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State of Alaska
 Department of Fish & Game
 Board Support Section
 Karl Johnstone, Chair
 P.O. Box 115526
 Juneau, AK 99811-5526

Kenai Peninsula Fishermen's Association (KPFA), offers the following comments on the Task Force meeting document: referenced as "Recommendations for Proposal 249":

- **By July 21**, projection date in regulation.

KPFA response: Fully supports the 21st; represents the mid-point in projection of the in-river run and regulation provisions are written from July 21- 31, and provides continuity in regulations. In addition "on or after July 21" can provide clarification in the direction to the department.

- **(1)** "Make the SEG an optimal escapement goal (OEG) of 13,000 – 30,000 to allow latitude for the department to assess uncertainties in run timing variability."

KPFA response: supports, and fully supports the intent language measure for flexibility on run timing variability. KPFA fully supports the Maximum Sustained Yield range of 13,000 – 28,000 produced by the Department. KPFA supports 12,000 – 28,000 range from the Department's Escapement, Sustained Yield, and Recruitment data in the transition to DIDSON-based goal range during the 2013 season.

- **(2)** "Management by Emergency Order (ESSN)."

KPFA Response: The intent of this language is for the Department to manage by adaptive management practices instead of being tied to two "window closures" per week in regulation on prescribed "days." Note: Prescriptive windows have caused the Kasilof River sockeye salmon BEG goal to be exceeded with a historical record entry and Kenai River sockeye passage rates of well over 250,000 per day which caused exceeding the established goal range and importantly the lost foregone surplus to escapement harvest opportunity even when escapement goals were met and projected to be met. Regular periods and hours per week are specified in the Sockeye Salmon

Management Plans. **KPFA supports in-season adaptive fishery management practices by the department throughout this state.**

Note: ADF&G Commercial Fisheries Division Annual Reports stated "more kings are harvested with windows." The 2008 Board Finding directs the Department to break windows when necessary under the commissioner's authority. Unfortunately, time to immediately issue emergency orders on short notice events when significant numbers of sockeye salmon are along the eastside beaches but requires the Area Manager to timely process the Emergency Order by spending several hours to be given the delegation to act. Windows create "a quasi-uncontrolled fishery" as the fishery resource is foregone by management. As one task force member put it "fish move and run according to their own schedule – they don't go by the weekly calendar date."

Note: the highest historical harvest rates (sockeye salmon ESSN) per day occur during the 15th of July through July 25th. 100,000 – 440,000 harvest record (2011).

- "If the Department projects that the OEG of 13,000 will not be met then all fisheries will close."

KPFA response: KPFA offers the following: If the commercial Upper Subdistrict set gillnet fisheries are similarly closed by emergency order, the set gillnet fishery may immediately reopen when the Department projects sockeye salmon escapements to exceed the mid-point of the Kasilof River sockeye salmon BEG goal or the Kenai River late-run sockeye salmon SEG in-river goal.

Note: Jeopardizing future lost production on sockeye salmon stocks by placing significant Sustained Yield Risk that produce poor sockeye returns and lost benefit of a fishery resource harms the economy of this state and all resource users that depend on these fishery resources to be maintained. The Department is directed to meet Sockeye Salmon Escapement Goals in Plan(s).

Kenai Peninsula Fishermen's Association (KPFA), offers the following comments on the Task Force meeting document referenced as "Recommendations for Proposal 249" continued:

- **[Task Force proposal language]** "On August 1, the following actions will take place:
 - (1) The inriver sport fishery will close by regulation.
 - (2) The commercial fishery will revert back to regular management plan with Department oversight to ensure late-run king salmon escapement will be met"
 - a. Amend No.2 to include reverting back to "regular management plan"

KPFA response on language: Support.

- "If at anytime prior to August 1, the Department's assessment projects an escapement greater than 15,000 SEG, restrictions shall end" (Note: Consensus on this point of the plan as written).

KPFA response: Support

Respectfully,

Robert V. Williams, President