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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

Dear Board of Fisheries Members,

Kenai Peninsula Fishermen's Association (KPFA), offers the following comments:

2013 ADF&G new information: 15,000 – 30,000 SEG goal range

- The 2013 ADF&G Escapement Goal (DIDSON) range for Kenai River Late-Run Chinook salmon recommendation is 15,000 – 30,000. The Maximum Sustained Yield range was determined (90% confidence MSY) on page 18 of the report and the MSY range is determined 13,000 – 28,000 (**Consistent with previous practice**). The 2,000 fish increase was stated in two different ways – additional opportunity (draft) report and final report as additional measure of uncertainty.

However, there is very little difference on Returns and Sustained Yields between 12,000 and 13,000 escapements – both produce similar Returns (12,000 = 44,090 and 13,000 = 46,270); Sustained Yields between 12,000 = 33,270 SY and 13,000 = 34,260 SY with exploitation rates at 39% overall harvest = 17,195 and puts 26,900 Escapement which is 90% in the upper range of 30,000 or 96% in upper range of 28,000. Please note: the upper range of 28,000 vs. 30,000 the Sustained Yields are higher 28,000 escapement with 33.210SY than a 30,000 escapement with 31,470 SY. Also, please note: 12,000 escapements and 28,000 escapements produce the same Sustained Yields!

KPFA supports the following range(s):

- KPFA supports the 12,000 – 28,000 range under the MSY goal range with high Sustained Yields (90%) referenced above for the 2013 season. Secondly, KPFA is supportive of 13,000 – 28,000 range as well. Third preferred range, 13,000 – 30,000 range - supported. A key element is

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management in-season with daily accurate escapement estimates which produces more accurate projections daily on the in-river run. Technical sonar related issues that affect the DIDSON sonar program, i.e., transducer movement, lost bank strata in a time series, imaging focus and software issues – occur and estimates are adjusted for such events. The point being, **counts are cumulative and extremely important in projecting the in-river return. The Department should take additional efforts in 2013 to make sure daily counts are timely and accurate.** Including, reducing time on technical corrections lagging over a day, days, weeks. Realizing post season higher counts that may have cost hundreds of thousands of dollars lost economic and foregone harvest benefit - unnecessarily in a one day event under a conservation issue time-frame that never existed or exists should not be acceptable. After the extreme historical and unnecessary losses taken along the East-side commercial set gillnet fishery – the Department needs to Raise the bar in all of their efforts and improve their assessment programs on operational time, manpower, and research to make sure these types of events (2012, 2011) never needlessly occur that cause unnecessary significant economic damage to fishermen, crew, families, local communities, Borough, and the state. **The sockeye salmon fishery drives our historical and traditional fishing industry. Sustaining High sustained sockeye salmon yields from the Kenai River system and Kasilof River system provide significant economic benefits to the state, Borough, citizens, and those who that depend on the fishery resources of this state.**

Respectfully,

Robert V. Williams, President