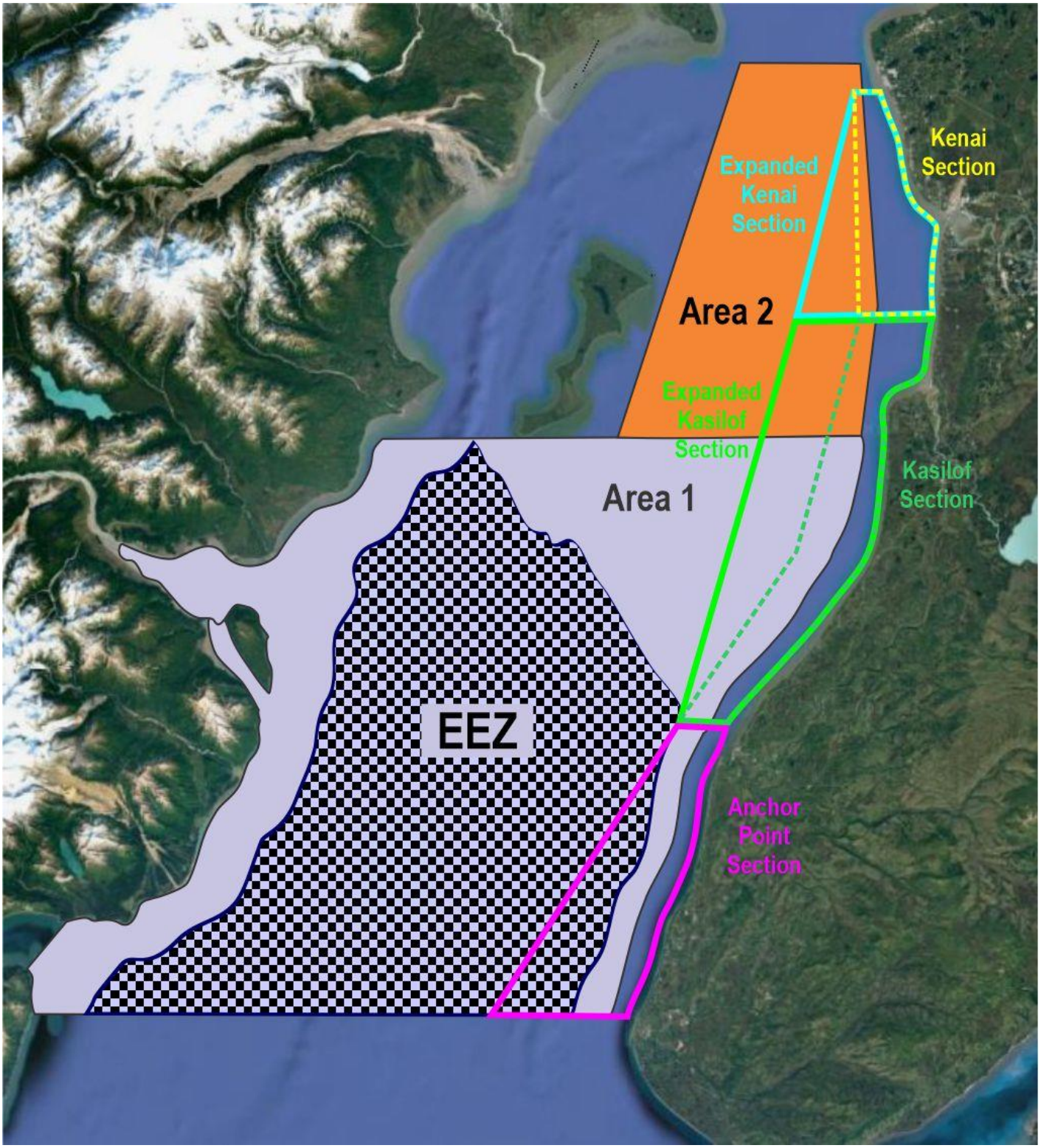
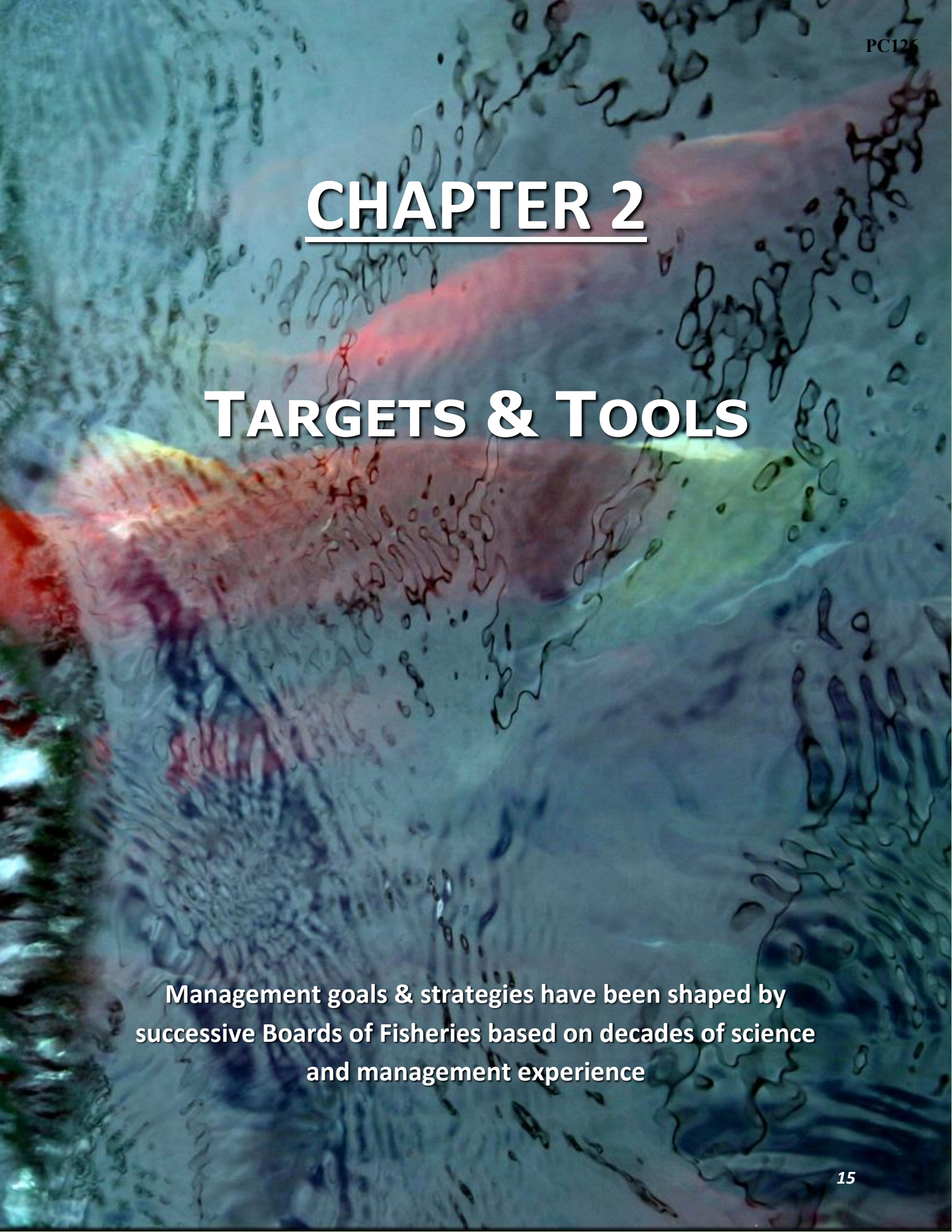


Figure 8. Commercial drift gillnet fishery areas of Upper Cook Inlet in relation to federal waters (approximate locations).



CHAPTER 2

Targets & Tools

Management goals & strategies have been shaped by successive Boards of Fisheries based on decades of science and management experience

Sockeye – Optimizing Value

Cook Inlet sockeye are now managed to optimize harvest within constraints identified for other species, stocks and fisheries

Biological (BEG), sustainable (SEG) and inriver escapement goals have been identified for Kenai, Kasilof and portions of the Susitna sockeye stocks. Fisheries are managed to achieve these goals to the extent that is possible given all the complexities of mixed species, stocks and fisheries in Upper Cook Inlet.

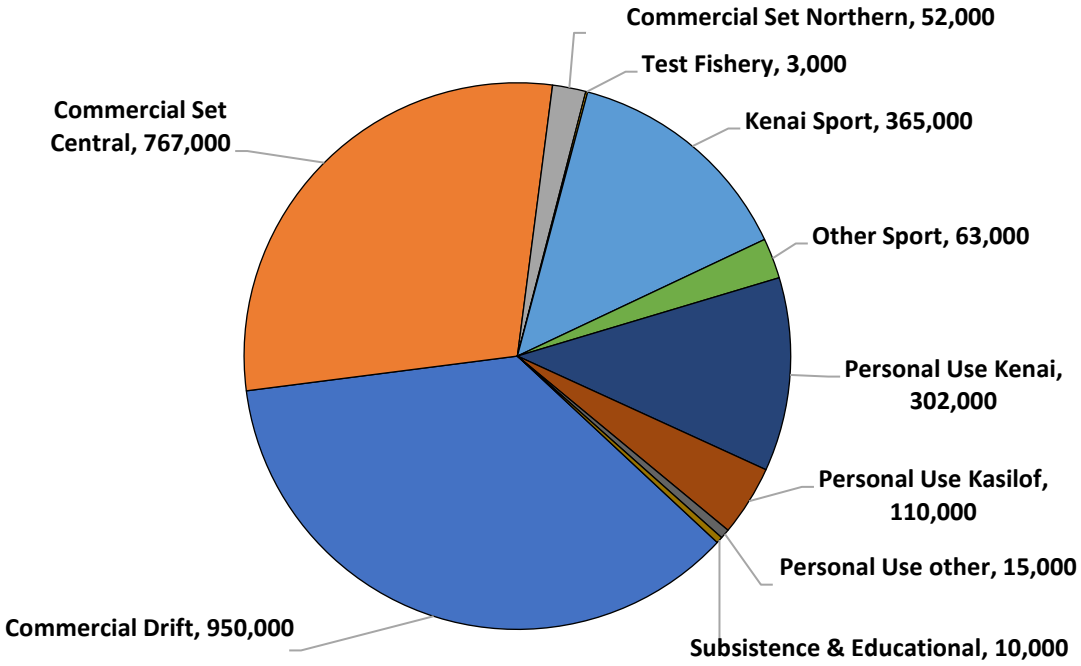


Figure 9. Recent average harvest of sockeye in Upper Cook Inlet salmon fisheries, 2012-2021.

Myth: "Overescapement" of sockeye depresses future returns.

Fact: Large escapements continue to produce large returns.

Large escapements over the last 20 years continue to produce average to large returns and also showed that previous goals were too low.

Predictions of poor returns from large escapements have long been used by commercial fishery proponents to justify intensive harvest of sockeye regardless of upstream effects. "Overescapement" of Cook Inlet sockeye has now proven to be a theoretical problem which is practically insignificant. It is a pseudo-biological argument for allocative strategies favoring commercial fisheries.

No Kenai sockeye escapement has ever failed to replace itself (Figure 10). Kasilof sockeye escapements have exceeded replacement in 44 of 45 years and every year since hatchery sockeye releases were discontinued (Figure 12). Brood-year interaction models. previously used by ADF&G to predict a severe impact on future recruitment have failed (Clark et al. 2007; Hasbrouck et al. 2022).

Kenai Sockeye

Sustainable Escapement Goal	750,000 – 1,300,000	
Inriver Goals (@ sonar)	Run < 2.3 million	1.0 – 1.2 million
	Run 2.3 – 4.6 million	1.1 – 1.4 million
	Run > 4.6 million	1.2 – 1.6 million

The SEG is based on historical stock-recruitment data (Figure 10) and has increased when data showed that maximum yield occurs at higher escapements than previously thought (Figure 11).

The Kenai sockeye management plan also identifies inriver goal ranges measured at the sonar. Inriver goals are designed to distribute escapement throughout the SEG range according to run size with allowances for sport harvest upstream from the sonar at river mile 19.

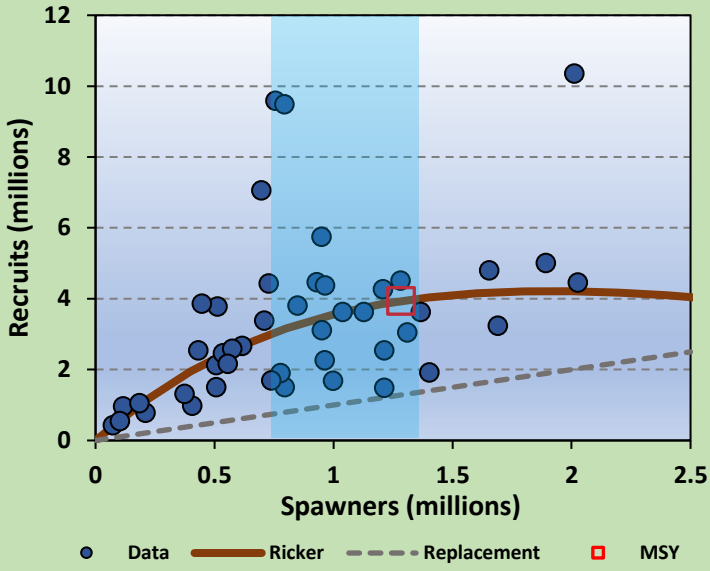


Figure 10. Stock-recruitment data for Kenai late-run sockeye in relation to SEG (Hasbrouck et al. (2022).

Escapements have always fluctuated around established goal ranges due to the inherent uncertainty in run forecasts and management complexities (Figure 11). Goals have been substantially exceeded in recent years due primarily to weak stock management constraints.

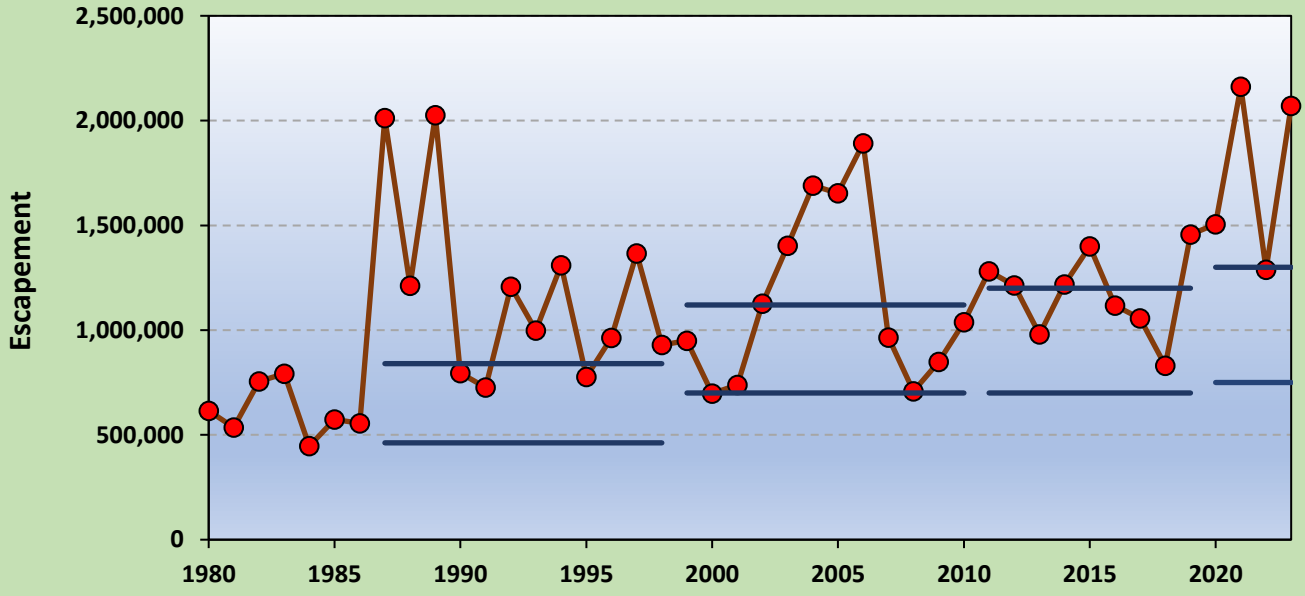


Figure 11. Historical escapement of Kenai late-run sockeye relative to goal ranges which have increased over time. (All numbers are in Didson sonar equivalents.)

Kasilof Sockeye

Biological Escapement Goal	**140,000 – 320,000**
Optimum Escapement Goal	**140,000 – 370,000**

The BEG is based on historical stock-recruitment data which identified escapements with the greatest potential for providing maximum sustained yield (Figure 12). An OEG was established by the Board of Fisheries to prioritize meeting minimum Kenai sockeye goals.

Goals have increased over the years as large escapements produced higher yields than previously estimated (Figure 13). Record high escapements in 2022-2023 accompanied large runs concurrent with fishery closures to protect kings.

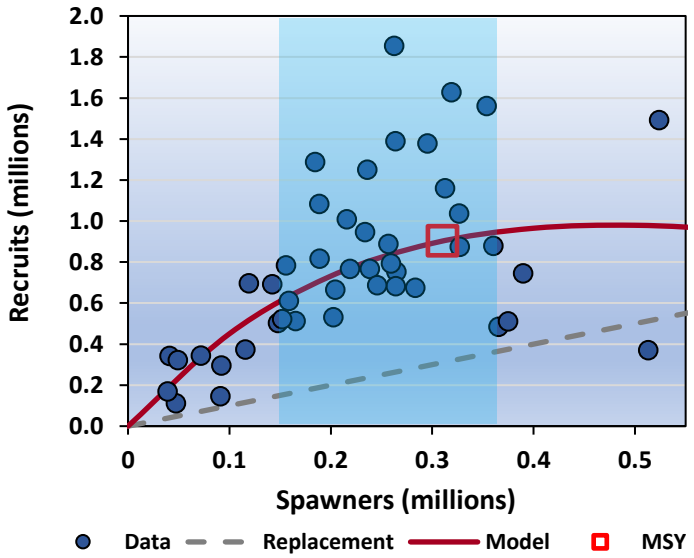


Figure 12. Stock-recruitment data for Kasilof sockeye in relation to OEG (McKinley et al. 2020).

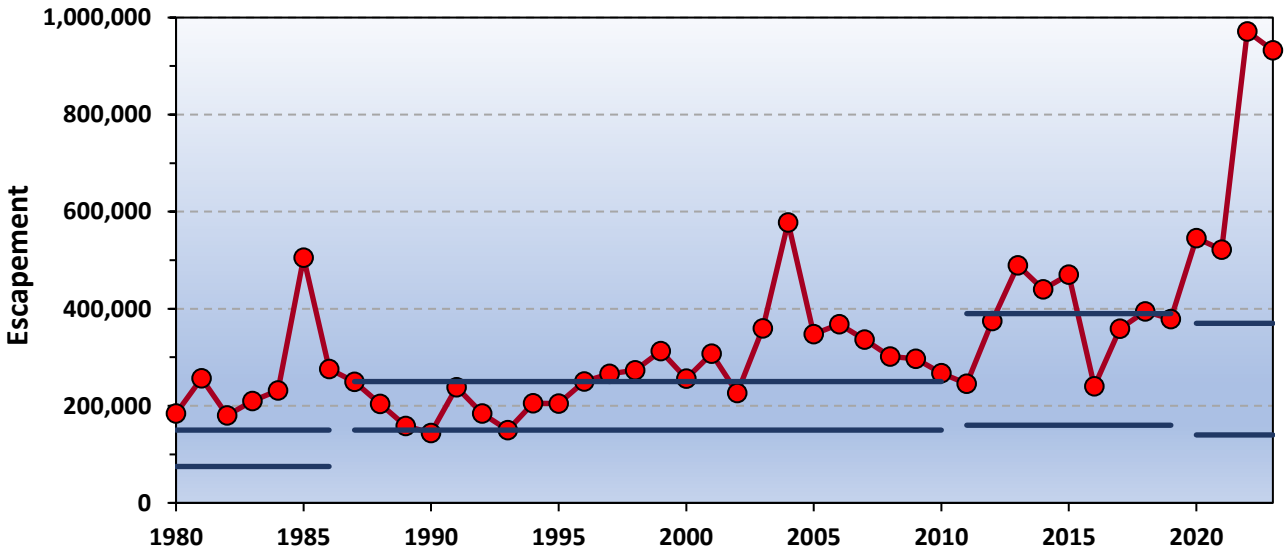


Figure 13. Historical escapement of Kasilof sockeye relative to goal ranges which have increased over time. (All numbers are in Didson sonar equivalents.)

Northern Cook Inlet Sockeye

Small and less-productive sockeye populations return to many lakes, rivers and sloughs in the Susitna drainage and other areas of northern Cook Inlet. SEGs are currently established for five populations (Chelatna, Judd, Larson, Fish and Packers). Yields of Susitna sockeye have declined substantially over time but established escapement goals are now generally being met or exceeded.

Kenai Kings – Balancing Conservation & Harvest

A precautionary Optimum Escapement Goal targets higher escapements for conservation of Kenai kings during critically low run years

Kenai Kings are managed for a precautionary Optimum Escapement Goal which is larger than the Sustainable Escapement Goal identified by ADF&G. Current data supports the higher OEG for Kenai late-run kings. Lower escapements do not produce significant yield as returns are all near or below replacement.

OEG:	**15,000 – 30,000 big fish**	**(adopted by 2020 Board of Fisheries)**
OEGs consider a balance of biological and allocative factors to optimize sustained yields in mixed stock fisheries by diverse groups of users		
SEG:	**13,500 – 27,000 big fish**	**(identified in 2017 by ADF&G)**
SEGs identify escapements that historically provided sustained yields. SEGs generally include escapement expected to produce Maximum Sustained Yield (although the exact point of MSY may be uncertain due to data limitations).		

Kenai king escapement goals are based on stock-recruitment analysis of historical data (Fleischman & Reimer 2017). This analysis looks at future returns of salmon of different ages from each brood year of escapement. For instance, Kenai kings return at ages three through seven.

Recent runs provide information on returns from low escapements which was not available when the previous analysis was completed. This data shows that the Ricker stock-recruitment model used to identify current goals, grossly overestimated yields from current low escapements (Figure 14). The Ricker model continues to perform poorly in the updated analysis with recent data.

Yield analyses provide a more accurate picture of productivity under the observed range of conditions. A Markov table analysis indicates that maximum sustained yield is produced at escapements around 30,000 rather than 18,000 as predicted by the faulty Ricker model.

Thus, the current SEG of 13,500 – 27,000 is not supported by recent data. Escapements in the low end of this range do not sustain significant yield which is definition for an SEG in the Sustainable Salmon Policy. The OEG adopted by the Board of Fisheries better matches the available data but an even greater goal range is supported by the available data.

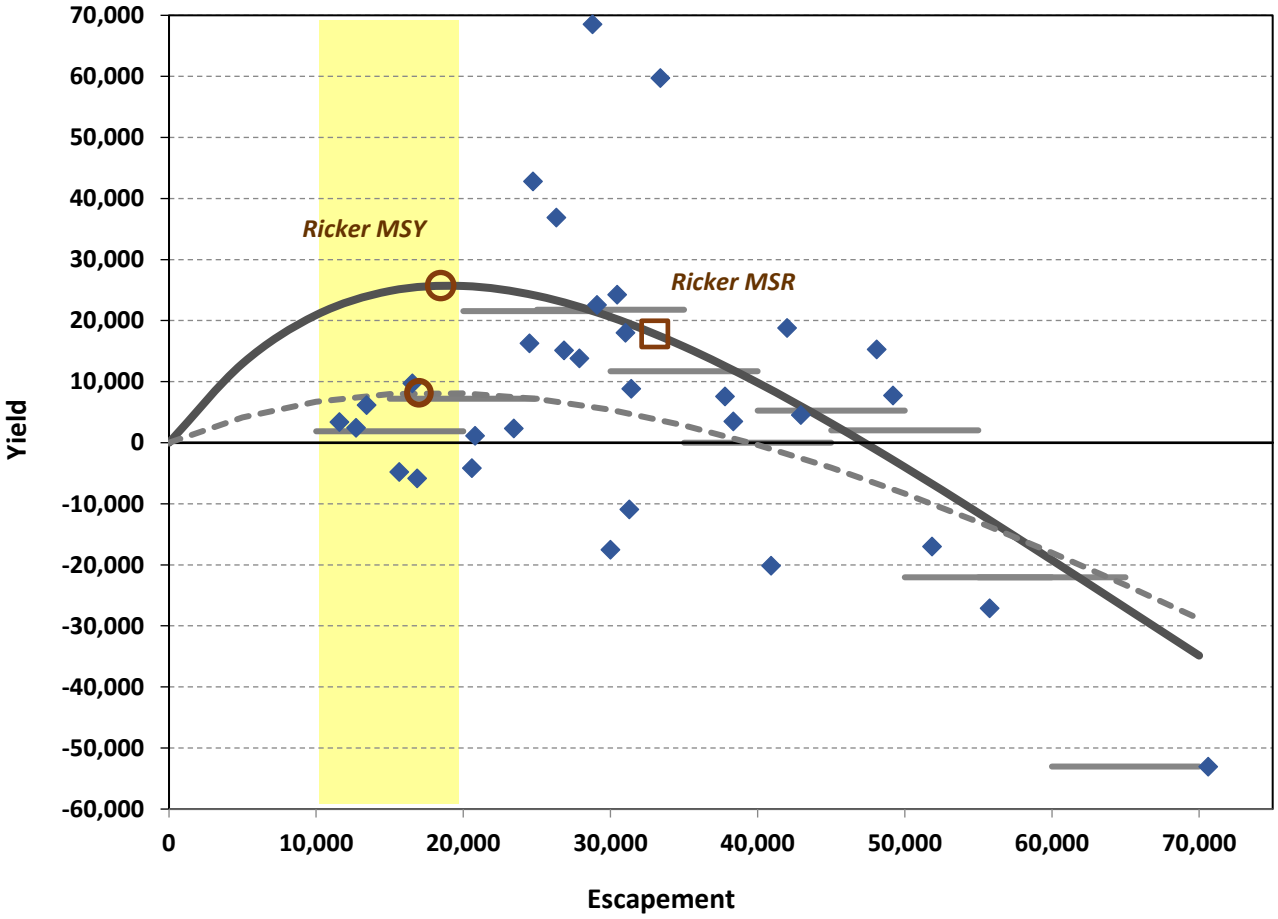


Figure 14. Yield analysis from stock recruitment data for Kenai Late-Run kings based on Ricker model and Markov table analyses. Zone of critical low escapements is highlighted.

The blue diamonds are the brood year yields (return minus escapement).
The solid green line is the Ricker curve fit for the current SEG (Fleischman & Reimer 2017).
The dashed line a curve fit to current data.
MSY and MSP points are identified with a circle and square, respectively.
The horizontal gray lines are Markov table fits showing actual yield patterns. Markov tables have been used by ADF&G for Kenai sockeye escapement goal analysis.
The yellow box highlights escapements in the 10,000 - 20,000 range where we have been living in recent years.

Why an OEG?

Fishery management is a shotgun, not a rifle

1. ***The OEG provides a precautionary safety factor to ensure that minimum escapement goals are achieved.***

   Managing for the minimum SEG will inevitably result in some escapements below the goal due to inherent uncertainty in forecasts and run timing. Managing for the higher OEG goal substantially reduces the risk of failure to meet the minimum goal.

When you are in a hole, stop digging

2. ***The OEG is insurance against further decline to critically low escapements which might damage long-term sustainability of this unique stock.***

   Management for minimal escapements will drive numbers even lower when offspring from poor brood years go into a sour ocean. Recent low escapements have produced returns at or below replacement which is why the king run continues to languish at record low levels. Continuing declines will risk conservation concerns where long-term population viability may be irreparably damaged.

The deeper the hole, the steeper the climb

3. ***The OEG will foster more-rapid rebuilding if and when more-favorable ocean conditions occur.***

   The best way out of the king disaster hole we are in is to provide sufficient escapements to capitalize on higher productivity when it occurs. Low escapements generally produce low future returns. Higher escapements generally produce higher returns when we are in a low run cycle like we are now. Delivering more fish to the spawning grounds now should return the investment several-fold in the future and provide more timely relief and return to normal fishing opportunities.

A lot of fish is good, more fish is better

4. ***The OEG produces greater sustained recruitment which delivers the greatest catch and value for the sport fishery for which kings are the priority.***

   Escapement goals based on MSY are appropriate for a commercial fishery because fishing power is high and the fishery can catch a high proportion of the run even at low run sizes. Goals based on Maximum Sustained Recruitment (MSR) are appropriate for a sport or personal use fisheries where the greatest catch and value occurs at the greatest average annual salmon abundance. MSR is produced by escapements greater than those which produce MSY.

Fishery Windows – Sharing the Bounty

Windows are scheduled closures in the set gillnet fishery designed to deliver fish to inriver fisheries & escapement

Windows are specified in both the Kenai and Kasilof sockeye salmon management plans, and are either floating at the discretion of the commercial fishery manager or fixed at the end of the week to feed personal use and sport fisheries during the weekend.

Windows of at least 36 hours (three tides) are generally needed to pass significant numbers of fish into the rivers. Shorter windows simply reload the beaches for the next commercial opener.

Before windows, extended periods of intensive commercial fishing across the peak of the sockeye run created large gaps in delivery of significant salmon numbers to Kenai peninsula rivers.

Windows now interrupt sustained periods of set net fishing along the east-side beaches. Periodic pulses of salmon provided by windows now provide regular opportunities in sport and personal use fisheries.

Windows also provide significant biological benefits by protecting escapement of stocks that are not monitored in-season (i.e. Kasilof late-run kings) and preserving the inherent genetic and life history diversity of stocks expressed throughout the duration of the run.

Myth: Windows don't work because of unpredictable sockeye movement patterns.

Fact: Windows deliver significant numbers of sockeye and kings to rivers during periods when salmon are moving through the inlet.

Windows are working exactly as intended in Upper Cook Inlet. While they cannot guarantee delivery of fish to the rivers when fish aren't moving, they do ensure significant pulses when fish are available.

Initial concerns that windows would increase the chances of missing unpredictable large pulses of fish and exceeding escapement goals, have not been realized. Due their inherent unpredictability, Kenai sockeye escapements have always been scattered around goals since long before the advent of windows. More recent large sockeye escapements are the result of king salmon constraints rather than window regulations.

Paired Restrictions – Sharing the Conservation Burden

Paired restrictions have proven critical in protecting king escapements during a prolonged period of low abundance

This regulation was first adopted by the 2014 Board of Fisheries to share the conservation burden for Kenai late-run king salmon among fisheries following a precipitous decline in abundance. Various modifications have been adopted by subsequent Boards.

Paired restrictions link a prescriptive series of stepdown measures in the Kenai River sport fishery and east-side set gillnet commercial fishery based on Kenai king abundance (Table 1). Set gillnet fishery restrictions are triggered by sport fishery regulations. Personal use and saltwater sport fishery restrictions are also connected.

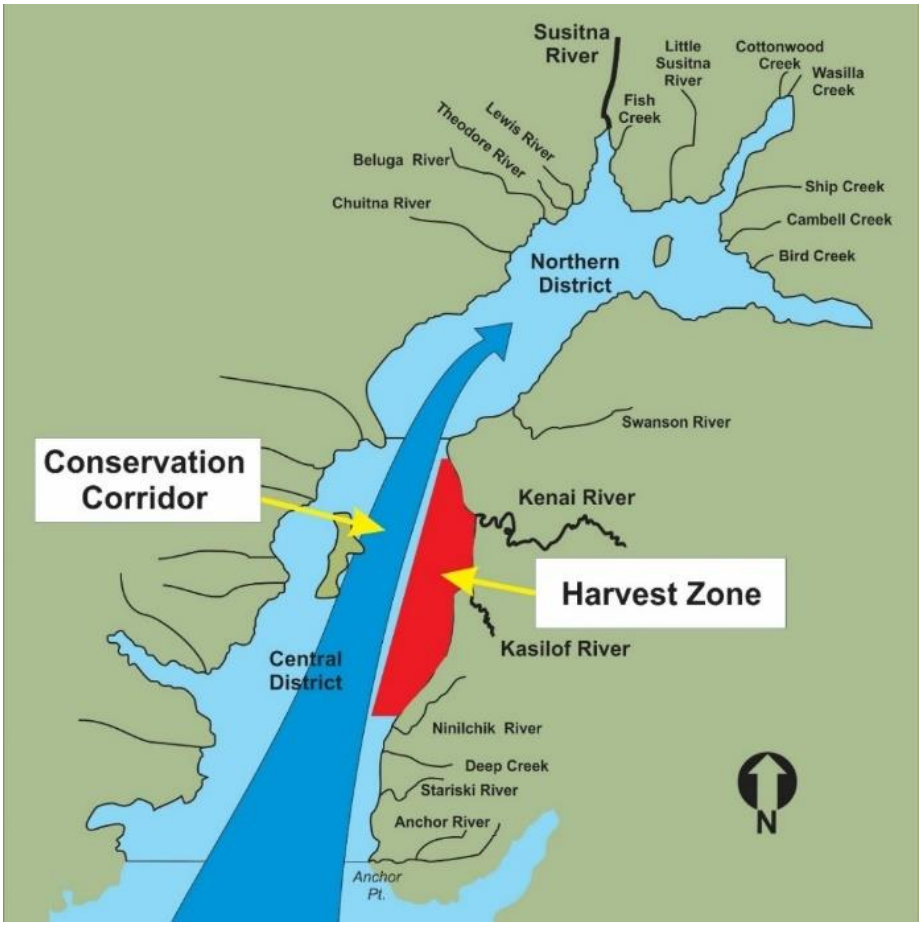
Prior to paired restrictions, the set gillnet fishery operated independent of the sport fishery based primarily on sockeye abundance. Management to avoid exceeding the upper end of sockeye escapement goals had the potential of trumping the need for restrictions to meet the lower end of the king escapement goals. Responsibility for the conservation burden fell disproportionately on the sport fishery.

Table 1. Matrix of stepdown measures under paired restrictions in the Kenai River Late-run king Salmon Management Plan [5 AAC 21.359]. Changes from higher tier are highlighted by underline.

	Kenai Sport Fishery	East-side Setnet Commercial
Normal	Season = July 1-31 Bait allowed, single hook Seasonal limit two per year	48-108 hr/wk based on sockeye abundance 4 deep (45 mesh) nets per permit Weekend no-fishing window (36 hours)
A	Use of bait prohibited (expected 50% reduction in potential harvest)	Up to 48 hr/wk Incentives for shallow (29 mesh) nets Reduced gear per permit Up to 36 hr/wk in August Weekend no-fishing window (36 hours)
B	Use of bait prohibited No retention of kings >34 inches	Up to 36 hr/wk Incentives for shallow (29 mesh) nets Reduced gear per permit Up to 36 hr/wk in August Weekend no-fishing window (36 hours)
C	Use of bait prohibited No retention of kings (catch & release only)	Up to 24 hr/wk Incentives for shallow (29 mesh) nets Reduced gear per permit Up to 36 hr/wk in August Weekend no-fishing window (36 hours)
D	No fishing for kings	Closed

The Conservation Corridor – A Pathway Home

Conservation corridor regulations are strategic time and area closures in the center of Cook Inlet to pass salmon northward



The Central District drift gillnet fishery is the most powerful and mobile of all commercial fisheries in Upper Cook Inlet and the primary harvester of north-bound salmon. Commercial interception of northern inlet sockeye and coho dwarfs harvest of these stocks in upstream sport, personal use and subsistence fisheries.

Susitna sockeye are a weak stock which has been in long-term decline and cannot sustain the same high harvest rates supported by strong Kenai and Kasilof sockeye runs. Commercial fisheries continue to account for a majority of Upper Cook Inlet harvest of coho in spite of a 35-year-old regulatory directive to minimize harvest of coho for benefit of the sport fishery.

The conservation corridor delivers sockeye and coho into northern rivers and streams to meet escapement goals and provide a successful sport fishery for coho in most years. Regulations also expand the use of terminal fishing areas to focus harvest on abundant Kenai and Kasilof sockeye. These regulations were first adopted in 2011 and subsequently refined over several board cycles based on demonstrated success.

1% Rule – An Orderly Closure

This rule closes a commercial fishery when sockeye catch in two successive fishing periods is each less than 1% of the season's total

Sockeye are the bread and butter of Cook Inlet commercial harvests but these fisheries increasingly harvest a mixture of salmon species in August after the peak of the sockeye run has passed. Commercial fisheries continue to harvest the majority of Upper Cook Inlet harvest of coho (Figure 15) in spite of a regulatory directive to minimize the harvest of coho for benefit of the sport fishery.

1% rules have been adopted into Upper Cook Inlet management plans to establish clear ending dates in the drift and set gillnet commercial fisheries when the sockeye run has passed and catches of the coho begin to build during early August. The trigger is similar in concept to criteria used by ADF&G to end weir or sonar counting for the season.

These rules have proven effective in limiting commercial harvest of coho salmon at the end of the season and have been complemented by reductions in the historical bag limit for coho in sport fisheries. These limitations have helped maintain coho at sustainable levels in the face of highly-variable abundance patterns from year to year.

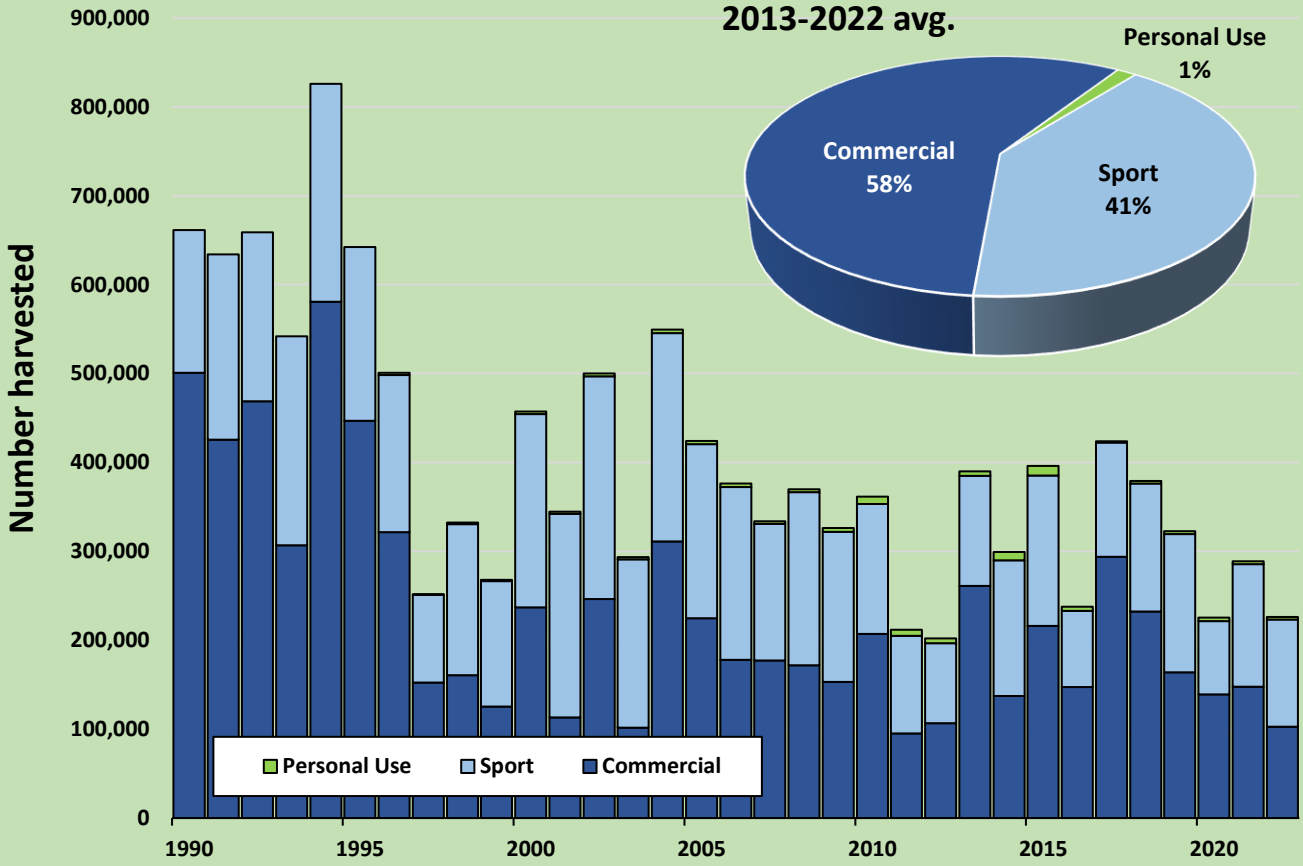
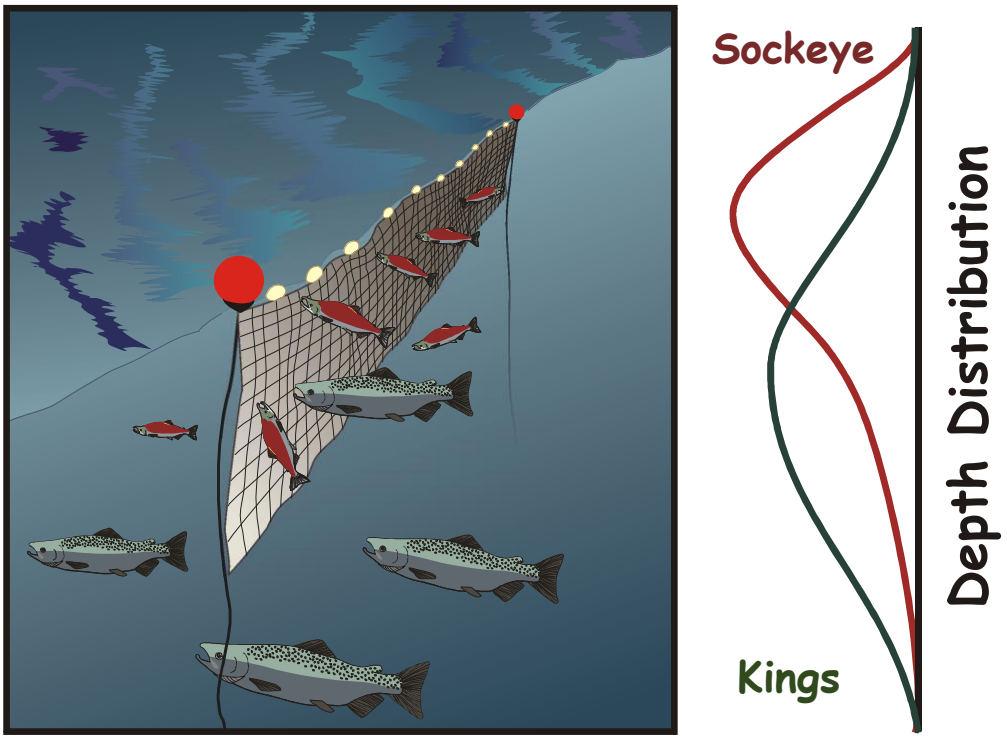


Figure 15. Annual harvests and recent harvest shares of Upper Cook Inlet coho salmon.

Shallow Gillnets – Selective Harvest

Shallower gillnets are being used in the east-side setnet fishery in an attempt to increase gear selectivity for sockeye and reduce harvest of kings

Current management plans provide incentives for use of shallow 29 mesh nets of in place of the normal 45 meshes. The weight of available evidence indicates that shallower nets are likely more selective for sockeye because kings tend to swim more deeply in the water column.



Shallow nets are used to reduce king harvest in other Alaska commercial fisheries including Bristol Bay where 29 mesh nets have been used since at least the 1970's [5 AAC 06.331].

Potential benefits of shallow nets in Upper Cook Inlet were identified by Bethe & Hansen (1998). Their study found that catches of sockeye tended to occur disproportionately in the upper two thirds of set nets while vertical distribution of kings was nearly uniform. Offshore nets almost always caught fewer kings and sockeye than near or mid-shore nets.

Subsequent research in Upper Cook Inlet has supported the earlier study. Telemetry studies during 2012-2013 found that kings typically migrated closer to shore, swam more deeply in the water column and spent more time milling outside the river mouth than sockeye (Welch et al. 2013, 2014, 2015, 2017; Willette et al. 2015).

In 2023, a pilot study in the east-side set gillnet fishery provided new information on the operation and potential effectiveness of shallow gillnets for reducing king catch (Welch et al. 2023). This project used fishery observers to assess selectivity of different net depths for sockeye and kings. Effects of mesh depth on fishing depth over the tide cycle were also evaluated with acoustic telemetry.

Key Results of the 2023 Pilot Study (adapted from Welch et al. 2023)

1. Test fishery gillnets harvested 9,547 sockeye and six large kings, a ratio of 1,591 to 1. Three additional large kings were caught and released. Mortalities of large kings averaged 0.1/net day. Mortalities of all kings averaged 0.5/ net day.
2. Gillnets, with a maximum mesh size of 6" by regulation, are selective for small kings (87% the 53 total catch).
3. The low catch of large kings did not provide a statistical basis for identifying a net type or fishing area that reduces the risk of killing large kings.
4. Sockeye harvest rates in inshore sets were similar in 15, 22 and 29 mesh nets as lead lines sit on the bottom and nets fish similar areas.

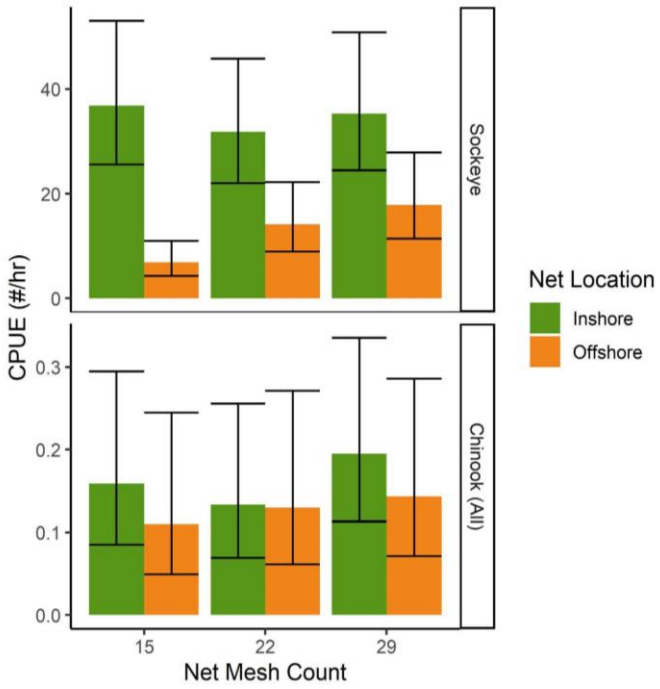


Figure 16. Estimated catch rate with 95% confidence intervals (Figure 6 in Welch et al. 2023).

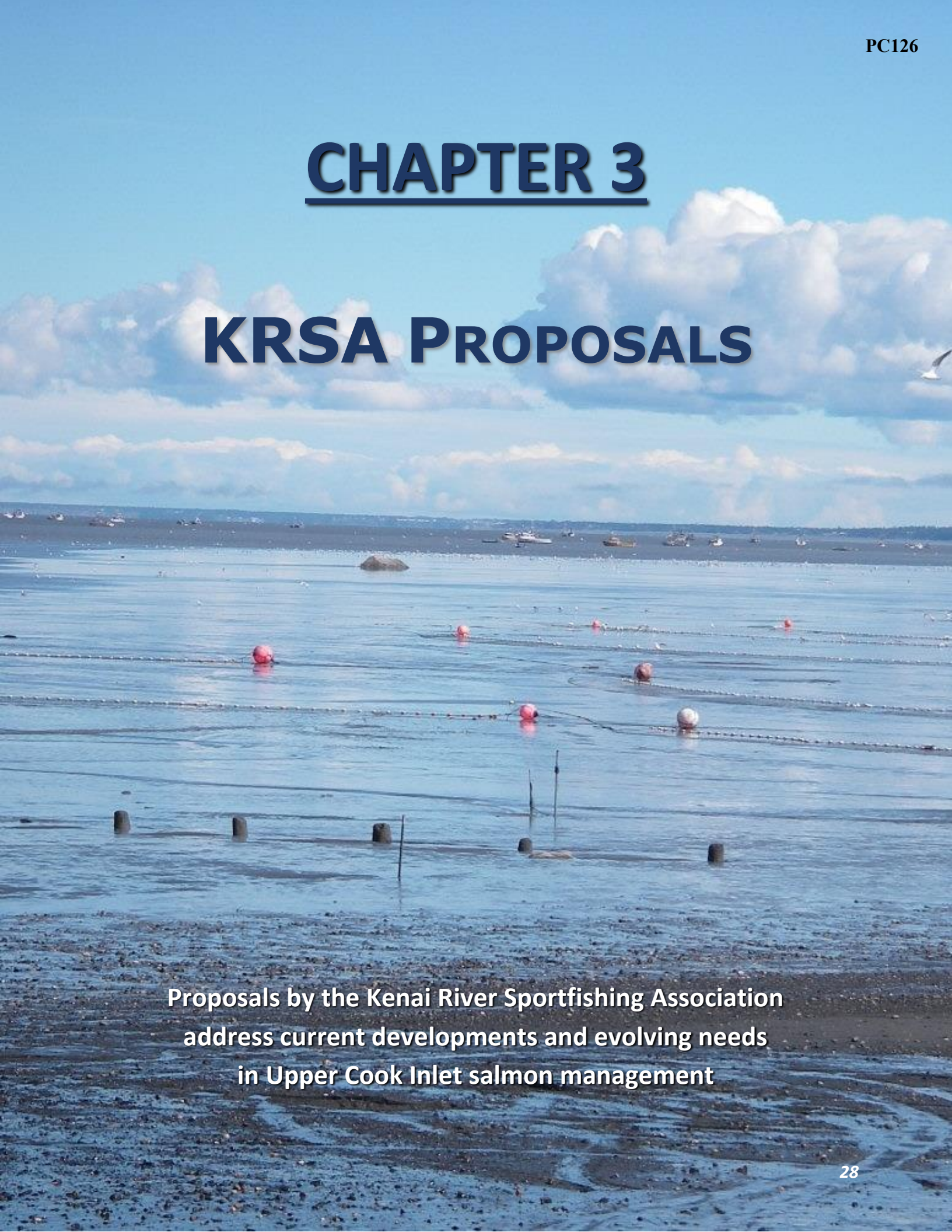
5. Catch rates of sockeye in offshore nets decreased in proportion to mesh number (e.g., 15 mesh nets caught half as many as 29 mesh nets).
6. Median fishing depth was similar for 15, 22 and 29 mesh nets fished inshore. In offshore sets, 15 mesh nets fished deeper than the 22 and 29 mesh nets except during slack water (likely due to the effects of drag when the tide is running).
7. Additional test fishing and a complementary telemetry program could provide useful information on the selectivity of shallow nets for sockeye versus kings.

KRSA Assessment

- ✓ Shallow gillnets are capable of harvesting large numbers of sockeye in the east-side fishery.
- ✓ Although large kings are caught in only small numbers the test fishery, total harvest would likely be significant when multiplied across a full setnet fishery. For instance, harvest of large kings would be 960 if 300 of 732 set gillnet permit holders fished for 16 days with two of four allowed nets each at 0.1 large kings per net day. Total king catch including small kings would be 4,800.
- ✓ If 2023 catch rates are representative, this hypothetical example suggests that reported catches of large kings in the east-side set net fishery might be substantial underestimates of actual catch. The prevalence of catch and release of large kings in the fishery is unknown.
- ✓ Small sample sizes of large kings in the catch lack statistical power to identify differences between mesh depths if they exist. More test fishing is needed.
- ✓ Shallow nets might be much less effective in protecting kings at inshore sites where nets of all depths fish the entire water column. However, shallow nets fished offshore substantially reduced catches of sockeye relative to inshore sites.

CHAPTER 3

KRSA Proposals



Proposals by the Kenai River Sportfishing Association address current developments and evolving needs in Upper Cook Inlet salmon management

Proposal #90 - Extended Weekend Window

Extend the weekend window from 36 to 48 hours under paired restrictions and in the two lower sockeye run tiers under normal sockeye management.

Both the Kenai late-run king and Kenai late-run sockeye management plans currently require a 36-hour continuous closure beginning between 7:00 pm Thursday and 7:00 pm Friday. These windows pass regular pulses of salmon escapement into the river when fish are returning, distribute escapements over the duration of the run and also provide opportunity to the inriver personal use and sport fisheries over the weekend.

Recent practice has extended the window to 48 hours. Hour limits on the east-side set net fishery produce significant periods of no fishing during the week. The 48-hour windows schedule the no-fishing period around the weekend for maximum effect and help personal use and sport fisheries manage for sockeye escapement goals by maximizing harvest during weekend periods of high effort.

5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan

(e)(3) …

(A) if the use of bait is prohibited in the Kenai River sport fishery under (1)(A) of this subsection, commercial fishing periods are open for no more than 48 hours per week, with a **48-hour** [**36-HOUR**] continuous closure per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;

(B) if the use of bait and the retention of king salmon greater than 34 inches in length as defined in 5 AAC 75.995(a) are prohibited in the Kenai River sport fishery under (1)(B) of this subsection, commercial fishing periods are open for no more than 36 hours per week, with a **48-hour** [**36-HOUR**] continuous closure per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;

(C) if the use of bait and the retention of king salmon prohibited in the Kenai River sport fishery under (1)(C) of this subsection, commercial fishing periods are open for no more than 24 hours per week, with a **48-hour** [**36-HOUR**] continuous closure per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;

5 ACC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan

(c) …

(1) at run strengths of less than 2,300,000 sockeye salmon, …

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 48-hour period per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday;

(2) at run strengths of 2,300,000 - 4,600,000 sockeye salmon, …

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous **48-hour** [**36-HOUR**] period per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday and for one continuous 24-hour period per week beginning between 7:00 p.m. Monday and 7:00 a.m. Wednesday;

Proposal #106 - Shallow Net Requirements

Direct or incentivize use of 29 mesh rather than 45 mesh gillnets in 600-foot openers of the east-side set net fishery under paired restrictions

Harvest of king salmon is a significant constraint on the opportunity to catch more-abundant sockeye in the Upper Cook Inlet set gillnet fishery.

The Kenai River Late-Run King Salmon Management Plan (e)(3)(F) currently exempts Upper Subdistrict set gillnet commercial fishing periods within 600 feet of the mean high tide mark from hour and gear limitations that otherwise apply under paired restrictions.

Paired restrictions allow for CFEC permit holders to fish more setnets when nets are 29 meshes deep rather than 45 meshes deep. Shallower nets are likely more selective for sockeye than kings because kings often travel deeper in the water column.

Shallow nets are a critical tool which enhances the opportunity of the commercial setnet fishery to harvest abundant sockeye while reducing harvest of king salmon. This tool is particularly important during periods of low king abundance which trigger paired restrictions in the Kenai king plan.

5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan

(F) Upper Subdistrict set gillnet commercial fishing periods that are limited under this section may be limited under this section may be limited to fishing within 600 feet of the mean high tide mark and are exempt from hour [**AND GEAR**] limitations identified under (e)(3)(A)-(E) of this section.

Proposal #112 - Kenai Sockeye Inriver Goals

Standardize the upper end of the inriver goal range at a consistent high level across the sockeye run tiers

This change avoids potential confusion and conflicts in escapement priorities between the bottom end of the king goal and the upper end of the sockeye inriver goals. The lower end goals must always take priority over the upper end goals due to the relative impacts on future returns.

Kenai Sockeye Run Tier	Inriver Goal Range	
	Current	Proposed
<2.3 million	1.0 – 1.2 million	1.0 – **1.6 million**
2.3 – 4.6 million	1.1 – 1.4 million	1.1 – **1.6 million**
>4.6 million	1.2 – 1.6 million	1.2 – 1.6 million

Inriver goal ranges are identified In the Kenai River Late-Run Sockeye Salmon Management Plan to distribute escapement throughout the SEG according to run size with allowances for sport harvest upstream from the sonar at river mile 19.

Management for these lower inriver goal ranges creates confusion regarding management priority when it is not possible meet the low end of the Kenai king goal while also remaining within the upper end of the reduced inriver goal range. Current inriver goal ranges are quite narrow and difficult to hit due to the inherent variability in sockeye run timing which subjects fishery managers to undue and artificial criticism when inriver goals are not met even when the SEG is achieved.

Current data indicates that maximum sustained yield is produced by escapements substantially greater than previously thought for Kenai River late-run sockeye. The upper ends of inriver goals in the lower two sockeye abundance tiers currently produce escapements less than the upper end of the SEG.

5 ACC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan

(c) …

(1) at run strengths of less than 2,300,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 1,000,000 – **1,600,000** [**1,200,000**] sockeye salmon past the sonar counter at river mile 19; and

…

(2) at run strengths of 2,300,000 - 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 1,100,000 – **1,600,000** [**1,400,000**] sockeye salmon past the sonar counter at river mile 19;

Proposal #141 - Shallow Net Incentives

Direct or incentivize use of 29 mesh rather than 45 mesh gillnets in the east-side set net fishery even when not operating under paired restrictions

Current regulations do not provide adequate protection for Kenai late-run king salmon in the east-side set gillnet fishery at such time that numbers recover enough to get out of paired restrictions. We are currently in an extended period of low king productivity and are likely to continue to be challenged by low abundance even if we are not under paired restrictions. Without additional management tools, more-normal management is likely to fish us back into paired restrictions in the course of a season under reduced king runs.

Paired restrictions are identified in the Kenai River Late-Run King Salmon Management Plan as a conservation measure during periods of low abundance. The plan incentivizes use of shallow nets as a conservation measure during periods of low king abundance. The regulation allows for 4 nets if 29 meshes but only 2 nets if 45 meshes (or 2 @ 29 meshes vs. 1 at 45 meshes). However, current regulations do not allow for ADF&G to limit set gillnets to shorter depths during normal fisheries when paired restrictions are not in effect and the fishery is governed by the Kenai River Late-Run Sockeye Salmon Management Plan. Under normal circumstances a set gillnet in the Central District commercial fishery may be up to 45 meshes in depth.

Use of shallow nets needs to be extended under normal circumstances when paired restrictions are not in effect. Use of shallow set gillnets will increase opportunity for the commercial setnet fishery to harvest abundant sockeye while reducing harvest of king salmon. Shallow nets are likely more selective for harvest of sockeye than kings because kings often travel deeper in the water column.

5 AAC 21.331 Gillnet Specifications and operations

(d) A set gillnet may not be more than 35 fathoms in length and 45 meshes in depth. South of the latitude of Anchor Point, 30 fathoms of seine webbing may be used on shore between high and low water levels. A person may not operate more than four set gillnets with more than 105 fathoms of set gillnet in aggregate, except that

(2) **In the Upper Subdistrict, a CFEC permit holder shall be restricted to up to four set gillnets that are each not more than 35 fathoms in length, 105 fathoms in aggregate length and 29 meshes in depth, or two set gillnets that are each not more than 35 fathoms in length and 45 meshes in depth.** [**REPEALED 6/11/2005.**]

Proposal #150 - Kasilof King Salmon Management Plan

Establish a dedicated management plan for Kasilof late-run kings

A significant Kasilof late-run king salmon population has been identified by recent stock assessments. This population historically supported a thriving sport fishery but, like king salmon throughout Alaska, is in severe decline. Significant harvest of Kasilof late-run kings also occurs in the east-side set gillnet fishery according to genetic stock identification.

No management plan is dedicated specifically to this stock. Current management incidental to other salmon management plans does not provide adequate protection.

5 AAC 21.XXX Kasilof Late-Run King Salmon Management Plan.

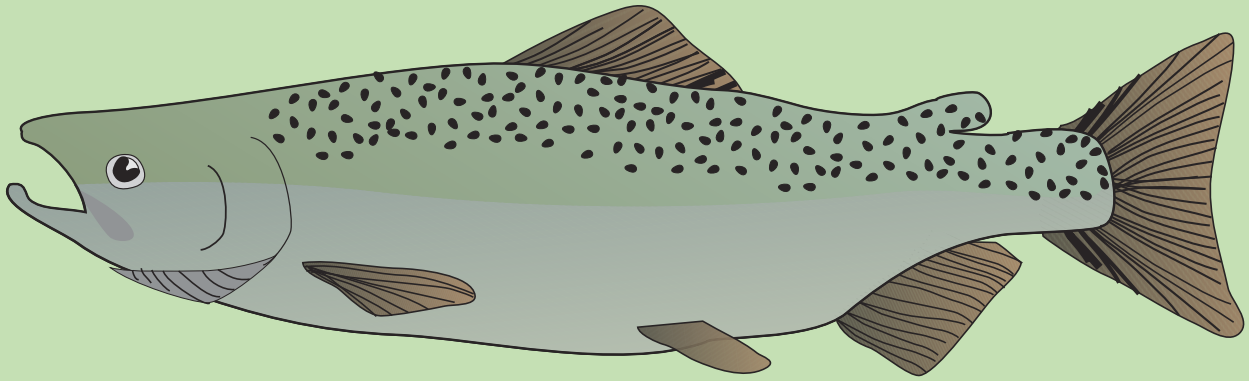
(a) The purposes of this management plan are to ensure an adequate escapement of late-run king salmon into the Kasilof River system and to provide management guidelines to the department. The department shall manage the late-run Kasilof River king salmon stocks primarily for sport and guided sport uses in order to provide the sport and guided sport fishermen with a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of inriver restrictions. The provisions of this management plan are in effect from July 1 through August 15.

(b) In the absence of an established escapement goal, the department shall manage the late run of Kasilof River king salmon in a precautionary manner.

(c) Regulations governing the sport fishery for late-run king salmon in the Kasilof River shall mirror those established by emergency order for the Kenai River as set out in 5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan and implemented by emergency order for the conservation of Late-Run Kenai king salmon.

(c) Conservation of Kasilof River king salmon shall take priority over not exceeding the upper end of the Kasilof River sockeye optimal escapement goal.

(d) The Kasilof River Special Harvest Area shall not be opened to commercial fishing by set or drift gillnet when the Kasilof sport fishery prohibits fishing for king salmon.



CHAPTER 4

KRSA Positions on Other Proposals

Group 1 – Northern Cook Inlet & Susitna

Subsistence, Commercial, Smelt, Sport & Personal Use Fisheries

Northern Cook Inlet Subsistence

204	Yentna Subsistence Salmon allow use of sport gear	Oppose

Northern District Commercial Salmon

205	Close stream mouths to commercial set net fishing in the northern district	Support
206	Reduce from 12,5k to some smaller number the maximum number of king salmon that may be taken annually	Support
207	Reduce from 12.5k the total allowable commercial set net harvest of king salmon and pair opening of commercial fishery to Deshka River opening to harvest	Support
208	Pair closure of the commercial set net fishery for king salmon with closure of the Deshka River sport fishery	Support
209	Close commercial set net fishery by regulation	Oppose
210	Adopt more conservative measures into the management plans for commercial set net fishing	Support
211	Liberalize gear and time restrictions on set net fishing in the Northern District that were adopted as part of the action plan for Stock of Management Concern Susitna sockeye	Oppose
212	Adopt more conservative measures into the management plans for commercial set net fishing	Support
213	Pair restriction to one set gill net with opportunity for personal use in the Susitna personal use fishery	Support concept
214	Pair restriction to one set gill net and time restrictions for commercial set net fishing to opportunity to sport fish in Little Susitna and in Susitna personal use fishery	Support concept
131	Add Wednesday as a third regular period for set nets	Oppose

Cook Inlet Smelt

216	Reduce the commercial smelt guideline harvest level	Neutral
217	Repeal the Cook Inlet Smelt Fishery Management Plan	Neutral

Susitna River Sport

218	Allow harvest of small (under 24 inch) king salmon in portion of the Susitna Drainage when otherwise closed	Oppose
219	Close fishing for all species within confluence areas of Park's Highway streams and Susitna when fishing for king salmon is closed	Support concept
220	Open additional waters to sport fishing for coho in Big River Drainage	Neutral
221	Increase daily bag and possession limit for coho salmon back up to three a day and in possession from two	Neutral
222	Allow harvest of six pink salmon per day in addition to bag limit for chum, sockeye and coho within the Susitna River Drainage	Support
223	Special management areas for rainbow trout in Susitna	Oppose
224	Special management areas for rainbow trout in Susitna	Oppose
225	Increase harvest of rainbow trout	Oppose
226	Dropper flies	Oppose
227	Increase harvest of Dolly Varden	Oppose

Susitna River Personal Use

228	Close dipnetting in the vicinity of Anderson Creek during the personal use fishery on the lower Susitna River	Support
229	Add two days per week to dipnetting in the lower Susitna River personal use dip net fishery	Support
230	Add day per week and extend date during which the personal use fishery in the lower Susitna River is open	Support
231	Shift the dates during which the personal use fishery in the lower Susitna River is open later by one week	Support

Group 2 – Areawide & Northern Sport & Personal Use

Cook Inlet Areawide Sport Fisheries, Knik River Area Sport Fisheries, and Anchorage Area Sport and Personal Use Fisheries

Cook Inlet Areawide Sport Fisheries

232	Allow Alaska residents to buy more than one sport fishing license and take additional daily bag limits	Neutral
233	Establish additional criteria for sport fish derby	Oppose

Knik River Area Sport Fisheries

234	Clarify the northern boundary of the Knik Arm Management area and the Palmer-Wasilla Zone and exclude certain flowing waters from the Palmer-Wasilla Zone	Neutral
235	Reduce size of the Palmer-Wasilla Zone	Neutral
236	Bookkeeping by ADFG	Support
237	Allow bow and spear for Northern Pike and Blackfish	Neutral
238	Establish a motor size restriction for the Little Susitna River, no size suggested	Oppose
239	Adopt a large fish escapement goal for king salmon on the Little Su, not suggested size for large fish	defer to ADFG
240	Increase the time during which bait can be used in the Little Su to from July 13 and not from August 5	defer to ADFG
241	Pair use of bait in Little Su to openings in ND set net fishery	Support concept
242	Prohibit catch and release of coho salmon in the Little Susitna downstream of the weir at all times and mandate retention	Oppose
243	Restore bag and possession limit of three coho, up from two	defer to ADFG
244	Clarify boundaries of Fish Creek mouth	Support
245	Increase opportunity to sport fish for salmon in Fish Creek	Neutral
246	List lakes where anglers can use up to five lines for NP	Support
247	Prohibit chumming in specific waters	Support
248	Catch and release on Char in Fish Creek drainage	Support
249	Bookkeeping by ADFG	Support

Anchorage Area Sport Fisheries

250	Modify closure date for Ship Creek	Support
251	Reduce opportunity to harvest salmon in Eklutna drainage	defer to ADFG
252	Restore bag and possession limit of three coho, up from two	defer to ADFG
253	Dropper flies	Oppose
254	Add Chester Creek to special management waters for trout	Oppose
255	Create a personal use dip net fishery for salmon in the 20 Mile and Placer Rivers	Support concept

Group 3 – Stock of Concern & Kenai Kings

Stock of Concern- Kenai River Late-Run King Salmon Action Plan, Kenai River Late-Run king Salmon, Kenai River King Salmon, & Upper Cook Inlet Salt Water King Salmon Sport Fishery

Kenai Late-Run King Salmon Action Plan

The Board will be developing an Action Plan to address the recent listing of Kenai late-run king salmon as a Stock of Concern.

ADF&G has identified a list of potential management options for Board consideration (Table 2). However, this list does not appear to include a comprehensive set of options for reducing harvest in the sport or commercial setnet fisheries. Some options identified by ADFG actually increased king harvest by allowing setnet fishing below the king OEG or opening the special harvest area at the mouth of the Kasilof River.

As Kenai late-run kings had not yet been designated as a stock of concern as of the Upper Cook Inlet proposal deadline, KRSA will provide comments and recommendations at the Board of Fisheries meeting regarding management measures necessary to ensure long-term viability and foster rebuilding of Kenai late-run king salmon from current critically low levels.

Cook Inlet salmon management plans are intricately linked such that measures adoption in the Kenai late-run king salmon action plan will by extension be applicable to a variety of competing proposals throughout the meeting agenda.

Table 2. Options identified by ADFG (adapted from Lipka et al. 2023)	
Inriver Sport	1A. Status quo: Paired restriction step downs, OEG of 15,000 – 30,000 1B. Restrict fishing for king salmon to nonretention 1C. Reduce the king salmon sport fishing season 1D. Allow inriver sport fishing opportunity when preseason and inseason projections of Kenai River king salmon escapement are above 13,500 large fish and below 15,000 *(no retention, no bait, reduced days, resident harvest, no liberalizations)* 1E. Close king salmon sport fishery 1F. Remove bait during the August inriver sport fishery (coho timeframe) 1X. Increase sockeye salmon bag limit to 6/day, 12/possession *(to limit sockeye escapement)*
Marine Sport	2A. Status quo: closure as per paired restriction when below OEGs of 15,000 – 30,000 2B. Modify provisions of the Upper Cook Inlet Summer Salt Water King Salmon Plan (combination) 2C. Restrict to nonretention 2D. Reduce the king salmon sport fishing season 2E. Reduce the king salmon sport fishing area 2F. Close Cook Inlet marine king salmon sport fishery
Drift Gillet	3A. Status quo: EO nearshore restriction when setnets are closed *(1-1.5 miles N/S of Kenai)* 3B. Prohibit CDDGN fishery within 2 miles of shore 3C. Close CDDGN fishery in state waters
Set Gillnet	4A. Status quo Paired restriction step downs, OEG of 15,000- 30,000 4B. Allow restrictive ESSN opportunity when preseason and inseason projections of Kenai River king salmon escapement are above 13,500 large fish and below 15,000 large fish *(unspecified time, area & gear limits, require retention)* 4C. Allow ESSN opportunity when preseason and inseason projections of Kenai River king salmon escapement are above 13,500 large fish and below 15,000 *(2x12 hr/ wk, max 4 periods, require retention & observers, commissioner authority for net depth, #, nearshore)* 4D. Allow dip nets to be legal commercial fishing gear in UCI and create specified commercial dip net zones or times in the Kenai and Kasilof Rivers. Allow use of beach seines in the ESSN area by UCI set gillnet permit holders (*current area, KSHA, PU areas including potentially exclusive times*) 4E. Close ESSN fishery 4X. Allow opening of Kasilof River Special Harvest Area (KRSHA) when ESSN is closed for king salmon conservation to target Kasilof River sockeye salmon *(to limit sockeye escapement)*
Kenai PU	5A. Status quo EO to prohibit retention 5B. Allow retention of king salmon less than 20 inches in the personal use fishery 5C. No retention of king salmon in the personal use fishery 5D. Restrict time or close Personal Use Fishery 5X. Increase area of Kenai and Kasilof Rivers personal use dipnet fishery *(to increase sockeye harvest)* 5Y. Increase time of Kenai and Kasilof Rivers personal use dipnet fishery *(to limit sockeye escapement)*
Kasilof PU	6A. Status quo EO to reduce setnet hours 6B. Restrict time or close personal use fishery 6X. Reduce legal mesh size of Kasilof River personal use gillnets (*6 to 4.75" to increase sockeye harvest efficiency*)

Kenai River Late-Run King Salmon

80	11.7 bottom, to 15 set GHL at 200 per Kasilof and Kenai	Oppose
83	Extensive rewrite of KRLRKSMP to make it more conservative in all respects	Many good points but unrealistic
85	Prohibit use of motorized vessels in the Kenai River if sport fishery for king salmon is closed	Oppose
86	Prohibit bait after August 1 during coho fishery if king salmon fishery is closed at the end of July	Support
87	All guided sport fishing and transport of anglers closed on Kenai and Kasilof rivers when king salmon fishery is closed	Oppose
88	Prohibit nonresidents from fishing from a registered guide vessel on the Kenai River when king salmon is closed	Oppose
90	**Extend Friday "window" from 36 to 48 hours (KRSA Proposal)**	**Support**
91	Amend criteria for allowing set net fishing in Upper Subdistrict after August 1 from achieved to projected	Oppose
92	Exempt East Foreland Section from paired restrictions in KRLRKSMP	Oppose
93	Exempt East Foreland Section from paired restrictions in KRLRKSMP	Oppose
94	Modify gear incentives to allow up to three shorter shallow nets not to exceed total	Oppose
95	Allow up to 50 fathoms of 22 mesh depth per net 200 fathoms total	Oppose
96	Allow use of flagged nets instead of Closures for king salmon	Oppose
97	Based on preseason 13.5 - 15 fish Upper Subdistrict 24 hours, one net per permit, 29 mesh max, after July 20 all close unless 15 is projected	Oppose
98	Allow two days of set net fishing within 1200 ft Kasilof and 600 ft Kenai when otherwise closed	Oppose
99	Revert back to all size SEG goal and liberalize set net	Oppose
100	When projecting 13.5 or greater may 600 ft with single net per permit and depth not to exceed 29 mesh, no time restriction.	Oppose
101	600 ft openings would count toward any time restriction for set net fishery	Oppose 600 ft openings
102	if projecting to meet 13.5 then set net must get 24 hrs per week within 600 ft	Oppose
103	Allow commercial harvest by commercial fishing permit holders with dip nets fished within 600 ft of shore from boats no greater than 25 ft when set net fishing is closed or otherwise restricted	Neutral

104	Adopt a four-part plan including TAC of chinook, fisherman MOU, new area and gear	Oppose
105	allow set net fishing within 600 ft when it would be closed for king salmon conservation	Oppose
106	**Restrict legal set net gear to max 29 mesh depth when fishing within 600 ft (KRSA Proposal)**	**Support**
107	Delete within 600 ft opportunity and replace with outside of one-half mile opportunity with shallow nets	Support
108	Exempt 600 ft fishery from restrictions based on preseason projections	Oppose
110	When sockeye goals are projected to be exceeded then set nets may fish within 1500 ft of shore	Oppose
116	Repeal mandatory weekly "window" closures in the commercial set net fishery of the upper subdistrict	Oppose
117	Repeal "paired restrictions" from Upper Subdistrict set gill net fishery regulations	Oppose
109	allow set net fishing within 1/2 mile of shore between Humpy Point and the Blanchard line when projected to exceed Kasilof OEG for sockeye, one net, 29 mesh	Oppose
75	Repeal OEG and replace with SEG	Oppose
76	Repeal OEG and replace with SEG	Oppose
77	Repeal OEG and replace with SEG, if greater than 12, is projected then 24 hr, one net per permit	Oppose
78	Repeal OEG and replace with SEG, if greater than 12, is projected then 24 hr, one net per permit	Oppose
79	If 13.5 - 15 sport closed upstream of rm 10 and set nets restricted to one net per permit, 24 hrs per week, 29 mesh max	Oppose
81	13.5 -15 minimum of two 12 hrs periods within 600 ft	Oppose
82	Repeal Intent language is KRLRSSMP that has guided regulatory development since the 1990's	Oppose
84	Close Kenai River sport king salmon when preseason forecast is less than 20k large kings	Oppose
89	Prohibit nonresidents from fishing for king salmon on the Kenai River	Oppose

Kenai River King Salmon

146	Align the Kenai River Drainage Area methods and means provisions with the season dates for Kenai River king salmon	Support
147	Reduce the annual bag limit for Kenai king salmon to one fish over 34 inches	Neutral
148	Close to fishing from motorized vessel on Wednesdays and Fridays	Oppose
149	Prohibit catch and release for king salmon in Kenai	Oppose

Upper Cook Inlet Salt Water King Salmon Sport Fishery

1	Close fishery May 15 to July 15 based on Anchor River run projection	Support
2	Prohibit closure based on forecast	Oppose
3	Fishery remains open if set net fishery is open	Oppose
4	Move regulatory point from Bluff Point to Anchor Point	Oppose

Group 4 – Sockeye Salmon Management

Kenai & Kasilof Management Plans

Kenai River

111	Adopt sockeye OEG for Kenai of 450k to 750k	Oppose
112	**Increase upper bound of each in river goal range for Kenai sockeye to allow for conservation of king salmon when required (KRSA Proposal)**	**Support**
113	Adopt OEG for Kenai sockeye of 600k to 800k	Oppose
114	Adopt OEG for Kenai sockeye of 700k to 850k	Oppose
115	Delete intent language from KRLRSSMP that has guided regulatory development since the 1990's	Oppose

Kasilof River

118	Change Kasilof sockeye goal from 140k to 370k to 150k to 250k	Oppose
119	Allow the KRSHA to remain open when the remainder of the set net fishery is closed	Oppose
120	Repeal intent language that speaks to restrictive use of KRSHA	Oppose

Group 5 – Commercial Fisheries

Central District Drift Gillnet, Fishing Districts, Gillnet Specifications & Operations, Pink Salmon, Hatchery Production, Upper Cook Inlet Management Plan, West Cook Inlet

Central District Drift Gillnet

121	Repeal intent language that has guided regulatory development of drift fishery since 1990's and replace with language that favors harvest by drift fishery	Oppose
122	Repeal the 'one percent rule' in the Central District drift gillnet fishery	Oppose
123	Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans	Oppose
124	Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans	Oppose
125	Repeal sections of the CDDGFMP to provide additional commercial opportunity for drift fishery	Oppose
126	Increase drift gillnet fishing opportunity in Drift Gillnet Area 2	Oppose
127	Increase time for Drift Fishery to two 12 hr openings inlet wide and one 12 hr opening in 6-mile corridor each week	Oppose

Fishing Seasons, Weekly Periods, Set Gillnet Gear, and Registration

128	North K Beach shall fish with both Kasilof and Kenai	Oppose
129	Allow North K Beach to fish early with Kasilof openings	Oppose
130	Lengthen set net season through end of August	Oppose
132	Add Wednesday as a third regular period for set nets	Oppose
133	If set nets do not fish at least 2 12's a week then other fisheries must be closed or restricted "equally"	Oppose
134	Commercial fisheries must fish at least 2 days per week	Oppose
135	Close Chinitna Bay Subdistrict to commercial fishing for salmon	Support
136	Prohibit commercial drift fishing within 1 mile of mouth of Silver Salmon and Shelter creeks	Support
137	Add the Little Susitna River to the list of waters in the ND where commercial fishing is prohibited within distance from mouth	Support
138	Allow use of a seine lead in the set net fishery and redefine minimum distance between gear	Oppose
139	Allow reef nets	Oppose

140	Allow reef nets?????	Oppose
141	**Direct or incentivize use of 29 mesh depth gill nets in the upper subdistrict at all times (KRSA Proposal)**	**Support**
142	Require that jack king salmon be recorded on fish tickets	defer to ADFG
143	Allow Upper Cook Inlet set gillnet permit holders to fish in more than one registration area per year	Oppose

Hatchery Production

43	Reduce hatchery production	Neutral

Pink Salmon

144	Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation	Oppose
145	Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation or allocation of coho salmon	Oppose

Group 6 - Kasilof & Kenai River Sport, Vessels & Guides

Kasilof River King Salmon Sport Fisheries, Vessel & Habitat Restrictions, & Guides

Kasilof River King Salmon Sport Fisheries

150	**Create a Kasilof River Late-Run King Salmon Management Plan separate from linking Kasilof management to Kenai (KRSA Proposal)**	**Support**

Kenai River Vessels and Habitat Restrictions

151	Add drift boat only on Thursdays and define size of motor	Oppose
152	Prohibit motorized vessels on the Kenai River	Oppose

Guides - Kenai and Kasilof Rivers

153	Allow guiding on the Kenai River on Sundays and Mondays	Oppose
154	Allow guiding on the Kenai River without day and time restrictions if the king salmon fishery is closed	Oppose
155	Allow guiding on the Kenai River on Sundays and Mondays if king salmon fishery is closed	Oppose
156	Allow sport fishing from a guided nonmotorized vessel on Mondays May-July	Oppose
157	Allow anglers to fish in the Kenai River on Mondays in August and September from a guided vessel	Oppose
158	Allow sport fishing from a guide vessel on Sunday and Monday with no hour restrictions	Oppose
159	Allow sport fishing from a guide vessel on the Kenai River on Mondays from August 1 - November 30	Oppose
160	Restrict guided fishing when not fishing from a guide vessel	Oppose
161	Restrict guided fishing when not fishing from a guide vessel	Oppose
162	Allow guiding on the Kenai River prior to 6:00 a.m. and after 6:00 p.m.	Oppose
163	Reduce the time allowed guided fishing from a vessel in the Kasilof River	Oppose
164	Limit sport fish guiding in the Kasilof River	Oppose

Group 7 - Kenai, Kasilof & Russian River Sport & Personal Use

Sport Fishery

165	Dropper flies	Oppose
166	Conservation of rainbow trout on Upper Kenai	Support
167	Conservation of rainbow trout on Upper Kenai	Oppose
168	Two flies	Oppose
169	Hook and hand	Oppose
170	Go back to backtrolling at Eagle Rock	Oppose
171	Allow anglers to fish downstream of the Soldotna Bridge after taking a limit of coho salmon	Oppose
172	Allow fishing from a vessel after retention of a limit of coho salmon on the Kenai River	Oppose
173	Prohibit the use of bait into August if restrictions were in place for king salmon on July 31	Support
174	Prohibit the use of bait only until August 7 if restrictions were in place for king salmon on July 31	Oppose
175	Reduce the bag and possession limit for coho on the Kenai River after August 30 from 3 to 2 fish	Oppose
176	Reduce the bag and possession limit for coho on the Kenai River after August 30 from 3 to 2 fish	Oppose
177	Reduce daily bag and possession limit for coho salmon taken in the Kenai River after August 30 from three to two fish	Oppose
178	Prohibit fishing for coho in the Kenai until August 1 to protect king salmon from being taken	Oppose
179	Close additional waters in Upper Kenai to protect late spawning coho salmon	Oppose
180	Close waters of the Kenai River from the Sterling Highway Bridge to Kenai Lake during winter months to protect spawning coho	Oppose
181	Close waters of the Kenai River from the Lower Killey to the outlet of Skilak during winter months to protect resident species	Oppose
182	Prohibit nonresidents from fishing on the Kenai River	Oppose
183	Russian River bag limit increase earlier if in season data supports	Support
184	Location of boat retrieval site accommodation	Support
185	Allow only unbaited, single-hook artificial lures in the Kasilof River	Oppose
186	ADFG stocked lakes	Support
187	Motor reg	Support
188	Hidden Lake lake trout conservation	Oppose

Personal Use

189	Require personal use guides in Cook Inlet to adhere to sport fishing guiding requirements	Oppose
190	Establish a unique set of guiding requirements for guiding personal use fishers	Oppose
191	Reduce bag limits in personal use fisheries and complicate them by basing them on exceeding management objectives	Oppose
192	Make openings of the personal use fisheries concurrent with openings of the commercial fisheries	Oppose
193	Require king salmon caught and released in the Cook Inlet personal use fisheries not be removed from the water	Oppose
194	Allow retention of Dolly Varden in the Kenai and Kasilof personal use fisheries	Oppose
195	Restrict EO authority to ONLY extend fishing time for the shore-based personal use fisheries in the Kenai and Kasilof	Oppose
196	Prohibit personal use fishing in the Kenai River from an anchored vessel for safety justification	Oppose
197	Allow retention of king salmon in Kenai River personal use fishery on by EO when OEG is projected to be exceeded	Oppose
198	Prohibit transport of fish caught in the Kenai River personal use fishery from being transported by a motorized vessel upstream of the Warren Ames Bridge	Oppose
199	Prohibit transport of fish caught in the Kasilof River personal use fishery from being transported by a motorized vessel upstream of river mile 3	Oppose
200	Close the Kasilof personal use gillnet fishery when king salmon restrictions for wild fish are in place on either the Kenai or Kasilof rivers	Support
201	Close the personal use fishery on the Kenai River when the commercial drift fishery is closed or restricted	Oppose
202	Reduce the legal mesh size of a set gillnet in the UCI personal use fisheries	Oppose
203	Move the regulatory markers for the Kasilof personal use dip net fishery to reduce citations	Oppose
215	Add additional fishing periods to northern district set gillnet fishery	Oppose

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February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm connected to seafood processing in Anchorage, Alaska. Hatcheries in the Cook Inlet region and across Alaska are critically important to both fishermen (commercial and sport) and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon for their living. Processors need the volume of salmon in order to stay viable and operating for all fisheries, and hatcheries were established in Alaska with significant and necessary restrictions in the form of the sustainable salmon policy and genetic policy. These are enhancement programs well supported by the state historically for the benefit of all Alaskans -- personal use, subsistence, sport, commercial. The research that is ongoing through the Hatchery Research Plan is critically important to pay attention to and understand prior to making any changes.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Nicole Kimball
[redacted]
Anchorage, Alaska

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To: John Wood, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

February 12, 2024

RE: Upper Cook Inlet Finfish, Opposition to Proposal 43

When it comes to the science directed at salmon in Alaska, and especially science directed at hatcheries, it seems to fall into 2 distinct categories. The first is the kind of science focused on the salmon themselves—what's going on with a particular stock? What can affect salmon returns or survival, their environment, what they encounter; what are the obstacles to survival? This science draws directly from data and presents results and analysis that are based on facts and probabilities without assigning meaning or values of "good" or "bad." The second kind of science is the kind that appears to pre-suppose that hatchery fish are a problem and goes about "proving" it by drawing conclusions from other works or noted trends. The use of other works and data and the use of correlation is not an illegitimate approach in science in general, but there is a real danger in how those practicing this form of science can pick and choose what information they elect to present, or consider, as they apply their selected analysis and utilize it to present value-laden conclusions.

When science and advocacy meet, it's called normative science. Someone recently brought to my attention the work of Dr. Robert Lackey (retired) of Oregon State University, and I've attached two of his essays with this letter. It's not the first time I've seen or read Dr. Lackey's work, but it's the first time I realized that he so accurately names the conundrum of so much of the information that is doled out to the public through the media—specifically that which condemns Alaska's pink salmon hatchery production. Those attention-grabbing headlines and full-scale condemnation of pink salmon production? Most often, it's advocacy couched in science.

At the same time you see normative science making its way into the headlines, a more "mundane" body of work accumulates which provides a counter to that narrative. That work, however, doesn't get the headlines because, in many cases, it's not really about hatchery pink salmon at all. While it's true that those of us who have gathered that information together are also presenting scientific information that supports our position, an important distinction exists: the information we present wasn't conducted with the express purpose of exonerating hatchery programs. It exists independent of any claims we may make one way or another, but taken together, it indicates that Alaska hatchery pink salmon is not the problem. For this meeting, the Alaska hatchery operators have submitted as a group a summary of some of this compiled information for your review.

In Alaska, the existence of the Board of Fisheries serves to separate the Alaska Department of Fish & Game from allocation and policy decisions. As a result, they have the ability to mostly remain focused on scientific pursuits that do not fall into the sphere of normative science. Still, there are instances where ADF&G scientists are asked to evaluate information or claims or to determine the validity of external publications that do fall within that sphere. In those instances, ADF&G must walk a fine line or be accused of advocacy themselves.

A recent submission to the Board of Fisheries makes claims of advocacy by the Department in support of the hatchery programs in Alaska. There's a suggestion that the hatchery programs are protected by the Department and that they hold some unassailable position and are left unchecked and unquestioned. The irony of these claims is that the hatchery programs have been before the Board at almost every turn for the last 5 years (and many times in the past two or three decades). The programs have been constantly questioned—both internally and externally—for most of their history. The Alaska Hatchery Research Project (AHRP) and Hatchery-Wild Interaction (HWI) Study exist to question the hatchery programs in Alaska and to seek answers related to valid questions on hatchery production. The AHRP has an independent Science Panel to assure the research is conducted in a manner that is neither biased toward nor against hatcheries. ADF&G has hired biologists to look into mechanisms affecting wild stock productivity, including whether Alaksa hatchery production is impacting ocean survival (Salmon Ocean Ecology Program). Two separate bodies conferring sustainability certification have conducted multiple reviews of Alaska salmon fisheries and have scrutinized hatchery programs and certified the fisheries and management in Alaska. That none of these lines of questioning have produced a "smoking gun" via the Alaska hatchery programs is then interpreted by some as lack of questioning and bias in favor the hatchery programs. However, with regard to all of the previous and recent proposals, isn't it reasonable to conclude that a Board, charged with the weight of fisheries regulatory, allocation, and policy decisions, has reviewed the reams of literature and information provided over these last 5 years and has simply not found there to be sufficient evidence to support the claims in the various proposals? Isn't it possible to accept that the Department has looked at these same questions, and their answers are rejected by some members of the public because they do not conform to their beliefs?

There is no question that position on an issue, and belief, alters perspective. As hatchery operators we have perceived a relentless barrage of biased science and unfounded claims which have been soundly refuted by evidentiary science at every turn. We perceive constant questioning and feel there is intense scrutiny and a high bar for new projects of production. We know there are projects that are rejected or never see the light of day because there is thorough review and critique of proposed production and any potential impacts. It seems to us as though we have been dragged before the Board of Fisheries, highlighted negatively in the media, and called upon time and again to prove the scientific defensibility and transparency of the programs, and yet there still appears to be a persistent belief that our closely examined and highly regulated operations exist in an unchecked and unregulated environment of constantly expanding production. To those convinced that hatcheries pose a problem for wild stocks, they perceive bias in favor of hatcheries, a failure of scrutiny, and a dismissal of the literature before them which appears to implicate hatcheries.

As hatchery operators, though we exist within the scientific world, we are rarely in the position to conduct empirical research and are thus reliant on external sources for the science related to hatcheries. That

includes science, analysis, and assessment from ADF&G and the hope they will provide information in an unbiased manner. In order to provide sufficient oversight and regulation of the permitting and compliance of the programs there is a section at ADF&G charged with those functions. It is their job to know and understand the science presented about hatchery programs and, when questioned, to speak to the programs based on that knowledge. When ADF&G is asked to weigh in, I have observed careful navigation of the line where interpretation could cross the line to advocacy, but I have also observed occasion where even factual information is attributed as bias by stakeholders when it doesn't meet a desired outcome or explanation.

From my perspective, ADF&G is keenly aware of their obligation to critique and remain critical of hatchery programs and production. If there are issues, they are mandated to acknowledge and address those through programmatic examination and alteration. We expect that they will bring that examination and evaluation in a fashion that is as unbiased as possible because, as much as the programs demand scrutiny, they also demand recognition of the care and caution that was invested in their development. That care and caution has been validated over time. The weight of evidence supports that the programs have met the critical requirements put in place for the protection of wild stocks. However, we hatchery operators, if we are honest, must also be in a constant state of self-reflection. Each article we review and each research project initiated brings with it a potential of some negative impact that could be both verifiable and real. We should always be prepared to acknowledge that as a possibility. For us to claim that Alaska's hatchery programs should remain inviolate if the evidence indicates otherwise would not be tenable or intellectually honest. On the other side of the issue, to claim the programs should be dismantled, based on some of the current suppositions circulated as evidence against hatchery production in Alaska, is a contention which ignores the wealth of factual information that disputes those claims and should thus be rejected.

For this meeting, though nominally you're being asked to determine the future of Cook Inlet Aquaculture Association's two pink salmon hatcheries' production, Proposal 43 is a surrogate for a referendum on Alaska's hatchery programs. There are numerous reasons to reject Proposal 43 that are based solely on the proposal and that its passage would likely make those facilities non-viable; however, when you look at the broader context of the intent of this proposal those similar, we ask that once again you lean into science that's not informed by advocacy for your answers and reject Proposal 43 for those reasons, too.

Thank you for the time and care you give to your service to the Board of Fisheries and to all Alaskans. We appreciate the complexity of the decisions before you as a Board and the overwhelming amount of information you must take into account in your process. We rely on you to make those hard decisions using the best of the information available to you, and we hope we have done our part to help make that decision-making process easier.

Regards,

Tina Fairbanks
Executive Director

Citation: Lackey, Robert T. 2013. Normative science. *Terra Magazine,* Oregon State University, Winter Issue, Volume 8(2): 36. http://oregonstate.edu/terra/2013/01/normative-science/

Normative Science

It is easy — and wrong — for scientists to become stealth policy advocates

by

Robert T. Lackey

Scientific information is important in many policy debates in the Pacific Northwest (*e.g.*, salmon; wild fires on public lands; influence of human activities on climate; risks and benefits of genetically modified organisms; and persistent conflict over scarce water). Science is essential in such policy debates, but I am concerned that policy-*biased* science is increasingly common.

Science should be objective and based on the best information available. Too often, however, scientific information presented to the public and decision-makers is infused with hidden policy preferences. Such science is termed *normative* and it is a corruption of the practice of good science. Normative science is defined as "information that is developed, presented, or interpreted based on an assumed, usually unstated, preference for a particular policy choice."

Using normative science in policy deliberations is *stealth advocacy*. I use *stealth* because the average person reading or listening to such scientific statements is likely unaware of the underlying advocacy. Normative science is a corruption of science and should not be tolerated in the scientific community — without exception.

Let me illustrate with a current policy issue: "Should certain dams be removed to restore salmon runs?"

Scientists can assess with some degree of confidence, the likely effects of removing (or maintaining) a particular dam. Scientific information alone, however, is an insufficient justification for removing (or maintaining) a dam. There are biological consequences of dam removal (or maintenance) and those consequences may be substantial from a salmon perspective, but ecological consequences are but *one* of *many* elements that the public and decision-makers must weigh when making a policy choice.

Policy-makers, not scientists, decide whether preserving salmon runs should trump flood protection, irrigated agriculture, or electricity generation. As the public and decision-makers balance policy alternatives, what they need from scientists are facts and probabilities. What they do not need from scientists are their or their employer's values and policy preferences masked within scientific information disguised as being policy neutral.

There are other common examples. In working with scientists, I often encounter value-laden terms like *degradation*, *improvement*, *good*, *poor, impact*, or *alien invasive*. Scientists should avoid these types of normative words in conveying *scientific* information. Such words imply a *preferred* ecological state, a *desired* condition, an *accepted* benchmark, or a *favored* class of policy options. This is not science, it is a form of policy advocacy; subtle, sometimes unintentional, but it is patently stealth policy advocacy.

Consider the widespread use of concepts such as *ecosystem health*? It is normative science! Ecosystem health is a value-driven policy construct, but it is often passed off as science to unsuspecting policy-makers and the public. Think what the average person actually *hears* when scientific data or assessments are packaged or presented under the rubric of ecosystem health. Healthy is good. Any other state of the ecosystem must be unhealthy, hence, undesirable.

Scientific information must remain a cornerstone of public policy decisions, but I offer cautionary guidance to scientists: get involved in policy deliberations, but play the appropriate role. Provide facts, probabilities, and analysis, but avoid normative science. Scientists have much to offer the public and decision-makers, but also have much to lose when they practice stealth policy advocacy.

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The author is professor of fisheries and adjunct professor of political science at Oregon State University. In 2008, he retired from Environmental Protection Agency's Corvallis national research laboratory where he worked for 27 years as a senior scientist and Deputy Director.

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Is Science Biased Toward Natural?

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Citation: Lackey, Robert T. 2009. Is science biased toward natural? *Northwest Science*. 83(3): 291-293.

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Is Science Biased Toward Natural?

Most of us have academic backgrounds in science but such backgrounds rarely prepare us for "real world" natural resource management or policy issues. Science, an alluring comfort zone for most of us, is often an important element in delineating and assessing policy options, but many natural resource issues are controversial, divisive, and litigious. The science itself often becomes part of the policy debate.

In most natural resource issues—for example, managing recreational fisheries with changing climate that does not favor valued species, restoring much-reduced runs of salmon given a rapidly expanding human population, sustaining marine catches given the escalating demand for sea food, protecting at-risk species when little remains of their optimal habitat—science is important. Unfortunately, science is increasingly misused in policy analysis and decision making, even by scientists.

I argue that unless we are more vigilant guarding against the misuse of science in natural resource policy and management, we risk marginalizing the helpful role that science and scientists can play in resolving important, but divisive natural resource issues.

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Precise definitions are important to delineating the proper role of science in policy analysis and decision making. I define *science* as information gathered in a rational, systematic, testable, and reproducible manner. It is not limited to the hypothesis testing frame of the classical scientific method, nor does it preclude disciplines such as astronomy and anthropology. Correspondingly, I define *scientist* as a person who gathers or interprets scientific information (i.e., science). Thus, not all individuals possessing scientific credentials are *working* as scientists even though they may be *identified* as scientists and hold scientific degrees.

An understandable impulse by those of us who work on natural resource issues, including scientists, is to insert our opinion of what we think *should* be the appropriate public policy goal or choice; in short, a tendency to express a personal policy preference. Policy preferences are formed by a mixture of personal values and what the facts are perceived to be. Of course, we often self-select to some disciplines (i.e., fisheries, wildlife, and forestry) because some of us value such environments or animals; thus in our professional lives we tend to be surrounded by others of like mind. It is easy to slip into the mode of "everyone I know thinks that restoring wild salmon is more important than providing hydropower" while failing to recognize that such a view is only one of many competing, often mutually exclusive policy preferences.

Personal policy preferences aside, science deals with the "fact" side of policy. We are usually admonished in university classes to separate our science from our personal policy preferences because policy debates are in large part clashes of conflicting values and competing alternatives. For deciding who wins and who loses (i.e., the political process), science is important, but it is only one element used to select from among competing policy alternatives.

It is often easy to identify when a scientist has shifted from the role of provider of scientific information to the role of advocate of personal policy preferences, but sometimes it is not. At times, even a conscientious scientist may unknowingly advocate a personal policy preference by conveying biased scientific information. For example, how common is the implied policy preference for "naturalness" embedded within what is ostensibly policy-neutral science?

As I read some of the *scientific* literature that comes across my desk, it appears that some scientists tacitly accept the view that natural and undisturbed is *inherently* preferable to altered and disturbed. Thus, it follows that native species are *inherently* more important than exotic species and, therefore, by implication, biological diversity should not be reduced. Knowing what species are native may be essential for testing certain scientific hypotheses, but conveying scientific information with such an *implied* preference is a form of policy advocacy. I offer three examples to illustrate.

First, consider the widely held notion of "ecological integrity." Ecological integrity is, by common definition, based on native species and, by implication, native ecosystems. In the narrowest, legalistic sense, the definition is purely scientific in that it states no implied policy preference. However, use of the word *integrity* connotes "goodness" or "desirability" to most who hear or read it. To the careless user of such scientific information, it easily follows that human activities (altering what is natural) are intrinsically bad or adverse.

I believe it is reasonable to conclude that to most people, if unaltered ecosystems are defined as inherently good (having the highest integrity) and the point of reference for the desired ecosystem condition, then human actions that alter ecosystems must be adverse. Selecting a policy option from among the viable choices is based on values and preferences; the science provided to inform such a choice should not presuppose what those societal values and preferences are.

Consider a second example, the several decades old notion of "ecosystem management" (or its latest incarnation, ecosystem-based management), the hallmark of many natural resource and regulatory agencies nowadays. Terms such as *degradation*, *health*, and *impoverishment* are frequently used in the scientific literature about ecosystem management and they imply that the appropriate or ideal target for ecosystems is a condition with little or no disturbance. By implication, the use of such terms implies that human disturbance results in some degree of *degradation*, something less than *healthy*, and a reduction in biotic *richness*. Thus, the line between science and values has been, if

not completely erased, muddled beyond clear interpretation. The use of such normative concepts as degradation, health, and impoverishment have no place in the scientific literature.

In the scientific literature addressing notions of ecosystem management, the importance placed on the pedigree of the species present in an area also shows a common acceptance of the policy corollary that native species are more important than exotic species. Exotic species may be called *invasive*, but usually their status is less obviously stated. For example, exotic species are routinely excluded in measuring biological diversity. Why are native species more important (policy wise) than exotic species? Further, among exotic species, why are intentional introductions usually treated differently than unintentional introductions relative to biological diversity? Such choices are policy decisions; there is nothing in science that indicates that society will prefer one species over another.

Consider a third example, the scientific literature associated with ecological restoration and, specifically, to what goal or target should we restore. Should ecological restoration be aimed at recreating the ecological condition that existed at the beginning of the Holocene, just prior to 1492, or at the end of last week? The answer requires making a value judgment – a policy choice which is necessarily a political judgment – and it is not a scientifically derived decision. Scientists should assess the feasibility and ecological consequences of achieving each possible restoration target. Selecting from among the choices, however, is a societal enterprise.

In ecological restoration, individuals and society may value certain species more than others, or all species may be valued equally. Such determinations are societal preferences to be made by the public or its institutions, not by scientists working under the guise of technocrats providing policy-neutral facts. Further, whether society prefers "natural and undisturbed" ecosystems to "altered and disturbed" is purely a societal judgment. There is nothing inherent in science that makes either pristine or altered ecosystems inherently preferable from a policy standpoint, nor one restoration target more or less desirable than another.

Without a clear separation between providing policy-neutral science and advocating for personal policy preferences by providing policy-inculcated science, scientists risk being categorized as yet another policy advocacy group. As a group, we will be considered policy advocates who present our arguments in ways that sound like science, read like science, are presented by individuals who cloak themselves in the accouterments of science, but who are actually offering policy advocacy masquerading as science.

In a democracy, having widely available, accurate, understandable, and unbiased scientific information is central to the successful resolution of the typically contentious, divisive, and litigious natural resource policy issue. To allow science to be marginalized through misuse is a major loss to society and its decision making institutions. When performed appropriately and without a policy bias, science has much to offer society, decision makers, and individual citizens. The scientific enterprise also has much to lose by doing otherwise. Our personal bias for natural, no matter how understandable in its origin, has no place in the scientific enterprise.

About the Author:

Dr. Bob Lackey is professor of fisheries science at Oregon State University. In 2008 he retired from 27 years with the Environmental Protection Agency's national research laboratory in Corvallis where he served as Deputy Director among other senior science and management jobs. Since his very first fisheries job mucking out raceways in a California trout hatchery, he has worked on an assortment of natural resource issues from various positions in government and academia. His professional assignments involved diverse aspects of natural resource management, but mostly he has operated at the interface between science and policy. He has published over 100 articles in scientific journals. Dr. Lackey has long been an educator, having taught at five North American universities and continues to teach a graduate course in ecological policy. Canadian by birth, he is now a U.S.-Canadian dual-citizen living in Corvallis, Oregon.

Koniag
3800 Centerpoint Drive
Suite 700
Anchorage, AK 99503

February 12, 2024

Alaska Board of Fisheries

Re: Letter of Opposition – Proposal 43

Dear Alaska Board of Fisheries:

Koniag is a regional Alaska Native Corporation established by Congress under the Alaska Native Claims Settlement Act of 1971. Our region encompasses the Kodiak Island area in the Gulf of Alaska, and we have approximately 4,400 Alaska Native Shareholders. The Alutiiq people of our region have utilized the resources of the ocean for subsistence and commercial purposes for centuries.

Koniag opposes Proposal 43 as hatcheries have played a significant role in supporting robust subsistence, sport, and commercial fisheries in the Kodiak Island region. Proposal 43's proposed reduction in pink salmon production poses a direct threat to the livelihoods and cultural heritage of our indigenous communities in Kodiak Island.

For nearly five decades, hatchery programs have served as a cornerstone of Alaska's fisheries, providing essential support to coastal communities like those in the Kodiak region. These programs not only sustain vital jobs, income, and economic stability but also ensure that salmon remain abundant and accessible for all members of our community, particularly those who rely on subsistence fishing as a cultural tradition and primary source of sustenance.

Furthermore, hatcheries serve as a vital lifeline, alleviating pressure on wild salmon stocks during periods of fluctuating abundance and safeguarding the long-term sustainability of our subsistence fisheries. The responsible management of Alaska's salmon hatchery program, guided by science and stringent regulations, ensures that these practices benefit both commercial and subsistence fishermen alike.

Thank you for considering our perspective on this critical matter. If you have any questions, please contact Tom Panamaroff, Regional & Legislative Affairs Executive (tom@koniag.com).

Sincerely,

Shauna Hegna, President

koniag.com
P (907) 561-2668
F (907) 562-5258

Submitted by: Dwight Kramer
Community of Residence: Kenai, Alaska

Proposals 153 - 159 and 162 OPPOSE.

All of these proposals seek to dissolve protections private anglers appreciate because it allows them some relief from the frenzy of guided boat travel and congestion. Guides, by the nature of their business, have to produce results for their clients so they often times conflict with private anglers who prefer to fish at a more liesurely and enjoyable pace.

Proposal 161 SUPORT. This issue has gained more reverence since there has been more restrictions and closures on the July King fishery. When this occurs the entire guide fleet turns to bank fishing for reds. Many private bank anglers have found themselves displaced or unable to find suitable places to fish because the guide presence extends into the evening hours. Guides are currently allowed to fish 24/7 from the bank. Often times guide companies or lodges will keep shuttling clients to the best fishing locations and tie them up all day and into the evening hours. Currently, there is no time limits or client number restrictions and eventually this will evolve into more anlger conflict. This needs to be addressed because the popularity of the red fishery is growing and conflicts are only going to increase.

Proposal 170 OPPOSE. This regulation was put into effect because this particular stretch of the river was always considered one of the best drift fishing areas for Kings. A conflict arose when to many back trollers started hovering in place and restricted the drift fishermen's ability to utilize this area as they always had.

Proposals 175 - 177 SUPPORT. The intent of these proposals are to reduce the daily bag limit on Coho to 2 fish for the entire season. We do not enumerate Coho in the Kenai River any more and when the runs are weak, as they have been in recent years, going to a 3 fish bag limit after September 1st jeopardizes our chances to have adequate spawning numbers for future sustainable runs.

Kenai River LR King Salmon Management Plan:

During this time of considerable uncertainty to this valuable resource, I am adamantly OPPOSED to removing the OEG, or any attempts to liberalize either the sport or commercial fisheries whenever the preseason or inseason projections fall between the lower floor of the SEG 13,500 and the OEG lower bound of 15,000. For far to long the department has treating the lower bound of the escapement goal range 15,000 like a threshold and started liberalizing the fisheries as soon as it was projected to meet those numbers (i.e. 13,500 and 15,000). Keeping escapements in the lower quartile of the goal range will only further jeopardize any attempts to recover these stocks to sustainable numbers.

I applauded the department for their "Stock of Management Concern" designation toward recovering these LR stocks. I believe it would be prudent to focus efforts towards managing for the mid-range of the goals. We will never gain on our recovery efforts if we don't take a more conservative path.

Proposal 83 SUPPORT. This proposal offers a better method of managing the LR plan in a manner that puts conservation first before opportunity, much in the way that the ER run plan is administered. It starts the season off conservatively and liberalizee when certain parameters are met. It also incorporates higher benchmarks within the OEG range when liberalizations will be permitted. This will ensure more spawning and recruitment potential. This proposal is all inclusive and establishes how and when other fisheries (commercial and PU) would tie into the goal projections during pared restrictions or liberalizations. I would hope that the discussion and directives of this proposal are utilized by the department and the board when formulating any LR plan changes centered on the Stock of Management Concern goals and objectives.

Submitted by: George Krumm
Community of Residence: Estacada, OR

Props 75-93, 96-100, 102, 104, 105, 108, 109. In general, I'm opposed to any plan that would lower or remove the OEG, as lowering the bar accelerates the downward trajectory of Kenai Chinook salmon, our state fish. I think the lower bound of the OEG should be INCREASED to get more Chinook on the spawning beds. I am in favor of Prop 83. Prop 83 is a precautionary, prescriptive approach that is fair to all user groups and gives Kenai Chinook the best chance at recovery. I think a prescriptive, precautionay approach is necessary.

Prop 75. Opposed. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds.

Prop 76. Opposed. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds.

Prop 77. Opposed. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds.

Prop 78. Opposed. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds.

Prop 79. Opposed. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds. Step-down management approach, as used by ADF&G, is part of what go us here. During this time of precariously low abundance, a prescriptive, step-up approach is the only prudent way to manage Chinook.

Prop 80. Opposed. This proposal, if implemented, would further exacerbate the Chinook problem.

Prop 81. Opposed. Forgone harvest of sockeye, can not trump what is essentially an endangered Chinook population. The most constrained stock must be the highest priority. Note: If the setnetters changed their non-selective gear to selective traps, they'd all get rich in time, and the Kenai kings would have a much better shot at recovery.

Prop 82. Opposed. The most constrained stock must come first, meaning it must be the highest management priority. I am against any proposal that seeks to remove or lower the Chinook Salmon OEG for the Kenai River. Lowering the bar is a stategy moves us closer to extinction. On the contrary, we should consider raising the lower bound of the OEG in order to ensure more Chinook get to the spawning beds. The statement saying large kings are "out of the gene pool" is probably untrue. Likewise, stating that the bottom of the OEG is unattainable is patently false.

Prop 83: In favor. This is the most comprehensive, fair, Kenai River Chinook salmon management plan I've ever seen. It is prescriptive by necessity--In the past, non-prescriptive elements gave managers too much latitude to make wrong choices, like allowing an irresponsible "kill any king" fishery despite the data indicating a more conservative action should be taken. It is a "step-up" plan instead of a "step-down" plan, and this is the best way to manage, expecially during times of low abundance. It prevents inadvertently overfishing the stock of concern. It allows for the liberalization of subsistence, commercial, and sport fisheries IF the escapment numbers indicate the fishery should be liberalized. This plan, in my opinion, will be a significant improvement to Kenai Chinook recovery chances.

Prop 84. Opposed. Prop 83 is more comprehensive and much better.

Prop 85. Opposed. There is no science to support the proposer's assertions that I am aware of.

Prop 86. In favor. Prop 83 addresses the bait issue during king season. I would be okay with a bait ban through Oct 31 if the in-river counts continue to be below 15,000 large kings. Coho and pinks can be readily caught without bait.

Prop 87. Opposed. The burden of conservation is being shared. In-river sockeye sport anglers are using gear and methods that result in virtually zero Chinook mortality. If the ESSN's would move to selective gear (traps), they could harvest all the sockeye they want with no impact on Chinook.

Prop 88. Opposed. Resentfully punative and probably not helpful to Chinook recovery.

Prop 89. Opposed. Resentfully punative and probably not helpful to Chinook recovery.

Prop 90. Opposed. THough I support much of what KRSA stands for, I don't think the ideas in the proposal will always work as desired due to tides.

Prop 91. Opposed. Since gillnets are indiscriminate and can catch any salmon that happens into them, paired restrictions are necessary.

Prop 92. Opposed. Stock of Managment Concern must come first.

Prop 93. Opposed. Stock of Management Concern must come first.

Proposal 96. Opposed. Flag gillnets still can't tell the difference between a king and a sockeye. If they really want to fish without killing kings, they need to petition to use traps.

Proposal 97. Opposed. This is essentially an attempt to again "lower the bar," a strategy that further point Chinook towards extinction.

Proposal 98. Opposed.

Proposal 99. Opposed. I believe Prop 83 will be the most effective plan.

Prop 100. Opposed. another attempt at lowering the bar, which will not help with Chinook recovery.

Prop 102. Opposed. The Stock of Management Concern must come first. Foregone sockeye yield is not a valid reason to harvest Chinook unless Chinook are obviously well above 15,000. Do not lower the bar. Instead, move the ESSNs to selective gear, specifically, traps.

Prop 104. Opposed.

Prop 105. Opposed. Overescapment of Sockeye does not trump the most constrained stock int the river--Chinook.

108. Oppposed. This is essentially another attempt to lower the bar and allow Chinook bycatch when the Chinook run is endangered. Let the ESSNs use traps and their problems will soon end. Overescapment of sockeye is not as critical as the endangered king runs.

109. Opposed. Kenai kings are present in this area. Stock of Management concern kings trump an overescapment of sockeye.

Proposal83: Support Proposal 86: Support

Submitted by: David Lisi
Community of Residence: Cooper Landing, Alaska

Proposal # 163 - I am opposed to this proposal. This proposal would actually add to more congestion and safety issues due to the boat launch take out and the critical nature of having to time it so you are not taking out at low tide. With the dramatic changes in Cook Inlet tides, it is critical that guides have the ability to plan their trips around the tides for safety reasons. Having restrictions on hours when guides are allowed to fish not only adds to more congestion, but also diminishes the fishing experience and opportunities for residents. This proposal makes a false claim that "more fish would make passage into crooked creek." There is no scientific evidence to support this claim.

Proposal # 164 - I am opposed to this proposal. This proposal would actually add to the congestion on the river by "bunching" all of the guides to a restricted window; hence, making it impossible for guides to get off the water earlier, opening more bank space for private anglers. This is merely a bandaid that does nothing more than move the problem from one river (the kenai river) to another river (the kasilof river). Shifting the fishing pressure from one body of water to another and then further restricting the area where there is an increase in pressure does not change the number of anglers, it only moves the problem to another "time" of day. We can not get in the habit of trying to regulate our way out of the added popularity of fishing demand on our rivers. the demand is not decreasing, the opportunities to fish are. Regulations should seek to increase the number of opportunities, not limit them.

Proposal #165 - I am opposed to allowing the use of two artificial flies. This opens up the potential for abuses and "skirting" of the law as officers already have enough regulations to enforce. Adding the ability for anglers to use more than one fly will add to the work load of officers in the field who will be tasked with scrutinizing equipment and intentions for use of such equipment [2 artificial flies]. The use of any more than one fly is highly unnecessary on the Kenai River as our fish are opportunistic and anglers generally have no issue catching fish on a single fly.

Proposal #166 - I am opposed to limiting the use of various fishing techniques to target resident species such as rainbow trout and Dolly Varden. This proposed regulation to make this water "artificial fly only" would make the use of plastic "beads" illegal and encourage anglers to use artificial salmon egg imitation flies that have proven to cause unnecessary mortality of resident trout and Dolly Varden that swallow such flies.
Singling out methods and means of targeting native trout species is discriminatory in nature, especially when language such as "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the Resident Species in active spawning areas with methods that disrupt spawning behavior" is used to describe another angler's choice of fishing methods.
I find this language to be inflammatory at best as it calls into question the "ethics" of individual angler's techniques; a judgment that can only be made by an individual angler who is fishing within the guidelines of the law.
I would argue to the person who proposed this examine their choice of methodology of targeting resident rainbow trout by using a motorized vessel to repeatedly motor upstream and drift downstream to target these resident species until you find "the bite" a.k.a. an area where several fish are "biting," even with the use of "artificial flies" can also be considered to be "executing the fishery in a manner that is not consistent with catch and release ethics, targeting and exploiting the resident species in active spawning areas with methods that disrupt spawning behavior." This method of "power trout fishing" is equally as detrimental to the resident trout population.
Once an angler using a motorized vessel finds this area where fish are "biting" they will target this area repeatedly until the fish stop biting. I do not see a distinction between the aforementioned techniques as they are both used to target resident fish in vulnerable stages of their life cycle just after or during an active spawning season.

Proposal #167 - I am opposed to this proposal as it seeks to discriminate against anglers who are deemed to be unethical by other anglers simply by their choice of angling methods that fall within well within the letter of the law.
The use of bait under bobbers has a very significant goal: to specifically target coho salmon in the water where they are most commonly holding, which often is not the same water that resident rainbow trout are frequently found. The use of bobbers an eggs is actually meant to reduce the number of incidentally caught non-target species; further, the use of 2 hooks actually limits the number of rainbow trout that are hooked in sensitive areas such as deep in the throat or in the gills. Those that fish bobbers and eggs know this well, while those who do not understand the technique are not familiar with this method of limiting mortality rates.

If this proposal purports that angers using bobbers and eggs are responsible for mortally wounding or killing resident species, I would like to point out the fact that those opposed to the use of bobber and eggs are actually targeting rainbow trout specifically and use methods more detrimental to these trout.
They agree that there is an "acceptable" mortality rate for catch and release fishing for rainbow trout. For sake of argument, let's say that the mortality rate is 3% for properly handled rainbow trout regardless of methods or means, if an angler incidentally catches 10 rainbow trout while using bobber and eggs unintentionally, they ostensibly may "kill" .3 (that's far less than 1) fish per 10 caught. If another angler, such as the individual proposing this regulation change is actively targeting rainbow trout where the use of "power trouting" or repeatedly fishing a small area over and over because the "bite is hot," they can catch up to 100 rainbow trout and Dolly Varden per day. In this case, with the aforementioned 3% mortality rate, they would kill up to 3 rainbow trout per day. My argument is, who is having a more detrimental effect on the resident rainbow trout given the parameters? I think any reasonable and prudent person would understand that those choosing to use "bobber and eggs" are actually having a very small impact vs. anglers who are specifically targeting and catching up to 100 trout per day

Proposal #168 - I am opposed to allowing the use of two artificial flies. This opens up the potential for abuses and "skirting" of the law as officers already have enough regulations to enforce. Adding the ability for anglers to use more than one fly will add to the work load of officers in the field who will be tasked with scrutinizing equipment and intentions for use of such equipment [2 artificial flies]. The use of any more than one fly is highly unnecessary on the Kenai River as our fish are opportunistic and anglers generally have no issue catching fish on a single fly.

Proposal #169 - I am strongly opposed to any regulation that allows for "hook and hand off" practices for harvesting salmon species. This rule change is disguised as a way to help children, older folks and disabled folks fish, when it actually puts these user groups in a category of "incapable" of hooking their own limit of fish, which is so far from the truth. I would argue that, as a fishing guide, it is my job to exhaust all teaching techniques at my disposal to see that young anglers, elderly anglers and disabled anglers are aided in legally hooking their own fish. I have rarely run across a person that I can not help in this cause. This proposal is a smoke in mirrors attempt for guides to catch and pass fish so that they can quickly catch a limit and get off of the river so they can go pick up their next group of clients. This practice not only makes it difficult for law enforcement to enforce daily limits, it also robs anglers the chance to enjoy the success that comes with learning a technique, hooking their own fish and bringing them to hand. This is lazy guiding and lazy angling and it is not supported by ethical fishing methods and manners of taking as sports men and women.

Proposal #172 - I am opposed to this proposal as the intention is to allow anglers who have caught their limits of coho salmon to continue fishing in order to hook and pass off a fish to another angler. This takes the opportunity away from an individual to hook and catch their own fish. This practice takes away from the experience of an angler who is passed another angler's rod. They know that they, themselves did not hook that fish and part of the joy of fishing is to

hook and catch your own fish. This limits young anglers, senior anglers and handicap anglers opportunity to experience the success of hooking and catching their own fish. Yes they may get a "limit" for the boat, but taking part in that success of ethically catching your own fish is more rewarding than having a limit for the boat.

Proposal #179 - As a resident of Cooper Landing, a fishing guide of 10 years, an outfitter and someone who partakes in the "winter fishery," I can tell you that there is no active, intentional targeting of spawning coho salmon by the vast majority of anglers. Yes, some anglers illegally target these fish; however, they are quickly brought to justice. The use of social media is a great tool to actually catch and prosecute anglers violating the targeting of and removal of coho salmon from the water when the season is closed. There is also immense social pressure amongst fellow anglers to correct these behaviors, warn other anglers about targeting coho out of season. This has led to a decrease in the practice over the years. I say this as someone who not only guides during this window, but spends several days fishing this stretch of water. The false sense that this practice is increasing is the perception that social media brings as more anglers are aware of this happening; whereas, when social media was not as prevalent, many folks were unaware of the occasional violations. With increased awareness by social media, it actually has helped to immediately cease such behaviors instead of it happening "under our noses" prior to the popularity of social media.

Proposal #180 - Similar to proposal 179, I am opposed to this proposal #180 as there simply is no evidence that there is an "uptick" in angling pressure and folks actually targeting spawning coho salmon. It simply does not happen but on an anecdotal level. This is seeking to punish the majority for the acts of a few. These acts of a few have actually been swiftly punished, proving the effectiveness of social media, news media and social pressure by the angling community to curtail such practices.

Proposal #181 - I am opposed to this proposal as it is addressing an "issue" that is actually not an issue at all. I am a resident of Cooper Landing and often fish the portion of this river in question on the Middle River. I would argue that there is actually less angling pressure than there has been historically. This is a section of river that is difficult to access when Skilak Lake is Frozen, Dots Landing is frozen, the river is low and Bing's Landing is iced over (the majority of the time frame in question). Many hearty anglers choose to hike in up to 45 minutes to this spot to recreationally fish for the day. There is no easy access for much of the winter to this section of river. The "appearance" of an increase in usage is anecdotal as this is amplified by social media posts making it seem like there are more people out there than there actually are. It is very possible that 100 anglers use this area per month on average. Prior to the popularity of social media, maybe 5 of these 100 posted pictures of their adventures fishing this section of river. Since the increase in popularity of fishing on social media, of these 100 anglers, if 20-30 post on social media, this would give the false impression that there is an increase of angling pressure, when in fact it is the same amount of pressure (the same historical 100 anglers) This "pressure" seems to be increasing, but it is only increasing in visibility, not in numbers and usage. Awareness of fishing pressure is not the same as an increase in fishing pressure.

Proposal #185 - I agree that the regulations need to be changed to not allow the use of bait on this section of river from January 1st to June 30th annually.

David Lisi

Submitted by: Jon Madison
Community of Residence: Kenai, AK

Proposals 153, 154 155, 156, 157, 158, 159,162-Strongly Oppose. All of these proposals have one goal: Increase Commercial Guiding opportunities on the Kenai River so these businesses can make more money, period. These proposals have nothing to do with conservation, dispersing pressure, or reducing user group conflicts. In fact passing these proposals will have the opposite effect. The non-guided days currently give resident/ local anglers some room and peace on the river from the commercial guide fleet. If theses proposals are passed non-guided anglers/locals will have now have to compete with guides for both boat based and shore based spots 7 days a week increasing conflicts throughout the river.

Proposal 160, 161 Support- The shore based sockeye guiding on the Kenai River banks has become extremely competitive. Due to limited spots for good fishing and public access. Non-guided vs Guided shore based sockeye angler conflict continues to rise every year. I have witnessed commercial guide outfits plant someone before dark to "hold the spot", run multiple rotating groups, only then to release the "spot to a fellow guide, essentially barring anyone else from having an opportunity to fish that "spot" for the bulk of the day.

Proposal 163, 164-Support with amendments- The guided boat to private boat ratio on the Kasilof during the June King season is roughly 90% guided to 10% private. On such a small river often with 60+ guide boats and not many areas to fish it can be frustrating for the private boat to have a pleasant experience, Hour restriction or days of the week on the commercial guide fleet much like the Kenai should be explored

Proposal 166. 167-Oppose Swinging big sculpin fly patterns by fly fishers to these fish is no different than casting a spinner/spoon or a plug. If passed you would be favoring one style of fisherman over another. Please don't discriminate against on style of fishing over another based on false conservation. Either fishing this time of year in this location is harmful to the stock or is not, regardless of the gear used.

Proposal 198-creates a burden/discriminates against those who decide to launch upriver above Warren Ames bridge

Proposal 1: Oppose Proposal 2: Support Proposal 3: Support Proposal 4: Support
Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Oppose
Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Oppose
Proposal83: Support Proposal 84: Support Proposal 85: Oppose Proposal 86: Oppose
Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Support Proposal 90: Support
Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 100: Oppose
Proposal 101: Support Proposal 103: Support Proposal 107: Support Proposal 111: Oppose
Proposal 112: Support Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose
Proposal 125: Oppose Proposal 146: Support Proposal 147: Oppose Proposal 148: Oppose
Proposal 149: Support Proposal 150: Support Proposal 151: Oppose Proposal 152: Oppose
Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose
Proposal 157: Oppose Proposal 158: Oppose Proposal 160: Support
Proposal 161: Support Proposal 162: Oppose Proposal 163: Support With Amendments
Proposal 164: Support With Amendments Proposal 166: Oppose Proposal 167: Oppose
Proposal 168: Oppose Proposal 169: Support Proposal 170: Oppose Proposal 171: Support
Proposal 172: Support Proposal 173: Support Proposal 174: Support Proposal 175: Oppose
Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose
Proposal 180: Oppose Proposal 181: Oppose Proposal 183: Support Proposal 184: Support

Proposal 185: Oppose	Proposal 186: Support	Proposal 187: Oppose	Proposal 188: Oppose
Proposal 189: Support	Proposal 191: Oppose	Proposal 192: Oppose	Proposal 194: Support
Proposal 195: Oppose	Proposal 196: Support	Proposal 197: Support	Proposal 198: Oppose
Proposal 199: Oppose	Proposal 200: Support	Proposal 201: Support	Proposal 203: Support
Proposal 205: Support	Proposal 206: Support	Proposal 208: Support	Proposal 209: Support
Proposal 210: Support	Proposal 211: Oppose	Proposal 213: Support	Proposal 214: Support
Proposal 218: Support	Proposal 226: Support	Proposal 229: Support	Proposal 230: Support
Proposal 231: Support	Proposal 233: Oppose	Proposal 242: Support	Proposal 252: Support
Proposal 255: Support			

PC133

Submitted by: Jon Madison
Community of Residence: Kenai, AK

Proposal 194-Support-I am the writer of this Proposal, unfortunately I will not be able to attend the meeting to testify on my proposal due to work commitments. So here is my best shot to convince you that Dolly Varden/Artic Char should be allowed to be retained in the Kenai/Kasilof Dipnet fisheries. I have no credentials, no department studies, and no scientific data to support my opinions. All I have is my own anecdotal evidence and experiences based off 25 years fishing and dipnetting the Kenai River. If you surveyed users of the river and the managers of the river I feel they would be in agreement of my common sense conclusions. Unfortunately common sense often doesn't pass proposals....science, data, and studies pass proposals and that is why the ADFG opposes this proposal.

There are 3 assumptions with my proposal that prevent it from having a serious chance it at passing:

#1 The Dolly Varden population in the Kenai/Kasilof River is in trouble or a species of concern

#2 People will be apt to target and exploit this new opportunity in the masses.

#3 Dolly Varden survival rates when caught and released in a Dipnet are 100% survival rate.

Addressing assumption #1: the Department claims they do not know the health status/abundance of the stock. This is true, due to budget constraints and the priorities of the department there hasn't been nor do I expect any studies on Kenai River Dolly Varden Stock Status to be conducted. However most anecdotal evidence from commercial fishing guides and private anglers will tell you from their experiences on the river that there is no shortage of dolly varden and most likely in the last 10+ years the population has increased. Few if many dolly varden are retained and killed in the sport fisheries.

The population is doing just fine, the first hand evidence is there if you ask the right people.

Addressing assumption #2: If allowed to retain dolly varden in the dipnet fishery there is an assumption the user group will specifically target Dolly Varden. Dolly Varden are bycatch in this fishery. Very few if any will go out and specifically be targeting Dolly Varden. Additionally fish that are suitable for release most likely will continue to be released at high rates.

Addressing assumption #3: This is the main point of my proposal, In my experience in 20+ years of dipnetting I have probably caught around 100 dolly varden in my boat. My estimate is that the survival rate of these fish released was:

90% percent mortality vs 10% survival.

Why such high mortality rate? The mesh size used on the dipnets is the perfect size for "gilling" these small fish. The netting acts just like a commercial salmon gillnet, often making it impossible to release the fish without heavy bleeding from the gills and deadly entanglement. Yes some of these fish swim off, but if your

involved in any fishery or management of fisheries you have the common sense knowledge to know when a fish is gonna make it or not..90% of these fish do not survive. There will never be a study on this as funds are limited and the species is not of concern to warrant it.

You on the board have heard over and over thru your meetings this frustrating topic of wasted bycatch and what is the actual catch and release mortality rates?...there are so many variables that no one can be certain. I am certain that the mortality rate is extremely high on these dolly varden by-caught in this fishery, thankfully not a lot of dolly varden are actually caught in this fishery overall. It makes no sense to throw these dead fish overboard when people want to take them home for food. This goes against most harvesters and Alaskans universal moral principles of wasting what we kill. Harvesting these fish does not hurt the current in river population because these fish are already dead and will not make the journey upstream. 90% of these fish are being removed from the population regardless of being kept or released.

I will end my testimony with the story that motivated me to write the proposal. Many years ago I took a friend who is an Alaska Native elder from Western Alaska out dipnetting. He pulled in a nice 18 inch Dolly in his net, this fish was badly tangled and bleeding heavily from the gills, we both knew this fish was dead. I informed him he needed to throw the fish back, he questioned me "why would I throw this fish back that is going to die, I will eat him". I told him it was per the regulations and laws. He just shook his head at me in disbelief, stating " your western laws make no sense to me sometimes, and even though they may say so, they are not always right." Those words have stuck with me since, and he was right it makes no sense to waste these dead fish.

Thank you for the work you do. Please support proposal 194.

Jon Madison

PC134

Submitted by: Dane Markham
Community of Residence: Soldotna, AK

I strongly favor the elimination of the OEG.

Proposal 90: Oppose Proposal 106: Oppose

PC135

Submitted by: Michael Markham
Community of Residence: Soldotna, AK

I am in favor of the elimination of the OEG.

I am very much opposed to proposals 90 & 106

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Support	Proposal 150: Oppose
Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose
Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

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PC136

Submitted by: Michele Markham
Community of Residence: Soldotna, AK

I strongly favor the elimination of the OEG.

Proposal 90: Oppose Proposal 106: Oppose

Submitted by: Zachary Markham
Community of Residence: Soldotna, AK

One of the best things that you can do at this time would be to eliminate the OEG.

Proposal 90: Oppose Proposal 106: Oppose

MATANUSKA-SUSITNA BOROUGH
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To: Alaska Board of Fisheries

From: Matanuska-Susitna Borough Fish and Wildlife Commission

Date: February 7, 2024

Re: Comments on 2024 Upper Cook Inlet Finfish Proposals

I. Preamble

The following comments are submitted on behalf of the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC). The MSB FWC represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area the size of West Virginia. Within this area, residents fish commercially, personal use dip net, sport fish, and four indigenous communities were long-time subsistence users — Chickaloon, Knik, Eklutna Village, and Tyonek. The members of the FWC combined bring well over 100 years of experience managing fish and wildlife resources within Alaska.

Proposals were evaluated, and comments generated, based on six (6) goals the FWC established for the upcoming Board of Fisheries UCI meeting:

1. Long-term salmon conservation and protection of salmon habitat.
2. Maintain and enhance the Conservation Corridor in the drift gillnet fishery management plan.
3. Clarify or strengthen conservative management practices which provide protection for current and formerly identified Stocks of Concern.
4. Increase inriver returns of coho and sockeye salmon to Northern Cook Inlet systems.
5. Adjust existing king salmon management plan and strategies to more adequately address conservation concerns for king salmon returning to Northern Cook Inlet drainages.
6. Maintain or extend Personal Use fishing opportunity for Alaskan residents fishing Northern Cook Inlet drainages.

These goals are detailed in the attached publication entitled "It Takes Fish to Make Fish 2024"

MSB Fish and Wildlife Commission Proposal Positions

Process: BOF proposals of interest were evaluated in a designated FWC work group. The recommendations from this work group were then returned to the full commission, where final positions were agreed to by commission consent.

We have ordered our comments to follow the published UCI BOF Agenda dated 1/24/24. The agenda provides the organizational approach the Board will take. In the case of the 2024 UCI BOF Road map, we anticipate some procedural difficulties.

Specifically, until the impacts of Federal management in the EEZ are accounted for within the Central Drift Gillnet Management Plan, it is very difficult to assess the benefits/threats of other proposals affecting Northen bound stocks. The uncertainty and potential threat posed by the EEZ cannot be understated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ is shocking, and when coupled with a lack of timely inseason responsiveness within the Federal management system leaves the Board with little alternative except to apply the precautionary principle to fisheries within their management authority. With that in mind, the MSB Fish and Wildlife Commission recommends:

1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof section to commercial drift gillnet fishing.
2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following: the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor.
3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system. Meaning that a vessel registered for fishing in State waters cannot participate in the Federal EEZ fishery.

Further, we urged in a letter to Board Chairman Wood to consider managing the meeting such that Committee of the Whole Group 6 Central District Drift Fishery Management Plan is placed ahead of Group 2 Northern District Fisheries Management first on the Boards agenda.

II. Matanuska-Susitna Borough Fish and Wildlife Commission Comments on Proposals

Committee of the Whole – Group 1: Kenai River Late-Run King Salmon Action Plan

The MSB FWC encourages the Board to consider limiting pink salmon hatchery production, as called for in Proposal 43, as a means to reduce competition with juvenile king salmon. There is uncertainty in the driver behind the decline of western Alaska king salmon stocks, however, many suggest it is an ocean-related event in the early stages of development. Dramatic declines, as we have seen in Cook Inlet stocks, calls for conservative management actions and application of the precautionary principle. A July 12, 2023 report in Fisheries Management and Ecology, in which a global literature search of peer-reviewed publications (1970–2021) evaluated how hatchery salmonids affected wild salmonids, found that hatcheries commonly have adverse impacts on wild salmonids in freshwater and marine environments. We believe reducing competition by reducing pink salmon hatchery releases, may assist with king salmon recovery.

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Committee of the Whole – Group 2: Northern Cook Inlet Subsistence, Northern District Commercial, Smelt, and Susitna River Sport and Personal Use Fisheries (29 proposals)

Any action taken by the Board in Northern District fisheries can only reasonably be considered after addressing the combined impact of the Federally Managed EEZ and the Central District Driftnet fishery. The emergence of the EEZ and associated estimates of Total Allowable Catch (TAC) cast an unprecedented

level of uncertainty on the sustainability of salmon stocks now subject to two commercial fishing management systems. The situation demands application of the precautionary principle that guides the Board to err on the side of conservation. Therefore, the MSB FWC will generally be opposed to any expansion of harvest potential in the Northern District fisheries and will seek additional conservation-based actions in the state-managed sockeye and coho salmon fisheries within the Central District to counteract the impacts of the federally managed EEZ.

Additionally, we are seeking measures to ensure fish (primarily kings and cohos) that make it into the Northern District are allocated in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users.

Northern Cook Inlet Subsistence

204 Yentna Subsistence Salmon allow use of sport gear No Action

Rationale: Under state law, subsistence has a priority over other users, however this does not mean that all methods are applicable under a subsistence harvest. What does need to be provided is a reasonable opportunity to harvest and does not mean a guaranteed harvest.

If adopted by the Board, a season closure should occur for king salmon conservation based on a Board-identified metric trigger that should be consistently applied to all Northern Cook Inlet subsistence fisheries targeting king salmon during times of shortage. There is also a question regarding the enforceability of a 3 king per family permit.

Northern District Commercial Salmon

205 Close stream mouths to commercial set net fishing in the Northern District Support

Rationale: This proposal will help clarify regulatory language by identifying waters closed to commercial fishing for salmon in the Northen District King Salmon Management Plan permanently rather than by emergency order. Prior actions by the Board to close the sport fisheries in waters of the Theodore, Lewis, and Chuitna rivers in response to them being identified (2011) as SOC. Because the sport fishery is closed under regulation and cannot be opened, the Alaska Department of Fish & Game (ADF&G) is forced to issue an emergency order every year to close these marine waters. Cleaning up the regulatory language by eliminating unnecessary language will benefit the public, ADF&G, and enforcement. This area would only be closed during the directed Northern District king salmon fishery.

206 Reduce from 12.5k to 2,000 the maximum number of king salmon that may be taken annually Support

Rationale: The current cap of 12,500 king salmon (established in 1986) is inconsistent with the current condition of king salmon production and abundance. Current annual directed harvests average only 2,000 per year with an incidental harvest of another 200 – 500 per year taken in the sockeye salmon commercial fishery. This proposal will "right size" management targets to reflect actual stock conditions.

207 Shared Harvests and Paired Restrictions in Northern District King Salmon Management Plan Support Concept

Rationale: The specific allocation directive of the Northern District king salmon management plan calling for a full season of reasonable harvest opportunity for sport, guided sport, and other in river users is not being met. This proposal set a maximum allowable commercial harvest of 15% of the total combined sport

and commercial king salmon harvest and creates paired restrictions on the commercial fishery should conservative actions be taken in the sport fishery.

We recognize the inseason difficultly, however, this would establish a post season report card that helps define the allocative target found within the management plans. We fully support the sharing of the burden of conservation through the paired restrictions.

208 Paired King Salmon Closure of Sport Fishery(s) / Northern District Commercial Fishery (Mat-Su AC Proposal) Support

Rationale: The current management practices are not meeting the standard for managing in accordance with Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users. Prior years of lost opportunity for inriver sport users have not been met with commensurate restrictions in the commercial fishery. Institution of paired restrictions is a time-tested method to attain balance between users, share the burden of conservation, and address allocative decisions by the Board.

209 Close commercial set net fishery by regulation Oppose

Rationale: Management plans, if followed, provide sustainable management and afford a directed allocation established by the Board among beneficial users. We do not favor elimination of a single group when and if salmon abundance allows for a shared benefit. Rather, we are actively supporting Board action to fully implement stated Management Plan purposes; “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” as is CLEARLY established in the Northen District King Salmon Management Plan through additional restrictions (not closure) of the Northern District king salmon commercial fishery.

210 Adopt an abundance-based model for managing the Northern District commercial fishery and additional conservative measures into the management plans for commercial set net fishing Support

Rationale: This proposal elevates the standards for managing the Northen District commercial fishery by adding the Little Susitna River weir to the mix of indicators that ADF&G is obligated to consider and provides specific management targets. It establishes commercial fishing management direction at the mouth of the Little Susitna River based on king salmon and coho salmon abundance as measured at the Little Susitna Weir.

This proposal was submitted in the event the Board may decide NOT to establish a one statute mile commercial fishing closure around Little Susitna River terminus (Proposal 137). If the Board preferred this option, then commercial fishing within one statute mile and up to 500 yards from the river terminus would only be allowed when Little Susitna River weir counts started exceeding established king salmon and coho salmon escapement SEGs, and also when only a small number of sockeye salmon had also migrated past the weir. The sockeye salmon numbers in this proposal are not part of any goal, because ADF&G has not established a Little Susitna River sockeye salmon escapement goal. The purpose of sockeye salmon trigger numbers, in this proposal, is to illustrate: The Little Susitna River sockeye salmon stock is in such poor condition, commercial fishing should likely NOT be allowed to operate within one stature mile of the Little Susitna River terminus with saltwater.

These proposed actions will help correct the disregard for the stated management plan purposes for “providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” and the continued decline of king salmon and coho stocks of the Little Susitna River.

211 Liberalize gear and time restrictions on set net fishing in the Northern District that were adopted as part of the action plan for Stock of Management Concern Susitna sockeye Oppose

Rationale: Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. The current Board-adopted mandate "providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users" is not being met and this proposal will further exacerbate that condition.

Northern District commercial fishing regulations are liberal enough that emergency restrictions or closures of the fishery must occur — every year — to meet ADF&G established salmon spawning escapement goals. Over the past 15 years, reduced abundances of salmon making it upriver has greatly diminished harvest opportunities for Northern Cook Inlet inriver users. Expanding Northern District commercial harvests at this time would exacerbate that problem. In addition, federal management of Cook Inlet has great potential to reduce salmon migration into Northern Cook Inlet.

212 Adopt more conservative measures into the management plans for commercial set net fishing Support Concept

Rationale: This proposal establishes a single 35 fathom net limit from June 25 until closed by EO in the Northern District set net commercial fishery. By establishing commercial regulations at a more conservative level, that remain static for the season, all other users would have a better opportunity of fishing on a proportionally similar harvestable surplus, as commercial users currently do, throughout the entire run. We are unclear as to how, or if, ADF&G can apply the target of 30% of the total Northern District coho salmon harvest limitations as called for in the proposal, other than as a post-season assessment.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to fish at current full strength in the Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northen District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

213 Pair restriction to one set gill net with opportunity for personal use in the Susitna personal use fishery Support Concept

Rationale: This proposal also (see proposal 212) calls for a single 35 fathom net to be legal fishing gear in the Northern District set gillnet fishery. It adds the caveat that if the Lower Susitna Personal Use (PU) Fishery is extended based on abundance of coho and sockeye, then the Northern District fishery may be permitted to use two nets. This proposal seeks to balance opportunity for many Alaskans in the PU and inriver fisheries, with opportunity for a limited number of commercial setnet permit holders. Paired restriction is a common and effective practice within the Board process. This proposal links fishing power within the set gillnet fishery with extended opportunity in the PU fishery for upriver users.

Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet

within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northen District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

214 Pair restriction to one set gill net and time restrictions for commercial set net fishing to increase opportunity to sport fish in Little Susitna and in Susitna personal use fishery Support Concept

Rationale: This proposal addresses the continued frustration of many who fish freshwaters of the MSB and other Northern Cook Inlet drainages. Despite Board-adopted language within section (a) of the Northern Cook Inlet Management plan, "The department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport, guided sport fishermen, and other inriver users a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the number of inseason restrictions, or as specified in this section and other regulations.", a larger share of Northern District coho salmon are currently harvested in the Northern District set gill net fishery with inriver fisheries often experiencing delayed, restricted, or closed harvest opportunities. Limiting the Northern District commercial fishery to one net per permit from June 25 - July 13, and to two set nets per permit from June 14 - 19 should allow more salmon migration into the rivers, during a portion of the season with overall lower salmon abundance levels, better sharing the available early season harvestable surplus between commercial and inriver users. Starting July 20 allowing one set net in the General Subdistrict and up to two set nets in the Eastern Subdistrict is a management strategy the department has used to attain adequate Susitna sockeye salmon escapement ranges, however, this proposal would pair any later expanded Northern District commercial net opportunity with adequate projected salmon to allow the lower Susitna River personal use fishery to continue into August, and also with adequate projected salmon abundance to liberalize the Little Susitna River sport coho salmon fishery. The maximum Northern District commercial nets allowed would be 2 per permit through September 30. Proposed regulation(s) would likely allow more salmon passage into Northern District freshwaters throughout the season and would specifically allow additional coho salmon inriver migration during August and September, and thereby improve inriver salmon harvest opportunities.

131 Add Wednesday as a third regular period for set nets Oppose

Rationale: Until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolved, there is no responsible way to consider liberalizing Northern District commercial fisheries. Greater protections for the Conservation Corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northen District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

Cook Inlet Smelt

216 Reduce the commercial smelt guideline harvest level No Action

217 Repeal the Cook Inlet Smelt Fishery Management Plan No Action

Susitna River Sport

218 Allow harvest of small (under 24 inch) king salmon in portion of the Susitna Drainage when otherwise closed Oppose

Rationale: This proposal would allow the harvest of small male (between 20 and 24 inches) king salmon in Unit 4 of the Susitna drainage. It is unclear the way the proposal is written what the daily and seasonal limit would be, making it difficult to fully evaluate. 20-24" king salmon are predominantly male and

contribute little to the viability of the spawning escapement which is far more influenced by the number of large female kings. Allowing a limited number of 20-24" king salmon for harvest would not likely jeopardize the productivity of the return. However, the way the proposal is drafted we cannot support it.

219 Close fishing for all species within confluence areas of Park's Highway streams and Susitna when fishing for king salmon is closed **Defer to ADFG**

220 Open additional waters to sport fishing for coho in Big River Drainage **Defer to ADFG**

221 Increase daily bag and possession limit for coho salmon back up to three a day and in possession from two **Defer to ADFG**

Rationale: Under current management authority and when coho stocks reach an abundance to support a 3 fish limit ADF&G currently has the authority to increase the limit from 2 to 3 or higher. This proposal speaks to the frustration that Susitna drainage sport fishermen have with respect to the chronic pattern of ignoring the Board mandated directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." Reestablishing a 3 fish bag limit can be accomplished if restrictions in the Central District Drift gillnet fishery occur as well as those called for in the Northern District Commercial Fishery. Such changes could logically deliver more coho to Northern District streams and therefore allow the reinstatement of an additional fish to the bag limit.

However, until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolve there is no responsible way to consider liberalizing Northern District commercial fisheries as some have called for. Greater protections for the Conservation corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northen District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

222 Allow harvest of six pink salmon per day in addition to bag limit for chum, sockeye and coho within the Susitna River Drainage **Support**

Rationale: Pink salmon are the most abundant salmon in the Susitna River drainage and as such can provide additional harvest opportunity for those who wish to take them.

223 Special management areas for rainbow trout in Susitna **Oppose**

Rationale: This proposal would add the Susitna River, from Alexander Creek to Devils Canyon from Sept 15 – May 15 to the waters managed under catch and release special management restrictions that include no bait. Stocks in this river section are not reported to be a declining condition and the waters proposed for Special Management have not had a management history that would meet necessary criteria for selection and management as a Special Management water. Numerous other fisheries are currently under special management designations and therefore address the demand for diverse fishing opportunities.

224 Special management areas for rainbow trout in Susitna **Oppose**

Rationale: See comments for proposal 223.

225 Increase harvest of rainbow trout **Oppose**

Rationale: This proposal seeks to increase harvest opportunity for rainbow trout to reduce their presumed predatory impact on depressed salmon stocks. There is no precedent in management or scientific evidence to support the assertions that rainbow trout predation is somehow linked to depressed salmon populations. To increase harvests will necessarily diminish the quality of the rainbow trout recreational fisheries.

226 Dropper flies **Oppose**

Rationale: This proposal seeks to allow two flies to be used in tandem (dropper) and rightly points out that this is common gear in most trout waters of the American west. However, missing from those waters are salmon and the potential affect that adding gear to the fishery may have on catch rate of other species is of concern.

227 Increase harvest of Dolly Varden **Defer to ADFG**

Susitna River Personal Use

228 Close dipnetting in the vicinity of Anderson Creek during the personal use fishery on the lower Susitna River **Support**

Rationale: This is an ADF&G proposal that provides necessary protection for Anderson Creek coho which are susceptible to over harvest if targeted in the Susitna River personal use fishery. ADF&G considers this a housekeeping measure following the establishment of the personal use fishery in 2020.

229 Add two days per week to dipnetting in the lower Susitna River personal use dip net fishery **Support**

Rationale: There have been numerous allocative proposals before the Board to take actions that allow inriver users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board, this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through Emergency Order (EO) should a lack of abundance dictate a conservative action be taken.

230 Add day per week and extend date during which the personal use fishery in the lower Susitna River is open **Support**

Rationale: There have been numerous allocative proposals before the Board to take actions that allow inriver users the opportunity to harvest sockeye and coho salmon. Depending on the prior actions of the Board, this proposal is a viable option to redistribute opportunity to Alaskans who would like to harvest salmon for personal use. The fishery would remain managed through EO should a lack of abundance dictate a conservative action be taken. It is anticipated that this additional time would result in a minimal increase in PU harvest.

231 Shift the dates during which the personal use fishery in the lower Susitna River is open later by one week (Matanuska-Susitna Borough Fish and Wildlife Commission Proposal) **Support**

Rationale: Management plan intent is clear: “in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users” to harvest these resources over the entire run. The board created this fishery with conservative opportunity during the last board cycle. Personal use harvests have been modest during the first three years of this fishery and harvest data indicates the first Saturday and Wednesday (up to one third of the

annual personal use harvest opportunity in this fishery) occur before there are many salmon available for harvest. Harvest data and ADF&G Susitna River drainage fish wheel and weir data indicate better abundance of the 4 salmon species open to harvest in this fishery later in the season. Shifting to a later opening will enhance harvest opportunity in the PU Fishery.

Committee of the Whole – Group 3: Cook Inlet Areawide Sport Fisheries, Knik River Area Sport Fisheries, and Anchorage Area Sport and Personal Use Fisheries (24 Proposals)

Cook Inlet Areawide Sport Fisheries

232 Allow Alaska residents to buy more than one sport fishing license and take additional daily bag limits **Oppose**

Rationale: Alaska sport fishing regulations and management systems have effectively regulated seasons, bag limits, methods and means for decades. Additional licenses are not necessary to realize additional harvest under the current system. Bag limits can be adjusted when warranted and seasons can be extended. The parallel drawn by the proposer with permit stacking in the commercial fishery is misplaced.

233 Establish additional criteria for sport fish derby **Oppose**

Rationale: This proposal seeks to require specific stock assessment programs take place in advance of approval for a sport fishing derby. These factors are already considered within the approval process and there is no history of an approved derby contributing to a stock decline.

Knik River Area Sport Fisheries

234 Clarify the northern boundary of the Knik Arm Management area and the Palmer Wasilla Zone and exclude certain flowing waters from the Palmer-Wasilla Zone (ADF&G Proposal) **Support**

Rationale: Northern pike have become prolific in certain flowing waters within the Palmer-Wasilla Zone, but springtime closure of flowing waters within the zone designed to protect spawning rainbow trout also protect northern pike in certain waters where they have taken a stronghold. Excluding certain flowing waters where northern pike exist would increase northern pike harvest in those waters.

235 Reduce size of the Palmer-Wasilla Zone **Support Concept**

Support Concept but refer to Proposal 234.

Rationale: Waters of the Palmer – Wasilla zone has an April 15 - June 14 closure to protect spawning rainbow trout, however a portion of this closure area now may be primarily infested by invasive northern pike (similar to Proposal 234), with few significant populations of rainbow trout remaining to utilize flowing waters. This portion of the season could provide an opportunity to remove more invasive northern pike with little insignificant impact on rainbow trout in a specific portion of the current Palmer- Wasilla zone. If the Board moves forward with this proposal we recommend amending it to specify non-retention of species other than northern pike.

236 Bookkeeping by ADFG **Support**

Rationale: This proposal updates the stocked lakes list for the Knik Arm drainage. Stocking has been discontinued in one lake and newly initiated in several lakes. Without action, anglers may miss the benefit

of greater bag limits for stocked waters and enforcement would not be able to monitor fisheries appropriately.

237 Allow bow and spear for Northern Pike and Blackfish Support

Rationale: Invasive northern pike and Alaska blackfish have been found and documented in various waters in the Knik Arm and Susitna River drainages, several of which fall in the "Palmer-Wasilla Zone Flowing Waters" management area. This management area is open to fishing June 15 - April 14, which excludes the spawning season for rainbow trout, as well as that of northern pike. This denies an excellent opportunity for selectively harvesting northern pike with a bow-fishing setup when they are in shallow waters for the spring spawn, and tend to allow people to approach more closely. We question inclusion of Blackfish in an archery and spear proposal. Blackfish are very small fish averaging approximately 4", some have been reported larger up to 13". We are unaware of a fishery in the MSB focused strictly on Blackfish.

238 Establish a motor size restriction for the Little Susitna River, no size suggested No Action

Rationale: We took no action on this proposal as we believe it needs more discussion. With the knowledge we have of the impact on rivers experiencing large number of users navigating with boats equipped with large horsepower motors there may be a need for limitations in the Little Su as have been adopted for high use waters of the Kenai.

239 Adopt a large fish escapement goal for king salmon on the Little Susitna (no suggested size for large fish offered) Support Concept, but Defer to ADFG

Rational: Large fish escapement goals for king salmon more precisely address escapement goal development and stock productivity. Where the technology to monitor and the data exist, establishment of large fish escapement goals for king salmon are a preferred management tool.

240 Increase the time during which bait can be used in the Little Su to from July 13 and not from August 5 Oppose

Rationale: ADF&G already has the authority to regulate the use of bait through their EO authority.

241 Pair use of bait in Little Su to openings in Northern District set net fishery Oppose

Rationale: This proposal speaks to the frustration in-river users are expressing over the chronic disregard in management practice ignoring the Board mandated directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." We do not think this approach is practical, but we understand the frustration and urge the Board to look to other proposal vehicles to address this valid concern.

242 Prohibit catch and release of coho salmon in the Little Susitna downstream of the weir at all times and mandate retention Oppose

Rationale: ADF&G has deemed the regulations governing this fishery and the practice of catch and release specifically to be sustainable. Unnecessarily limiting opportunity as proposed is detrimental to the sport fishing public who utilize these waters.

243 Restore bag and possession limit of three coho, up from two Defer to ADFG

Rationale: Under current management authority and when coho stocks reach an abundance to support a 3 fish limit ADF&G currently has the authority to increase the limit from 2 to 3 or higher. This proposal speaks to the frustration that Knik Arm drainage sport fishermen have with respect to the chronic pattern of ignoring the Board mandated directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users." Reestablishing a 3 fish bag limit can be accomplished if restrictions in the Central District Drift gillnet fishery occur as well as those called for in the Northern District Commercial Fishery. Such changes could logically deliver more coho to Northern District streams and therefore allow the reinstatement of an additional fish to the bag limit.

However, until the impact of the combined drift gillnet harvests in Federally managed EEZ and state managed waters are resolve there is no responsible way to consider liberalizing Northern District commercial fisheries as some have called for. Greater protections for the Conservation corridor and further restrictions on the drift fleet within the harvest corridor are essential to any changes in the Northern District. Consistent with that strategy is the importance to manage the Northen District commercial fisheries conservatively until the impacts of the liberalized fishing of the EEZ are known.

244 Clarify boundaries of Fish Creek mouth (ADFG Proposal) Support

Rationale: Regulatory markers posted at the mouth of Fish Creek do not adequately delineate fresh vs. salt water because the markers, due to large tidal fluctuations, must be posted at a higher elevation, well upstream of mean low tide that distinguishes fresh from salt water in statewide regulations. Special regulations that restrict salmon harvest in the Fish Creek sport fishery to three salmon per day, of which only two may be a coho salmon and limit fishing to weekend only, currently do not conserve salmon caught within the Fish Creek channel downstream of the markers where sport fishing under saltwater regulations is allowed seven days per week, with six salmon allowed per day. Returning to the definition for fresh waters given in statewide regulations, and adding a quarter-mile radius to the freshwater determination, will ensure special regulations developed for Fish Creek salmon conserve all salmon entering the Fish Creek channel that are bound for Fish Creek.

245 Increase opportunity to sport fish for salmon in Fish Creek No Action

Rationale: We look forward to the ADF&G comments as they will help inform us on how we ultimately respond to this proposal.

246 List lakes where anglers can use up to five lines for NP (ADFG Proposal) Support

Rationale: Northern pike are a predatory fish invasive to Southcentral Alaska and can pose a significant threat to salmon and resident fish species in the region. To encourage anglers to harvest northern pike, systems that primarily contain northern pike have regulations allowing anglers to use five lines through the ice. Expanding that list to include the proposed waters may encourage anglers to fish these areas and harvest northern pike. Northern pike were eradicated from Anderson Lake and this lake can now be removed from the list.

247 Prohibit chumming in specific waters (ADFG Proposal) Support

Rationale: Regulations prohibiting use of bait during the ice fishery on Big Lake are difficult to enforce. Determining whether an angler is using bait or an attractant on the hook while chumming is difficult; an angler may be scenting hooks under the guise of chumming to attract fish.

248 Catch and release on Char in Fish Creek drainage (ADFG Proposal) Support

Rationale: Review of Statewide Harvest Survey (SWHS) data shows a decline in the abundance of Arctic Char, particularly of large fish over 20 inches in length. Non-retention would maximize recruitment into mature age classes and maximize spawning events to help rebuild the stock. ADF&G has been issuing EO's to restrict sport fishing for Arctic char in Big Lake to catch-and-release only for the past two calendar years.

Mirror and Flat lakes have direct connections with Big Lake, allowing migration and sharing of fish between lakes. Resident species such as Arctic Char and burbot in Big Lake are no longer protected by conservative regulation when they migrate to neighboring Mirror and Flat lakes.

249 Bookkeeping by ADFG Support

Rationale: This proposal updates the stocked lakes list for the Knik Arm drainage. Stocking has been discontinued in one lake and newly initiated in several lakes. Anglers may miss the benefit of greater bag limits for stocked waters and enforcement would not be able to monitor fisheries appropriately.

Anchorage Area Sport Fisheries

250 Modify closure date for Ship Creek No Action

251 Reduce opportunity to harvest salmon in Eklutna drainage Defer to ADFG

252 Restore bag and possession limit of three coho, up from two Defer to ADFG

253 Dropper flies Oppose

Rationale: This proposal seeks to allow two flies to be used in tandem (dropper) and rightly points out that this is common gear in most trout waters of the American west. However, missing from those waters are salmon and the potential affect that adding gear to the fishery may have on catch rate of other species is of concern.

254 Add Chester Creek to special management waters for trout No Action

255 Create a personal use dip net fishery for salmon in the 20 Mile and Placer Rivers Defer to ADFG

Rationale: Concerns with potential for overharvest; ADF&G comments would also help here. However, both the 20 mile and Placer Rivers are located on the road system within 58 miles of Alaska's largest community. These systems support small returns of salmon and currently support a directed and at times large salmon sport fishery. It is our opinion that these systems would have difficulty supporting a personal use dip net fishery.

Committee of the Whole – Group 4: Stock of Concern – Kenai River Late Run King Salmon Management Plan, Kenai River King Salmon, Upper Cook Inlet Salt Water King Salmon Sport Fishery Plan (46 Proposals)

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Committee of the Whole – Group 5: Sockeye Salmon Management Plans (8 Proposals)

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Committee of the Whole - Group 6: Central District Drift Gillnet Fishery Management Plan, Fishing Districts and Gillnet Specifications and Operations, Pink Salmon Management Plan, Hatchery Production, Upper Cook Inlet Management Plan, West Cook Inlet Salmon (25 Proposals)

Central District Drift Gillnet

121 Repeal intent language that has guided regulatory development of drift fishery since 1990's and replace with language that favors harvest by drift fishery Oppose

Rationale: Allocation of salmon resources for the benefit of Alaskans rest with the Board of Fisheries. Decisions to place the statement "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users" on the use of these common property resources takes into account the number of beneficial users and the impact to state and local economies. Preferences provided in the current plan address those considerations. The only change necessary to fully implement these directives are more deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District, and are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quicky to implement conservative actions in state managed waters. The commission recommends: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor, and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ are shocking and when coupled with a lack of timely inseason responsiveness within the Federal management system leaves the Board with little alternative except to apply the precautionary principle to fisheries within their management authority.

122 Repeal the 'one percent rule' in the Central District drift gillnet fishery Oppose

Rationale: Maintaining the 1% rule is important to implement the management directive "in accordance with stated Management Plan purposes, providing a full season of reasonable harvest opportunity for sport, guided sport, and other inriver users" for coho salmon moving through the Central District bound for the Northern District. A predictable and managed end to the commercial fishery is essential in meeting this Board approved mandate.

More deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever. With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quicky to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters

west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

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123 Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans **Oppose**

Rationale: See comments for proposal 122.

124 Repeal the "one percent rule" from Upper Cook Inlet commercial salmon fishery management plans **Oppose**

Rationale: See comments for proposal 122.

125 Repeal sections of the CDDGFMP to provide additional commercial opportunity for drift fishery **Oppose**

Rationale: See comments for proposal 121.

126 Increase drift gillnet fishing opportunity in Drift Gillnet Area 2 **Oppose**

Rationale: See comments for proposal 121.

127 Increase time for Drift Fishery to two 12 hr. openings inlet wide and one 12 hr. opening in 6-mile corridor each week **Oppose**

Rationale: See comments for proposal 121.

Fishing Seasons, Weekly Periods, Set Gillnet Gear, and Registration

128 North K Beach shall fish with both Kasilof and Kenai **No Action**

129 Allow North K Beach to fish early with Kasilof openings **No Action**

130 Lengthen set net season through end of August **No Action**

132 Add Wednesday as a third regular period for set nets **Oppose**

This proposal does not take into consideration area and time where fishers will be fishing. It addresses all gear types and all fishing areas within Upper Cook Inlet. It is also only takes into consideration escapement requirements for sockeye destined to the Kasilof and Kenai Rivers.

Given the uncertainty if the impact of the EEZ and current challenges with moving salmon to the Northen District additional regular fishing periods should not occur. The additional fishing power is unwarranted and will disrupt the biological and allocative benefits of Windows incorporated into existing management plans. This proposal does not take into consideration area and time where fishers will be fishing. It addresses all gear types and all fishing areas within Upper Cook Inlet. It is also only takes into consideration escapement requirements for sockeye destined to the Kasilof and Kenai Rivers. More deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quicky to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ are shocking and when coupled with a lack of timely inseason responsiveness within the Federal management system leaves the Board with little alternative except to apply the precautionary principle to fisheries within their management authority.

133 If set nets do not fish at least 2 12's a week then other fisheries must be closed or restricted "equally" No Action

134 Commercial fisheries must fish at least 2 days per week Oppose

Rationale: This proposal would establish two 12-hour Inlet wide fishing periods regardless of run size or status by repealing restrictions that have been designed to provide for terminal stock fisheries management, distribute fishing opportunity across all users and provide for sustainable returns to inland waters. Inlet-wide fishing results in indiscriminate mixed-stock harvests and does not take into account the differing run strengths and productivity levels of stocks that make up these mixed stock fisheries.

The Board moved past this old system when they established the harvest corridor and intentionally used it to target Kenai and Kasilof sockeye effectively. This restricts drift fishing in the conservation corridor, allowing for the passage of Northen-bound stocks.

More deliberate efforts to manage the commercial fishery in the Central District Drift Gillnet fishery for fish passage to the Northern District are warranted now more than ever.

With the pending implementation of Federal Management in the EEZ and the attendant increases in harvest potential it is imperative that the Board move quicky to implement conservative actions in state managed waters. We strongly favor: 1) Area 1. Close ALL state managed waters in the Anchor Point Section and all state waters west of the expanded Kasilof to commercial to drift gillnet fishing. 2) Confine all state managed drift gillnet fisheries to the harvest corridor using one or more of the following; the Kasilof section, Expanded Kasilof Section, Kenai Section, and/or the Expanded Kenai Section of the Harvest Corridor and 3) Consider the possibility of placing state managed waters as defined in 2 above under a Super Exclusive fishery management system.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

135 Close Chinitna Bay Subdistrict to commercial fishing for salmon No Action

136 Prohibit commercial drift fishing within 1 mile of mouth of Silver Salmon and Shelter creeks Support

Rationale: This proposal seeks to create a 1-mile buffer around the mouths of Silver Salmon and Shelter Creeks in an effort to conserve coho salmon. This is a commonsense proposal that is similar to others around the state that protect mouths of streams from creek robbing.

137 Add Susitna and Little Susitna Rivers to the list of waters in the ND where commercial fishing is prohibited within one statute mile of the terminus. Support

Rationale: Area protections have long been used in fisheries around the state to prevent river and creek mouths from being corked off. This is a commonsense proposal that will have lasting conservation benefits.

The uncertainty and potential threat from Federal salmon management within the Cook Inlet EEZ cannot be overstated. Current discussions regarding Total Allowable Catch (TAC) within the EEZ are shocking and when coupled with a complete lack of inseason responsiveness within the Federal management system leaves the Board with no alternative except to apply the precautionary principle to fisheries within their management authority.

138 Allow use of a seine lead in the set net fishery and redefine minimum distance between gear No Action

139 Allow reef nets No Action

140 Allow reef nets No Action

141 Direct or incentivize use of 29 mesh depth gill nets in the upper subdistrict at all times (KRSA Proposal) No Action

142 Require that jack king salmon be recorded on fish tickets Defer to ADFG

143 Allow Upper Cook Inlet set gillnet permit holders to fish in more than one registration area per year Oppose

This proposal would drastically increase fishing power within the set gillnet fleet and increase interception of Northern District salmon stocks which will drastically alter the allocation of salmon resources addressed by current management plans.

<u>Hatchery Production</u>

43 Reduce hatchery production Support

The MSB FWC encourages the Board to consider limiting pink salmon hatchery production, as called for in Proposal 43, as a means to reduce competition with juvenile king salmon. There is uncertainty in the driver behind the decline of western Alaska king salmon stocks, however, many suggest it is an ocean related event in the early stages of development. Dramatic declines as we have seen in Cook Inlet stocks calls for conservative management actions and application of the precautionary principle. A July 12, 2023 report in Fisheries Management and Ecology in which a global literature search of peer-reviewed publications (1970–2021) evaluating how hatchery salmonids affected wild salmonids, found that hatcheries commonly have adverse impacts on wild salmonids in freshwater and marine environments. We believe the reducing competition by reducing pink salmon hatchery releases, may assist with king salmon recovery.

Pink Salmon

144 Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation **Oppose**

145 Add commercial fishing time for set and drift to target pink salmon, no mention of king salmon conservation or allocation of coho salmon **Oppose**

Committee of the Whole – Group 7: Kasilof King Salmon Sport Fisheries, Vessel and Habitat Restrictions, and Guides (15 Proposals)

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Committee of the Whole- Group 8: Kenai, Kasilof, and Russian River – Sport and Personal Use (39 Proposals)

The MSB Fish and Wildlife Commission elected to not address this group of proposals.

Andrew N. Couch

MSB Fish & Wildlife Commission Chair, Andy Couch

PC138

It Takes Fish To Make Fish

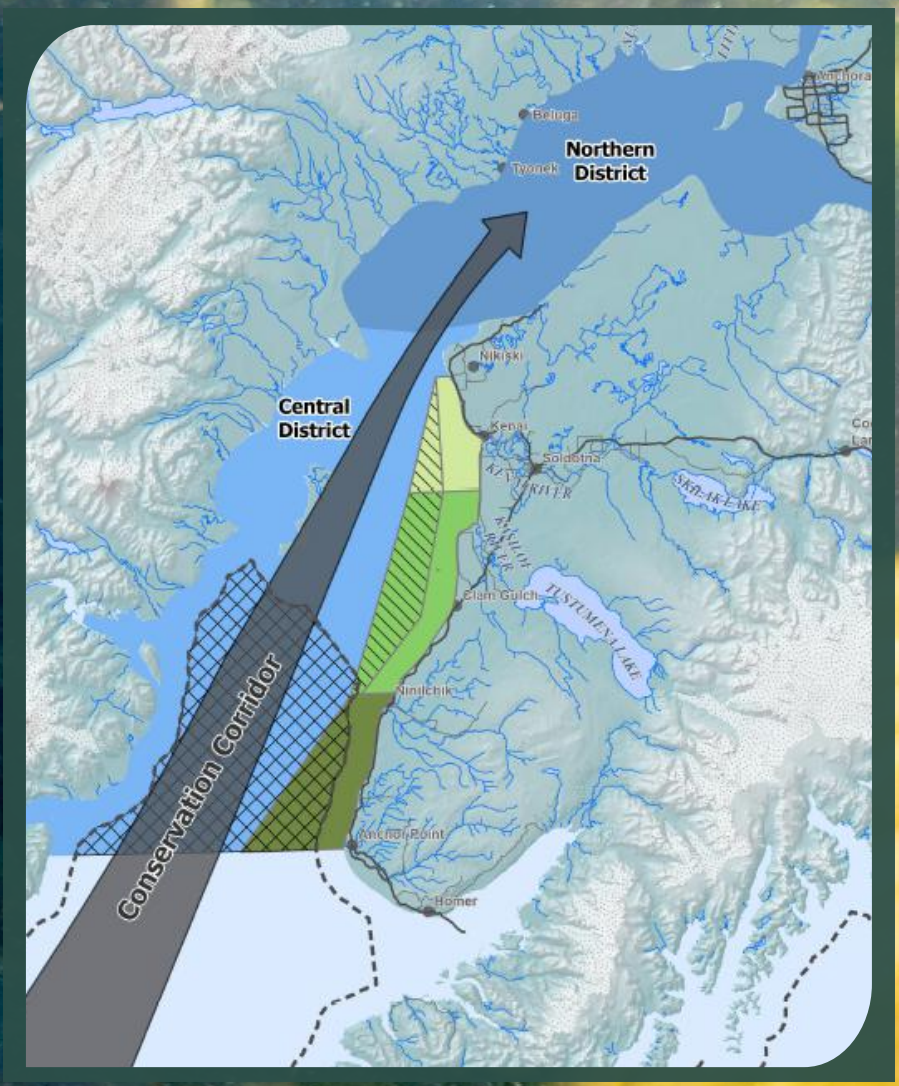

Photo Credit: Fernando Lessa

Matanuska-Susitna Borough
Fish & Wildlife Commission

2024

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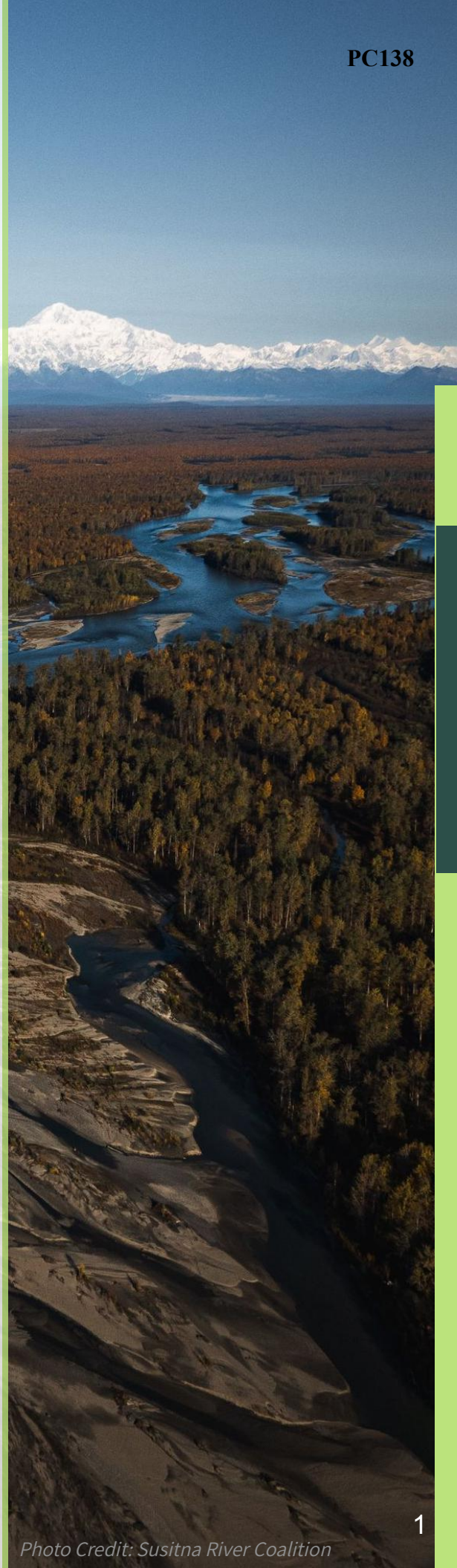


Photo Credit: Susitna River Coalition

Photo Credit: Stefan Hinman

PC138

Commissioners, from left to right: Howard Delo, Gabe Kitter, Peter Probasco, Andy Couch, Jim Sykes, Kendra Zamzow, Larry Engel. Not pictured: Tim Hale and Bill Gamble

The Mat-Su Borough Fish & Wildlife Commission was created to advise and make recommendations to the Assembly, Borough Manager, and/or any state or federal agencies, departments, commissions, or boards possessing jurisdiction in the area of fish, wildlife, and habitat on the interests of the borough in the conservation and allocation of fish, wildlife, and habitat.

- A 9-member volunteer board, appointed by the MSB Mayor, including two MSB Assembly members

- Members have pertinent expertise, some with decades of Alaska BOF service, and well over 100 years of combined expertise as State biologists, fishing and hunting guides, and other high level conservation and research-based careers.

- While engaging local citizens in fish and wildlife issues, the FWC/MSB has directed over $20 million in Borough, State, and Federal appropriations towards improving fisheries research, management and fish passage.

Photo Credit: Jonny Armstrong

PC138

This booklet was developed to inform and educate the public and decision makers about fisheries concerns that residents have with fisheries in both fresh and saltwater in Upper Cook Inlet and the streams that feed it.

Challenges:

- Declining king salmon populations over the past 15 years.
- Lack of scientific data regarding all salmon stocks.
- Lack of genetic data concerning stream origin of coho salmon.
- Interception of returning salmon by commercial fisheries throughout Cook Inlet.
- A higher number of Stocks of Concern than any other area in Alaska.

Management Concerns Relating to Unique Geography of Cook Inlet:

- Northern-bound salmon primarily swim through the center of the inlet when migrating through a mixed-stock fishery. They need to be protected from commercial overharvest.
- Management of Cook Inlet commercial fisheries revolves around one major stock of sockeye salmon. Many smaller stocks can be severely impacted if fishing time and area are not tightly controlled. More attention should be given to these smaller stocks.
- Significant differences exist in the productivity of the Cook Inlet's salmon stocks. Fishing pressures on these diverse stocks needs to be acknowledged when allowing harvest.
- A better forecasting method for identifying salmon run strength needs to be developed to aid in managing Cook Inlet fisheries.
- The potential Federal takeover of salmon management in the Federal waters of Cook Inlet creates a huge unknown for the future of salmon runs to the Northern District.

Efforts & Accomplishments:

- Establishing a “Conservation Corridor” through the middle of the inlet, allowing additional salmon to migrate past the drift fleet and into Northern District waters.
- Expanding the limited personal use fisheries in the Northern District.
- Reducing drift gillnet fishing times in specific areas.
- Securing funding for coho salmon genetics studies.
- Securing funding for weirs and enumeration counts of returning salmon.
- Expanding commercial fishing areas on the east side of the Central District in Cook Inlet.

The greatest success so far has been establishing and maintaining the Conservation Corridor. The Corridor has successfully pulsed more fish through the commercial drift fleet and into northern waters, allowing Northern salmon to return to their natal streams to spawn. **The Fish & Wildlife Commission is dedicated to maintaining the regulations currently supporting the Conservation Corridor and enforcing conservative fishery management for the Northern District in the future.**

COMMISSION GOALS

1. Long-term salmon conservation and protection of salmon habitat.
2. Maintain and enhance the Conservation Corridor in the drift gillnet fishery management plan.
3. Clarify or strengthen conservative management practices which provide protection for current and formerly identified Stocks of Concern.
4. Increase inriver returns of coho and sockeye salmon to Northern Cook Inlet river systems.
5. Adjust existing king salmon management plans and strategies to more adequately address conservation concerns for king salmon returning to Northern Cook Inlet drainages.
6. Maintain or extend personal use fishing opportunity for Alaskan residents fishing Northern Cook Inlet drainages.

Photo Credit: Jonny Armstrong

THE CONSERVATION CORRIDOR
Management That Works

The Conservation Corridor concept provides for a more conservative approach to fisheries management. It is the practice of closing commercial fishing, except in nearshore "terminal" fishing areas, called harvest zones, to allow fish heading to northern streams to pass. The concept builds off of the highly successful terminal stock fisheries management program in Bristol Bay and, in our case, is designed to enable commercial fishermen to target Kenai and Kasilof sockeye closer to shore. It considers the unique geography of Upper Cook Inlet and the complexity of a commercial mixed-stock fishery, ensuring the Inlet's less productive salmon stocks and northern-bound coho and sockeye pass through the Central District to reach their spawning grounds in Northern District drainages.

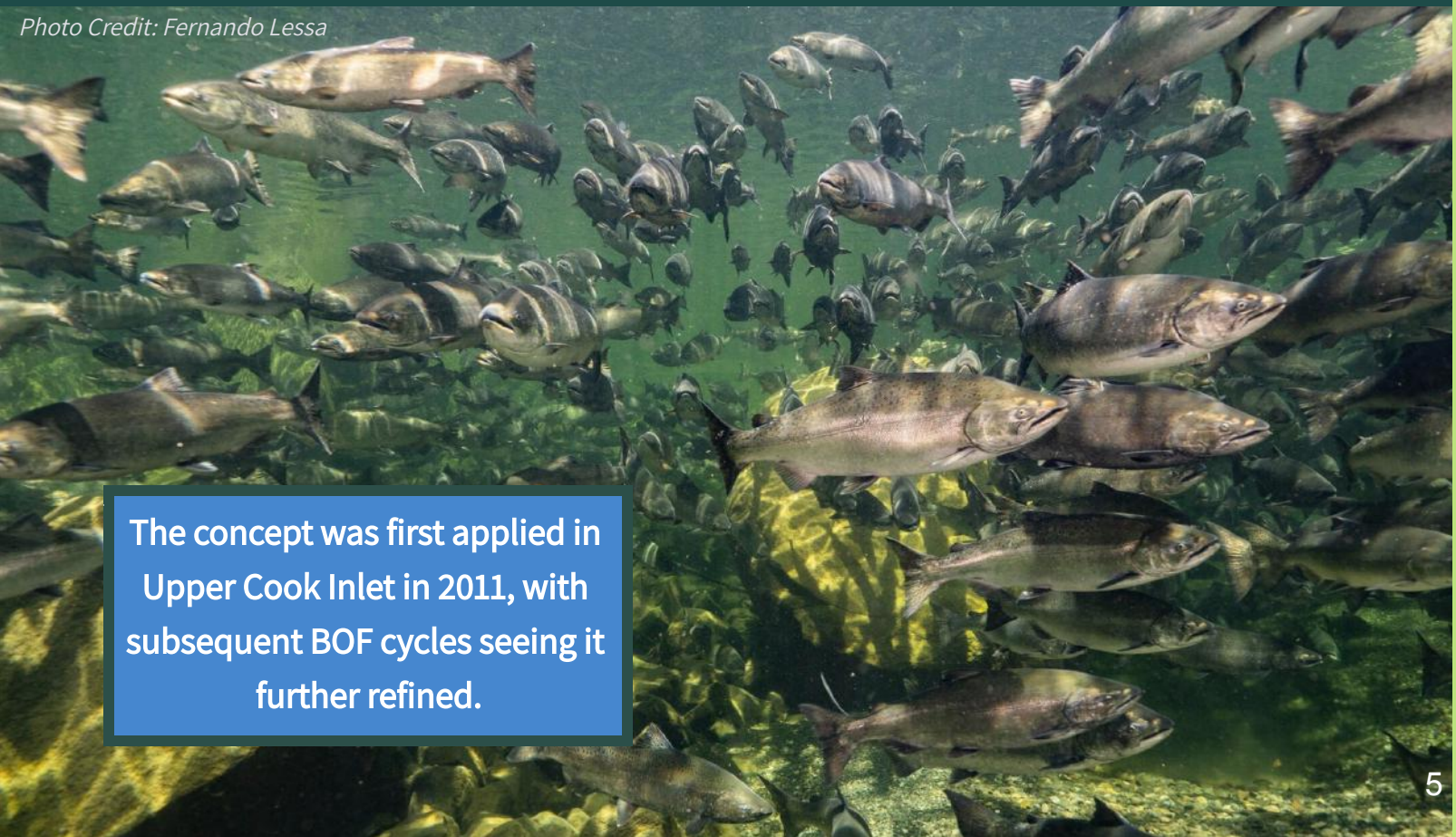
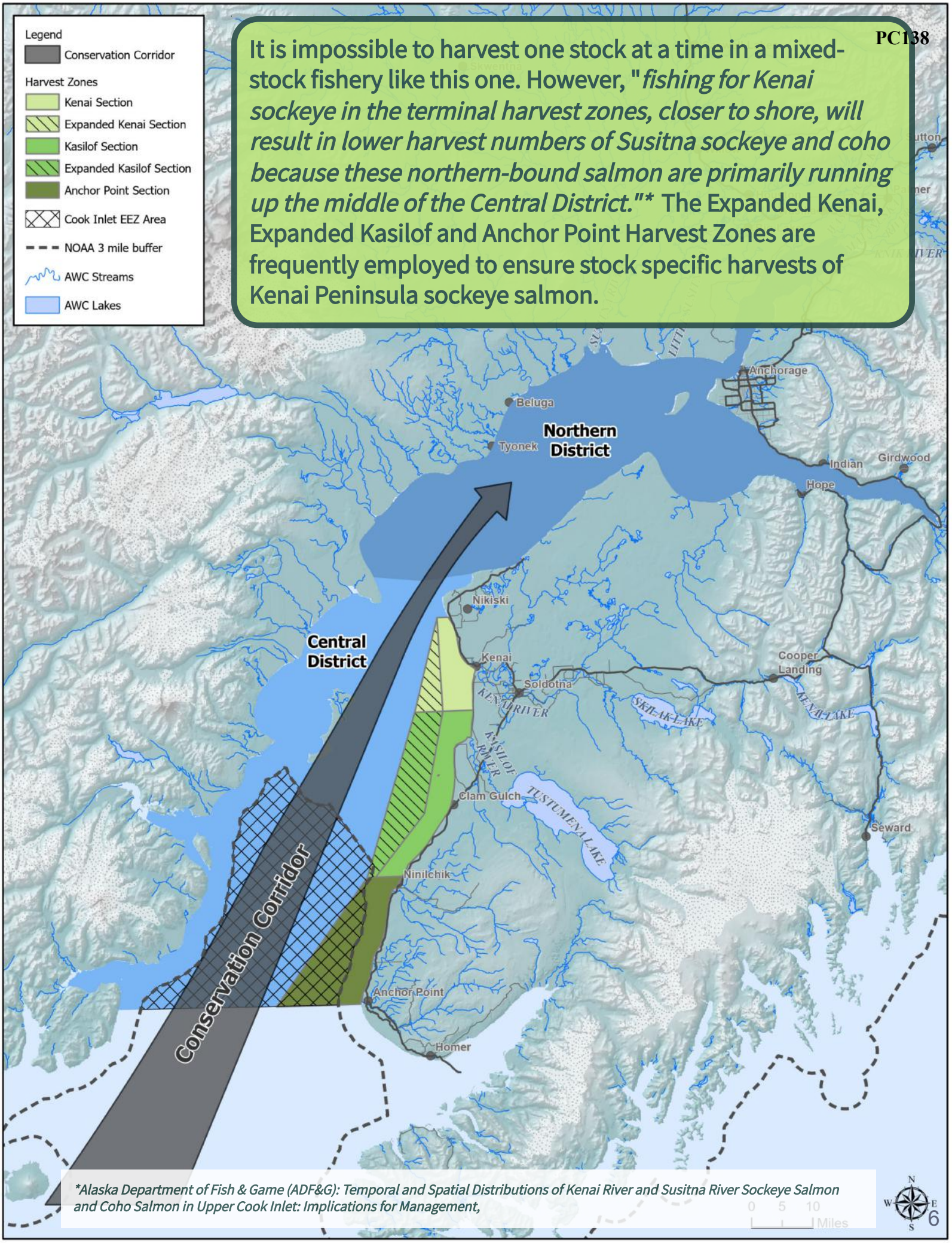


Photo Credit: Fernando Lessa

The concept was first applied in Upper Cook Inlet in 2011, with subsequent BOF cycles seeing it further refined.



*Alaska Department of Fish & Game (ADF&G): Temporal and Spatial Distributions of Kenai River and Susitna River Sockeye Salmon and Coho Salmon in Upper Cook Inlet: Implications for Management,

BEFORE THE CORRIDOR

For decades, commercial fisheries management of Kenai River sockeye has impacted Upper Cook Inlet with little regard for appropriate harvest levels of Northern District fish stocks. As a result, the populations of northern-bound salmon have suffered drastically, local fishing opportunities have been restricted or eliminated, and residents and visitors have watched as Northern District commercial setnetters, personal use, and sportfishing needs took a back seat to Central District commercial interests.

Stock of Concern

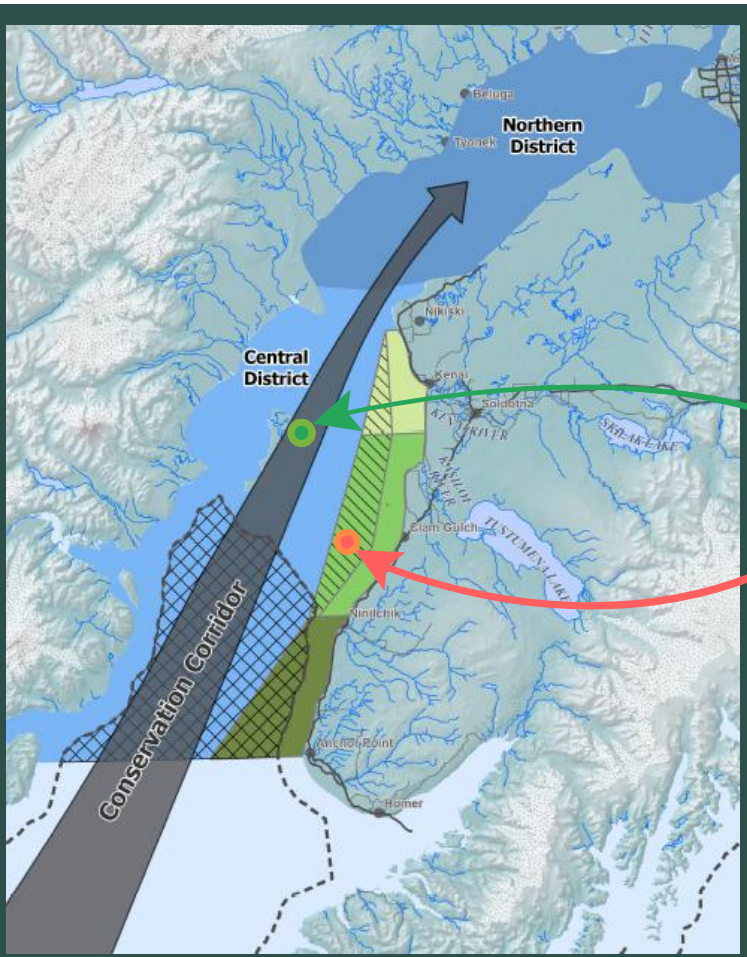
Susitna sockeye was designated a stock of concern in 2008; 12 years later, in 2020, as a result of regulatory changes enforcing the Conservation Corridor, they were delisted.

Coho Returns

Coho returns in Northern Cook Inlet streams reached record lows in 2011-2012. Regulations supporting the Conservation Corridor showed immediate improvements. The data below demonstrates the impacts commercial fishing locations can have on northern-bound coho.

Escapement

Attaining spawning escapement goals, the bedrock of fisheries management, had met chronic failure in the Northern District sockeye and coho streams, while the Central District often issued successive emergency orders to harvest more salmon.



From 2014-2019, drifters harvested an average delivery of 53 coho in the Conservation Corridor, versus 10 coho in the Harvest Zone, during the critical period from July 16-31.*

53 coho harvested per delivery

10 coho harvested per delivery

Data reinforces the importance of preserving the Corridor for northern-bound salmon passage, especially coho and sockeye.

*Source: ADF&G

Photo Credit: Redoubt Reporter

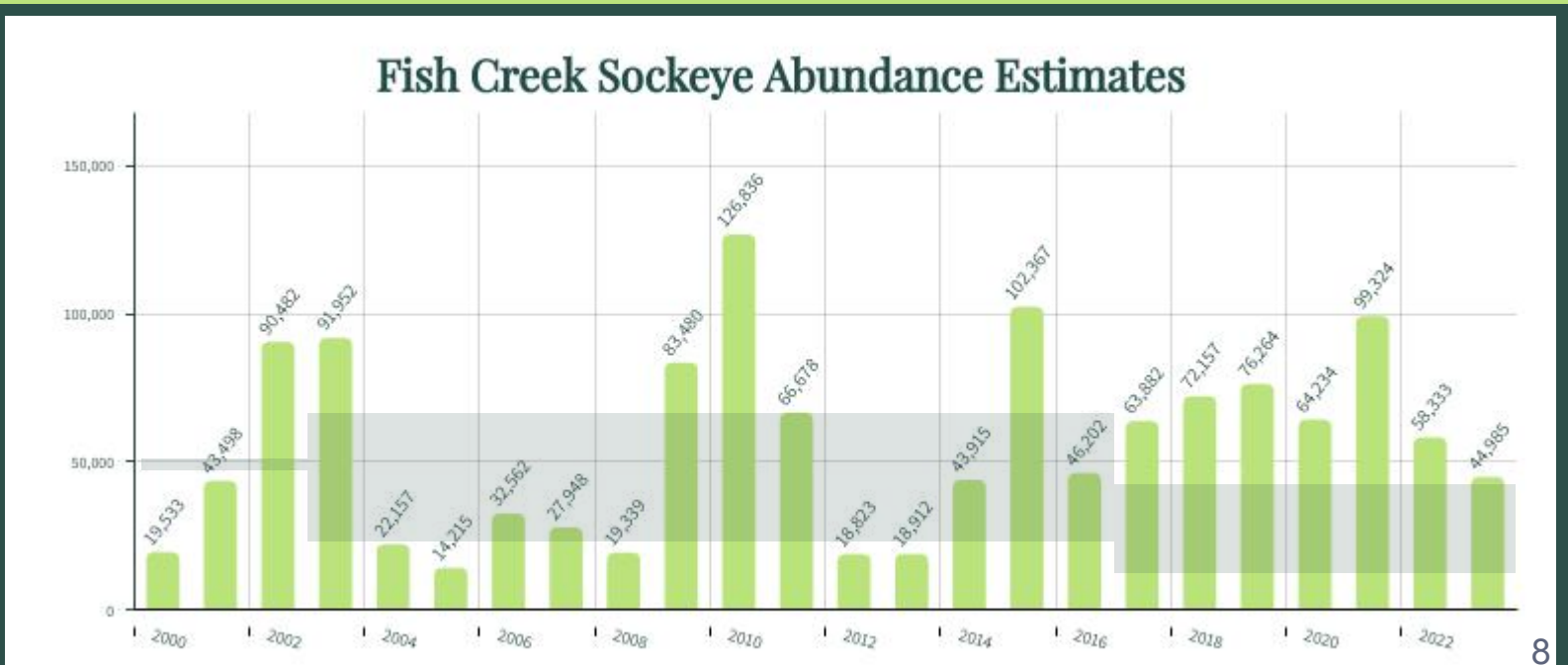
WITH THE CORRIDOR

2014

1. The commercial drift catch was more evenly balanced between the corridor and inshore areas.

2. More salmon moved through the corridor, successfully returning to the Northern District.

When the Conservation Corridor was established in 2011, Northern District salmon were almost universally in decline. In 2014, the Board of Fisheries voted unanimously to strengthen the Conservation Corridor by enforcing a clear directive that had been side-stepped for more than 35 years. Once the Corridor was established, during much of July, the drift fleet is redirected to fish inshore near the rivers where Kenai and Kasilof sockeye originate, allowing salmon to pass north, benefitting all Northern District users.



*Source: ADF&G

MIXED STOCK FISHERY COMPLEXITY

Every July, five different species of salmon, comprised of numerous stocks, swim through Upper Cook Inlet around the same time. Among the salmon are the Kenai sockeye, Kenai kings, Northern cohos, and Northern sockeye, all swimming in the same saltwater with commercial boats targeting Kenai sockeye. Farther upstream are the northern set gillnets. Still farther north are subsistence, personal use, and, finally, the inriver sport fishery.

Management of the Inlet's unique stocks and species often results in conflict among user groups. When commercial fishermen have a banner year for sockeye, sport fishermen often face closures because of low numbers of returning cohos. By further refining mixed-stock locations and identifying and fishing individual systems, harvest practices may be fine-tuned to benefit all users with an accurate, science-based approach. Given the variability of run timing year-to-year, and the current lack of inseason management tools in the Northern District, **a conservative approach to the Conservation Corridor concept is necessary to manage this complex fishery and maximize positive outcomes.**

Photo Credit: Natalie Sopinka

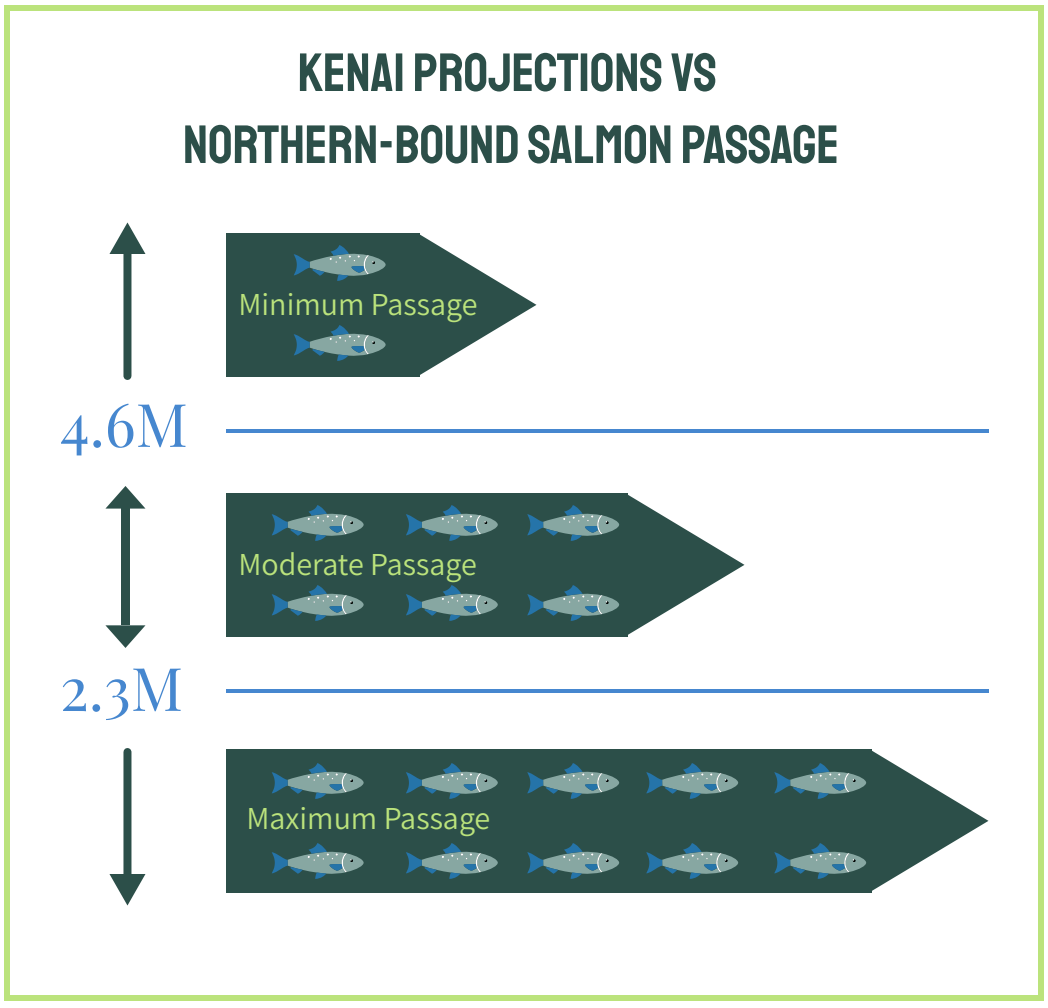
When ADF&G Forecasts a Large Sockeye Run, Fewer Salmon Return North to Spawn.

PC138

Historically, the larger the pre-season projections of Kenai sockeye by ADF&G, the fewer Susitna coho and sockeye successfully made it north to their natal streams to spawn. Large runs tend to trigger more liberal commercial fishing in the mixed-stock fishery of the Conservation Corridor. Fishing the drift fleet primarily in the harvest zones, even on years of high sockeye projections, is a compromise and the type of conservative management effort that supports healthy, sustained populations of salmon in the Northern District and all of Upper Cook Inlet.

Kenai Drives Management

Bigger Projections = Smaller Protections

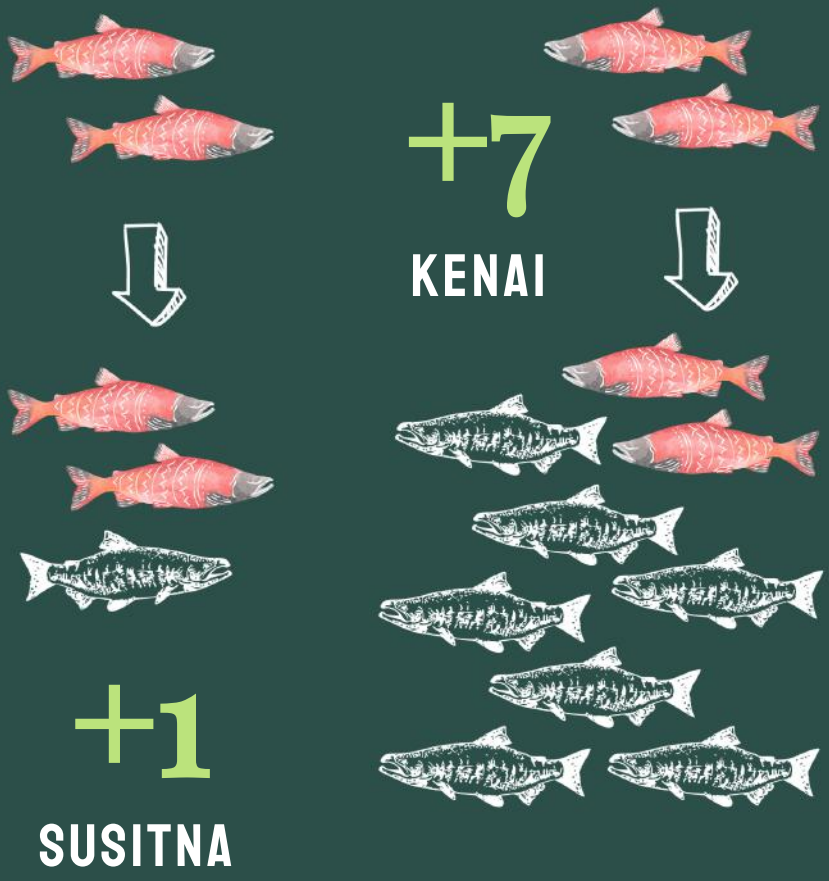


Managing fisheries in Cook Inlet is complex and management must consider many factors. Prior to the development of the Conservation Corridor, drift fisherman could fish in an area of their choice. Today, during a strong sockeye run with a projected escapement of up to 4.6 million fish, drifters are permitted only one 12-hour period per week in the mixed stock waters of the corridor from July 16-31. The higher the projection, the fewer restrictions on the drift fleet, and less northern-bound salmon make it through the corridor.

A Strong Conservation Corridor Protects Northern Salmon Stocks and the Health of Upper Cook Inlet Fisheries

A compounding factor in management is the productivity of the fish. **Kenai sockeye produce more returning offspring than Northern sockeye**: 4.5 fish per spawner to Susitna's less than 1.5 fish per spawner This means only one Susitna sockeye offspring can be harvested to sustain the stock versus the seven eligible Kenai offspring. The less productive stocks cannot support the same high harvest rates as the strong Kenai stock, and in a mixed-stock commercial fishery, it is impossible to manage effectively.

A NATURALLY LESS PRODUCTIVE STOCK NEEDS MORE PROTECTION

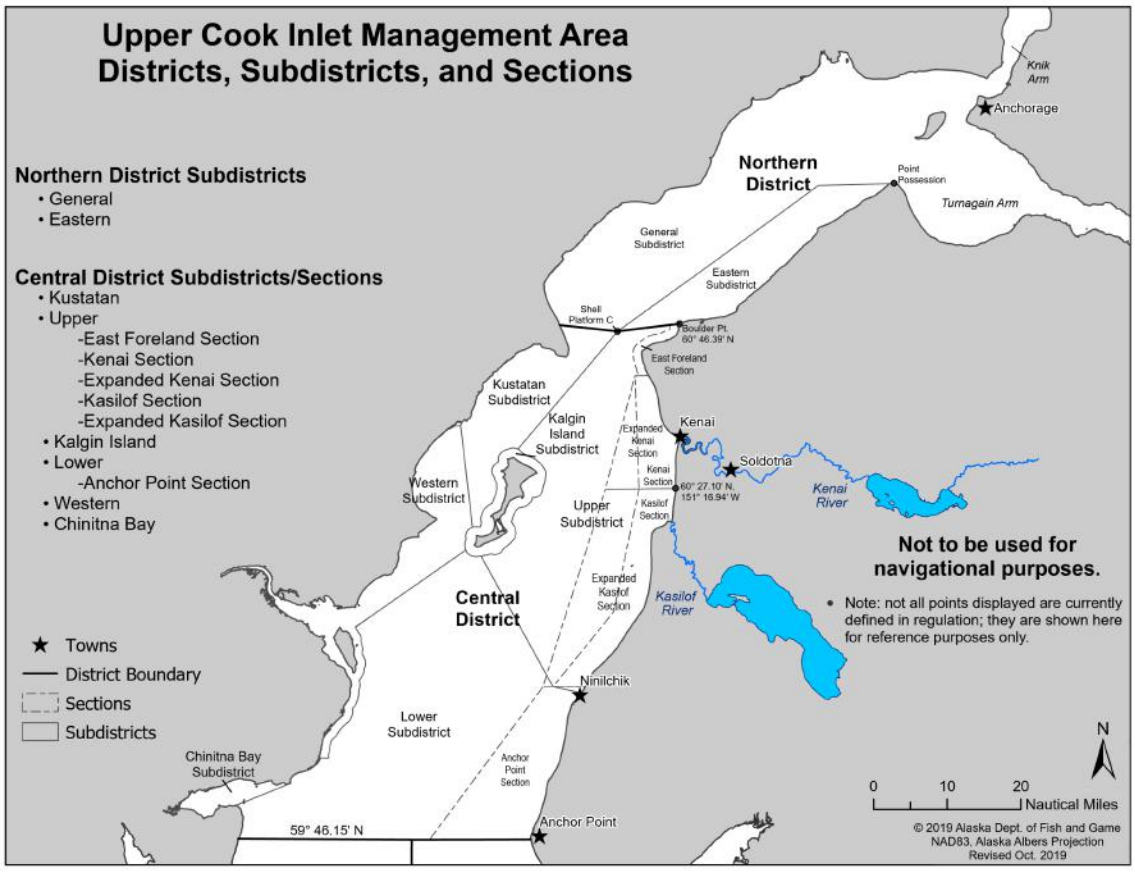


*ADF&G Sockeye Salmon productivity

UPPER COOK INLET
Unique Geography & Commercial Fisheries

Upper Cook Inlet (UCI) is a 125-mile-long funnel-shaped estuary in southcentral Alaska, with circulation patterns impacted by tides, freshwater input, and surface winds. Much of the inlet's water is glacial and the tides are semi-diurnal, with a mean tidal range of 4.2 meters in the lower inlet and 9.0 meters to the north near Anchorage. The northern tidal range is the second most extreme variation in the world. Tidal currents average 1 to 2 knots maximum at the entrance to the inlet and 5 to 6 knots maximum around Anchorage.

The UCI commercial fishery management area consists of marine waters north of Anchor Point and is divided into the Central and Northern Districts. The Central District is about 75 miles long, averages 32 miles wide, and includes six sub-districts broken into six sections. The Northern District is approximately 50 miles long, averages 20 miles wide, and contains just two sub-districts, beginning near the narrowest part of Cook Inlet and extending up to the Susitna River, Knik River, and Turnagain Arm.



Regulations that govern the UCI Conservation Corridor are found in 5AAC 21.353, *Central District Drift Gillnet Fishery Management Plan.*

The purpose of this plan is to, ***"ensure adequate escapement and a harvestable surplus of salmon into the Northern District drainages."***

Approximately half of Alaska's human population resides near the shores of UCI. This includes the city of Anchorage (288,121 in 2021) and an additional 110,000+ residing in the Matanuska-Susitna Borough. Primary freshwater sources into UCI include the major salmon-producing systems: the Susitna, Kenai, and Kasilof Rivers. Northern drainages are generally the largest producers of coho, chum, pink, and chinook salmon, whereas the Kenai Peninsula rivers dominate sockeye salmon production. The UCI commercial fishery harvests all five species of salmon.

Photo Credit: Joshua Foreman

FUTURE UNKNOWNS DRIVE NEED FOR CONSERVATIVE MANAGEMENT

The commercial fishery in Cook Inlet has changed significantly over time and will continue to adapt as we learn more and are impacted by future unknowns, such as Federal fishery management and warming water temperatures. The MSB Fish & Wildlife Commission prioritizes conservative management that provides reasonable harvest opportunities for all user groups, supported by the Alaska State Constitution, which states, *"The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people."*

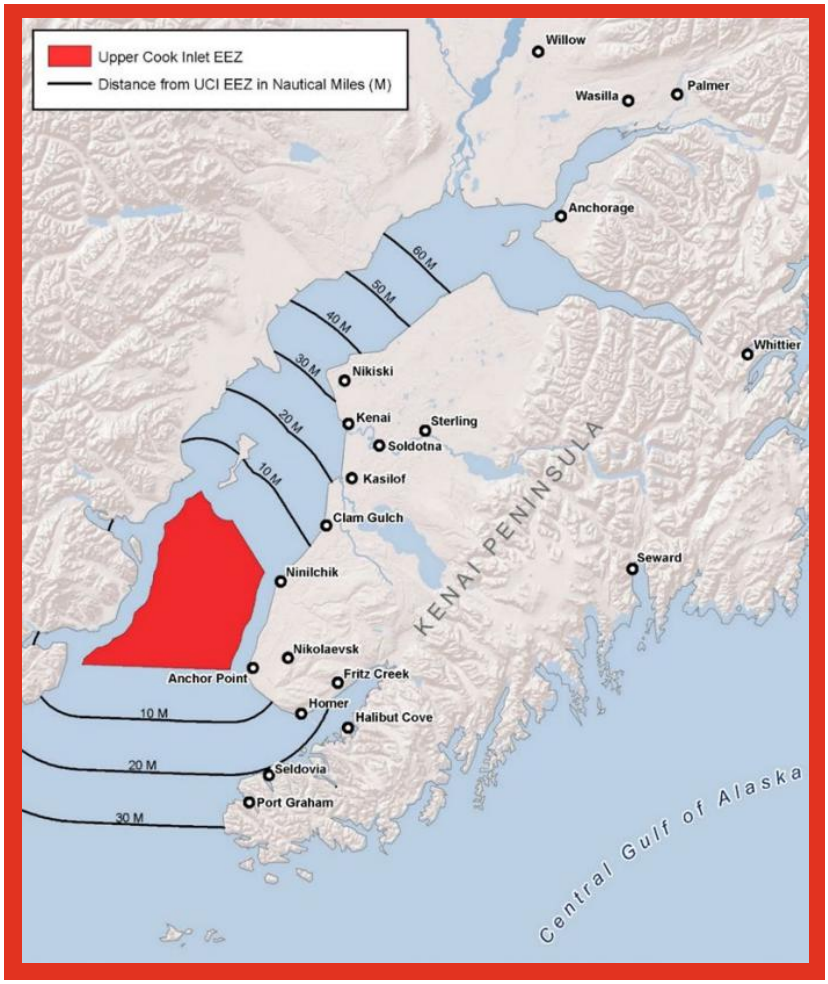
Run timings and migration routes overlap so much that the fishery has historically been mixed species and stocks in nature. Regarding commercial economic value, sockeye salmon are by far the most important component of the harvest, followed by coho, chum, pink, and chinook salmon. The ex-vessel value of the UCI commercial salmon fishery averaged approximately $27 million from 1970 to 2021. The average annual harvest during this period was 3.9M salmon, of which 2.8M were sockeye. The drift gillnet fishery generally accounts for about 55% of the annual harvest, with set gillnets harvesting virtually all the remainder.

Set (fixed) gillnets are the only permitted gear in the Northern District, whereas both set gillnets and drift (mobile) gillnets are allowed in the Central District. Seine gear is restricted too, but seldom used, in the Chinitna Bay subdistrict. The Commercial Fishing Entry Commission reported that 567 active drift gillnet permits were issued in 2021, of which 74% were issued to Alaskans. In the set gillnet fishery, 730 permits were issued, 84% to Alaskans. Of those permits, 364 drift gillnet permit holders and 510 set gillnet permit holders reported harvest in 2021.

Photo Credit: Jonny Armstrong

FEDERAL FISHERY MANAGEMENT

COOK INLET EEZ



Source: NOAA Fisheries

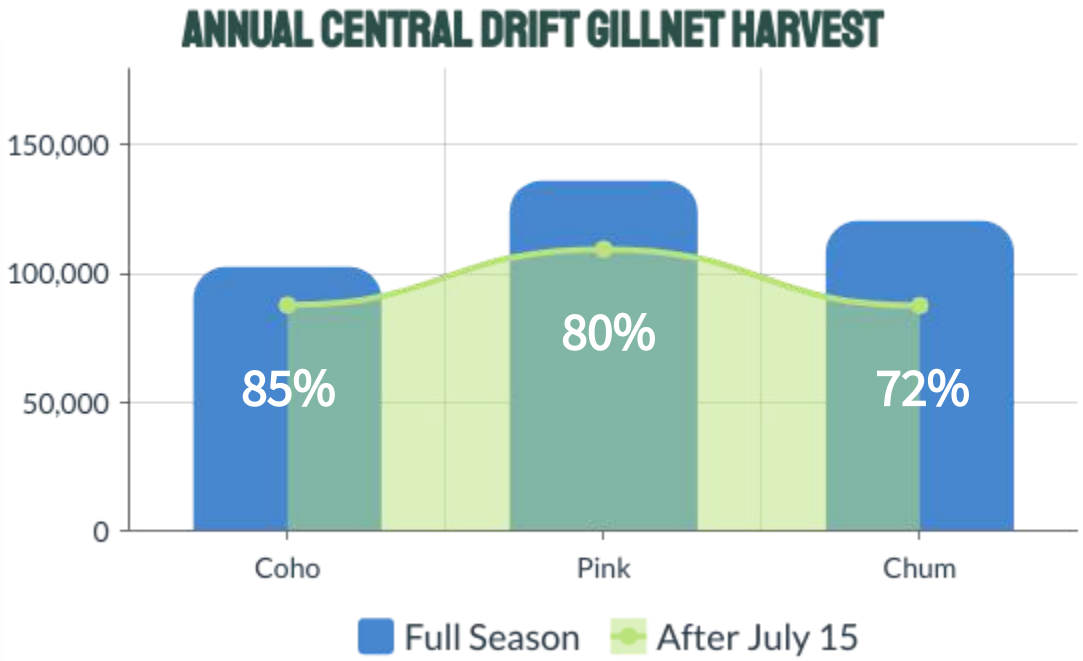
MANAGEMENT OF THE UCI COMMERCIAL FISHERY IS FACING MAJOR CHANGES.

The federal government is seeking public comment on a proposal that would implement federal management of the commercial fishery in the Exclusive Economic Zone (EEZ) waters of Cook Inlet. Previously, management of the EEZ was deferred to the State of Alaska and fishing occurred without respect to EEZ boundaries. The current proposal would result in federal management 'only' in the EEZ with state management throughout the remainder of UCI. EEZ waters start three nautical miles off shore, just south of Kalgin Island and cover roughly 1200 square miles of the inlet. This area is very important to the UCI drift gillnet fishery.

Federal management in the EEZ could devastate Northern District salmon stocks. Conservative management must be implemented for the immediate future.

PC138

- POTENTIAL TO DOUBLE THE COMMERCIAL DRIFT HARVEST
- LACK OF INSEASON MANAGEMENT TOOLS
- INABILITY TO MAKE TIMELY INSEASON MANAGEMENT DECISIONS



On a 20 year average, approximately 44% of king salmon, 62% of sockeye salmon, 85% of coho salmon, 80% of pink salmon, and 72% of chum salmon caught in the drift gillnet annual harvest occurs after July 15th.*

Source: ADF&G

*"Commercial salmon fisheries in Cook Inlet begin in June under State regulations. Around this time, Chinook salmon are already present in Cook Inlet and sockeye salmon begin migrating into Cook Inlet from the Gulf of Alaska. As salmon begin to move into Cook Inlet, with the exception of Chinook, they typically group in large tide rips in the middle of Cook Inlet to start moving toward their spawning streams, rivers, and lakes... salmon stocks originating from throughout Cook Inlet are mixed together. As they move northward up farther into Cook Inlet, individual salmon stocks will eventually move shoreward into State waters to reach their spawning streams. Stocks returning to freshwater systems farther north in Cook Inlet tend to stay close to the middle of the inlet when they move through the Cook Inlet EEZ Area."***

***Department of Commerce. NOAA. Federal Register: Fisheries of the Exclusive Economic Zone Off Alaska; Cook Inlet Salmon; Amendment 16. Vol. 88, No. 201. October 19, 2023*

The Fish and Wildlife Commission (FWC) has the following concerns with the proposed EEZ management plan:

- Amendment 16 proposes two 12-hour commercial fishing periods each week within the EEZ, on Monday from 7 a.m. until 7 p.m. and on Thursday from 7 a.m. until 7 p.m.
  - This change increases the ability of the drift gill net fleet to harvest large numbers of salmon in the EEZ, potentially doubling the commercial drift harvest.
  - The additional proposed fishing periods after July 15 increases fishing time during the critical period for moving fish through the Conservation Corridor, resulting in a greater harvest of northern-bound salmon and fewer fish reaching the Northern District.

- The National Marine Fisheries Service (NMFS) proposes to manage EEZ waters by regulating harvest using a Total Allowable Catch (TAC). Without adequate inseason management tools in the Northern District, the current data used to calculate a TAC is likely skewed toward the more abundant Kenai and Kasilof salmon stocks. This has the potential to allow overharvesting of the smaller and less productive stocks.

- The NMFS's ability to make timely inseason management decisions is severely hampered by their required processes. The Alaska Department of Fish and Game (ADF&G) has proven that salmon inseason management requires quick and timely management decisions. As is currently required, to implement an inseason adjustment, the NMFS must publish a temporary rule in the Federal Register, requiring a public comment period. This process could take weeks or months and does not allow NMFS to make timely management decisions required, often daily, to manage commercial salmon fisheries.

- The NMFS recognizes that it will take time to refine the application of their existing management tools as they develop management expertise and collect better data over time. Because of this, a more conservative management approach must be implemented for the immediate future.

As a result of these concerns the FWC recommends for the period from July 16 to August 15 to allow only one 12-hour EEZ fishing period per week and maintain the current drift gillnet length of 150 fathoms.

CURRENT STATE INSEASON MANAGEMENT

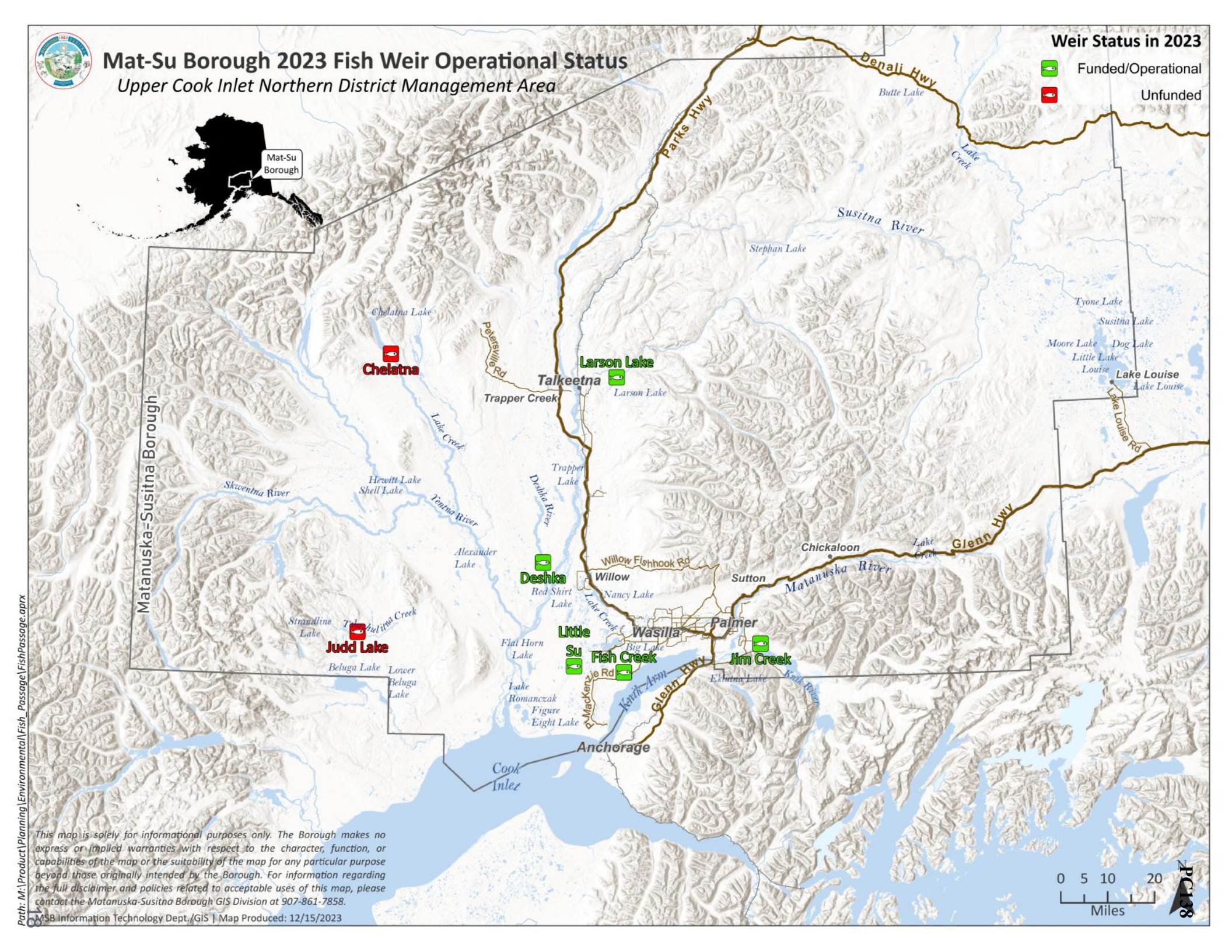
Since the Susitna counters are far up the inlet and farther up a vast river drainage, they provide limited real-time data useful for inseason commercial salmon management. While Kenai management immediately understands the abundance of its salmon runs, northern-bound salmon counts can be delayed by two to three weeks, depending on the time it takes to travel to their natal streams. The timing and the lack of conservative inseason management requires excessive use of emergency orders in the Northern District.

Because of this long travel time, through harvest fisheries, ADF&G has considered the Susitna drainage weir data as more of a post-season evaluation for salmon escapement rather than an effective inseason management tool. Even when Susitna sockeye escapement data shows abundances that could provide additional sustainable harvest, Susitna coho have a slightly later run timing, and their abundance levels may not sustainably support additional harvest. Additional and more timely inseason species, stock, and abundance data is needed. Concerning the federal fishery within the EEZ, there should be public discussion regarding how federal regulation enforcement will occur before fishing begins and how effective adjustments will be made inseason with the required lengthy administrative processes.

While Kenai management knows the abundance of its salmon runs more quickly, Northern-bound salmon counts are delayed by weeks.

TOOLS TO FACILITATE BETTER DATA-DRIVEN MANAGEMENT DECISIONS:

- **Test fisheries** at the Anchor Point line through August 15. An additional line of test net fishing should provide the same type of data for salmon that had successfully migrated through the EEZ.
- **Genetic testing** for sockeye and coho to determine productivity levels of various species and stocks; a different EEZ fishing pattern would impact these numbers.
- **Boat travel log trackers**, as used in East Coast fisheries, could better define EEZ drift gillnet locations where more discrete species/stock harvest could occur.
- **Consistent funding of escapement counts** using tools such as weirs or sonar throughout Upper Cook Inlet, especially in more remote areas. These tools would help gain accurate fish counts to manage inseason restrictions and identify historic run trends.
- **Restoration of the Genetic Stock Identification** (GSI) mark and recapture of the Susitna River sockeye salmon in conjunction with operation of the Judd, Larson and Chelatna Lake weirs to estimate run size and spawning escapement.



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MSB Information Technology Dept./GIS | Map Produced: 12/15/2023

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STOCKS OF CONCERN

Photo Credit: Jonny Armstrong

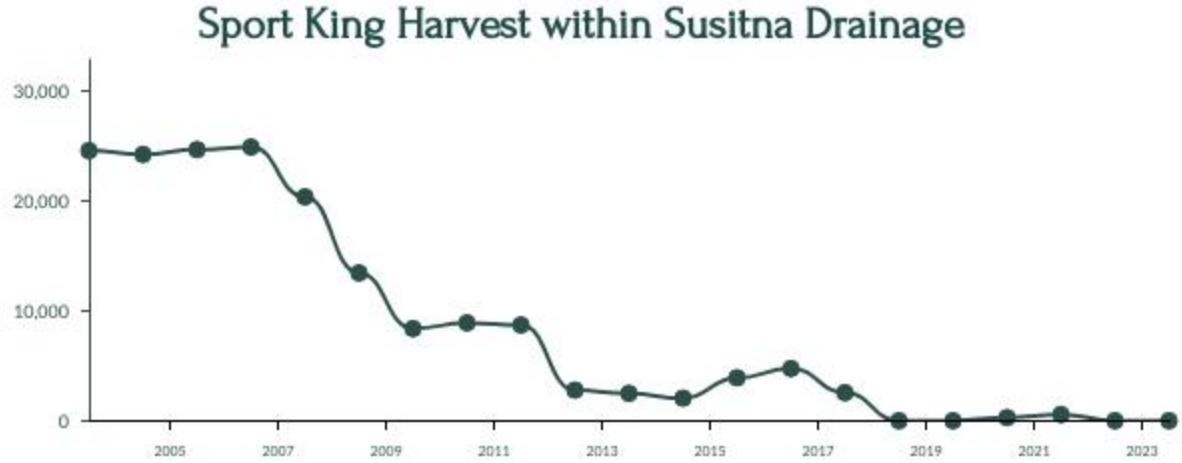
CURRENT
Stocks of Management Concern

- King in Alexander Creek (2010)
- King in Chuitna River (2010)
- King in Theodore River (2010)
- King in East Susitna (2019)

Stocks of Concern are fish chronically struggling to maintain population stability despite conservative management efforts. The Susitna River sockeye was designated as a Stock of Yield Concern in 2008. With the establishment of the Conservation Corridor in 2011, and subsequent regulations reinforcing the Corridor in 2014, the Susitna River Sockeye population improved enough to be delisted as a Stock of Concern in 2020. It is important to celebrate the positive impacts of conservative management efforts like these, but to also recognize that it didn't happen overnight and there is more to be done. It can take years to feel the effects of regulatory changes and maintaining current protections should be a top priority for policymakers. **Due to the early run timing of the northern king salmon in Cook Inlet, the Conservation Corridor has NO significant impacts on these salmon populations.** Additional management methods need to be considered.

Susitna King Salmon: A Drainage-Wide Stock of Concern?

Despite the improvement for Susitna Sockeye, numerous king populations throughout Upper Cook Inlet continue to be listed as a stock of management concern, and many have been there for more than a decade. The results are a continuously struggling stock, limited catch-and-release fishing, and full-season closures for residents. This begs the questions, is careful conservative management doing enough? Is there more to be done?



The graph shows the result of significant and continuing declines in king salmon returns to the Northern District resulting in limited harvest opportunities for anglers. **2023 is the fourth season since 2018 with no king salmon sport harvest in the Susitna.** Drainage-wide Susitna harvest declines (4th largest king salmon producer in AK*) indicate a larger concern. The FWC respectfully requests listing all Susitna Drainage King Salmon as Stock(s) of Yield Concern. In comparison, Susitna sockeye was a Stock of Yield Concern from 2008-2020, having never reached harvest levels as low as the kings.

*Source: ADF&G

Photo Credit: Madeline Lee

*"A **stock of conservation concern** is defined in 5 AAC 39.222(/)(6) as "a concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a stock above a sustained escapement threshold (SET); a conservation concern is more severe than a management concern."*

*"A **stock of management concern** is defined in 5 AAC 39.222(/)(21) as "a concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a salmon stock within the bounds of the SEG, BEG, OEG, or other specified management objectives for the fishery; a management concern is not as severe as a conservation concern. "*

*"A **stock of yield concern** is defined in 5 AAC 39.222(/)(42) as "a concern arising from a chronic inability, despite the use of specific management measures, to maintain specific yields, or harvestable surpluses, above a stock's escapement needs; a yield concern is less severe than a management concern." The SSFP defines chronic inability as "the continuing or anticipated inability to meet expected yields over a 4 to 5 year period."*

MAT-SU BOROUGH

The Matanuska-Susitna Borough lies at the head of Upper Cook Inlet and is Alaska's fastest growing region. Most of the Mat-Su's population resides in the core urban area surrounding the cities of Palmer and Wasilla, but despite it's growth, the majority of the region is wild and minimally developed. **The Mat-Su is more than 25,000 square miles, roughly the size of West Virginia, and is comprised mainly of pristine Alaskan wilderness**, with more than 50,000 miles of mapped streams and all five species of Pacific salmon.

- 5 salmon species
- 50,000+ stream miles
- Region the size of West Virginia

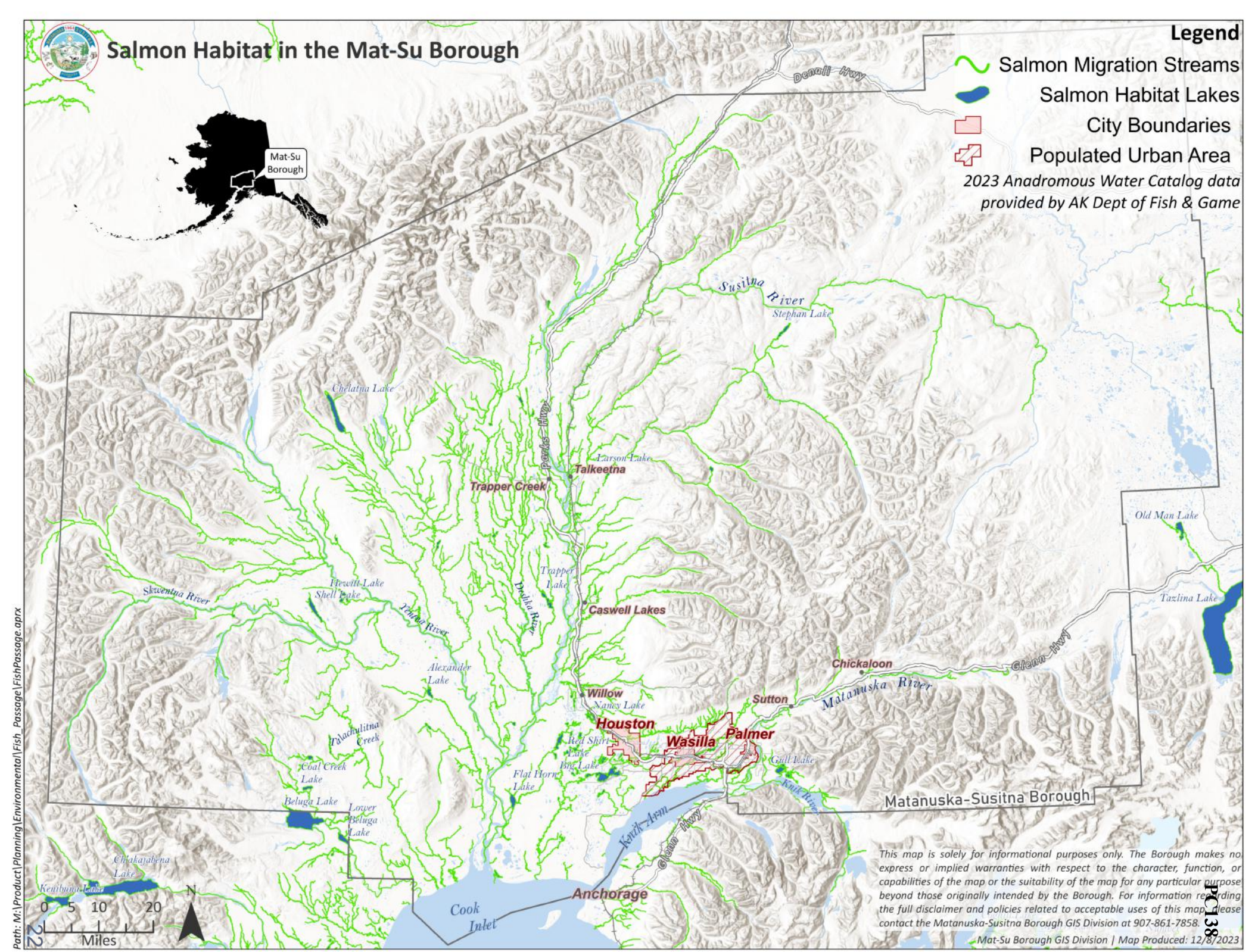
Local groups increase public awareness about the importance of preserving habitat for baby salmon

Photo Credit: Fernando Lessa

What do salmon that successfully migrate to Upper Cook Inlet find?

ABUNDANT HABITAT FOR SPAWNING.

There are more than 4,000 miles of documented salmon habitat in the Susitna Basin alone. These streams produce the salmon that are critical for the long-term stability of salmon populations in Cook Inlet. Through conservative management, maintaining and enhancing the Conservation Corridor increases the likelihood that an adequate number of fish return to continue sustainable populations.


Salmon Habitat in the Mat-Su Borough
Mat-Su Borough
Legend
Salmon Migration Streams
Salmon Habitat Lakes
City Boundaries
Populated Urban Area
2023 Anadromous Water Catalog data provided by AK Dept of Fish & Game
Denali Hwy
Susitna River
Stephan Lake
Chelatna Lake
Parks Hwy
Larson Lake
Talkeetna
Trapper Creek
Trapper Lake
Caswell Lakes
Old Man Lake
Tazlina Lake
Hewitt Lake
Shell Lake
Skwentna River
Yentna River
Deshka River
Alexander Lake
Willow
Nancy Lake
Chickaloon
Glenn Hwy
Matanuska River
Sutton
Houston
Wasilla
Palmer
Red Shirt Lake
Big Lake
Gull Lake
Knik River
Matanuska-Susitna Borough
Talachulitna Creek
Coal Creek Lake
Flat Horn Lake
Beluga Lake
Lower Beluga Lake
Chakachabena Lake
Kenibuna Lake
Knik Arm
Glenn Hwy
Anchorage
Cook Inlet
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Miles
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HABITAT IN THE MAT-SU
for returning salmon

Photo Credit: Carl Johnson

Habitat Is Critical, But It Takes Fish To Make Fish

The Susitna Basin is approximately 20,612 square miles. The Susitna River, from source to salt, is about 321 miles with 229 river miles and 4,030 tributary stream miles documented in the Anadromous Waters Catalog (AWC). Recognizing that there is undoubtedly more salmon habitat in the Susitna basin that has yet to be evaluated, there is a minimum of 4,258 stream miles in the Susitna basin alone. Salmon habitat here has the potential to contribute significantly to Cook Inlet salmon stocks, assuming enough salmon return to their natal streams to spawn.

The Conservation Corridor provides the "pipeline" to help sustain this vibrant ecosystem, and the MSB Fish & Wildlife Commission believes it is essential, and more economical, to protect salmon habitat and populations instead of restoring them.

The Mat-Su Borough contains abundant anadromous fish habitat, mostly centered around the massive Susitna River drainage. Salmon, rainbow trout, Arctic Char, and many other fish populate the streams. Key issues in maintaining healthy fish populations include ensuring northern-bound passage through Cook Inlet, limiting the impacts of development on fish habitat, understanding where streams are warming, and managing invasive species such as northern pike and elodea.

WATERBODY SETBACKS

In 2023, the MSB formed a Waterbody Setback Advisory Board (WBSBAB) to address a high number of setback violations on borough lakes. The WBSBAB consists of local experts, scientists, realtors, developers, and MSB residents. The MSB Fish & Wildlife Commission and the Mat-Su Salmon Habitat Partnership both hold a seat. The purpose of the board is to address current violations to create a path towards compliance, and to set future standards for development near waterbodies as the borough continues to grow. Board recommendations could include development guidelines like riparian buffers, and regulatory recommendations, such as the enforcement of a mandatory Land Use Permit to better assist homeowners in following best practices and building responsibly on and near lakeshores.

COLD-WATER REFUGIA

In addition to utilizing and implementing management tools for new development, organizations like the Mat-Su Salmon Habitat Partnership continue to bring new research forward that could help guide future land use decisions. Identifying and mapping critical cold-water refugia, areas with consistently cool water temperatures, necessary for salmon survival is an example of data that could help protect habitat for sustaining healthy salmon populations.

THE PIKE PROBLEM

Photo Credit: iStock.com/abadonian

Northern Pike currently occupy **64 waterbodies** in the Mat-Su Borough, totaling **19,764 surface areas** and **70% of all AWC documented anadromous lakes and ponds**. Beyond that, 13% of all AWC lakes and ponds have had moderate to severe pike impacts, and an additional 26% of all AWC lakes and ponds have been completely destroyed by pike infestations. **Without human intervention, the presence of pike will only increase.** Because the impacts pike have on salmon populations take place below the surface and out of view, the issue has not gotten the urgent attention it needs. Additional research and dedicated funding will be necessary to eradicate pike from salmon spawning and rearing grounds.*

*Source: ADF&G

FISH HABITAT IMPROVEMENTS

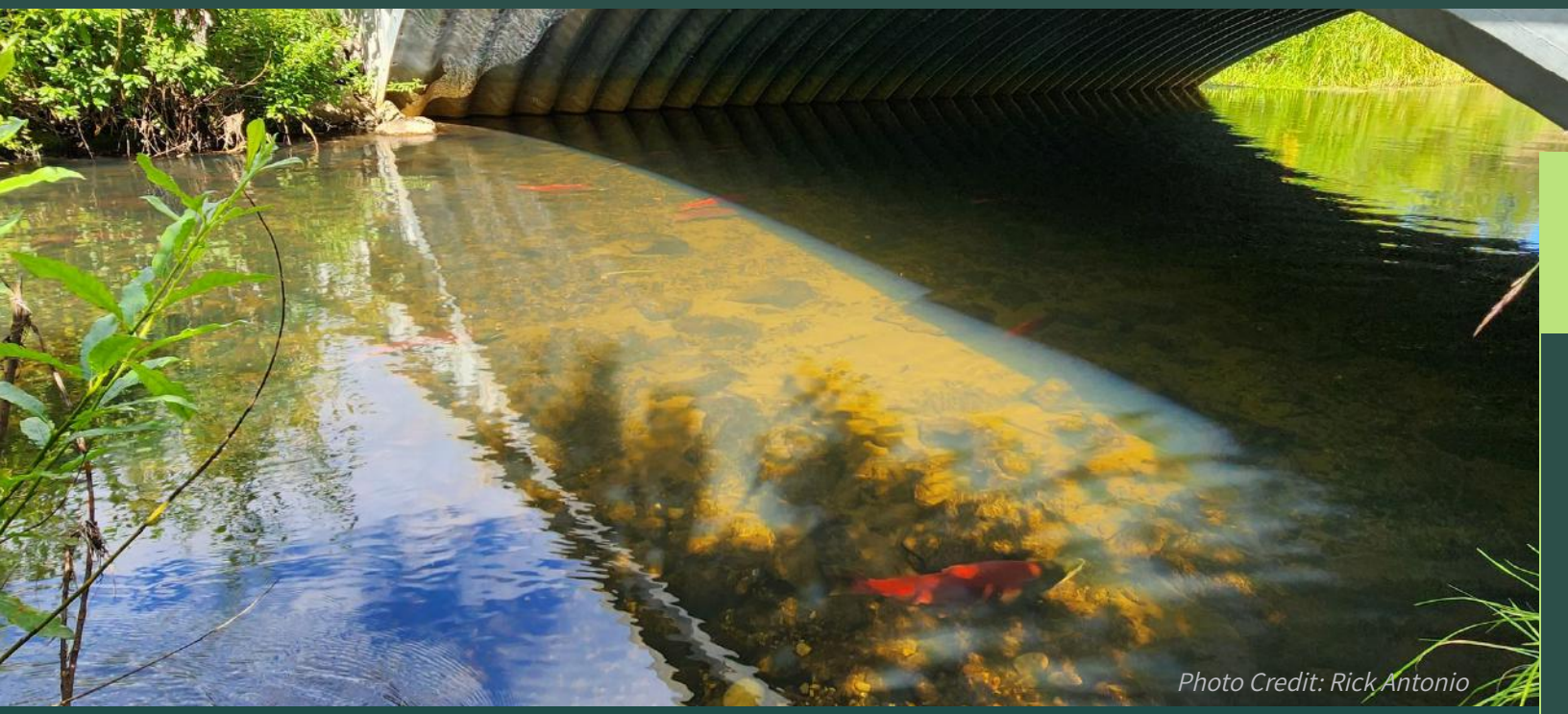


Photo Credit: Rick Antonio

The Matanuska-Susitna Borough is widely recognized for its extensive fish passage program that has **reopened over 1000 stream miles and more than 6000 acres of lake habitat for salmon rearing and spawning**. As of 2023, 153 culverts have been removed or replaced for fish passage within the region on State, Mat-Su Borough, Alaska Railroad, and privately owned land. This investment by local partners totals over $20 million, and the Borough's robust culvert replacement program is ongoing as fisheries remain a priority.

The Mat-Su Borough has been a leader in this effort, as no other local government in Alaska has such an aggressive replacement program. The Mat-Su is lauded in Washington, D.C. by the U.S. Fish & Wildlife Service for doing it right and several national awards have been credited to the Mat-Su and its partners. The work continues with additional culvert replacement projects scheduled over the next few years. With high priority projects on many State, Alaska Railroad, and privately owned routes, it presents an opportunity for continued partnership in moving projects forward and successfully returning salmon to their natal streams.

Other partners have also invested in projects that improve and enhance salmon habitat within the Mat-Su Borough. Great Land Trust has completed 22 projects to date that have conserved nearly 10,000 acres of fish habitat, and 44 anadromous stream miles. The Native Village of Eklutna has partnered with Great Land Trust to provide conservation easements and together they have conserved thousands of acres of land for subsistence hunting, fishing and foraging. Knik Tribal Council and Chickaloon Native Village have contributed to habitat restoration throughout the region. Through numerous projects over the past several years, Chickaloon has restored more than 13 stream miles, and continues to plan future culvert replacement projects through the Chickaloon Native Village Tribal Fish Passage Program.

The Borough has demonstrated its commitment to this issue by annually approving funds specific for stream crossing replacement projects to be then used to leverage additional funding opportunities. Millions of dollars have been spent on this effort, shared by the Mat-Su Borough, NOAA's Alaska Sustainable Salmon Fund, National Fish Habitat Partnership, and the U.S. Fish and Wildlife Service's Partners for Fish and Wildlife and Fish Passage Programs. **In 2023, the MSB Fish & Wildlife Commission, through the MSB Assembly, requested $2.5 million in State appropriations toward science, genetic research, and fish passage**.

Photo Credit: Jonny Armstrong

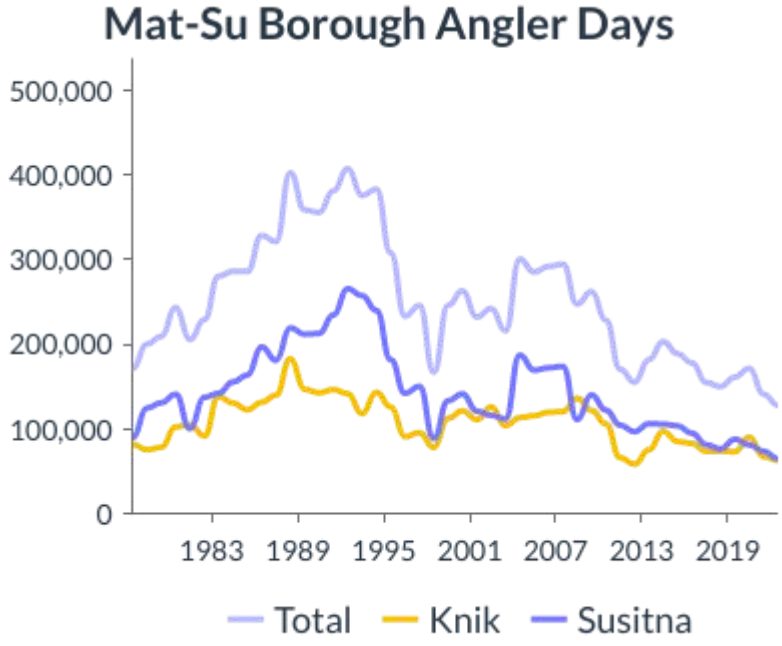
"The scale of the fish passage program in the Mat-Su is pretty unprecedented in the commitment to really seeing through and improving fish passage borough-wide."
—Alaska Dept. Fish & Game

PC138

A REASONABLE OPPORTUNITY

A mission of the MSB Fish & Wildlife Commission is to work towards adopting management plans conservative enough to reach midpoint escapement goals for Northern Cook Inlet sockeye, coho and king salmon, providing more realistic and reasonable shared harvest opportunities throughout the season, for all users.

2007 AND 2017 STUDIES SHOW DECLINE IN MAT-SU BOROUGH SPORTFISHING



*Source: ADF&G

ANGLER DAYS

Local fishing opportunity is an important economic driver for the Northern District and provides immeasurable benefits to visitors and residents who rely on summer salmon runs each year. The decline in angler days for sportfishing in the Northern District has stabilized slightly since the Conservation Corridor was put in place, but dipped to it's lowest count in 2021 and 2022, partially due to increasingly low king salmon returns which are not impacted by regulations in the Conservation Corridor. If the economy of local fisheries is a priority in the Northern District, more conservative management is necessary.

TAKEAWAYS

The Matanuska-Susitna Borough Fish & Wildlife Commission supports fisheries management using the best available science. Harvesting Upper Cook Inlet salmon stocks, primarily where directed harvests can best match individual stock production and abundance level, minimizes inseason restrictions and closures. This management approach will maximize the benefit for the state, the fishing economy, and the health of the fishery. The practice is proven. The most successful fishery in the world, Bristol Bay Sockeye, is regulated with terminal fishing districts.

THE CONSERVATION CORRIDOR WORKS AND SHOULD BE MAINTAINED AND ENHANCED TO CONTINUE MAKING POSITIVE IMPACTS.

Photo Credit: Jonny Armstrong

All issues show the need for conservative management and maintenance of existing systems, such as the Conservation Corridor.

More fish does not always mean harvest should be increased.

A number of uncertainties have been identified and amplified by a lack of inseason data. This demonstrates the need for increased and more consistent funding for management tools like weirs, sonar, genetic studies, test fisheries, etc.

It takes fish to make fish, and it takes fish returning to natal streams in the Northern District to support healthy salmon populations alongside successful sportfishing economies.

PROPOSAL 231

5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan.

Modify dates of the Susitna River dip net fishery as follows:

5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan.

. . .

(h) salmon may be taken by dipnet in the Susitna River, only as follows:

(1) **July 17 – August 7:** [JULY 10 - JULY 31:] Open to fishing only on Wednesdays and Saturdays from 6 a .m . to 11 p .m .

What is the issue you would like the board to address and why?

Personal use harvests have been modest during the first three years of this fishery and harvest data indicates the first Saturday and Wednesday occur before there are many salmon available for harvest. Harvest and weir data indicate better abundance of the four salmon species open to harvest in this fishery later in the season. In addition, harvest data indicates that a few king salmon have been illegally taken in this fishery.

- The Northern District Salmon Management Plan specifically seeks to provide harvest opportunity based on abundance.
- The plan further specifies providing sport, guided sport, and OTHER INRIVER USERS a reasonable opportunity to harvest not just chum, pink, and sockeye salmon, but also coho salmon over the entire run.
- Illegally harvested king salmon are more likely to be caught in the early portion of July.

The MSB FWC proposes amending the Lower Susitna River personal use fishery to run one week later on Saturdays and Wednesdays from July 17 - August 7.

State of Alaska Constitution
Article 8 - Natural Resources

Sections concerning Fisheries

§ 1. STATEMENT OF POLICY

It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.

§ 2. GENERAL AUTHORITY

The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.

§ 3. COMMON USE

Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

§ 4. SUSTAINED YIELD

Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

§ 5. FACILITIES AND IMPROVEMENTS

The legislature may provide for facilities, improvements, and services to assure greater utilization, development, reclamation, and settlement of lands, and to assure fuller utilization and development of the fisheries, wildlife, and waters.

§ 15. NO EXCLUSIVE RIGHT OF FISHERY

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the State. [Amended 1972]

Matanuska-Susitna Borough Fish & Wildlife Commission

With the Support of MSB Staff: Maija DiSalvo, Planning and Stefan Hinman, Public Affairs // Maps by Heidi Whipple and Carla Goers, GIS

Photo Credit: Jonny Armstrong

Mat-Su salmon PARTNERSHIP

February 9, 2024

Comments submitted by: Mat-Su Basin Salmon Habitat Partnership

Alaska Board of Fisheries
ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

ATTN: Board of Fisheries Comments for Upper Cook Inlet Finfish Meeting

Dear Board of Fisheries members:

The Matanuska-Susitna Basin Salmon Habitat Partnership (Partnership) has been working to protect salmon habitat in the Mat-Su Basin since 2005. We are a voluntary and non-regulatory coalition that has grown from a handful of founding organizations, to nearly 70 organizations and individuals who share a common vision for thriving salmon, healthy habitats and vibrant communities co-existing in the Mat-Su. The Partnership is guided by a strategic action plan that identifies four ways to accomplish our habitat goals: improving scientific knowledge about salmon habitat needs throughout their lifecycle, conserving productive habitat throughout the Mat-Su Basin, strategically restoring degraded or disconnected habitats, and providing opportunities for education, collaboration and information sharing.

Management of Alaska's fisheries is respected around the world. The Mat-Su Salmon Habitat Partnership appreciates the crucial and challenging role the Board of Fisheries (Board) plays in this successful management model. Here, we offer information about the Mat-Su Salmon Habitat Partnership in service of the Board's consideration of Cook Inlet fisheries management. The Mat-Su Salmon Habitat Partnership appreciates recognition of habitat as a critical foundation for healthy salmon fisheries as articulated in the Board's Sustainable Salmon Policy (5 AAC 39.222) and acknowledges that the work of the Partnership is consistent with the salmon habitat provisions in this policy.

Over the past 17 years, the Mat-Su Basin Salmon Habitat Partnership has funded a total of 119 salmon and salmon habitat related projects in the Mat-Su through the National Fish Habitat Partnership. This includes 44 science, 34 restoration, 22 conservation and 19 education/coordination projects totaling $4.5 million in direct funds with over $15.5

million in other project contributions from private and public sources. In 2024, the Partnership anticipates funding multiple salmon habitat projects that include improving fish passage, addressing aquatic invasive species, and water quality monitoring and salmon genetic sampling.

Here are some Partnership highlights:

- Ongoing stream temperature, flow and juvenile salmon studies are increasing our understanding of drivers of freshwater salmon productivity, and ability to forecast what the Mat-Su's broader salmon habitat may look like in a warming climate.
- Partners have identified cold water inputs (cold water refugia) on the Deshka River and Big Lake Basin.
- Over 9,300 acres of priority estuaries, wetlands, riparian areas, and uplands important for salmon have been conserved in the Mat-Su through conservation easements with Great Land Trust and other partners.
- Fish passage has been restored at well over 100 sites identified as barriers to juvenile and adult salmon in the Basin, with recent increased funding provided through the Bipartisan Infrastructure Law and Inflation Reduction Act. In 2013, Mat-Su Borough adopted fish friendly design standards on borough roads helping prevent creation of new barriers.
- In 2020, the Partnership developed science summaries for community leaders that synthesize information on the value of riparian areas and wetlands – including best practices, as well as potential impacts to salmon from aquatic invasive species. Links to the summaries are found at the bottom of this letter.
- In November we will host our 17th annual Salmon Symposium where over 25 presenters and nearly 100 attendees share scientific research in the Mat-Su. We hope you will consider attending.

The Deshka River has hosted one of the most productive fisheries in the Matanuska-Susitna Basin. It is also among the warmest salmon systems in the Mat-Su with summer water temperatures regularly exceeding thresholds considered stressful for salmon. A handout found in the list of links below, describes collaborative science occurring on the Deshka River that was highlighted during the 2022 Partnership summer site tour, to provide community leaders with current information on stream temperature and potential impacts to salmon and their habitat in the Mat-Su – both today, and in the future. Partners have for instance, identified cold water inputs (cold water refugia), which could serve as critical habitat in maintaining the Deshka River as a salmon stronghold in a warming future. We invite Board members to join us on these annual tours.

The future of Mat-Su salmon depends upon what happens to them during each life stage, from their incubation and rearing in freshwater, to their maturation in saltwater, and their return back to freshwater to spawn. While research continues to determine the reasons for decline of some salmon stocks across Alaska and in the Mat-Su Basin, it is well-known that freshwater habitat loss and fragmentation have been some of the primary drivers in the decline of anadromous fish in the U.S. and the world. Based on lessons learned elsewhere, we know that maintaining these functioning habitats is far more cost effective than trying to restore them once they are degraded. Therefore, the goal of the Mat-Su Salmon Habitat Partnership is to ensure that Mat-Su salmon have healthy habitat, from upper Cook Inlet throughout the Mat-Su Basin. Our top priority is to protect and maintain healthy habitat wherever possible.

The Mat-Su Basin Salmon Habitat Partnership welcomes any questions or requests for information by the Board of Fisheries in its work toward maintaining sustainable fisheries into the future for all Alaskans.

On behalf of the Mat-Su Salmon Partnership,

Jessica Speed
Mat-Su Basin Salmon Habitat Partnership Coordinator
[redacted]
www.matsusalmon.org

Referenced Links:

1) 2022 Deshka River Site Tour Handout
2) Value of Riparian Areas
3) Importance of Wetlands
4) Impacts of Aquatic Invasive Species on Salmon

My name is John McCombs from Ninilchik, coming to board meetings since 1984. I still find it unethical that the board has arbitrarily scratched Soldotna off the Alaska map for 25 years! Unlimited guides,Unlimited dipnetters, Unlimited traffic, all unsustainable. The road to recovery is a dead-end unless king salmon are protected where they spawn. Regarding paired restrictions,any plan that includes these must also provide an opportunity for setnetters to fish. On the remaining proposals my support would echo the votes of the CENTRAL PENINSULA ADVISORY COMMITTEE. I will not be attending in Anchorage, currently recovering from an unplanned surgery. Thank you.

Submitted by: Patrick McCormick
Community of Residence: Eagle River Alaska

BOF Comments

153 I support this proposal. Current regulations do not stop guided angling on the lower river, and they do not promote less motorized use on mondays. It just limits guides to having clients fish from shore, this causes further conflicts with non guided anglers.

156 I am the author of this proposal and strongly support it. Increasing opportunities for non motorized use on the kenai river will reduce the stress on spawning king salmon, decrease bank erosion, and allow guides to offer a quality guest experience throughout the year.

165 I am the author of this proposal and strongly support it. Middle river regulations have gotten extremely complex, to the point where they are hard to understand and enforce. I offer a common sense solution.

166 I support this proposal. It finds the right balance between conserving rainbow trout and allowing opportunity to participate in the fishery.

167 I support this proposal with amendment allowing two flies to be used in tandem. Simplifying middle river regulations would be of great benefit to all river users.

168 I am the author of and I support this proposal. Alaska should be in line with the rest of the country and allow dropper flies to be used.

179 I strongly oppose this proposal. The Kenai River directly below Kenai Lake is virtually the only place to fish a river in the state in winter. Furthermore during the proposed closure there are less coho salmon than during the proposed open period.

180 I strongly oppose this proposal. The Kenai River directly below Kenai Lake is virtually the only place to fish a river in the state in winter. Furthermore during the proposed closure there are less coho salmon than during the proposed open period.

181 I strongly oppose this proposal. This would take away the only meaningful opportunity to fish the middle kenai river with some success for shore bound anglers. While protecting these fish is important closures on using watercraft, motors, or snowmobiles may be a better approach, ensuring access to a fishery while limiting use. Furthermore this regulation would further increase pressure on vulnerable steelhead stocks on the Kasilof River.

185 I strongly support this proposal. In addition to benefit to King Salmon, Kasilof River steelhead stocks are particularly vulnerable to the the use of bait in the spring time. Closing the river to bait use would have a dramatic benefit to these stocks.

190 I am the author of and strongly support this proposal. To be a catch and release guide on the Kenai River I must spend close to $2000 to obtain several permits. To guide people catching commercial level quantities of salmon with 5 foot gillnets zero permits are required. This is insane.

191 I am the author of and strongly support this proposal. The Kenai, Kasilof, Fish Creek and Susitna River are all different fisheries with different management plans and management goals, we should allow the department to manage them separately and have a mechanism to allow for increased harvest when appropriate.

193 I am the author of and strongly support this proposal. Protecting Kenai River King Salmon stocks should be of utmost importance when managing fisheries. All user groups have had significant conservation burdens. It is important that any king salmon caught in personal use gillnetting (dip nets are gillnets) is released as unharmed as possible. Allowing these precious fish to flop around in bottoms of boats while gillnets are being untangled is about the worst possible way to ensure successful spawning.

219 I am strongly opposed to this proposal. First this regulation would entirely close the only opportunity to have quality fishing for rainbow trout in southcentral alaska's road system. Furthermore eliminating trout fishermen on these streams will further embolden poachers, as trout fishermen are much more likely to report salmon poachers to the state troopers. This proposal severely limits opportunities for no biological purpose.

223 I am the author of this proposal and strongly support it.

224 I am the author of the proposal and strongly support it. The current regulations on Willow Creek make very little sense and are not in line with what we know about the population of trout in Willow Creek.

225 I strongly oppose this proposal. It makes no biological sense and the author has opportunities to harvest fish under subsistence regulations if they are needed for subsistence.

226 I am the author of this proposal and strongly support it. Tandem fly rigs are already commonly illegally used throughout the drainage. There would be virtually no impact of allowing tandem rigs. This is legal gear in fly fishing only waters of most western states, and is even allowed in places such as Yellowstone National Park.

249 I support this proposal however there should be language to allow electric motors.

253 I am the author of and strongly support this proposal.

254 I am the author of and strongly support this proposal. Chester Creek is a quality fishery for rainbow trout and should be treated as such. Upper Campbell creek has special waters classification even though it has almost no wild rainbow trout. The wild rainbow trout that do exist are generally smaller than six inches, whereas Chester Creek has a significant number of rainbow trout in the 8-20" range and there are reports of fish up to 25 inches caught in the drainage. I included provisions to ensure a put and take fishery could continue to exist at University Lake, if the department chooses to continue stocking it.

255 I strongly oppose this proposal. There are no management plans or stock assessments for the 20 mile river. Allowing dipnets (gillnets) to be used with could be very detrimental to stocks of salmon that we know virtually nothing about.

Proposal 153: Support Proposal 156: Support Proposal 165: Support Proposal 166: Support
Proposal 167: Support With Amendments Proposal 168: Support Proposal 179: Oppose
Proposal 180: Oppose Proposal 181: Oppose Proposal 185: Support Proposal 190: Support
Proposal 191: Support Proposal 193: Support Proposal 219: Oppose Proposal 223: Support
Proposal 224: Support Proposal 225: Oppose Proposal 226: Support Proposal 249: Support
Proposal 253: Support Proposal 254: Support Proposal 255: Oppose

January 26, 2024

Dear Chairman Wood and Board of Fisheries members:

Lifelong Alaskan that loves to fish & hunt. Salmon is life.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Megan McKay
Soldotna

PC143

Submitted by: Daniel Meyer
Community of Residence: Kenai Alaska

I support proposal 83

Proposal83: Support

PC144

Submitted by: Michael Mickelson
Community of Residence: Cordova, AK

Chair and members of the board, I am writing to oppose proposal 43. Extremely similar versions of this proposal have been submitted in multiple regions and during multiple board cycles. Every one has failed. Although I don't fish in Cook Inlet the proposal would have implications for all other regions in the state that have hatchery systems. As such, this proposal belongs in a state wide meeting.

The science does not support its conclusions, and there are not numerous scientifically rigorous, peer reviewed studies that have tied hatchery fish with reduced productivity of wild stocks. The hatchery research project looked at hatchery fish straying in wild streams in Prince William Sound and Southeast Alaska. If anything, the results generated more questions than they provided clear cut answers.

There are a lot of factors that are contributing to poor performance of wild stocks around the state. If there was an easy solution to fix our salmon productivity it would already be done. Scapegoating hatcheries is not going to solve weak runs in Cook Inlet. The data does not support it.

Thank you for the opportunity to comment,

Mike Mickelson.

PC145

Submitted by: Steve Miller
Community of Residence: Girdwood, AK

Kenai Kings,(all kings), need protection. This is the most serious fishing issue in South central/ kenai peninsula. These stocks are in dangerous decline. OEM numbers should be increased significantly as the current levels have been shown to be insufficient with declining returns area wide. NO commercial, sport or personal use fishing should begin until minimum numbers have been achieved. I understand the temporary damage this will do to the commercial red harvest bust I believe it is a necessary sacrifice to save the kings. I also support a 5 year moratorium on sport fishing for kings, no catch and release even. We may be past the point of no return on the great king salmon. Our only hope to save this iconic species is to take drastic action. Thank you.

Submitted by: Christopher Mizelle
Community of Residence: Kenai, AK

See attached

[NO ATTACHMENT UPLOADED]

PC147

Submitted by: Jesper Moldaschl
Community of Residence: Hadsten, Denmark

Please don't consider lowering the current OEG on late run kings.

Proposal83: Support

PC148

Submitted by: Fletcher Morrison
Community of Residence: Homer, Alaska

Hello to all involved..

My name is Fletcher Morrison.. a 43 year old Prince William sounds fisherman.. I have been fishing the sounds since I turned 18.

I have followed the salmon runs closely throughout these years and am now more invested than ever. I have seen the improving fish return numbers of hatchery and wild stock fish combined. They work harmoniously together.

When there is a low wild stock return year they tend to join up and follow the hatchery fish into the sounds. Giving them a greater chance to enter the sounds healthy and find their escapement streams.

And I have also viewed the opposite, when there is a weak hatchery run and strong wild stock entry, the wild stock will help guide hatchery fish into the sounds.

With This comes a small percent of straying as various ongoing studies have shown. Hatchery fish entering some wild escapement streams and some wild fish ending up at the hatcheries..

With that I believe we do need close monitoring of hatchery's egg take/release numbers.. I see no sign of a weakening eco system that can't support the current fish numbers.. we have to be careful to not disrupt the current balance we have that is working right now. It's not the time for knee jerk reactions. If we are to raise/lower hatchery production is needs to be based on world class evidence current to the exact areas in Alaska it pertains to.. not some study from the lower 48..

Thank you for listing.. This is why am against prop 43.

Proposal 43: Oppose

PC149

Submitted by: Kevin Morrison
Community of Residence: Kenai,ak

Recommend reducing the daily bag limit for king salmon in Cook Inlet during the winter king fishery to 1 king per day with an annual limit of 2. Also recommend the same bag and seasonal limits for the kodiak island waters year round.

The winter king fishery around Homer has become extremely popular in recent years. Even though the majority of these kings are believed to be from Canada, surely some are native Cook Inlet kings. With the poor runs in every Cook Inlet drainage, every effort should be made to protect them. It does not make sense to have a fishery in Cook Inlet salt waters that is basically wide open when we are trying to protect salmon that return to Cook Inlet rivers.

Same for Kodiak. The king fishery around kodiak has become extremely popular. Many of these are large 40-50 lb fish that are likely from the Kenai river. But, with current regulations fishermen can keep 2 per day with no annual limit. Again it doesn't make sense to have fisheries where the likelihood of harvesting Cook Inlet kings is wide open while Cook Inlet drainages are closed due to poor runs.

To finish up, even though Cook Inlet freshwaters have been closed or restricted to king fishing for many years, the fishing pressure has just moved to other fisheries that are still harvesting Cook Inlet kings. They just aren't being caught in fresh water. If we are trying to protect Cook Inlet kings, every fishery that has the potential of harvesting a Cook Inlet king should be reduced.

Thank you.

PC150

Submitted by: Connor Murphy
Community of Residence: Sterling, AK

I would like to wholeheartedly voice my support for Proposal 83.

In my eyes, Proposal 83 is the most conservation minded option when it comes to preserving the King salmon we have left, while giving them the best chance to rebound in the future. The only way to have our King Salmon rebound is to get more fish into the river and to their spawning grounds, and I believe the measures outlined in Proposal 83 are a tremendous first step to achieving that goal. Not only is it a great first step, but it is well within ADF&G's rights to implement these changes regardless of pressure from other user groups.

The King Salmon is one of our states most iconic and important animals, and it deserves to be treated that way. Mismanagement by the department over the past 40 years has driven these fish to the brink of extinction, and I believe Proposal 83 is the first step that we need to take to start showing these fish the respect that they deserve.

Proposal83: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a lifelong fisherman. I have fished in Alaska for 40 years. I was a drift boat fishing from 1990 until 2006 on the Kenai, Kasilof, and Gulkana rivers. Since then I have continued recreational, and personal use fishing for salmon on the same rivers and also saltwater fishing out of Seward, Homer, and PWS. Over the years there has been a noticable decline of King salmon. The fisheries must be managed for abundance before it's too late to recover a healthy return of Kings.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye in river goals.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

David Musgrave
Indian, AK

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

Salmon hatcheries support my way of life in many regards. Members of my family, friends and I all depend on the sustainability of salmon returning every year as a food source, a business, and for the wellness of the tourism industry. It sustains my subsistence harvests as I prepare food for my family for the winter. It sustains salmon harvest for me as a commercial fisherman and sustains members of my family and friends as sport fishing guides. The industry of sport fishing for salmon around Seward almost completely relies on hatchery salmon and would destroy the tourism built around salmon fishing here. Guidelines for fishing put forth by fish and game ensures we target hatchery fish instead of the wild runs therefore protecting these wild runs. A decrease in hatcheries would mean harvesting more wild fish unless the plan is to decrease ALL salmon fishing in Alaska. In this current economy, I don't think Alaskans can afford to take a decrease in salmon fishing in any part of the salmon industry. It would be detrimental across the board. Not to mention it would leave fish management to allocate the cutbacks for salmon fishing. That begs the question: would each area of salmon harvesting get cut equally or would one area of industry end up taking an unfair portion of the cut? If so, can you clearly outline which area of salmon fishing will be most negatively affected?

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Jenny Nakao
[redacted]
Seward, AK

Native Village of Tyonek

February 6, 2024

Tyonek Fish and Game Advisory Committee
Attn: Donald Standifer, Jr
Tyonek, Alaska 99682
[redacted]

Re: Support of Proposals

Dear Mr. Standifer and Tyonek Fish & Game Committee members,

The Native Village of Tyonek is writing in support of the Tyonek Fish and Game Advisory Committee on their proposal 131, 142 and 217 in support of the Alaska Board of Fisheries 2023/2024 proposal book.

There was a public Tyonek General Meeting on January 20, 2024 and the proposals were discussed and was unanimously passed in support of these proposals 131, 142 and 217 as amended to closure of Cook Inlet commercial smelt fisheries only and not affect personal/subsistence use.

The Native Village of Tyonek relies upon our native lands and subsistence and commercial fishing as a way of life, to sustain us through the winter months, and are in support of these proposals.

If you have any comments or questions, please feel free to contact me at the contact information below.

Respectfully,

Johann Bartels
President, Native Village of Tyonek
[redacted]

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial fish in Homer, Alaska. The purpose of Proposal 43 is to bankrupt hatcheries and subsequently the fishermen and other businesses that rely on hatcheries. Plain and simple.
We are a three generation fishing family that relies on hatcheries for most of our income. This proposal would be devastating. Please strongly oppose it.

Sincerely,
Jessie Nelson
[redacted]
Homer, AK

Submitted by: Thomas Nelson
Community of Residence: Homer, AK

I am writing to comment on proposal 43 regarding hatchery operations and egg takes. I STRONGY OPPOSE proposal 43 , firstly this is outside the boards authority to regulated hatchery operations. This is firmly under the authority of ADFG. This proposal lists many so called "studies" that suggest hatchery production is affecting wild fish. There is no evidence of this, and none presented in the studies, merely speculation on the possibility that it could happen. This makes nearly all these white papers nothing more than an op-ed. They do not meet the bare minimum required to make such assertions. You would have to establish that there is overlap between species and if there is overlap are they present in sufficient numbers to have a negative effect. None of these studies even come close to that let alone factoring in all the other juvenile fish in the North Pacific. Hatchery salmon represent a small fraction of salmon in the ocean, and an even smaller fraction when compared to all nektonic species. This Proposal is politically motivated and has no justification being considered.

Thank You Thomas Nelson Homer, AK

Proposal 43: Oppose

NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.
1308 Sawmill Creek Road
Sitka, Alaska 99835
Office: (907) 747-6850 fax:(907) 747-1470

February 7, 2024

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
[redacted]

RE: **Opposition to Proposal 43**

Dear Chair John Wood and Board of Fisheries Members,

Thank you for the opportunity to comment on salmon enhancement related proposals submitted to the Alaska Board of Fisheries for the 2024 Upper Cook Inlet Board of Fish meeting.

I am the General Manager of The Northern Southeast Regional Aquaculture Association or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25 member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons form our region. Our board has broad representation from our region and at our Fall November 9th, 2023, meeting, our 25 member board passed a **unanimous** resolution, with no abstentions, **strongly opposing** proposal **43**. This proposal is opposed by ADFG in their staff comments and is likely beyond the Board's authority as well, as outlined in the Board's Department of Law comments regarding this proposal.

NSRAA strongly encourages the BOF to take no action on proposal 43. Proposal 43 has been submitted to the BOF with similar language a total of 8 times since 2005, in regions from Southeast to Prince William Sound, to Lower Cook Inlet to Kodiak. The majority of these proposals, five out of the eight, are asking for a significant reduction of hatchery production by 75% or greater. For nearly two decades these proposals have not been acted upon by the Board of Fish and NSRAA encourages the board to take no action on proposal 43. The current proposal before you is the most recent submission, which take up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

Summary of BOF proposals submitted by the Fairbanks AC(FAC) or individual members of the FAC.

Year	Proposal #	Mtg/Region	Submitted By	Proposal Summary
2005	38	Prince Willam Sound	FAC Member	Reduce chum production 50% of 2003 level
2006	155	Southeast	FAC Member	Reduce chum production 50% of 2003 level
2008	81	Prince William Sound	FAC	Reduce chum production to 24% of 2000 levels
2011	115	Prince William Sound	FAC	Reduce chum production to 24% of 2000 levels
2018	ACR2	BOF Work Session	FAC Member	Cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000
2021	54	Prince William Sound	FAC Member	Reduce hatchery production to 24% of 2000 levels.
2023	43	Lower Cook Inlet	FAC	Reduce hatchery production to 25% of 2000 levels.
2023	59	Kodiak	FAC	Reduce hatchery production to 25% of 2000 levels.

At submission Proposal 43 had contradictory language regarding the percentage of hatchery reduction sought in the proposal. It was so unclear that the FAC submitted RC029 at the LCI meeting clarifying their intended percentage reduction of pink salmon.

> **Fairbanks AC Clarifying Comments submitted at LCI (RC029)**
> *"**For clarification**, this should read: Reduce hatchery egg production permitting **to** 25% of the year 2000 production. Further, because each hatchery within the Cook Inlet Aquaculture Association (CIAA) PNP has its own egg permitting limits, the intent is to limit each individual hatchery accordingly. Note: The 2000 "promise" of reduction was only **by** 25%. This would not sufficiently reduce CIAA hatchery stocks. The clear intent of Proposal #43 is to **significantly decrease pink salmon production** [emphasis added] at a time when pinks are threatening entire ecosystems and other salmon and marine species."*

According to BOF Department of law comments provided to the BOF at the LCI meeting regarding proposal 43 the significant reduction in production in proposal 43 is likely beyond the Board's authority.

> **Dept of Law Comments for LCI regarding Proposal 43 (pg 3)**
> *"Proposal 43: This proposal would amend the Basic Management Plan to reduce hatchery production of pink salmon in Cook Inlet to 25% of the year 2000 production level, apparently without defining "production level." As proposed, this is likely beyond the Board's authority, which is limited by AS 16.05.251(f) and AS 16.10.400 - 16.10.440. "*

While the FAC clarifying comment does indicate intent to significant reduce pink production, it still lacks clarity on if this would apply to other salmon species produced at CIAA under each facilities Basic Management Plan. CIAA also produces sockeye and coho salmon at

their facilities. As written it would appear to apply to all salmon produced by CIAA further impacting commercial, sport, personal use and subsistence fisheries.

The ADFG has also submitted comments on proposal 43 and they are in opposition to this proposal.

> **Dept of Fish and Game Comments regarding Proposal 43 (LCI Mtg RC 2 pg 95-98)**
> *"DEPARTMENT COMMENTS: The department OPPOSES this proposal. Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will have a positive impact on wild salmon stocks. No evidence has been presented in this proposal to support the proposed reduction in permitted pink salmon egg take level."*

The ADFG has completed Bering Sea and Gulf of Alaska salmon genetic studies and is continuing the evaluation of potential enhanced produced salmon affects in ocean basin wide efforts. The Western Alaska Salmon Stock Identification Program (WASSIP) was undertaken from 2006-2009. This study was the first to determine ocean areas where overlap of chum and sockeye salmon stocks occur based upon genetic sampling. This study demonstrated the minimal overlap of chum salmon produced in the Western Alaska region and other regions of Alaska with enhanced production. This information is available at; https://www.adfg.alaska.gov/index.cfm?adfg=wassip.main

The more recent multi-national effort at continuing this type of research is the International Year of the Salmon study (IYS), which is ongoing, yet initial results indicate a confirmation of the WASSIP study showing minimal overlap of Western Alaska produced salmon and enhanced salmon production (including pink salmon) from other regions of Alaska. The BOF received an oral report at the 2023 BOF Hatchery Committee meeting with the results from the 2022 sampling. This report may be found at; https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/hatchery/1-overview-of-scientific-understanding-of-salmon-competition-at-sea-and-an-update-on-research.pdf

More recently NOAA issued a report (November of 2023) looking at the recent Bering Sea and Gulf of Alaska heatwaves and their impact on AYK region chum salmon. This study indicated that the collapse of the recent AYK region chum salmon was likely the result of the marine waters warm period of 2014-2019.

> **Excerpt from NOAA November 2023 Marine Heatwave Impacts on Western Alaska Chum Salmon**
> *"After looking at nearly two decades of survey data, scientists found evidence to suggest that recent marine heatwave events in the eastern*

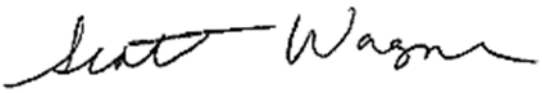
Bering Sea and the Gulf of Alaska may have played a key role in juvenile chum salmon survival. Scientists also suspect this impacted subsequent adult returns to western Alaska rivers."

This report may be found at; https://www.fisheries.noaa.gov/feature-story/new-evidence-marine-heatwave-impacts-western-alaska-chum-salmon

Proposal **43** will significantly reduce CIAA pink salmon production, and potentially sockeye and coho salmon, by 75%. This proposal lacks science-based support, is punitive in nature, is opposed by ADFG, beyond BOF authority and does not address an allocation issue in the LCI area. The proposal, whether intentional or not, would have tremendous financial impacts for CIAA and result in a reduction and likely elimination of most enhanced salmon production in the region, including enhanced sockeye and coho production.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,



Scott Wagner
General Manager

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, commercial, and sport fisheries in Cordova, Alaska. Salmon hatcheries and the way Alaska has approached their development is something to take pride in. I am grateful for the folks before me that helped develop our hatcheries and their impact in preserving wild stocks while maintaining a fisheries economy in lean years.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible

resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Tracey Nuzzi
[redacted]
Cordova, Alaska

Submitted by: Eric Nyce
Community of Residence: Homer, Ak

Proposal 178

I strongly support this proposal. The duration of the coho fishery appears to have slipped through the the cracks in regards to the severe conservation restrictions which have already been implemented to protect returning Late Run Kenai River Kings. There is no justifiable reason to have any participation in a fishery that is yet to have any appreciable numbers of the targeted fish in-river. By shortening the coho season to align with the perceived season, it removes the option for sport fishermen to legally but illicitly catch and release chinook salmon.

As the Author of this proposal, my intent is to protect Late Run Kenai River Kings. If the word “Shall” becomes a sticking point as an additional conservation tool for the BOF, I am comfortable removing this to ensure the coho season is reduced to help conserve King Salmon.

Proposal 151

I strongly support this proposal. Regardless of the incredibly restrictive conservation tools which have been placed on commercial fishermen, Early and Late Run Kenai River Kings continue to be distressed stocks. With commercial fishermen not having fished Early Run Kings since the 70’s it is possible that in-river users’ participation in mixed stock fisheries are having an effect on spawning king salmon. Adding an additional day and expanding the waters for drift-only days is a very restrictive conservation tool, however the severity of it is in line with the complete closure of the entire ESSN fishery. Additional conservation efforts are needs to help ensure the viability of future fisheries.

Proposal 88

I strongly support this proposal. When the in-river commercial king fishery closes, the pressure on spawning king salmon from outboard noise pollution and water turbidity maintains or increases. If other regulations are not implemented to restrict motorized activity on the Kenai River, this proposal presents an alternative way to reduce the impact on King Salmon spawning grounds. Additional conservation measures, despite their severity, are needed in river, as the entire abolishment of the ESSN fishery is not producing the desired effect of getting substantially more Kings into the Kenai River. This will obviously have a severe economic impact on the in-river guided commercial fishery, however it is in line with the conservation measures placed on the ESSN fishery. The department states that they oppose this because it limits access to a fishery with a harvestable surplus. However, that is exactly what has been done to the ESSN fishery which sees an exploitation rate of 0.4% of the returning king run when limited openings are allowed. It is duplicitous of the department to support one user group over another with similar impact on the king fishery.

Proposal 86

I strongly support this proposal. This places paired conservation measures to protect Late Run King Salmon on in-river fisheries. The department states that they unilaterally restricted bait until the August 31, 2023 to protect spawning salmon, however this does not go nearly far enough to protect kings. By the departments numbers, there were at a minimum 5,962 Large Late Run Kenai River Kings (43% of the entire run) that were yet to spawn in the Kenai River watershed when bait was opened for the coho fishery in 2023. Eliminating bait in the coho fishery to protect these spawning kings is a proportional conservation tool in-line with other methods already implemented on other user groups.

Proposal 85

I strongly support this proposal. As the study listed in the proposal states, dangerous levels of noise pollution are being directed at Kenai River King spawning grounds. This proposal does not mandate that the Kenai River be drift only for all users, only those engaged in sport fishing. The Department of Fish and Game, dipnetters, sight seeing trips or any other motorized vessels that conforms to the current regulations would be exempt from

this proposal. This proposal solely restricts those vessels engaged in or transporting individuals who will engage in a sport fishery. This would be a very restrictive conservation measure, however the impact on in-river user groups would still be less that what the ESSN fishery has been forced to sacrifice to protect LRKRK's.

As the Author of this proposal, an alternative I considered was to not allow any guided activity in any capacity out of motorized vessels if the ESSN fishery was shut due to paired restrictions. This would avoid having any additional cost for the private person to participate in the fishery.

Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose	Proposal 75: Support
Proposal 76: Support	Proposal 77: Support	Proposal 78: Support	Proposal 80: Support
Proposal 81: Support	Proposal 82: Support	Proposal 83: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 94: Support	Proposal 95: Oppose	Proposal 96: Oppose
Proposal 97: Support	Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 104: Oppose	Proposal 106: Oppose
Proposal 107: Oppose	Proposal 108: Oppose	Proposal 110: Support	Proposal 112: Oppose
Proposal 114: Support	Proposal 116: Support	Proposal 117: Support	Proposal 119: Support
Proposal 120: Support	Proposal 121: Support	Proposal 122: Support	Proposal 123: Support
Proposal 124: Support	Proposal 125: Support	Proposal 128: Support	Proposal 129: Support
Proposal 130: Support	Proposal 131: Support	Proposal 133: Support	Proposal 135: Oppose
Proposal 136: Oppose	Proposal 137: Oppose	Proposal 141: Oppose	Proposal 143: Support
Proposal 144: Support	Proposal 145: Support	Proposal 146: Support	Proposal 147: Support
Proposal 148: Support	Proposal 149: Oppose	Proposal 150: Oppose	Proposal 151: Support
Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose
Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose	Proposal 159: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose
Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 187: Support	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Support	Proposal 194: Oppose
Proposal 195: Support	Proposal 196: Support	Proposal 197: Support	Proposal 198: Support
Proposal 199: Support	Proposal 200: Support	Proposal 203: Oppose	Proposal 204: Oppose
Proposal 205: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose
Proposal 214: Oppose	Proposal 215: Support	Proposal 217: Oppose	Proposal 231: Oppose
Proposal 232: Oppose			

February 8, 2024

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Opposition to Proposal 43

Dear Chair Wood and Members of the Alaska Board of Fisheries,

OBI Seafoods operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in Alaska seafood processing. Sustainable salmon stocks are the single most important issue to the long-term viability of our company and the ability to maintain our industry's contribution to the state economy. We are steadfast supporters of Alaska's hatchery programs which have provided for Alaska's fisheries for nearly fifty years and appreciate their mission to coincide without adversely affecting salmon stocks.

We are writing to express our strong opposition to Proposal 43, which seeks to significantly reduce pink salmon production. As advocates for sustainable fisheries management and economic prosperity of coastal communities, we believe that Proposal 43 presents substantial risks to Alaska's salmon hatchery programs and the diverse stakeholders they serve.

Commercial fisheries are not the only benefactors of hatcheries
Hatchery programs encompass a wide array of benefits that resonate across diverse user groups within Alaska's communities. Whether it be subsistence, personal use, sport, or commercial fishing, hatchery-produced salmon plays an integral role in meeting the needs and preferences of each user group. By ensuring the consistent availability of hatchery-origin salmon, these programs facilitate equitable access to this invaluable resource, regardless of the fishing style or purpose.

Hatcheries are responsibly managed
Responsible management lies at the core of Alaska's salmon hatchery program, underlined by stringent oversight and regulation administered by the Alaska Department of Fish and Game (ADFG). Through meticulous attention to detail and adherence to scientific principles, the ADFG ensures that hatchery operations are conducted with the utmost care and consideration for environmental sustainability.

At the heart of this management approach is a commitment to data-driven decision-making, where scientific research and empirical evidence serve as guiding principles in shaping policy and operational protocols. By leveraging cutting-edge research methodologies and monitoring techniques, the ADFG gains valuable insights into the ecological dynamics of salmon populations, allowing for informed assessments of hatchery practices and their broader impacts on marine ecosystems.

Additionally, the ADFG's oversight extends beyond compliance with regulatory standards; it also includes a public process via their hatchery Regional Planning Teams. Through ongoing collaboration with industry stakeholders, community members, and scientific institutions, the ADFG fosters a culture of dialogue and

collaboration aimed at refining management strategies and enhancing the overall effectiveness of hatchery operations.

Hatcheries reduce pressure on wild stocks
Hatcheries play a pivotal role in alleviating pressure on wild salmon stocks, especially during periods of reduced abundance or environmental challenges. By supplementing natural populations with hatchery-produced salmon, hatcheries effectively mitigate the strain on wild stocks and help maintain the delicate balance of ecosystems. This supplementation strategy not only bolsters the overall abundance of salmon but also provides a crucial buffer against fluctuations in natural populations caused by factors like habitat degradation, climate change, and predation.

Salmon produced by hatcheries are sustainable and RFM and MSC Certified
The certification and sustainability of Alaska's salmon fisheries, encompassing both wild-caught and hatchery-origin salmon, represent a testament to the state's commitment to responsible resource management. This commitment is exemplified by the consistent recognition received from esteemed programs such as Responsible Fisheries Management (RFM) and the Marine Stewardship Council (MSC).

These certifications serve as external validations of Alaska's fisheries management practices, providing a seal of approval that underscores the dedication to sustainable harvesting and environmental stewardship. The acknowledgment of both wild and hatchery-origin salmon within these certifications reflects a comprehensive approach to fisheries management that recognizes the interconnectedness of natural and hatchery-supplemented stocks.

In conclusion, Alaska's salmon hatchery program stands as a shining example of responsible resource management and sustainable salmon harvests that profoundly benefit all Alaskans. Through decades of meticulous oversight and dedication to scientific principles, the state has fostered a robust hatchery system that not only supplements wild salmon populations but also contributes to the economic vitality and cultural heritage of coastal communities. By fostering dialogue and cooperation among industry leaders, government agencies, and local communities, Alaska can chart a course towards a future where salmon populations thrive, and coastal economies flourish.

Thank you,

John Hanrahan
OBI, CEO

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the commercial and personal use fisheries in Kodiak, Alaska. Salmon that start their lives in Alaska hatcheries and then return after growing at sea provide one-third of Alaska's salmon catches each year and often the same amount of value. The fish are critical to regions like Prince William Sound and Southeast. Alaska's salmon enhancement program is a wonderful and sustainable program that provides a degree of certainty to salmon fishermen each year - commercial, sport, subsistence and personal users. Many people forget or don't realize that hatchery-reared salmon provides for all users, not just commercial fishermen! The hatchery program should be continued and supported by Alaskans.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders

from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Elaine O'Brien
[redacted]
Kodiak, Alaska

February 08, 2024

Dear Chairman Wood and Board of Fisheries members:

My wife and I and our three children have fished the Kenai River beginning over 20 years ago. Sportfishing is an important part of our family, allowing us to spend quality time on the most beautiful river in the world. Unfortunately, we have seen a significant decrease in the number and size of Kings over the years.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Steven O'Hara
Anchorage, AK

PC162

Submitted by: Roger Okamoto
Community of Residence: Sacramento CA

Pro. 43 should be supported in the strongest possible terms. Commercial interests are destroying the Wild stock fisheries by over stocking Pink smolts. The evidence is in the scientific studies but past Board Members stuck the groups head in the sand and did not acknowledge the science. Too many Pink salmon benefit no one but a few greedy Commercial interests. The fish are of such low value Ex Vessel that millions have to be harvested just to make fuel costs back. Please stop stocking Pink smolts and hold the hatcheries to the reduction on the pre-2000 number quotas.

Proposal 43: Support

PC163

Submitted by: Makena O'Toole
Community of Residence: cordova alaska

I am writing to oppose Prop 43. I personally am growing tired of this witch hunt. All these anti hatchery proposals saying our fish are out competing wild fish in the ocean while bristol bay has been having back to back record runs is ridicules. The hatchery programs are doing exactly what they were intended to do. Providing coastal fishermen with a reliable source of income to counteract the erratic nature of wild salmon runs. No one is talking about climate change as a possibility or the ever growing number of people chasing these fish around with dipnets in their spawning beds. In PWS our wild pink runs that are in the closest proximity to the hatcheries are as strong as ever. Hatchery fish not only provide the life blood of our costal communities but alleviate fishing pressure on wild stocks.

Proposal 43: Oppose

PC164

Submitted by: Paul Owecke
Community of Residence: Trempealeau, Wisconsin

Thank you BOF members for the opportunity to comment. I oppose proposal 43. I currently am a permit holder in the PWS setnet fishery and have been since 1983. Prior to set netting I have also been employed by ADFG as a Fish Culturist at several of their former Southcentral hatchery facilities.

I, and all PWS salmon harvesters, have been direct beneficiaries of the tremendous success and ongoing viability of PWS salmon returns both wild and hatchery enhanced. There has been demonstrable and sustained returns of both wild and enhanced stock's throughout PWS that have provided a dependable benefit to harvesters of every gear and user group, including sport, subsistence and commercial.

The current calls to reduce hatchery production, including Proposal 43, are relying on a perception that recent downturns in adult salmon returns, changes in at sea forage populations and a host of other negative consequences are the direct result of Alaskan hatchery releases. There has been undeniable changes in adult returns, forage populations and other consequences. However, there needs to be an honest acceptance that these consequences have developed at a time of the most rapid period of ocean warming to have possibly ever occurred. The extremely compacted period of time in which this warming has occurred has been the driver of many negative consequences, and there has been some significant benefits to certain salmon populations and forage populations as well. There have also been some stabilization of populations since the worst of the upturn in ocean temperatures. To generalize and pin any or all of the negative consequences of what we see in the

ocean environment on Alaskan salmon hatchery releases is not warranted and has the real possibility of being the driver of real negative consequences to those of us who depend on adult hatchery returns that benefit sport, subsistence and commercial harvesters.

Proposal 43: Oppose

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION

To: Alaska Board of Fisheries

RE: Opposition to Proposal 43

Dear Chair Wood and Board Members, February 8, 2024

Pacific Seafood Processors Association (PSPA) strongly opposes Proposal 43. PSPA is a seafood industry trade association comprised of major Alaska seafood processing companies that operate 34 facilities in 21 coastal communities across Alaska, from Ketchikan to Unalaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska salmon, Alaska pollock, cod, crab, halibut, and other species of Alaska seafood each year, and they include shore-based processors that have historically participated in and are fully dependent on the federal fisheries off Alaska managed by the Council. They have been at the forefront of supporting management systems based on sound science and sustainability principles, have invested heavily in infrastructure and operations in Alaska's remote communities.

Hatcheries in the Cook Inlet region and across Alaska are critically important to both fishermen (commercial and sport) and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon for their living. Processors need the volume of salmon in order to stay viable and operating for all fisheries, and hatcheries were established in Alaska with significant and necessary restrictions in the form of Alaska's Sustainable Salmon Policy and Genetic Policy. These are enhancement programs well supported by the state historically for the benefit of all Alaskans -- personal use, subsistence, sport, commercial. The research that is ongoing through the Alaska Hatchery Research Project is critically important to monitor and understand prior to making any changes.

Opposition to Proposal 43 is grounded in the fundamental need to protect the Cook Inlet Aquaculture Association and sustainable hatchery production in Cook Inlet and around the state. Reducing hatchery production to 25% of the year 2000 levels, as proposed, is short-sighted, will have a significant economic impact, and fails to acknowledge the public process and scientific evaluation, which highlights the complexity and nuance involved in determining hatchery production levels. The purpose of the proposal may be conservation, but the potential unintended consequences necessitate a more comprehensive and informed approach. Opposing Proposal 43 is essential to safeguarding the integrity and viability of hatchery operations and the broader ecological health of the Cook Inlet region. ***PSPA opposes Proposal 43, and the Board should oppose and reject Proposal 43, for the following reasons:***

Iterative Process: Hatchery-permitted egg take levels are established through an iterative process involving department staff, hatchery operators and stakeholders. The proposed and arbitrary

reduction of permitted capacity lacks clear evidence supporting that any positive impact on wild salmon stocks will occur, and no compelling reason or scientific evidence has been presented to justify the reduction in permitted pink salmon egg take levels.

Conservation Concerns: ADF&G opposes the proposal on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. The proposed reduction in egg take levels lacks a demonstrated conservation benefit and could disrupt the delicate balance between hatchery production and wild salmon populations.

Department Oversight: The Commissioner, since 2019 has not allowed increases in the permitted number of pink and chum salmon eggs, reflecting the department's proactive approach to managing hatchery production. This demonstrates the department's commitment to maintaining a careful balance between hatchery production and conservation goals without the need for external regulatory intervention.

Lack of Evidence: No definitive evidence has been presented in the proposal to support the proposed reduction in permitted pink salmon egg take levels. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact.

The Alaska seafood industry is facing economic conditions unlike any since the collapse of salmon value in the 1990s, except this time, it is across multiple species. Experts estimate Alaska and its coastal communities lost $2 billion in 2023: $1 billion in lost first wholesale revenues and $1 billion in decreased spending on vessels and facilities. Today's problems are a result of the confluence of multiple global and national economic factors occurring simultaneously, which are outlined in the following attachment. These are factors directly affecting the viability of Alaska's commercial fishing and processing sectors that are outside of BOF authority and control, but they are critical to understanding the fisheries the BOF manages. All fisheries are critical to the viability of fishermen and processors, especially right now, when the culmination of multiple global and national factors has created dire economic conditions.

Many communities across Alaska depend on the seafood industry - this economic crisis has emphasized this point. Removing 75% of the production of salmon hatcheries would add another economic blow to the seafood industry and its fishing-dependent communities.

Thank you for your consideration.

Sincerely,

Julie Decker, President
Pacific Seafood Processors Association

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION

2023: A perfect storm of economic circumstances hits Alaska seafood

Many coastal communities in Alaska depend on Alaska seafood for food security and for an economic foundation that sustains their economies. Often, the health of the Alaska seafood industry and the health of these communities are interdependent. In 2023, the culmination of multiple economic factors has created dire economic conditions, resulting in a free-fall of seafood prices, millions of dollars in losses and, in some cases, processors had to stop buying fish to reduce further losses.

Experts estimate the state and its coastal communities lost $2 billion in 2023: $1 billion in lost first wholesale revenues and $1 billion in decreased spending on vessels and facilities. Fishermen and processors have borne the brunt of these impacts to date. With conditions unlikely to notably improve in 2024, the effects will continue to affect communities and more businesses and residents across the state. The Alaska seafood industry is facing economic conditions unlike any since the collapse of salmon value in the 1990s, except this time, it is across multiple species.

The higher standards in the U.S., for fisheries management, environmental and social considerations, and worker safety, mean it costs more to produce seafood compared to countries with lower standards. In Alaska, those costs are even higher due to the remote location of most of the fisheries and processing operations. These safeguards help keep our fisheries sustainable and ethical, yet, we face an uneven playing field from countries that harvest seafood without similar regulatory costs.

Today's problems are a result of the confluence of at least a dozen global and national economic factors occurring simultaneously, a few of which include:

1) **Increased costs**
    - Total statewide wages for seafood processing workers increased 30% from 2021 to 2022. They had previously doubled from 2002 to 2020.
    - Operational costs for fishermen and processors increased due to historically high inflation in 2021 and 2022.
    - Shipping - International shipping rates spiked between 100% and 1000% from 2020 to 2022, and have subsequently come down. Domestic shipping rates increased approximately 20% during the same period, 14% of which was attributed to increased fuel costs.
    - Supply chain of custody costs to ensure the sustainability and social responsibility of US fisheries mainly due to other 'bad actors', such as China
    - Cost of compliance with U.S. environmental standards relative to other countries
2) **Excess inventories** of several abundant species harvested in Alaska and other countries in 2022 and 2023, including sockeye and pink salmon, sablefish, and pollock, which will likely continue into 2024.

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3) **Decreasing demand** as consumers react to inflation and post-COVID conditions
4) **Russian war on Ukraine**, leading Russia to sell seafood on the global market at historically low prices in 2023 to secure cash, lowering seafood value overall
5) **Unfair trade policy**, including key trade relationships that reduce the value of Alaska seafood relative to other countries with lower tariffs. This includes Russia's 2014 ban on importing US seafood into Russia, while Russia exports its seafood to the U.S. via China

Clearly, there's much that must be done to stabilize Alaska's seafood industry, beginning with good information about the problems we are facing today. That's why the Board of the Alaska Seafood Marketing Institute explained the "extraordinary circumstances" from a market perspective, and the United Fishermen of Alaska hosted and recorded a webinar with seafood processors to discuss the current challenges of seafood markets. While many must take measures to survive, we need to look beyond today and toward a future in which everyone thrives. Alaskans need to create a public dialogue about the problem and the solutions in Alaska's fishing communities, Juneau, and Washington DC.
At the federal government level, PSPA has identified several changes that would help:

1. **Improve and expand existing agency functions that support US seafood, including:**
   - Improve coordination and collaboration across multiple federal agencies that affect the economic viability of Alaska seafood via the implementation plan for NOAA's National Seafood Strategy
   - Include seafood in USDA Foreign Agricultural Service trade missions
   - Increase government purchases of Alaska seafood
   - Improve government policies to assist in recapitalization, vessel construction, tax structures, workforce accessibility, energy, and infrastructure
   - Increase government funding for new product development, testing, promotion, and marketing of US produced seafood

2. **Integrate US seafood production into national food policy strategies and USDA programs designed to support domestic food production, including:**
   - Create an Office of Seafood Policy and Program Integration within USDA to fully integrate US seafood into USDA policy strategies and programs
   - Expand eligibility of USDA low-interest loans or loan guarantees to fishermen and processors
   - Fully integrate seafood and seafood nutritional guidance into national strategies for improving public health and nutrition

3. **Restore fairness and reciprocity for international trade in U.S. seafood products, including:**
   - Embed seafood expertise and leadership in the office of the U.S. Trade Representative to elevate seafood in trade agreements
   - Improve trade policy via USTR and other agencies to create a more reciprocal tariff structure for seafood exports and imports
   - Develop more effective tools, like harvest certificates, for monitoring supply chain traceability and deterring Illegal, Unreported, and Unregulated (IUU) fishing
   - Resolve the unbalanced and unfair seafood trade relationship between Russia and the U.S., including support for the Alaska delegation's efforts to block imports of Russian seafood processed in China or other countries

My Comments for the Board Of Fish UCI Meeting February 2024

Submitted by Daniel Page on 7 February 2024

My name is Daniel Page and I appreciate the opportunity to provide my comments and participate in this process. I am pleased to see that Mr. Israel Payton is still part of this process.

I submitted proposals 219, 238 and 239. Additionally I am strongly opposed to proposal 242!

I am a 22 year Army veteran. I retired as a Lieutenant Colonel in 2010, and after I retired my summer job has been sport fishing for salmon. I am not a guide, and I do not use a boat to fish. I am not a Simms wearing, G-Loomis using Fly Fisherman. I am a bank fisherman, and I primarily use vibrix lures and bait when it is permitted. I fish every day June through August when the fish are there, the water is good, and regulations permit. I am also a Certified Six Sigma Master Black Belt.

I submitted proposal 219.

To Close fishing for all species within the confluence of Unit 2 waters when sport fishing for king salmon is closed as follows:

My cabin is located on the Kashwitna River. I fish the Susitna River Unit 2 creeks for kings and coho. When king fishing is closed on the Parks rivers, I often take my dog swimming at the confluence of Sheep Creek. Over the past 6 seasons I have observed how much fishing is taking place on the Parks Unit-2 creeks during periods were fishing for king salmon is closed.

Allowing fishing for resident species during periods when closed to king fishing in Unit-2 of the Parks highway Susitna River Drainage.

The "Loophole", and how did we get there?

It looks like it started in 2017, when Joe Mathis submitted Proposal 219. He asked the BOF for permission to fish for resident species on Montana Creek, when the water is otherwise closed to fishing for kings. ADF&G did not support this proposal, and neither did the BOF. The proposal failed 0-7

The Department issued preseason emergency orders closing streams within unit 2 to fishing for king salmon **in 2018 and 2019** to address king shortages. **BUT**, **These emergency orders allowed fishing for fin fish species other than king salmon on days normally closed in regulation**.

Four years ago proposal 222 was submitted by ADF&G. That proposal **Allowed fishing for Resident Species on days closed to king salmon fishing in Parks Unit-2 waters.**

The Board of Fish approved proposal 222 at the 2020 meetings.

From 2020 Proposal 222: ..."Currently fishing for rainbow trout and other resident species is closed in the lower sections of streams within unit 2 of the Susitna River drainage (Parks Highway streams) on

days closed to king salmon fishing. **This is a long standing regulation put in place to prevent king salmon being targeted under the guise of trout fishing on days closed to king fishing**.

And also from Proposal 222: ….. The Department issued preseason emergency orders closing streams within unit 2 to fishing for king salmon in **2018 and 2019** to address king shortages. **These emergency orders allowed fishing for fin fish species other than king salmon on days normally closed in regulation** to mitigate lost opportunity to fish for king salmon. The result was 20 additional days of fishing opportunity for trout anglers with few enforcement complaints.

Over the past six seasons, I have observed how this change has affected the fishing effort on the Susitna River Unit-2 waters. I believe that the changes that resulted from the 2020 proposal **have created a "loophole" for sport fishermen to target and catch king salmon during periods when the rivers are closed for king salmon fishing. The amount of fishing for kings is increasing every year!**

My proposal 219 will close that "loop hole". Proposal 219, if approved, would close fishing for all species within ¼ mile of the confluence of Unit 2 waters when sport fishing for king salmon is closed.

As stated above in the approved proposal 222, I believe that the intent of the 2020 proposal was to allow Simms wearing, G-Loomis using, hard-core Fly Fishermen to target rainbow trout and other resident species. I also believe that any self respecting Simms wearing G-Loomis using hard-core Fly Fisherman would not consider fishing at the confluence of any Susitna River Unit 2 rivers.

Additionally I believe that there is a good reason for the current closures in the regulations for king salmon fishing on the Susitna River Unit 2 water. Specifically the two four-day closures in late June, and the after 4th of July closure. As noted in proposal 222, these closures are in the regulations so that the **spawning king salmon get a break from the fishing pressur**e.

The current "loop hole" effectively eliminates this desired goal.

* Willow Creek has four mouths, therefore four confluences, so the distance may not work on Willow.
* Sheep creek is simpler, and a quarter of a mile from the confluence should work well.
* The confluence of Montana Creek should also work with a quarter of a mile.
* Goose Creek is closed to king fishing by reg and the mouth is too far for most loophole anglers.
* Caswell Creek may be more challenging because the confluence moves depending on water height.

I suggest that the Board could direct ADF&G to use proposal 266 from the 2011 BOF meetings that asked for "No fishing from boats at Willow Creek confluence". This proposal was carried as amended by the BOF, with locations and distances for marker signs. I could not find the R/C that amended this proposal.

When I wrote this proposal in April 2023, unit-2 of the Susitna drainage was closed to king salmon fishing by emergency order #23-3445 on March 2nd. S**o, in 2023 the only way to catch a king salmon on a Unit-2 creek is to do so with fly fishing gear despite the fact that fishing for king salmon is closed.**

Most of the king salmon caught "incidentally while fishing for other species" will be caught near the confluence of Montana, Sheep, and Willow creeks.

As I stated earlier, I have observed fishing for King salmon in Unit-2 creeks for the past six seasons. Mostly on Sheep Creek, but I went to most of the popular creeks (Willow and Montana).

I have never seen any law enforcement presence or ADF&G personnel when I was present.

The Parks Unit-2 water was closed by emergency order every year from 2018-2023 except for 2021. In 2021 an emergency order limited fishing for kings to Sundays and Mondays only.

I have observed an increase in king salmon fishing during closed periods over the six years.

During the first two years (2018 & 2019) there was little fishing activity during king closures. I consider myself to be fluent and up to date on any emergency order published for any of the rivers that I fish regularly. I read the emergency orders closing the Parks Unit-2 creeks in both 2018 and 2019, and I did not notice the change allowing fishing for other species. I do not believe very many other anglers realized the change either. **The result was very little "loop hole" fishing during those two seasons.**

My observations were the **same in 2020 and 2021**, and I believe that again the loop hole had not been discovered, and word had not gotten out. Even during the legal Sunday and Monday openings in 2021, there were very few anglers targeting kings. I did see a few fly fishermen on weekends in late June and over the fourth of July weekend.

During the 2022 season I saw much more fishing activity. I saw several persons using 8 or 10 weight fly rods with popular flies used for salmon. There was more fishing activity particularly on weekends. **All fishing activity that I observed in 2022 was using fly fishing equipment.**

This past summer the pressure increased significantly, and for the first time, I saw fishermen using **spinning reels with artificial lure**s. Over the 4th of July weekend I observed several persons fishing, again mostly with spinning reels, and two persons were **even using bait** and targeting kings.

Clearly the word has gotten out, and the fishing tactics have changed. It needs to be stopped! If the Board does not approve my proposal this loophole fishing will get worse in the coming years.

I strongly recommend that the Board approve my proposal 219 and remove the loophole that allows anglers to target king salmon at the confluences of Unit-2 waters during periods when king fishing is closed.

The regulations need to **create a no fishing zone at the confluence of Susitna River unit-2 waters** when fishing for king salmon is closed. This change will remove the loop hole that was created in 2020.

My proposal calls for a distance of a quarter of a mile. This is not a hard/firm distance, and I have no issue with amending my proposal if the Board realizes a better solution after committee discussions. I would just like to see something done to close this loophole.

I submitted proposal 238.

The river that I spend the most time fishing on is the Little Susitna River at the Little Susitna Public Use Facility (LSPUF). My fishing experience on the Little Susitna River over the past several years convinced me to submit **proposals 238 and 239**.

My proposal 238, if approved, **would establish a motor size restriction for the Little Susitna River**.

This proposal is not so much about the size of the motor on a boat, as it is about the bank erosion and loss of fish habitat caused by the boats with larger motor sizes.

As I wrote in my proposal about fishing at the Little Susitna PUF. There is a **cute informational sign** on the walking path just down the trail from the main parking lot by the boat launch. **This sign informs bank fishermen to be careful while fishing along the bank** of the river, so that we do not cause bank erosion to critical salmon spawning habitat. I now laugh at this sign when I see it because I have watched over the years how much erosion every motorized watercraft causes every day of the fishing season. It is not the few bank fishermen who are causing the majority of the habitat erosion on this river, it is the boats!

The worst boats on the river that cause the most erosion are the s**mall 12-15 foot "jet boats**". These small fast boats have only 2 seats and no deck. The back of the boat is all motor. I have no idea how many HP these boats have, but my experience in observing these boats is that every pass causes massive erosion. It is this type of motor boat that I feel does not need to be used on this river!

I understand that the Board of Fish is limited on it's authority to restrict boats and motor sizes on fishing waters. However because this is a fish habitat issue I am asking for this proposal to receive consideration.

I understand that the ADF&G position on my proposal is for the Board to take No Action because the Board does not have the authority to restrict motor sizes on rivers.

I believe that legal counsel will need to opine on this question of BOF authority.

I have researched this issue and actions taken or not taken by the BOF at their past six meetings, and the research shows that on some proposals the BOF took No Action, but on many other proposals that are similar to my #238, the BOF did discuss the proposals and vote. In a few cases proposals on motor restrictions have even been carried by the BOF, usually as amended with a record copy.

I would also like to remind the Board that my proposal applies to the **Little Susitna River at the Little Susitna Public Use Facility (LSPUF)**. **This is an ADF&G facility**, and not a State Park campground and boat launch.

For several years there were ADF&G personnel conducting **water sampling for hydro carbons on the Little Susitna River**. I do not know of any Department testing or monitoring of bank habitat erosion on the Little Susitna River. However I can show you places below the boat launch where more than 10 feet of bank has fallen into the river over the past few years.

Here is what I found in my research of actions taken or not taken by the BOF at their past six meetings, which were in the years 2020, 2017, 2014, 2011, 2008, and 2005.

At the 2020 BOF meetings there were **six proposals** addressing motor restriction. Five proposals were on the Kenai River. Of those, the Board took No Action on four. Two were withdrawn by the proposer, and two were No Acton based on the voting on the other proposal #168, which Failed 0-6. The final proposal on motor restrictions, #169 was for the Kasilof River. #169 also Failed 0-6.

During the 2017 BOF meeting, there were **four proposals** addressing motor restriction. #178 Failed 0-7 and two other proposals were voted No Action based on that decision. The other proposal #199 also Failed 0-7.

I found that at the 2014 BOF meeting there were **seven proposals** in the Kenai River vessel restriction area. Five of them Failed 0-7, and two were No Action based on the vote on another proposal. Also during the 2014 meetings was proposal 316 that required the use of 4-stroke outboard motor on the Little Susitna River. This proposal Carried 5-2 as amended and restricted the use of 2-stroke motors on the Little Susitna River

During the 2011 BOF meetings I only found **two proposals** about motor restrictions. The first #275, limiting motors on the Little Susitna River to no more than 25HP. The Board took No Action on this item. The second proposal #282 Carried.

At the 2008 BOF meetings there were **several proposals** about motor restrictions. Prop 221 Carried as Amended, proposals 290-296 were voted No Action by the Board, but prop 301 Carried as Amended. Proposal 347, limiting motors on the Little Susitna River to no more than 25HP(just like in 2011), Failed (but was voted on).

I found **one proposal of interest from the 2005 BOF meetings**. Proposal 279, Kenai River asking to increase motor size from 35HP to 50HP. The Board took No Action because the BOF lacks authority, AK DNR has authority to regulate HP on the Kenai River

As you can see it is hard for a concerned angler to write an affective proposal on motor size restrictions based on action taken by the BOF in previous meetings.

I have fished from the bank on the Little Susitna River on average 52 per year over the past 12 years. This fishery at the **Little Susitna Public Use Facility is primarily a boat access fishery**. Every day that I fish there I have several boats pass me. Every boat that passes me causes bank erosion, but there are some boats that are in my opinion, too big or too powerful and they cause excess erosion.

I have no experience with boats or motors, so I do not know what the motor size limit should be. That is why I did not specify any motor size restrictions in my proposal.

There are not many boats with propellers on the motor used on the Little Susitna River. Most of the motors use “jet” motors. After I wrote this proposal in April 2023, I paid more attention to motor sizes used on boats on the Little Susitna River. I noticed that most motors were 50 HP or smaller, with some 100 HP jet motors.

I would like to see a limit of 120 HP motors. As I understand it a motor that says 150 HP with a propeller, is in fact a 120 HP motor with a jet. I understand that there is a 20% reduction when the propeller is replaced with a jet. Additionally, I would like to see boats with any inboard motor restricted from use on the Little Susitna River.

In conclusion, My proposal 238, if approved, would establish a motor size restriction for the Little Susitna River. The LSPUF is a ADF&G facility, and I feel that the Board needs to tell the Department to limit motor size on this fishery. Again, this proposal is not so much about the size of the motor on a boat, as it is about the bank erosion and loss of fish habitat caused by the boats with larger motor sizes.

I submitted proposal 239.

My proposal 239, if approved, **would establish a large king salmon escapement goal for the Little Susitna River.**

This proposal is very similar to proposal 215 from the 2020 BOF meetings, asking the Board to create a Deshka River large King salmon Optimum Escapement Goal (OEG).

My issue is that currently, all king salmon are being counted at the ADF&G operated weir. I would like the Board to adopt a large fish Little Susitna River king salmon spawning escapement goal.
Amend the Little Susitna River king salmon management plan to differentiate between large kings and smaller jacks.

I believe that the Little Susitna River currently has a "jack" problem. The weir technicians could count jacks, but I believe the department does not want them to. I understand counting every Chinook salmon that passes through the weir. I do not agree with this practice, and I feel that it is bad management of the stock. Not counting the jacks could mean missing the escapement goal, which then would lead to more unpopular restrictions.

I just want to see the weir operators differentiate between large and small kings. With a few years worth of data the department can prove or disprove my theory that th Little Susitna River has a jack problem.

I believe that there is a problem of too many smaller (jack) kings returning annually on the Little Susitna River. **Over the past 10 years I have averaged 21 fishing days, 75 hours, and 53 kings caught per year on the Little Susitna River**. These data are based on the arbitrary size that jacks are Chinook salmon that are under 20 inches in length. Nearly all of these smaller jacks are male. The female component of a king salmon run consists almost entirely of older age-class "large" fish.

Of my 532 kings caught in that 10 year period, 224 or 42% were under twenty inches in length, and they are what we commonly call "Jacks". I realize that my sample size is small, but I realistically believe that at least one in three, or 33%, of king salmon returning to the Little Susitna river are undersized jacks! This also implies that only 33% of the counted spawning run are large females.

The weir is in place, and we have the technology to start differentiating between large king salmon and jacks. I do not want ADF&G to count jacks as part of the escapement goal. Even if ADF&G continues to count all kings at the weir they need to start differentiating between larger kings and jacks.

Additionally, I would like to see a change in regulations to address the "jack" issue on the Little Susitna River. Perhaps allow retention of jacks under 20 inches at all times even when fishing or retention is closed by emergency order. But that may be an idea for a separate proposal in 2027?

A similar proposal to my #239 was submitted for the BOF UCI meetings in 2020 except that proposal was for the Deshka River. Unfortunately that proposal was not approved by the Board. I understand that the same technology is used for the weirs on the Little Susitna and Deshka River. If weir operators differentiated between large and smaller kings on both rivers, it would help to determine if there are more jacks on one of the rivers.

As I said earlier, **I believe that the Little Susitna River has a jack problem**, and that ADF&G needs to address this issue.

Several questions come to my mind on this issue:

1. If jacks are viable and they contribute to the spawn, is that what we want?
2. Do eggs fertilized by jacks produce more jacks for future runs.
3. Is there such a thing as too many jacks?
4. What is a "normal" percentage of jacks for king salmon runs in Alaska?
5. **Even if ADF&G continues to count all kings at the weir would it not be better to know how many of those kings were jacks?**
6. Is 20 inches really the measurement that differentiates between two year old fish and three year old fish? I catch a lot of kings on the Little Susitna River between 15-24 inches in length.

During my research for this meeting I observed that **the "Jack" issue has been a frequent topic of discussion at the UCI BOF meetings**. I saw where the Board has adopted the Department's position that Chinook salmon under 20" are considered to be 1-ocean fish. Also that Chinook salmon larger than 20" and under 28" are considered 2-ocean fish.

After completing my research for these comments for this meeting **I have concluded that ADF&G does not want to differentiate between large and small king salmon**. I believe that because king salmon returns have declined over the past several years, the Department personnel feel that they must count every king regardless of size. If jacks are not counted the lower SEG may not be reached, and if that happens then restrictions must be applied through emergency orders.

This is what is written on the Departments web site when you look at fish counts for the Little Susitna River: **"ADF&G operates a weir that is located at river mile 32.5, approximately 4 miles upstream of the public use facility off Point MacKenzie Rd. Escapement is primarily monitored using a resistance board weir. An underwater video system is installed within the weir and motion-detected fish passage is recorded during nighttime hours and at times when the river is heavily glaciated."**

For many years the escapement goal has been between 2,100 and 4,300 king salmon on the Little Susitna River. Currently every king salmon that passes through the weir is counted (when water conditions permit).

ADF&G counts large fish on other fisheries in the State. Recent technology like the underwater video system and motion-detected fish passage for recording during nighttime hours are currently used on the Little Susitna River Weir. Technicians can differentiate between species even when multiple species are in the weir at the same time. **Why would managers not want to use this technology to differentiate between large king salmon and the smaller jacks?** Why would managers not want to count only larger fish?

How Many Fish swim Through the Weir Daily?

Using 2022 Weir data from ADF&G Web site

* 2023 data is missing 8 key days due to high water 22-29 June, when the weir was **Not Fish Tight**!

Kings are easy to count and determine large and small fish:

* By 20 June only 100 Kings through weir
* From 20 June through 7 July 2,000 kings through weir
* **Total kings through weir in 2022 = 2,237**

There are some sockeys going thru the weir early with kings:

* By 20 June 600 sockeye through weir
* By 9 July 1,100 sockeye through weir
* **Total sockeye through weir in 2022 = 1,286**

So by 9 July (51 days) there were a total of 3,111 fish counted at the weir in 2022
This includes a total of **11 other salmon** by then including 0 coho, 8 pink, and 3 chum

Compare that to the end of July and early August when the weir is very busy:

* Over 12 days from 28 July through 8 August a total of 30,868 salmon were counted at the weir
* Including 104 kings, 120 sockeye, 3162 coho, 14,915 pink, and 12,567 chum
* the top day was 30 July when the weir counted **7,377 salmon in one day**
* On average the weir operators counted 2,664 salmon per day at its peak
* **Obviously the weir operators are able to differentiate between species**

Bottom Line, **I think the weir operators can count to a 95% confidence level and differentiate between sockeye, large kings and jacks.**

I now believe that ADF&G does not want to differentiate between large and small king salmon:

1. If my theory is correct, then at least 3**3% of the king run on the Little Susitna River are jacks**.
2. And if the weir operators did **not count the jacks** passing through the weir they would not reach the minimum SEG most years (**would have missed SEG in 2022, 2020, and 2017**).
3. When we add those three years to the missed minimum SEG in 2023 and 2018, then we would have **missed the minimum SEG 5 of the past 7 years.**
4. The Little Susitna River king salmon management plan would then force ADF&G to close the Little Susitna River for king salmon fishing more often (no catch & release).
5. By counting every king that swims through the weir, including jacks, the weir counts show that the minimum SEG has been reached 5 of those 7 years.

6. When you consider the high water and the weir not being fish tight in 2023 and 2018. We do not know how many kings passed the weir those two years. Perhaps the minimum SEG was achieved?
7. **One could argue that king escapement on the Little Susitna River has consistently reached the minimum SEG for the past 11 years** (all the years with weir data after the weir was moved to its current location).
8. So count jacks and reach the minimum SEG, or do not count jacks and not reach the minimum SEG!
9. **What is the best management strategy for sustained yield for the king salmon in this river?**

In conclusion, I fully expect this proposal to be opposed by ADF&G, and that the Board will vote to fail it. I am satisfied to just get the discussion started again on jacks. However I implore the Board to somehow direct ADF&G to **require their weir operators (on the Little Su and Deshka) to differentiate and document the number of large and small kings going through the weir**.

Finally, I am strongly opposed to proposal 242!

Which Prohibits anglers from releasing coho salmon in the Little Susitna River

1. This proposal is nearly the exact same proposal submitted by the same Advisory Group f**or the 2000 BOF UCI meeting**. The BOF did not approve this idea in 2000, and it should not approve this new attempt. I recommend that the Board vote No Action on this proposal, but if it is discussed in the committee sessions, I will state my opinion as well.

2. **I disagree with the proposal's claim that coho are extremely susceptible to catch and release** mortality. Assuming a 69% mortality rate for all coho based on one study is a statistical miscalculation.

3. The proposal refers to a **"1993 ADF&G report on the "Mortality of coho salmon caught and released using sport tackle in the Little Susitna, Alaska-ADF&G** (Doug Vincent-Lang ,Marianna Alexandersdottir and Doug McBride) documented a **69% mortality on coho salmon** in the lower (10 to 15 miles) of fresh water systems when using bait".

4. This 30 year old study is a small sample size with two key variables. First the study took place at the mouth of the river when the fish were "fresh" and have softer mouths. Second the study was done while using bait.

5. In my experience, **there is a huge difference with coho mortality when fishing with bait when compared to using artificial lures**. Current regulations do not allow bait on the Little Susitna River until 6 August. That means that the first three weeks of coho season bait is not permitted.

6. Over the past several years **fishing with bait has often been further restricted by emergency orders (4 of last 7 years)**. Even when bait is not restricted by E/O fishing with bait has been severely restricted due to **high water in mid to late August (3 of last 7 years)**. Over the past 7 years using bait for coho on the Little Susitna River has been a challenge by regulations and water conditions. 2016 was the last year that the fishing for coho in the month of August was not restricted by either regs or water.

7. Over the past 15 years I have caught and released many coho salmon that I am confident did not die that day or that week. Of course every salmon that is caught and released will die eventually! Like most ethical sport fishermen, **I can tell when a fish that I just caught is going to die. When that happens I retain that fish.**

8. The Board of Fish has consistently rejected proposals of this type during earlier meetings. **I strongly encourage the Board to take No Action on this proposal.**

Finally, in conclusion for these remarks to the Board for the 2024 UCI meeting. I recommend that the Board consider and approve my proposals 219, 238, and 239. And that the Board take no action on proposal 242.

Thank you for your time and consideration

Daniel Page,
Eagle River AK
[redacted]

PC167

Submitted by: Kevin Patrick
Community of Residence: Federal Way, WA

To the Upper Cook Inlet Finfish Meeting

I am writing to express my fervent support for hatcheries in Southeast Alaska. Their economic contributions to the region are undeniable, fostering job creation and economic stability. Personally, my experiences with hatcheries have been overwhelmingly positive, amplifying my commitment to their cause. Furthermore, these facilities play a crucial role in environmental conservation, bolstering fish populations and preserving the delicate balance of our ecosystems. I urge thoughtful consideration of the substantial benefits hatcheries bring to both our local economy and the environment.

Best regards,

Kevin Patrick

On

PC168

Submitted by: Zane Pellegrom
Community of Residence: kenai, alaska

I support proposal 128

Proposal 128: Support

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska for almost 24 years and have fished the Kenai River a great deal during that time. Fish habitat, our fisheries and their sustainability are so important to Alaskans.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Juna Penney
Anchorage, AK

PC170

Submitted by: Christopher Perry
Community of Residence: Homer,ak

Commenting on proposals 111,112,113,114,115, 121,122,123,124,125,126,143

Proposal 111: Support	Proposal 112: Oppose	Proposal 113: Support	Proposal 114: Support
Proposal 115: Support	Proposal 121: Support	Proposal 122: Support	Proposal 123: Support
Proposal 124: Support	Proposal 125: Support	Proposal 126: Support	Proposal 143: Oppose

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PC171

Submitted by: Richard Person
Community of Residence: Chugiak alaska

Proposal94 Support As written this proposal would clarify the amount of gear allowed to fish during step-down restrictions in the Chinook plan

Proposal98 Support As written this would provide a very limited fishery for the ESSN if the Kenai late run kings are closed.

Proposals 75,76,77,78 Support The point of these proposals is to remove the OEG for thelate-run Kenai Kings. That OEG was intended to "increase in -river opportunity" but has done the opposite and caused the river to be closed to king fishing.

If the BOF desires to give some limited opportunity to the ESSN there are plenty of proposals to pull from, however here are some points to consider:

-scheduled opening would allow folks to plan supplemental income streams

-June 20- July 1 Historically the early run of KIngs is past most of the Kasilof section and the Late run kings have not shown up yet

-limited fishing means limited crew as an economic reality so large catches are unlikely.

There are many, many other proposals to support or oppose but I will limit my online comments to these.

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Proposal 94: Support Proposal 98: Support With Amendments

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the commercial, sport, and personal use fisheries in Ketchikan, Alaska. Hatchery raised fish are an important and sustainable source of nutrition for our nation. Not only is it a more environmentally sustainable source than much of what you see in the supermarket, but it is the only one under utilized with the potential to really improve the quality of life and health in our nation. Supporting hatcheries is good for Alaska and good for our nation as a whole.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible

resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Greg Phillips
[redacted]
Ketchikan, Alaska

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

Hello, I have been going to Alaska to fish the Kenai River with my friends for the past 10 years. I love fishing the Kenai River so much that 4 years ago my family decided to buy a riverfront property on the middle section of the river. Unfortunately as we all know Commercial Fisherman with gillnets have killed the King Salmon with the genetics of being the largest in the World into almost extinction. That can NOT happen. We MUST STOP GILLNETING at the mouth of the Kenai River and in the river.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

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I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Brent L. Pius

Sincerely,

BRENT PIUS
Shaver Lake, CA

To: Alaska Board of Fisheries February 8, 2024
UCI Meeting February 23 – March 6, 2024

From: Steve Reifenstuhl, representing PNP Statewide Hatchery Group

Re: Opposition to Proposal 43 5 AAC 40.820 Basic Management Plans vis-à-vis Ocean Carrying Capacity

Dear Chair Wood and Board Members:

The BOF is currently considering Proposal 43, which if adopted, would reduce the production of pink salmon in Cook Inlet Aquaculture hatcheries. The proposer has sought to reduce chum and pink production in all Alaska PNP hatcheries for several decades and therefore Proposal 43 is a state-wide issue of critical importance. Several research papers were submitted at the October 2023 BOF Hatchery Committee meeting in Anchorage as a basis for reducing pink salmon hatchery production. Proposal 43 was submitted by Fairbanks AC as were the Ruggerone and McMillan papers which suggest reducing hatchery production with the following logic:

1. Hatchery fish and production have been shown to have negative interactions with wild fish.
2. Pink salmon in the North Pacific are at historically high abundance, and their feeding capacity is disrupting food webs at a basin scale, causing a "trophic cascade" with negative impacts to a wide range of species, including other salmon.
3. Hatchery pink salmon are released in large numbers, and thus are major contributors to the disruption of oceanic food webs.

The effort to reduce hatchery production is reminiscent of a similar proposed action in 2018/2019. In fact, concerns about ocean carrying capacity have been raised for decades. In response to these issues raised in 2018, a detailed alternative view was submitted to the BOF: High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate, by Alex Wertheimer and Willaim Heard (2018).[1] We are resubmitting this paper for your consideration, as its assessment and conclusions are still relevant to proposal 43. Wertheimer & Heard conclusions

[1] Wertheimer A. & Heard W., 2018 High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate, by Alex Wertheimer and Willaim Heard

are that Alaska salmon harvest over the past 25 (now 30) years has been characterized by sustained high production from **wild stocks and large contributions of hatchery fish**. Enhancement has made large net contributions to supplement wild stock harvest in some areas of the state. Density-dependent interactions have been observed at different life history stages of salmon and in nearshore and oceanic habitats during this period but have not constrained the recovery of Alaska salmon from its nadir in the 1970's, or its sustained high abundance in recent years. Rather, density independent responses to climatic factors affecting ocean conditions appear to have largely driven the high and variable productivity of Alaska salmon. Pink salmon have shown the greatest variation in abundance among Alaska salmon, especially in response to anomalous ocean conditions. Thus, rather than restructuring the food webs, they appear to be the most sensitive to changes in marine conditions.

Before addressing the pink salmon carrying capacity issues, we would note that concerns about hatchery and wild fish interactions are also not a new or recently discovered issue. The Alaska hatchery program was established and evolved with a system of policies and practices for managing enhancement in Alaska to minimize negative impacts on the sustainability and optimum production of wild stocks (Gaudet et al 2017).[2] The BOF has been intensively involved in this process. Negative interactions can and do occur, and in order to benefit from the high production potential of large-scale enhancement, strategic and effective policies and management are essential. This is analogous to the necessity to effectively manage commercial, sport, and personal use fisheries. Salmon harvest, both sport and commercial also have genetic, ecological, and demographic impacts on populations of salmon, and therefore also must be managed to minimize negative impacts while optimizing production.

To speak to the attack on pink salmon hatcheries based on papers such as the Ruggerone et al (2023)[3] review, we need some basic understanding of the scale of pink salmon biomass in relation to North Pacific food webs, and how much hatchery pink salmon contribute to this biomass. The correlation leap is quickly made in the Ruggerone and McMillan papers that high abundance of pink salmon somehow equates to hatchery impacts because hundreds of millions of hatchery fish are released into the ocean. First and foremost, **hatchery pink** salmon (all Pacific

[2] Gaudet D., et.al. 2017. Precautionary Management of Alaska Salmon Fisheries Enhancement

[3] Ruggerone et.al. 2023. From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems

Rim countries) make up only **15% on average of the pink salmon in the North Pacific Ocean**; any impacts of pink salmon on oceanic food webs are predominately driven by wild pinks and other salmonids. Second, while pink salmon are typically the most abundant salmon in terms of numbers of adults each year, they make up only 22% of the total wild and hatchery biomass of salmon in the ocean, all countries combined. Chum salmon and sockeye salmon, which have multiple year classes, make up 60% and 18% respectively of oceanic salmon biomass. Third, while there are billions of salmon entering the North Pacific to rear and compete for food resources, there are trillions of other zooplanktovores such as herring, walleye pollack, cod, myctophids, and Japanese pilchards. Salmon have been estimated to make up 4-7% of the biomass of nekton feeding on zooplankton in the North Pacific. Pink salmon would thus compose 1-2% of this biomass, and hatchery pink salmon < 0.5%. The speculation that this small amount of biomass is causing the basin scale effects proposed by Ruggerone et al. (2023) is truly a case of the tail wagging the dog.

While density-dependent interactions, both intra- and interspecific, certainly exist and can be detected in the North Pacific ecosystem, this does not mean that such interactions are controlling abundance and run strength. Trends in populations of salmon and other species identified as impacted by high pink salmon abundance contradict the speculative doomsday hypothesis of basin-scale impacts. For example, sockeye salmon in Bristol Bay are identified as impacted by pink salmon abundance, but Bristol Bay sockeye salmon have been at sustained and record run strengths concurrent with high pink salmon abundance. Similarly, PWS pink salmon have been at sustained high levels of abundance in the past two decades, including the largest wild runs in the historical records. Sitka Sound herring, another population of concern noted by Ruggerone et al. (2023), has increased in spawning biomass simultaneously with high pink salmon abundance and concurrent with large-scale enhancement of chum salmon in Sitka Sound. The Sitka Sound herring stock had the highest spawning biomass ever recorded in 2023. The lack of recovery of PWS herring since the Exxon Valdez oil spill has also been attributed to pink salmon interactions, but current work on humpback whale predation of herring in PWS suggest that

increased numbers of whales are now removing more than 20% of the herring biomass annually, constraining recovery of the herring population (Straley et al. 2018).[4]

Perhaps the two most wildly speculative impacts of the "trophic cascade" hypothesis are the attributions of significant impacts to resident killer whales and humpback whales. Resident killer whales in the Gulf of Alaska have more than doubled in abundance concurrent with the increase and high abundance of pink salmon. The southern Puget Sound resident population of killer whales, cited by Ruggerone et al. (2023) as negatively impacted by pink salmon, is an exception to this trend. However, this population faces a wide array of factors affecting population recovery, ranging from Chinook salmon prey availability, historical disruption of social structure by aquarium captures and removals, as well as exposure to high levels of toxins in their environment. The proposed mechanism of interference of foraging behavior of killer whales by returning adult pink salmon seems highly unlikely, given the increasing numbers of northern resident whales in areas where pink salmon are much more abundant. Note also that the pink salmon interacting with southern resident killer whales are virtually all wild origin; there is no interaction with Alaska hatchery pink salmon.

Similarly, humpback whales have increased dramatically in the North Pacific Ocean since the cessation of commercial whaling for this species. This increase is also synoptic with the increasing abundance of pink salmon, and humpback whales in the eastern Pacific may now have reached or exceeded pre-whaling population sizes (Straley et al. 2018).[5] Humpback whales are known to predate on juvenile salmon, which may provide the whales some foraging opportunities in coastal waters as the salmon migrate into the Gulf of Alaska. Juvenile salmon are not considered an important fish prey component of humpback whales, which is consistent with the relatively low biomass and abundance of juvenile salmon compared to other forage fish species such as herring, sand lance, and walleye pollack. The odd/even year effects Ruggerone et al. (2023) report on calf production for humpback whales is the opposite of the pattern they report for southern killer whales. Using similar logic would indicate some positive response to

[4] Straley et.al. 2018. Seasonal presence and potential influence of humpback whales on wintering Pacific herring populations in the Gulf of Alaska

[5] Straley et.al. 2018. Seasonal presence and potential influence of humpback whales on wintering Pacific herring populations in the Gulf of Alaska

higher abundance of pink salmon juveniles the year prior to calving. Instead, the pattern is made negative by speculating that mating behavior is affected, putting a year lag into the time series.

Pink salmon production and returns to Prince William Sound have been focal points of the discussion on the impacts of enhancement. PWS hatcheries release 600-700 million juveniles annually. As noted above, there have been sustained and even record returns of wild fish from PWS wild stocks as well as very large returns of hatchery fish. From 2010-2019, harvests in Prince William Sound have averaged 50 million pink salmon annually, of which 80% are of hatchery origin. From 1960-1976, prior to the establishment of the enhancement program, harvests averaged 4 million fish annually. Ocean conditions favoring higher productivity of pink salmon are a major factor contributing to the large returns. Several studies have indicated that wild stock production could be higher if hatchery releases were reduced or eliminated. However, such actions would also reduce or eliminate the hatchery returns which could severely impact the fishery and associated local economies.

The paper by Ohlberger et al (2021)[6] is the latest in a series of analysis to examine factors affecting productivity of naturally spawning pink salmon in PWS. They found that the number of hatchery fry released negatively affected wild stock productivity and attributed this to competition of hatchery and wild juveniles in the nearshore environment. Using a similar spawner/recruit model but with different covariates, Wertheimer et al. (2004a)[7] also found an effect of hatchery releases on wild stock productivity, but that most of the variation in productivity could be attributed to annual variations in ocean conditions affecting marine survival. The relatively small yield loss attributed to hatchery fish abundance was associated with smaller size of returning adults at high abundance, which results in reduced fecundity (Wertheimer et al. 2004b). These models can be used to estimate the degree to which hatchery production provides net gains to the PWS fishery. Wertheimer et al. (2004b)[8] estimated a wild-

[6] Ohlberger J., et.al. 2021. Non- stationary and interactive effects of climate and competition on pink salmon productivity
[7] Wertheimer A. et.al. 2004a. Effects of hatchery releases and environmental variation on wild stock productivity: consequences for sea ranching of pink salmon in Prince William Sound, Alaska
[8] Wertheimer A. et.al. 2004b. Does size matter: environmental variability, adult size, and survival of wild and hatchery pink salmon in Prince William Sound, Alaska

stock yield loss of 1 million fish at a time hatchery harvests average 24 million, for a net gain of 23 million fish to the total harvest over the time period 1990-2000.

Ohlberger et al. (2021) estimated that a 50% reduction in hatchery releases would result in a 50% increase in wild productivity. If we use a simple linear application of these percentages to the average annual harvest data for 2010-2019, hatchery harvest would be reduced to 20 million fish annually while wild harvest would be increased to 15 million fish annually. This would result in a total harvest of 35 million fish, a reduction of 15 million fish (30%) of the current average harvest.

Large scale enhancement as designed by the State of Alaska has greatly increased harvest and fishing opportunities for all citizens of the State. The most explicit examples are pink and chum salmon fisheries in PWS, and chum salmon in SEAK, where increased harvests have been compatible with sustained and **record-breaking wild stock production**, while concurrently achieving wild stock escapement goals (Gaudet et al. 2017).[9] The economic benefits of these enhanced fisheries have large multiplier effects on local economies and employment. Large reductions in enhancement operations would seriously disrupt fisheries and associated economic benefits in the affected communities.

While the Ruggerone, McMillan, and Ohlberger papers are worthwhile explorations of salmon abundance and biomass as to how they may impact other species, they are a bridge too far vis-à-vis conclusions regarding humpback whales, Pacific herring, and the negative impacts of hatchery pink salmon. McMillan synthesizes many research papers heavily weighted by Pacific Northwest hatchery programs, programs which were designed to replace what has been lost due to elimination of habitat from dams, encroachment of riparian zones, human population growth, and industrialization. The Ohlberger paper focused on PWS wild and hatchery pink salmon but doesn't make the case that the hatchery pink simply replaces wild pink production. Alaska's enhancement program was designed to supplement harvest opportunities. Current harvest and escapement data proves it does just that.

[9] Gaudet D., et.al. 2017. Precautionary Management of Alaska Salmon Fisheries Enhancement

Thank you for dedicating your time, your attention, and your commitment to securing long-lasting and healthy salmon populations for the citizens of Alaska. We value your pursuit to understand the intricate interplay within our freshwater and oceanic ecosystems.

Our perspective presented here is well grounded in rigorous science and deserving of your consideration in your deliberations on this issue.

Sincerely,

Steve Reifenstuhl, Fisheries Biologist, 45 years' experience, General Manager NSRAA, retired.

Steve Reifenstuhl, Sitka AK

Alex Wertheimer, NOAA Fisheries Research Biologist, retired. Juneau AK

John Burke Ph.D., Pathologist and Regional Supervisor FRED, Deputy Director SF Division, Fisheries Scientist Commissioner's Office, retired, SSRAA General Manager, retired and Senior Science Panel.

Board of Fisheries

October 15-16, 2018
Work Session Anchorage, Alaska

Dear Chairman Jensen and Board of Fish Members:

In the interest of understanding the complex topic of Ocean Carrying Capacity (OCC) this document written by two career fisheries research scientists is presented.

High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

Alex Wertheimer, NOAA Fisheries Research Biologist (retired)[1]
Fishheads Technical Services

William Heard, NOAA Fisheries Research Biologist (retired)[2]

EXECUTIVE SUMMARY

The abundance and biomass of wild and hatchery pink, sockeye, and chum salmon in the North Pacific Ocean has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series. The high biomass has been remarkably consistent from 1990-2015. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance. The high sustained abundance and biomass is driven in no small part by historically high abundance of Alaska salmon, and corresponds with the renaissance of Alaska salmon fisheries from their nadir in the 1970s. Statewide commercial catches of salmon were just 22 million fish in 1973; for 1990-2015, statewide catches have averaged 177 million salmon, an eight-fold increase.

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood; (3) the elimination of high seas drift-net fisheries; (4) production from large-scale hatchery programs designed and managed to supplement natural production; and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean. Habitat, management, and enhancement set and maintain the productive capacity that responds to marine environmental conditions: ocean “carrying capacity”.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms. Ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Over the past few decades, conditions in the North Pacific Ocean have

been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions. Marine conditions vary geographically and temporally within a given year, interannually, and in the context of oceanographic regimes favorable or unfavorable to salmon production.

There are concerns that the high abundance in the North Pacific Ocean, coupled with high variability in stock performances, indicate that carrying capacity is being exceeded, and that competitive interactions are negatively affecting growth and survival. These concerns have been raised for over 20 years. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon).

A proposed mechanism for negative impacts of high abundance of salmon in the ocean is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass. In this scenario, this "trophic cascade" and alteration of food webs then negatively impacts other species, including coho and Chinook salmon. The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. However, assessments of nektonic trophic structure in the Gulf of Alaska and the western North Pacific Ocean indicate that salmon have low to moderate impacts on oceanic food webs, and they respond to, rather than control, changes in ocean productivity.

Pink salmon have been identified as a keystone predator restructuring oceanic food webs to the detriment of other species. Four lines of evidence call this conclusion into question. First, Russian researchers report that in extensive ocean research programs, they have found typically no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop. Second, high numbers of pink salmon in the North Pacific Ocean have been associated with record run sizes and continued sustained biomass of salmon, rather than a reversal in these trends when pink salmon abundance increased. Third, pink salmon have shown the greatest variation in abundance among Alaska salmon, especially in response to anomalous ocean conditions. Thus rather than restructuring the food webs, they appear to be the most sensitive to changes in marine conditions. Finally, the high predation pressure of pink salmon in the context of epipelagic food webs is justified because other species, especially chum and sockeye salmon, switch to other, poorer quality prey items when pink salmon are abundant. However, the obvious implication is that these other species will "switch back" to the prey with higher nutritional value when pink salmon are at lower levels of abundance. Because chum and sockeye salmon comprise almost 80% of the oceanic biomass of salmon, salmon predation pressure on the "high value" prey remains relatively constant.

Effects of pink salmon abundance are often used as a proxy for deleterious effects of large-scale enhancement in general. In fact, while pink salmon are the most numerous of the salmon species in the North Pacific Ocean, wild stocks of pink salmon contribute some 85% of the overall abundance.

Density dependent interactions have been identified within and between species of salmon. These interactions have been observed during both periods of low and high abundance. Changes in size, survival and age at maturity have been attributed to these interactions. Despite the existence of

competitive interactions in the marine environment, high productivity of Alaska salmon has persisted during this period of high abundance. In general, size declines of pink and chum salmon occurred prior to the 1977 regime shift, and thus are associated with poorer ocean conditions rather than ocean abundance of salmon, and sockeye salmon size has been stable over the past 60+ years.

There is also concern that the high ocean abundance of the big three (pink, chum, and sockeye salmon) negatively impact coho and Chinook salmon in Alaska. For coho salmon, size declines in Southeast Alaska have been linked to pink salmon abundance in the Gulf of Alaska, while in Canada recent size increases in coho salmon have been positively associated with the combined biomass of pinks, chums, and sockeye salmon. The high correlation of run strength between coho and pink salmon in Southeast Alaska is strong evidence that their abundance is driven by similar overall response to shared marine conditions. Density-dependent mechanism other than competition may also play a role in pink salmon/coho salmon dynamics. These include such as predator sheltering of coho salmon juveniles by the more abundant pink salmon juveniles (decreasing predation on coho juveniles), predator aggregation (increasing predation on coho juveniles), and direct predation of coho juveniles and adults on pink salmon juveniles.

Chinook salmon stocks in Alaska have been depressed in recent years due to reduced marine survival, and have declined in size at age for older fish, and age at maturity. These changes are not likely driven by the high abundance of salmon in oceanic habitats. Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. Size of Chinook salmon at ocean age 2 has not declined, indicating no density-dependent effect on growth through the first two years at sea. Size declines at older ages are more consistent with selective removal of older, larger fish.

Survival declines of Chinook salmon occurred well into the period of high ocean biomass. There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea. Changes in the North Pacific ecosystem, such as increased killer whale predation, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

Favorable ocean conditions rather than density-dependent interactions seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon, with large releases of hatchery fish putting wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? We conclude the latter, because there is empirical evidence that large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

Introduction

The Alaska Board of Fisheries (BOF) was recently petitioned to hold an emergency meeting asking the BOF to amend actions taken in Permit Alteration Requests (PARs) made by the Prince William Sound (PWS) Regional Planning Team and deny the increase in the number of pink salmon eggs taken in 2018 by 20 million eggs. One of the rationales the petitioners used for rescinding the PAR was "… great concern over the biological impacts associated with continued release of very large numbers of hatchery salmon into the North Pacific Ocean, including the Bering Sea and the Gulf of Alaska." To support this concern, the petitioners provided references to record high abundance and biomass of salmon in the North Pacific, as well as possible density-dependent effects of pink salmon on the trophic structure in the North Pacific Ocean and intra-specific and interspecific competition of pink salmon with other species of salmon and seabirds.

The BOF held the emergency meeting on July 17, 2018, and denied the request for rescinding the PAR. The BOF determined there was no need for such an emergency action, and deferred further consideration to the review of the State's salmon enhancement program scheduled for the October 2018 work session. The intention of that review is for members of the BOF to educate themselves about the program and understand the science the enhancement program is predicated on and the current scientific evaluation.

This paper provides a brief, broad overview of the issue of record abundance and biomass of Pacific salmon and the implications for the status of Alaska salmon. We present this overview in six sections. The first is a review of the recent information on abundance of salmon in the North Pacific. The second is an examination of trends in harvest of Alaska salmon, including enhanced production. The third is a discussion of oceanographic conditions and the concept of "carrying capacity" for salmon in the North Pacific. The fourth is a perspective on the relative role of salmon as a component of the North Pacific ecosystem. The fifth looks at intra- and interspecific competition and density dependence among salmon species, and its possible impacts on growth and abundance. The sixth section summarizes our conclusions from this overview.

I. High Abundance and Biomass of Salmon in the North Pacific Ocean

In a recent paper, Ruggerone and Irvine (2018) published an excellent compendium of the available data on numbers and biomass of pink, chum, and sockeye salmon in the North Pacific Ocean over the time period 1925 through 2015. The authors have compiled diverse data sources of harvest, harvest rates, and escapement. They have used reasonable approaches to estimating total salmon escapements by species by region, and to estimate hatchery and wild origins.

They found that the abundance and biomass of pink, sockeye, and chum salmon has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series, averaging 665 million adult salmon each year (1.32 × million metric tons) during 1990–2015 (Figure 1). During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20%, 35%) and sockeye salmon (13%, 17%). When immature salmon biomass was included in the biomass estimates, biomass was dominated by chum salmon (60% of the combined biomass of all three species),

followed by pink salmon (22%) and sockeye salmon (18%).

The high biomass has been remarkably consistent over the 1990-2015 time period. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance.

Alaska produced approximately 39% of all pink salmon, 22% of chum Salmon, and 69% of sockeye salmon, while Japan and Russia produced most of the remainder. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin. Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Salmon abundance in large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea are dominated by hatchery salmon. During 1990–2015, hatchery salmon represented approximately 40% of the total biomass of adult and immature salmon in the ocean.

In the context of concern for the impacts of hatchery fish on wild salmon and the North Pacific ecosystem, we reiterate three facts about pink salmon noted above. Pink salmon are the most abundant of the species, have the greatest temporal variability in abundance, and are mostly (85%) wild origin (Ruggerone and Irvine 2018). As we will discuss below, the high variability of pink salmon and differences in abundance between odd-year and even-year lines is often used to examine competitive interactions and ecosystem level impacts of salmon in the North Pacific. At the basin-scale, to the extent that such effects may occur, effects of pink salmon are predominately from wild-stock populations rather than from enhanced fish.

II. Trends in Harvest of Alaska Salmon

The high sustained abundance and biomass in the North Pacific Ocean reported by Ruggerone and Irvine (2018) is driven in no small part by historically high abundance of Alaska salmon. It is instructive to put the current levels of salmon harvest into perspective of the 115 year time series of Alaska commercial salmon harvests (Figure 2), to recognize the extent of recovery and extraordinary recent productivity of Alaska salmon. In the early 1970's, Alaska salmon harvests were at their nadir, with statewide catches of all species averaging just 22 million fish in 1973 and 1974 (Figure 2). In the "good old days" of the 1930s, catches sometimes exceeded 100 million. The State of Alaska initiated a number of management actions to address the decline and rebuild production (Clark et al. 2006), with a goal of once again reaching harvests of 100 million salmon. In 1971, the Alaska Legislature established the Division of Fisheries Rehabilitation Enhancement and Development (FRED) within the Alaska Department of Fish and Game (ADF&G) for hatchery development. In 1972, Alaska voters approved an amendment to the state Constitution (Article 8, section 15), providing for an exemption to the "no exclusive right of fishery" clause, enabling limited entry to Alaska's state fisheries and allowing harvest of salmon for broodstock and cost recovery for hatcheries. In 1974, the Alaska Legislature expanded the hatchery program, authorizing private nonprofit (PNP) corporations to operate salmon hatcheries.

Alaska's modern salmon hatchery system started in the 1970s and grew out of depressed fisheries that reached record low harvest levels. At the same time a century old Japanese salmon hatchery system was undergoing dramatic improvements in performance with record high marine survivals of young salmon, increased releases of up to 2 billion juveniles per year, and returns of adult chum salmon ranging from

40 to 60 million fish annually (Kobayashi 1980). These impressive results caught the attention of officials and scientists developing Alaska salmon hatchery program.

Exchanges between Japanese and Alaska scientists, fishermen, and industry helped forge the enhancement strategies and policies in Alaska, resulting in similarities in the two hatchery programs. Similarities include hatcheries operated by private fishermen groups where salmon catches are taxed under a user-pay system to help defray cost of hatchery operations, a focus mostly on pink or chum salmon production, and extensive short-term rearing of pink and chums salmon fry to improve marine survival. However, as reviewed by Heard (2011), there also are significant differences between salmon fisheries, policies, and hatchery operations in the two countries. Commercial salmon fisheries in Japan have been largely dependent on hatcheries while development of hatcheries in Alaska focused on fisheries based on a careful balance between wild and hatchery production (McGee 2004). Some important differences in the two systems include locating Alaska hatcheries on non-anadromous water sources and not on important wild stock river systems, careful selection of brood stocks within a region and restricting use of hatchery brood stocks to specific geographic areas.

Alaska salmon harvests recovered rapidly in the second half of the 1970s, and exceeded 100 million fish by 1980 (Figure 2). With the exception of 1986 (96 million), the statewide catch has been over 100 million salmon annually since 1980. For 1990-2015, harvest has averaged 177 million salmon. After 1980, hatchery production started making up an increasing portion of the harvest. In the last decade (2008-2017), hatchery salmon have composed about 33% of the total commercial harvest, averaging 67 million fish annually (Stopha 2018).

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood (Eggers 1992, Clark et al. 2006); (3) the elimination of high seas drift-net fisheries(Clark et al. 2006); (4) production from large-scale hatchery programs designed and managed to supplement natural production (McGee 2004, Stopha 2018); and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean.

III. **Ocean Conditions and Carrying Capacity**

“*Trying to define ocean carrying capacity is like trying to catch a moonbeam in a jar”. O. Gritsenko, VINRO, Moscow. Member, NPAFC Committee on Scientific Research and Statistics.*

The recovery of Alaska salmon and the record abundances throughout the North Pacific have been repeatedly linked to changes in ocean conditions characterized as the 1977 regime shift. Warming ocean conditions resulted in striking increases in primary and secondary production (Brodeur and Ware 1992). These changes in temperature and lower-trophic level production were associated with profound changes in species composition of fish and crustaceans (Anderson and Piatt 1999). Salmon as a group benefitted (and are an important component of) these ecosystem level changes, with the dramatic increases in abundance observed around the Pacific rim. The importance of the marine ecosystem to the abundance trends is emphasized by the success of large-scale enhancement systems in both Alaska and

Japan concurrent with the high production of wild stocks from Alaska and Russia. Wild stocks are responding to the effects of climate on both freshwater and marine ecosystems, while variation in hatchery returns for a given level of production is driven entirely by the marine conditions encountered.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms (Farley et al. 2018). For salmon in the ocean, feeding and survival conditions are defined by a complex of physical and biological factors, involving both bottom-up (prey) and top-down (predators) processes (Radchenko et al. 2018). These are dynamic processes, resulting in annual variability in salmon production in the marine environment. The ocean conditions driving these processes vary over both short and long time periods, so that annual variability occurs in the context of "regimes" that can be favorable or unfavorable to salmon (Beamish et al. 1999,2004; Shuntov et al. 2017; Radchenko 2018).

Over the past few decades, "carrying capacity" conditions in the North Pacific Ocean have been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, responses of stocks of Pacific salmon have not been uniform during this period, and extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions, and not a result of a homogeneous ocean carrying capacity (Heard and Wertheimer 2012).

Marine survival of Pacific salmon is more correlated between neighboring populations than with more distant ones (Mueter et al. 2005; Pyper et al. 2005; Sharma 2013), emphasizing the importance of local and regional conditions. The first few months at sea is the period of highest mortality per day for juvenile salmon in the marine environment (Heard 1991; Quinn 2005; Farley et al. 2007, 2018). Variability in mortality during this period can be large, and can be the major driver of year-class strength. An extreme example is the returns of Fraser River sockeye salmon in 2009 and 2010. In 2009, only 1.5 million fish returned, the lowest return since 1947; in 2010, 29 million fish returned, the highest number since 1913. Conditions during the early marine period are considered the primary factor affecting these changes in survival of Fraser River sockeye salmon (Beamish et al. 2012).

Salmon surviving the early marine period are exposed to continued mortality, albeit at a lower rate (Quinn 2005). The first winter at sea has been posited as a critical time period for determining year class strength (Beamish et al. 2004; Moss 2005). Older immature and maturing salmon have much lower mortality rates (Ricker 1976), but these extend over a longer period of time, from 1 year for pink salmon to 5 years for Chinook salmon. Forecasting approaches using juvenile salmon abundance index to predict returns (Wertheimer et al 2017; Murphy et al. 2017) assume that recruitment through the early marine stage has established year-class strength, and that subsequent mortality does not vary substantially from year-to-year. However, Radchenko (2018) reports that cumulative ocean mortality can vary 1.5-2 times. These ocean effects on survival can result in large deviations, positive and negative, from forecasts from juvenile salmon indexes (Figure 3). For 2006, the forecast for Southeast Alaska pink salmon harvest was 35 million fish; the actual harvest was 11 million fish, less than one third of the forecast. In contrast, the pink salmon forecast for 2013 was 53.8 M fish, but the forecast was 43% lower than the actual harvest of 94.7 million fish, the largest harvest since catch records were recorded dating back to 1900 (Figure 3, Figure 4).

These results illustrate that variations in marine survival between different local or regional areas occur in the context of larger basin-scale climatic influences on overall production levels of pink and chum salmon in the GOA. Prevailing basin-scale conditions likely strongly influence environmental factors that favor a higher or lower range or level of potential survival for juvenile salmon from different regions.

The "carrying capacity" encountered by a salmon population is a cumulative effect encompassing different life-history phases. The conditions encountered by the salmon will depend on their geographic origin and their ocean migration patterns, which differ by species and stocks. The ocean is a dynamic environment, with substantial variability throughout the North Pacific basin. In 2013, "carrying capacity" for pink salmon in the Gulf of Alaska (GOA) was high, with strong returns throughout the GOA. Returns in both Southeast Alaska and PWS were at record levels. In contrast, in 2015 pink salmon again returned to PWS in record numbers, while returns in Southeast Alaska were below the 1995-2015 average and below forecasts from juvenile salmon indexes, demonstrative of the regional nature of the response of pink salmon stocks to ocean conditions (nearshore and oceanic).

While the general warming in the North Pacific Ocean has been a feature of the high productivity for salmon (Brodeur and Ware 1992; Mantua et al. 1997; Farley et al. 2018), ocean warming events associated with climate change are occurring with more frequency, often with detrimental impacts on salmon (McKinnell 2017). Recent ocean warming events are associated with the decline of the even-year pink salmon in Southeast Alaska. From 1960 through 2005, there was no clear dominance of even or odd year lines of pink salmon in Southeast Alaska (Figure 4). In the summer of 2005, juvenile pink salmon from SEAK encountered anomalous warm conditions in the Gulf of Alaska (Figure 5). These ocean conditions were associated with the occurrence of neretic fish and invertebrates characteristic of more southern locales, including Humboldt squid, blue shark, Pacific sardine, and pomfret (Wing 2006). The resultant 2006 return was, as noted above, only one-third of forecast, and the lowest since 1988. Even year pink salmon appeared to be recovering relative to the 2006 return, attaining a harvest of 37 million in 2014.

In the winter of 2014/2015, another marine heatwave, aka the warm blob, reached the eastern GOA (DiLrenzo and Mantua 2016). The 2014-brood pink salmon that entered the GOA in 2015 again had poorer than expected survival, attaining only half of the forecast in 2016 (Figure 3). Poor pink salmon returns occurred throughout the Gulf of Alaska in 2016, resulting in a Federal disaster declaration for the fishery. The broad nature of the pink salmon run failure is indicative of shared ocean effects. However, regional and local variability were also apparent. In Southeast Alaska, harvests of pink salmon in the northern area were 20% of the recent 10-year average, whereas in the southern area harvest was 80% of the recent 10-year average. In PWS, much of the catch was supported by fish from Solomon Gulch Hatchery, which was still 50% below forecasts based on average marine survivals. Marine survivals were poorer yet for pink salmon from Prince William Sound Aquaculture Association hatcheries, where returns were less than 20% of forecast (Russell et al. 2017).

The 2005 and 2015 ocean heat waves thus had a broad-scale impact on the carrying capacity for pink salmon in the Gulf of Alaska, with 2015 having a more pervasive impact among regions. Both wild and hatchery fish were affected; the return to SEAK is predominately (> 95%) wild, and the hatchery return

to PWS was the lowest since 1993.

It is noteworthy that despite the poor returns of pink salmon, generally the most abundant species in the Alaska harvest, statewide harvest in 2016 was still above 100 million salmon (Figure 2). Variability in abundance numbers throughout the North Pacific reflects high variability in pink salmon, which appear to be the most sensitive salmon species to annual changes in ocean conditions because of their lack of multiple year-classes at sea.

Ruggerone and Irvine (2018) raised the concern that the high abundance of salmon coupled with variability in stock performances indicates that carrying capacity of the North Pacific Ocean for salmon has been reached or exceeded. This is not the first time such concerns have been raised. Various authors over the past 20 years have posited that high abundance of pink, sockeye, and hatchery chum salmon may have exceeded carrying capacity and be negatively affecting or constraining salmon production (e.g., Peterman et al. 1998; Ruggerone et al. 2003; Davis (2003); Sinyakov (2005, cited in Shuntov et al. 2017). In spite of these concerns, abundance and biomass have continued to be high, reaching record levels in recent years (Figure 1).

As Shuntov et al. (2017) noted, ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon). The sky has not yet fallen. This is not to say that the high abundance will persist indefinitely. The shock of the marine heat waves of 2004/2005 and 2014/2015 to Alaska pink salmon demonstrates that carrying capacity can vary within a productive regime, and reminds us that the status of the current production regime is vulnerable to both gradual and abrupt changes driven by a warming climate. Continued warming could result in contraction of the range of Pacific salmon in the North Pacific Ocean (Welch et al. 1998).

IV. Trophic Position of Salmon in the North Pacific Ecosystem

A major concern over the high abundance of salmon is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass (Ruggerone and Irvine 2018; Batten et al., in press). This “trophic cascade” and alteration of the food web has been linked to decline in size and abundance of Alaska Chinook salmon and coho salmon (Ruggerone and Irvine 2018; Shaul and Geiger 2016); growth and diet of salmon (Davis 2003); and declines in seabird nesting success and survival (Springer and Van Vielt 2014; Springer et al. 2018).

Dominance of oceanic food webs by salmon is not consistent with the abundance and biomass of salmon relative to other components of the North Pacific ecosystem, including competitors and prey fields. In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Biomass of salmon subsequently increased to the current levels of 4-5 million t, representing 4-8% of total nektonic biomass during the current period of high abundance. During this period, the biomass of

the two most abundant fish species within their ranges in the North Pacific, walleye pollock (*Theragra chalcogramma*) and Japanese pilchard (*Sardinops melanostictus*), reached 50 million t each.

In the epipelagic layer, Shuntov et al. (2017) estimated that the mean annual food consumption (plankton and small nekton) by the nektonic fauna varied within 210.4–327.3 million t; in the 0–1000 m layer it ranged from 389.0 to 516.0 million t. The amount of food consumed by salmon was 4–8 million t. The proportion of total nekton ration consumed by salmon in the epipelagic layer was 1% - 15%, depending on oceanic area (Figure 6).

This view of low to moderate impact on epipelagic food webs is consistent with mass-balance modeling of North Pacific ecosystems by Pauley et al. (1996). Pacific salmon and steelhead were estimated to make up 4.6% of the epipelagic fish biomass in the Alaska gyre. If squid are including as competitive nekton for zooplankton production, Pacific salmon made up 3.4% of the nektonic biomass. Estimated salmon biomass was < 1% of the estimated zooplankton biomass.

Similarly, the impacts of juvenile salmon feeding during early marine residency on zooplankton has been found to be relatively low. As noted above, the early marine residency is a period of high and variable mortality which may determine year class strength. Given more limited areal habitat than the coastal zone and ocean basin, this period may represent a potential bottleneck for survival. Orsi et al. (2004) used a bioenergetics model to examine consumption of zooplankton by hatchery and wild chum salmon in Icy Strait, Southeast Alaska. They found that juvenile chum salmon consumed only 0.05% of the zooplankton/km2 in the upper 20-m of the water column, and 0.005% for the integrated water column to 200 m in June and July in 2001. Because juvenile salmon are typically in the upper water column, total standing crop of zooplankton is not likely to be available as forage on a daily basis, but does represent a source for zooplankton abundance in the surface layer through vertical diel migrations. The percentage of available prey consumed by juvenile salmon in the neritic habitat of Icy Strait was less than 0.05% of the available standing stock. Low consumption estimates were also estimated by several other studies. Karpenko (2002) reported that juvenile chum salmon consumed between 0.1 and 1.1% of the total stock of zooplankton in the upper 10 m of Karaginskii Bay, Kamchatka from June to August over a 5-year period. Cooney (1993) estimated juvenile salmon in PWS consumed 0.8–3.2% of the total herbivore production and 3.0–10.0% of the macrozooplankton production. Boldt and Haldorson (2002) reported that juvenile pink salmon near PWS could consume 15–19% of preferred prey taxa such as large calanoid copepods and amphipods if the available standing crop was fixed over a 10-day period; however, on a daily basis, consumption of no taxon exceeded 2% of the standing stock.

Pink salmon have been identified by some authors as the salmon species most affecting oceanic food webs (Ruggerone and Irvine 2018). Surface layer zooplankton indexes have been associated with differences in abundances of odd- and even-year pink salmon stocks (Batten et al. in press). However, there was no directed fish sampling or monitoring of zooplankton below the surface layer (7.5 m) in Batten et al.'s study. Radchenko et al. (2018) reviews studies showing that "as a rule, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop."

A conceptual problem to assigning plankton depletion to pink salmon feeding is prey-switching by salmon species. Pink, chum, and sockeye salmon have substantial overlap in their diets, and the latter two species have been shown to switch to other, "lower-quality" prey when pink salmon are abundant

(e.g., Davis 2003). These changes in feeding habit are often used to support the concept of density-dependent interactions with pink salmon and their congeners, e.g., Ruggerone and Connors (2015). However, if other species switch prey in response to high pink salmon abundance, they certainly would switch back to the "higher value" prey when pinks are not as abundant. Chum and sockeye salmon make up on average 78% of the biomass of these three species. As a result, there is more of a constant prey demand among this feeding guild in spite of the high variability in pink salmon abundance in the North Pacific. Rather than shaping the ocean food web, pink salmon appear to be most sensitive to interannual changes in oceanic conditions, resulting in high variability in their numbers, both temporally and geographically.

Competition among species may also be minimized by the distribution of salmon in oceanic habitats. Unlike the schooling behavior characteristic of juvenile salmon and maturing salmon in nearshore and coastal areas, salmon at sea are widely dispersed (Shuntov 2017). This behavior reduces competitive interactions and makes their feeding, growth, and survival in the ocean more density-independent.

The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. Four to five million tons of biomass is not a trivial amount. Of this 40% is hatchery origin, primarily chum salmon. Approximately 5 billion hatchery juveniles are released into the North Pacific annually (Figure 7). However, the North Pacific Ocean is a large marine ecosystem, and the numbers are not overwhelming when put into context of total nekton and forage bases. Not all nektonic prey is available to salmon due to depth distribution; Ayedin (2000) concluded local depletion of prey by salmon can occur as salmon school density increases, even if prey is not depleted over large ocean areas. This is an important point in understanding regional differences in changes in size at return.

The sustained high marine abundances of both natural- and hatchery-origin salmon over the past 25 years indicates that the trophic structure has not been altered in some way that inhibits salmon productivity. We agree with the conclusion of Shuntov et al. (2017): "… the role of salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species."

V. Competition and density dependence versus density independent responses

An intuitive concern with the high abundance of salmon in the context of ocean carrying capacity is that density-dependent competition for limited prey resources may affect growth and survival of salmon populations. Pink, chum, and sockeye salmon have substantial overlap in their diets (Davis 2003, Brodeur et al. 2007) and the latter two species have been shown to switch to other, "lower-quality" prey when pink salmon are abundant (e.g., Davis 2003). High abundance of pink salmon in the Gulf Alaska has been associated with growth and size at return of chum salmon, sockeye salmon, coho salmon, Chinook salmon, and pink salmon themselves (e.g., Agler et al. 2011; Jeffrey et al. 2017; Ruggerone et al. 2003, 2018: Shaul and Geiger 2017; Wertheimer et al. 2004a). Reduced growth can result in lower size-at-age, shifts in age at maturity for species spending multiple years at sea, and reduced fecundity, which can affect productivity of salmon populations. Ruggerone et al. (2003) ascribed large reductions

in marine survival of Bristol Bay sockeye salmon to the impact of Asian pink salmon on the sockeye salmon growth at sea. The concern for density-dependent competition is not new; Peterman (1984) found evidence of density-dependent interactions between Fraser River and Bristol Bay sockeye salmon. This was at a time when salmon abundance had not expanded to current levels and when hatchery fish made up a low proportion of the abundance and biomass. As salmon abundance and biomass increases, Aydin (2000) concluded that density-dependent interactions could result in negative feedback loops on prey availability in the ocean ecosystem.

Despite the existence of competitive interactions in the marine environment, high abundance and biomass have not resulted in consistent negative trends in salmon size or productivity. Ruggerone et al. (2018) reported that average size has declined for chum salmon and pink salmon since 1925, but not for sockeye salmon (Figure 8). Most of the size decline for pink and chum salmon occurred prior to 1977, which would suggest that pre-1977 regime change conditions were more important than density dependent interactions. Size of pink salmon and sockeye salmon remained stable during the recent period of high abundance, while chum salmon showed some continued decline. Jeffrey et al. (2017) reported similar results for average sizes of British Columbia pink, chum, and sockeye salmon since 1951. Pink salmon declined initially in size, and then have remained relatively stable since the 1990s at a size that is 20-30% less than in the 1950s and 1960s. There was little change over the time series in the average size of sockeye salmon. Regional differences have certainly been observed. For example, Wertheimer et al. (2004) found evidence of size declines in PWS pink salmon in relation to pink salmon abundance in the GOA, while. Shaul and Geiger (2017) reported that pink salmon size has increased in Southeast Alaska in recent years.

Helle et al. (2007) found that body-size of pink, chum, and sockeye salmon from Alaska to Oregon generally declined in after the 1977 regime shift as salmon abundance increased, until 1994. After 1994, body size of these species generally increased, during a period when biomass and abundance was at sustained high levels. They attributed the initial decline to density-dependent competition, and the lack of relationship of abundance to size in the latter period as an outcome of favorable ocean conditions. They concluded that the carrying capacity of the North Pacific Ocean for producing Pacific salmon is not a constant value and varies with changing environmental and biological factors.

In their study on size of British Columbia salmon, Jeffrey et al. (2017) examined the relationship of size trends to estimates of salmon biomass in the North Pacific Ocean. They found that the biomass of North American pink salmon entering the Gulf of Alaska was the most important biomass variable in explaining size variation in BC pink salmon. The direction of the effect was negative, suggesting intraspecific competition was affecting size. For chum salmon, combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation. The direction of the effect was negative, suggesting some degree of competition among these congeners. Biomass of North American chum salmon was the most important biomass variable explaining size variation in sockeye salmon. Adding Asian chum salmon to this (or combined measures of biomass) did not improve the fit. The direction of the effect was positive, indicating that when chums are abundant, growth conditions for sockeye are positive.

These associations (and lack of associations) between ocean abundance and size at return of Alaska and British Columbia salmon indicate that while competition can affect size and growth, density-

independent ocean conditions drive the variability in abundance and can override the impacts of density-dependent competition. We reiterate the findings of Radchenko et al. (2018) that generally, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop.

Reduced survival and productivity of wild stocks in Alaska have been attributed to competitive interactions with Asian pink salmon (Bristol Bay sockeye salmon; Ruggerone et al. 2003) and hatchery pink salmon (PWS pink salmon; Hilborn and Eggers 2001). Alternate analyses and recent trends have refuted these conclusions. In Bristol Bay sockeye salmon, Ruggerone et al. (2003) estimated reduced survivals of even-year sockeye salmon smolts from Bristol Bay at 23-45% less than odd-year smolts for the 1977 to 1997 smolt years. Even-year smolts enter the ocean when odd-year pink salmon are on average more abundant. They concluded that competitive interactions with Russian pink salmon reduced growth of even-year smolts, and resulted in substantially lower average smolt survival. However, the abundance of Russian pink salmon was highly variable over the time period for both odd and even year lines. When pink salmon abundance was considered in a time series analysis of the survival data, rather than using odd/even year average survival, there was no discernable effect of pink salmon abundance on survival (Wertheimer and Farley 2012). Subsequent to the 1997 smolt year, both Asian pink salmon and Bristol Bay sockeye salmon increased in abundance, and a marine survival index for Bristol Bay sockeye salmon smolts was positively associated with abundance (Farley et al. 2018.) Thus increasing biomass of Asian pink salmon has not constrained the continued high productivity of Bristol Bay sockeye salmon.

In PWS, Hilborn and Eggers (2000) concluded that hatchery production provided no net benefit in terms of pink salmon harvest, but was simply replacing wild production through density-dependent interactions. However, Wertheimer et al. (2004a, 2004b) showed that a density-independent index of marine survival explained much of the variability in wild pink salmon productivity, and that there was a large net benefit from enhancement to the PWS pink salmon harvest, albeit with some reduction in wild stock production attributed to the effects of size at return on fecundity. Amorosa et al. (2017) also showed large net gains from hatchery production, albeit lower than would be expected from the authors own argument for proportionate increases in wild pink salmon production following the 1977 regime shift. They minimize the contribution of hatchery fish in PWS by focusing on changes in the common property fishery, dismissing the annual cost-recovery harvest of an average of eight million pink salmon in their evaluation of benefits. The cost-recovery harvest is important to the fisheries economy of PWS, and an important benefit of the enhancement program (Pinkerton 1994). The recent analysis of productivity of PWS pink salmon for the re-certification of sustainability of PWS pink salmon showed continued sustained production of wild stocks during the hatchery era (Figure 9; Gaudet et al. 2017). The historical record returns of wild pink salmon in 2013 and then again in 2015 are particularly demonstrative that wild stocks in PWS retain their high production capacity after 40 years of hatchery enhancement.

Our discussion thus far has focused primarily on the abundance trends of pink, chum, and sockeye salmon, which combined make up most of the biomass of salmon in the North Pacific Ocean. Besides interactions among these species, there is concern that their high overall abundance is negatively impacting coho and Chinook salmon (Ruggerone et al. 2018).

The commercial harvest of coho salmon averaged 1.5 million fish from 1970-1977, then increased rapidly following the 1977 regime shift, peaking at over 9 million in 1994. From 1995 until 2017 the harvest has ranged from 3 to over 6 million fish annually, averaging 4.5 million, with no apparent trend during this period (Figure 10). Approximately 22% of the commercial harvest during the latter period has been produced from Alaska hatcheries. Recreational harvest has increased in recent years, and averaged 1.2 million fish from 2007-2017 (M. Stopha, ADF&G, personal communication).

Mallick et al. (2008) examined marine survival of 14 stocks of coho salmon in Southeast Alaska. They found evidence of effects on marine survival at local, regional, and basin scales. There was high covariation in survival regionally, and no trend was noted over the recent time period. Abundance of juvenile hatchery releases in the year coho smolts went to sea was identified as affecting marine survival, but the effect could be positive or negative, depending on stock. This result exemplifies the complex competitor/predator interactions that have been posited for coho and pink salmon. Negative impacts of large hatchery releases could indicate competition for prey resources or aggregation of prey (Beamish et al. 2018). Positive influences could be a result of "predator sheltering," where the abundant hatchery juveniles act as a buffer on predation on the less abundant, larger coho smolts (Holtby et al. 1990; Briscoe 2004; LaCroix 2009). Abundant hatchery fry and juveniles could also provide an important forage base for coho salmon. Coho salmon juveniles are a major predator of juvenile pink salmon in nearshore marine areas (Parker 1971, Hargreaves and LeBrasseur 1985) and as adults when returning to coastal areas as the juvenile pink salmon emigrate towards the ocean (Sturdevant et al. 2012).

Shaul and Geiger (2017) showed a negative trend in marine survival in recent years for Berners River coho salmon which they related to ocean biomass of North American pink salmon. They attribute the negative impact to predation of pink salmon on squids that are the major prey for coho salmon in offshore areas. They propose that pink salmon are keystone predators of squid, exerting top-down control and thus directing the energy flow in the system. In contrast, Aydin (2000) concluded that the squid, with its high biomass and productivity, was controlling energy flow to salmon. Aydin (2000) found that squid abundance, while highly variable, had increased greatly (as did salmon) after the 1977/1978 regime shift. That squid abundance increased commensurate with salmon abundance indicates the species were responding similarly to the increased productivity in the North Pacific (Brodeur and Ware 1992). Aydin (2000) also found differences in odd and even year distributions of squid in the North Pacific, which could contribute to the odd/even differences in coho salmon size observed by Shaul and Geiger (2017).

If pink salmon impacts on squid were driving marine survival for coho salmon, we would also expect decreasing trends in abundance and marine survival for coho salmon over the 1995-2015 time period of high pink salmon abundance. Instead, catch has been stable, and marine survival declines, at least in southeast Alaska, are a recent phenomenon. Commercial harvest data for coho salmon and pink salmon show very strong correlation annually (LaCroix et al. 2009). If density-dependent interactions were primary, we would expect negative correlation. The correlation is actually strongly positive; from 1960 – 2017, it had an r value of 0.82 ($P < 0.001$; Figure 10). Because returning adult coho and pink salmon have roughly the same period of time in the marine environment, this indicates that shared ocean conditions are driving their year-class strength.

Size trends in coho salmon have varied regionally, with very different relationships to ocean salmon biomass. Shaul and Geiger (2017) found that size at harvest of coho salmon in southeast Alaska increased from 1970 until 1984, then declined from 1985 to 2015. They associated the decline with an index of the biomass of North American pink salmon. Their model did not indicate direct competition, but rather lagged effects at 2- and 4- years affecting the population dynamics of the squid (*Berryteuthis anonychus*). The lag response model requires that the squid have an obligate two-year life-history cycle as proposed by Jorgensen (2011). This is contradicted by other literature, which characterizes *B. anonychus* as an annual species with high productivity (Katugin et al. 2005, Drobney et al. 2008). Aydin (2000) cites studies showing that *B. anonychus* is highly productive, and spawns twice a year.

Regardless of mechanism, coho salmon size has declined in Southeast Alaska. In contrast, coho salmon body size has increased in British Columbia in recent years. Jeffrey et al. (2017) showed coho body weight declined from the 1950s, and did not reach its minimum until around 1985. Since then it has increased and is now at the highest level in the data series. The combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation in coho salmon, and had a positive effect on size. The authors speculate that the positive relationship may be driven by environmental conditions, which when favorable allow for greater total biomass of salmon species and higher growth (thus larger size) in coho salmon. Shaul and Geiger (2017) and Jeffrey et al. (2017) both use basin-scale measures of environmental conditions in their models exploring factors affecting coho salmon size. The contrasting results for Southeast Alaska and British Columbia are indicative of the variability in response of different populations to these conditions. This may be caused by different migration patterns in the ocean environment, or different local and regional responses of availability of salmon forage to basin-scale environmental factors.

The recent disastrous returns of Chinook salmon in Alaska has precipitated considerable focus on the least abundant but (on a fish by fish basis) most highly valued salmon species (ADF&G 2013). Chinook salmon have a highly varied and diverse life history, generally more complex than other Pacific salmon exemplified by numerous variations in run and spawn timing, freshwater biology, ocean distribution and behavior patterns, diet, slower ocean growth, and older age at maturity (Healey 1991). In the eastern North Pacific most juvenile Chinook salmon from Oregon to Southeast Alaska remained within 100-200km of their natal rivers until their second year at sea, regardless of their freshwater history (sub-yearling or yearling) and spring, summer, or fall adult run timing (Trudel et al. 2009). Healey (1983) reported that most fall type Chinook salmon tend to remain continental shelf and slope oriented during much of their ocean life history whereas many spring type fish spend much of their ocean life in more offshore waters. In recent years, based on coded-wire tag recoveries, it was found that many Alaska spring-type Chinook salmon also utilize slope and continental shelf waters as immature adults. Coded - wire tagged Chinook salmon from Southeast Alaska (SEAK) and Cook Inlet frequently are recovered in Bering Sea Aleutian Island and Gulf of Alaska trawl fisheries for Walleye Pollock (Meyers et al. 2001; Celewycz et al. 2006).

Marine habitats of Chinook salmon related to depth distribution and migration patterns are diverse and often distinct from most other Pacific salmon. Juvenile Chinook salmon distribute deeper than coho and other juvenile salmon in their first summer and fall at sea (Orsi and Wertheimer 1995; Beamish 2011). Immature Chinook salmon are associated with colder temperatures and deeper depths than other salmon species (Walker et al. 2007; Walker and Myers 2009; Riddell et al. 2018). Diel vertical migrations have

been documented in a number of data storage telemetry studies, with movement to greater depths during daylight hours (Radchenko and Glebov 1998; Murphy and Heard 2001; Walker et al. 2007). One Chinook salmon tagged in the Bering sea typically was between the surface and 100 m depth, but occasionally moved to depths in excess of 350 m (Walker and Meyers 2009).

Marine diets of Chinook salmon are distinctly different than diets of pink, chum, and sockeye salmon and more similar to coho salmon (Brodeur et al. 2007; Riddell et al. 2018). Juvenile (first-ocean year) Chinook salmon in coastal waters initially have highly varied diets composed of fish, zooplankton, and insects, then become predominately piscivorous in costal habitats (Brodeur et al. 2007). Fish made up from 65% to 99% of stomach contents by weight for juvenile (ocean- age 0) Chinook salmon sampled within the inside and outer coastal waters of SEAK (Landingham et al. 1998: Weitkamp and Sturdevant 2008). Fish were also the primary prey for immature (mostly ocean-age 1) fish in SEAK (Cook and Sturdevant 2013), coastal British Columbia (Herz et al. 2017), and northern and southern Bering Sea (Farley et al. 2009). Primary prey species included capelin, sand lance, lanternfish, and Pacific herring. In more offshore habitats, Chinook salmon consume primarily fish and squid, although euphasids can make up a substantial portion of their diet (Davis 2003; Shuntov et al. 2010; Karpenko et al. 2013). Herring and sandlance dominate the diets of older immature and maturing Chinook salmon (ocean-ages 2+) in coastal waters (Reid 1961; ATA 2016), with sandlance the dominant prey in outside waters of southeast Alaska and herring the dominate prey in inside waters (ATA 2016).

Run sizes increased across AK after the 1977 regime shift, and were variable but consistently above average until a precipitous decline starting in 2006 (Figure 11). This decline was consistent with reduced marine survival of southeast Alaska stocks after the 2000 and 2001 brood years (ADF&G 2013; Ohlberger et al. 2016; CTC 2018). Thus the decline began well after the current period of high biomass of salmon in the ocean started (Figure 1), and well after hatchery releases into the North Pacific peaked and stabilized at 5 billion per year in 1988 (Figure 7).

Size at maturity and age at maturation has declined over the last three decades for Alaska Chinook salmon stocks from southern Southeast Alaska to the Yukon River (Lewis et al. 2017). The size declines are coincident with high abundances and biomass of the Big Three (pink, chum, and sockeye salmon). Could competitive interactions with the Big Three be driving the decline? There are several lines of evidence that indicate this is not the case.

First, the differences in marine ecology we noted in the preceding paragraphs suggest that Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. These differences are exemplified by the growth differences of Chinook salmon and coho salmon in their first winter at sea. Although approximately the same size in the fall, by the following year coho salmon of the same ocean cohort are over three times larger than Chinook salmon (Riddell et al. 2018).

Second, while Lewis et al. (2017) found predominately declining size for older (ocean age 3 and 4) Chinook salmon, size of ocean age 2 fish has generally not changed over the time period (Figure 12). If competition was driving the size decline, competition should be most intense for the younger age Chinook salmon, which have a more extensive overlap in size and type of prey with other salmon. Also, lower ocean growth in Pacific salmon is typically associated with shifts in age distribution towards older

ages (Hard et al. 2008), but instead average age at maturity has declined. Thus there has not been an apparent decline in growth of 1-ocean and 2-ocean age Chinook salmon during the "high abundance" period.

Third, British Columbia Chinook salmon have been increasing in average size over this time period (Jeffrey et al. 2017). These authors found a positive relationship between biomass of North American salmon and British Columbia Chinook salmon average size, indicating that size was a function of the same favorable ocean conditions sustaining the record overall biomass.

Size declines of Chinook salmon are not new in Alaska waters; Ricker (1981) found a significant decrease in size of Chinook salmon harvested in the SEAK troll fisheries from 1960 to 1974, and identified selective fishing for older, larger fish as a factor in the decline. Research by Hard et al. (2009) and others indicate selective harvesting of large older age groups of Chinook salmon can introduce reductions in fitness and cause genetic drift in growth, size, and age of maturity due to the heritability of these characteristics. However, fishing alone does not explain the decline across the geographic range of Alaska Chinook salmon, because the degree to which populations are exposed to directed selective fishing varies considerably across the range. It also does not explain the sudden decline in marine survival, as fishing pressure and exploitation rates in the ocean have not increased (CTC 2018b).

Another large predator besides humans also target larger, older Chinook salmon. Resident killer whales have been found to preferentially feed on larger Chinook salmon (Olesiuk et al. 1990; Hanson et al. 2010). In northern British Columbia and southern Alaska waters killer whales have increased at annual rates of 2.9% and 3.5%, respectively (Hilborn et al. 2012; Matkin et al.2014), more than doubling their abundance since the 1970s. Intense predation on larger fish, coupled with lower marine survival, could contribute to the changes at size at age and age at maturity of Alaska Chinook salmon.

There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea (e.g., Greene et al. 2005: Duffy and Beuchamp 2011; Sharma et al. 2013; Murphy et al. 2017). Local conditions encountered by juvenile Chinook salmon during early marine residency thus play an important role in determining year-class strength. However, the concordant trends in survival across such a broad geographic range indicate that large-scale processes are affecting stocks across regions. Increasing populations of pinnipeds could also be affecting early marine survival. Chasco et al. (2017) estimated predation on juvenile Chinook salmon by pinnipeds in Puget Sound had increased an order of magnitude from 1970 to 2015, and was now, expressed as adult equivalences, more than six times greater than the combined commercial and recreational catches in Puget Sound.

For Pacific salmon species that spend multiple years at sea, annual marine survival generally increases with size and age (Ricker 1976). For cohort reconstruction of Pacific northwest and SEAK Chinook salmon, natural mortality is assumed not to vary interannually and to decrease with ocean age, from 40% for ocean-age 1, 30% for ocean-age 2, 20% for ocean-age 3, and 10% for ocean-age 5 or older (Sharma et al. 2013; CTC 2018b). These assumptions are simplistic and undoubtedly not always correct, but there is little information to better inform the assumptions. Changes in the North Pacific ecosystem, such as increased killer whale populations, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

VI. **Conclusions**

In spite of concerns over exceeding the carrying capacity of the ocean, Alaska salmon have been at unprecedented levels of abundance over the past 25 years. Conditions influencing survival in the ocean, rather than density-dependent interactions, seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. The Alaska salmon harvest over the past 25 years has been characterized by sustained high production from wild stocks and large contributions of hatchery fish. Enhancement has made large net contributions to supplement wild stock harvest in some areas of the state. Density-dependent interactions have been observed at different life history stages of salmon and in nearshore and oceanic habitats during this period, but have not constrained the recovery of Alaska salmon from its nadir in the 1970's, or it sustained high abundance. Rather, density independent responses to climatic factors affecting ocean conditions appear to have largely driven the high and variable productivity of Alaska salmon.

Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon? Would then large releases of hatchery fish put wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? The enhancement program in PWS offers empirical support for the latter concept. Even during the recent period of generally high productivity, wild pink salmon production in PWS has fluctuated dramatically (Figure 9). In 2009, wild stock harvests were below one million fish, while over 17 million hatchery fish were harvested. By focusing harvest on hatchery fish, managers met escapement goals (Gaudet et al. 2017). Subsequently, both hatchery and wild pink salmon set new historical highs for harvest and production in 2013 and 2015. Large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

Authors

Alex Wertheimer retired after 35 years working for the National Marine Fisheries Service Fisheries as a Fisheries Research Biologist in Alaska. He has carried out research and published extensively on salmon in Alaska on issues including salmon enhancement technology and strategies, hatchery and wild salmon interactions, bycatch mortality of Pacific salmon, the impact of the Exxon Valdez oil spill on salmon in Prince William Sound, and the nearshore and pelagic marine ecology of Pacific salmon. He was a member of the science team that wrote the Alaska Genetic Policy, the National Oceanic and Atmospheric Administration (NOAA) Biological Review Team assessing status of Chinook salmon in the Pacific northwest, and the Chinook Technical Committee of the Pacific Salmon Commission. He was awarded the Wally Nuremberg Award for Fisheries Excellence by the American Fisheries Society Alaska Chapter. Upon retirement in 2009 after 35 years of Federal service, he received the NOAA Distinguished Career Award. Since retirement, he has continued to consult on scientific studies and reviews, including forecasting of Pacific salmon, quantification of by-catch mortality, and the Pacific Salmon Recovery Plan. He currently serves on the Pacific Salmon Commission's Standing Committee on Scientific Cooperation and on the Science Panel overseeing the Alaska Hatchery Research Program. He is the President of the Board of Directors of the Southeast Alaska Land Trust, and is a member of the Board of Directors for DIPAC, Inc., a major non-association private non-profit hatchery based in Juneau. He was supported in his work on this paper by the Northern Southeast Alaska Aquaculture Association.

William (Bill) Heard retired in 2012 after 52 years of Federal Service as Fishery Research Biologist. Much of his career was with NOAA Fisheries Alaska Fisheries Science Center's Auke Bay Laboratories, but he also worked for the U.S Fish and Wildlife Service Bureau of Commercial Fisheries and Bureau of Sport Fisheries and Wildlife. He did extensive research and published frequently on Alaska salmon and other fishes. Bill authored or co-authored peer reviewed publications on all five species of North American Pacific salmon. For over 35 years he supervised research at Little Port Marine Research Station focused on enhancement technology and ecology of pink, coho and Chinook salmon. He actively participated on many technical committees and focused groups involved with Alaska, National, and International salmon issues, including Governor Jay Hammond's Fisheries Council concerned with policies and development of salmon hatcheries in Alaska, North Pacific Fishery Management Council Plan Development Team for Fishery Management Plan (FMP) on salmon fisheries, Pacific Salmon Commission (PSC) Northern Boundary Technical Committee, North Pacific Anadromous Fish Commissions (NPAFC) Committee on Scientific Research and Statistics (CSRS) and U.S.-Japan Natural Resources (UJNR) Aquaculture Panel involved with salmon hatcheries in Japan. Participating in NPAFC, PSC, and UJNR afforded opportunity for travel to most North Pacific rim countries with populations of salmon including Russia and Republic of Korea . Bill received fre awards for research excellence in fisheries from ADF&G, Alaska Chapter American Fisheries Society, U.S. Department of Commerce Bronze Medal Award, NOAA Fisheries Employee of the Year and NOAA Fisheries Distinguished Career Award. He was an Affiliate Associate Professor, University of Alaska Fairbanks, School of Fisheries and Ocean Sciences.

Figures

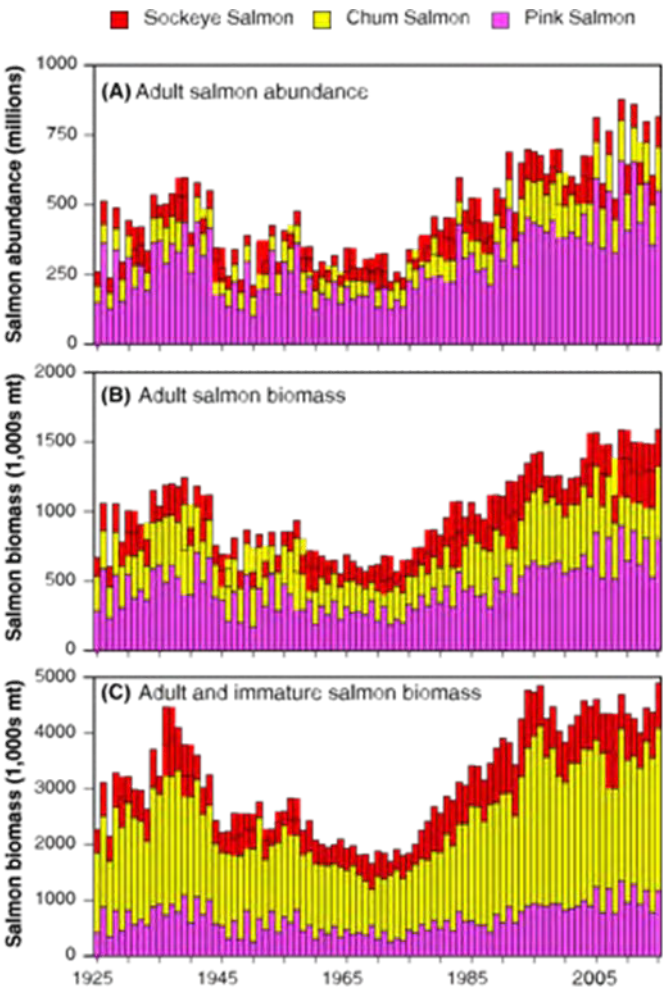

Figure 1. (A) Abundance (millions of fish), (B) adult biomass (thousands of metric tons), and (C) adult and immature biomass (thousands of metric tons) of Sockeye Salmon, Chum Salmon, and Pink Salmon in the North Pacific Ocean, 1925–2015. From Ruggerone and Irvine (2018).

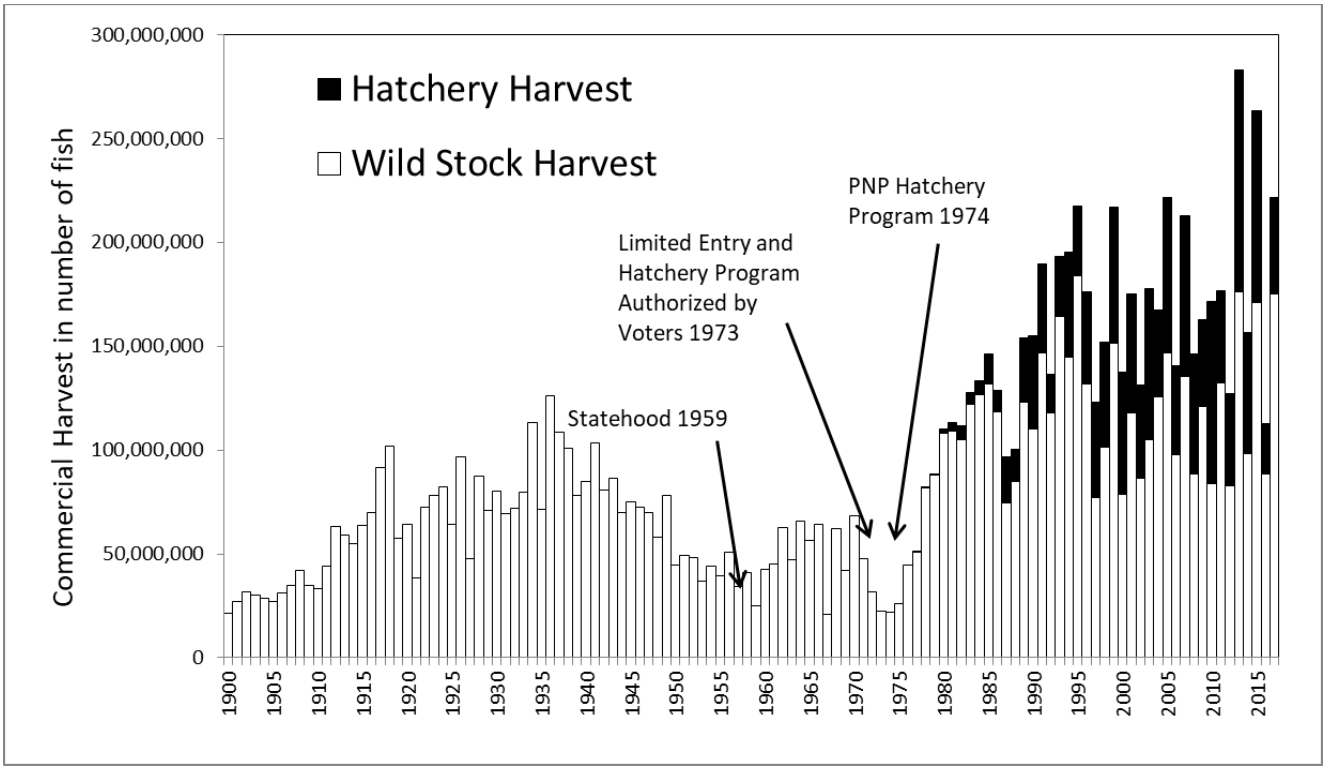

Figure 2. Commercial salmon harvest in Alaska, 1900-2017. From Stopha (2018).

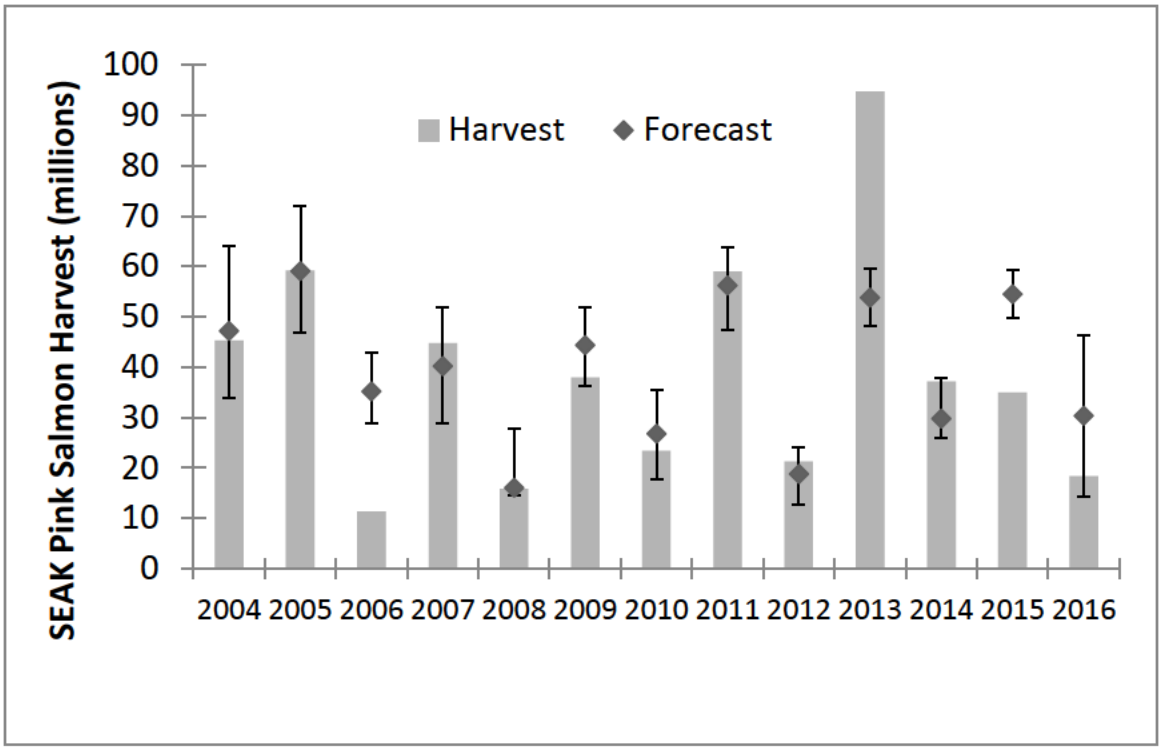

Figure 3.—Southeast Coastal Monitoring (SECM) project pink salmon harvest forecasts for Southeast Alaska (SEAK; symbols), associated 80% confidence intervals (lines), and actual SEAK pink salmon harvests (grey bars), 2004-2016.

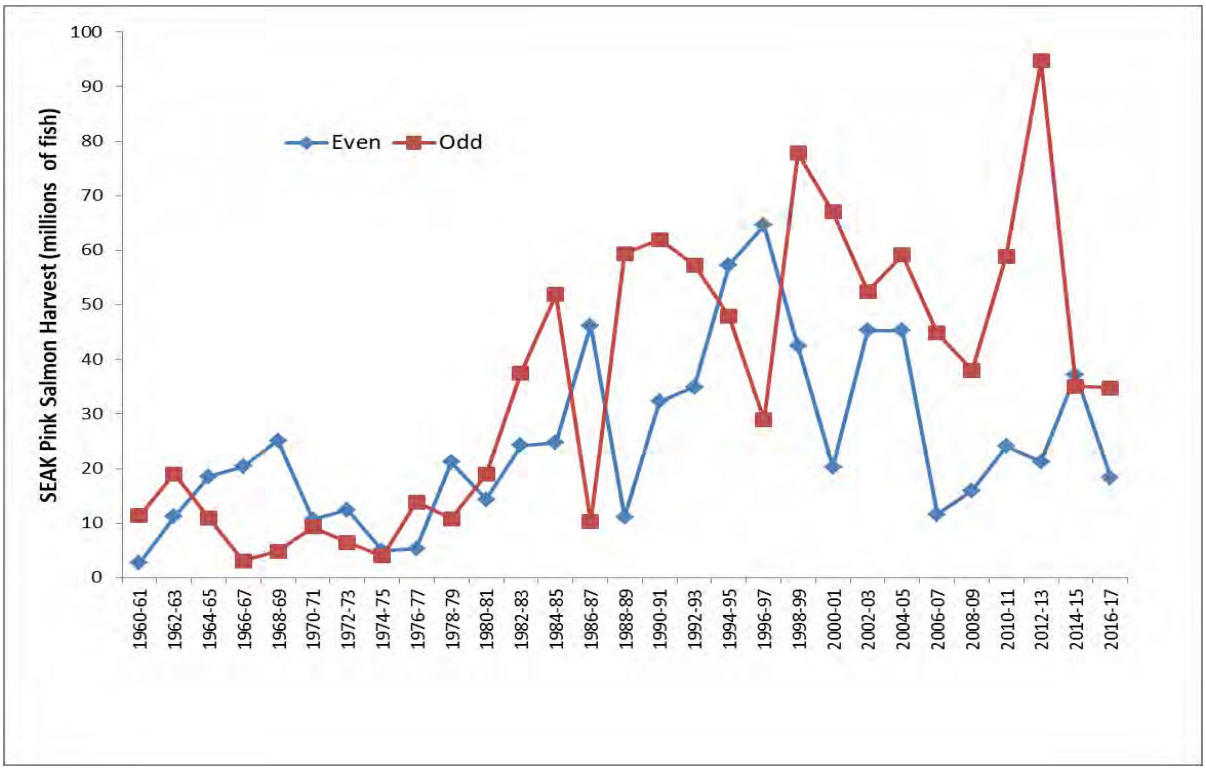

Figure 4. Even- and odd-year harvests of Southeast Alaska pink salmon, 1960-2017. Data are from Alaska Department of Fish and Game catch statistics.

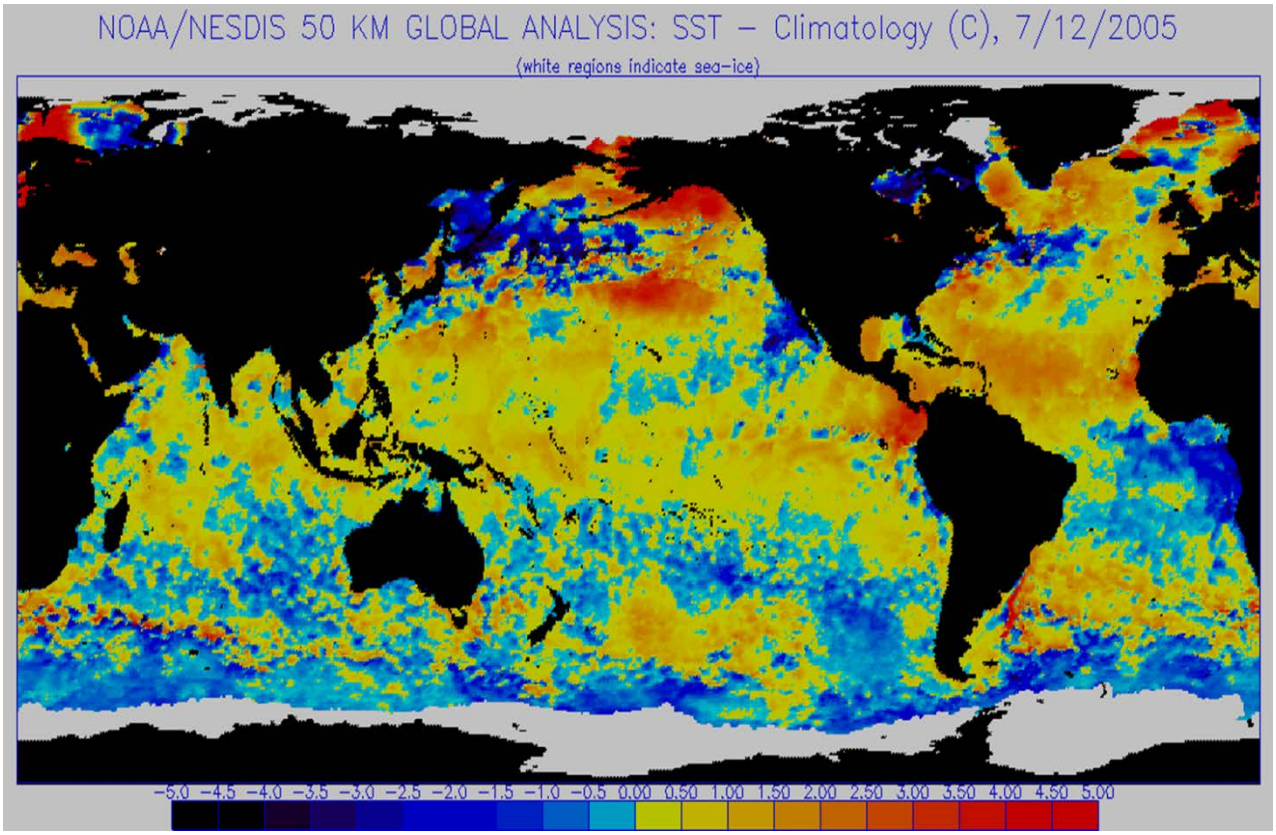

Figure 5. Sea surface temperature anomalies, July 12, 2005. NOAA Satellite and Information Service, National Environmental Satellite, Data, and Information Service (NESDIS) http://www.osdpd.noaa.gov/PSB/EPS/EPS.html

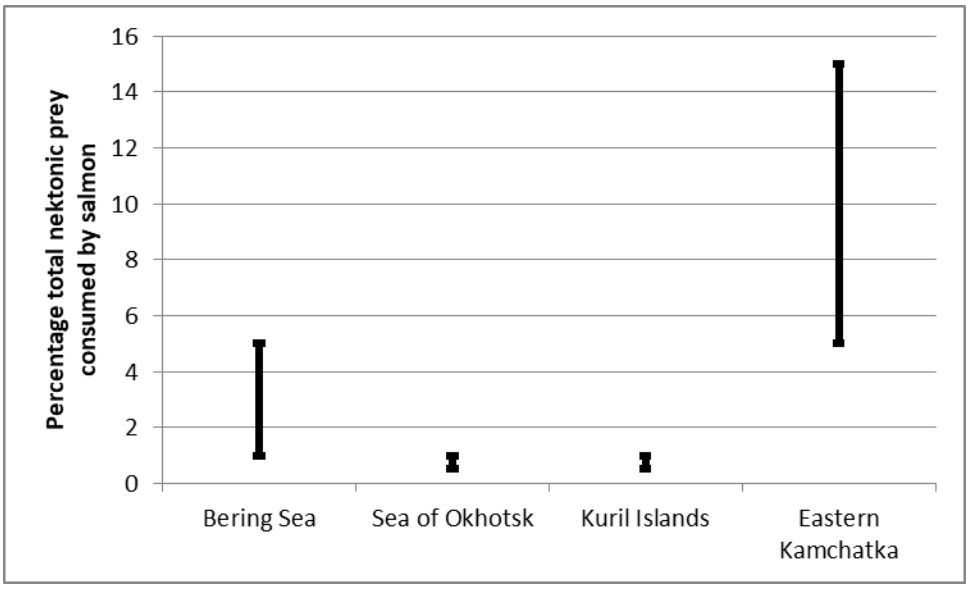

Figure 6. Percentage total nektonic prey consumed by salmon in the western North Pacific Ocean. Estimates are from Shuntov et al. (2017).

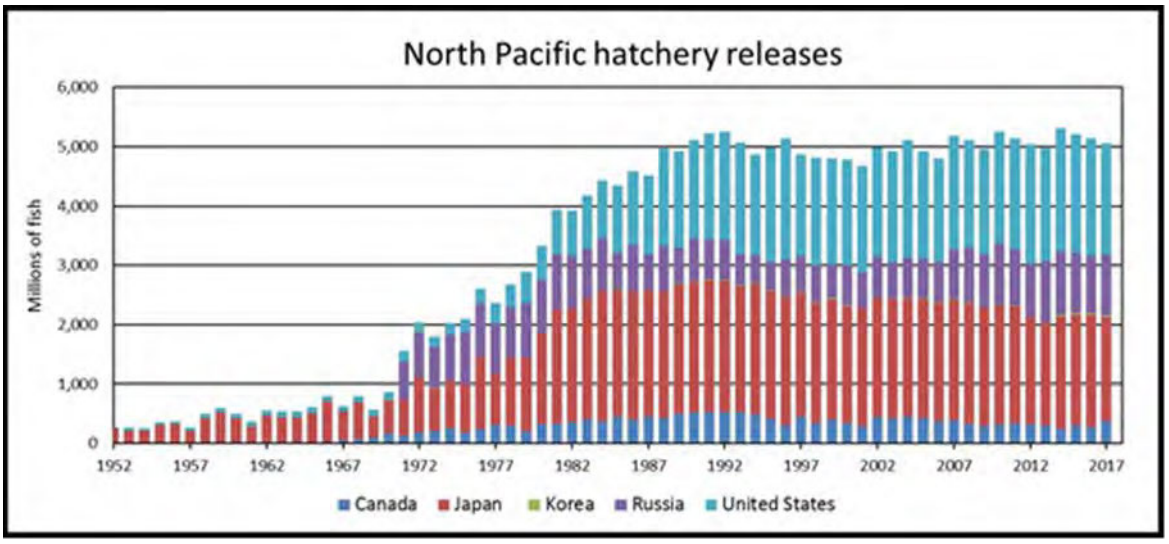

Figure 7. Hatchery releases of salmon into the North Pacific Ocean, 1952-2017. Source: North Pacific Anadromous Fish Commission.

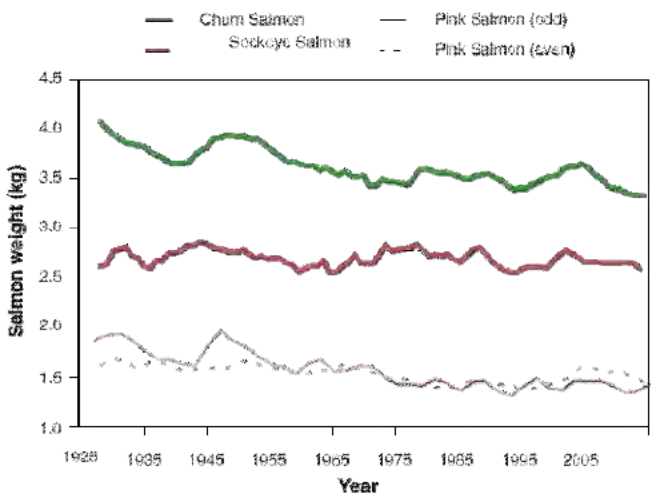

Figure 8. Average weight of pink salmon, chum salmon, and sockeye salmon captured in commercial fisheries, 1925-2015. From Ruggerone and Irvine (2018).

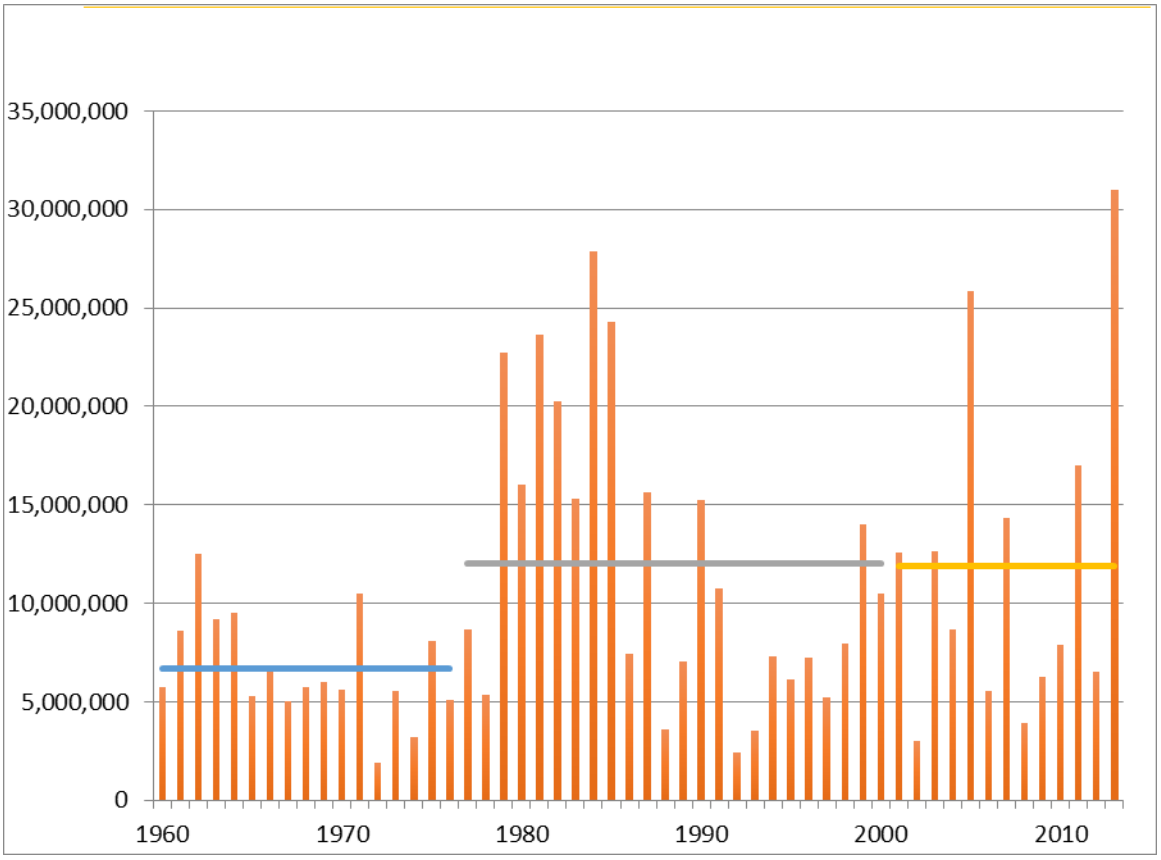

Figure 9. PWS Wild Pink Salmon Production for 1960-2013. Lines indicate average production for pre-hatchery years (1960–1976) and two hatchery time periods: 1977–2000 and 2001–2013. From Gaudet et al. (2017).

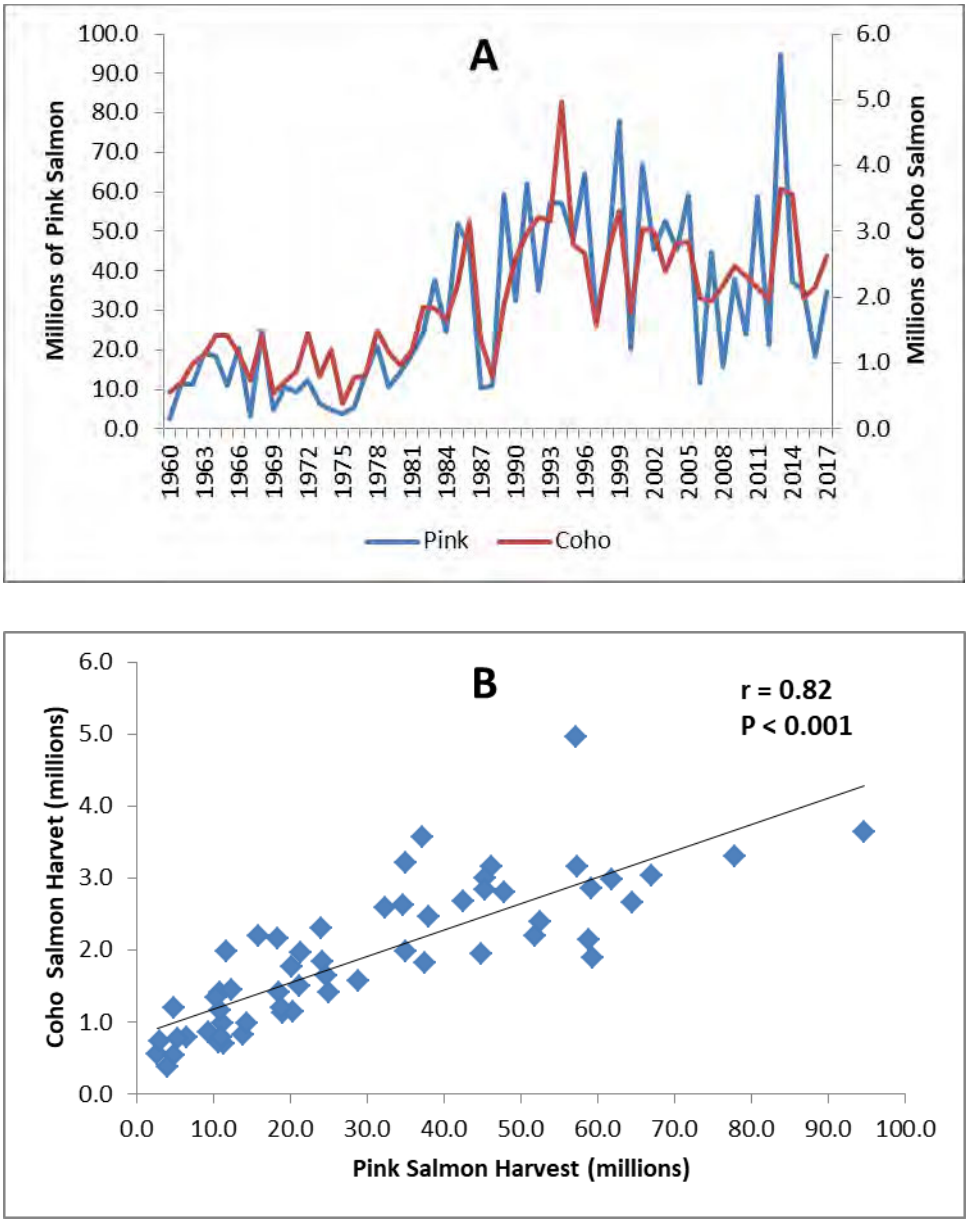

Figure 10. Commercial harvest of Southeast Alaska pink and coho salmon, 1960-2017 (A), and their correlation (B). Data are from Alaska Department of Fish and Game catch statistics.

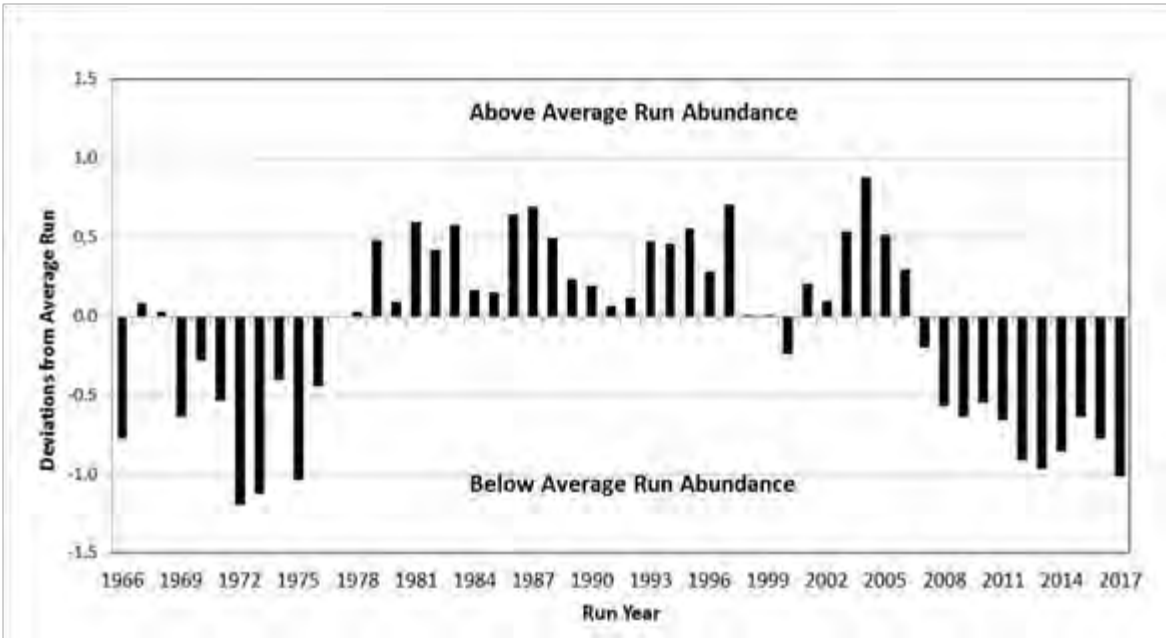

Figure 11–Average of standardized deviations from average run abundance for 21 stocks of Chinook salmon in Alaska (the Unalakleet, Nushagak, Goodnews and Kuskokwim in western Alaska; the Chena and Salcha on the Yukon River; the Canadian Yukon, the Chignik and Nelson on the Alaska Peninsula; the Karluk and Ayakulik on Kodiak Island; the Deshka, Anchor and late run Kenai in Cook Inlet, the Copper in the northeastern Gulf of Alaska, and the Situk, Alsek, Chilkat, Taku, Stikine, and Unuk in Southeastern Alaska). From CTC (2018a).

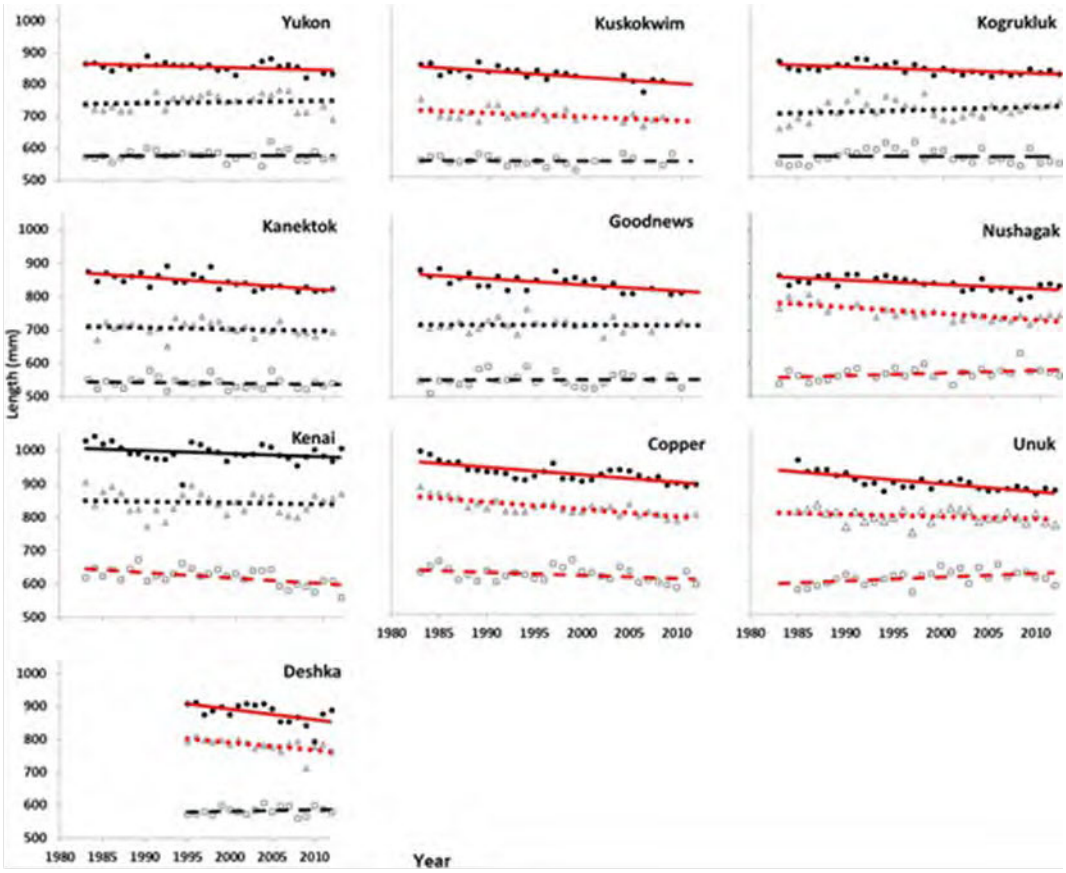

Fig 12. Linear regression of mean annual length (mm) Chinook salmon by stock, age class, and year. Closed circles and solid line = 4-ocean; triangles and dotted line = 3-ocean, open square and dashed line = 2-ocean. Red lines indicate slopes significantly different from zero ($P < 0.05$). From Lewis et al. (2017).

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Prince William Sound Aquaculture Corporation
DEVELOPING SUSTAINABLE SALMON FISHERIES FOR ALASKA AND THE WORLD

February 7, 2024

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC opposes Proposal 43

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization, employing 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds $14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors. Since inception, PWSAC has returned on average 70% of fish produced to common property fisheries.

Proposal 43 –5 AAC 40.820. Basic Management Plan

Proposal 43 looks to reduce hatchery production to 25% of the year 2000 production by amending the *Cook Inlet Salmon Enhancement Allocation Plan*. This proposal in similar form has asked the board to reduce hatchery eggtakes on at least three other occasions. With unsubstantiated claims, each time the board has rejected the proposal that would dramatically affect fishermen's small businesses, families, as well as sport, subsistence, and personal use programs across large regions of Alaska.

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

Proposal 54 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend the PWS Management and

Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 94 opposed)**

Proposal 55 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

The assertion of over-production of hatchery fish is not supported by Ruggerone and Irvine (2018) or the North Pacific Anadromous Fish Commission who provides the best available data on numbers and biomass of hatchery and natural origin adult (mature) and juvenile (immature) salmon. PWS pink production for example has been relatively stable since 1990, 30+ years. Estimates for the years 1990-2015, PWS adult and juvenile hatchery pink salmon biomass average <8% of the total pink salmon biomass in the North Pacific Ocean. When the adult and juvenile chum and sockeye salmon biomass are included for the same time, PWS adult and juvenile hatchery pink salmon biomass is estimated to average <2% of the annual total biomass for these three salmon species in the North Pacific Ocean. The vast majority of pink salmon in the ocean at any given time are of natural origin. When further compared to other pelagic fish (herring, pollock, cod, flatfish, squid) PWS hatchery pink biomass is estimated to average <0.03% of the total North Pacific Ocean food chain.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. PWSAC also supports the iterative process involving department staff, hatchery operators, and stakeholders. In the absence of compelling data or analysis supporting a reduction for conservation reasons, any significant changes need to be thoroughly examined by hatchery board members for hatchery needs and consider stakeholder input to ensure a well-informed decision.

Over the last 40 years Prince William Sound Aquaculture's programs have been an enormous success in helping rebuild Prince William Sound salmon stocks from the historic lows of the 1970s. Alaska's Salmon Hatchery Program has provided hundreds of millions of dollars in economic activity across the state since its inception and fed billions of people across our globe.

It is important to note that hatchery associations, ADF&G staff, and BOF members have spent considerable time and money addressing repeat proposals. Author and word changes have not brought any new or substantive information to the table. There is no supporting data that suggests these repeat proposals would help the intended stakeholders, but it is clear a proposal such as 43 would definitively hurt many more in the process.

PWSAC **opposes Proposal 43** and would respectfully ask that **the board reject Proposal 43** or any other request to reduce hatchery production that would usurp aquaculture associations board's ability to establish annual goals and to operate hatchery operations with fiscal and fiduciary responsibility. PWSAC has returned on average since inception 70% of fish produced to common property fisheries.

We look forward to working with Board of Fish members to answer any questions they have and help inform the public process during the meeting.

Sincerely,

Geoff Clark
General Manager/CEO

P.O. Box 1110 · Cordova, Alaska 99574
P. 907 424 7511 · F. 907 424 5508

www.pwsac.com

Submitted by: Nicholas Raggio
Community of Residence: sterling, VA

As an east coast resident, I'm one of the people who loves the yearly striped bass fishing. The striped bass are in a similar condition as current salmon. sometimes extreme measures need to be taken to insure the future success and profitability of a fishery. striped bass have had booms and bust. currently we're in a bust but it's for better future fishing which is why I'm in support of proposal 83, which as I understand it, should be the beginning of improving the species. while it's understandable that some people have their livelihoods wrapped up in fishing, these same people will be only shooting themselves in the foot if the status quo isn't changed

February 8, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

We have been running a small ship cruise business in Prince William Sound for over 30 years. We support Prince William Sound Aquaculture's ongoing salmon hatchery program for a number of reasons. Obviously, hatchery salmon production is a huge, if not the greatest, economic engine in our region. We, as long time tour operators, visit some of the local hatchery locations regularly to show our paying guests how successful the salmon hatchery program is and how other wildlife such as bears, sea lions, eagles, etc., thrive, because of the high returns of hatchery reared salmon in these locations. We also visit many local PWS streams via skiff, kayaks, and hiking where we get to see the natural runs of salmon unfolding annually. In our over 30 years of visiting 100s if not 1,000s of salmon producing wild rivers and streams in the PWS area, we have not seen any noticeable reduction in wild salmon runs with the exception of some smaller streams in the central Sound area such as Knight Island, where there was serious damage to the local runs caused by the 1989 Exxon Valdez Oil Spill.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked

with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Dean Rand
[redacted]
Whittier/Cordova, Alaska

February 02, 2024

Dear Chairman Wood and Board of Fisheries members:

I do most of my sport fishing on the Kenai Peninsula, mostly for sockeye. I used to fish for kings as well, but of course, that's no longer a real option. My wife and I depend on our annual trips to the Russian and occasional dipnetting trips to the Kenai to put enough salmon in the freezer for the year and have been doing so for over 35 years.

I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye. Many families depend on a sustainable source of protein that we can eat all year round, and we should be getting better treatment from the board. Commercial interests should always be secondary to the needs and preferences of Alaska citizens.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Tom Reale
ANCHORAGE, AK

PC179

Submitted by: Brian Reid
Community of Residence: Eagle river, alaska

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The angers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

PC180

Submitted by: Micah Robert
Community of Residence: Kenai, AK

King salmon in the Kenai need better protection, set nets are an issue that regardless of the allowed take kill kings. Additionally, target run numbers should be increased to 40,000. The current runs are not sustainable and lowering the goal will only make the problem worse. We should not be so greedy as to kill tomorrows opportunities to bring in more money today.

Proposal 83: Support

PC181

Submitted by: Lisa Rodgers
Community of Residence: Kenai, AK

Tikahtnu' is the Dena'ina name for Cook Inlet meaning Ocean River & Lord Ruler is our chinook salmon named by my father who has fished our land & waters since the late 50's.

I, acknowledge the Dena'ina as the traditional owners of the land on which our family lives and salmon fish. I respectfully also honor the Inupiat, Aleut, Eyak, Tlingit, Haida, Shim-She-Un and a number of Northern Athabaskan people as stewards of the land. I PAY RESPECT TO ALL ELDERS PAST, PRESENT and EMERGING.

My question to our board of fish is, do you?

I am an Alaskan born & raised native women who owns, runs and operates our set net site along the Cook Inlet. Our family has fished these waters for over 100 years. I am 3rd generation commercial fisherwoman, passing it down to my children and their children, making our fishery a 5 generation legacy .

This last summer 2023, I couldn't help but wonder what would our ancestors & elders say of our dying resource which God created to be naturally sustainable and renewable as the most valued resource to our livelihoods nutritionally and spiritually?

Sitting above on the bluff and looking down at the inlet and watching the salmon swim by was devistating and heartbreaking. For the first time in our fishing history our small business was forced to be shut down along with three hundred plus other permit holders/family run businesses. While all the other fisheries surrounding us had the opportunity to salmon fish.

It's really hard not to take our recent 2023 season closure personal.

Our fishery has experienced endless regulation changes from our gear type to how many days we can fish. To not give up on our industry & lifestyle we keep adapting to them.

Our fishery has had so many restrictions and forced regulations - and eventually for the very first time in fishing history an entire season shut down - it's all been taken away from us. What more can we give? Even with our nets out of the water last season the king numbers didnt change, they are the same as they were 4/6 - 15/20 years ago.

Our nets have been on restriction & tucked away in our totes all season long & the escapement numbers for the large kings are relatively identical to 6 plus generations of Chinook...approx. 36-40 years.

The high end of a king salmons life span is 7 years. Once they hatch to fry, they stay in fresh water one and sometimes two years. If you take a maximum of 7 year old king and go back 6 generations at maximum age that is 7x6=42 years ago. That's if they live to be 7, which very few do.

The large kings aren’t going to come back in any number good enough to satisfy any specific user group, ever again.

Unless we listen to the people who have fished and sustained these species longer than most have been alive...the local commercial fisherman. Have you ever taken into consideration to talk to the ones who have more experince & knowledge than most of your board members?

They aren’t staying in the ocean long enough to be massive like they used to be.

The big ones are getting caught by trawlers and are competing for food.

The whales eat them.

Sharks eat them.

Trawlers scrape them off the ground floor all the way to the surface and are allowed to throw them back dead as bycatch...wasted.

They get caught on their spawning grounds and also at the same time flushed from them while being chased out of the river and back to sea all the while being robbed of what strength they have left to continue the cycle.

Data proves almost 40% of sport caught salmon hooked and released die before spawning; in other words wasted.

Yes, commercial set netters ocassionally catch a chinook, but not as often as most have been groomed to believe. Most the chinook we've caught are blushed and/or have hooks in them meaning they were in the river.

When we caught them they were either kept for personal use or sold, always cherished, but never ever wasted or taken for granted.

And for each king we caught we were enforced and regulated to report how many we caught.

We are the only fishery that is enforced to report how many we caught. Sport fishery doesn’t have to report how many kings they caught, nor substance or trawlers. Only us. Why is that?

Back in the inlet they are unable to preform what nature intended them to do…. Spawn.

And they don't start eating again either.

Fresh water tells them it's time to spawn and their oil content is their energy to do so. Once released or forced back to sea it is mostly a suffocation death or death by exhaustion.

Not saying killing any salmon is fun or enjoyable for either party, however our nets have been made and designed, mostly by conservative commercial fisherman who are conservationists by nature that don't want to catch "them all" and work themselves out of annual income, careers, and future opportunity.

This sacred resource has been molested and abused and treated like an entitlement to those who are purely blinded to their true nature & essence.

Humans have this sense of entitlement of greed & ego to harvest these treasures of the sea to mount on their walls & stories to share with their buddies.

I can tell you, this is not how god intended this sacred salmon to be used as.

Most won't appreciate when I say this but the river system is where it should be shut down first as that is where the magic take place.

To create more babies in families, it's done in the intimacy of your bedroom, in a sacred space. It's the same for our fish, caribou, moose, all of our sacred creatures of the earth

How would you like an audience in your sacred space poking & proding you while you are putting in the intentional effort in the making to create new life? You wouldn't!

The king salmon are not staying out in the ocean as long as they used, which used to be 5/6 years. Now because of all these factors they are coming back earlier after year two, three or even fours years of age which means they are coming back smaller.

Smaller as in 34 inches and most likely getting counted as a red salmon thru the sonar versus a large size king salmon over 34 inches.

There are larger species of salmon & other fish that are over 34 inches like large rainbow trout, silvers, chums and reds that are all over 34 inches.

Which are most likely getting mistakenly counted as a large king over 34 inches.

As I sit in silence I hear the words of our ancestors and they say,

The Spirit of the King Salmon and the Wisdom within them is here to teach us but are we humans paying attention?

These majestic giants of the sea represent authority, power, grandeur, and leadership.

What's ironic is is their own spiritual medicine is what's decimating them from earth!!! By the hands of us humans.

Put the *authority* back in the fish they will rebound!

Put the *power* back in the fish and they will rebound!

Take the govt power out of nature! When has gov intervention made anything better?

They are not following the Science for our fishery.

They need to go back to science and leave politics out of it.

Perhaps it’s time for those in power of our fishery begin to reflect on the wisdom these royal salmon have to tell us instead of padding their pockets

It’s time we begin to learn from the Salmon on what they have to teach us by their wild, natural and untampered spirit.

You won’t ever find a salmon that is confused on who he/she is or undeceived . They haven’t been injected with the poison of society, media, social media, peers etc.

They are who they are.

Wild and untethered

This is so overwhelming with all these proposals, managment plans and arguments. What happened to letting science & nature dictate our fishery? Instead it's become a game of politics.

We need to leave partisan politics out of the issue and simplfy the fishery for Alaskan user groups and residents as the primary. Our local town of Kenai took a huge defecit to the economy last year and a hard hit for the past ten years with restriction after restriction. Most of us permit holders are full time and permanent residents of Alaska who spend our hard earned money here in our very own state. In the summers our fishery feeds the Kenai Peninsula with our income and also feeds Americans products they most times can't get.

Proposal 77: Support Proposal 80: Support Proposal 81: Support Proposal 85: Support
Proposal 86: Support Proposal 90: Oppose Proposal 101: Oppose Proposal 106: Oppose
Proposal 109: Oppose Proposal 110: Support Proposal 111: Support Proposal 112: Oppose
Proposal 113: Support With Amendments Proposal 114: Support With Amendments
Proposal 115: Support With Amendments Proposal 116: Support Proposal 117: Support
Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 126: Oppose
Proposal 127: Oppose Proposal 128: Support With Amendments
Proposal 130: Support With Amendments Proposal 131: Oppose
Proposal 132: Support With Amendments Proposal 133: Oppose
Proposal 134: Support With Amendments Proposal 135: Oppose
Proposal 136: Support Proposal 137: Oppose Proposal 139: Support With Amendments
Proposal 140: Support With Amendments Proposal 141: Oppose Proposal 142: Oppose
Proposal 143: Support With Amendments Proposal 144: Support Proposal 145: Support
Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support
Proposal 150: Oppose Proposal 151: Support Proposal 152: Support Proposal 153: Oppose
Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose
Proposal 158: Oppose Proposal 160: Support Proposal 161: Support Proposal 162: Oppose
Proposal 163: Support Proposal 164: Support Proposal 168: Oppose Proposal 169: Oppose
Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Support
Proposal 174: Oppose Proposal 176: Support Proposal 177: Support Proposal 178: Support
Proposal 179: Support Proposal 180: Support Proposal 181: Support Proposal 183: Oppose
Proposal 185: Support Proposal 186: Support Proposal 189: Support Proposal 190: Support
Proposal 191: Oppose Proposal 192: Oppose Proposal 193: Oppose Proposal 194: Oppose
Proposal 195: Support Proposal 196: Support Proposal 197: Support Proposal 198: Support
Proposal 199: Support Proposal 200: Support Proposal 203: Oppose Proposal 205: Oppose
Proposal 207: Oppose Proposal 208: Oppose Proposal 209: Oppose Proposal 210: Oppose
Proposal 211: Support Proposal 212: Oppose Proposal 213: Oppose Proposal 214: Oppose
Proposal 215: Support Proposal 217: Oppose Proposal 230: Oppose Proposal 231: Oppose
Proposal 232: Oppose

PC181

Submitted by: Lisa Rodgers
Community of Residence: Kenai, AK

Please add this to my prior submission

I am proudly a Kenaitze Tribal Member and a shareholder of the Bering Straits Native Corporation and descendent of the Aleut Corporation.

Trevor Rollman
PO Box 7073
Nikiski, AK 99635
[redacted]

Board Member – Northern District Set-Netters Association

I am submitting these comments on behalf of myself and my family, NOT the NDSNA.

Cook Inlet Set-net Permit Holders: Trevor Rollman (2), Tom M. Rollman, Ella Rollman, Brandt Rollman

We fish sites near Moose Point in the Eastern Sub-District of the Northen District, about halfway between Kenai and Anchorage. Our family is in its third generation fishing these sites where my father Tom began in 1971.

My primary submission is an article I wrote for the Mat-Su Valley Frontiersman this past fall, entitled Northern District Commercial Fishing Perspective. My intent is that this essay will serve as background information for you, the Board of Fisheries members as you consider the litany of proposals aimed at restricting and closing much of our traditional fishery. After the essay I'll offer comments on discrete proposals with insight on falsehoods and misleading rhetoric as well as new information not in the essay.

This essay has information pertinent to Proposals 210, 212, 213, 214.

Northern District Commercial Fishing Perspective (Frontiersman; August 31, 2023)

Every summer, one of the Valley's prominent professional sport-fishing guides pens a weekly column in the Frontiersman updating anglers on fishing opportunities and conditions. He often also uses this opportunity to offer his opinion on why catching isn't optimal and regularly pins the blame on the Northern District commercial fishermen and ADF&G's failure to restrict them more. I am one of those commercial fishermen and I'm offering this article as a counter to the misinformation given about our fishery in one of the most recent articles, "'Management Trainwrecks' . . .". I'd also like to reasonably show that our small fishery cannot affect sport-fishing success in any manner near to what this columnist would like everyone to believe, and garner some support for the traditional livelihoods of Northern District commercial fishermen in the eyes of the public.

I have been set-netting for salmon near Moose Point on the Kenai Peninsula since I was a child with my family in the mid-80s. Mom and Dad began fishing there in 1970 and I have carried on with my wife and 3 kids taking over the operation about 10 years ago. In 2017 we began Rollman Family Salmon LLC to be able to sell our catch directly to the public and have since provided salmon to hundreds of families in the Valley, Anchorage and on the Peninsula.

Conflict between user groups is nothing new; sport and commercial fisher-folks have been accusing each other of getting more than they deserve forever. The question is, is each group being given a reasonable opportunity? The author claims that our opportunity is "unfair", saying things like "they are allowed to harvest salmon without limit." I'll provide a handful of facts to correct these assertions and balance the conversation around reasonable opportunity.

First and foremost, there is one primary, simple and sobering piece of information the public needs to know about our fishery with regard to reasonable opportunity. Here it is: Northern District commercial fishermen, at the full extent of their legal ability, are allowed to use three set-nets, each 210 feet long, during two (2) fishing periods per week - Mondays and Thursdays, 7 AM to 7 PM. That is all we are allowed, unless given extra time by Emergency Order, which has happened only twice in the last 35 years.

In other words, at full strength, we get to *try* to harvest salmon for 24 hours per week, or the equivalent of one out of seven days, and that's when the weather allows, the tide is in, and driftwood doesn't prevent us from fishing. This means fish get to swim freely through Northern Cook Inlet a minimum of six out of seven days per week. 1/7 is hardly an unreasonable or "unfair" opportunity. The article asks for "setting commercial regulations at a more realistic level." Is this level not realistic? Common sense should tell anyone that when fish are allowed to freely pass 6/7 of the time, our small fishery of less than 100 permits – even when fishing full-strength (which we often are not) – cannot consequentially impact runs to Northern District streams. I could rest my case there, but if you're curious to learn more about our fishery, read on.

Of those 100 or so permits, they are spread out over 100 miles of coastline in a body of water that averages nearly 15 miles across. Our nets are needles in a huge haystack which the fish only get to look for twice a week for 12 hours.

And speaking of Northern District streams, here are some more pertinent facts for consideration: Our fishery catches salmon going to over 1000 different streams – not just favorite sport fishing locations like Deshka, Little Su and Jim Creek. According to the Anadromous Waters Catalog there are over 600 different streams in which coho salmon are present in the Northern District. Most of these 600-plus streams are in pristine watersheds that rarely, if ever get tracked by a human foot. Only about 6 of them are enumerated for escapement by ADF&G. The only streams with salmon-counting weirs for Coho are the Deshka River, the Little-Su, Fish Creek and Jim Creek. That's it. These are four of the most heavily trafficked and fished in streams in the entire Mat-Su and yet they are utilized as the primary index for the health of coho runs throughout all of Northern Cook Inlet. When there aren't enough fish counted in even two of these weirs, regardless of what may actually be happening at the hundreds of other streams, commercial fishing in the Northern District usually gets restricted or closed.

At the time of writing this article, we have been closed by emergency order for 2 weeks because of low coho passage at the Deshka and Little-Su weirs while Jim Creek and Fish Creek have met their minimum escapement goals. Sport fishing for silvers at Deshka and LIttle-Su is also closed, appropriately. But, anglers can still bag 1 silver on many upper Susitna tributaries and Fish Creek. That is opportunity being given to sport fishermen while commercial fishermen have no opportunity. But don't read me wrong - I'm not saying I think we should be fishing right now. If it is a bad year for coho, which it seems like it is, then we should all be closed. We commercial fishermen are happy to share in the burden of conservation for the sake of the resource - I applaud ADF&G for sound science and doing what is best for the fish. Conservation of the resource is of paramount importance and each user group should bear that burden equitably.

Another way the author spreads misinformation is through his rhetoric. One of his favorite adjectives for our fishery is "liberal". He used a variant of it seven times in the "Management Trainwrecks" article alone. The average reader would think from his language that this meant we were allowed to fish extra time or get to use more than three nets. On the contrary, for the last 20 years or so, every season for

five consecutive fishing periods during the peak of the red run, ADF&G has reduced our number of nets from three per-permit down to one. It seems the author has gotten used to this annual restriction on our ability to remain viable (many have quit over the years because with one net they can't make it pay) and in his mind our restrictions have become codified. So, when in more recent years the Department has relaxed the restriction from one net to two in part of our district he asserts that we are being "liberalized", propagandizing in his column that the Department has "doubled" our nets. The truth is that we were still being restricted to ⅔ of our regular gear, and still only fishing two days per week. Those are the facts. Now for a little perspective from the commercial fisherman's side.

We all like to recall the glory-days of last century when nearly every Alaska stream was teeming with salmon. Unfortunately for all of us, this is not our current reality. Everyone wants to know how we got here and who is responsible. It is always easiest to point fingers while not examining one's self, which is exactly the approach of the author. Undoubtedly, the influx of human beings into south-central Alaska and our activities here are the culprit. Which specific activities? - that's the question. The Alaska Department of Fish and Game has proven to be a phenomenal manager of salmon runs, optimizing returns when other variables are kept to a minimum - Bristol Bay has been a model for the world in successful salmon stock management. Consider for a moment if the Cook Inlet region had never been populated by hundreds of thousands of humans and there was only a well-managed commercial fishery here. I believe our incredible ecosystems would be producing salmon on par with Bristol Bay. But, with people abounding in watersheds and multiple user groups clamoring for salmon stocks that overlap each other in the Inlet and the rivers, there are more variables than Fish & Game managers can be expected to overcome. Judging from the blame he places on ADF&G for the lack of salmon in the most heavily fished sport fishing streams in the Valley it seems the author expects the Department to wave its magic wand and make more salmon appear. A discussion of human-induced deterioration of spawning stream habitat must be on the table. The problem of over-loving salmon streams is real. Rubber tire particle run-off contamination is a science proven problem for salmon reproduction. We must safeguard habitat so that we don't turn into the Lower 48. And, maybe enhancement/stocking programs are needed on the most popular sport-fish streams to offset low production and increase sport-harvest – stocking has produced bountiful sport harvests at Ship Creek and Eklutna so far this year. These are all action items.

I hope the next time you read one of these weekly fishing reports you remember the information presented here (1/7, 6/7) and aren't fooled by the rhetoric into thinking that the Northern District commercial salmon fishery is getting anything but a reasonable opportunity to make a living.

Trevor Rollman is a husband, father, former resident of Wasilla, current resident of Soldotna and second generation set-netter on the east side of Cook-Inlet's Northern District.

<u>Proposals 75-115 General Commentary on Kenai River King Salmon Sport Fishery (rationale to be applied to any King Salmon sport fishery, including ND)</u> –

I think it is a terrible idea to allow fishing for King Salmon in one of their most vulnerable and concentrated venues, their spawning beds. It is understandable that when sport fishermen first discovered these prime fishing holes they exploited them. Anyone would do it. We humans did the same thing with fish traps. We identified a very successful way of harvesting and exploited it. But, when we realized this was too effective, decimating Cook Inlet's salmon populations, we outlawed it and required fishermen to use alternate methods of harvest. Just because we have been doing it forever doesn't mean it can go on sustainably. I believe it is time to outlaw sport fishing for King Salmon in

spawning holes on the Kenai River, and any river for that matter. If we are going to target king salmon by sport fishing, it should never be in a spawning bed and may need to be kept out of rivers all together.

Umbrella Comment for Proposals 131-252:
To avoid having to mention it repeatedly in each comment, I'll make a blanket comment here which I also noted in my essay. In many of these proposals the adjective "liberalized" is used to describe what happens when Northen District set netters get our second or third net back during or after the annual restricted period that lasts from July 20th to August 6th. A more accurate and appropriate term would be "restored".

Discreet Proposal Comments:

131 & 132 – In Favor – Getting to increase our weekly fishing time from 1/7 of the week to 3/14 would be great.

134 – In Favor – Two, 12 hr periods a week is predictable, reasonable and sustainable opportunity. It allows for fish passage at least 6/7 of the time.

137 – Opposed – The Susitna River already has a commercial fishing boundary established at its mouth. This is unnecessary. It has already been established where commercial fishing can't happen. Passage of this proposal may cause Shore-Fishery Leases from the State to be revoked and it would put a traditional family fish-site out of business.

142 & 239 – In Favor – I think differentiating between Jacks and big Kings is a good idea. Including Jacks in the counts is giving everyone a false sense of King escapement.

143 – Opposed – Set net fishermen have had to choose where they fish for a reason. There are advantages and disadvantages to each of the different annually permanent fishing districts. You choose one and stay there. Many families have long-established traditional fishing locations that are honored by all the fishing neighbors. This proposal would likely encourage an influx of opportunists who will likely squeeze in on established fish sites, potentially fishing too close or even site jumping, causing grief for everyone, including law enforcement.

43 – In Favor – I think we have messed with ocean ecosystems enough by pumping millions of pink salmon out there. Could they be affecting King salmon populations by consuming the same ocean food supply? I don't fish pinks so it is easy for me to say that this enhanced fishery is over-enhanced and would be better if it went away, and I wouldn't like it one bit if the shoe was on the other foot. WE need to do what is best for ecosystems and salmon at large and it doesn't seem like artificially bolstering pink salmon populations is helping in that regard.

205-210 - General Commentary on suite of Proposals aimed at restricting or closing the Northern District Commercial King Season –

King season in the ND has been an opportunity for commercial fishermen to diversify their catch early in an unpredictable line of work. It provides fishermen a "warm-up" to the sockeye season and an opportunity to catch a few early fish that command a high price. If the ensuing red season isn't good, the money made during king season can offset what otherwise could be a losing year. Therefore, any of these proposals aimed at restricting or closing the King season will make it more difficult for ND commercial fishermen to stay in business.

Lacking in any of these proposals is any responsibility for or acknowledgement of, by the proposers, the rivers and drainage habitat and what affect the sport fishing user group has had and is having. I make this general argument in my essay more aimed at the Sockeye and Coho stocks, but please take into account the same rationale with regard to kings. Over-using streams is a real problem that is hurting the resource. The answer cannot be to just get rid of the user group in front of you. We all need to clean up our own back yards. We have to work to revive the resource and share that responsibility. Commercial fishermen give 2% of our revenue to Cook Inlet Aquaculture for this purpose.

205 – Opposed – Taking the Northern District King Salmon Management Plan off the books is not necessary and would take away permanently what hopefully may one day again be an opportunity for commercial fishermen to diversify their catch toward a viable season.

At the last board cycle Northern District Set Netters and Valley Sport Fishermen worked hard together and came up with the current King Salmon Management Plan which is equitable and is working well. It has enacted equitable paired restrictions, most recently closing the commercial king season entirely in 2023. If we need to stay closed and the sport fishermen need to keep their lines out of the water for the next 15 years to see this stock recover, then so be it. That can happen perfectly well under the current KSMP, and restrictions can be relaxed equitably as determined by Management, both Sport and Commercial working together.

206 – Opposed – The cap on the commercial king fishery does seem high, but reducing it to the level proposed is too low. I'm not sure how to come up with a number in our current season of low abundance that is appropriate, but to put a cap on it based on catches from recent years when the commercial season has been restricted or closed more often than it has been fully fished, isn't right. Maybe a cap could be determined using years when all 4 or 5 king periods were fished in their 12-hour entirety. In hopes that stocks someday rebound, a cap as low as this proposal asks for would be unduly burdensome to commercial fisherman. Honestly, I'm opposed to any cap; it doesn't seem like a useful tool at all. There is no cap on Sockeye. Commercial king salmon catches should be limited by time and area and gear as a proportion of the total run, in accord with sustainability, just like other stocks.

207 – Opposed – See comments on 205. Also, rationale in this proposal is circular, and impossible to enact. Limiting commercial harvest to a percentage of combined Sport and Commercial harvest is circular. Also, there is no way to accurately measure the total run in-season in real time. This proposal is fraught with impracticalities.

Additionally, this proposal brings up the issue of sport "harvest". I think this could use reconsideration. The ethic of sport fishermen globally is transitioning to catch-and-release in effort of consciousness to preserve the resource. It may be time to remove the word "harvest" from the plan in relation to sport and guided sport catching.

Also, to correct mis-information, there is no way that with one net per permit and fishing one 12-hour period per week that the ND commercial fishermen could ever "overharvest" king salmon stocks. Our King Salmon Management Plan allows free passage 13 of 14 tides per week. ADF&G once said that our king fishery is "statistically insignificant," harvesting less than 2 percent of the total run to the ND. King salmon command a high price though, so the few we are able to harvest make it worth our time.

208 – Opposed – Again, we negotiated a ND KSMP last cycle that is working. A premise introduced in this proposal, that the ND commercial fishery should be restricted if some marker is triggered in any one of a list of streams, is remarkably inequitable. We don't like it that our king fishery is indexed to a single system, the Deshka, but we had to agree on something and the Deshka seemed like the most

appropriate index to serve as a gauge for the health of the entire ND, as obviously flawed as that is. An "and" clause may be ok – Deshka, *and* Little Su, *and* Susitna Unit 2, *and* . . . – but certainly not "or".

209 – Opposed – See comments on 205.

210 – Opposed – Passage of this proposal would put a traditional family fishery out of business.

The Smiths may be the only 'registered' sites for miles, but that doesn't mean others don't fish nearby. State law does not require site registration so the "vast majority of this statistical area" may be populated with other fish sites. And, if, as the proposer assumes, there is open beach, there is a reason it is open. It may not be fishable or may be very un-lucrative. Traditional fish sites are where they are because over the years these are the places that have proved to be worth fishing. If this family is forced from this traditional location, it will likely mean the end of their business/lifestyle.

The Little Susitna has problems unique to itself that its users need to deal with and fix for the health of the system and its contribution to the salmon stocks of Northen Cook Inlet. See proposal 238 comment. The idea of using this stream that is being damaged by in-river users as a metric by which to determine the fate of the entire ND commercial fishery is ludicrous.

Also, "large and excessive harvests" is mis-leading rhetoric. This language is not factual and intended to sway the mind and emotions of the reader.

211 – In Favor – Contrary to what it seems most sport users believe, the part of the NDSMP which has restricted our gear from 3 nets to 1 net every summer for approximately 20 years now, **has nothing to do with coho.** This part of the plan was established because Susitna River sockeye were once listed by ADF&G as a "stock of yield concern". It was intended to reduce harvest of Susitna River sockeye, which it was successful at doing. In the minds of some people, this annual temporary gear reduction has become the new normal. That is why language like "liberalized" gets used when the Department began to allow the Eastern Subdistrict to use 2 nets per permit during this time period, beginning in 2016.

This proposal is based on sound logic: the stock-of-yield-concern for Susitna River sockeye has been officially removed, therefore this section of the NDSMP should be repealed. At only 2 days of fishing per week, it is already a restricted fishery.

As an alternate solution, if this part of the plan isn't repealed, language should be added to the plan which makes it explicit that the escapement goal referred to in this part of the plan is for Susitna river sockeye (not coho).

212 – Opposed – If this proposal were to pass it would effectively put Northen District commercial fishermen out of business. We cannot remain economically viable if reduced to 1/3 of our gear for the entire season. Many of us have already had to resort to alternative marketing strategies in recent years to value-add in order to make what we do worth it because of declining prices relative to rising costs of everything else but salmon. With even fewer fish to work with most of us would likely be forced to quit.

213 – Opposed – Allowance of only 1 net per permit in August may put some ND set-netters out of business. Many of us have such thin profit margins already that taking away a viable second half of the season may likely make the whole endeavor no longer worth it.

This and other proposers seek "minimization" of our efforts at harvesting coho. This critical point must not be overlooked: Already written in the NDSMP is language which clearly describes how the commercial harvest of coho is minimized. Here it is (emphasis added):

(d) In addition to the provisions specified in (b) and (c) of this section, the department shall manage the Northern District commercial salmon fisheries <u>to minimize the</u>

incidental take of coho salmon stocks bound for the Northern District ***in the following manner:***

(1) additional fishing periods, other than the weekly fishing periods described in 5 AAC 21.320(a)(1), may not be provided when coho salmon are expected to be the most abundant species harvested during that period; additional fishing periods may not be provided based on the abundance of Northern District coho salmon;

(2) after August 15, the department shall limit the harvest of coho salmon in the Northern District by limiting commercial fishing time to the weekly fishing periods described in 5 AAC 21.320(a)(1).

Commercial fishing for two 12 hour periods per week *is* minimized fishing. Every time I tell people about our fishery they respond with amazement: "You only fish 2 days a week???" Yes, that is it.

214 – Opposed – Passage of this proposal would place such a burden on the already-struggling Northern District commercial fishery that many traditional fish-sites would be put out of business.

The "paired restrictive" nature of this proposal is not equitable. It seeks to tie the entire ND setnet fishery to triggers that may occur among multiple discrete locations and user groups – specifically the PU fishery at the Susitna River and the sport fishery at the Little Su. Just because one system doesn't meet a certain threshold is not reasonable grounds to close a fishery which is harvesting fish at a low rate from myriad other streams/systems that are doing fine. Basing restrictions or closures on triggers from one system OR another, OR another… is not reasonable.

This proposal notes that commercial harvests have increased while sport harvests have decreased. To my knowledge, the effort of the ND commercial fleet has remained relatively static in recent years. The number of permits fished in the Northern District has decreased year by year since the 1980s, with some kind of EO restriction or closure almost every season. If we are harvesting more fish, it is likely because there are more fish to be harvested. Our catches are evidence of abundance.

There are many, many streams throughout Northern Cook inlet where salmon spawn, most of which don't see significant sport angling, yet there are a handful of sport fishing hot-spots where numbers are counted. This proposal seeks to make commercial fishermen accountable to that handful of streams. That's not right.

215 – In Favor – If there is a harvestable surplus, fishermen should be given an opportunity to harvest them.

228 – In Favor – I generally support the Department's proposals which are focused on doing what is best for the fish.

229-231 – Neutral – Personal use is important but it must be monitored properly. The only thing I'd like to point out is Mr. Warta's flawed logic in Proposal 230: that if the ND set-netters are fishing 3 nets twice per week, then a concurrent PU fishery on the Susitna River is justified. It must be remembered that ND set-netters are harvesting fish bound for hundreds of different streams, not just the Susitna, and 3 nets twice a week is the standard minimum, not extra time.

238 – In Favor – I've heard of damaging erosion on the Little Su for years ; now Mr. Page has given us a first-hand account. This small river has been over-boated for years and the salmon have paid the price. We MUST protect habitat. In addition to restricting motor size, I would also suggest a day-use permit lottery system to limit the number of boats on the river per day and per summer. We give streams

riparian zone protections, why shouldn't we protect them in this way also? With the population boom in the Valley, unlimited access may cause unlimited damage.

241 – Opposed – Unlimited sport harvest and liberalized methods (allowance of bait) in conjunction with commercial fishing periods may result in over-harvest of the resource and fails to recognize the inherent differences between sport fishing and commercial fishing - one is for *sport*, the other is commercial harvesting. To argue that these two different types of fishing should be regulated the same way is non-sensical. It would be like making the regulations used for feed-lots apply to a family raising a single cow for food. These fisheries serve different purposes and each has its place.

These 'facts' need to be checked. There is one family with 2 permits that fish in the 1 mile area near the mouth of the Little Su – the Smiths. From what I understand, they often neither fish their full compliment of gear nor their full, two 12-hour periods per week due to limited help.

246 – In Favor – Anything to enhance or protect habitat is a big yes in my book.

251 – In Favor – If the Department agrees with NVE's assessment of struggling populations of reds and silvers in the Eklutna River then I support the intent of this proposal, to curtail sport fishing to allow stocks to rebound to healthy levels.

243 and 252 – Opposed – Liberalizing bag/possession limits for sport fishermen on coho salmon may result in damaging over-harvest of the resource. This is a 50% potential harvest increase for an ever-increasing population of potential fishermen.

The "recollection" of the proposer (252) is incorrect and so is the rationale of proposal 243. Making a connection between the sport bag limit reduction and the ND 1 net restriction as a "paired restriction" is a falsehood. The 1 net restriction is based on Susitna Sockeye, not coho – re: my comment on proposal 211.

The size of the Northen District fishing fleet is fairly static, having only gotten smaller since the '80s. On the 30 mile stretch of beach where I and my neighbors fish, generally the same number of nets have been fished in the same places for the past 40 years, with some fluctuation but the trend over time has been downward. During that same time period, the population of the Valley and popularity of sport fishing has grown significantly. It stands to reason that bag limits were reduced to offset the growing number of sport fishermen. Bag limits should be established by volume of fishing effort and resource available.

Increases in ND commercial harvest numbers of coho over the past couple seasons is being used again as rationale for increasing sport opportunity in the limited number of popular sport fishing areas, not recognizing that commercial fishermen harvest from hundreds of different streams. Sport fishermen should seek to enhance their favorite fishing spots instead of blaming others.

In any given year ND set-netters will continue to harvest at a relatively static rate (percentage) of the total return. Generally, when returns are larger, we catch more, and smaller returns yield smaller catches. When returns are small enough that spawning needs are in question, we get restricted along with the sport fishermen. When returns are abundant and sport bag limits are increased, we are not liberalized. We stay minimized at our normal 2 days per week.

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I participate in the commercial and personal use fisheries in Homer, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Steven Roth
[redacted]
Homer, AK

Greetings respected Board Members,

I am writing to you in regards to the recent over escapement of the Kenai river watershed in the past handful of years. To date, I have heard the theory that over escapement will lead to the salmon fry starving to death due to the abundance of nutrition being depleted by large abundances of salmon fry. I haven't seen any evidence fry abundance limited by the abundance of nutrition in the Kenai watershed. Thus, I was skeptical. The theory is sound, but the upper end of the bell curve for the carrying capacity of the Kenai Watershed hasn't been tested until now.

The recent over escapements has historically never been done in consecutive years. Also, the relatively enormous amounts of fry detected in the acoustic surveys for most of those respective years has never been observed to be as large as recently observed.

Of note, is the largest age 0 fry class of 2022 reaching nearly 59 million ever recorded! Then we look at the next years 2023 age 1 fry class and it is nearly 43,000 which is the lowest age 1 fry class ever recorded! They starved.

I am making the case that because of the recent previous and subsequent over-escapement of the Kenai river watershed that the largest fry abundance ever recorded in the Kenai river watersheds history has starved to death as is evidenced in the fry survey.

I asked if there was any anomalies or differences in the acoustic survey that would account for the low fry count of age 1…. NO.

I asked if there were any equipment malfunctions….No

I asked why there wasn't any lengths and weights recorded for age 1 fry… we didn't catch enough for those numbers to be representative of the population.

Let me repeat: They couldn't catch enough age 1 fry in a trawl survey. This is evidence that the methodologies used to count age 1 fry was accurate and the fry weren't there.

The department has stated two reasons for the low number:

1. Over-winter mortality…… I wholly agree. They starved to death.
2. Out migration during spring…… I wholly disagree. The Ratio for out-migration compared to the previous years makes that theory illogical given the 38 years of data we have. Furthermore, If someone would be a proponent of an illogical and improbable idea such as a larger early out-migration, Prudence would dictate that we act to protect the progeny of future salmon populations by acting as though the fry had starved.

I understand the current management policy is to protect the Kings. I have asked where the Kenai Kings spawning beds are? The department has no maps or studies to refer me too. They say that King and Sockeye beds are different in the regards of the speed of the flowing river in their respective beds. One lays in slower water and the other in faster water.

Have we done any studies that show whether or not in the event of a crowded spawning bed due to over-escapement that the Sockeye salmon will spawn in a Kings bed? I think intuitively we know the answer. A million extra competitors digging around and fry starvation are not factors the Kenai King can or should contend with.

Please reduce the amount of sockeye salmon going up the Kenai river system, because the current management plan has not managed for MSY for any user group in the returning years of this brood stock and this management policy will continue to cause run crashes as it already has in 2026 and 2027. I hope I'm wrong, but if we use logic I'm not. This community needs good reasonable leadership, I hope you provide that to the multitudes of people depending on you.

Respectfully, Roy Rudy

Attached is the Fry surveys.

Skilak and Kenai

Year	Fry Age-0	Fry Age-0 Weight (g)	Fry Age-0 Length (mm)	Fry Age-1	Fry Age-1 Weight (g)	Fry Age-1 Length (mm)
1986	22,217,486		55	2,536,536		76
1987	10,182,400			-		
1988	37,071,211			94,089		
1989	13,987,502	1.1	49	11,066,228	2.7	64
1990	24,601,413	1.4	51	782,393	3.8	71
1991	7,126,711	1.8	52	387,674	5.1	75
1992	9,540,536	1.9	55	104,391	6.3	
1993	35,687,389	1.1	47	1,732,650	3.9	72
1994	11,159,398	1.7	52	1,280,854	4.4	72
1995	8,812,895	2.0	55	473,112	5.5	76
1996	5,582,452	2.0	54	368,644	5.0	74
1997	25,316,385	1.1	45	239,582		
1998	21,193,560	0.8	40	2,459,746		
1999	8,330,506	1.1	46	629,011	3.8	69
2000	19,950,396	1.9	54	472,469	5.1	76
2001	22,515,422	1.9	54	520,673	6.8	83
2002	8,748,692	1.2	48	3,342,145	2.8	63
2003	12,753,378	1.6	54	434,723	3.9	73
2004	27,574,335	1.0	45	711,475		
2005	41,836,439	1.3	49	106,971		
2006	29,401,222	1.3	50	7,859,788		
2007	9,189,447	1.3	52	8,945,722	4.0	73
2008	20,217,614	1.7	54	186,842		
2009	10,782,284	2.0	58	688,401		
2010	17,859,888	1.5	53	461,324	6.3	84
2011	11,809,877	2.1	57	3,796,914	5.8	81
2012	23,560,643	1.8	56	5,442,362	6.6	87
2013	9,515,604	1.7	56	2,857,684	4.6	79
2014	16,200,661	1.0	50	1,402,592		
2015	22,171,908	1.1	51	996,399	2.8	71
2016	26,128,228	1.5	55	1,405,944	4.7	80
2017	19,730,476	1.9	59	3,751,208	5.0	81
2018	14,383,343	2.6	63	4,997,740	7.0	89
2019	6,934,650	2.1	61	1,904,854		
2020	52,868,531	1.1	49	111,709	3.4	73
2021	7,063,607	1.9	58	6,628,646	4.3	77
2022	58,947,459	1.7	56	3,930,539	5.4	82
2023	41,484,943	1.3	50	42,932		

Dear Board of Fish,

My name is Revelle Russell. I live in Homer, AK and have been commercial fishing since 1994, participating in numerous fisheries, both state and federal, across the state. One of my first crewing jobs was in the Inlet in 1994. I am a UCI drift permit holder, have my own vessel (well, jointly owned by the State of Alaska) and have fished the Inlet since 2010. My main source of income is the UCI drift fishery and halibut longlining.

My main concerns are with the Kenai Late-Run Sockeye Management Plan and over escapement of the Kenai and the Kasilof as well. The late run Kenai River sockeye escapement should be 600,000 to 800,000. I support Proposals 111,112,113,114, and 115 in some form.
I oppose Proposal 112.

The 1% rule regarding sockeye harvest is ridiculous. Whenever I have explained this rule to salmon fishermen who participate in other fisheries around the state I always receive the same look. One of disbelief and puzzlement. All it does is punish the vessels still engaged in the fishery after August 1st for no good reason. I support proposals 121, 122,123,124,125, and 126.

I also oppose Proposal 143.

Salmon prices for Cook Inlet sockeye were among the highest in the state last year yet participation was at its lowest I have seen. The drift fleet is basically down to 3 processors. I counted 47 UCI drift permits for sale listed by a local broker. This is not a sign of a healthy fishery and not something the State of Alaska should be proud of. The Board of Fish, not the current board, has put over hundred of small businesses out of operation.

I don't believe it is a salmon problem, at least not with sockeye. I believe it's a management problem. I ask the Board to consider this over the next couple of weeks of hearings,
Thank you. Revelle Russell

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I participate in subsistence, commercial, and sport fishing in Cordova, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Justin Ryan
[redacted]
Cordova, Alaska

PC187

110 N. Willow St., STE 127, Kenai, AK 99611
P.O. Box 1425 Kenai, AK 99611
Phone: 907-283-2700 Fax: 907-331-0511

Art Nelson
Board of Fisheries Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak. 99811-5526

Jan 15, 2024

Re: Incorporation of Knowledge in Alaska Board of Fisheries Reports

Director Nelson;

First and foremost, the State of Alaska needs to acknowledge the ruling in the US Supreme Court case of Katie John and adopt the requirements mandated by the ruling. Without adaption of the recommended findings the State of Alaska continues to discriminate against Alaska Natives in their endeavor to preserve their traditions and cultural lifestyle. There are many steps to take before the Board of Fisheries decides to allow traditional knowledge. In the first instance the Board lacks representation of traditional users on the board. Many on the board speak of holding a subsistence preference permit but their primary reason for sitting on the board is their interests lie in commercial, guiding and sports interests. Subsistence use for Alaska Natives is not a casual use but a means to uphold and honor the traditional and customary lifestyle and to provide for their families. These Alaska Natives for the most part do not hold regular jobs because as you are aware meaningful employment in many villages is lacking. There is no monetary economy, there is only a subsistence economy.

Federal agencies are now working to correct the discrimination that exists for Alaska Natives due to the management of Alaska fisheries that heavily favors commercial, sports and guiding interests. We witness this daily when Alaska Native subsistence users are fined for taking more that their allotment which for this scenario averages 25 per person per household while sports fisherman travel home with hundreds of fish due to daily allocation. In your board hearings over the years that I have attended I have yet to witness a subsistence staff person attend a meeting which is usually staffed by the commercial staff of the department of fish and will also enjoy the testimony of sports fisher staff of the department. In this scenario I can only see traditional knowledge being accepted as a footnote to record that the state has accepted these statements for the record but will not have an impact on board members whose interest it is to minimize subsistence use that may affect commercial, guiding, or sports interests.

I have years ago have lost any expectation of the Alaska Board of Fisheries reflecting on subsistence use except to minimize it. I welcome the fact that because of this history the federal government through many departments are working to reverse the damage caused by the Alaska Department of Fish to Alaska Natives and Alaska Native communities. Despite this fact we as Alaska Native Tribal leaders will begin our work to restore the fish habitat with local communities and organizations that are willing to work with us.

Sincerely,

Eric Morrison
Executive Director

SALMON HATCHERIES
FOR ALASKA

February 12th, 2024

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

With Proposal 43 being considered again at this meeting, we think it is important to acknowledge previously submitted public input. This list of public comments serves as a reminder of the overwhelming opposition to Proposal 43 voiced at the Lower Cook Inlet Board of Fisheries meeting. Many on this list highlighted the importance of following regulatory authority, iterative process, and comprehensive planning. Similarly, many shared concerns about conservation, a lack of evidence, and lowering hatchery production levels. Please review this public input before making a final decision on Proposal 43.

Below is a list of previously submitted public comments opposing Proposal 43:

- Baumgart, Hank (PC13)
- Berger, Jeff (PC16)
- Blake, David (PC18)
- Bright, Jared (PC22)
- Brown, Kacey (PC25)
- Burton, James (PC28)
- Corazza, Megan (PC40)
- Corazza, Richard (PC41)
- Corazza, Sonja (PC42)
- Cotten, Gus (PC44)
- Crump, Nick (PC48)
- Day, Edward (PC49)
- Eckley, Andrew (PC63)
- Eckley, Elias (PC64)
- Eckley, Richard (PC65)
- Flora, Mikee (PC77)

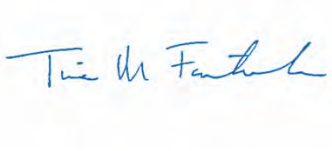
- Grocott, John (PC90)
- Hagen, Camron (PC91)
- Hatch, Arne (PC96)
- Jarvis, Anna (PC109)
- Jenkins, Forest (PC110)
- Johnson, Brent (PC112)
- Johnson, Eli (PC113)
- Jones, David (PC114)
- Jones, Ken (PC115)
- Kimball, Nicole (PC121)
- Kodiak Regional Aquaculture Association (KRAA) (PC124)
- Leese, William (PC127)
- Liddicoat, John (PC131)
- Lindholm, Joe (PC132)
- Lohse, Tyee (PC134)
- Martin, David (PC141)
- Maxwell, Brandon (PC143)
- Maxwell, Matthew (PC144)
- McBride, Barb (PC145)
- Moore, Evenn (PC162)
- Moore, James (PC163)
- Morgan, Kenneth (PC164)
- Nakao, Jenny (PC168)
- Northern Southeast Regional Aquaculture Association (NSRAA) (PC174)
- Nuzzi, Sam (PC175)
- Nuzzi, Tracey (PC176)
- Poirot, Brooke (PC184)
- Poppe, Chad (PC186)
- Prince William Sound Aquaculture Corporation (PWSAC) (PC188)
- Ryan, Justin (PC198)
- Salmon Hatcheries for Alaska (PC200)
- Skeele, John (PC215)
- Smilie, Jason (PC216)
- Smith, Mackenzie (PC217)
- Southern Southeast Regional Aquaculture Association (SSRAA) (PC223)
- Stonorov, Ivan (PC233)

- Stover, Jordan (PC234)
- Thomas, Russell (PC239)
- Towle, Malani (PC241)
- Tueller, Nathan (PC244)
- Tutt, Colten (PC245)
- Valdez Fisheries Development Assoc., Inc. (VFDA) (PC248)
- Van Saun, Roderic (PC250)
- Williams, Shawna (PC267)

Please find attached to this letter RC 61 - Salmon Hatcheries for Alaska PWSAC Response To Fairbanks AC Regarding Proposal 43. Please don't hesitate to contact us with questions or for more information prior to or during the UCI meeting in Anchorage. To contact our group, please email Geoff Clark at geoff.clark@pwsac.com or Rachel Kallander at rachel@kallanderassociates.com.

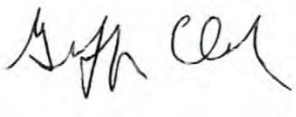
Sincerely,

Dean Day
Executive Director
Cook Inlet Aquaculture Association



Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association

Mike H. Wells
Executive Director
Valdez Fisheries Development Association, Inc.



Geoff Clark
Interim General Manager
Prince William Sound Aquaculture Association

Scott Wagner
General Manager
Northern Southeast Regional Aquaculture Assoc.

Susan Doherty
General Manager
Southern Southeast Regional Aquaculture Assoc.

Re: Response to Fairbanks AC's Submission Regarding Proposal 43 (RC-21)

Board of Fisheries Members:

We appreciate the opportunity to respond formally to the concerns and recommendations raised by the Fairbanks Fish and Game Advisory Committee (Fairbanks AC) in their submission, RC-21, regarding Proposal 43 and other issues. It should be noted that RC-21 is a draft and has not been formally adopted by the AC itself, but was submitted by a member of the AC.

As representatives of the PNP hatcheries, it is essential to address the allegations and arguments put forth by the Fairbanks AC, RC-21, and provide a comprehensive response.

INTRODUCTION

The Fairbanks AC expresses concerns in Proposal 43, primarily related to hatchery pink salmon production reduction and its potential impact on wild salmon stocks. While we respect the Fairbanks AC's dedication to conservation, their submission contains several unfounded claims that require clarification and a more nuanced understanding of the issue.

HATCHERIES AND THEIR ROLE

Alaska's salmon hatcheries play a pivotal role in preserving the state's salmon populations by reducing the directed harvest of wild stocks, supporting diverse user groups, and bolstering local economies. These hatcheries are a testament to sustainable economic development, providing vital income and sustenance for thousands of Alaskans while coexisting harmoniously with wild salmon stocks. They are a critical part of Alaska's rich fishing heritage, promoting the responsible management of our fisheries and ensuring the enduring legacy of salmon for generations to come.

The following sections will address specific allegations or statements made in RC-21.

RESOURCE COMPETITION

The Fairbanks AC's Argument: The Fairbanks AC emphasizes the importance of wild salmon stocks over hatchery-produced salmon and raises concerns about resource competition in the North Pacific.

Salmon Hatcheries for Alaska Response: We acknowledge the importance of wild salmon stocks in Alaska’s history and that they must be protected. Hatcheries can and do play a crucial role in supporting the overall health of wild salmon populations. They have successfully coexisted with wild stocks for decades, throughout which time, Alaskans have witnessed dozens of record wild stock return years. Alaska's hatchery program is designed to supplement wild

stock harvest, not replace them. This mission is clearly stated throughout the Department's literature on hatchery programs.

Alleging that Alaska hatchery pinks are impacting other salmon populations to the extent that is alleged is not supported by the data. The PNP hatcheries in Alaska know the importance of carrying capacity and competition; this topic is discussed frequently with research colleagues and among the PNPs. ADF&G also considers this concern in the determination of requests for changes to permitted egg capacity.

According to research estimates, hatchery-produced pink salmon (from all countries) represent 15% of total pink salmon biomass in the North Pacific. Alaska hatchery-produced pink salmon make up 10% of total pink salmon biomass. Alaska hatchery-produced pink salmon make up less than 1% of total nektonic biomass in the North Pacific according to the research estimates cited in the Ruggerone and Irvine (2018) publication, which references data from the years of 1990-2015.

Definition of Nekton: The collection of marine and freshwater organisms that can swim freely and are generally independent of currents, ranging in size from microscopic organisms to whales.

With regard to competition in the ocean, please see RC-45 submitted by Valdez Fisheries Devleopment Association. RC-45 is an excerpt of a larger paper on high ocean biomass of salmon and ocean trends.

As the board members are well aware, topics such as ocean biomass involve a significant amount of data, research, and scientific analysis. This topic is covered in many publications that contain a diverse array of scientific conclusions and evidence. It is important to take that diversity into account and consider publications of many conclusions when it comes to a topic as large as ocean biomass and North Pacific salmon.

Please find below references to a number of journal articles that provide a narrative on ocean productivity that does not include competition with pink salmon as a primary driver. The references below include a brief overview of each article's focus with the citation reference. We will provide the full publication copies to the board members prior to the Kodiak Board of Fisheries meeting in January 2024.

- An in-depth look at phytoplankton, including diatoms, and zooplankton abundance, biomass, and control during recent cold years (2008-2010) in the eastern Bering Sea did not mention top-down control of pink salmon on plankton (Baumann et al. 2014).
- Juvenile salmon, including pink salmon, were not creating a top-down zooplankton resource bottle neck in the Gulf of Alaska (Daly et al. 2019)
- Temperature and ice retreat timing, bottom up forces, drive the Bering Sea marine ecosystems (Hunt and Stabeno 2002).

- Oscillating control hypothesis; zooplankton blooms are tied to water temperature, and bloom timing related to late (ice-associated) and early ice retreat (Hunt and Stabeno 2002).
- During recent anomalously warm conditions, when top-down pressures are thought to have controlled forage fish abundance in the northern Gulf of Alaska, salmon were not the suspected predators (Arimitsu et al. 2021).

POTENTIAL IMPACT OF PROPOSAL 43

Fairbanks AC's Argument: The Fairbanks AC expresses concerns about the potential consequences of Proposal 43, including job loss and reduced revenue.

Salmon Hatcheries for Alaska Response: While we share concerns about the economic impact, the Fairbanks AC is grossly underestimating the broader consequences of Proposal 43. Proposal 43 threatens jobs and jeopardizes the stability of coastal communities from Ketchikan to Kodiak and the livelihoods of thousands of Alaskans who depend on hatcheries for food in their freezer to operating a small business. This applies to all user groups, especially those of personal use and sport fishermen who testified before the Board this week in Homer at the Lower Cook Inlet meeting.

SCIENTIFIC RESEARCH SUPPORTING CONCERNS

Fairbanks AC's Argument: The Fairbanks AC references peer-reviewed research indicating the increase in pink salmon production and its potential impact on wild stocks.

Salmon Hatcheries for Alaska Response: We acknowledge the importance of scientific research in informing policy decisions. That is the exact process the State of Alaska implemented for the PNP hatcheries when they were first established. Furthermore, this is the driving force behind the Alaska Hatchery Research Project, which focuses on Alaskan Hatcheries and their potential impacts. ADF&G has evaluated new data, collected reports from all PNPs, reviewed permits, and more. This process is thorough and also includes the public. However, there is diverse research on this topic, and not all studies reach the same conclusions. The Department of Fish and Game has not found compelling evidence to support the proposed reduction in hatchery production. The Department provided lengthy commentary on Proposal 43 in their staff comments. See page 103 of RC-2.

COMPREHENSIVE ASSESSMENT

Fairbanks AC's Argument: The Fairbanks AC argues that a comprehensive assessment of Alaska's hatchery program is necessary and implies that the evaluation is lacking or does not exist in all instances.

Salmon Hatcheries for Alaska Response: We support comprehensive assessments to ensure the responsible management of hatcheries and annual evaluations, and year-long cooperation with the Department is already well established. Hatcheries are overseen and reviewed by ADF&G which conducts these assessments based on data and scientific rigor. We agree that involving all stakeholders in this process is essential, including those who depend on hatcheries for their livelihoods and harvests. This is precisely what happens through evaluating program contributions within the diversity of aquaculture boards and the public regional planning team (RPT) process. The process includes comprehensive salmon updates, PRT review, and stakeholder engagement.

BOARD OF FISHERIES INVOLVEMENT

Fairbanks AC's Argument: The Fairbanks AC emphasizes the role of the Board of Fisheries in addressing hatchery-related issues.

Salmon Hatcheries for Alaska Response: We agree that the Board of Fisheries plays an important role. However, we recognize that previous decisions to defer hatchery-related action to the ADF&G Commissioner have been proper and highlight the need for a more thorough review. We encourage the Board to address these issues with an open and inclusive approach within the existing regulatory structure and in clear communication with ADF&G. We also welcome all opportunities to tour board members through any hatchery location.

CONSERVATION AND REFERENCES TO THE 2000 AGREEMENT

Fairbanks AC's Argument: The Fairbanks AC suggests that Proposal 43 is rooted in conservation efforts and holding hatcheries accountable to an agreement set between the state and the hatcheries in 2000.

Salmon Hatcheries for Alaska Response: Conservation is a shared goal, and we all want to ensure the health of wild salmon stocks. However, the inferences to the 2000 agreement are vague and conflict with statements made on the record by ADF&G. Please see RC-39 submitted by Steve Reifenstuhl who was present at the board of fish meeting in 2000, upon which the Fairbanks AC predicates their argument. In short, RC-39 states: “No agreement was signed or otherwise agreed upon to cut pink and/or chum production by 25% or any other

amount. Some people wanted that outcome, but it was not the result. Repeating something that is incorrect over and over is a strategy, not the fact-based reality at the 2000 BOF meeting."

CONCLUSION

A comprehensive and balanced approach, rooted in verifiable scientific principles and data, is necessary to review or evaluate Alaska's salmon hatcheries. We call upon the Board of Fisheries to consider the long-term sustainability of salmon runs, the impact on local economies, and the potential consequences of Proposal 43.

We are committed to collaborative efforts that benefit all Alaskans and ensure the responsible management of our fisheries. We look forward to continued discussions and working together to protect the legacy of Alaska's fisheries heritage. The PNP hatchery associations are standing by to work closely with board members and the Department to ensure transparent, effective, and thoughtful processes and dialogue can occur now and long into the future.

Submitted by Salmon Hatcheries for Alaska leaders present at the Homer Board of Fisheries meeting: Tina Fairbanks of KRAA, Mike Wells of VFDA, and Geoff Clark of PWSAC.

Comments on Proposal 239
By Gene J Sandone
[redacted]

Comments on Proposal 239
By Gene J Sandone
[redacted]

Proposal 239
Establish a large king salmon escapement goal for the Little Susitna River.

I am in support of Proposal 239, as Amended by the Matanuska Advisory Committee, as follows:

Proposal 239: Establish a large king salmon escapement goal for the Little Susitna River.

- Amendment 1: **Prohibit retention of king salmon less than 20 inches when fishery is closed; allow retention of king salmon less than 20 inches when catch and release fishing for king salmon is allowed.**
- Amendment 2: **Establish Large king salmon escapement goals for the Deshka & Little Su Rivers.**

I specifically support Amendment 2 because of the low escapement in recent years and the apparent increasing number of very young king salmon, age-3 and age-4. Although an incomplete count, the 2023 king salmon escapement to the Little Susitna River of 796 king salmon was 62% below the low end of the Sustainable Escapement Goal (SEG) of 2,100 king salmon. Similarly, the 2023 Deshka River king salmon escapement of 3,741 king salmon was 58% below the SEG of 9,000 king salmon (Table 239-1). To make matters worse, 76% of the Deshka River escapement was composed of the very young king salmon, age-3 fish and age-4 salmon. No age-6 king salmon were sampled at the weir in 2023 and, accordingly, no age-6 salmon were included in the age-class composition analysis (Table 239-1).

At the Deshka and Little Susitna rivers weir, ADF&G sexes king salmon using external characteristics. It is very difficult to accurately determine the sex of king salmon through external characteristics, especially during the early portion of the salmon migration. Published reports (John Carlos Garza et al., 2022) and unpublished data (Yukon king salmon fecundity study) report a sex determination error rate, when using external sex characteristics, of 30% and 32%, respectively. Although ADF&G estimates that the female component of the 2023 Deshka River king salmon escapement was 44.9% (Table 239-1), I respectfully question that estimate.

Comments on Proposal 239
By Gene J Sandone
[redacted]

Table 239-1. Deshka River age, sex, and length composition of samples taken at the weir, expanded for the weir passage estimate, 2023. Data from ADF&G.

ADF&G Deshka Weir Chinook Age, sex and length, 2023									
	age_lab	Sample size	Proportion (SE)	Number of females sampled	Female Prop.[a]	Weir Passage Est.(SE)	Mean Length (in)	Range (in)	
3	1.1	118	0.383 (0.028)	9	0.076	1,432 (105)	20.7	17.3	26
4	1.2	106	0.377 (0.029)	69	0.651	1,409 (107)	27.5	20.5	31.7
5	1.3	70	0.241 (0.025)	48	0.686	900 (93)	29.8	27.2	37.8
	All age	294	1.000 (0)	126	0.429	3,741 (0)	25.4	17.3	37.8

[a] Calculated from data provided by ADF&G. Estimates of the female proportion may vary slightly from ADF&G' values.

From my experience as a fisheries research biologist, the sex composition of king salmon age classes varies from 0% females in true jack king salmon, age-3, to between 60% to 70% female age-6 king salmon. I have observed that there are extremely few, if any female king salmon that are age-3, 10%, or less are age-4, and although males usually outnumber females in age-5 king salmon age class, the difference between the sex composition is usually small. Age-6 is usually dominated by females. Although the annual runs may vary as to age- and sex- composition, the brood year return composition has been fairly stable. It may be changing because of poor ocean conditions.

I want to qualify my statements because most of my experience is from king salmon stocks in the Arctic-Yukon-Kuskokwim Region and the sex composition by age may be different in more southerly stocks. But the apparent discrepancy needs some attention.

Using those sex composition data from my experiences, I constructed Table 239-2.

Comments on Proposal 239
By Gene J Sandone
[redacted]

Table 239-2. Deshka River king salmon estimated escapement statistics, female component when using assumed sex composition of age classes, and comparisons of the proportion between the two female composition estimates based on the assumed associated number of females that the low end of the SEG should contain, 2023[a].

		Number	Prop of	Prop below
1	Low end of the Deshka River king salmon SEG	9,000		
2	The ADFG 2023 estimated number of king salmon passing through the weir.	3,741		
3	The 2023 estimated king salmon weir passase as a prop of low end of the SEG:		0.416	0.584
4	ADF&G estimated number/prop of female king salmon in the 2023 weir passage	1,680	0.449	
5	Assume a necessary 1/3 female component in the escapement			
	a. Number of females associated with the low end of the SEG	3,000		
	b. Estimate prop of the female king salmon based on the assumed associated number of females needed to achieve the low end of the SEG, 5.		0.560	0.440
6	Assume: age-3 has 0% females, age-4 has 10% female; and age-5 has 50% female.			
	a. Estimated number/prop of females in the 2023 Deshka River escapement	585	0.156	
	b. Estimated number of females as a proportion of 5a.		0.195	0.805

[a] Data contained in number 1, 2, and 4 are from ADF&G. Estimates in 3, are calculated from ADF&G data. Estimates in 5a and 6 are an assumption from experience. 5b is calculated from ADF&G data divided by 5a. 6a, and 6b are calculated values from assumptions.

My analysis indicates that the poor king salmon escapement to the Deshka River may be much worse than it seems. Based on ADF&G data, the 2023 escapement to the Deshka River was 58.4% below the low end of the established SEG. Additionally, based on ADF&G data, female kings numbered 1,680, which accounted for 44.9% of the escapement (Table 239-2, 4). However, the number of female king salmon in the escapement may be as low as 585 salmon and account for only 15.6% of the escapement (Table 239-2, 6a). Additionally, based on the assumption that female king salmon should account for at least a third of the low end of the SEG (Table 239-2 5a), the 2023 female king salmon escapement, based on my estimate of female composition of the age classes, indicates that the female component of the Deshka River escapement may be 80.5% below that female threshold number (Table 239-26b). In other words, the Deshka River escapement may only contains 19.5% of the female SEG threshold. If this is true, we have a severe problem with the king salmon escapement in the Deshka River, probably the Little Susitna River, and quite possible throughout the entire Northern Cook Inlet Management Area (NCIMA). Comparatively, using ADF&G's estimate of the female component, it would be 44.0% below that female threshold. However, it could be much worse if ADF&G believes that the female component of the SEG should be more than 33.3% female.

Escapement goals are based on many years of data. In most cases, the escapement goals are based on, and expressed, in numbers of king salmon, all king salmon. Changes in the age class composition of the run may indeed point to a shift in the age and sex composition of the brood year return. This shift toward a higher proportion of age-3 and age-4 king salmon, which I

believe are primarily male fish, is at the least, troubling. If this is true, the standard way of doing business in developing escapement goals will have to change. The reproductive capacity of the king salmon resource lies solely in female king salmon, specifically the eggs. The present king salmon escapement goals in the (NCIMA) may rely too much on numbers of salmon and may not adequately address the quality of the escapement, or the percent females in the run. Because sexing king salmon early in their migration is error-prone, it is my belief that a large king salmon escapement goal is necessary to address these changes. Simply put, a large king salmon escapement goal is a surrogate for a female goal. This is true because the older king salmon age classes comprise substantially more and larger female salmon. Accordingly, I believe that the escapement should be assessed as the number of age-5 and older king salmon. There is extremely very little reproductive capacity in age-3 and age-4 king salmon since there are few females in these age classes and because of their small size, the fecundity is very low. The few female king salmon in these age classes would not substantially add to the reproductive capacity of the stock.

From my experience as a fisherman, fishing the Little Susitna River this year, I suspect that the 2023 age class composition of the Little Susitna River king salmon escapement may be very similar to the 2023 Deshka River king escapement. Therefore, I believe that a large king salmon escapement goal is appropriate for both rivers and any other river that monitors king salmon through a weir in the NCIMA.

Accordingly, I propose that ADF&G establish a large king salmon goal in the Little Susitna and Deshka River to be used as an index for all spawning streams within the NCIMA. Because the range in size of the age-5 component of the 2023 Deshka River king salmon escapement is approximately 27 to 38 inches (Table 239-1), I additionally propose that the large king salmon standard is set at a minimum 28 inches (or 700 mm). This would encompass most age-5 and older king salmon and include the largest age-4 king salmon. In this way, we would be setting an escapement goal that sets a higher standard for the quality of the escapement instead of diluting the quality of the escapement with the very large number of young, primarily male king salmon that we have observed in recent years.

I believe that ADF&G has the data, tools, and expertise to develop such an escapement goal and to use this goal as an inseason indicator of king salmon run strength. Problems associated with the in-season management for a large king salmon goal can be addressed. I have some ideas.

Literature Cited

John Carlos Garza , Eric C. Anderson, Kerry Reid, Peter Westley, and Eric P. Palkovacs. 2022. Genomics of maturation age in Yukon Chinook. Arctic-Yukon-Kuskokwim Sustainable Salmon Initiative Project Final Product

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the commercial, sport, and personal use fisheries, as well as seafood processing, in Wrangell, Alaska.

I am a commercial fisherman. I earn a good portion of my catch from hatcheries. This in turn goes back to my crew, the community and all the people involved. It is a valuable resource for me in the beginning of the season, throughout the season, and at the end, when there isn't much wild stock salmon available. Hatcheries are crucial in reducing pressure on wild salmon stocks, especially during years of lower abundance. This coming year should be a lesser year with poor prices. Hatcheries will help me and the community pay our bills.

Sincerely,
Amy Schaub
[redacted]@[redacted]
Wrangell, Alaska

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a long-time resident of the Matanuska Susitna Valley who has enjoyed fishing the Southcentral fisheries since I moved to Alaska as a young kid. The ability for my family to have fresh fish on our table and in our freezer has been a staple of our livelihood and a passion we enjoy together so I hope the opportunity continues to be there as my daughters grow up.

I support Proposal 112 to increase the Kenai sockeye salmon in-river goals. Large escapements over the last 20 years continue to produce average to large returns of sockeye salmon in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for the future.

I support Proposal 90 to increase the commercial fishing closure “window” from 36 hours to 48 hours . Commercial fishing near the mouth of the Kasilof and Kenai Rivers nearly blocks fish to enter the river and takes away opportunity from the personal-use fishery. This commercial closure increases escapement and opportunity for Alaskan residents to harvest sockeye salmon.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, means and methods, and other privileges of the commercial fishery to protect weaker salmon stocks, such as late-run Kenai chinook salmon and Susitna sockeye salmon.

I support Proposal 106 to change the mesh depth gillnetters use to target sockeye salmon. Available evidence proves shallow gillnets reduce chinook salmon harvest; therefore, this change is necessary to protect chinook salmon.

Large commercial sockeye salmon harvests come at the expense of other species and stocks in Cook Inlet. Cook Inlet (and Alaska as a whole) must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Thanks for the consideration of my comments on these proposals. I greatly appreciate the Board of Fish for taking actions in 2020 to protect late-run Kenai chinook salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds. Now is not the time to expand commercial fishing or lower escapement goals.

Sincerely,

Chad Schierman
Wasilla, AK

Submitted by: Mike Schierman
Community of Residence: Wasilla, Alaska

I Support: Proposals 1, 2,3,4,43,82,90,100,112,114,135-37,141,143,146,150,161,163,164,166,167,173,176,183-189,195,202,208,210,214,221,228,230,234-237,239,241,243,244,246-250,252

I Oppose : Proposals 81,89,91,97,100,103,157,158,169,172,174,180,181,211,232,238,252

Proposal 1: Support With Amendments Proposal 2: Support Proposal 3: Support
Proposal 4: Support Proposal 43: Support Proposal 81: Oppose Proposal 82: Support
Proposal 89: Oppose Proposal 90: Support Proposal 91: Oppose Proposal 97: Oppose
Proposal 100: Oppose Proposal 103: Oppose Proposal 106: Support Proposal 112: Support
Proposal 114: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support
Proposal 141: Support Proposal 143: Support Proposal 146: Support Proposal 150: Support
Proposal 157: Oppose Proposal 158: Oppose Proposal 161: Support Proposal 163: Support
Proposal 164: Support Proposal 166: Support Proposal 167: Support Proposal 169: Oppose
Proposal 172: Oppose Proposal 173: Support Proposal 174: Oppose Proposal 176: Support
Proposal 180: Oppose Proposal 181: Oppose Proposal 183: Support Proposal 184: Support
Proposal 185: Support Proposal 186: Support Proposal 187: Support Proposal 188: Support
Proposal 189: Support Proposal 195: Support Proposal 202:Support Proposal 208: Support
Proposal 210: Support Proposal 211: Oppose Proposal 214: Support Proposal 221: Support
Proposal 228: Support Proposal 230: Support Proposal 232: Oppose Proposal 234: Support
Proposal 235: Support Proposal 236: Support Proposal 237: Support Proposal 238: Oppose
Proposal 239: Support Proposal 241: Support Proposal 243: Support Proposal 244: Support
Proposal 246: Support Proposal 247: Support Proposal 248: Support Proposal 249: Support
Proposal 250: Support Proposal 251: Oppose Proposal 252: Support

PC193

Submitted by: Luke Schultz
Community of Residence: Cora, Wyoming

While I understand the pressures that come with trying to maintain the sockeye net fishery in the Kenai, lowering the current OEG for late-run king salmon in order to allow/justify commercial fishing and netting in the inlet is entirely unacceptable and should not be considered. I ask you to consider the proposal 83 that suggests a conservative start to the fishery and then liberalizing the season as escapement goals are met. Many other potential solutions could, and should, be considered, but this is the one I am most familiar with.

Proposal 83: Support

PC194

Submitted by: James Scott
Community of Residence: Anchorage, AK

Hey y'all. Heard there's a chance ADFG might consider reducing the overall escapement goal for Kenai River Kings. Please protect our King fishery. Do not reduce the escapement goal. We must control what we can control and build this fishery back toward what it once was. Thank you for helping keep all of our best interests in mind.

PC195

Submitted by: Brian Scow
Community of Residence: Kenai Alaska

The Board of fisheries closed the east side set net fisheries in 2023 due to not meeting the king escapement goals kings are in decline state wide we had zero opportunity to fish the 600 ft rule already in place could have been used instead we were closed all other user groups still fished and with 24 hour dip netting up to 12 a day sport fishing that looks like discrimination the state constitution of Alaska says you can not reallocate fish stocks from one user group to another by way of vote this is exactly what the board of fisheries is doing when the vote on goals that are unattainable at the very least let us commercial dip net when we can not use our nets maybe it's time to have NOOA manage our fishery at least we might get fishing time anyone of the board of fisheries members are welcome to come and vist my East side set net site so I can provide proof of allmost no kings caught in the beach nets 600 ft from the mean high tide half the day the nets are dry kings do not like to swim shallow or when lots of sockeye are are running to the Kenai River why are you taking one away one of the most effective tools the state of Alaska Biologists have to stop the over escaping 2.4 million sockeye in the Kenai river as a matter of fact the pink salmon are already paying the price of over escaping the river 2022 no pinks as before at Eagle rock every one in town I talk to said the same thing even the biologist agreed

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Submitted by: Nancy Scow
scow fishing llc

Community of Residence: Kenai Alaska

Please find a way to let the East side set net fishery fish after we were closed in 2023 not because there was over escaping sockeye salmon but because of the goal of 15000 kings which has not been achieved in the past 5 years or more this is not realistic king salmon are in decline state wide there are plenty of sockeye salmon for all fisheries ask the state of Alaska Biologists tell you when you keep over escaping the river year after year take away the only effective tool at his disposal the 600 ft beach net from mean high tide to stop the over escaping sockeye lost revenue destroying the Kenai peninsula economy and commercial fishing and much needed local summer jobs for local kids also processing plants will close after any more closures to our fishery

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Support
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Support	Proposal 81: Support
Proposal 82: Oppose	Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Support
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 106: Oppose	Proposal 107: Oppose	Proposal 108: Oppose	Proposal 109: Oppose
Proposal 110: Support	Proposal 111: Oppose	Proposal 112: Oppose	Proposal 113: Oppose
Proposal 114: Support	Proposal 115: Oppose	Proposal 116: Support	Proposal 117: Support
Proposal 118: Oppose	Proposal 119: Support	Proposal 120: Support	Proposal 121: Oppose
Proposal 122: Oppose	Proposal 123: Oppose	Proposal 124: Oppose	Proposal 125: Oppose
Proposal 126: Oppose	Proposal 127: Oppose	Proposal 128: Support	Proposal 129: Oppose
Proposal 130: Support	Proposal 131: Oppose	Proposal 132: Oppose	Proposal 133: Support
Proposal 134: Oppose	Proposal 135: Oppose	Proposal 136: Oppose	Proposal 137: Oppose
Proposal 138: Oppose	Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Oppose
Proposal 142: Oppose	Proposal 143: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Oppose	Proposal 164: Support	Proposal 165: Oppose
Proposal 166: Oppose	Proposal 167: Oppose	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 175: Oppose	Proposal 176: Support	Proposal 177: Support
Proposal 178: Support	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 182: Oppose	Proposal 183: Oppose	Proposal 184: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 187: Oppose	Proposal 188: Oppose	Proposal 189: Support
Proposal 190: Support	Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose
Proposal 194: Oppose	Proposal 195: Support	Proposal 196: Support	Proposal 197: Support
Proposal 198: Support	Proposal 199: Support	Proposal 200: Support	Proposal 201: Oppose
Proposal 202:Oppose	Proposal 203: Oppose	Proposal 204: Oppose	Proposal 205: Oppose
Proposal 206: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose

Proposal 214: Oppose	Proposal 215: Support	Proposal 216: Oppose	Proposal 217: Oppose
Proposal 218: Oppose	Proposal 219: Oppose	Proposal 220: Oppose	Proposal 221: Oppose
Proposal 222: Oppose	Proposal 223: Oppose	Proposal 224: Oppose	Proposal 225: Oppose
Proposal 226: Oppose	Proposal 227: Oppose	Proposal 228: Oppose	Proposal 229: Oppose
Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose	Proposal 233: Oppose
Proposal 234: Oppose	Proposal 235: Oppose	Proposal 236: Oppose	Proposal 237: Oppose
Proposal 238: Oppose	Proposal 239: Oppose	Proposal 240: Oppose	Proposal 241: Oppose
Proposal 242: Oppose	Proposal 243: Oppose	Proposal 244: Oppose	Proposal 245: Oppose
Proposal 246: Oppose	Proposal 247: Oppose	Proposal 248: Oppose	Proposal 249: Oppose
Proposal 250: Oppose	Proposal 251: Oppose	Proposal 252: Oppose	Proposal 253: Oppose
Proposal 254: Oppose	Proposal 255: Oppose		

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman from Valdez. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

Sincerely,
Andrew Scudder
[redacted]@[redacted]
Valdez, Alaska

Submitted by: Ryhan Sempler
Community of Residence: Missoula, Montana

As a Montana resident who doesn't have sea run salmonids, I spend a lot of time and dollars in your state to fish for kings on the Kenia river system. I urge you to not lower the OEG and wait until the Kenia has good numbers of king salmon to spawn. I support proposal 83. You have a great state and don't waste it.

Proposal 83: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a life long resident born in Anchorage and I sportfish, commerical fish and sometimes dip net on the kasilof river. I believe the burden of conservation should be shared equally and that has not been the case the last few years as setnetters have been completely shut out of the fishery.

It is NOT true that large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. There are plenty of fish for everyone and the "conservation" efforts have already been place at the feet of the commerical fisheries. The Inlet must be managed to share the burden of conservation among all user groups including In river commercial guides, and dipnetters.

I do not support increasing the commercial fishing closure “window” from 36 hours to 48 hours to cause more over escapement. Proposal 90 is just another attempt to close down commercial fishing and is a horrible management decision considering the fish do not know when it is Friday morning to Sunday morning.

Large escapements are actually holding back larger runs of fish in both rivers if you look at historical run sizes, especailly in the 80's and 90's. Proposal 112 is another attempt to close commercial fishing and should not even be considered a legitimate proposal.

The actions taken by the board in 2020 have been disastrous causing massive economic waste and over escapement in both the kenai and kasilof rivers. The conservation burden is not being shared equally as all other user groups continue to fish and kill king salmon, while setnetters have been kicked completely out of the state fishery.

Sincerely,

Philip Sheridan
SOLDOTNA, AK

I have read the proposals. Most seem to be written by commercial fishers either set or drift net. The most interesting is 88. Which would like to limit the guides and non-resident fishing somewhat. There are way too many guides on the river. I do believe it is detrimental to the king population to have a boat going right over them full speed every 5 minutes or so. It is annoying to me and I'm just fishing, not trying to reproduce. I spend a lot of time on the Kenai in the summer. The lack of kings is disturbing. What is more disturbing is the lack of anyone willing to sacrifice anything to help try to get the population back. I have not been able to fish for kings on the Kenai for years and I live here.

The Problem as I see it is the commercial fishing. Last year we could not even fish the inlet let alone the river and the numbers are still awful. Awful everywhere. They keep saying it is unknown ocean conditions. I doubt that. The commercial drift nets just kept getting emergency order after emergency order for range closer to shore, longer days, extra days and longer season. Just netting every fish they could. Heaven forbid they let anything in to the river. Meanwhile the king population plummets. You could track on the counter the days the commercial guys were out and within a half mile from shore. The number of kings coming went down those days. You think that is a coincidence?

I don't think the OEG or SEG should be lowered it is not unachievable or unrealistic. It will and can happen if we regulate the commercial fishing properly. We should stick to the hours for their season. 36 to 48 hours a week and that is it. 1 to 1.5 miles from shore. No emergency orders for a half-mile and no extra days. Just have a normal season. We should also limit the number of commercial boats allowed to fish the inlet. For example they can fish Monday through Thursday, there are 200 boats. Boats 1-100 fish week one Monday and Wednesday week 2 they fish Tuesday and Thursday. Opposite for boats 101-200.

Set nets should be limited too. Either shorter, shallower or less nets per operation. This business about "Over Escapement" is garbage. No one was regulating the run before man decided to and the river was thriving. You can't have "too many" fish in the system more fish make for a healthier ecosystem period.

I don't think limiting bait the first half of August is doing anything for the population. I have never hooked a King while sitting on eggs, ever.

I have come to terms with the fact I won't be able to fish for kings, on the Kenai, any time soon. I am hopeful I will be able to again in a few years. I hope you guys are really taking this seriously this year and are willing to stand up to commercial fishing.

You could always give up on the native salmon population and start stocking the river but no one wants that.

I have been to the meetings you have in Anchorage. The commercial guys are for the most part flown up from Seattle. They show up late, smelling like booze, read their prepared statements and leave as soon as they are done. It is obvious they don't care about Alaska and its fisheries. They just want all the fish until there is no more to take. Just like they did to Puget Sound. The meetings are so jammed with them the sport fishermen rarely get to read statements.

Sincerely,

Jeffrey Sherman

Submitted by: Jason Simmons
Community of Residence: Cooper Landing Alaska

Proposal Number 167.

This proposal is to stop the Guides and Public of using baited hooks for catching Salmon and Trout. We as trout guides believe that this is killing off the trout population on Middle and lower Kenai River.

There are other ways to catch Salmon with un baited hooks. Please take this in consideration for the Trout the Guides to save the fishery instead of destroying it.

Proposal 167: Support

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I commercial and sport fish in Seward, Alaska. I work with salmon and directly employ 42 individuals who make their primary living off these fish. These fish are a vital resource for our coastal communities.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Kristen Smith
[redacted]@[redacted]
Seward, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, sport, and commercial fisheries in Cordova, Alaska. As a commercial fisherman, and former hatchery worker for quite a few years, I feel I have a full circle view of just how large the hatcheries impact is on helping keep our fisheries sustainable.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Mackenzie Smith
[redacted]@[redacted]
Cordova, Alaska

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am a young commercial fisherman participating in the PWS seine fishery for the last 8 years. I am interested in buying into this salmon fishery, and I support the sustainable use and management of our hatchery and wild salmon runs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Carter Snow
[redacted]@[redacted]
Homer, Alaska

Southeast Alaska Fishermen's Alliance

PC205

1008 Fish Creek Rd
Juneau, AK 99801

Email: [redacted]

Cell Phone: [redacted]

Fax: 907-917-5470 Website: http://www.seafa.org

February 5, 2024

Alaska Dept of Fish & Game
Board of Fisheries
John Wood, Chair
1255 W 8th Street
PO Box 115526
Juneau, AK 99811

Submitted via web portal

RE: Oppose proposal #43

Chairman John Wood and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is multi-gear, multi-species commercial fishing association representing our 300+ members involved in salmon, crab, shrimp and longline fisheries mainly in Southeast Alaska. SEAFA opposes proposal #43 that was heard at the lower Cook Inlet meeting and again at this Upper Cook Inlet Meeting.

PROPOSAL #43: Basic Management Plans – Oppose

SEAFA opposes Proposal #43 to undermine the Cook Inlet Hatchery production putting the organization at risk, economically and broodstock production wise and setting a precedent that would affect all hatcheries across the state.

A version of this proposal comes before the Board of Fish almost every meeting where a hatchery operates but does not present any compelling evidence for the need to limit hatchery production. ADF&G Staff comments (RC2) from the Lower Cook Inlet meeting has an excerpt from the Dept of Law that points out that the Board of Fish most likely DOES NOT (emphasis added), have the authority (to limit production) but the authority rests with the Commissioner of ADF&G to fundamentally change hatchery production levels or to make changes to hatchery production due to conservation concerns.

Hatcheries are permitted through a robust process involving the public, hatchery operators and ADF&G and a final review and decision by the Commissioner after weighing the public testimony, the Regional Planning Team meeting & resulting recommendations, the ADF&G internal review, and consistency with the regional Comprehensive Plan and Basic management plan.

Hatchery stocks provide an important role in protecting wild stocks by providing an opportunity to fish the enhanced stock and minimizing the effort on wild stocks particularly in those areas that have action plans in place to protect stocks of concern.

Sincerely,

Kathy Hansen
Executive Director

SSRAA
Southern Southeast Regional Aquaculture Association, Inc.
14 Borch Street, Ketchikan, Alaska 99901
P: 907.225.9605 F: 907.225.1348

February 12, 2024

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
[redacted]

RE: Proposal 43 – 5 AAC 40.820. Basic Management Plan

Chairman John Wood, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments for proposals submitted to the Alaska Board of Fisheries (BOF) at the 2024 Upper Cook Inlet Finfish meeting. The Southern Southeast Regional Aquaculture Association (SSRAA) respectfully provides the following comments for the board's consideration **in opposition to Proposal 43.**

Proposal 43 –5 AAC 40.820. Basic Management Plan

SSRAA previously submitted public comments to the Lower Cook Inlet Finfish meeting in proposal 223. Of the on time public comments submitted, five were in favor, 1 supported with amendments but didn't provide any, and more than 80 were opposed to the proposal. The overwhelming opposition to this proposal correctly addresses the fact that this proposal will do nothing to "fix" the depressed returns that these releases are being blamed to have created.

Those opposed to hatchery production in general have been quick to "jump on board" the global synthesis paper by McMillan et al (2023). In her address to House Fisheries on February 6, 2024, Lorna Wilson, PNP Hatchery Program Assistant Coordinator for the Division of Commercial Fisheries, addressed some of the issues with this paper. Of the 206 papers used in this synthesis, 13 were related to Alaska, and 5 related to salmon trends in the North Pacific. Of those 13 papers, 7 found adverse effects, of which more than 50% of those papers used chum and pink from Asian hatcheries. 2 papers found mixed effects, 3 papers did not find adverse effects, and one was consider as having no effect. The 5 papers considered to have adverse effects were from the North Pacific where hatchery releases are predominantly from rivers and lakes (referred to as putting fish on fish), where Alaska releases are almost exclusively from saltwater releases.

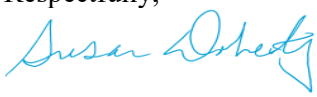
At this same hearing, Doctor Katie Howard, Fisheries Scientist, Salmon Ocean Ecology Program, ADF&G, clarified that hatchery adult and immature pink salmon biomass in the North Pacific, is estimated to be 3.2%, with AK hatcheries making up **2.1%** of the total biomass. Additionally, her presentation included emerging data on pink salmon stock distribution, and changes in plankton quality as a food source in years a warming ocean and sea ice melt. These are examples of compelling information to take into account when wanting a "lever" to solve depressed salmon returns, and will be invaluable in helping officials at all levels make informed decision for Alaska and its residents.

The Commissioner, in 2019 implemented a directive of no increases to pink and chum egg take permits in Alaska. By this action, the Department recognized the needed for a pause to evaluate all the potential positives and negatives of this level of production to the various regions. Please allow the Department to carry out their due diligence in this regard, and keep the decision making with the bodies charged with regional oversight, using the numerous processes created within the enhancement structure.

We humbly ask the BOF to use the best science as a basis for any decision making in this arena, and not respond to emotional pleas that we "need to do something." Not taking action on hatchery production is not the same as doing nothing.

SSRAA would like to thank the Board of Fisheries for the opportunity to provide comment on this proposal, and we would respectfully request that **the board reject Proposals 43, and any other request to reduce hatchery production.**

Respectfully,



General Manager

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska since 1996, and Alaska's fishing opportunities are one of the reasons I love Alaska. I moved from Fairbanks to South Central in 2001, and own property in Kasilof. I miss the days of fishing for kings in the healthy populations of Southcentral. From Willow Creek (where I caught my first King) to the Kenai (where I've caught my largest) these populations have been decimated. One of the main reasons is Cook Inlet sockeye set nets pulling in King Salmon bycatch. For years it seems these nets have hauled in more Kings than have escaped upriver. Now we are paying for the continued allocation of these by catch fish to commercial netting. I fear I may never have a chance to fish with the opportunity of catching a king on the Ninilchik on Memorial Day, or spending a weekend in late June up at the Deshka targeting 2 kings.
It's time for ADFG to start allocating these resources to the people of Alaska, and stop only managing all of SouthCentral for commercial sockeye harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Eric Spade
Eagle River, AK

PC208

Submitted by: John David Stanley III
Community of Residence: Sterling Alaska

Proposal 167

Bait in this section of river has become a detriment to both silver salmon populations and the resident species of the river particularly the rainbow trout. Over the last 13 years of working on the river I've seen first hand the effects of bait have a negative effect on the silver salmon and trout. Finding undesirable silvers (red ones) floating down the river dead after being caught and released because of their color isn't an uncommon sight to see now along with the sheer number of prespawn fish being caught and released on a daily basis has skyrocketed. It has been well documented that catch and release fishing for silver salmon with bait results in a high mortality rate for the fish prior to them spawning. The trophy Rainbow trout that the kenai is known for are also being affected by the increased pressure on them indirectly caused from the increased pressure on the silver salmon. In one week I found 5 trout over 30" dead with bait hooks in their throats. Those are the fish that bring people to the river and they are not easily replaced with our current management plan.

Proposal 167: Support

PC209

Submitted by: Ivan Stonorov
Community of Residence: Homer

To the Alaska Board of Fisheries,

I oppose, the Commercial Finfish Proposals # 43

The hatchery program has been one of the most successful non profit organizations in Alaska. This program has provided a sustainable source of food and employment for thousands of people. The salmon hatcheries have seen the return of many generations of salmon to different regions with continuing robust returns. These returns have secured the livelihood of many fishermen involved in the harvest of those fish. With the harvests of the salmon, the program has provided food security on a national level. Any disruptions to the hatchery production of salmon would have severe consequences to the Alaskan economy, and national food security.

There are many new articles about the negative impacts that hatcheries are having on wild stocks of salmon. I have read many of these articles, some of which have valid points but I have yet to read an article that has any conclusive scientific data that hatchery's are responsible for salmon declines. My response to these articles and others like it, is that the fluctuations in salmon populations depending on the year is a natural cycle. One year there are more salmon in the ocean, not just pink salmon but all species of salmon, and the even year there is more feed in the ocean, zooplankton etc. In my analysis, this is a natural cycle that happens. It is hard to compare large pink salmon returns to sockeye and coho returns because pink salmon spend one year in the ocean and other species of salmon spend one to three years or more in the ocean. Looking at the upper Cook Inlet sockeye return data collected by the Alaska Fish and Game shows that 2023 had a strong Sockeye return that was 27% greater than the preseason forecast. Similarly, Prince William sound had a strong return of pinks in 2021 and 2023. Many of these Cook Inlet fish entered the ocean at the same time as the Prince William Sound fish, both species had healthy ocean conditions and enjoyed a robust return just on different years because due to their biology the different species of salmon spend different amounts of time in the ocean.

Climate change is also a factor in the population changes that we are seeing. Pink salmon, black cod and pollock all seem to be species that are responding well to recent changes in climate. While, other species like cod, king salmon and opilio crab don't seem to be fairing quite as well in the changing environment. According

to Maranda Weiss's article "Too Many Pinks in the Pacific" that was published in Hakai Magazine, hatcheries only represent 15 percent of salmon in the ocean. It seems

unlikely that hatcheries are the cause of larger than normal pink returns, when they only represent 15% of the salmon population. Along with larger than normal pink returns, some of the largest sockeye returns on record have occurred in recent years.That being said, there are some species of salmon that have experienced smaller returns recently. For example Chinook salmon returns have been lagging. There are many environmental and human caused reasons for this, including poor commercial fishing management, sport fishing on the spawning beds, and warmer river conditions. In her article, Weiss also talks about the fact that fish are getting smaller and blames this on a lack of feed. While a lack of feed could be one factor, there also may be other evolutionary factors such as the fact that we have been harvesting salmon with gill nets, for more than half a century. Gill nets allow the smaller fish to pass through while the larger fish get caught, creating a surviving gene pool of physically smaller fish. Not to mention the fact that our in river sport fisheries target large fish leaving the smaller fish to be the spawners.

Hatcheries undoubtedly provide stability in the sport and commercial fisheries throughout the state of Alaska. 28 percent of the total ex-vessel value of Alaska commercial salmon catches is produced by hatcheries. This adds up to be around 150-300 million dollars worth of fish every year. A majority of these profits support local fishing families and go directly back into Alaskan communities. Further, as I travel around the state I witness many sport fishermen and supporting businesses enjoying the benefits of hatchery production. There have been hatcheries operating in Alaska for more than 50 years, producing many generations of salmon. The hatcheries have not changed but the climate is changing. When we talk about hatcheries and their long term impacts, we must pay attention to real scientific data and make educated conclusions.

Ivan Stonorov

Lifelong Alaskan, commercial and sport fisherman.

currently PWS Seiner and avid sport fisherman

Proposal 43: Oppose

Alaska State Legislature

REPRESENTATIVE LOUISE STUTES

Rep.Louise.Stutes@akleg.gov
Kodiak – Cordova – Seward

SESSION ADDRESS
Alaska State Capitol
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February 12, 2024

Alaska Board of Fisheries
PO Box 115526
1255 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing to you as Representative Louise Stutes, a steadfast advocate for the thriving fisheries and coastal communities of our great state. As a representative deeply connected to the diverse needs and aspirations of Alaskans, I am compelled to express my unwavering support for our hatchery programs and the invaluable contributions they make to our fisheries, economies, and ways of life.

Hatcheries have long been the lifeblood of Alaska's fisheries, serving as a beacon of sustainability and prosperity for countless communities across our state. From commercial fishermen to subsistence harvesters, sport anglers to indigenous communities, hatcheries play a vital role in ensuring equitable access to our precious salmon resources while bolstering the economic resilience of coastal regions.

Proposal 43, with its aim to curtail pink salmon production, poses a significant threat to the delicate balance that hatcheries have painstakingly maintained over the years. Such a reduction would not only jeopardize the livelihoods of fishermen and women but also undermine the cultural heritage and traditions of indigenous peoples who rely on salmon for sustenance and cultural continuity.

As a representative entrusted with safeguarding the interests of my constituents, it is imperative that we vehemently oppose measures that undermine the sustainability and integrity of our hatchery programs. Instead, we must advocate for policies that foster collaboration, innovation, and responsible stewardship of our fisheries, ensuring their vitality for generations to come.

I implore the Board of Fisheries to stand with the diverse array of stakeholders who depend on our hatchery programs and reject Proposal 43. Let us unite in our commitment to upholding the resilience and prosperity of Alaska's fisheries and the communities they sustain.

Thank you for your attention to this crucial matter.

Sincerely,

Louise Stutes

Representative Louise Stutes

PC211

Submitted by: Gary Swan
Community of Residence: wasilla, Ak.

All my support or opposition is covered in proposal survey. This process is out of perspective for the average Alaskan to be truely involved. Too many special interests, with paid lobbyists.

Proposal 1: Support	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 121: Oppose	Proposal 122: Oppose	Proposal 123: Oppose
Proposal 124: Oppose	Proposal 125: Oppose	Proposal 126: Oppose	Proposal 127: Oppose
Proposal 128: Oppose	Proposal 129: Oppose	Proposal 130: Oppose	Proposal 131: Support
Proposal 133: Support	Proposal 134: Oppose	Proposal 135: Oppose	Proposal 136: Support
Proposal 137: Oppose	Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Support
Proposal 142: Support	Proposal 143: Oppose	Proposal 144: Oppose	Proposal 145: Oppose
Proposal 204: Oppose	Proposal 205: Oppose	Proposal 206: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 216: Oppose
Proposal 217: Oppose	Proposal 218: Oppose	Proposal 219: Support	Proposal 221: Oppose
Proposal 222: Support	Proposal 223: Oppose	Proposal 224: Oppose	Proposal 225: Oppose
Proposal 226: Oppose	Proposal 227: Oppose	Proposal 228: Support	Proposal 229: Oppose
Proposal 230: Oppose	Proposal 231: Support	Proposal 232: Oppose	Proposal 233: Oppose
Proposal 234: Support	Proposal 235: Oppose	Proposal 236: Support	Proposal 237: Support
Proposal 238: Support	Proposal 239: Oppose	Proposal 240: Oppose	Proposal 241: Oppose
Proposal 242: Support	Proposal 243: Oppose	Proposal 244: Support	Proposal 245: Oppose
Proposal 246: Support	Proposal 247: Support	Proposal 248: Support	Proposal 249: Support
Proposal 250: Oppose	Proposal 251: Support	Proposal 252: Oppose	Proposal 253: Oppose
Proposal 254: Oppose	Proposal 255: Oppose		

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

I am a retired USAF Chief Master Sergeant. The Air Force brought my family to Alaska for a 4.5-year tour. We moved to Alaska permanently in 2009 after retiring from the Air Force. We built our retirement home less than a mile from the Kenai River. We fish the Kenai and Russian rivers with family, friends and neighbors for pleasure and sustenance.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

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The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

David Thiede
Soldotna, AK

Submitted by: Melinda Thorn
Scow fishing LLC

Community of Residence: Kenai Alaska

I don't understand why the Kenai river has over 2 million sockeye salmon escaping in the river and you close the east side set net fishery in 2023 destroying the local economy causing processors to close could have given us beach nets only 600 ft from mean high tide any one of the board of fisheries members are welcome anytime to come to my beach site and and see for yourself the kings do not swim in shallow water our beach nets are a very effective tool to help stop over escaping the river ask your biologist what happened in years past what happens poor returns there is plenty of fish for everyone I am asking the Board of fisheries to vote for the proposals to get us back fishing be fair to everyone and the great state of Alaska and the local economy

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Support	Proposal 81: Support
Proposal 82: Oppose	Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Oppose
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Support
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 106: Oppose	Proposal 107: Oppose	Proposal 108: Oppose	Proposal 109: Oppose
Proposal 110: Support	Proposal 111: Oppose	Proposal 112: Oppose	Proposal 113: Oppose
Proposal 114: Support	Proposal 115: Oppose	Proposal 116: Support	Proposal 117: Support
Proposal 118: Oppose	Proposal 119: Support	Proposal 120: Support	Proposal 121: Oppose
Proposal 122: Oppose	Proposal 123: Oppose	Proposal 124: Oppose	Proposal 125: Oppose
Proposal 126: Oppose	Proposal 127: Oppose	Proposal 128: Support	Proposal 129: Oppose
Proposal 130: Support	Proposal 131: Oppose	Proposal 132: Oppose	Proposal 133: Support
Proposal 134: Oppose	Proposal 135: Oppose	Proposal 136: Oppose	Proposal 137: Oppose
Proposal 138: Oppose	Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Oppose
Proposal 142: Oppose	Proposal 143: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 165: Oppose
Proposal 166: Oppose	Proposal 167: Oppose	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 175: Oppose	Proposal 176: Support	Proposal 177: Support
Proposal 178: Support	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 182: Oppose	Proposal 183: Oppose	Proposal 184: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 187: Oppose	Proposal 188: Oppose	Proposal 189: Support
Proposal 190: Support	Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose
Proposal 194: Oppose	Proposal 195: Support	Proposal 196: Support	Proposal 197: Support
Proposal 198: Support	Proposal 199: Support	Proposal 200: Support	Proposal 201: Oppose
Proposal 202: Oppose	Proposal 203: Oppose	Proposal 204: Oppose	Proposal 205: Oppose
Proposal 206: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose

Proposal 214: Oppose Proposal 215: Support Proposal 216: Oppose Proposal 217: Oppose
Proposal 218: Oppose Proposal 219: Oppose Proposal 220: Oppose Proposal 221: Oppose
Proposal 222: Oppose Proposal 223: Oppose Proposal 224: Oppose Proposal 225: Oppose
Proposal 226: Oppose Proposal 227: Oppose Proposal 228: Oppose Proposal 229: Oppose
Proposal 230: Oppose Proposal 231: Oppose Proposal 232: Oppose Proposal 233: Oppose
Proposal 234: Oppose Proposal 235: Oppose Proposal 236: Oppose Proposal 237: Oppose
Proposal 238: Oppose Proposal 239: Oppose Proposal 240: Oppose Proposal 241: Oppose
Proposal 242: Oppose Proposal 243: Oppose Proposal 244: Oppose Proposal 245: Oppose
Proposal 246: Oppose Proposal 247: Oppose Proposal 248: Oppose Proposal 249: Oppose
Proposal 250: Oppose Proposal 251: Oppose Proposal 252: Oppose
Proposal 253: Support With Amendments Proposal 254: Oppose Proposal 255: Oppose

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February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

I have owned property on the river since 1979 and witnessed the decline of the kings personally these fish must be protected no matter what the cost, cut the politics and money out of the equation and do whats best for returning these king runs back to what they once was

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

ron tomblinson
soldotna, AK

Submitted by: Mark Tornai
Community of Residence: Soldotna

My comments are in reference to Upper and Lower Cook Inlet. Proposal 6,10, 11, 18-24, 29 and 75-90. I am resubmitting my testimony, because there was a typo. I meant to say, open the Kenai up to bait for silvers on Aug 15th, not July 15th. See corrected testimony attached.

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Oppose	Proposal 86: Oppose
Proposal 87: Oppose	Proposal 88: Oppose	Proposal 89: Oppose	Proposal 90: Oppose

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See attached document in reference to proposals 6, 9, 10, 11, 18 - 24, 29, and 75 thru 100.

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose
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Proposal 86: Oppose	Proposal 87: Oppose	Proposal 88: Oppose	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Oppose	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Oppose
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Oppose	

February 04, 2024

Dear Chairman Wood and Board of Fisheries members:

My name is Mark Tornai, from Soldotna, AK. I have been sport fishing on the Kenai peninsula, Cook Inlet and Kachemak Bay since 1990 with friends and family. I am an avid offshore sport fisherman, and river fisherman throughout the peninsula. We (the board of fish, commercial fishermen, and sport fishermen) should do everything we can to conserve our resources and the protect the early and late run King Salmon, put the fish first! I believe the controls the Board of Fisheries put in place over the last several has helped to reduce the take of spawning king salmon. Rarely do I catch a spawning king off shore. If I do hook one, I release it immediately without taking it out of the water. I truly believe in the conservation of our special resources and the King salmon in our streams. My comments pertain to multiple proposals for the Upper and Lower Cook Inlet. Those proposals are 6, 9, 10, 11, 18 - 24, 29, and 75 thru 100.

Now is not the time to expand commercial fishing or lower escapement goals. Put the fish first and allow more fish onto the spawning grounds. These are my recommendations :

- Shut down the set netters on the East side of Cook Inlet if escapement goals are not expected as per the current Management Plan

- Re-evaluate and allow the drift fishing fleet in Cook Inlet to harvest the sockeye in areas that will minimize impact to the East side spawning kings.

- Close offshore sport fishing for King salmon North of the latitude of Bluff Point in Cook Inlet on May 15th - July 15, as this has been done in the past and proven to be affective.

- Reduce the offshore King Salmon limit to one per day for the entire year, with no annual limit, in Kachemak Bay zone, something needs to be done now before we ruin this fishery.

- Allow bait in the Kenai River for Silver salmon on August 15th, single hook only.

Sincerely,
Mark Tornai
Soldotna, AK

February 7, 2024

RE: UCI Proposal 167

Dear Alaska Board of Fisheries Members,

Thank you for your service to the State of Alaska and our fisheries. We know you have a complex and demanding job, and we thank you for the time and energy output into reviewing and considering Board of Fisheries proposals.

Please accept this letter on behalf of Trout Unlimited (TU) in support of Proposal 167. TU is the nation's largest hunting and angling organization dedicated to cold water conservation with more than 1,100 members and roughly 20,000 supporters that live and work throughout Alaska. TU members have incredible experience in the field, spending many hours fishing, hunting and recreating on Alaska's rivers each year. We also have dozens of business members who own and operate Alaska businesses. They include both sport-fishing businesses and commercial fishing operations that depend on Alaska's healthy and vibrant wild salmon and resident fish populations, which allow them to continue to contribute to our state and local economies. TU has active volunteer chapters in Fairbanks, Anchorage, the Mat-Su, on the Kenai Peninsula, and in Southeast Alaska and 13 staff who live in Alaska and who are dedicated to caring for Alaska's incredible fish habitat. Our mission is to bring together diverse interests to care for and recover rivers and streams so our children can experience the joy of wild and native trout and salmon.

We have an active presence on the Kenai River, supporting our local chapter, participating in education programs, coordinating restoration work, and hosting our Kenai Guide Ambassador program. The basis of our programs is to help exemplify, educate, and advocate for taking care of the fisheries in the area that so many Alaskans depend on.

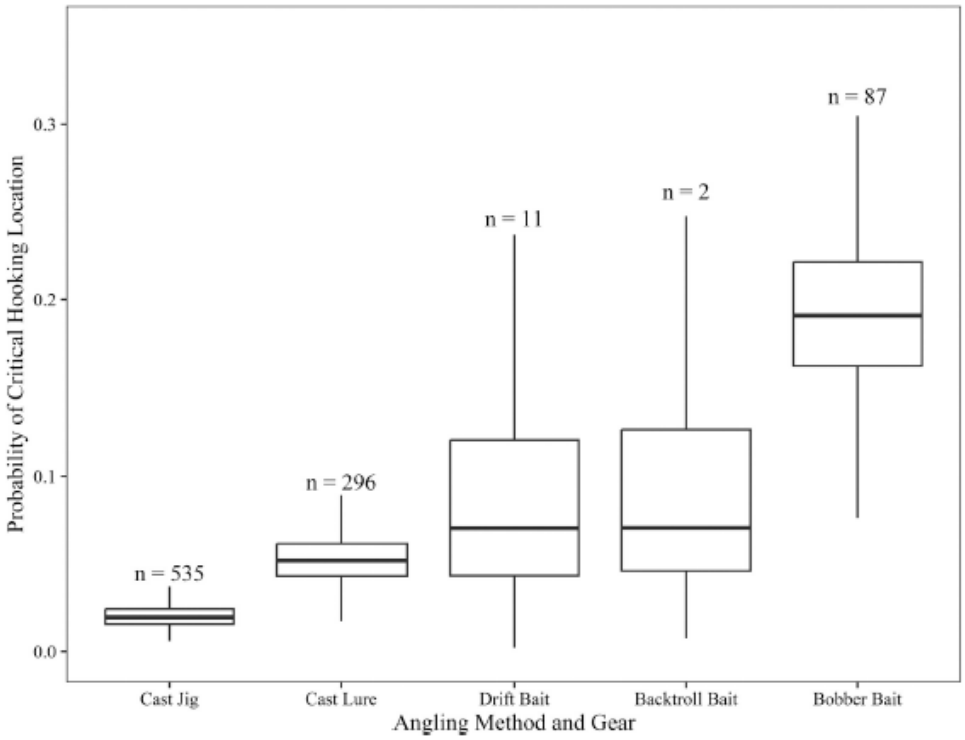
The Kenai River is beloved by Alaskans and visitors alike and fishing regulations and management decisions on the river have had to evolve and adapt to changing ecological and societal conditions. In order to protect these beloved fisheries, several areas of the Kenai River have long been limited to unbaited, artificial, single hook lures to prevent unintentional damage and mortality to both anadromous and resident fish. Proposal 167 seeks to update and expand the areas and durations of time where this type of fishing should occur. Specifically, the proposal would only allow fishing with an artificial, single-hook lure from January 1 - December 31 in the Kenai River from the ADF&G regulatory marker 100 yards below the Moose River confluence upstream to ADF&G regulatory markers at the outlet of Skilak Lake.

Studies have shown that fishing with bait significantly increases mortality in both rainbow trout and coho salmon due to the increased likelihood of being hooked in critical locations (e.g. gill rakers, esophagus, tongue, or stomach) which can cause a substantial increase in bleeding. In their study of post-release rainbow trout mortality, Schisler and Bergerson (1996) found bait analogues (scent-impregnated artificial eggs) fished

TROUT UNLIMITED: America's Leading Coldwater Fisheries Conservation Organization
P.O. Box 220834, Anchorage, AK 99522
nelli.williams@tu.org

passively (on a slack line) resulted in 32.1% mortality, compared to 3.9% of fish caught with an artificial fly. The authors also reported 78.3% of the fish hooked on passively-fished bait analogues and 45.7% of the fish hooked on actively-fished (on a tight line) bait analogues were hooked in critical locations, compared with less than 4% of fly-caught fish being hooked in a critical location.

In their recent study of catch-and-release survival of salmon and steelhead as a function of gear type and angling methods, Courter et al (2023) found a nearly 10-fold increase in the probability of hooking coho salmon in a critical location when using a bobber and bait rig (passive bait) when compared to cast jigs and lures (see chart). Vincent-Lang et al (1993) found hook location in sport-caught coho salmon significantly affected survival rates and estimated an 11.7% mortality rate for in-river coho salmon caught with bait. In the introduction of this study, the authors point out "Many salmon sport fisheries are conducted with bait, a practice which has been shown to result in high mortality rates for resident fish (Hunsaker et al., 1970; Wydoski, 1977; Warner and Johnson, 1978)".



Critical hook probability for coho salmon by combination of angling method and gear type. n = sample size for each angling method and gear type combination. Coulter et al, 2023.

The studies mentioned above are based only on a single hooking event, let alone instances where a fish might be hooked multiple times. ADFG's annual Sport Fishing Surveys show that the Kenai River experiences the highest number of angler- days fished statewide. With this high pressure, the likelihood of fish being caught multiple times would not be uncommon and inevitably would also increase the rate of mortality and fitness. Neither anadromous nor resident stocks of fish can sustain this level of pressure. The section of the Kenai River referred to in Proposal 167, is not only where Coho stage during the later periods of their lifecycle, but also where ADFG's Fishery Management Report NO. 20-01 states the highest number of resident species are caught. ADFG's Fishery Management Report No. 20-01, also states that most of Kenai River Coho are being

harvested below the Moose River confluence. With this understanding the collateral damage inflicted on resident species as well as coho, due to multiple baited hooks above the Moose River confluence, is unnecessary; and the complexity of this fishery should be taken into consideration in how it is managed.

As mentioned previously, Trout Unlimited Alaska's mission is to conserve cold-water fisheries and their habitat here in Alaska. While we recognize that fishing with bait is important in many rivers and fisheries, this proposal will still leave ample opportunity to harvest coho while at the same time adding a layer of protection during a vulnerable life stage for fish not put in the freezer, as well as resident species. The science indicates there is a high probability of increased mortality in both coho and resident species by fishing with bait in the area described in proposal 167. By keeping the fishing gear we use in the stretch of river to a single, unbaited artificial lure, we can help minimize our impact on spawning coho (who are typically past their eating prime) and resident fish until more research can be done. It is in our best interest to manage this fishery conservatively, so we don't end up in a similar situation to what we are currently in with king salmon.

With all this in mind we hope you will consider supporting Proposition 167. Please let us know if you would like to discuss this issue further and thank you, again, for your attention to this issue important to sustaining one of our state's most beloved fisheries.

Sincerely,

Nelli Williams

References:

Courter, I. I., Buehrens, T., Roes, M., Blackman, T. E., Briscoe, B., & Gibbs, S. (2023). Influence of angling methods and terminal tackle on survival of salmon and steelhead caught and released in the Cowlitz River, Washington. *Fisheries Research*, *268*, 106848.

Schisler, G. J., & Bergersen, E. P. (1996). Postrelease hooking mortality of rainbow trout caught on scented artificial baits. *North American Journal of Fisheries Management*, *16*(3), 570-578.

Vincent-Lang, D., Alexandersdottir, M., McBride, D., 1993. Mortality of coho salmon caught and released using sport tackle in the Little Susitna River, Alaska. Fish. Res. 15, 339–356.

Lipka, C. G., J. L. Gates, and S. K. Simons. 2020. Sport Fisheries of the Northern Kenai Peninsula Management Area, 2016–2018, with overview for 2019. Alaska Department of Fish and Game, Fishery Management Report No. 20-01, Anchorage.

TROUT UNLIMITED: America's Leading Coldwater Fisheries Conservation Organization
P.O. Box 220834, Anchorage, AK 99522
nelli.williams@tu.org

Submitted by: Nathan Tueller
Community of Residence: Anchorage

I am opposed to Proposal 43. As a lifelong sport and commercial fisherman in Lower Cook Inlet, Prince Williams Sound and the gulf of alaska, I can unequivocally state that the salmon hatchery programs are beneficial to the state of alaska and it's salmon runs.

The economys of alaskas costal towns depend on the hatcherys to produce the volume necessary to both provide opportunities for commercial fishermen, and to reduce pressure on wild runs.

The economic turmoil that this radical reduction in hatchery production would cause the fishermen and the costal towns of alaska cannot be emphasized enough. They are an integral part of the southcentral alaska salmon ecosystem and economy.

I believe these neverending proposals are funded by outside interests who have little understanding or concern as to how these changes would negatively effect our state. It is frustrating that it has to be revisited every BOF cycle.

Stay the course. Leave the management plan alone. Reject proposal 43.

Proposal 43: Oppose

February 12, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm part of the subsistence, commercial, sport, and personal use fisheries in Soldotna, Alaska. I am thankful for Alaska's robust hatchery programs and think they should be expanded to provide more salmon for an ever-growing demand from our vital tourist industry, personal use fishermen (myself included) and subsistence users. While pink salmon are harvested primarily as a vital protein source by commercial fishermen, why not also provide more chinook, coho and chum salmon for river systems in distress like the Yukon, Kuskokwim, Matanuska and Susitna? Instead, we have proposals, out of turn, that would irreparably harm coastal communities and fishing families that depend on sustainability minded- hatchery operations for an economically viable fishery.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level

allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Abigail Turner
[redacted]
Soldotna, Alaska

UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

USAG On Proposal 43

United Southeast Alaska Gillnetters **oppose Proposal 43.** We understand that adoption of this proposal will result in steep declines in economic activity and in opportunity for sport/personal users.

Commercial fishermen, processors, regional hatchery associations, charter operations, and the State of Alaska, all stand to lose. Commercial fishermen will harvest less, processors will sell less, hatchery associations will lay people off, charter operators will have reduced opportunity, and the state will lose raw fish tax revenues.

Hatcheries have in many cases created opportunity where there was none or minimal for personal use and sport fisheries. The preferred species, king and coho, are also the most expensive to raise, and would definitely see reduced production if this proposal were adopted.

In our estimation, the benefits of hatchery production to coastal communities are immense. The reasoning in this proposal gives us no reason to think otherwise. There appears to us to be a lack of empirical evidence to support the harms indicated by the proposer, and given the source of the proposal (probably the most non-coastal community in the state), they probably under-estimate the impacts that reducing production by such draconian measures would have on the people who actually live and do business in coastal communities.

Again, we are a hard no on proposal 43. We appreciate the opportunity comment.

Thanks,

Max Worhatch, Executive Director

United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

FEB 06 2024

IN REPLY REFER TO:
OSM.24016

John Wood, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Wood:

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the 181 proposals being considered at the Upper Cook Inlet Finfish meeting from February 23 – March 7, 2024. The attached comments from OSM regard proposals that are likely to impact federally qualified subsistence users or associated fisheries resources within Federal subsistence management jurisdiction.

Other proposals being considered during this meeting may also affect Federal subsistence fisheries and users. Most of these other proposals involve fisheries that are outside of Federal jurisdiction and some of them involve areas of overlapping State and Federal jurisdiction. Adoption of these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. OSM may wish to comment on other items that impact federally qualified subsistence users.

We appreciate the opportunity to provide input on these important regulatory matters and look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Amee Howard
Acting Assistant Regional Director

Enclosure

cc: Federal Subsistence Board
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Art Nelson, Exec Director, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Alaska Department of Fish and Game
Administrative Record

COMMENTS TO THE

ALASKA BOARD OF FISHERIES

Upper Cook Inlet Finfish Meeting

February 23–March 7, 2024

Anchorage, Alaska

Office of Subsistence Management (OSM)

PROPOSALS 86, 165, 166, 167, 178, 179, 180, 181

Proposal 86 - Prohibit bait in the Kenai River through Oct 31 if the king salmon sport fishery is closed by EO.

Proposal 165 - Allow sport fishing in the Kenai River with only one unbaited, single-hook, artificial lure from January – July.

Proposals 166 - Expand time and area waters of the Kenai River are limited to only one unbaited, single-hook, artificial lure and redefine "artificial fly".

Proposal 167 - Expand time and area in waters of the Kenai River that are limited to only one unbaited, single-hook, artificial lure.

Proposal 178 - Reduce the season for the Kenai River Coho Salmon sport fishery.

Proposal 179 - Close additional flowing waters of the Upper Section Kenai River Drainage Area from the Sterling Highway bridge at the outlet of Kenai Lake, downstream to Sterling Highway Mile 53 Bridge to sport fishing from January 1 – June 10.

Proposal 180 - Close waters of the Kenai River from the Sterling Highway Bridge at Mile 53 upstream to Kenai Lake to sport fishing from January 1 – April 1.

Proposal 181 - Close waters of the Lower Section Kenai River from an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake from January 1 – June 10.

Current Federal Regulations:

50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a "barb" means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(xix) A rod and reel;and

* * *

50 CFR §100.27(e)(10) Subsistence taking of fish. Cook Inlet Area

(i) General area regulations.

* * *

(L) Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein or by issuance of a Federal special action.

* * *

(iii) Seasons, harvest limits, and methods and means for Kenai River fisheries.

* * *

(A) Kenai River dip net or rod and reel; salmon.

* * *

(2) You may take sockeye, Chinook, coho, and pink salmon through a dip net or rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided in this section.

(i) For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for Chinook salmon prior to July 16 (unless otherwise provided for in this section), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released.

(ii) At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15 through August 31.

(iii) At the Kenai River mile 48 site, dip netting is allowed while either standing in the river or from a boat, from Federal regulatory markers on both sides of the Kenai River at about river mile 48 (approximately 2 miles below the outlet of Skilak Lake) downstream approximately 2.5 miles to a marker on the Kenai River at about river mile 45.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15 through August 31.

(3) Fishing seasons are as follows:

Table 8 to Paragraph (e)(10)

Species	Size	Location
Sockeye salmon	June 15–August 15	All three sites
Chinook salmon	July 16–September 30	Kenai River sites only
Pink salmon	July 16–September 30	Kenai River sites only
Coho salmon	July 16–September 30	Kenai River sites only

(C) Kenai River rod and reel only: salmon.

(1) For federally managed waters of the Kenai River and its tributaries, you may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage.

(2) Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.540), except for the following harvest and possession limits:

Table 10 to Paragraph (e)(10)

Species	Size	Limits

Chinook salmon– (January 1 through July 15)	Less than 46 inches or 55 inches and longer	2 per day and 2 in possession.
Chinook salmon– (July 16 through August 31)	20 inches and longer	2 per day and 2 in possession.
All other salmon	16 inches and longer	6 per day and 6 in possession, of which no more than 4 per day and 4 in possession may be Coho salmon, except for the Sanctuary Area and Russian River where no more than 2 per day and 2 in possession may be Coho salmon.

* * *

(i) In the Kenai River below Skilak Lake, fishing is allowed with up to two baited single or treble hooks June 15 through August 31.

* * *

(D) Kenai River and tributaries under ice jigging and rod and reel; resident species.

(1) For federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, you may take resident fish species including lake trout, rainbow trout, and Dolly Varden or Arctic char with jigging gear through the ice or rod and reel gear in open waters. Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these resident species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.540), except for the following harvest and possession limits:

* * *

(2) For federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, you may take resident fish species including lake trout, rainbow trout, and Dolly Varden or Arctic char with jigging gear through the ice or rod and reel gear in open waters. Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these resident species under

Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.540), except for the following harvest and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Federal subsistence fishing seasons, areas, and methods and means sometimes default to State of Alaska sport fishing regulations. Adopting any of these proposals would aid in the conservation of species but would limit opportunity for Federally qualified subsistence users to some degree because of this coupling of Federal and State regulations.

Federal Position/Recommended Action: OSM is **Neutral** on these proposals

Rationale: OSM supports measures to decrease mortality of populations during times of conservation concern. However, adopting any of these proposals would limit opportunity for federally qualified subsistence users because Federal subsistence regulations sometimes default to State sport fishing regulations. OSM is neutral because the Federal in-season manager could issue short-term special actions to restore Federal subsistence opportunity if necessary for the continuation of subsistence uses. Federal subsistence fisheries proposals could also be submitted during a future cycle to decouple Federal subsistence regulations from State sport fishing regulations, thereby permanently restoring Federal subsistence opportunity.

PROPOSAL 147

5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area.

Modify the Kenai River king salmon annual limit.

Current Federal Regulations: See comment above on proposals 86, 165, 166, 167, 178, 179, 180, 181

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Federal subsistence harvest limits will not be impacted were this proposal adopted. This proposal may help conserve Chinook Salmon and increase future harvest opportunity by federally qualified subsistence users. The reproductive potential of female Chinook Salmon is positively related to body size (Quinn 2005). Therefore, higher escapement of large-bodied female Chinook Salmon may increase the reproductive success of this population, which in turn, may increase the number of Chinook Salmon available for harvest by federally qualified subsistence users during future runs.

Federal Position/Recommended Action: OSM **Supports** Proposal 147

Rationale: OSM supports measures to reduce harvest during times of conservation concern. This proposal may increase future harvest opportunity for federally qualified subsistence users while also

helping to conserve Kenai River Chinook Salmon. Adopting this proposal is unlikely to negatively affect federally qualified subsistence users because Federal harvest limits for this species would be unchanged.

Literature Cited: Quinn, T. P. 2005. The behavior and ecology of Pacific salmon and trout. University of Washington Press, Seattle.

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

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PC221

February 7, 2024

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
[redacted]

RE: Proposal 43 – 5 AAC 40.820. Basic Management Plan

Chairman John Wood, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments for a proposal submitted to the Alaska Board of Fisheries (BOF) for deliberation at the 2024 Upper Cook Inlet Finfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) respectfully provides the following comments for the board's consideration **in opposition to Proposal 43:**

Proposal 43 –5 AAC 40.820. Basic Management Plan

VFDA submitted public comments (PC248) in opposition to Proposal 43 for the 2023 Lower Cook Inlet (LCI) Finfish meeting. I have attached them for easy reference as well as RC045, which provided the source for my testimony on hatchery Pink Salmon numbers in the North Pacific Ocean.

These additional comments address clarifications made by the Fairbanks AC, and will share other pertinent facts and resource materials for the boards consideration as it deliberates this proposal.

At the LCI meeting, the Fairbanks Advisory Committee (FAC) submitted a clarification to Proposal 43 noted as RC021. In its RC, which was not approved by the AC at that time it was submitted, it clarified that Proposal 43 does in fact seek to cap pink salmon production **to** 25% of 2000 levels for both the Port Graham Hatchery and the Tutka Bay Lagoon Hatchery. The FAC makes it clear that their intent is to fully impose a 75% reduction in Cook Inlet Aquaculture Association hatchery pink salmon production, which if adopted by the BOF would have a crippling effect on its ability to operate and may certainly bankrupt CIAA and eliminate all the positive habitat restoration and personal use fishery benefits they provide.

The FAC continues to further unsubstantiated claims of an agreement by the hatchery operators to reduce hatchery production. Again, the proposers have not ever provided a record of any such agreement to reduce production that existed back in year 2000, nor any time thereafter. To the contrary, hatchery operators have no record of any such agreement and RC039, submitted by former hatchery executive Steve Reifenstuhl, has been provided showing that this claim is an inaccurate account of the referenced meeting outcome.

For these reasons and for reasons stated in our many comments submitted over the years for proposals of this nature, VFDA is opposed to Proposal 43 and we strongly urge the board to reject it.

Much of the justification presented by the FAC and others to amend hatchery permits is an attempt to create a conservation concern by espousing that pink salmon are *"threatening entire ecosystems and other salmon and marine species"* and that *"wild salmon are starving"*. There is no scientific evidence that pink salmon, of hatchery origin or otherwise, are creating such a massive effect on marine ecosystems.

To address some of the recent scientific papers on ocean carrying capacity that are submitted as "proof", Alaska's PNP Salmon Hatchery Operators have provided an on time public comment titled *A Response to Synthesis Research*, which highlights many factors that should be considered when reviewing such papers regarding hatchery policy.

There is much misunderstanding of the hierarchy of pink salmon and more importantly hatchery pink salmon within the ocean environment. Here are a few things to consider:

- Pink salmon represent the greatest number, or abundance, of salmonids in the ocean in any given year, but not in biomass.

- Mortality is a significant factor in the first thirty to forty-five days of ocean life for pink and chum when mortality on average is between 50% to 90%.[1]
- The vast majority of pink salmon in the North Pacific and Bering Sea are from wild populations, estimated at approximately 25 billion fry annually throughout the Pacific Rim for all salmonids. An additional 5 billion fry are hatchery pink and chum fry from Russia, Japan, and Alaska. The hatchery proportion in terms of abundance of all pinks is about 15%.[2]
- The biomass of hatchery pinks is an even smaller proportion, perhaps less than 5%.
- It has been recently quoted that during 1990–2015, hatchery salmon (Japan, Korea, Russia, and Alaska) constituted approximately 40% of the total biomass of adult and immature salmon in the ocean.
- It is correct to say that "of the total wild and hatchery adult and immature salmon biomass in the North Pacific, 40% is hatchery origin". It is incorrect to state that 40% of pink, or pink and chum are Alaska's hatchery-originated salmon. Alaska's hatchery component of that 40% is closer to 20%, with Japan and Russia contributing the remainder.
- Of the five billion hatchery salmon released into the Pacific each year, Russia (pink & chum) and Japan (chum) release about three billion salmon fry while Alaska releases approximately two billion fry (pink & chum).
- From 1990 to 2015, pink salmon's immature and mature biomass (hatchery and wild) was around 800,000 metric tons, or 22% of total biomass.
- Therefore, the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%.
- In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Since then, biomass of salmon has increased current levels of 4-5 million tons, representing 4-8% of total nektonic biomass during period of high abundance.[3]
- In terms of total ocean nektonic biomass, salmon represents a small proportion. Prince William Sound hatcheries release about 800 million pink salmon fry or 3% of total pink salmon numbers in Pacific Rim. Extrapolation of PWS pink salmon biomass as a proportion of total nektonic biomass would be a tiny fraction of one percent.

Conclusion:
Recent scientific publication proposes, and unfortunately some members of the public readily accept, that pink salmon are of such high abundance (numbers of salmon) that they must be causing significant and harmful impacts, both long and short term, to the marine ecosystem. Lost in the discussion, or even outright ignored, is the fact that pink salmon biomass from all sources, both wild and hatchery, is relatively small among the total biomass of pacific salmonids, estimated at less than one quarter of the total estimate. When put into finer perspective against the enormity of the total nektonic biomass of the North Pacific, annual Prince William Sound hatchery pink salmon releases, the largest in Alaska at an average of 800 million fry, is estimated at less than one percent of the overall biomass. Why is this important as it relates to Proposal 43? Because the release of pink salmon fry from all CIAA hatcheries combined for 2022 totaled only 57 million fish.[4]

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals**. We would respectfully request that the board reject Proposal 43, and any other request to reduce hatchery production.** Thank you for your consideration.

Sincerely,

Mike H. Wells
Executive Director

[1] Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia

[2] Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

[3] Shuntov, V. P., Temnykh O., and Ivanov O. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon *(Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28

[4] ADF&G - Regional Information Report No. 5J23-04

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PC221

November 12, 2023

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RE: Proposal 35 – 5 AAC 21.XXX The Kachemak Bay Wild Fish Priority Management Plan
RE: Proposal 36 – 5 AAC 36.372 Tutka Bay Lagoon Salmon Hatchery Management Plan
RE: Proposal 43 – 5 AAC 40.820. Basic Management Plan

Chairman John Wood, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments for proposals submitted to the Alaska Board of Fisheries (BOF) at the 2023 Lower Cook Inlet Finfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) respectfully provides the following comments for the board's consideration **in opposition to Proposals 35, 36, and 43:**

Proposal 35 – 5 AAC The Kachemak Bay Wild Fish Priority Management Plan

Proposal 35 seeks to create a wild fish priority management plan for Kachemak Bay salmon because of the author's perception that existing conservation structures do not adequately protect them. Alaska's natural salmon resources have guaranteed priority by the *Alaska Constitution Article VIII, Section 4*, mandating management of all wild salmon under the sustained yield principal. Other directives, such as *5 AAC 39.222 Policy for Sustainable Salmon Fisheries* and *5 AAC39.220 Policy for the Management of Mixed Stock Fisheries*, provide strong guidelines to further buttress this constitutional mandate. In addition, the Alaska Department of Fish and Game (ADF&G) has broad regulatory authority to set time and area restrictions to further reduce the harvest of wild salmon in common property and cost recovery fisheries to ensure escapement as necessary.

The author espouses that because some measure of wild stocks are harvested in LCI common property and hatchery cost recovery fisheries, it justifies the need for an area specific conservation plan. Interceptions of wild salmon are common in mixed stock fisheries throughout the state, and this factor is managed quite effectively by ADF&G in-season to ensure escapement goals are met. It should be noted that neither pink, chum, or sockeye salmon stocks are currently recommended as a stock of concern for Kachemak Bay as stated in the *ADF&G Memorandum on LCI Stock of Concern Recommendations (September 20, 2023).*

VFDA does not support the creation of area specific conservation plans that create additional and unnecessary regulation. We feel strongly that ADF&G currently has the tools necessary to reduce the harvest of natural salmon should ADF&G determine it necessary to protect Kachemak Bay wild salmon stocks. **For these reasons, VFDA opposes Proposal 35.**

Proposal 36 - 5 AAC 36.372 Tutka Bay Lagoon Salmon Hatchery Management Plan

Proposal 36 seeks to insert the following language into 5 AAC 21.372 which would stipulate Cook Inlet Aquaculture Association:

"produce revenues from the harvest and sale of returning fish that are at least equal to the costs of hatchery operation and operate efficiently so that at least 50% of the fish are harvestable by common property fisheries"

VFDA does not support the promulgation of regulation within individual hatchery management plans that stipulate a set percentage of enhanced salmon returns be provided to the common property. Variabilities in returns, budgets, and prices that associations receive for cost recovery sales do not lend themselves to rigid contribution mandates. If adopted as written, Proposal 36 will have a destabilizing effect on CIAA. The process by which annual operating budgets and corresponding cost recovery goals are set is an internal process best left to the boards of directors of individual hatchery associations and not the BOF. In addition, the submission of Annual Management Plans to Regional Planning Teams provides opportunity for comment by the public and various user groups on hatchery production, financial plans, and efficiency of operations.

Adoption of Proposal 36 would set a dangerous precedent by which the financial requirements of an aquaculture association would be subjected to the political process of the BOF every three years. This action would effectively usurp the fiduciary role of aquaculture association boards. **For these reasons, VFDA opposes Proposal 36.**

Proposal 43 –5 AAC 40.820. Basic Management Plan

As submitted, this proposal would apply to the *Cook Inlet Salmon Enhancement Allocation Plan,* capping pink salmon production to 25% of 2000 levels. This is not a 25% reduction from current permitted capacities, but a 75% reduction. Because it has been copied and submitted as Proposal 59 for the 2024 Kodiak meeting, it most assuredly is intended to be applied to all Alaska's hatchery permits statewide if adopted on a regional level.

The intent and principals of Proposal 43, which requests the reduction of hatchery egg take permits by direct board action, have been submitted similarly as ACR's and proposals to the board at least three times prior. Each time they have been soundly rejected by the board as shown:

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session. Sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

Proposal 54 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting. Sought to amend the PWS Management and Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 95 opposed)**

Proposal 55 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting. Sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

The Fairbanks AC has now resubmitted these same failed proposals in the 2023/2024 board cycle. Nothing has changed, other than the author of the proposal. Proposal 43 continues to rely on an unsubstantiated claim of an agreement by the hatchery operators to reduce hatchery production. The proposers have not provided any record of any such agreement showing hatchery operators agreeing to these draconian measures.

The blanket statements of overproduction, and the impacts of hatchery pink salmon on the marine environment, are unsubstantiated as well. As before, the proposer provides no new scientific evidence to support these claims and fails to recognize that pink salmon egg takes of Cook Inlet hatcheries are currently under permitted capacities for recent years. Prince William Sound hatchery production of pink salmon, the largest in the state, has remained relatively stable for decades, experiences strong returns of natural pink and other species of salmon and consistently achieves required escapement goals. Production of hatchery pink salmon equates to approximately 15% of the overall abundance of pink salmon in the North Pacific, using

data provided by the North Pacific Anadromous Fish Commission. The vast majority of pink salmon within the ocean are of natural origin**.** **PC221**

Adoption of Proposal 43 will cause significant harm to CIAA, capping its pink salmon production at levels that are unsustainable; this will likely have an effect on not just the commercial fisheries, but sport, subsistence, and personal use as programs for other species dry up for lack of funding. As ADF&G stated in *ADF&G RIR No. 5J23-06 Staff Comments* on the proposal, this reduction of permitted capacity,

" …. is not likely to result in improved productivity of western Alaska or Cook Inlet salmon stocks."

I would respectfully point out that hatchery operators have spent considerable time and money addressing these short-sighted attempts to reduce hatchery production and damage Alaska's economy. The BOF and ADF&G have also spent considerable resources addressing and deliberating these matters, most recently at the 2021 PWS Finfish meeting where the proposer failed to submit public comment or attend in support of their proposals.

For these reasons and for reasons stated in our many comments submitted over the years for proposals of this nature, VFDA is opposed to Proposal 43 and we strongly urge the board to reject it.

VFDA opposes these proposals because of the potential they have to create unnecessary regulation and significantly harm not only Cook Inlet hatcheries, but other salmon enhancement programs statewide. The State of Alaska has invested heavily in its hatchery programs through its fisheries enhancement loan program and has a vested interest in the long-term viability of our programs and the benefits fisheries enhancement provide coastal communities and all that depend on them.

For decades, the BOF and the Commissioner of ADF&G have successfully managed Alaska's hatcheries under two general principles; that the Board allocate returns of adult salmon and the Commissioner administer hatchery permits. This understanding has served Alaska and the resource well because authorizations for hatchery permits are rigorously vetted through robust analysis and sound scientific principles, both considering a wide range of effects.

The board's previous and consistent decisions to deny requests to amend hatchery permits is proper and we urge this current Board of Fisheries to observe the historic record when considering repeated requests by the public for direct board intervention to limit or reduce hatchery production.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals**. We would respectfully request that the board reject Proposals 35, 36, 43, and any other request to reduce hatchery production.** Thank you for your consideration.

Sincerely,

Mike H. Wells
Executive Director

Submitted by: Benjamin Van Alen
Community of Residence: Juneau, Alaska

Thank you for accepting my comments IN SUPPORT OF PROPOSAL 43 - and all proposals seeking to moderate or curtail salmon hatchery operations in Alaska and around the North Pacific Rim.

Of all the conservation, allocation, environmental, and funding challenges we face managing salmon fisheries in Alaska, at least the State has full control over the number of salmon released from hatcheries.

Hatcheries are intended to supplement wild salmon populations, not supplant them. It is wonderful that we are now 50 years into our modern hatchery experiment. The null hypothesis is that “nature knows best” and the alternate hypothesis, the one we are trying to prove, is that “we can do better than nature in nature”. Can we ‘fix’ nature’s naturally ‘poor’ egg-to-fry survival ‘problem’ by artificially mating, rearing, releasing billions, and harvesting millions of hatchery salmon without harming wild salmon? Are there unintended ecological, financial, or allocative consequences?

There are only three problems with this experiment: 1) nature is always right, 2) biotic abundance is limited by the numbers of viable adults not the numbers of babies, and 3) the experiment is a waste of money in the first place. Nevertheless, this experiment helps us understand: 1) that nature is always right; 2) the factors limiting biotic abundances, and 3) that hatcheries have no place in sustaining wild salmon and the fisheries that depend on them.

I include a set of “No Free Lunch” PowerPoint slides to help justify my assessment that hatcheries have no place in modern salmon management. These slides extend and complement the “Wild, Natural, Sustainable… or Hatchery” slides I included with my comments to the 2023 Lower Cook Inlet Board of Fish meeting.

Lastly, permitting and managing salmon hatcheries is the responsibility of the Alaska Department of Fish and Game. I appreciate that the efficacy of hatcheries is being discussed in the Alaska Board of Fisheries’ open public process. It might be better if the Department had a ‘science panel’ with a similar open public process. Alaska’s constitution provides an important separation of responsibility for regulatory decisions affecting allocation (the Board) and those affecting conservation (the Department).

(See attached .pdf of "No Free Lunch" .pptx slides)

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No Free Lunch*

Slides in Support of Proposal 43

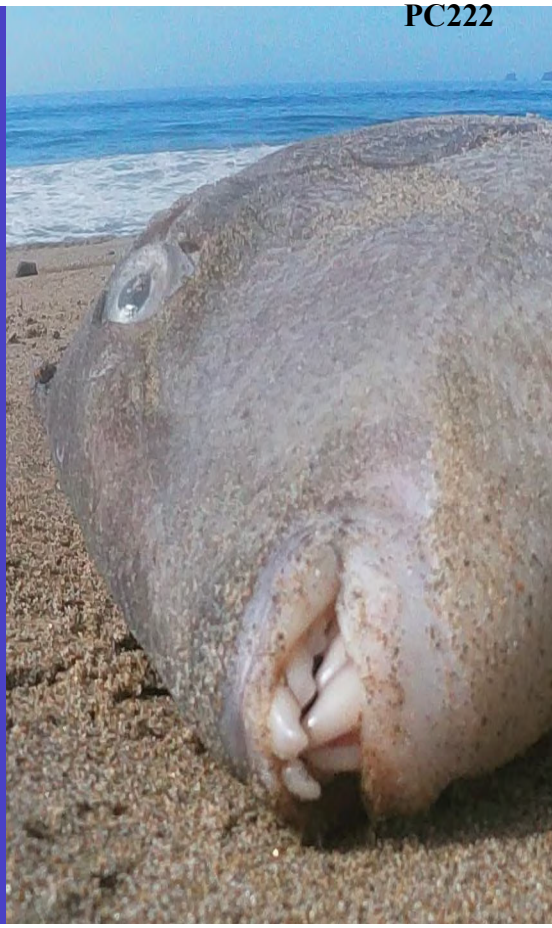
Upper Cook Inlet Alaska Board of Fisheries meeting

Anchorage, Feb. 23 – Mar. 6, 2024

Benjamin Van Alen

Wild Alaskan Salmon Biologist

February 6, 2024



***from: "There is no such thing as a free lunch" (Commoner, B. 1971. The Closing Circle: Nature, Man, and Technology. Bantam Books, New York.)**

...but a free *Haiku*...

The Science of Science?

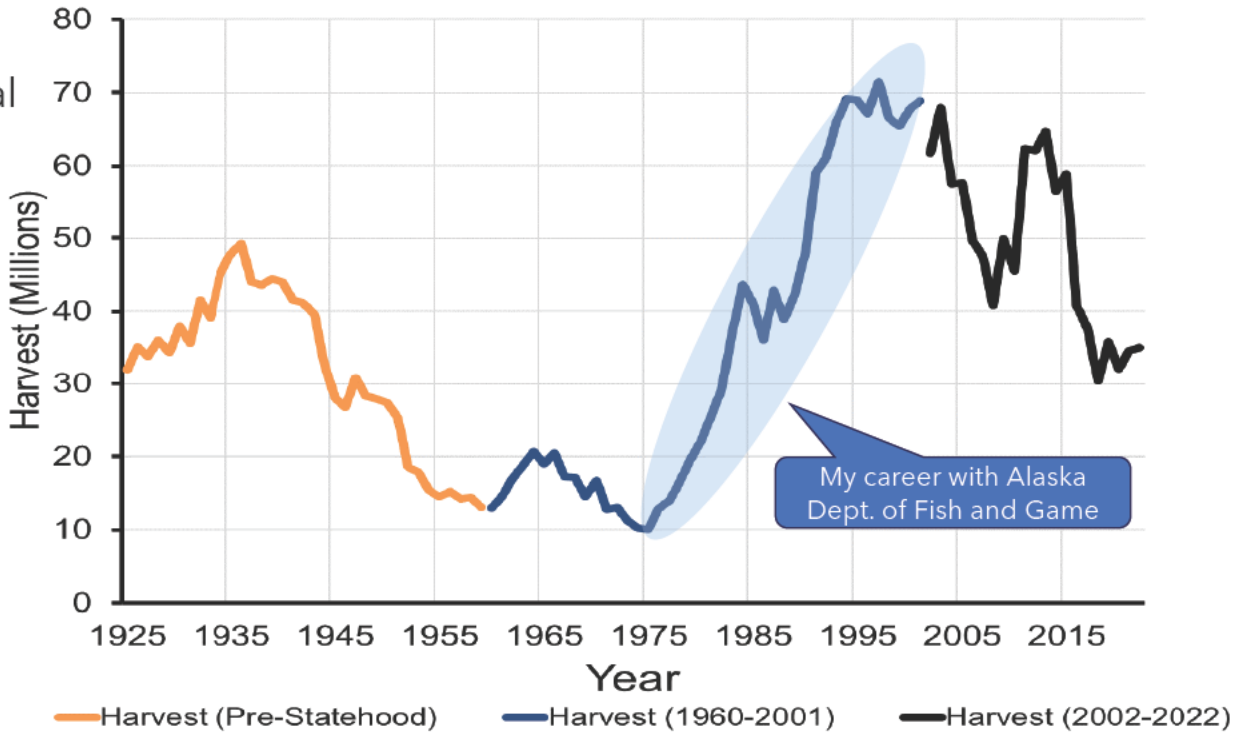
Question everything,
you want to be proven wrong,
unless you're right, right?

Everything I learned…
I learned questioning why this boom-bust-boom-bust

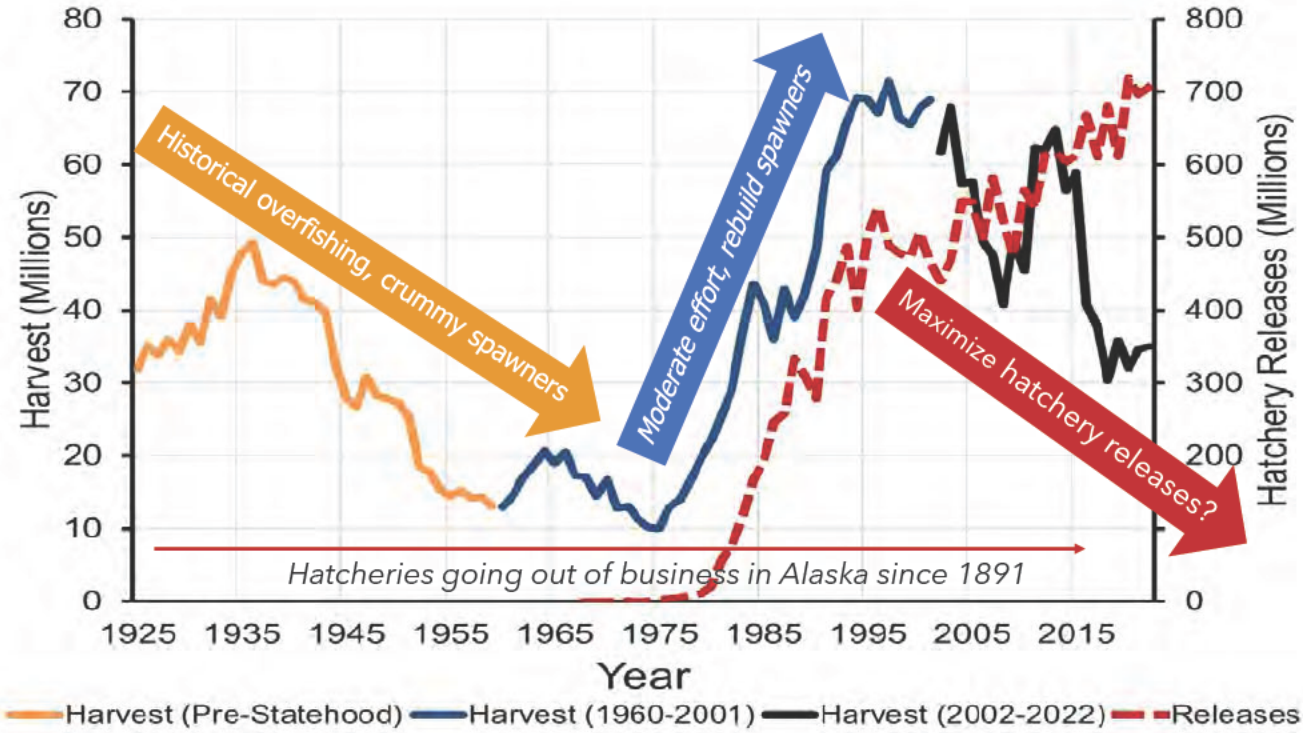
Commercial Salmon Harvest

Southeast Alaska

(5-yr, date centered, moving averages)



I learned…It takes wild spawners to make spawners



I observed, in Nature, that…

The **Carrying Capacity** for **Biota** is:

1. **Limited** — On our inorganic element-limited Earth
2. Already **Filled** with — No open niche
   1. Locally adapted biota — Biodiversity
   2. Competing/cooperating to rear viable offspring — Fitness
3. **Sustained** by the recycling of their nutrient elements — biogeochemical

Nature's "Laws of Biotic Sustainability"?

For all Biota?

On land and sea

Abundance is limited by:

- **Carrying capacity** (competition for space, water, food, and survival)

  not

- **Reproductive capacity** (i.e., numbers of seeds, eggs, or babies)

  for

- **All Biota**

Photo credit: Nooksack Salmon Enhancement Association

Carrying capacity, the kitchen not the bedroom, for every critter

It's the spawners that die, not the poor egg-to-fry

Carrying Capacity

Want more sheep? Get a bigger, more productive, field

fewer babies

more rain, more sun

…not hungry anymore

To grow plants or animals we've had to…

- **Control the Environment**
  - Control/remove what is naturally there
  - Grow locally adapted seed/stock
  - Limit seeding/stocking rates
  - Manage
    - Nutrition
    - Water
    - Wastes
    - Pests
    - Diseases
- **Fertilize***

*…and how is our "green revolution" reliance on synthetic fertilizers sustainable?

We eat cultivated food*

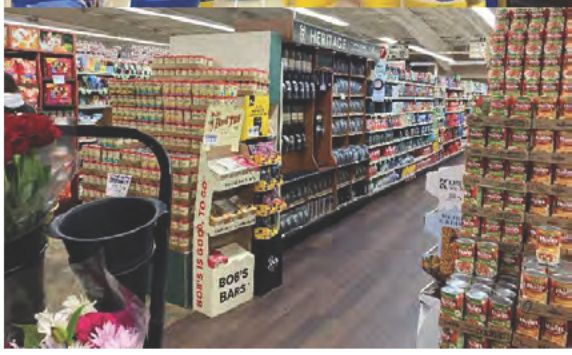
Definition:
Agriculture/Aquaculture

Breeding, rearing, and harvesting animals and plants in **controlled environments****

---

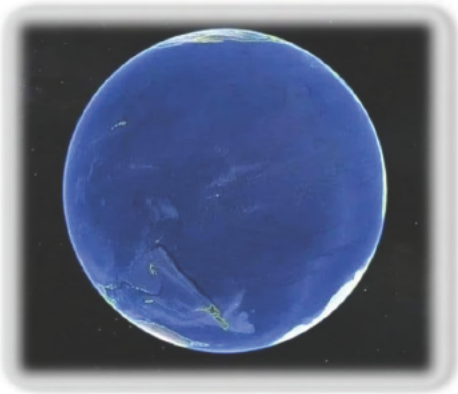
*what nearly all 8 billion people on Earth mostly eat

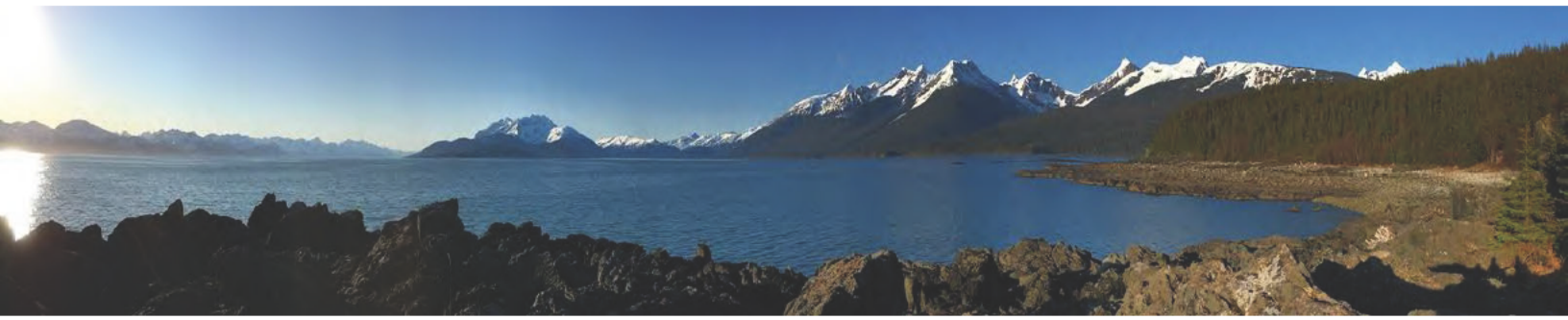
**the Mighty Pacific is not a "controlled environment"



The ocean *is* Nature – wild and uncontrollable

- Why assume free food from the Ocean?
- Because the Ocean is big and complicated?
- That Nature's "Laws of Biotic Sustainability" differ within the biosphere?
  - Lithosphere, hydrosphere, and atmosphere?





ecological overshoot w/ industrial fishing?

little "e.o."

Biota using ecosystem resources faster than they are being recycled

- Industrial-scale, one-way, removal of biotic nutrients out of an ecosystem
- Where on land has this proven
  - Ecological?
  - Sustainable?
  - Profitable?

Free food from the sea, How could that be?

ecological overshoot w/ industrial hatcheries?

little "e.o."

And the "Blue Foods" movement?

Biota using ecosystem resources faster than they are being recycled

- The grazing of introduced biota that consume more nutrients than they recycle
- Where on land has this proven
  - Ecological?
  - Sustainable?
  - Profitable?

We have allowed hatchery fish to elbow their way into the ecosystem potluck without bringing a dish

If biotic carrying capacity is…

- Limited
- Filled with locally adapted biota
- Sustained by the recycling of their nutrients

Then industrial fishing…

- Extracts nutrients
- Reduces carrying capacity

And we must…

- Moderate harvests
- Actively recycle nutrients*

*this ain't happening – go technology go?

If biotic carrying capacity is…

- Limited
- Filled with locally adapted biota
- Sustained by the recycling of their nutrients

Then industrial hatcheries…

- Put wild and hatchery fish in **direct competition** for **declining resources**

And we should…

- Close hatcheries
- Manage for wild habitat and spawners

...and another free *Haiku*...

The Hatchery Fix?

Fixing Mother Nature
Thousands of experiments
A waste of money

Hatchery fish swim with wild fish and must...

- increase competition
- decrease growth
- increase predation
- decrease survivals
- increase straying
- decrease fitness and biodiversity
- increase harvest pressure
- decrease management precision

On **Wild** fish

Swimming "Buddies"
You need to question Hatchery interaction?
Only one ocean

Taking marine derived nutrients to the next trophic level.
(Eli Sheakley, Hoonah Indian Association fisheries technician)

We can fill the carrying capacity

- With wild fish

  or

- Hatchery fish

  BUT

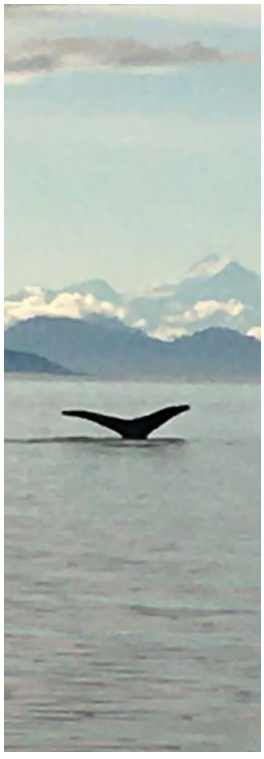
- It is the **nutrient cycling** of wild fish that helps maintain the carrying capacity

Wild Salmon
Spawn, die, nutrify
Nature's little upwellers
Life as we want it!

Insatiable Eli again, 10-years later

What if mega hatchery releases continue…

- Reduced ocean productivity
- Reduced fish production
- Reduced biodiversity, fitness
- Highly variable and declining survivals/returns
- Increased ecologic risk from
  - Hatchery problems
    - Water supply, disease outbreak, fitness
  - Climate changes, zoonosis
- Fatter whales, thinner wallets



In summary, Ocean Ranching is…

- Not what happens Naturally
- Supplants wild production
- Not sustainable
  - Ecologically
  - Financially
  - Legally
- Must be curtailed
- For a healthy ecosystem
- And abundant salmon, herring, eulachon…

Nature Knows Best

Doing in Nature
So different than Nature
Better than Nature?

Best to spend some hatchery savings

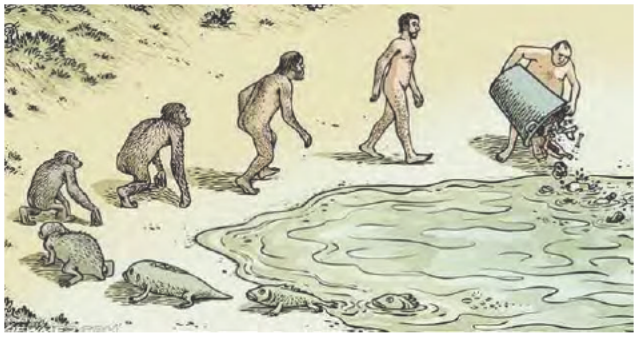
- On assessment and management of wild stocks

(i.e. counting fish at remotely monitored video weirs)

"If 10% of the money spent on hatcheries was spent on basic stock assessment of wild fish we'd have more fish and a management program to maintain them."
(what I heard Dr. Brian Riddell, CDFO, say years ago)

Do we really need data to prove Nature right?

…for what happens naturally *is* the positive result of billions of experiments in the competition and cooperation among biota in the biosphere.



Nope, but…

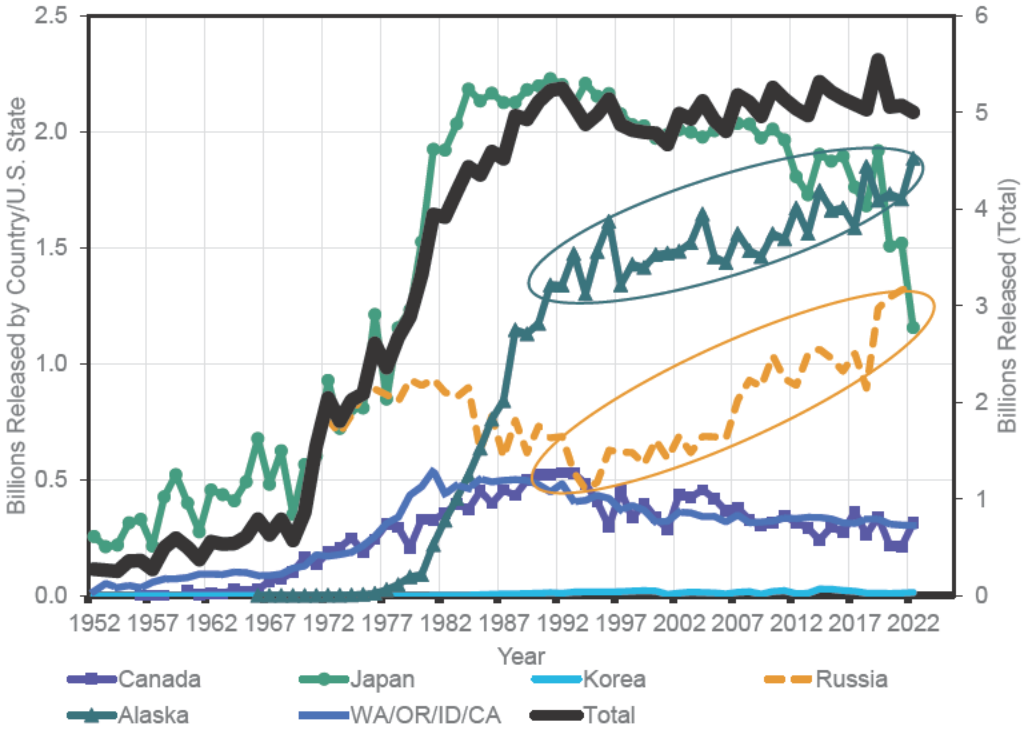
Observe and question…

Huge hatchery releases in the North Pacific

Releases since 1989:

- Significantly* up
  - Alaska
  - Russia
- Significantly* down
  - Japan
  - Canada
  - WA/OR/ID/CA

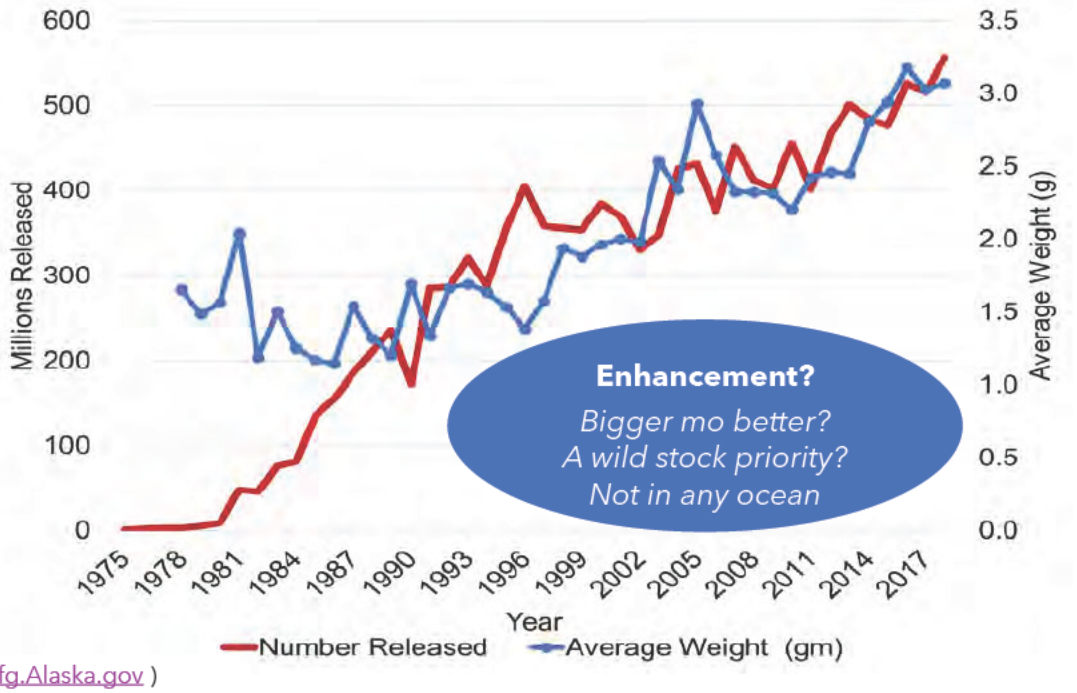
*Spearman's rho rank correlation trend test α=0.05



(Source: www.npafc.org January 2024)

SE Alaska hatchery chum – more & bigger

To have a survival advantage over wild fish?



(Source: www.adfg.Alaska.gov)

Hidden Falls Hatchery Chum

Boom and Bust

The biggest in SE Alaska

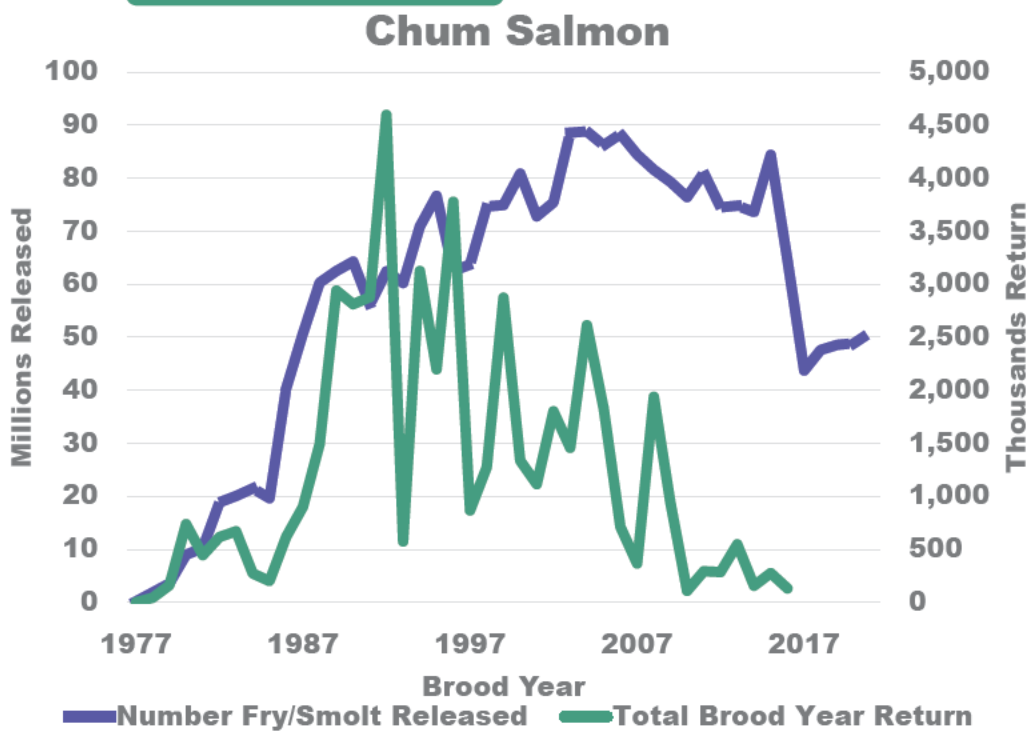
The biggest in SE Alaska

- A pattern?
  - Returns Peak

    then
  - Returns highly variable and declining

    and now
  - Challenges meeting Brood Stock and Cost Recovery goals

    despite
  - Huge Releases



(Source: www.adfg.Alaska.gov)

Hidden Falls Hatchery Coho
Boom and Bust

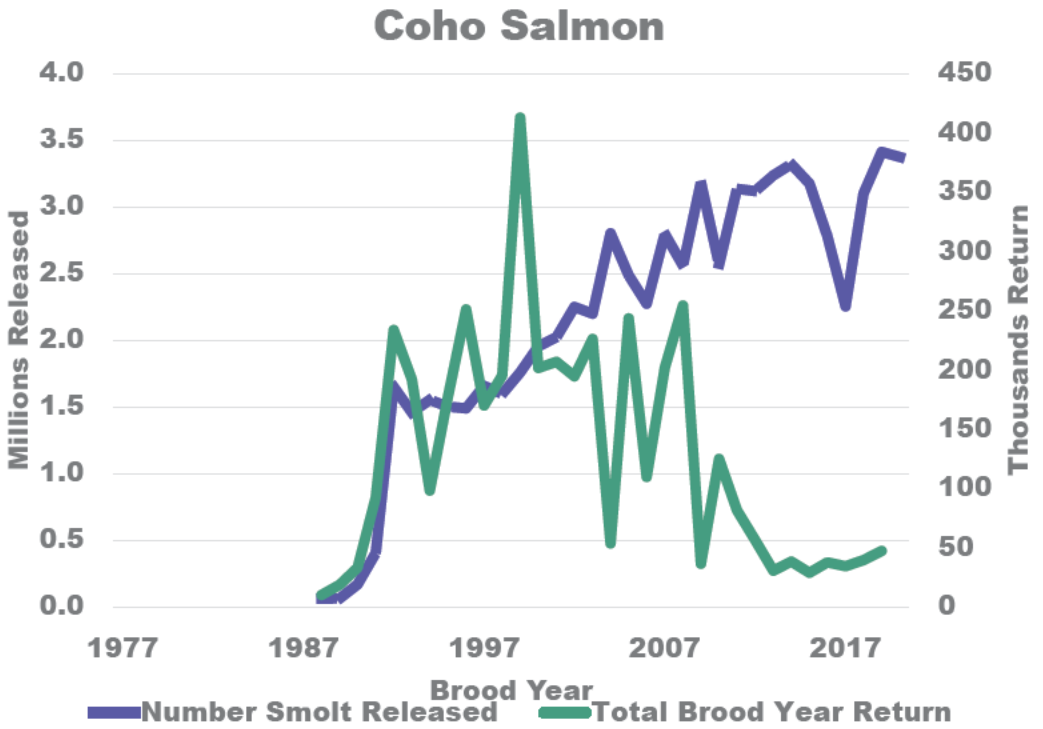
- A pattern?
  - Returns Peak

    then
  - Returns highly variable and declining

    and now
  - Challenges meeting Brood Stock and Cost Recovery goals

    despite
  - Huge Releases

(Source: www.adfg.Alaska.gov)



Hidden Falls Hatchery Chinook
Boom and Bust

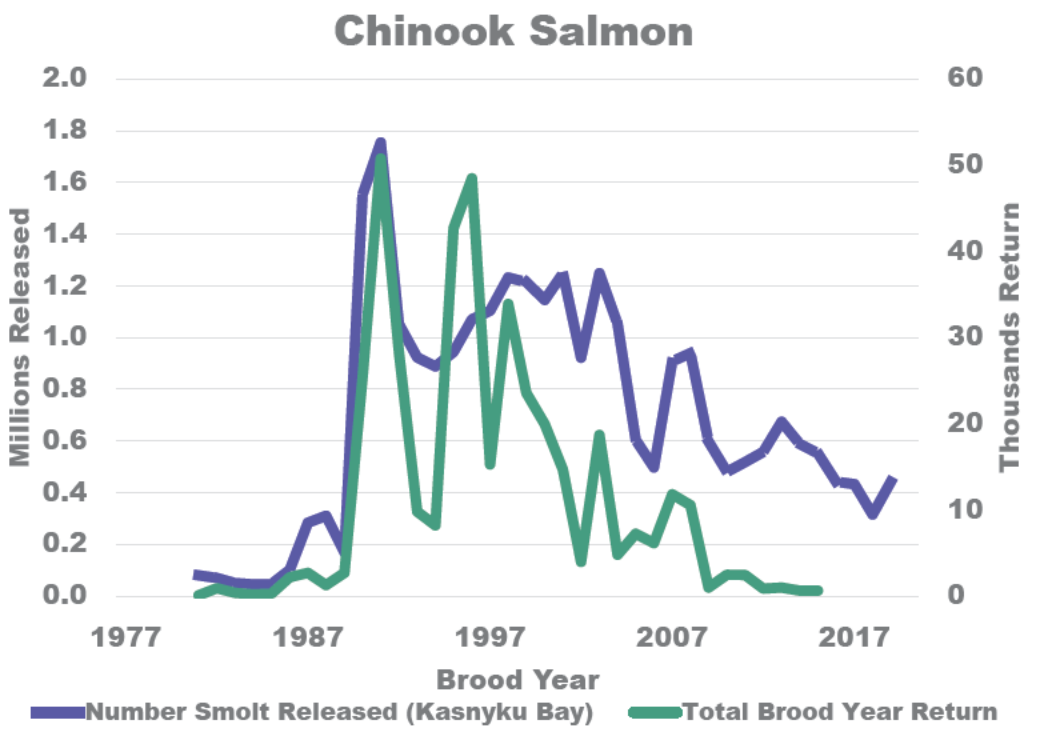
- A pattern?
  - Returns Peak

    then
  - Returns highly variable and declining

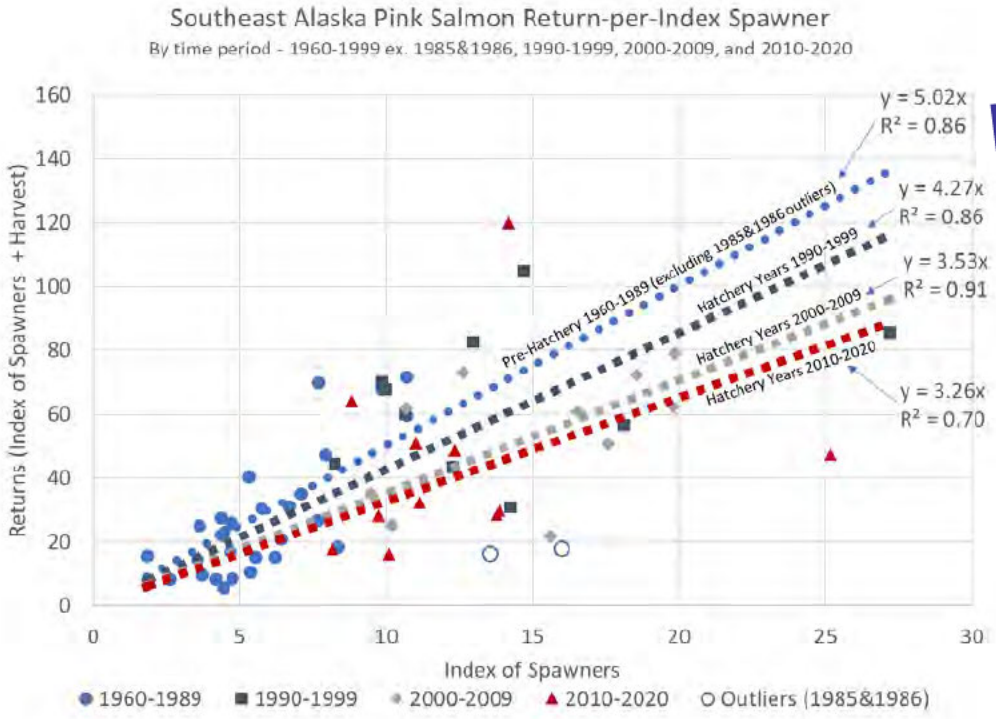
    and now
  - Challenges meeting Brood Stock and Cost Recovery goals

    despite
  - Huge Releases

(Source: www.adfg.Alaska.gov)



SEAK Pink Return-per-Spawner
post-hatchery decline in productivity?

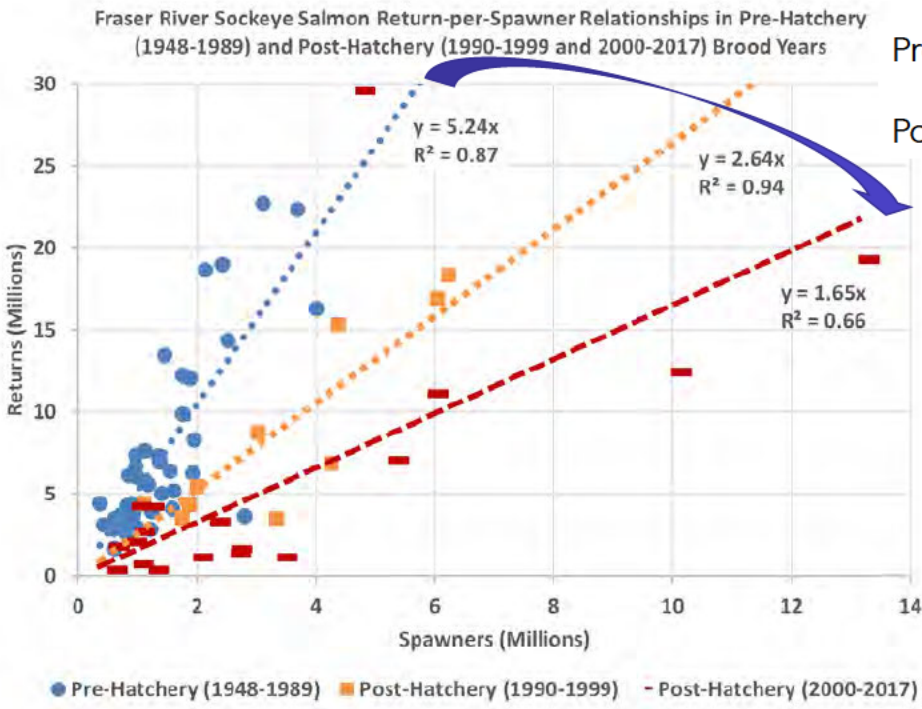


Pre-Hatchery to Post-Hatchery?

Supplement or ✓ Supplant?

(Data source: ADFG, February 2023)

Fraser R. Sockeye Return-per-Spawner
huge post-hatchery decline in productivity

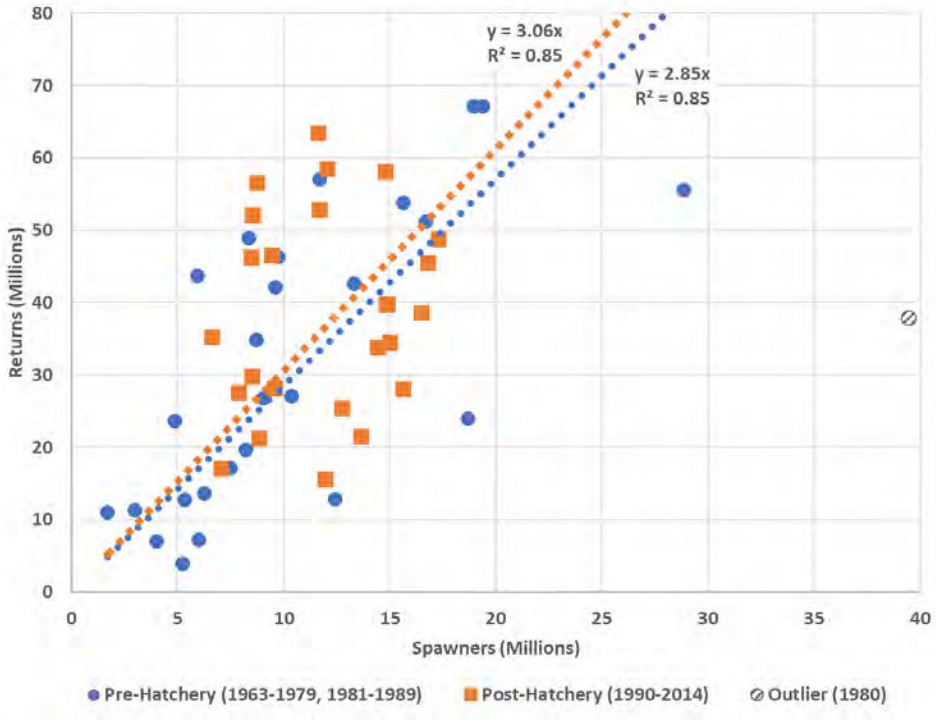


Pre-Hatchery to Post-Hatchery

Supplement or ✓ Supplant?

(Data source: Pacific Salmon Commission, February 2023)

Bristol Bay Sockeye Return-per-Spawner
no hatcheries and no post-hatchery decline (ex. 1980 outlier)



Data source: ADFG, February 2023

Sad sustainability

- Fisheries – always needing another stock to exploit
- Hatchery – always needing another bay to exploit
- Humans – always flushing nutrients out of the nutrient cycle

Anybody want to Save the World and be an Effluentologist when they grow up?

Must run that biogeochemical cycle!

Industrial Fisheries - don't assume the ocean is?

- Too complicated
- There for the taking
- Sustained by propellers

Industrial Hatchery/Mariculture - don't assume the ocean is?

- Unlimited
- Open for immigrants
- Sustained by money

Biogeochemically balanced until...
us technocrats prove there *is* 'No Free Lunch'

Fossil fuels -> human population explosion -> and the big Ecological Overshoot implosion

...a last free *Haiku*...

Technology Kills

Better than Nature?
Ecological Overshoot
Better luck next time

Of all the fishery, climate, and money woes we have,
… at least we have full control over hatchery woes!

Submitted by: Keenan Vonbirgelen
Community of Residence: Anchorage

Proposition 167

I am in support of prop 167. The state doesn't count our coho. The bait use in the upper river is detrimental to our resident rainbow trout and the dwindling coho stock. The high grading or filtering through inedible colored up staging coho to find your limit of table fair coho. The bycatch of rainbow trout with bait mortally wounds fish. Removal of bait will drastically reduce mortality of trout and our staging coho

Proposal 167: Support

Submitted by: DAVOD VOUGHT
Community of Residence: SOLDOTNA, ALASKA
SEE ATTACHED

[NO ATTACHMENT UPLOADED]

PC225

Submitted by: Parker Wallace
Community of Residence: Healy

Commenting on behalf of proposal 29:

I support this action, as someone who has enjoyed these road accessible fisheries for years I think it is of a good conservation mindset to limit the pressure on steelhead once they've surpassed a certain point. As stated the helicopter access is putting unnecessary stress on wintering fish that would otherwise simply not receive it. Therefore to further protect and preserve our precious native fish stocks, I see it only right to abolish the use of helicopter for commercial use on the lower Kenai Peninsula streams. It is exploiting a finite resource that will not handle the increase in stress and strain on the population, which is already compromised from historical numbers.

Due to the arc and trajectory of the fisheries up and down the Pacific Northwest in the last several decades I often wonder at our practices here in Alaska. Do we not want the same opportunities for our children and grandchildren that we have been afforded? I see them disappearing in my short lifetime and I believe it important to stand behind measures such as this.

It is not about more fish for one group or another but simply putting a stop to exploitation of vulnerable fish easily accessible in small water tributaries that would otherwise see mostly safe passage. The pressure in the areas mentioned is minimal at best without the commercial use of helicopters to access it. I believe it best left that way to ensure strong returns of steelhead on the Kenai Peninsula for generations to come.

Sincerely,

Parker Wallace

PC226

Submitted by: Michelle White
Community of Residence: Girdwood, Alaska

We need to protect our resident fish in this area of the Kenai. Trout species that are being caught with bait anglers during coho season are at risk and should be evaluated. This area of conversation (prop167) should be made no bait, artificial lure or flies only, single hook and size of the hook should be evaluated also. This is an important issue as I have first hand seen large trout caught and mishandled by salmon fisherman. We need to protect this fishery so it can be experienced for years to come.

Proposal 167: Support

PC227

Submitted by: Nathaniel Wilder
Community of Residence: Anchorage, AK

hello,

I am commenting in support of proposal 83. We need to be taking a much more conservative start to the late-run of king salmon coming into the inlet. Lowering the optimal escapement goal is counterintuitive to the survival of a salmon population with 4 years of low returns into its 7 year cycle. The sacrifice this population in favor of commercial and set-net interests is another chink in the armor of the existence of the king salmon in the state of Alaska. We have time to turn this around if we consider conservation before other interests. If the kings show

up in acceptable numbers after the OEG is reached, then commercial and set-net can be allowed. But a reasonable OEG like 30k returning fish is more realistic to the survival of the king population this river. Thanks for considering.

Proposal 83: Support

PC228

Submitted by: Jake Wise
Community of Residence: Homer

Good day,

I am a 3 rd generation sport and commercial fisherman. I am opposing proposal 43 for hatchery reduction in releases. Alaska department of fish and game has done a superb job at managing fisheries for the wild salmon escapement and returns i have seen record runs for wild salmon be broken several times in the last 10 years.

Proposal 43: Oppose

February 5, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I'm a commercial fisherman out of Homer, and I reside in Nikolaevsk. Salmon hatcheries play a major part of resources for salmon producers and any reduction in output of hatcheries will be a huge devastation to the fishing communities.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Sergey Yakunin
[redacted]@[redacted]
Nikolaevsk/Homer, Alaska

Submitted by: Dennis Zadra
Community of Residence: Cordova, Alaska

These are my personal comments and not affiliated with any group or organization. I am adamantly opposed to Proposal 43 as our salmon hatcheries are a vital part of all salmon fisheries. I am very concerned about Amendment 16 to the Cook Inlet FMP and the implications that it brings. We would not be in this position if the Department of Fish and Game managed on the requirements of the Magnuson-Stevens Act. They do not. Managing for sustainability is not the same as Managing for MSY. With salmon fisheries the science is clear, both overfishing (too much harvest) and underfishing

(too little harvest) can jeopardize the capacity of a stock or stock complex to produce MSY on a continuing basis. The State's reallocation of the salmon resources to the PU fishery have created an environment where it is very difficult to manage to MSY. I am deeply concerned about the letter that the Commissioner presented to this Board in October asking to give him blanket authority to close down any State waters to commercial longlining for rockfish conservation. SB 209 speaks to the same mentality to allow blanket authority to place electronic monitoring on any vessel they choose. It is never a good thing when fisheries are managed on politics instead of biology. Thank you for listening to my point of view.

Proposal 43: Oppose

Submitted by: Phil Zander
Community of Residence: Kenai ak

On the opinion that hatchery fish aren't detrimental to wild salmon. Have you ignored all the research done by the state of Washington. Working at the hatcheries myself I saw first hand what a hatchery can do to a wild salmon population. Talk about taking away the survival of the fittest model. Once you start a hatchery for a fishery you will never have the original wild stock ever again. Ever. Plain and simple