

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 continuously exceeds its escapement 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

Submitted by: Carrie Hollier
Community of Residence: Kenai, Ak

Hello Members of Alaska Board of Fish,

I am a life long resident of Kenai. I hold two Cook Inlet set net permits. I also operate a set net buying station for OBI seafoods. 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, within 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 traditionally 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 composition in the 600 ft fishery on NKB, showed Kasilof 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 management 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 July 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
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 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 generic statement. Any opener, in any fishery will increase salmon harvest! That is why there are "openers".....to harvest salmon of an unknown quantity.

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 prevalent 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 oversight 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 Composition 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 DOAI

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.

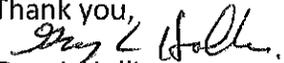
The OEG for Large King Salmon to the Kenai River is unattainable. In this PC, I have included some papers, which explain some reasons why this is.

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, ($\alpha = 3.5$; Table 6) than the early-run stock ($\alpha = 5.5$; 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.**

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

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

...for leaving their natal rivers. Vincent-Lang said there is a solid

“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,

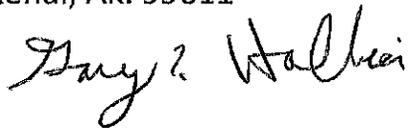
I am submitting a PC to support proposal 128, which I submitted. I will submit some pages that will be numbered.

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 **composition** 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



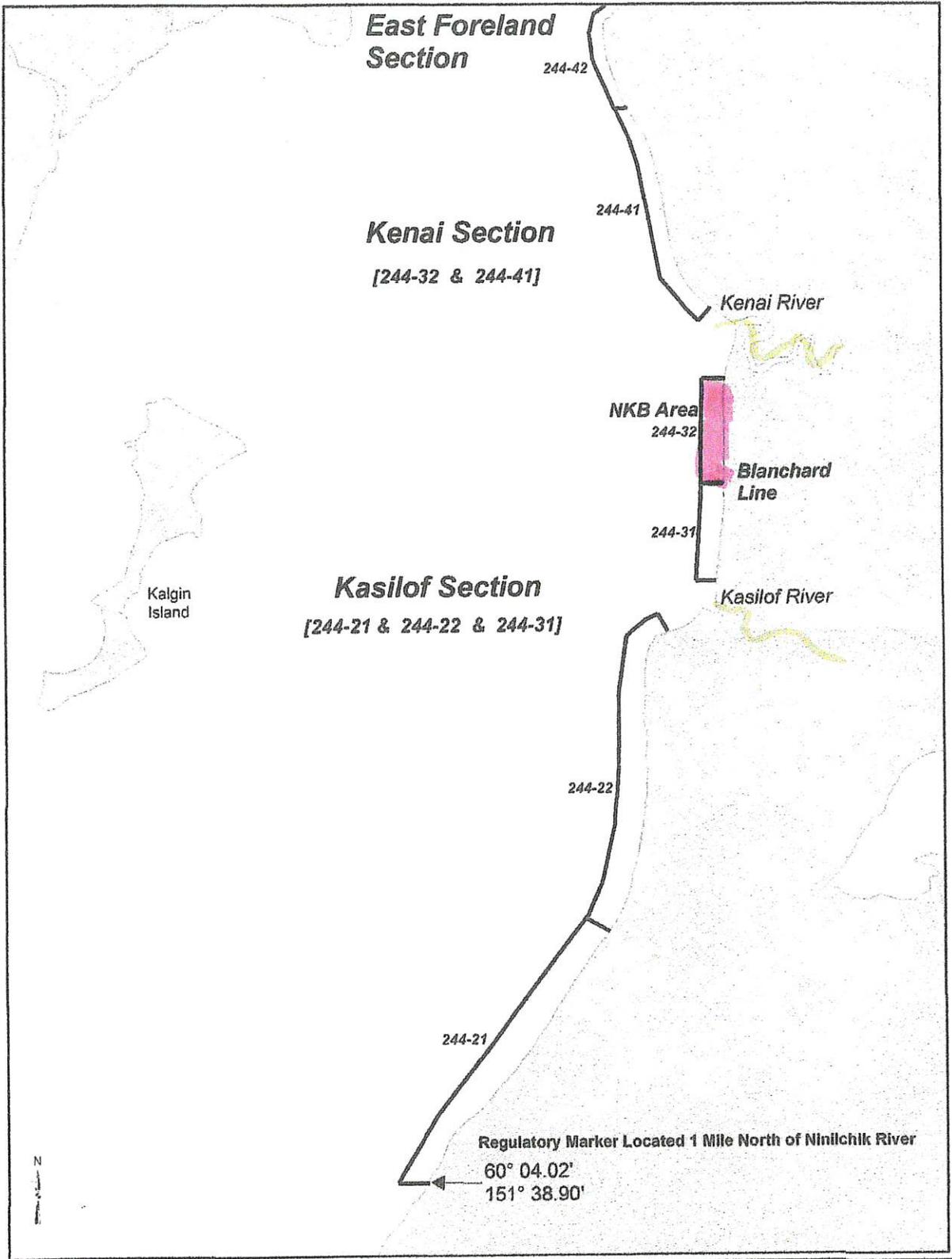


Figure 183-1.—Map of the Upper Subdistrict set gillnet fishery, which includes the Kasilof, Kenai, and East Foreland sections.

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 Kalifornsky Beach - 244-32-600ft Fishery

~~32, 4~~

~~Before 7/1~~

W

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

Date Fishing Began (MM/DD)	420	
	Number Of Animals (sum) 2020	Number Of Animals (sum) 2021
07/01		
07/02		1,897
07/03		
07/04		684
07/05		
07/06		2,260
07/07		1,796
07/08		629
07/14		
07/15		
07/16		2,275
07/17		
07/18		
07/19		
07/20		3,460
		2,162
		3,072
		3,110
		2,243
		2,728
		2,942
		3,216

All Sockeye Harvested in 600ft Fishery NKB- } 2020
 } 2,484 } 2021
 } 26,120 } 2022
 All Sockeye Harvested prior to 7/8 - NKB 600ft - } 2020
 } 32,484 } 2021
 } 3,248 sockeye/King } 2020
 } 6,497 sockeye/per large King } 2021
 } 2022

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.

Year	Size			Total Reported Harvest
	Small	Large	Total	
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)								
Reporting group	Stock composition (<i>n</i> = 371)				Harvest = 274,412			
	Mean	90% CI			Mean	90% CI		
		5%	95%	SD		5%	95%	SD
<i>Crescent</i>	0.1	0.0	0.4	0.2	207	0	1,155	570
<i>West</i>	0.3	0.0	1.8	0.7	902	0	4,808	1,878
<i>JCL</i>	1.1	0.0	2.5	0.8	2,899	28	6,886	2,159
<i>SusYen</i>	0.7	0.0	3.1	1.1	1,867	0	8,539	2,959
<i>Fish</i>	3.0	1.0	5.4	1.4	8,122	2,777	14,806	3,737
<i>KTNE</i>	1.9	0.6	3.8	1.0	5,335	1,678	10,442	2,797
<i>Kenai</i>	50.3	44.5	56.5	3.7	137,947	122,088	154,944	10,086
<i>Kasilof</i>	42.7	36.8	48.4	3.5	117,134	100,969	132,704	9,648

Kasilof Section 600 ft ^a								
Reporting group	Stock composition (<i>n</i> = 366)				Harvest = 7,765			
	Mean	90% CI			Mean	90% CI		
		5%	95%	SD		5%	95%	SD
<i>Crescent</i>	0.5	0.0	2.3	0.8	40	0	180	64
<i>West</i>	0.5	0.0	2.2	0.8	41	0	174	66
<i>JCL</i>	0.4	0.0	1.4	0.5	30	0	108	37
<i>SusYen</i>	0.4	0.0	1.9	0.8	31	0	151	63
<i>Fish</i>	3.9	1.9	6.2	1.3	300	150	483	99
<i>KTNE</i>	1.1	0.1	2.9	0.9	87	11	228	72
<i>Kenai</i>	56.7	51.3	62.0	3.2	4,405	3,983	4,817	251
<i>Kasilof</i>	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 600 ft Ashley

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

Reporting Group	Stock Composition (<i>n</i> = 347)				Harvest = 741,865			
	90% CI				90% CI			
	Mean	5%	95%	SD	Mean	5%	95%	SD
<i>Crescent</i>	0.5	0.0	2.4	0.9	3,382	0	18,062	6,800
<i>West</i>	1.2	0.0	4.3	1.6	8,870	0	31,963	11,515
<i>JCL</i>	0.3	0.0	1.0	0.4	2,024	0	7,675	2,845
<i>SusYen</i>	0.1	0.0	0.8	0.4	1,008	0	6,150	2,846
<i>Fish</i>	0.4	0.0	1.8	0.6	3,200	0	13,003	4,564
<i>KTNE</i>	1.0	0.0	3.2	1.1	7,300	0	23,728	8,156
<i>Kenai</i>	85.7	80.6	90.2	3.0	635,475	597,751	669,382	22,509
<i>Kasilof</i>	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

Reporting Group	Stock Composition (<i>n</i> = 368)				Harvest = 31,111			
	90% CI				90% CI			
	Mean	5%	95%	SD	Mean	5%	95%	SD
<i>Crescent</i>	0.4	0.0	1.8	0.7	121	0	574	206
<i>West</i>	1.3	0.0	5.9	2.0	390	0	1,845	620
<i>JCL</i>	0.1	0.0	0.8	0.3	43	0	243	102
<i>SusYen</i>	8.3	4.5	12.6	2.5	2,598	1,390	3,930	771
<i>Fish</i>	0.9	0.1	2.3	0.7	283	16	703	218
<i>KTNE</i>	0.8	0.0	3.1	1.1	247	0	958	331
<i>Kenai</i>	60.9	54.7	67.0	3.8	18,942	17,023	20,830	1,169
<i>Kasilof</i>	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

Reporting Group	Stock Composition (<i>n</i> = 367)				Harvest = 11,303			
	90% CI				90% CI			
	Mean	5%	95%	SD	Mean	5%	95%	SD
<i>Crescent</i>	0.7	0.0	2.9	1.0	80	0	326	112
<i>West</i>	1.1	0.0	5.5	1.9	129	0	627	215
<i>JCL</i>	0.1	0.0	0.7	0.3	14	0	79	32
<i>SusYen</i>	0.3	0.0	1.6	0.6	37	0	181	70
<i>Fish</i>	0.2	0.0	0.9	0.4	19	0	107	40
<i>KTNE</i>	1.9	0.0	4.6	1.5	210	0	524	175
<i>Kenai</i>	36.2	30.9	41.4	3.2	4,086	3,496	4,685	361
<i>Kasilof</i>	59.5	54.3	64.5	3.2	6,727	6,136	7,295	359

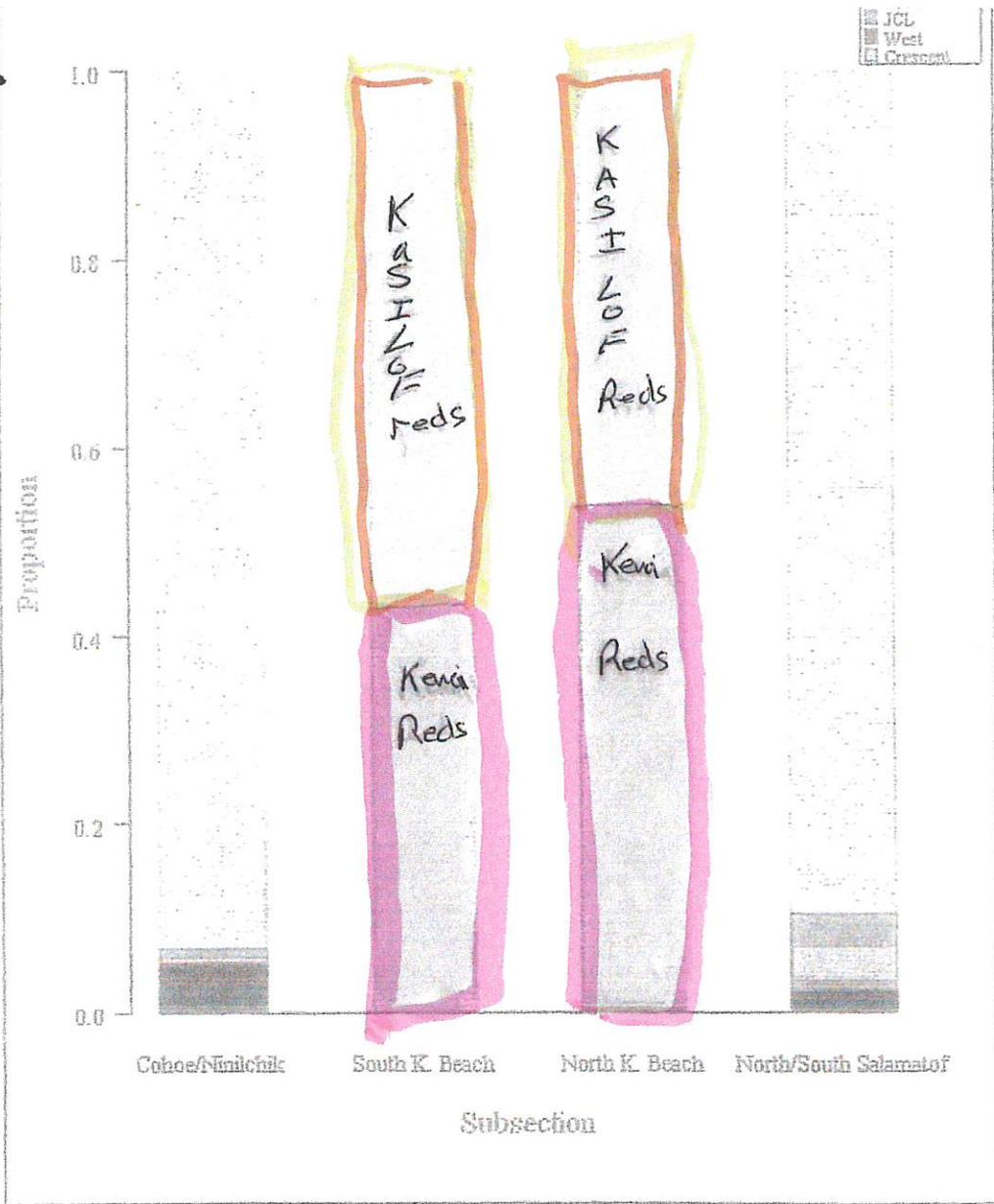
Note: The 90% credibility intervals of harvest estimates may not include the point estimate for the very low harvest estimates.

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.

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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

Gail Hollister
 Proposal 128

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Well, it seemed we reviewed those numbers and found them to be accurate to best of our knowledge. Okay, great. Thank you. 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 Ruttner at the 2019 March State wide meeting.

The discussion was about what his and the BOF's Intent on fishing

North K-Beach 600ft Fishery. Member Ruttner asked the Department if all data submitted in the support of this issue was accurate? In yellow was the Department's Response.

MR. Ruttner went on to state that 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

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		

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-Pellegroni

Community of Residence: Kenai

I fully support proposal 128.

Thank you

Sarah Hollier-Pellegroni

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



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.

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,

Mary Howarth-Hernandez

██████████@██████████

Sterling, Alaska

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	Proposal 202: Support	Proposal 203: Oppose

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



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

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 horsepower 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 participant 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

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

██████████@██████████

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.

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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- (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,
Eli Johnson



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 PPMC 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

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 Magnuson-Steve's Act big-time to save Alaska's kings. Alaska has "allegedly" figured out how to manage its kings but the Magnuson 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

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 Proposal 83: 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

Proposal 110: Oppose
Proposal 114: Oppose
Proposal 118: Oppose
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Proposal 209: Oppose
Proposal 213: Oppose
Proposal 217: Oppose
Proposal 221: Oppose
Proposal 225: Oppose
Proposal 229: Oppose
Proposal 233: Oppose
Proposal 237: Oppose
Proposal 241: Oppose
Proposal 245: Oppose
Proposal 249: Oppose
Proposal 253: 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 anglers 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	

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 #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 183: Oppose

Proposal 180: Oppose

Proposal 181: Oppose

Proposal 182: 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



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.

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 and 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 anglers 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.

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



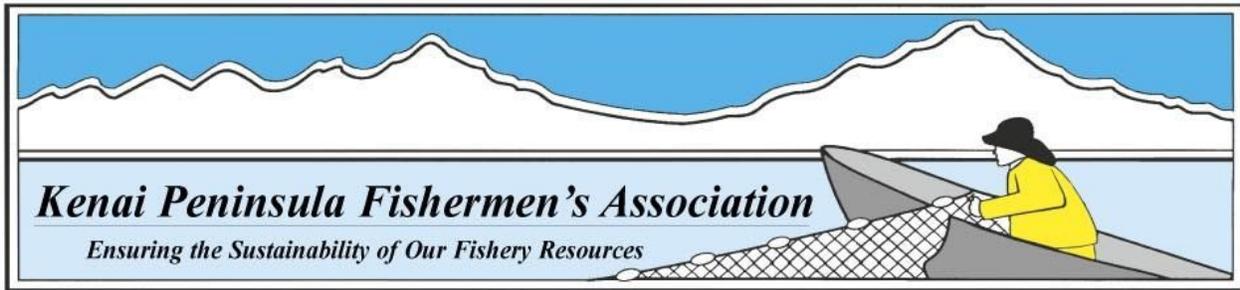
**2024 UPPER COOK INLET
ALASKA BOARD OF FISHERIES**

Kenai Peninsula Fishermen's Association

43961 Kalifornsky Beach Road, Suite F

Soldotna, AK 99611

February 23-March 7, 2024



43961 Kalifornsky Beach Road • Suite F • Soldotna, Alaska 99669-8276
 (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 its 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 non-residents:** *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.

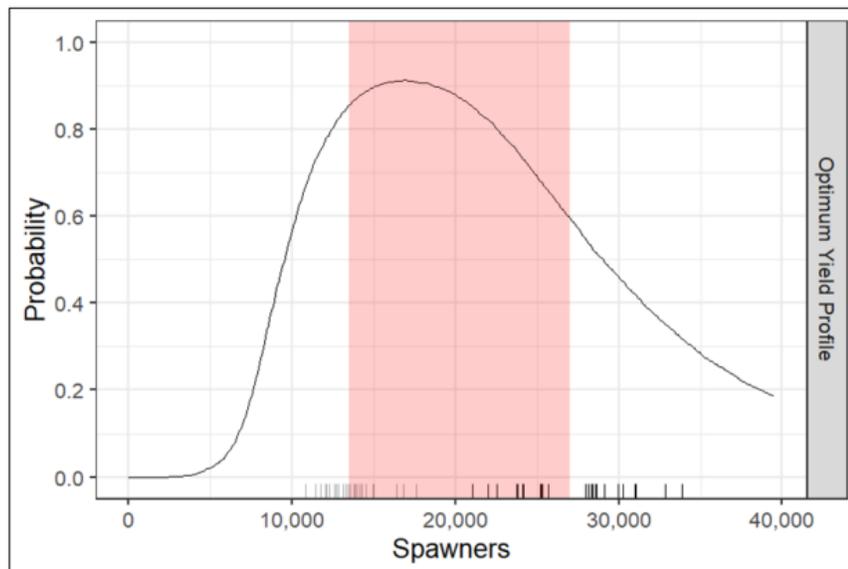


Figure 75-1.— Optimal yield profiles (OYP) plots for Kenai River late-run Chinook salmon 75 cm METF and longer. OYPs show probability that a specified spawning abundance will result in 80% of maximum sustained yield. The goal range shown is the SEG.

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.

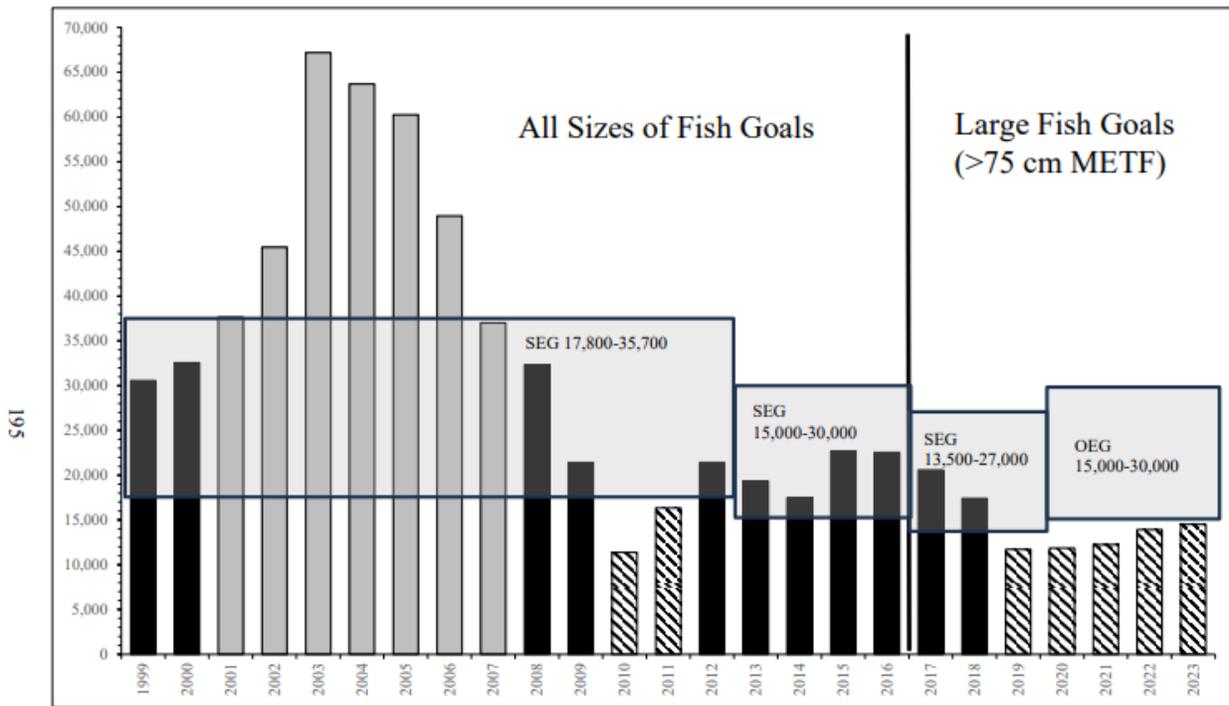


Figure 81-3.–Escapement of Kenai River late-run king salmon, 1999–2023.

Note: METF = mid eye to tail fork length

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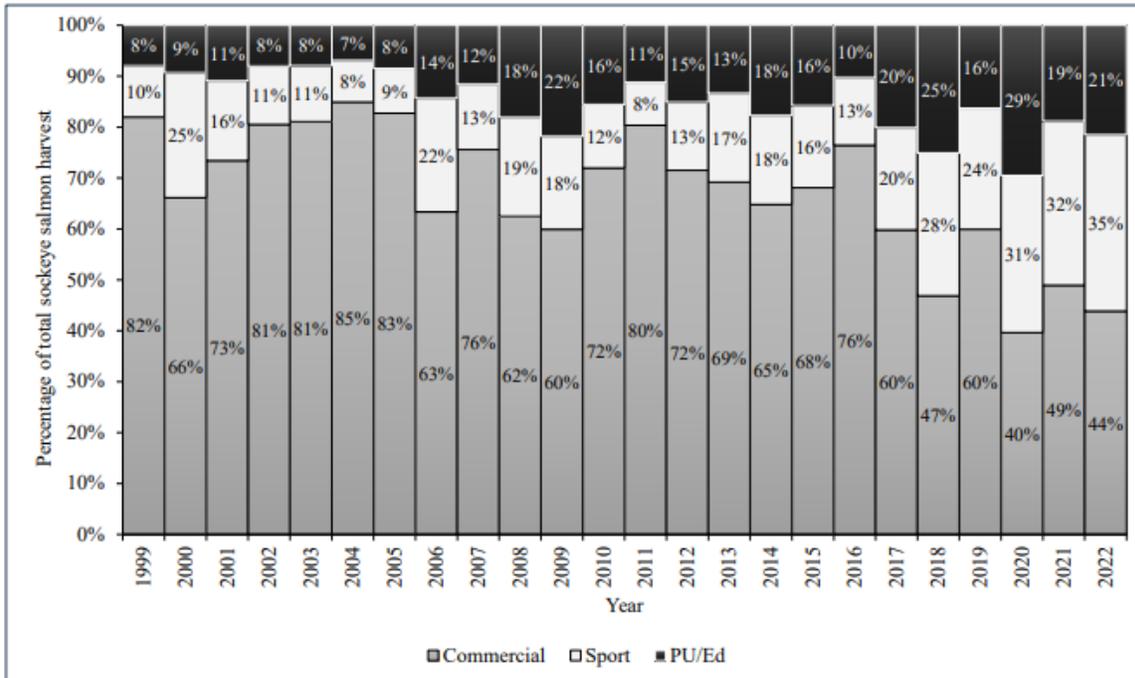


Figure 81-4.—Percentage of total Kenai River late-run sockeye salmon harvest in commercial, sport, personal use fisheries, 1999–2022.

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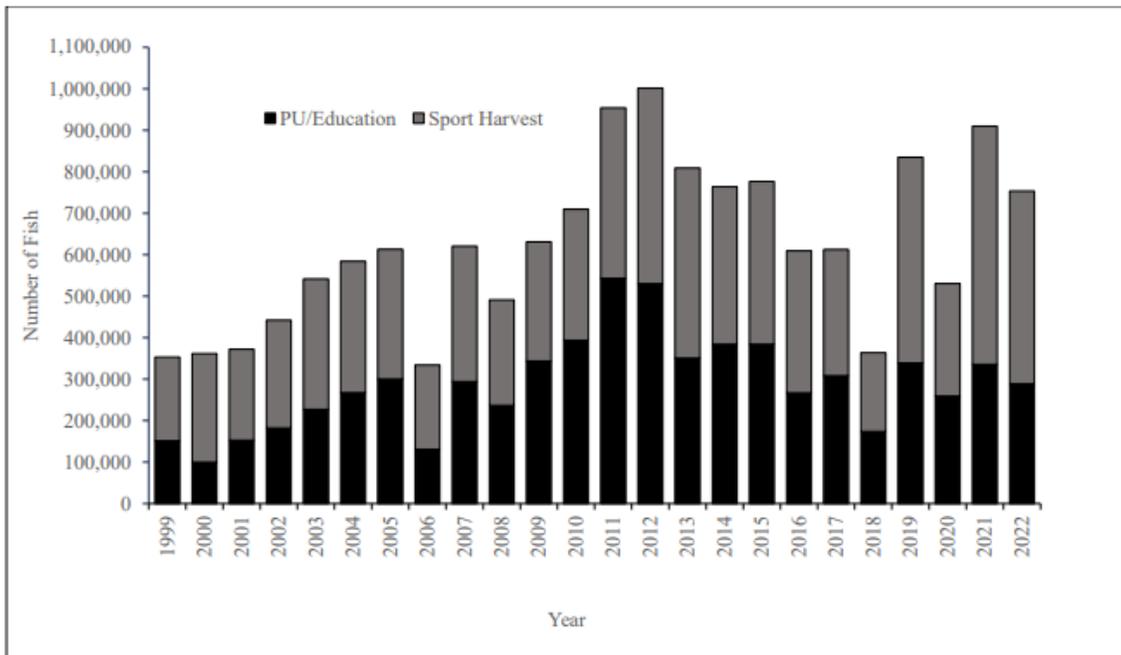


Figure 81-5.—Personal Use (PU)/Education, sport and total inriver harvest of Kenai River late-run sockeye salmon.

Table 112-4.—Estimates of the harvest of Kenai River sockeye salmon in commercial, sport, and personal use fisheries, 1999–2022.

Year	Harvest				% of Total Harvest		
	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 Willets, 2013); 2005–2022 commercial harvest from genetic stock composition analysis (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 KRLRKSMF. 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 KRLRKSMF 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 (KRLRKSMMP).

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 River 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 in-river 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.

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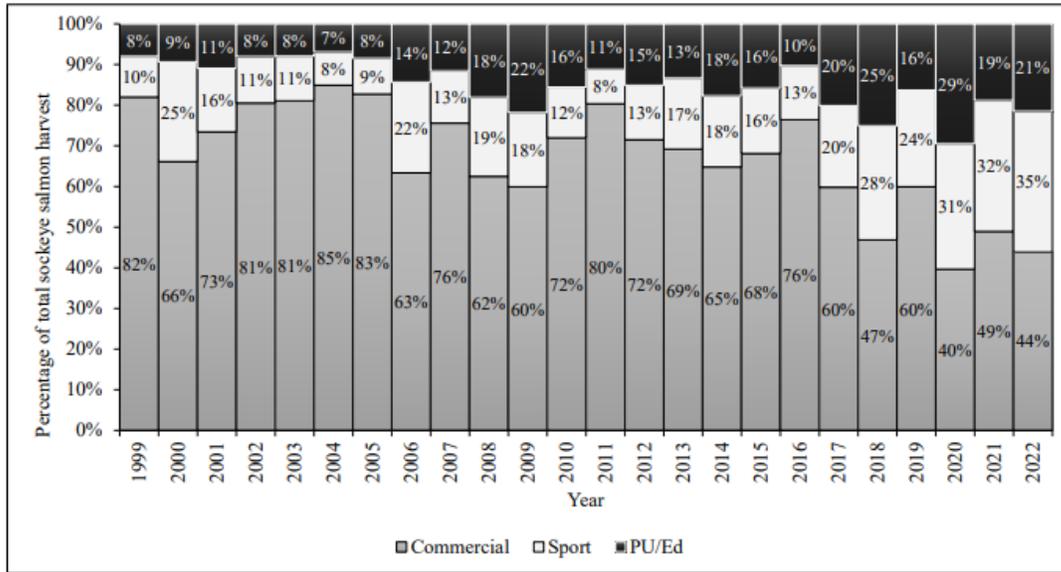


Figure 112-1.—Percentage of total Kenai River late-run sockeye salmon harvest in commercial, sport, personal use fisheries, 1999–2022.

7

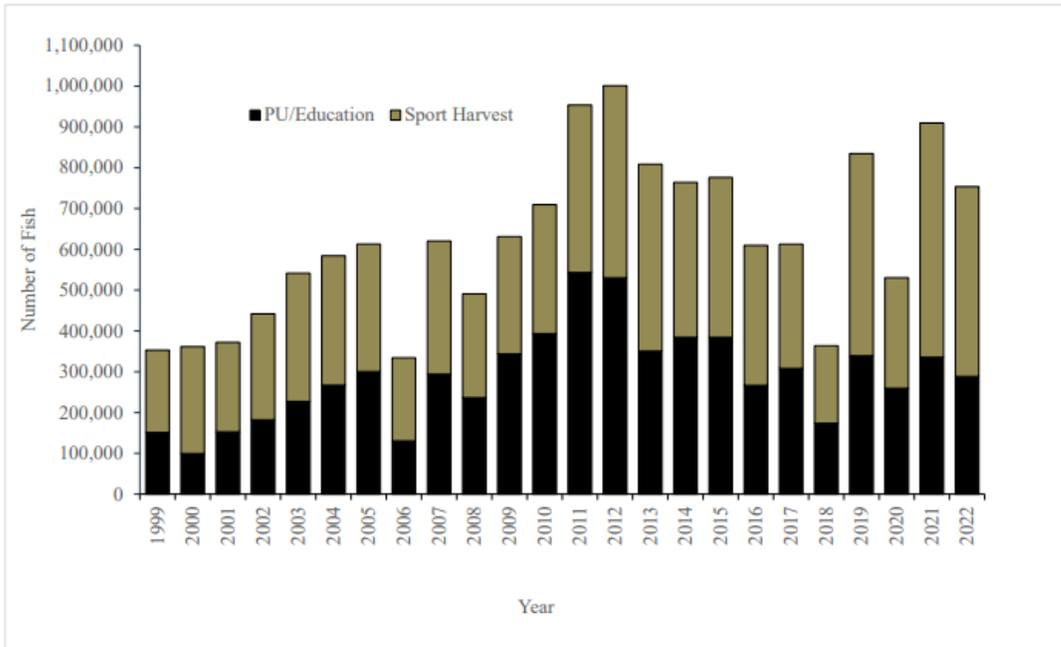


Figure 112-2.—Personal Use/Education (PU), sport and total inriver harvest of Kenai River sockeye salmon.

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

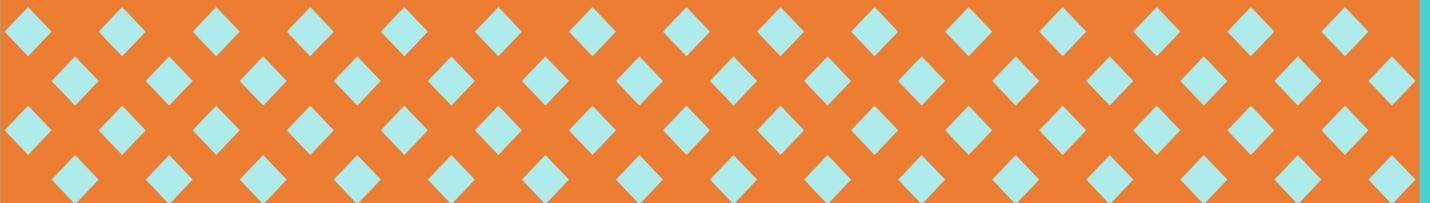
The Kenai Peninsula Fishermen's Association looks forward to discussing the complex elements of the Stock of Concern plan during the Committee of the Whole Group 1: Kenai River Late Run King Salmon Stock of Concern Plan.





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

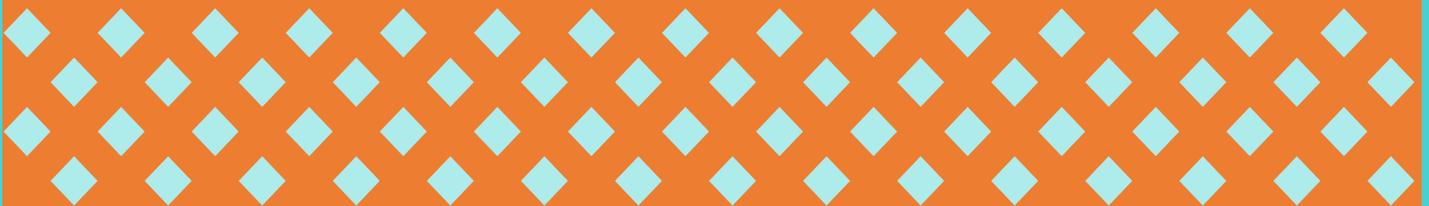




COOK INLET LATE RUN KING SALMON MANAGEMENT PLAN

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 additional 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

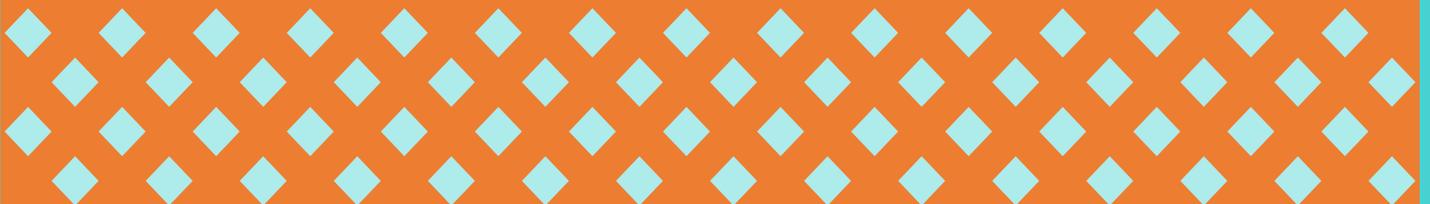
102	5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan. Provide additional commercial salmon fishing opportunity with set gillnet gear in the Upper Subdistrict	Support
103	5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Allow use of dipnets in the Upper Subdistrict commercial 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. Sustainability 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

<p>111</p>	<p>5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt a Kenai River late-run sockeye salmon optimal escapement goal</p>	<p>No Action</p>
<p>112</p>	<p>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</p>	<p>Oppose</p>
<p>113</p>	<p>5AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt an optimal escapement goal for Kenai River late-run sockeye salmon</p>	<p>No Action</p>
<p>114</p>	<p>5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Adopt an Optimal Escapement Goal for Kenai River late-run sockeye salmon</p>	<p>Support</p>
<p>115</p>	<p>5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. Modify intent of the Kenai River Late-Run Sockeye Salmon Management Plan</p>	<p>No Action</p>





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 descendants of the original setnetters are still in our fishery today. These descendants 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

<p>116</p>	<p>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</p>	<p>Support</p>
<p>117</p>	<p>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</p>	<p>Support</p>

PROPOSALS

118-120

<p>118</p>	<p>5AAC 21.365. Kasilof River Salmon Management Plan. Reduce the Kasilof River sockeye salmon optimal escapement goal</p>	<p>No Action</p>
<p>119</p>	<p>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</p>	<p>Support</p>
<p>120</p>	<p>5 AAC 21.365. Kasilof River Salmon Management Plan. Repeal portions of intent language within the Kasilof River Salmon Management Plan</p>	<p>Support</p>



**COOK INLET CENTRAL DRIFT GILLNET
FISHERY MANAGEMENT PLAN**

PROPOSALS 121-127



PROPOSALS

121-127

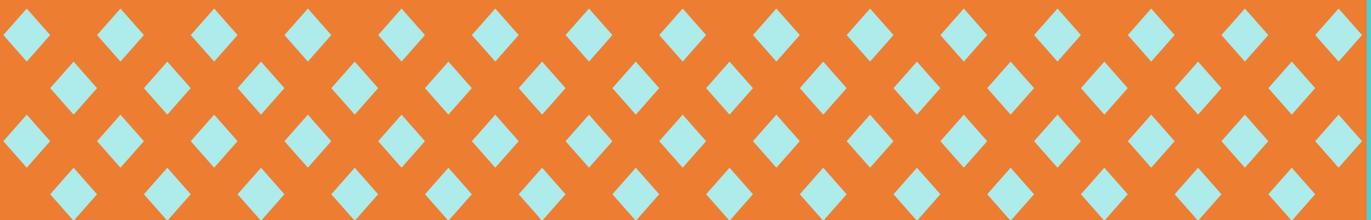
121	5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Modify intent language within the Central District Drift Gillnet Fishery Management Plan	Support
122	5 AAC 21.310. Fishing Seasons; 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal the “one percent rule” 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

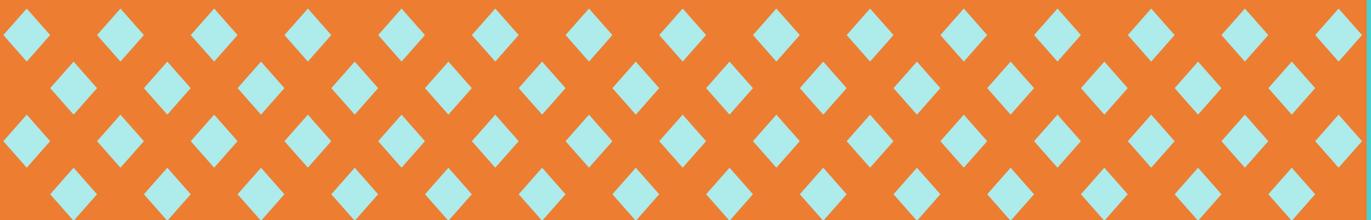
141	Restrict set gillnet gear in the Upper Subdistrict	Oppose
142	5 AAC 21.363. Upper Cook Inlet Salmon Management Plan . Establish new commercial fishery reporting requirements in Upper Cook Inlet a	No Action
143	5 AAC 21.345 Registration. Allow Upper Cook Inlet set gillnet permit holders to fish in 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

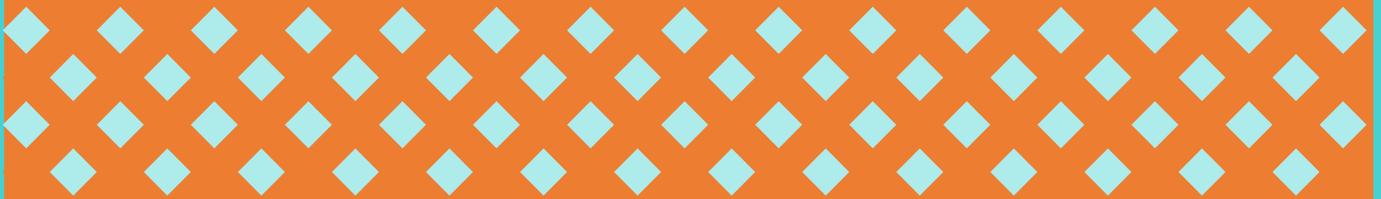
151-152

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

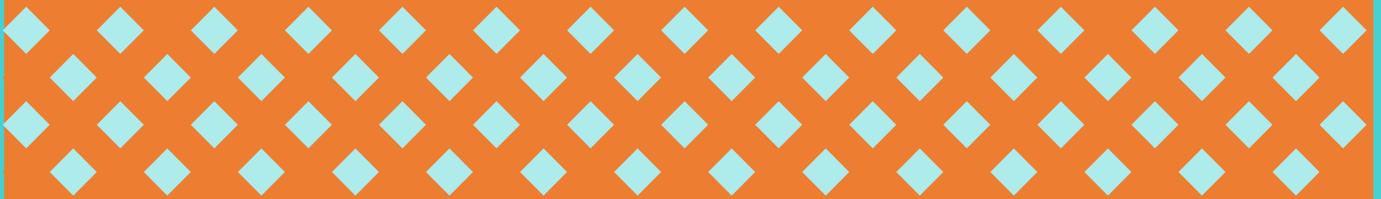
153-164

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 57.121 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 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, single-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

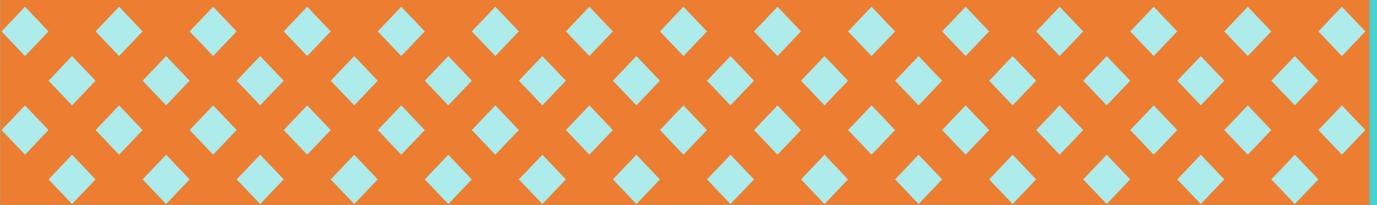
<p>186</p>	<p>5 AAC 56.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Update the stocked lakes list for the Kenai Peninsula Area</p>	<p>Support</p>
<p>187</p>	<p>5 AAC 60.122. Special provisions for the seasons, bag, 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</p>	<p>Support</p>
<p>188</p>	<p>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</p>	<p>No Action</p>





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

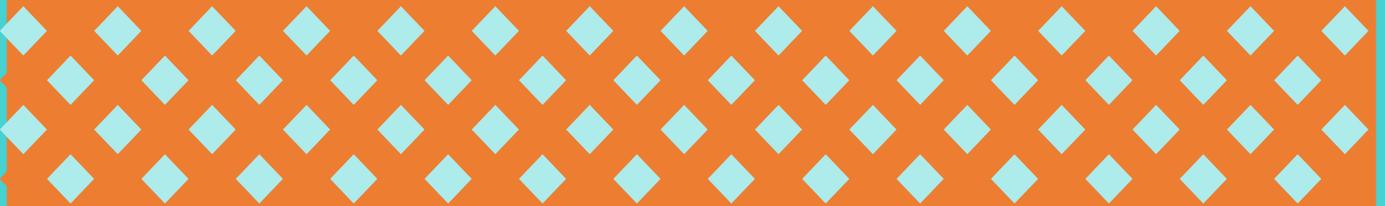
<p>201</p>	<p>5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan. Close the Kenai River personal use fishery when drift fishery is restricted a</p>	<p>No Action</p>
<p>202</p>	<p>5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Reduce the legal mesh size of a set gillnet in the UCI personal use fisheries</p>	<p>No Action</p>
<p>203</p>	<p>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</p>	<p>Oppose</p>
<p>204</p>	<p>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</p>	<p>Oppose</p>





**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 Northern 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. Repeat 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

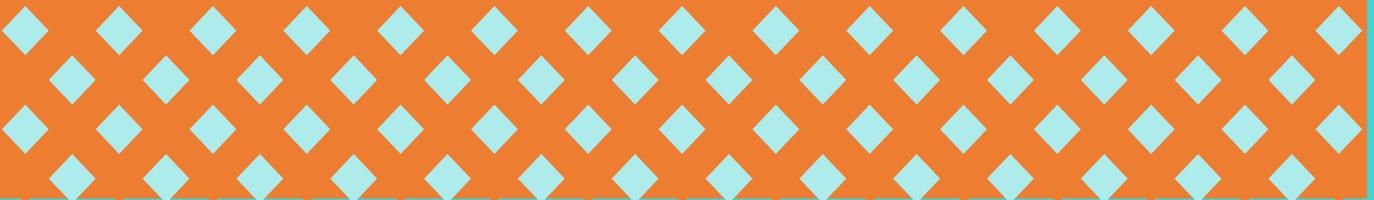
232-233

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

<p>243</p>	<p>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,</p>	<p>No Action</p>
<p>244</p>	<p>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</p>	<p>No Action</p>
<p>244</p>	<p>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</p>	<p>No Action</p>
<p>245</p>	<p>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</p>	<p>No Action</p>
<p>246</p>	<p>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</p>	<p>No Action</p>
<p>247</p>	<p>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</p>	<p>No Action</p>
<p>248</p>	<p>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</p>	<p>No Action</p>
<p>249</p>	<p>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</p>	<p>No Action</p>



**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 Drainages Area 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

Alaska Board of Fisheries Support Staff

Alaska Department of Fish and Game Staff

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Frostad Family Fisheries



Three Generations of the 100 year Frostad Family Legacy



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 KRLRKSMMP.

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 KRLRK SMP.

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 KRLRKSMF.

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 KRLRKSMF.

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 KRLRKSMMP.

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 Salmon 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 statute 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*

“We only support implementation of this proposal when fishing on the Kenai River is closed to King Salmon.”

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 marker 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

Burden 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.

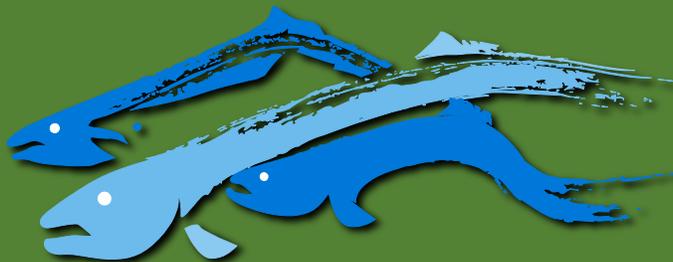
**For questions,
contact us.**

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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.

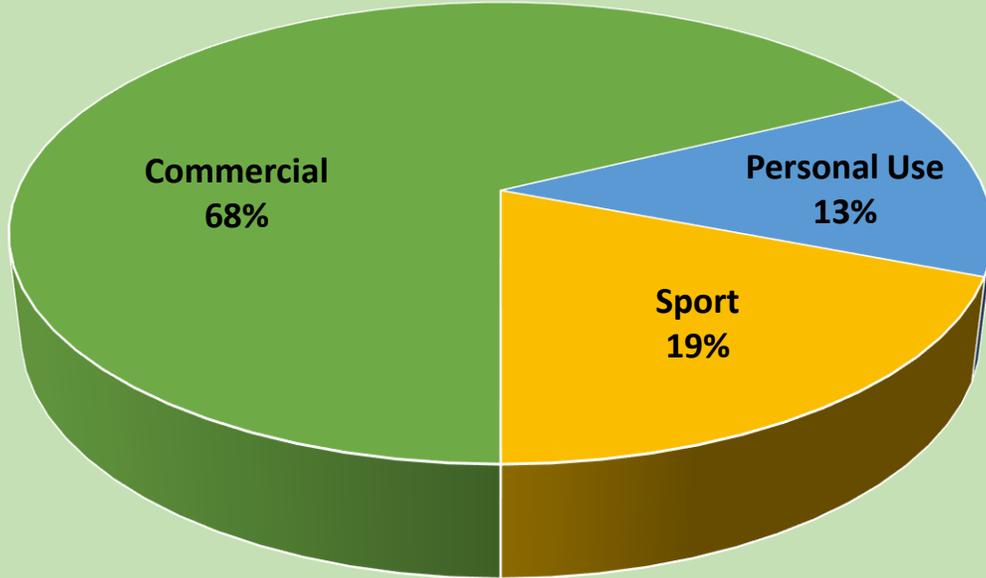
The long dominance of commercial interests has increasingly collided with growing demand by sport and personal use fisheries over the years. Nearly two-thirds of the state's population now lives in the Cook Inlet area. This region now supports the largest public (non-commercial) fisheries in the state, 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.

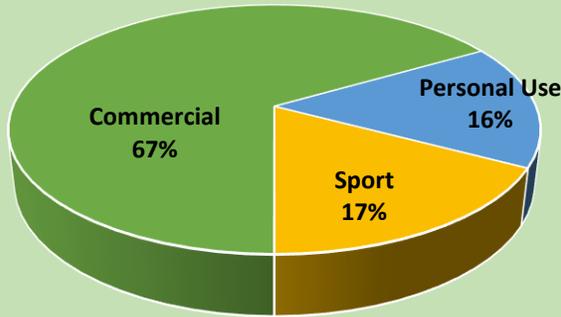


Balancing biological and allocation tradeoffs among many salmon species and runs across diverse fishery interests is a challenging and contentious process at best. Virtually every management decision has both biological and allocation implications. Decisions must also often be made with imperfect knowledge.

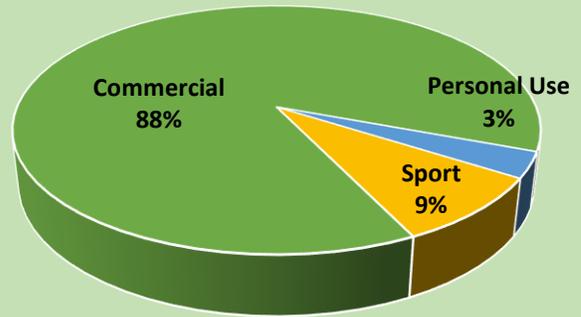
All Upper Cook Inlet Salmon



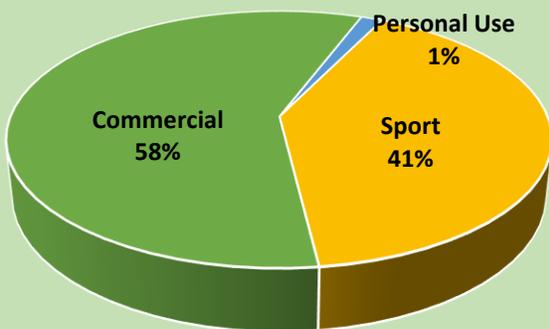
Sockeye 2.7 million / year



Pink & Chum 380,000 / year



Coho 320,000 / year



Chinook 32,000 / year

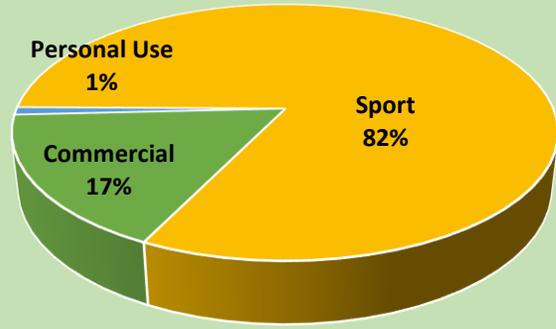


Figure 1. Harvest shares of salmon fishery harvest in Upper Cook Inlet, 2013-2022.

The Mixed Stock Conundrum

Mixed stock fisheries make it practically impossible to meet every escapement goal for each stock all the time

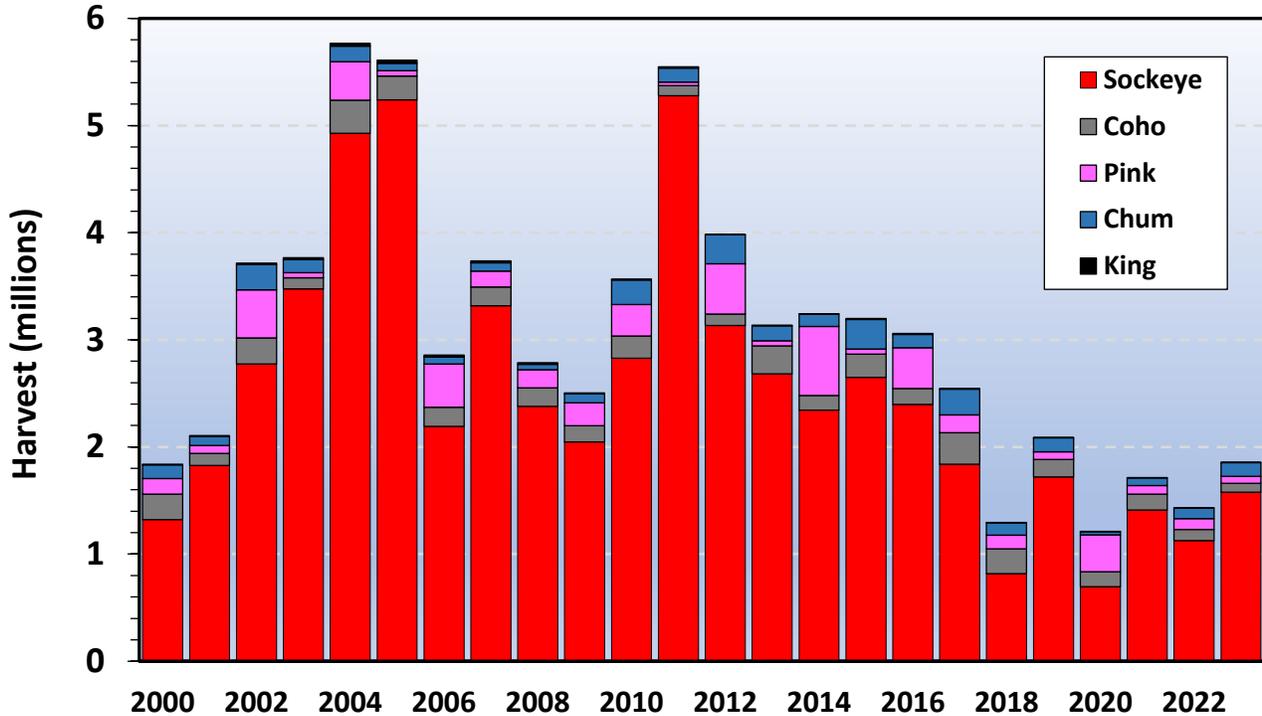


Figure 2. Annual salmon harvest in Upper Cook Inlet commercial fisheries, 2000-2023.

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.

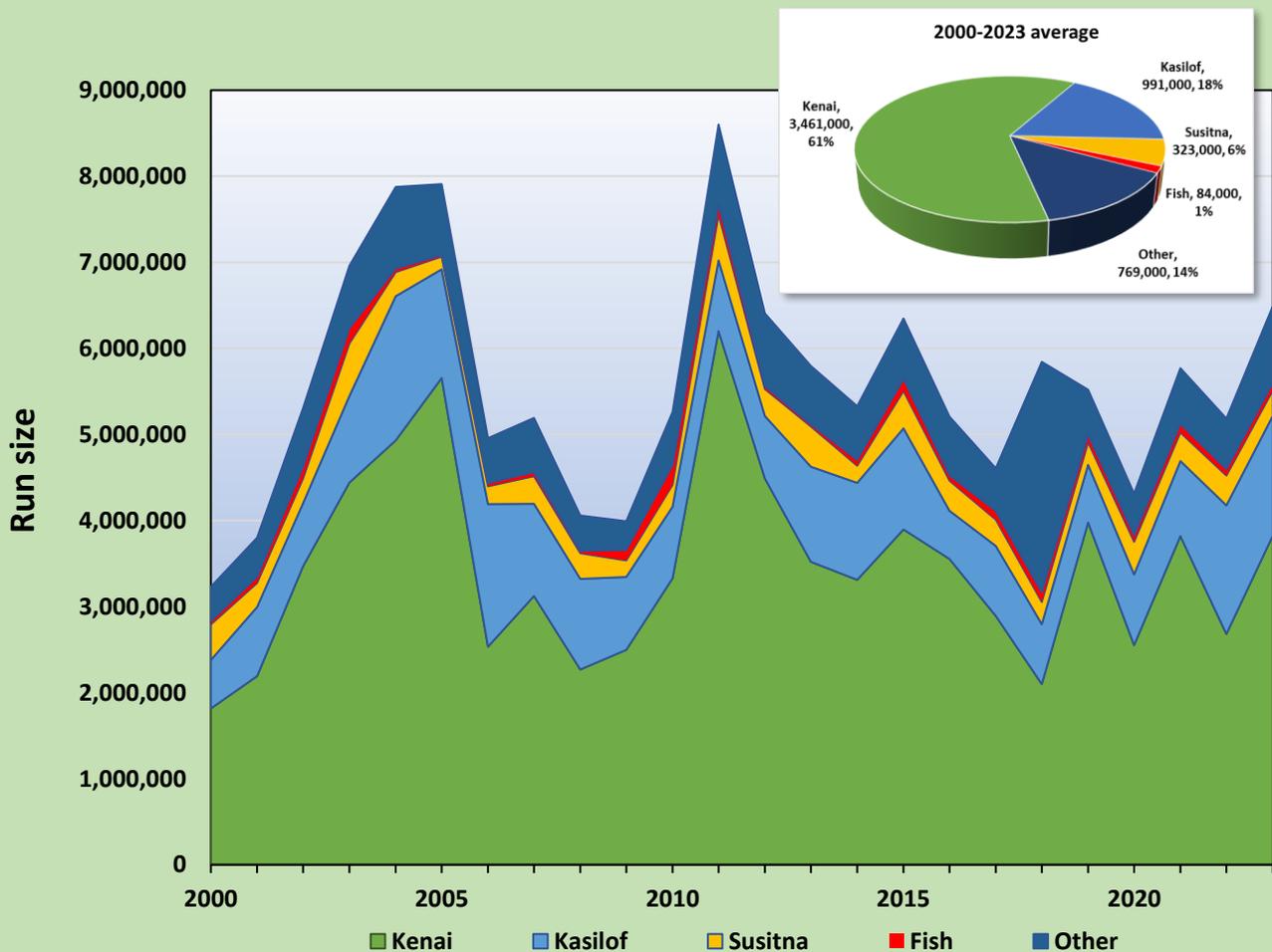


Figure 3. Historical run sizes of Upper Cook Inlet sockeye stocks.

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.

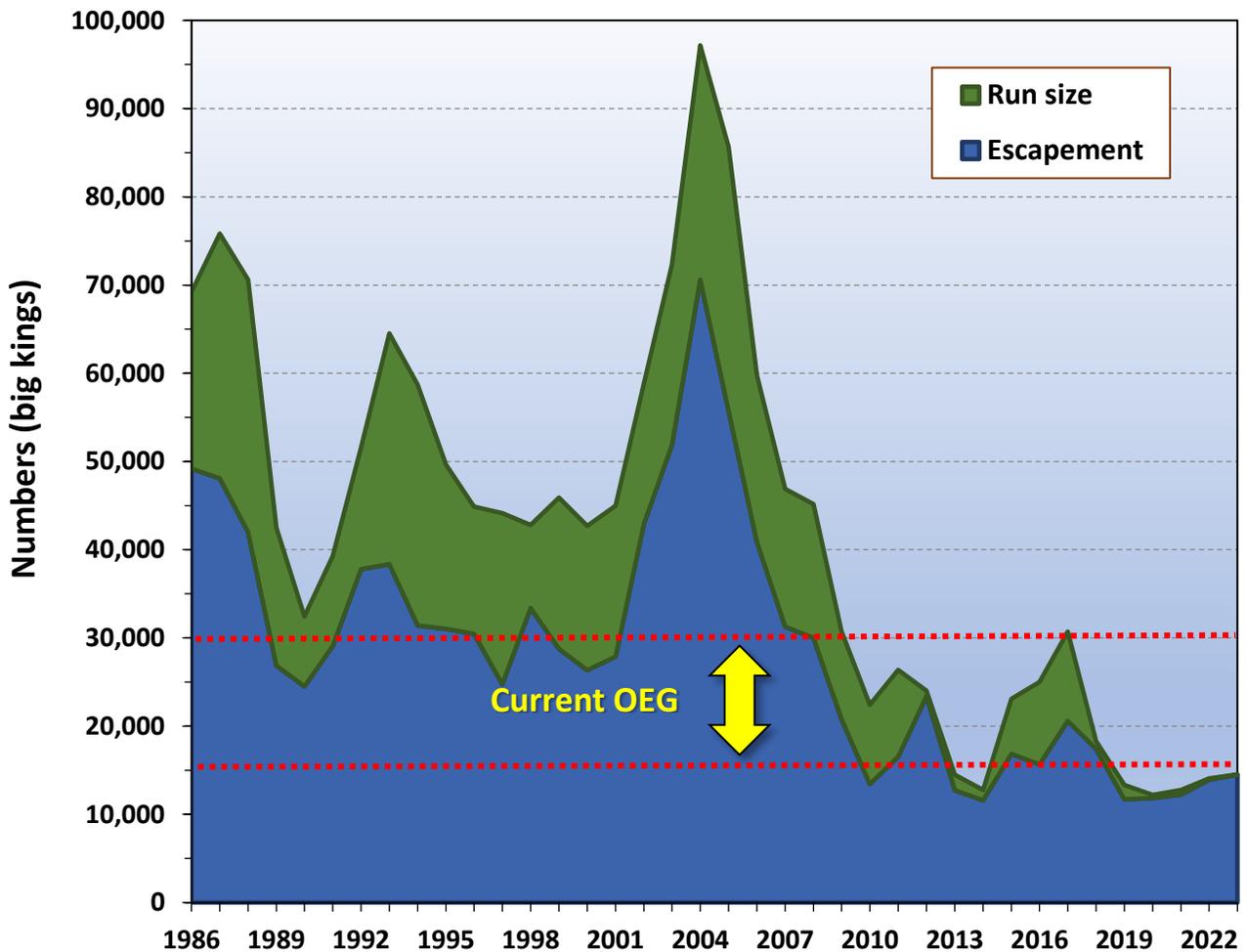


Figure 4. Run size and escapement of large late-run Kenai king salmon relative to the current OEG.

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.

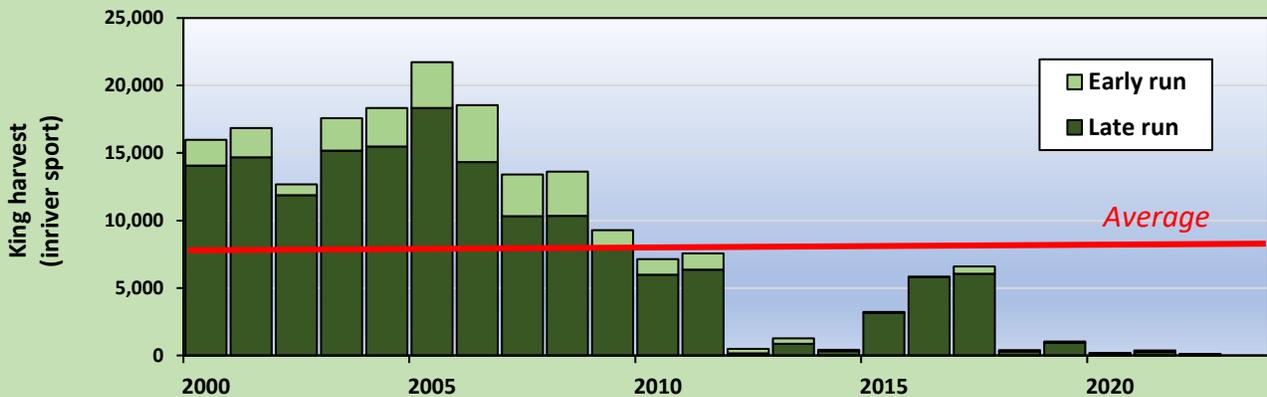


Figure 5. Kenai River king sport harvest (including hook and release mortalities), 2000-2023.

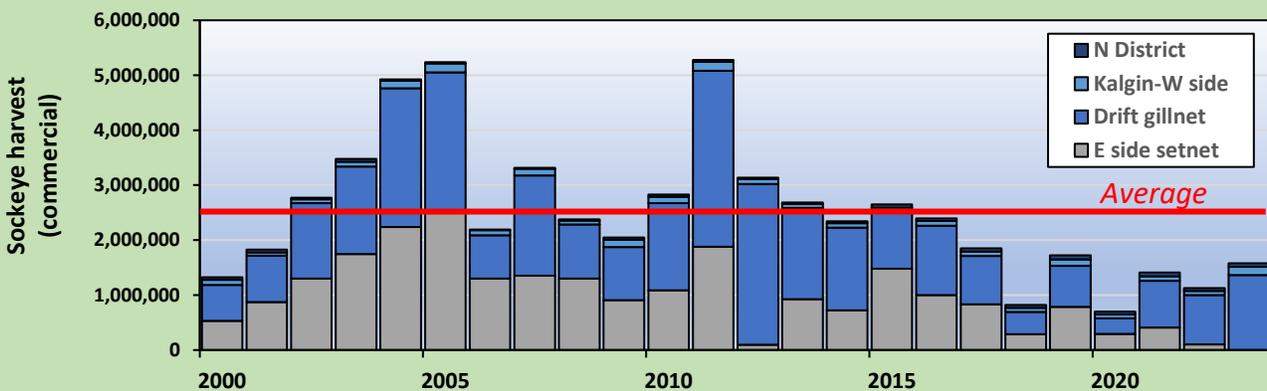


Figure 6. Upper Cook Inlet commercial fishery sockeye harvest by fishery, 2000-2023.

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.

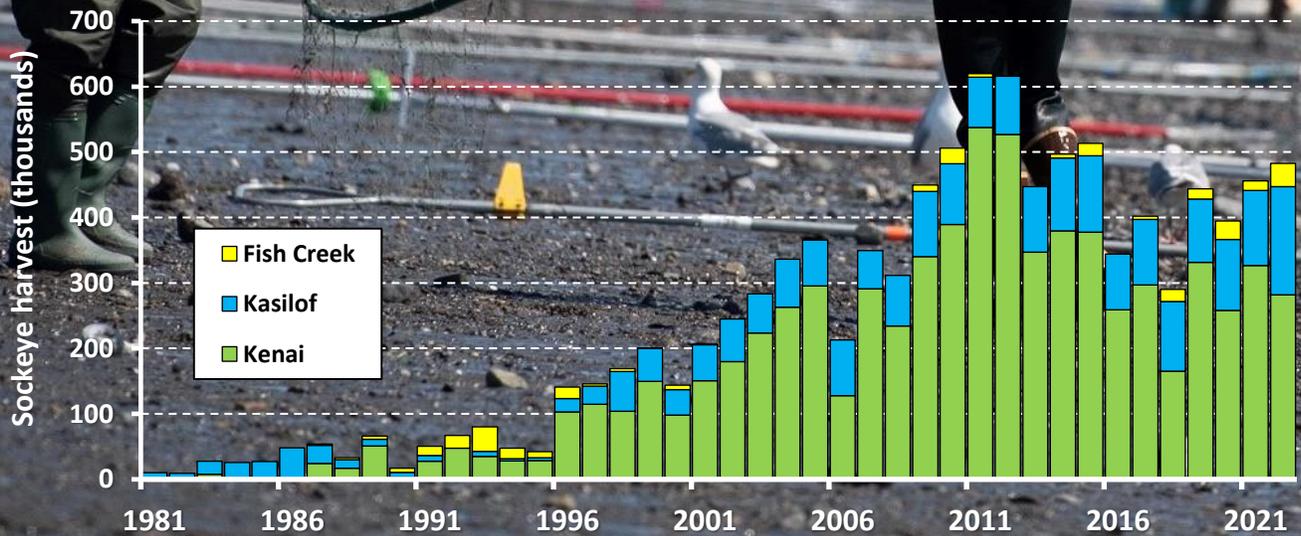


Figure 7. Personal use fishery harvest of sockeye in Upper Cook Inlet.

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.

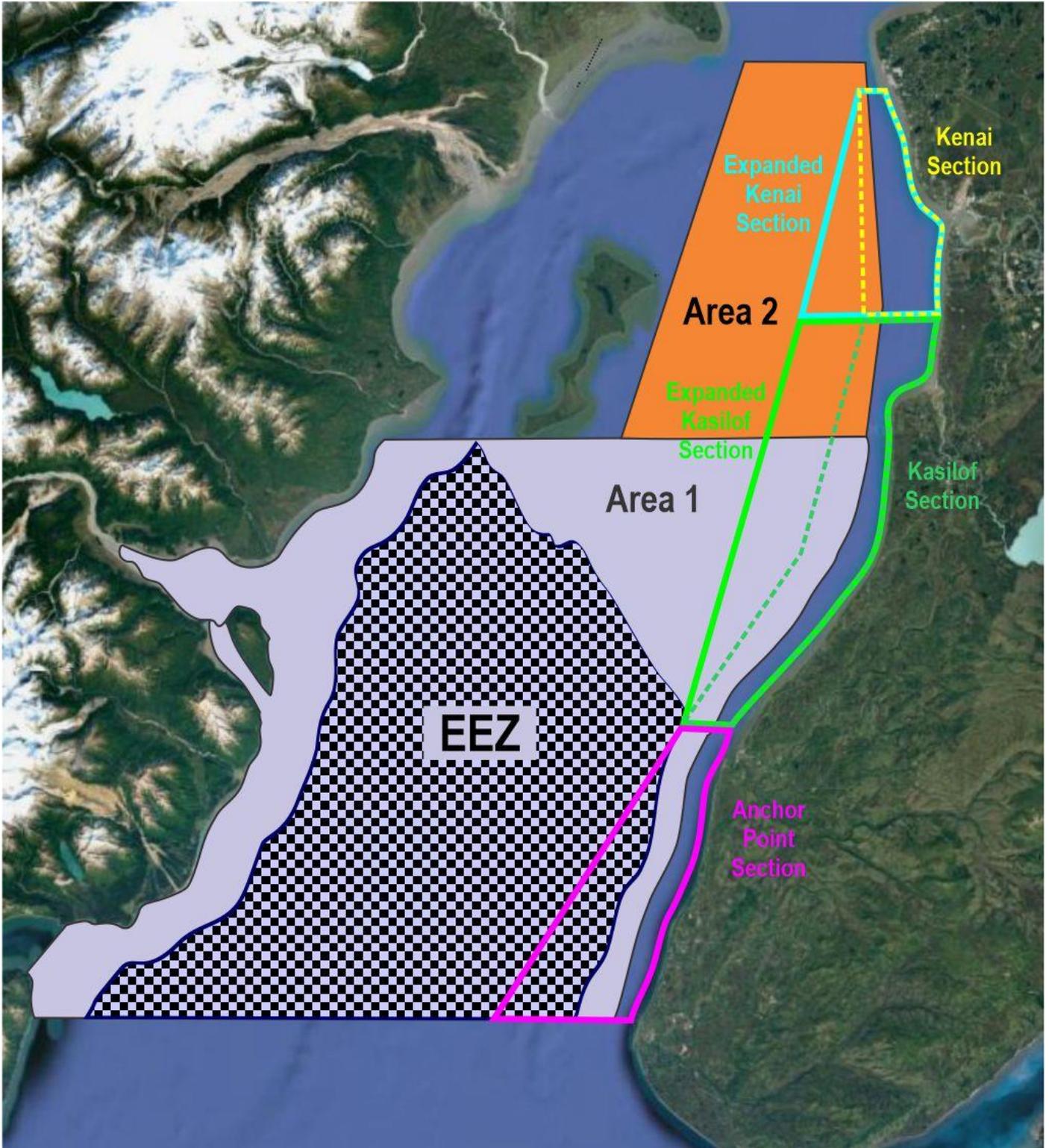


Figure 8. Commercial drift gillnet fishery areas of Upper Cook Inlet in relation to federal waters (approximate locations).

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.

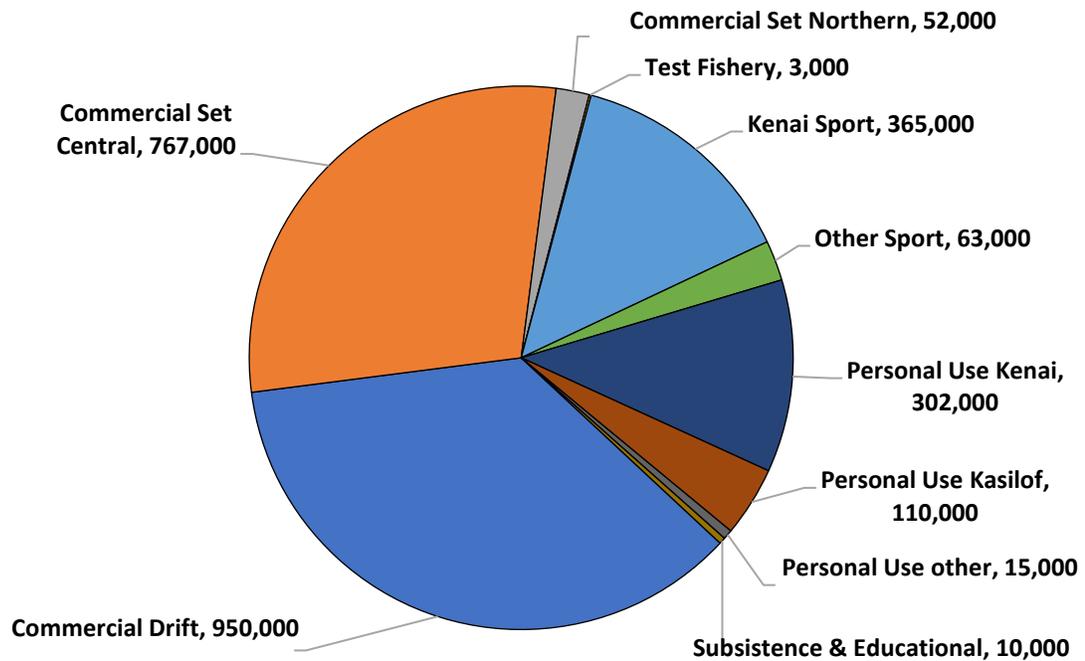


Figure 9. Recent average harvest of sockeye in Upper Cook Inlet salmon fisheries, 2012-2021.

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.

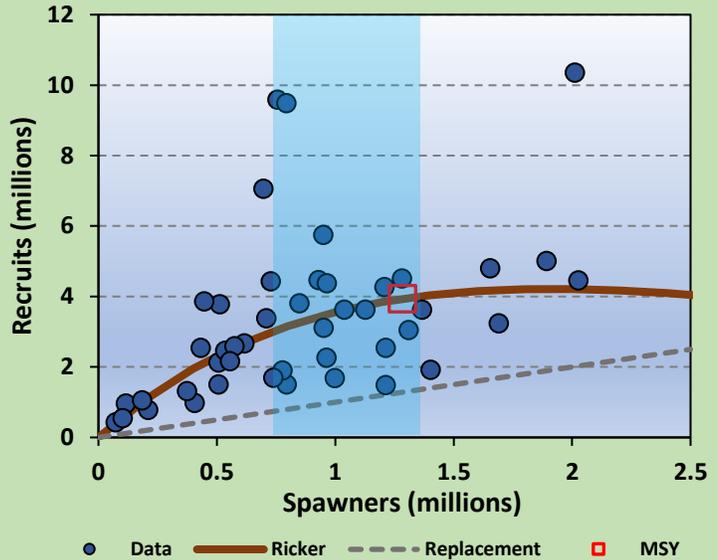


Figure 10. Stock-recruitment data for Kenai late-run sockeye in relation to SEG (Hasbrouck et al. (2022)).

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.

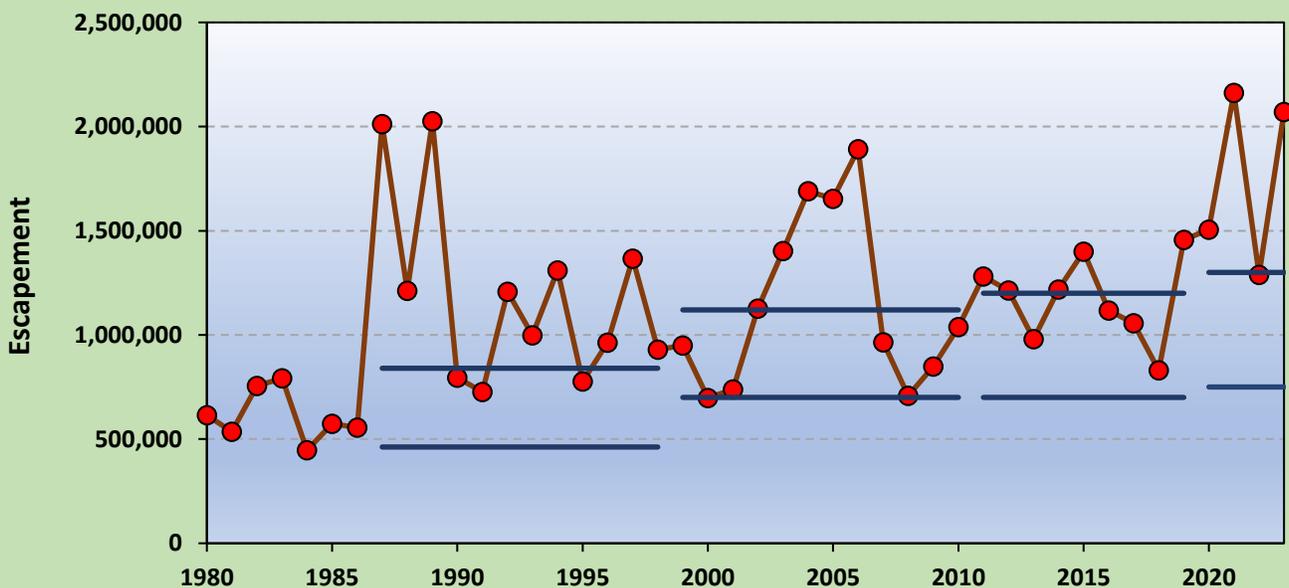


Figure 11. Historical escapement of Kenai late-run sockeye relative to goal ranges which have increased over time. (All numbers are in Didson sonar equivalents.)

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.

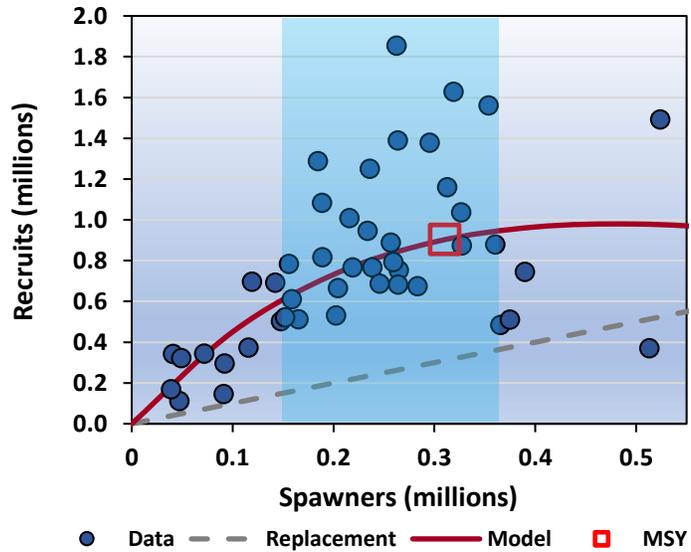


Figure 12. Stock-recruitment data for Kasilof sockeye in relation to OEG (McKinley et al. 2020).

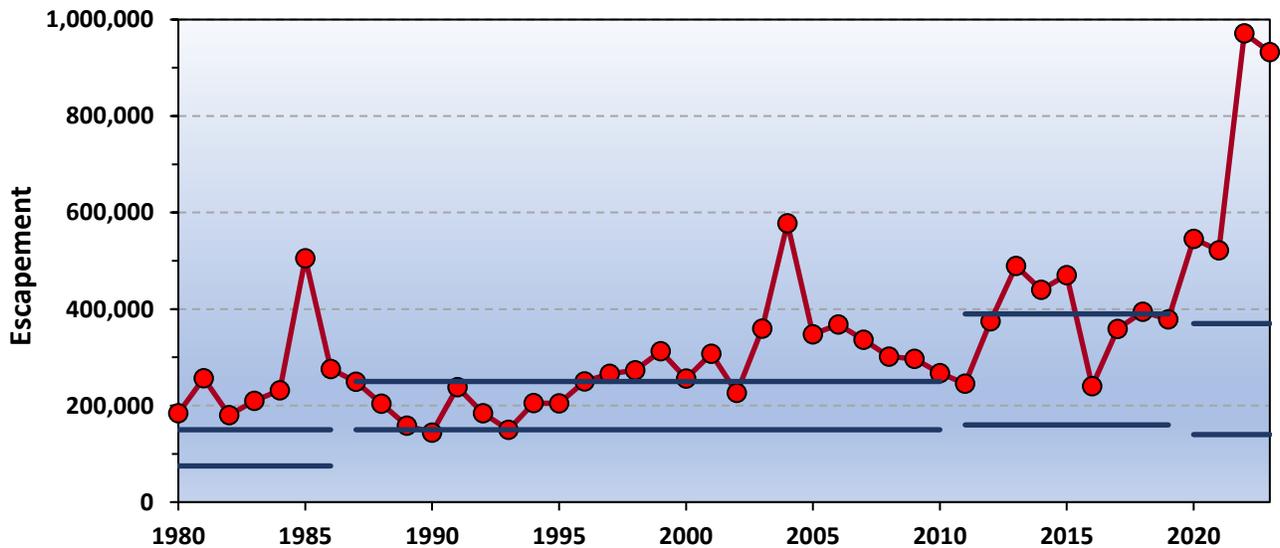


Figure 13. Historical escapement of Kasilof sockeye relative to goal ranges which have increased over time. (All numbers are in Didson sonar equivalents.)

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.

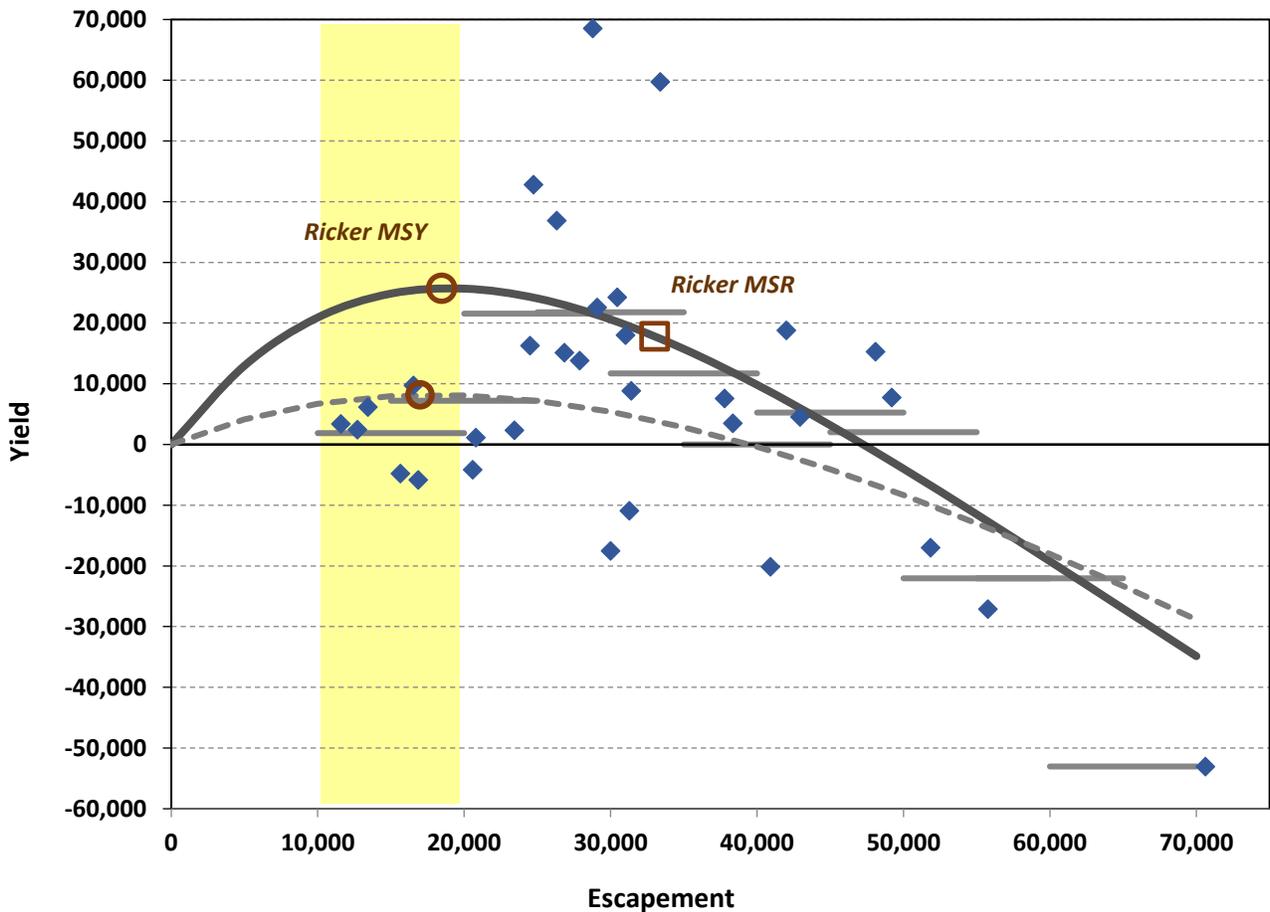


Figure 14. Yield analysis from stock recruitment data for Kenai Late-Run kings based on Ricker model and Markov table analyses. Zone of critical low escapements is highlighted.

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

When you are in a
hole, stop digging

The deeper the hole,
the steeper the climb

A lot of fish is good,
more fish is better

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.

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.

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.

4. ***The OEG produces greater sustained recruitment which delivers the greatest catch and value for the sport fishery for which kings are the priority.***

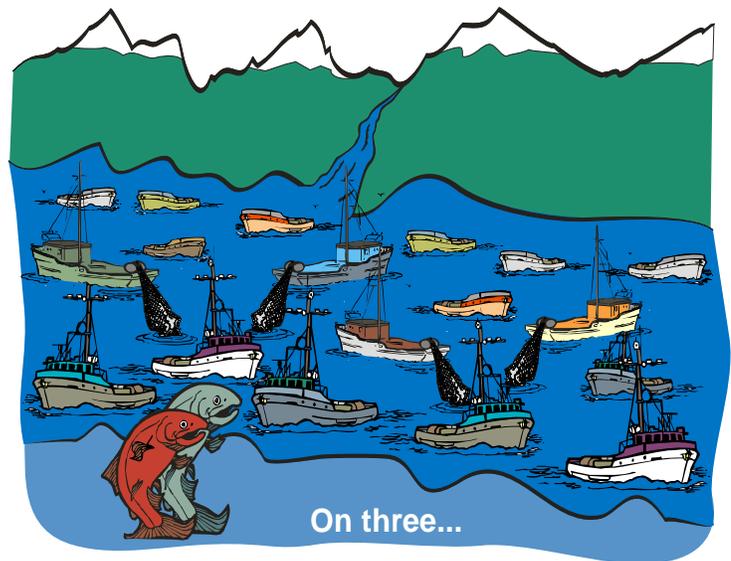
Escapement goals based on MSY are appropriate for a commercial fishery because fishing power is high and the fishery can catch a high proportion of the run even at low run sizes. Goals based on Maximum Sustained Recruitment (MSR) are appropriate for a sport or personal use fisheries where the greatest 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.

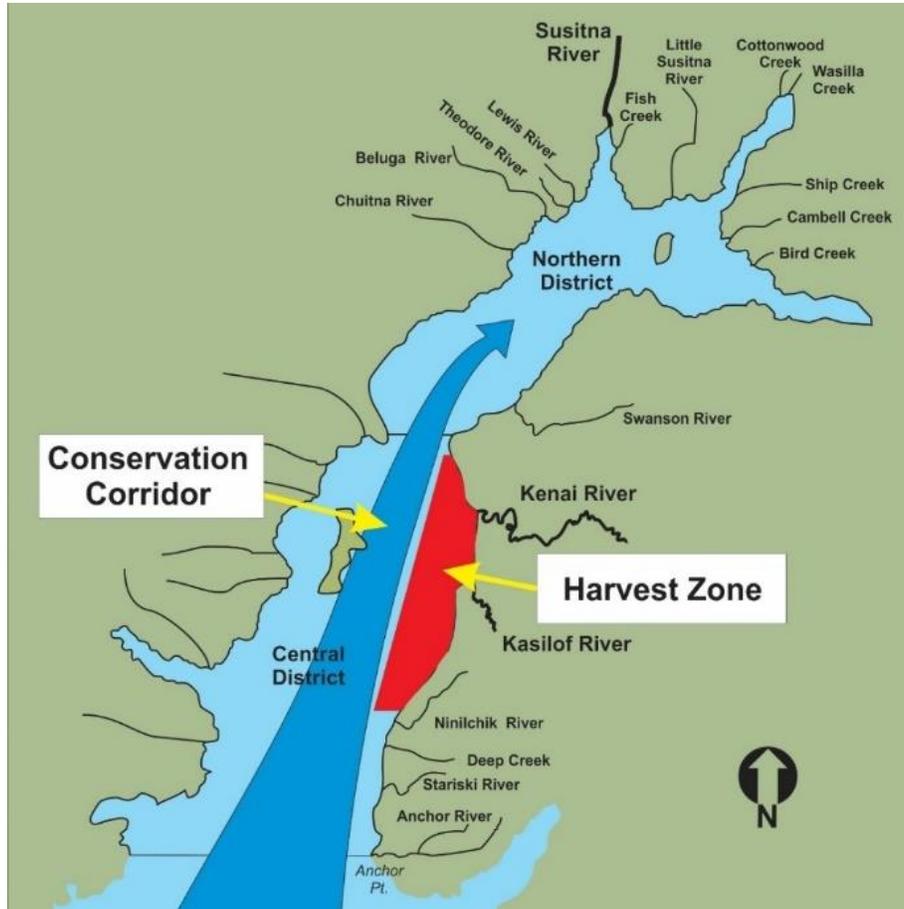
Prior to paired restrictions, the set gillnet fishery operated independent of the sport fishery based primarily on sockeye abundance. Management to avoid exceeding the upper end of sockeye escapement goals had the potential of trumping the need for restrictions to meet the lower end of the king escapement 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	<u>Use of bait prohibited</u> (expected 50% reduction in potential harvest)	<u>Up to 48 hr/wk</u> <u>Incentives for shallow (29 mesh) nets</u> <u>Reduced gear per permit</u> <u>Up to 36 hr/wk in August</u> Weekend no-fishing window (36 hours)
B	Use of bait prohibited <u>No retention of kings >34 inches</u>	<u>Up to 36 hr/wk</u> 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 <u>No retention of kings (catch & release only)</u>	<u>Up to 24 hr/wk</u> Incentives for shallow (29 mesh) nets Reduced gear per permit Up to 36 hr/wk in August Weekend no-fishing window (36 hours)
D	<u>No fishing for kings</u>	<u>Closed</u>

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.

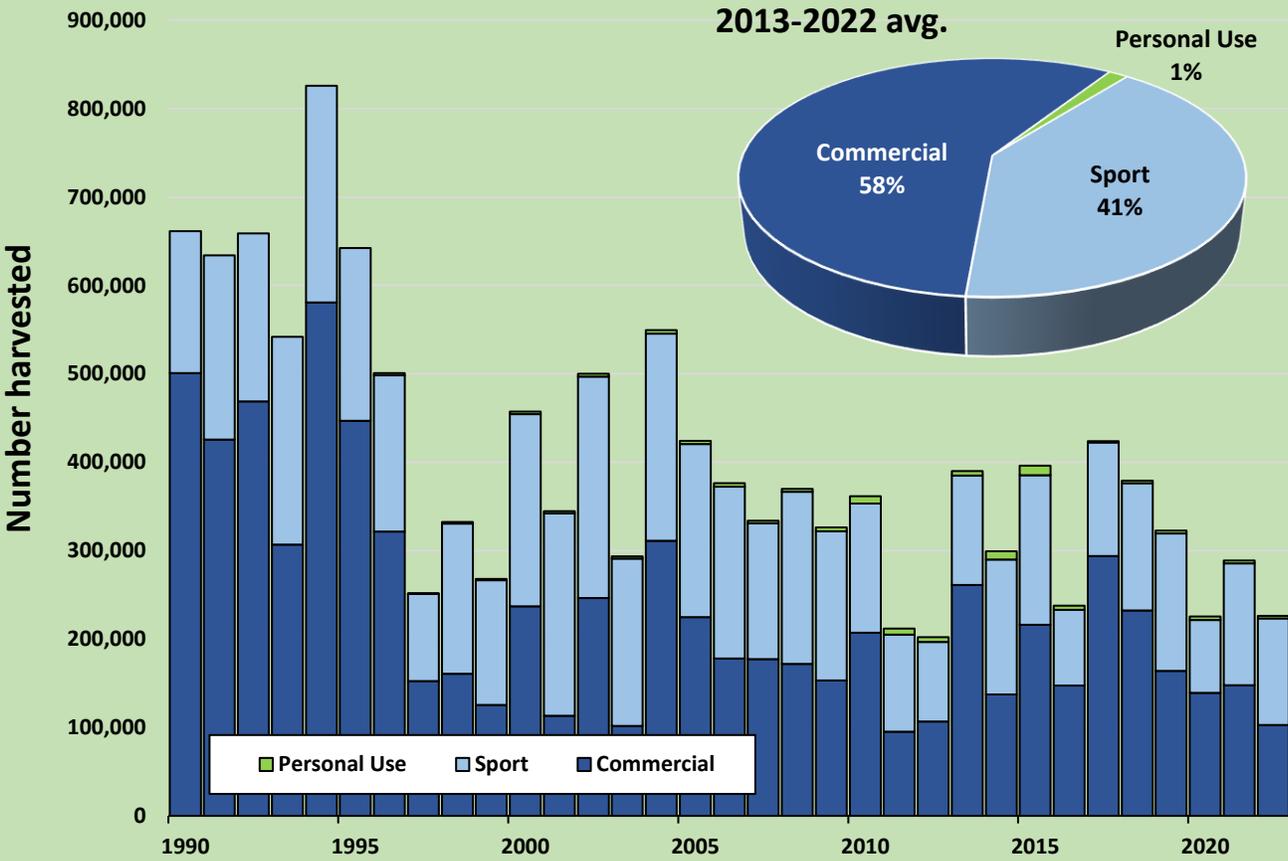
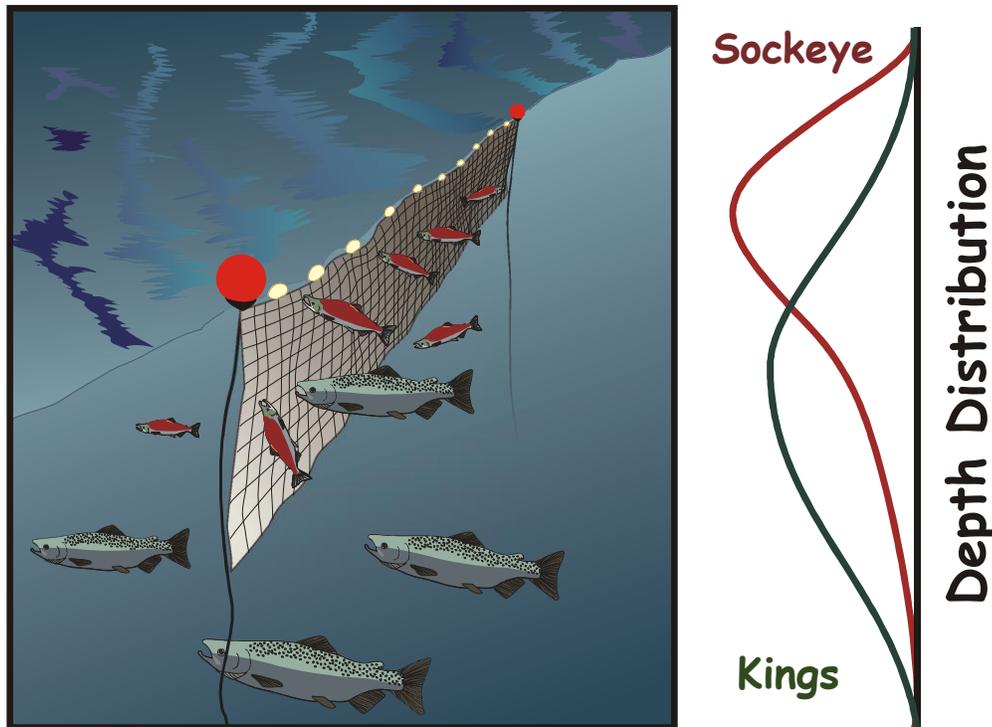


Figure 15. Annual harvests and recent harvest shares of Upper Cook Inlet coho salmon.

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 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.

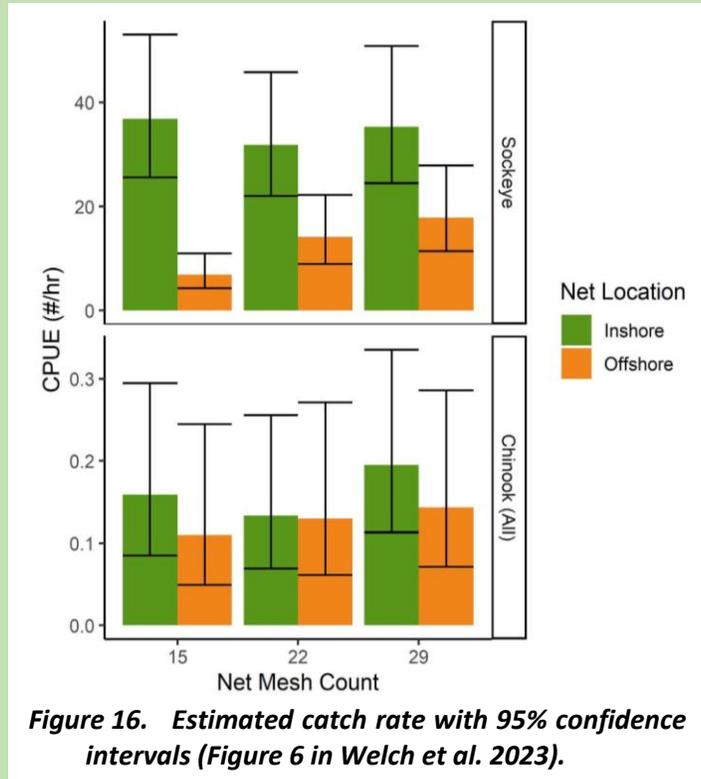


Figure 16. Estimated catch rate with 95% confidence intervals (Figure 6 in Welch et al. 2023).

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 – <u>1.6 million</u>
2.3 – 4.6 million	1.1 – 1.4 million	1.1 – <u>1.6 million</u>
>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 to 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

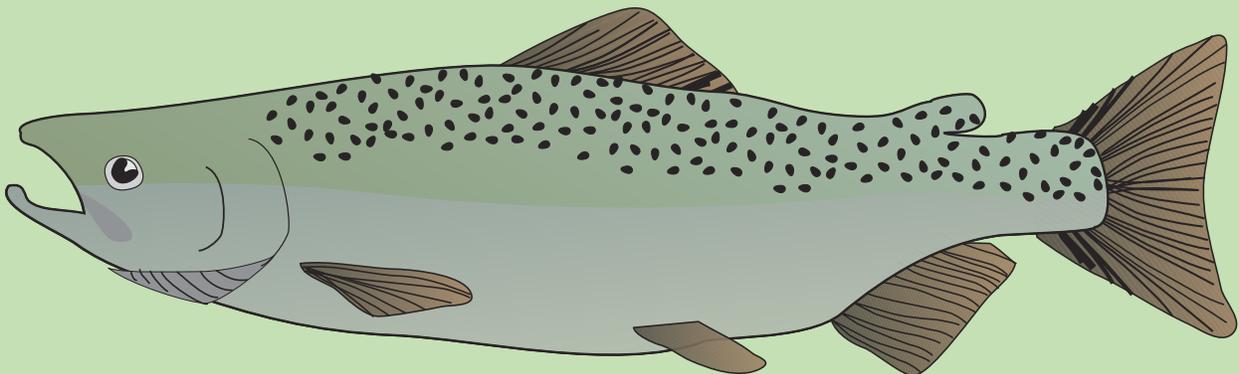
Establish a dedicated management plan for Kasilof late-run kings

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
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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	<p>1A. Status quo: Paired restriction step downs, OEG of 15,000 – 30,000</p> <p>1B. Restrict fishing for king salmon to nonretention</p> <p>1C. Reduce the king salmon sport fishing season</p> <p>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 (<i>no retention, no bait, reduced days, resident harvest, no liberalizations</i>)</p> <p>1E. Close king salmon sport fishery</p> <p>1F. Remove bait during the August inriver sport fishery (coho timeframe)</p> <p>1X. Increase sockeye salmon bag limit to 6/day, 12/possession (<i>to limit sockeye escapement</i>)</p>
Marine Sport	<p>2A. Status quo: closure as per paired restriction when below OEGs of 15,000 – 30,000</p> <p>2B. Modify provisions of the Upper Cook Inlet Summer Salt Water King Salmon Plan (combination)</p> <p>2C. Restrict to nonretention</p> <p>2D. Reduce the king salmon sport fishing season</p> <p>2E. Reduce the king salmon sport fishing area</p> <p>2F. Close Cook Inlet marine king salmon sport fishery</p>
Drift Gillnet	<p>3A. Status quo: EO nearshore restriction when setnets are closed (<i>1-1.5 miles N/S of Kenai</i>)</p> <p>3B. Prohibit CDDGN fishery within 2 miles of shore</p> <p>3C. Close CDDGN fishery in state waters</p>
Set Gillnet	<p>4A. Status quo Paired restriction step downs, OEG of 15,000- 30,000</p> <p>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 (<i>unspecified time, area & gear limits, require retention</i>)</p> <p>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 (<i>2x12 hr/ wk, max 4 periods, require retention & observers, commissioner authority for net depth, #, nearshore</i>)</p> <p>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 (<i>current area, KSHA, PU areas including potentially exclusive times</i>)</p> <p>4E. Close ESSN fishery</p> <p>4X. Allow opening of Kasilof River Special Harvest Area (KRSHA) when ESSN is closed for king salmon conservation to target Kasilof River sockeye salmon (<i>to limit sockeye escapement</i>)</p>
Kenai PU	<p>5A. Status quo EO to prohibit retention</p> <p>5B. Allow retention of king salmon less than 20 inches in the personal use fishery</p> <p>5C. No retention of king salmon in the personal use fishery</p> <p>5D. Restrict time or close Personal Use Fishery</p> <p>5X. Increase area of Kenai and Kasilof Rivers personal use dipnet fishery (<i>to increase sockeye harvest</i>)</p> <p>5Y. Increase time of Kenai and Kasilof Rivers personal use dipnet fishery (<i>to limit sockeye escapement</i>)</p>
Kasilof PU	<p>6A. Status quo EO to reduce setnet hours</p> <p>6B. Restrict time or close personal use fishery</p> <p>6X. Reduce legal mesh size of Kasilof River personal use gillnets (<i>6 to 4.75" to increase sockeye harvest efficiency</i>)</p>

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
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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
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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

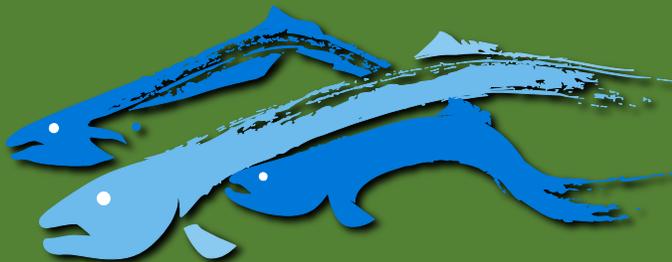
Personal Use

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
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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



Anchorage, Alaska



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 Alaska 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

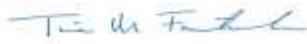
includes science, analysis, and assessment from ADF&G and the hope they will provide information in an unbiased manner. In order to provide sufficient oversight and regulation of the permitting and compliance of the programs there is a section at ADF&G charged with those functions. It is their job to 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.

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?

Robert T. Lackey

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Citation: Lackey, Robert T. 2009. Is science biased toward natural? *Northwest Science*. 83(3): 291-293.

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Robert T. Lackey¹, Department of Fisheries and Wildlife, Oregon State University, Corvallis, Oregon 97331

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.

¹Author to whom correspondence should be addressed. E-mail: Robert.Lackey@oregonstate.edu. The views and comments presented are those of the author and do not necessarily represent those of any organization.

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.



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,

A handwritten signature in black ink that reads "Shauna Hegna".

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 leisurely and enjoyable pace.

Proposal 161 SUPPORT. 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 angler 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 too 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 too long the department has been 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 liberalizes 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 period 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, precautionary 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 strategy 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 strategy 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 strategy 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 strategy 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 strategy 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 strategy 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, especially 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 punitive and probably not helpful to Chinook recovery.

Prop 89. Opposed. Resentfully punitive 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 Management 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. Opposed. 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 and 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 anglers 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 these 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
Proposal 83: 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

Submitted by: Dane Markham
Community of Residence: Soldotna, AK

I strongly favor the elimination of the OEG.

Proposal 90: Oppose Proposal 106: Oppose

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

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

Planning and Land Use Department

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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.

Providing Outstanding Borough Services to the Matanuska-Susitna Community.

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 Northern 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 Northern 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 difficulty, 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 Northern 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 Northern 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 statute 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 Northern 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 Northern 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 Northern 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 Northern 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 Northern 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 quickly 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 quickly 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.

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 Northern 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 quickly 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 Northern-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 quickly 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.

Hatchery Production

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.



MSB Fish & Wildlife Commission Chair, Andy Couch

It Takes Fish To Make Fish

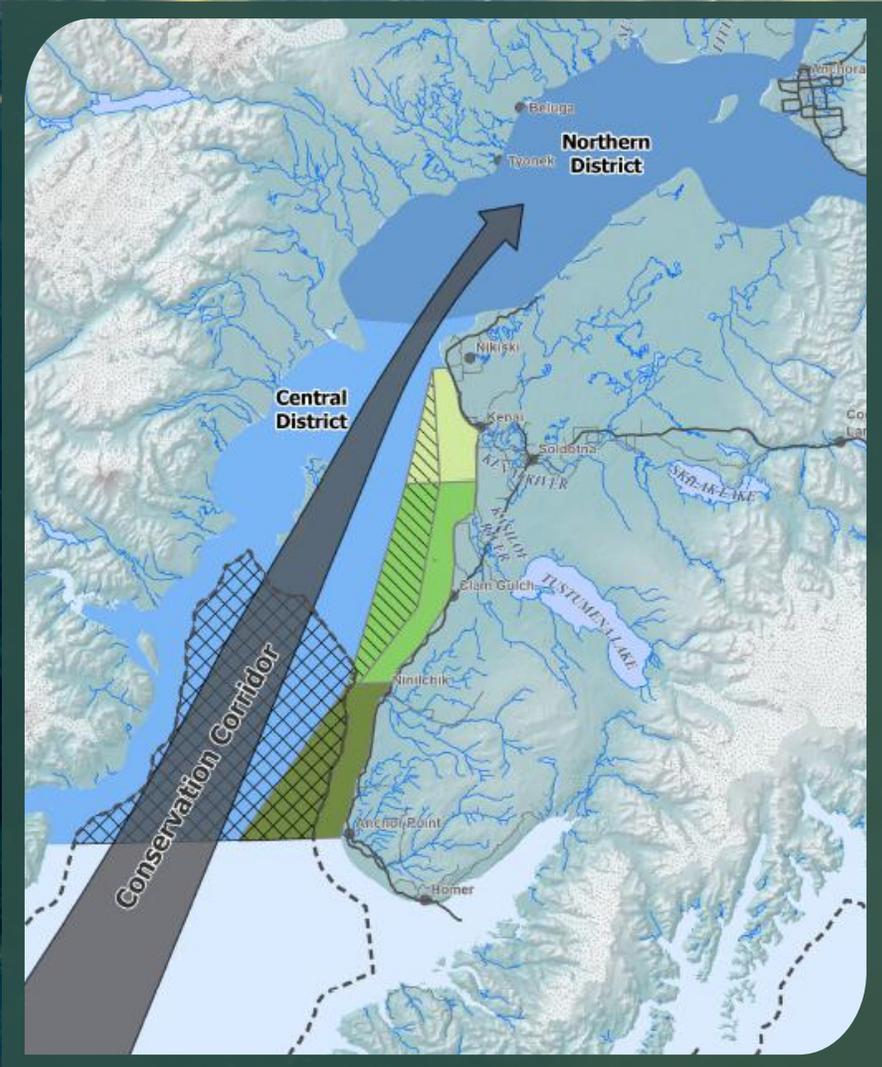
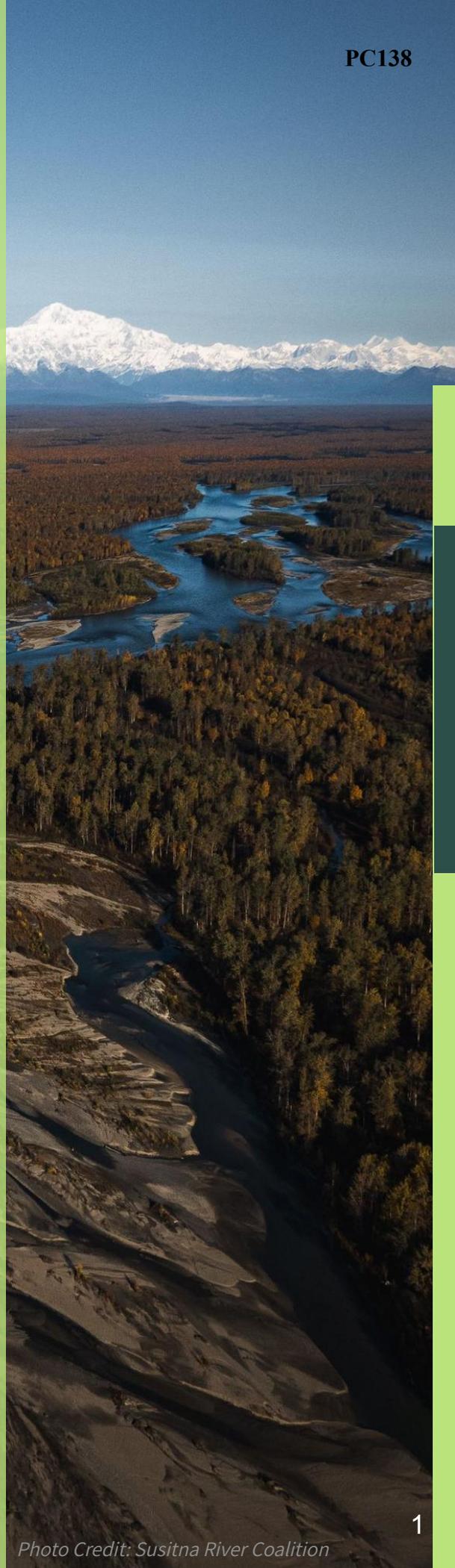


Photo Credit: Fernando Lessa



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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.



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.

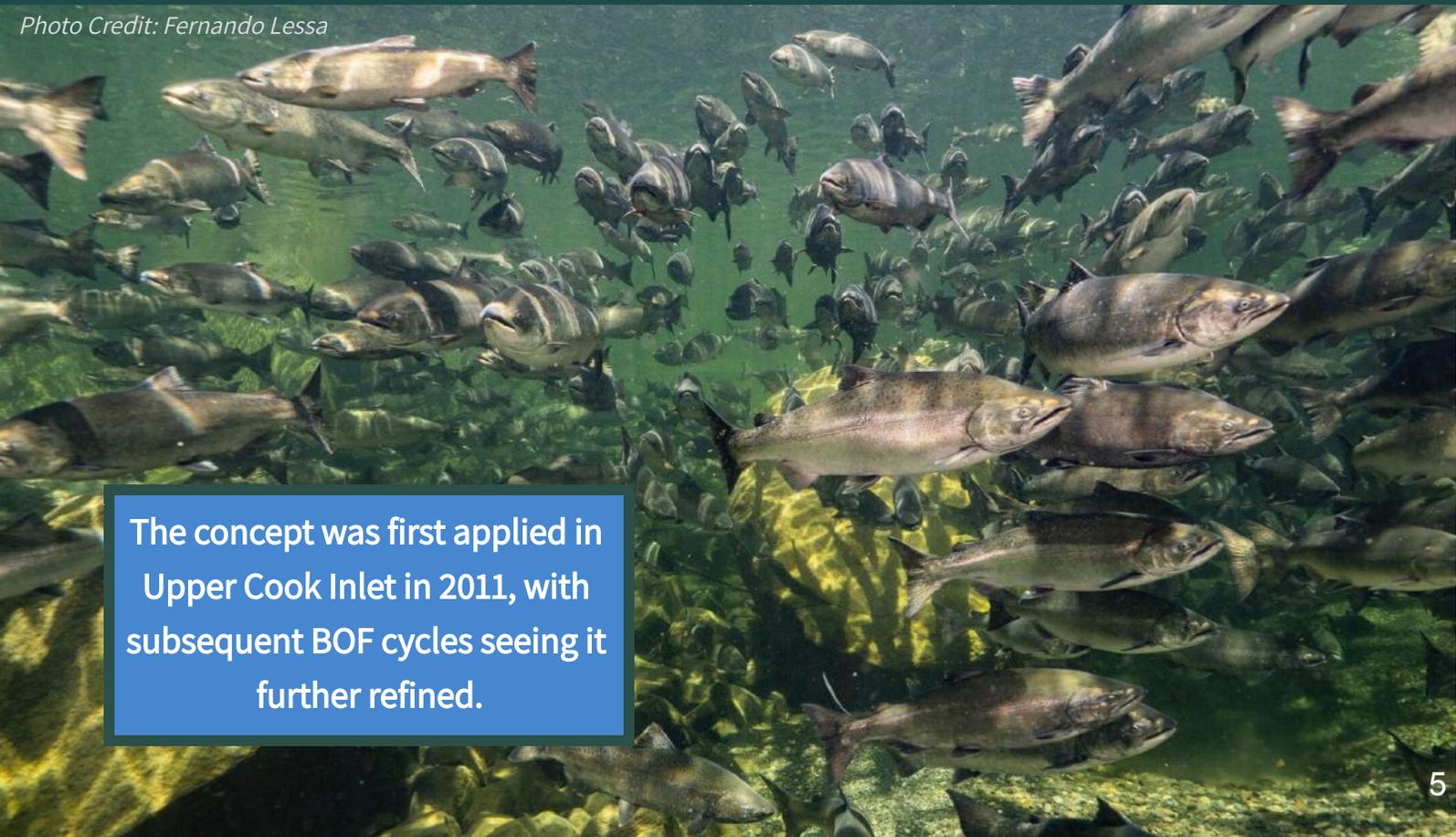
Photo Credit: Jonny Armstrong

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

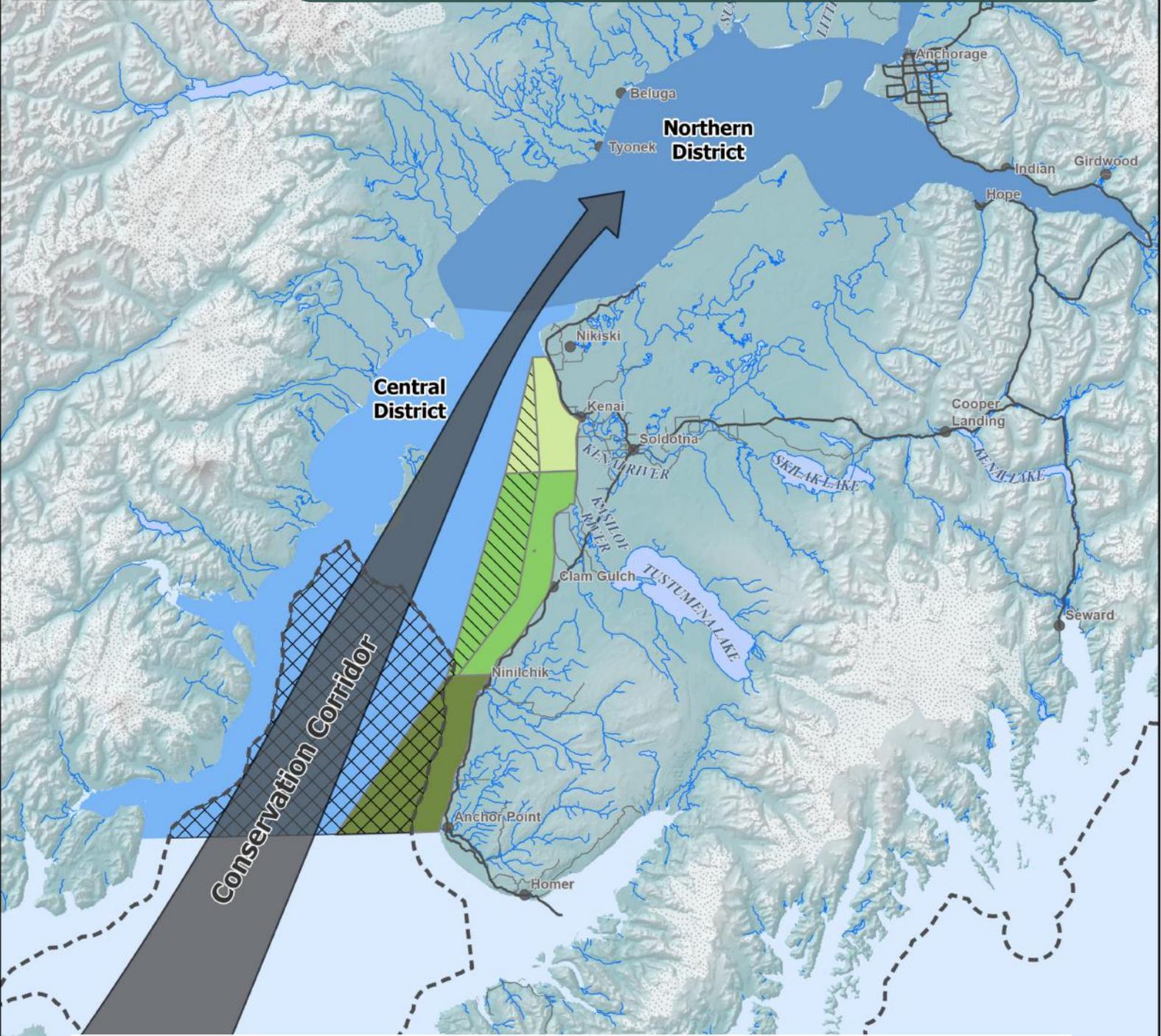


The concept was first applied in Upper Cook Inlet in 2011, with subsequent BOF cycles seeing it further refined.

It is impossible to harvest one stock at a time in a mixed-stock fishery like this one. However, "fishing for Kenai sockeye in the terminal harvest zones, closer to shore, will result in lower harvest numbers of Susitna sockeye and coho because these northern-bound salmon are primarily running up the middle of the Central District."* The Expanded Kenai, Expanded Kasilof and Anchor Point Harvest Zones are frequently employed to ensure stock specific harvests of Kenai Peninsula sockeye salmon.

Legend

- Conservation Corridor
- Harvest Zones**
 - Kenai Section
 - Expanded Kenai Section
 - Kasilof Section
 - Expanded Kasilof Section
 - Anchor Point Section
- Cook Inlet EEZ Area
- NOAA 3 mile buffer
- AWC Streams
- AWC Lakes



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.



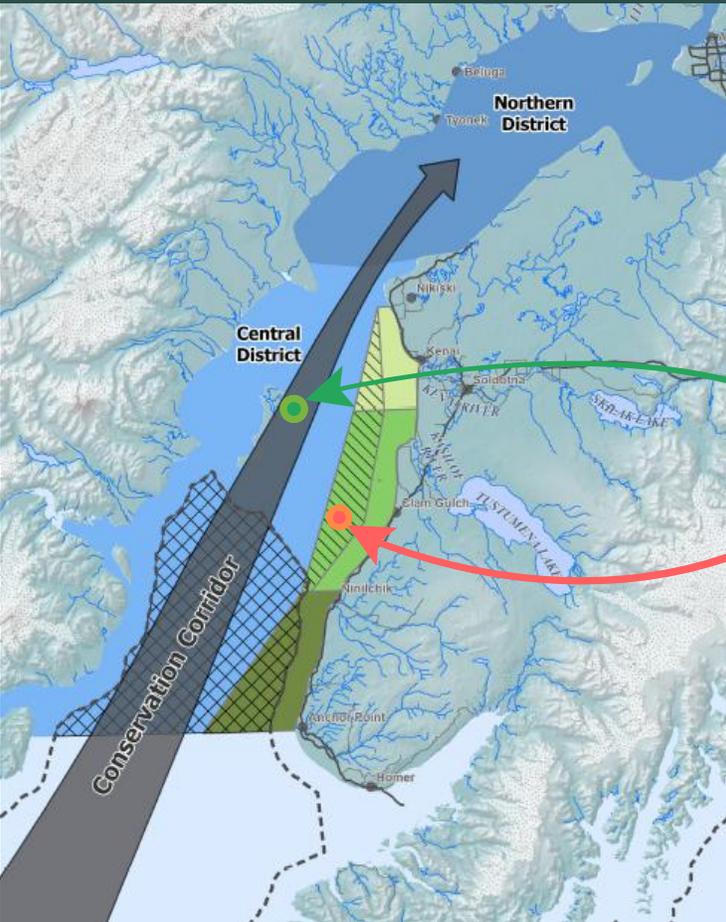
Coho Returns

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

WITH THE CORRIDOR



Photo Credit: Redoubt Reporter

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.

Fish Creek Sockeye Abundance Estimates



*Source: ADF&G

MIXED STOCK FISHERY COMPLEXITY

UCI RUN TIMING	May	June	July	Aug	Sep
Early Sockeye	[Red bar]				
Early King	[Blue bar]				
Late Sockeye		[Red bar]			
Late King		[Blue bar]			
Early Coho			[Purple bar]		
Late Coho				[Purple bar]	
Chum			[Orange bar]		
Pink			[Dark Blue bar]		

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.**

When ADF&G Forecasts a Large Sockeye Run, ^{PC138} Fewer Salmon Return North to Spawn.

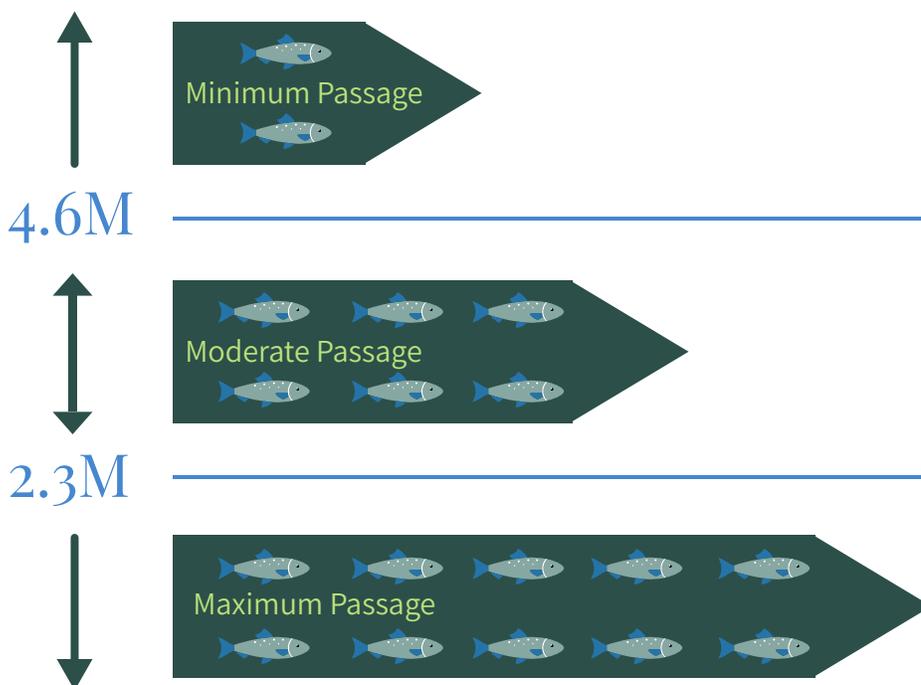
Historically, the larger the pre-season projections of Kenai sockeye by ADF&G, the fewer Susitna coho and sockeye successfully made it north to their natal streams to spawn. Large runs tend to trigger more liberal commercial fishing in the mixed-stock fishery of the Conservation Corridor. Fishing the 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.

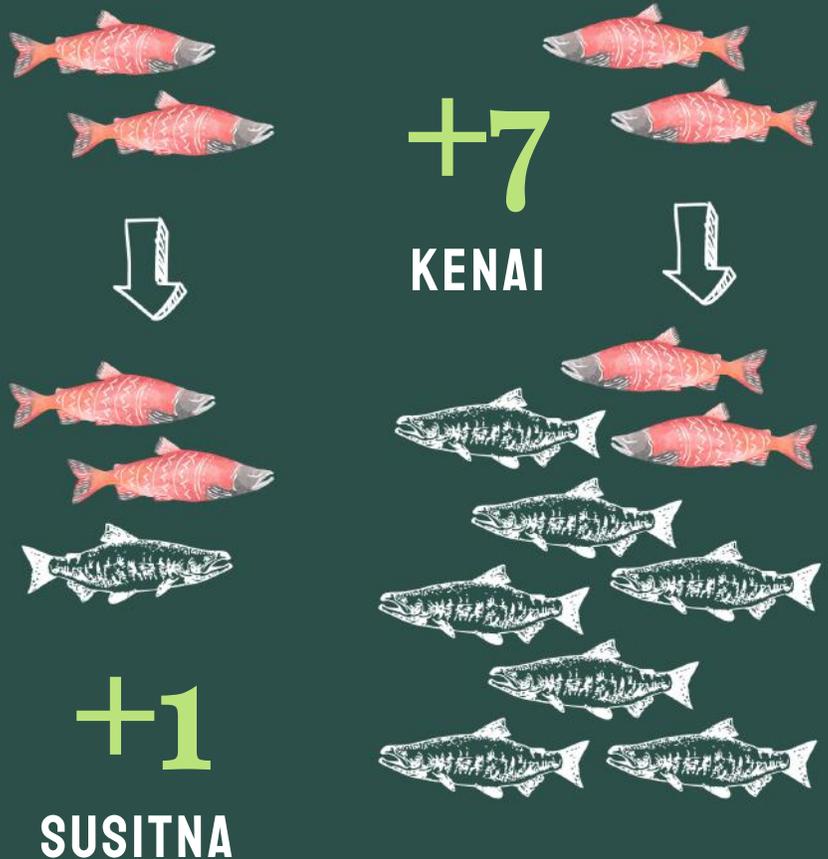
KENAI PROJECTIONS VS NORTHERN-BOUND SALMON PASSAGE



A Strong Conservation Corridor Protects ^{PC138} 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



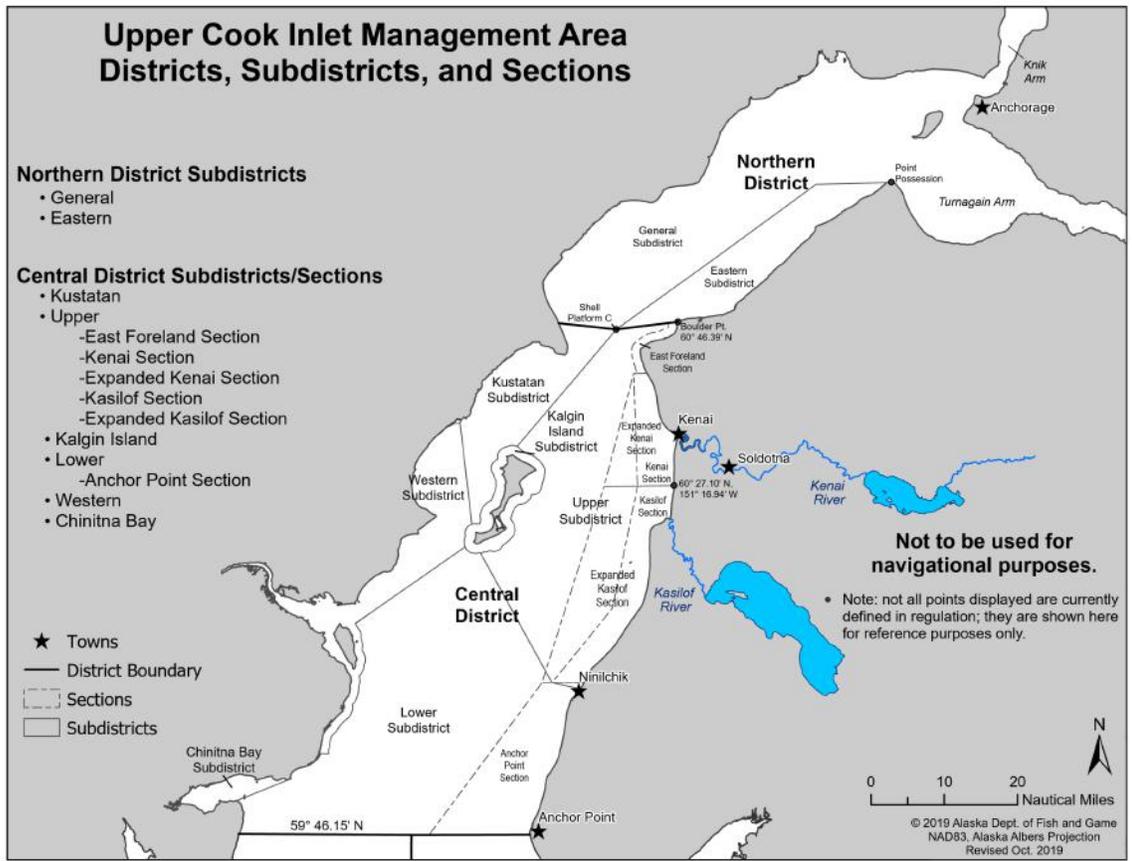
**ADF&G Sockeye Salmon productivity*

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 UNKNOWNNS 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.

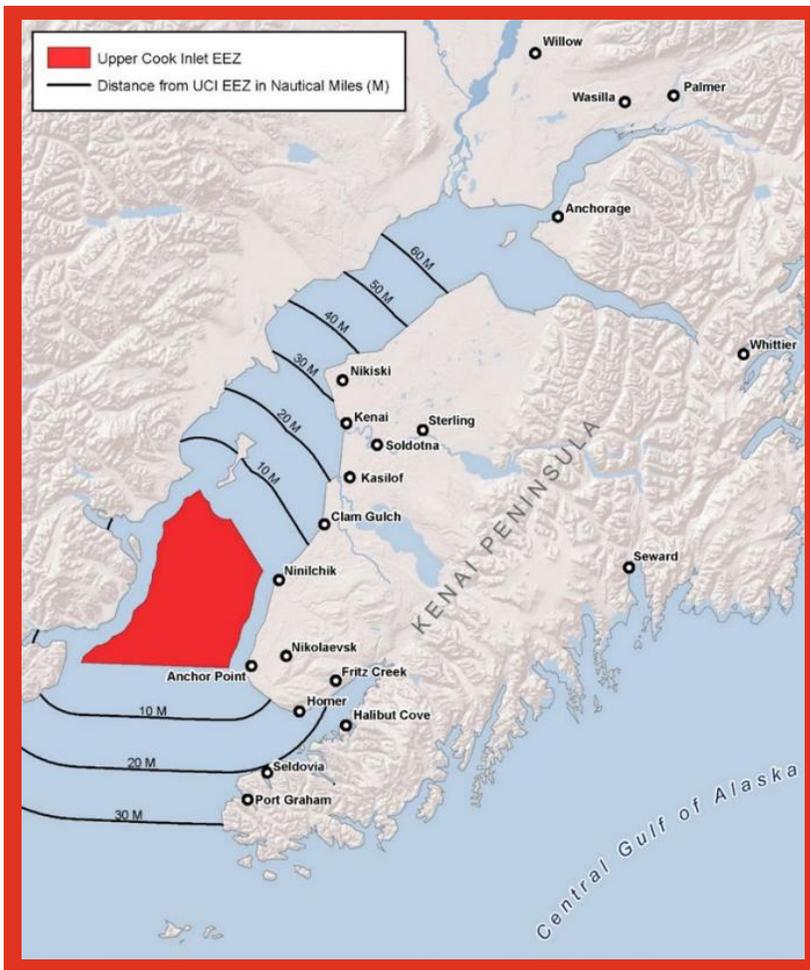
Set (fixed) gillnets are the only permitted gear in the Northern District, whereas both set gillnets and drift (mobile) gillnets are allowed in the Central District. Seine gear is restricted too, but seldom used, in the Chinitna Bay subdistrict. The Commercial Fishing Entry Commission reported that 567 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

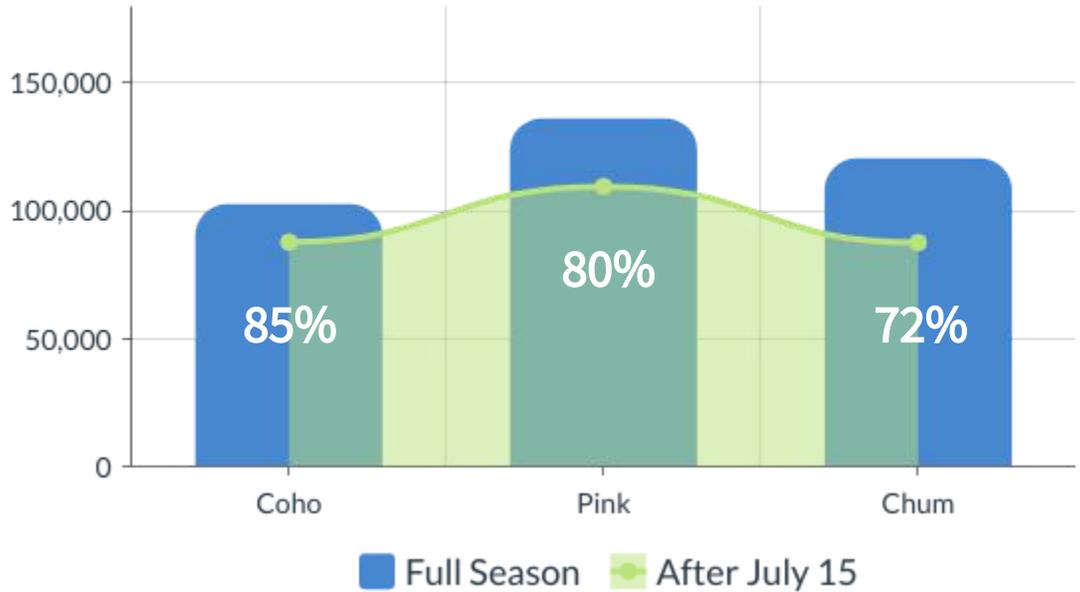
MANAGEMENT OF THE UCI COMMERCIAL FISHERY IS FACING MAJOR CHANGES.

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

ANNUAL CENTRAL DRIFT GILLNET HARVEST



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.





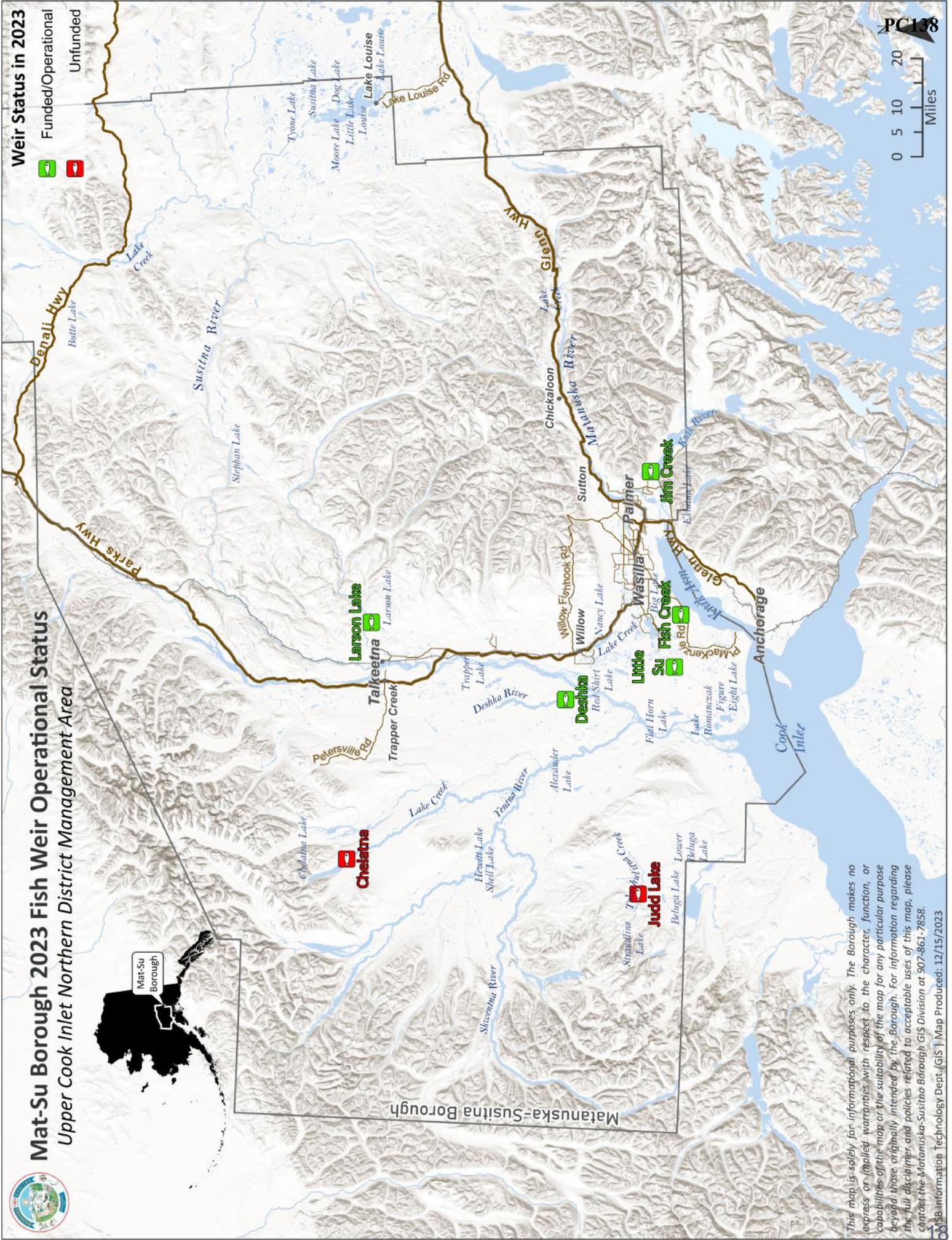
Mat-Su Borough 2023 Fish Weir Operational Status

Upper Cook Inlet Northern District Management Area



Weir Status in 2023

- Funded/Operational
- Unfunded



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MSB Information Technology Dept./GIS | Map Produced: 12/15/2023

STOCKS OF CONCERN

Photo Credit: Jonny Armstrong



CURRENT Stocks of Management Concern

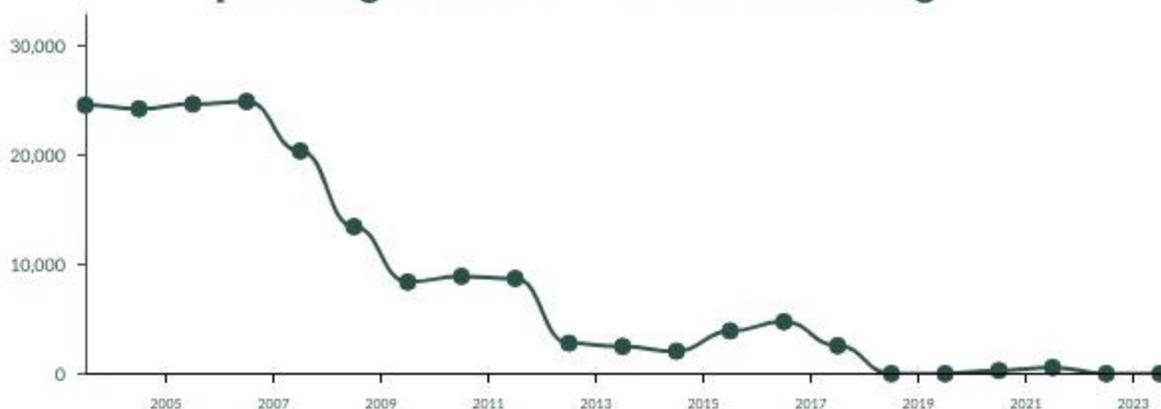
- King in Alexander Creek (2010)
- King in Chuitna River (2010)
- King in Theodore River (2010)
- King in East Susitna (2019)

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?

Sport King Harvest within Susitna Drainage



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

BC 138
"A **stock of conservation concern** is defined in 5 AAC 39.222(I)(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(I)(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(I)(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



DID YOU KNOW?

BABY SALMON LIVE HERE

This is Important Salmon Habitat Please Help Protect Their Home

For more information, go to: **WWW.BABYSALMON.ORG**

This message brought to you by the **Great Land Trust**, in partnership with the **Mat-Su Salmon Habitat Partnership**.

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GREAT LAND TRUST

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.



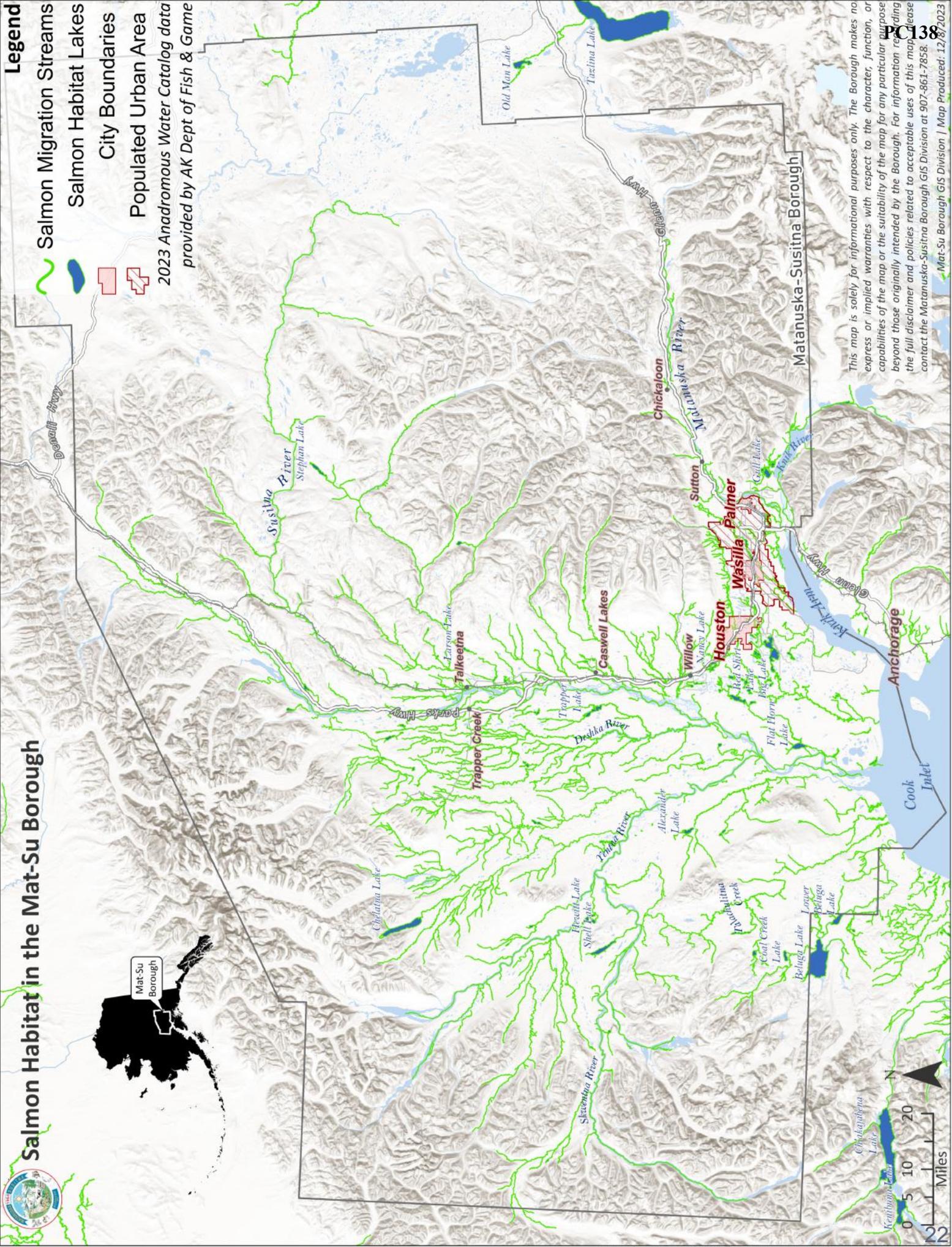
There are more than 4,000 miles of documented salmon habitat in the Susitna Basin alone. These streams produce the salmon that are critical for the long-term stability of salmon populations in Cook Inlet. Through conservative management, maintaining and enhancing the Conservation Corridor increases the likelihood that an adequate number of fish return to continue sustainable populations.



Salmon Habitat in the Mat-Su Borough



- Legend**
- Salmon Migration Streams
 - Salmon Habitat Lakes
 - City Boundaries
 - Populated Urban Area
- 2023 Anadromous Water Catalog data provided by AK Dept of Fish & Game



This map is solely for informational purposes only. The Borough makes no express or implied warranties with respect to the character, function, or capabilities of the map or the suitability of the map for any particular purpose beyond those originally intended by the Borough. For information regarding the full disclaimer and policies related to acceptable uses of this map, please contact the Matanuska-Susitna Borough GIS Division at 907-861-7858.

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

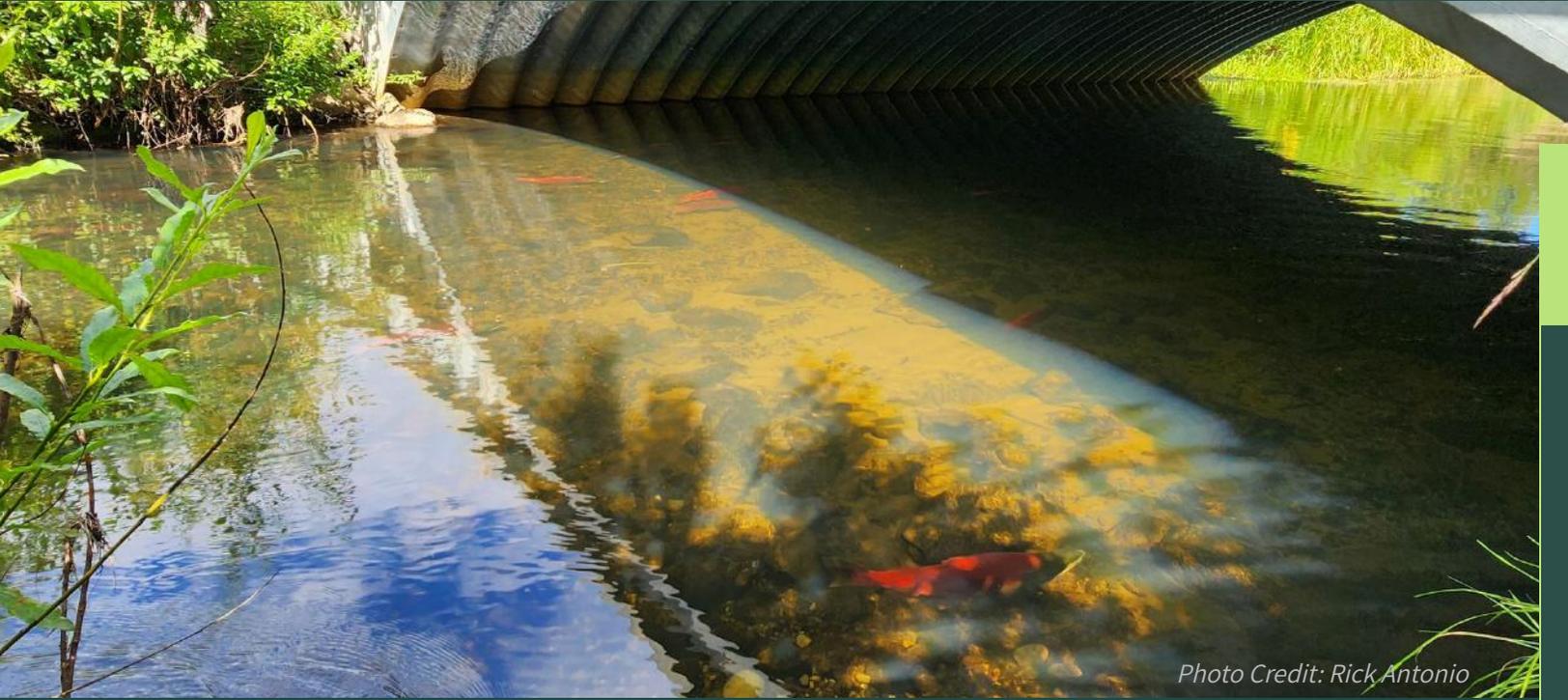


Photo Credit: Rick Antonio

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

A REASONABLE OPPORTUNITY

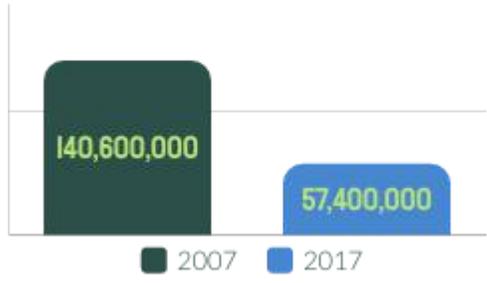


A mission of the MSB Fish & Wildlife Commission is to work towards adopting management plans conservative enough to reach midpoint escapement goals for Northern Cook Inlet sockeye, coho and king salmon, providing more realistic and reasonable shared harvest opportunities throughout the season, for all users.

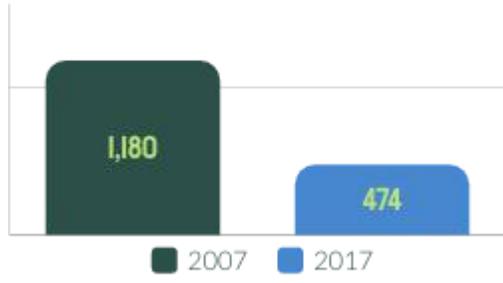


2007 AND 2017 STUDIES SHOW DECLINE IN MAT-SU BOROUGH SPORT FISHING

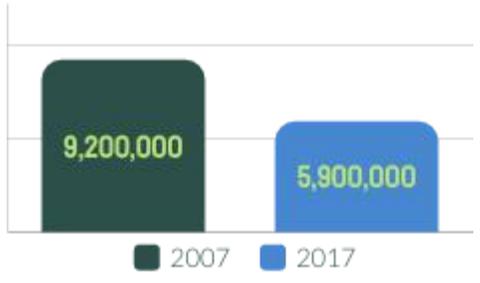
Direct Spending



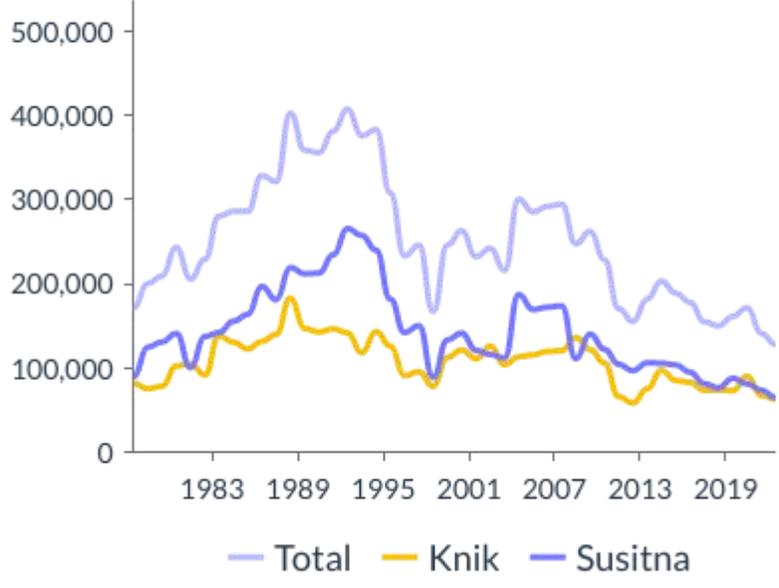
Employment



Tax Revenues



Mat-Su Borough Angler Days



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.

*Source: ADF&G

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.



All issues show the ^{PC138} 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



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

Matanuska-Susitna Basin Salmon Habitat Partnership
Thriving fish, healthy habitats, & vital communities in the Mat-Su Basin

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

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.

A handwritten signature in black ink, appearing to read "John McCombs", with a long horizontal flourish extending to the right.

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 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

Submitted by: Daniel Meyer
Community of Residence: Kenai Alaska

I support proposal 83

Proposal83: Support

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.

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 but 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]

Submitted by: Jesper Moldaschl
Community of Residence: Hadsten, Denmark

Please don't consider lowering the current OEG on late run kings.

Proposal83: Support

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

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.

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
