

RECEIVED
JAN 18 2008

BOARDS

Dear Members of Alaska's Board of Fish,

My name is Gary Holler. I am a set netter in Cook Inlet. I fish North Kalifonsky Beach. Which is located just south of the Kenai River. I have fished there since 1971. I received an original limited entry set net permit from the State of Alaska in 1976. I have been attending the BOF process for 25 years.

The single most important issue that the BOF will deal with at this meeting is to allow ADF&G the ability to manage to the in-river goals set by the BOF. If this was put into regulation, the BOF meeting would be cut in half.

The BOF sets in-river goals. Yet then the BOF ties ADF&G's hands by requiring them to implement windows and restricting their Emergency Order authority. The results have been disastrous for the resource. The Kenai River has exceeded its in-river goal 6 out of the past 7 years. The Kasilof River has its in-river goal exceeded 10 out of the past 11 years. The State of Alaska's Sustainable Salmon Policy 5AAC 39.222 (B) states that salmon escapements goals, whether SEG, BEG, OEG, or in-river goals should be established in a manner consistent with sustained yield; unless otherwise directed, the department will manage Alaska's salmon fisheries, to the extent possible, for MAXIMUM SUSTAINED YIELD (MSY).

The economic loss to the commercial fishermen is in the millions, with the lost harvest opportunity due to the in-ability of ADF&G to manage to the in-river goals set by the BOF. Along with this present economic loss, future sockeye production from these over-escapements will lead to poor returns to future runs. Over escapement does not lead to MSY. In fact the future for Kenai River sockeye looks mighty bleak The BOF should ask ADF&G some very hard questions concerning over escapement and its implications on returns to the Kenai River in the future.

Why does the Alaska BOF tie ADF&G's hands with regulations that does not allow them to achieve the in-river goals set by the BOF?

I support proposal 130, which states ... achieving established escapement goals is the primary management objective....

Three tiered abundant base management is not working. Since the inception of the three tiered system, in 1999, the pre-season forecast has only once matched the end of the season numbers. Once ADF&G makes it's in-season projection around July 20, and they change their projection, the management plans change and all user groups are affected. This has happened eight out the past nine years. A far better approach which was used on the Kenai River from statehood till 1999, is one in-river goal. This management worked well. I would hope that the BOF would pass proposal 189 which asks for one in-river escapement goal. The goals asked for in this proposal is an SEG of 500,000-800,000 sockeye for the Kenai River, with a in-river goal of 600,000-900,000 sockeye. This would bring stability for users and hopefully help achieve MSY which is mandated in the Sustainable Salmon Policy.

Thank you,

Gary L. Hollier
Gary L. Hollier
1-18-08

COMMENT#

46

RECEIVED TIME JAN. 18. 1:16PM

1/11/08

RECEIVED
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BOARDS

Members of Alaska Board of Fish,

My name is Gary Hollier. I fish North Kalifonsky Beach. I have fished there since 1971. I am writing to urge the BOF to pass proposal 181. It asks to expand the set net area in the Kasilof terminal fishery. The current set-net area fishes out to 600 ft. from shore. This proposal asks for an additional 600 ft. Even with this increase in area, half the time the set-nets are dry. The drift area currently under regulation lets them fish 9000 ft. from the navigation light.

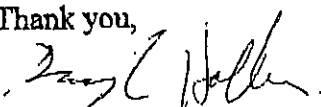
Here is a little history. The Blanchard line went into effect in 1985. The first time the Kasilof Section fished only out to the ½ mile area was 1985. The Kasilof River Special Harvest Area went into regulation in 1985. It has two purposes.

1. To harvest sockeye returning to the Kasilof River when the historic and traditional fisheries could not keep the in-river escapement from going well past it's top end. If it wasn't for "windows" ADF&G would be able to manage to the Kasilof in-river goal and therefore the terminal fishery would not have to be used, unless the lower end Kenai River sockeye goal could not be achieved.

2. 5 AAC 21.365 (b) in the Kasilof River Salmon Management plan states that "Achieving the lower end of the Kenai River sockeye salmon escapement goal shall take priority over not exceeding the upper end of the Kasilof River optimal escapement goal of 150,000 to 300,00 sockeye salmon." There are many proposals to remove this language from the Kasilof Management Plan, this should stay in regulation, especially in light of the fact that the Kenai River's sockeye return in the years of 2009 to 2012 might have a hard time meeting the minimum in-river goal. The BOF should asks some hard questions concerning the sockeye returns to the Kenai River in the future.

I would hope that the BOF fish would consider changing the disparity in fishing area in the terminal fishery.

Thank you,


Gary L. Hollier

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BOARDS

1/15/08

Members of Alaska Board of Fish,

My name is Gary Hollier. I fish North Kalifonsky Beach. I have fished there since 1971. I am writing to urge the BOF to NOT pass any proposal that seeks to add the Kasilof Section or a portion of it to the Kasilof River Special Harvest Area (KRPHA). The proposals that I oppose are 168, 170, 173, 174, 185.

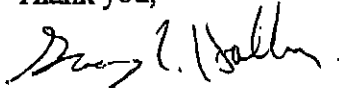
Here is a little history. The Blanchard line went into effect in 1985. The first time the Kasilof Section fished only out to the ½ mile area was 1985. The Kasilof River Special Harvest Area went into regulation in 1985. It has two purposes.

1. To harvest sockeye returning to the Kasilof River when the historic and traditional fisheries could not keep the in-river escapement from going well past it's top end. If it wasn't for "windows" ADF&G would be able to manage to the Kasilof in-river goal and therefore the terminal fishery would not have to be used, unless the lower end Kenai River sockeye goal could not be achieved.

2. 5 AAC 21.365 (b) in the Kasilof River Salmon Management plan states that "Achieving the lower end of the Kenai River sockeye salmon escapement goal shall take priority over not exceeding the upper end of the Kasilof River optimal escapement goal of 150,000 to 300,00 sockeye salmon." I oppose any proposals to remove this language from the Kasilof Management Plan (167, 168, 177, 180). 5 AAC 21.365(b) should stay in regulation, especially in light of the fact that the Kenai River's sockeye return in the years of 2009 to 2012 might have a hard time meeting the minimum in-river goal. The BOF should asks some hard questions concerning the sockeye returns to the Kenai River in the future.

With poor returns predicted for the Kenai River sockeye, in the near future, it seems that the KRPHA might have to be used to protect these stocks for all user groups. If the BOF expands the KRPHA out to ½ mile from shore in the Kasilof Section any time the KRSPHA is open the result would have serious implications on trying to achieve the minimum in-river sockeye goal to the Kenai River.

Thank you,



Gary L. Hollier
Soldotna, AK.

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1/15/08

Chairman Morris and Members of the Alaska's Board of Fish,

My name is Gary Hollier. I fish North Kalifonsky Beach, just south of the Kenai River. I have fished there since 1971. I am urging the BOF to pass one of these proposals- 80, 81, 82. These proposals asks to open the Kenai-East Forelands sections on July 1. Why does the Kenai- East Forelands section open on July 8? The drift fleet opens on June 19. The Kasilof section opens on June 25.

The Kasilof River has exceeded its in-river goal 10 out of the past 11 years. The Kasilof River has on average over 125,000 sockeye past its sonar counter by July 8 the past 10 years. Genetic reports show that the Kenai Section has harvested as high as 56% Kasilof stocks from 7/10-13 2006. 53% from 7/16-19 2005. It just stands to reason that an even higher percentage of Kasilof sockeye would be harvested in the Kenai Section from 7/1-8.

In 1985 the Blanchard Line and the Kasilof River Special Harvest Area went into regulation. 1985 was also the first year that the ½ mile in the Kasilof section was used. The set nets in the Kenai Section has since the beginning of this fishery (80 years) historically and traditionally harvested Kasilof fish.

The Kasilof River Salmon Management Plan (5 AAC 21.365) went into regulation at the 2002 BOF meeting. One of the main reasons that BOF member Dan Coffey pushed through this plan was to try to get some equity in fishing time for the Kenai and East-Forelands sections. In 2000 and 2001 these sections fished a total of 5 days, for each season. The original Upper Cook Inlet Management Plan that went into regulation in 1978 opened the Kenai and East-Forelands sections on July 1. Opening the Kenai and East-Foreland section, on July 1 would certainly help create a better balance in fishing times between the Kenai and Kasilof sections.

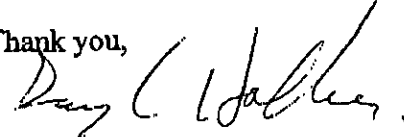
The Kenai River has gone over its in-river goal 6 out of the past 7 years. There might some Kenai River sockeye in the area also. Why not have a chance to harvest some K.R. stocks also.

ADF&G has indicated that around 200 Chinook salmon would be harvested with this early opening. The trawl fishery harvests 100,000 king salmon. The Kenai Section is losing historical and traditional fishing time over a potential harvest of 200 king salmon.

There is a Kenai River Late Run King Salmon Management Plan. If there is a problem achieving the minimum 17,800 BEG, restrictions could be implemented later in the season. This has never occurred.

I would urge the BOF members to look at the proposals, and see how they were written. They all have good information. It makes no sense in not opening up these areas to their traditional and historic opening date.

Thank you,


 Gary I. Hollier
 Soldotna, Ak.

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1/16/08

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Alaska Board of Fish Members,

My name is Gary Hollier. I Fish North Kalifonsky Beach, just south of the Kenai River. I have fished there since 1971. I am urging the BOF to pass one of proposals 83, 84, 85. This group of proposals asks for a later closing date for set-nets in the East-Side Set Net (ESSN) fishery. Current regulation closes the fishery on August 10. These proposals asks for a closing date of August 15. This was the original closing date for the ESSN fishery in 1978 with the writing of the first Upper Cook Inlet Management Plan.

The ESSN fishery harvest 3% of the total Kenai River coho run. If the season was extended the ESSN fishery would harvest minimal coho numbers (3000?). Hopefully by the BOF meeting ADF&G will have the estimate of what the coho harvest would be with a 5 day extension.

I have enclosed a chart showing the sockeye escapement into the Kenai River after August 1 and after August 10. The data came from ADF&G. The August component from 1978-1999 average was 16%. From 2000-2007 the Kenai River sockeye component has increases to 31%. From 2004 to 2007 almost 300,000 sockeye have escaped into the Kenai River after August 10. Six out of the seven years the Kenai River has exceeded its in-river goals set by the BOF. This is a economic travesty. The ESSN fishery should have the ability to harvest this wasted resource.

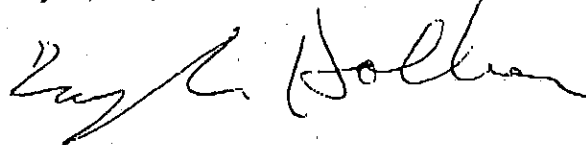
Along with the lost harvest opportunity in those years, there is a double hit to the commercial fisherman as large over escapements were associated "with below average returns per spawner from brood years....". This statement comes from the Biological and Fishery -Related Aspects of Over escapement in Alaskan Sockeye Salmon. It appears the from 2009 to 2012 the sockeye returns to the Kenai River are in real dire straits. This is probably the biggest discussion the BOF can have with ADF&G at this meeting. Kenai River production is falling on its lips. All user groups will be impacted. The BOF should ask ADF&G exactly what are the consequences of going over the in-river goal year after year.

Along with lost sockeye harvest opportunity, the ESSN fishery is losing the ability to harvest millions of pink salmon in even years. Why shouldn't these pink salmon be harvested?

It should be noted that probably 50% of the ESSN fishery would not participate in this extension. Therefore less coho's would be harvested, but more importantly the fishermen who do fish would be able to make some money. This extra 5 day fishery will be very important in the future, as it might take till August 10, to achieve the minimum in-river goal.

The BOF has given commercial fisherman the priority on reds and pinks. I would urge the BOF to pass one of these proposals as the economic benefits for harvesting hundred's of thousands of pink and red salmon is a huge trade off for a small harvest of coho's.

Thank you, Gary L. Hollier Soldotna, Ak.



(see attached graph)

RECEIVED TIME JAN. 18. 1:16PM

SENT#

46

ATTN: BOF Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907.465.6094

To: Members of the Alaska Board of Fish
Re: Proposal #143

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JAN 18 2008
BOARDS

January 18, 2008

My name is Trevor Rollman, son of Thomas M. Rollman. Our family has been set-netting at 7 Egg Creek, near Moose Point on Cook Inlet, for nearly 40 years, and for 30 of those years, since I was one week old, I have been a participant. I am writing in support of proposal #143, because of the following reasons, and additionally, the passage of this proposal will allow for me to be able to meaningfully and sustainably carry on this traditional way of life that I love with my dad and brothers and our families in years to come.

- 1) At present, the Eastern Sub-district of Cook-Inlet's Northern District is managed as the Northern District, based primarily on escapement numbers to the Yentna River. This is inappropriate due to the fact that very few Yentna/Susitna fish run up the east side beaches of the Northern District.
- 2) There are only FIFTEEN (15) permits being utilized in the Eastern Sub-district of the Northern District. If these permits were to be fished for a total of 24 hours a week starting in July (which is the current regular schedule, but is being restricted to roughly half that amount of time consistently each season for over 10 years now), that would mean that the waters of the East side of the Northern District would be free and clear of commercial gear over 85% of the time, not including the several week period in June when no fishing is permitted. Thus, the impact that the Eastern Sub-district of the Northern District can possibly be having on the escapements of ANY of the spawning streams in the Northern District, let alone the Yentna and Susitna rivers, can't possibly be a threat to the health of those streams with respect to sockeye salmon populations. It is my understanding that ADF&G agrees with this conclusion regarding the sockeye return to the spawning streams of Turnagain Arm, which are now stronger than ever.
- 3) Proposal #143 is NOT asking for ANY additional fishing time. This proposal asks that the Eastern Sub-district be allowed to fish only the two (2) twelve (12) hour periods a week traditionally allotted to it, without intentional direct intervention by ADF&G to shut it down. The traditional management is PASSIVE, not requiring any extra attention by the Department aside from standard monitoring practices.
- 4) Passage of Proposal #143 is an opportunity for the Board of Fish to help a struggling and economically depressed group of fishermen who love their lifestyles and depend on the revenue they derive from their labor, which has

practically no impact on, and does NO HARM to the resource or any other fishing group.

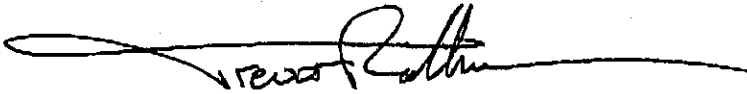
- 5) Getting fish to market on the East side of the Northern District is not an issue, as fish can be trucked to markets in the Kenai area, which is the traditional and long-standing method used. This provides a consistent, reliable supply of fresh fish to fill those markets.

Without the passage of Proposal #143, the current pattern of closures in the Northern District will not cease. These closures have a drastic effect on us fishermen of the Eastern Sub-district of the Northern District. It makes our fishery an unreliable source of income, and if continued will destroy our way of life as we know it by making it economically impossible to maintain our fishsites and keep fishing.

I am looking forward to raising my children in the same way that I was raised: set-netting at 7 Egg Creek in the summertime. I cannot over-emphasize the importance of this to me, and I know that the other families whom I have grown up with as fishing neighbors feel the same way. Passage of Proposal #143 will allow this dream of raising my family at our fishsite and earning a respectable, sustainable, honest living from the land to be a reality for me.

I implore you to reasonably consider the rationality of this proposal and allow us to carry on with our way of life and our business by helping pass Proposal #143.

Thank You,
Sincerely,



Trevor E. Rollman
1945 H. St.
Springfield, OR 97477
541.746.5168



RECEIVED
JAN 18 2008
BOARDS

Matanuska-Susitna Borough, 350 E. Dahlia Avenue, Palmer, AK 99645



FAX

Date: 01/18/2008
Number of pages including cover sheet:6

To:	Olivia
Company:	
Phone:	907-465-4110
Fax:	907-465-6094
From:	Kathy Rocci
Company:	MATANUSKA-SUSITNA BOROUGH
Phone:	907-745-9557
Fax:	(907) 745-9669

Comments:

Olivia,
Per our conversation today, here is Matanuska-Susitna Borough Resolution No. 08-005 pertaining to Salmon Escapement that our assembly member Tom Kluberton asked to be sent.

Can you please make a copy for each of the members on the Alaska Board of Fisheries.

Thanks so much

IF YOU DID NOT RECEIVE ALL PAGES, PLEASE CALL 745-9688 AS SOON AS POSSIBLE.

RECEIVED TIME JAN. 18. 2:31PM

COMMENT# 48

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JAN 18 2008

Action: 01/15/08 ^{BOARDS}

MATANUSKA-SUSITNA BOROUGH
RESOLUTION SERIAL NO. 08-005 (AM)

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH ASSEMBLY REQUESTING THE ALASKA STATE DEPARTMENT OF FISH AND GAME (1) RECOMMEND TO THE BOARD OF FISHERIES THAT SOCKEYE AND CHUM SALMON STOCKS OF THE SUSITNA (YENTNA) RIVERS AND FISH CREEK BE DESIGNATED STOCKS OF CONCERN"; (2) PREPARE A PLAN FOR SALMON ESCAPEMENT ENUMERATION; (3) ESTABLISH ESCAPEMENT GOALS FOR ALL SALMON SPECIES OF THE NORTHERN DISTRICT; AND (4) SUPPORT THE ENACTMENT OF THE SUSTAINABLE SALMON POLICY INTO STATE LAW.

WHEREAS, the commercial harvest of sockeye salmon from the Northern District of Cook Inlet (NCI) has declined from an average of 180,000 in the 1980's to an average of 26,000 sockeye since 2002; and

WHEREAS, the commercial harvest of Upper Cook Inlet chum salmon has declined from 880,000 annually in the 1980's to fewer than 100,000 salmon during recent years; and

WHEREAS, spawning escapements for Susitna River sockeye have fallen below the minimum goal in five of the past seven years; and

WHEREAS, Fish Creek sockeye escapement thresholds have not been achieved over half of the time over the past ten years; and

WHEREAS, there are no escapement targets for chum salmon in NCI; and

WHEREAS, sport fisheries have been subject to continuous restrictions such as the prohibition of harvesting of sockeye over the past four years; and

WHEREAS, Northern Cook Inlet set net fisheries have had one or more closed fishing periods in each of the past seven years (except

2003); and

WHEREAS, commercial drift net fishing periods have been restricted annually since 2001; and

WHEREAS, chronic inability to maintain both minimum spawning escapements and expected harvests has occurred despite continuous restrictions on the fisheries; and

WHEREAS, the State's Sustainable Salmon Policy falls short of its potential by being regarded as a set of recommendations rather than clear legislative direction and as such being too easy to set aside, as management decisions are made; and

WHEREAS, genetic stock identification studies are in mid-course and other Susitna Basin fishery investigations are also in progress, the number of issues cited herein indicate further action is in order; and

WHEREAS, closures, restrictions and related regulatory actions have had, and will continue to have, significant social and economic impacts on Alaskans who rely on these resources.

NOW, THEREFORE, BE IT RESOLVED, that the Matanuska-Susitna Borough Assembly requests that the Alaska State Department of Fish and Game (ADF&G) recommend to the Board of Fisheries (with Governor's Office Support) that sockeye and chum salmon stocks of the Susitna (Yentna) Rivers and Fish Creek be designated "stocks of concern", specifically yield concerns, as mandated by the Sustainable Salmon Policy (5AAC 39.222); and

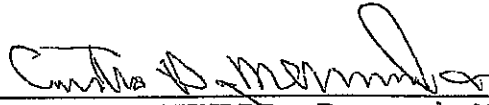
BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly requests that the Legislature, with the support of the Governor, fund the development and application of technology that will assure acquisition of multi-species escapement information for Susitna (Yentna) River and Fish Creek salmon with emphasis on sockeye, coho, and chum in that priority. This includes providing on-going funding for enumerating coho salmon at the Deshka Weir; and

BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly requests ADF&G to prepare a phased enumeration plan, with cost estimates showing the funds needed to add each species beyond sockeye to the project. The development of an all-species enumeration project plan and cost figures by phase will allow the Legislature and the Governor to decide the extent to which studies will be cost-effective given the current fiscal environment; and

BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly considers it essential that escapement goals ultimately be established for all salmon species of the Northern Cook Inlet. It is acknowledged that it could require as much as seven years of capturing escapement counts (per above) to gain sufficient knowledge in support of establishing those goals; and

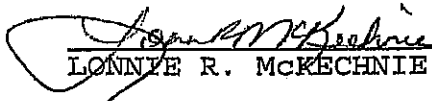
BE IT FURTHER RESOLVED, that the Matanuska-Susitna Borough Assembly requests that the ADF&G and the Governor support legislative action to enact into statute (and/or regulation as appropriate) a codified version of the Sustainable Salmon Policy.

ADOPTED by the Matanuska-Susitna Borough Assembly this 15 day
of January, 2008.



CURTIS D. MENARD, Borough Mayor

ATTEST:



LONNIE R. MCKECHNIE, Acting Borough Clerk
(SEAL)

PASSED UNANIMOUSLY: Woods, Houston, Church, Bettine, and Kluberton

RECEIVED

JAN 18 2008

BOARDS

Ronald T. Stanek
3623 Lynn Dr.
Anchorage, AK 99508

January 18, 2008

Mr. Mel Morris
Chairman
Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811

RE: 2008 Upper Cook Inlet Northern District Salmon Management Plan Proposals 141-150

Mr. Chairman:

My family and I have resided in Alaska since 1978. I began commercial fishing as a crew hand in the Northern District in 1982. I and members of my family have held a Cook Inlet Salmon Setnet Permit since 1985. We have fished this permit in both the Northern District where we began fishing on leased sites near the Susitna River in the summer of 1985, and in the Central District eastside beaches. Until such time as regulations required permit registration in only one district of the Cook Inlet management area, we fished our permit in both the Northern and Central districts based on economics and salmon run timing.

Subsequent to the area registration requirement, we located our fishing operations near Kenai and fished our permit in the Kenai Section north of the Kenai River where we established leased sites. Although we have held site leases in the Kenai area, we were not precluded fishing in the Northern District provided the permit was appropriately registered. In some years we have made the choice, based on economics and time constraints, to register the permit and fish it in the Northern District. Economic factors have included the annual prices paid for salmon, available markets, buyers and tenders, cost of fuel and operations, and availability of crew hands. **More importantly, however, the number of open periods has severely impacted all economic factors by limiting the likelihood of harvesting available fish allocations, particularly Chinook salmon.**

I strongly support Proposals 141 through 150, except 148, as they provide for greater flexibility in managing Northern District fisheries and add substantially more opportunity for fishers to reach harvest objectives. Proposal 148 increases gear mesh size in the Chinook fishery. Although I have personally never fished mesh larger than 6 inch, I have spoken to many long-time fishermen who have fished "king gear" in earlier years and they all stress the reduction in loss of large fish that are not effectively gilled in small mesh. I have experienced the loss of large kings while pulling my smaller mesh nets. Kings are too often caught by one or two processes on the head or by the teeth and fall out as the net as it is being pulled, and therefore I would support an increase in mesh size for the Chinook fishery.

I would also like to emphasize that a significant contribution could be made to the local economy by improving management flexibility and harvest opportunity in the Northern District fisheries. Although many households in Anchorage obtain fish through recreational means, a larger group has no opportunity to harvest salmon but do enjoy the dietary and culinary benefits of eating salmon that they obtain by purchase through commercial markets. There is also a large tourist population the annually visits Anchorage and enjoys dining in local restaurants serving locally caught salmon. This is only possible if local commercial fishermen provide fish for this market. Lastly, the small number of commercial fishermen currently fishing in the Northern District could become more efficient in utilizing the salmon resource allocation if the above mentioned proposals were adopted into regulation.

Sincerely,


Ronald T. Stanek

RECEIVED TIME JAN. 18. 4:31PM

COMMENT# 49

JAN 18 2008

BOARDS

Chairman Morris and Members of the Alaska Board of Fish,

I am strongly against proposal #206. This proposal has been submitted by ADF&G. ADF&G staff feels that this proposal does not have allocative implications. This is a highly allocative proposal. Why would the ADF&G submit such a proposal? If the in-river 650,000 sockeye goal is not going to be met, then ADF&G wants to be able to lower the bag and possession limit on sockeye so the fishery would not be shut down.

5 AAC 21.360 (a), Kenai River Late-Run Sockeye Salmon Management Plan, states the department shall manage the Kenai River late-run sockeye salmon PRIMARILY for commercial uses.....

The commercial fishery is restricted if ADF&G can not predict meeting the minimum 650,000 goal. This scenario happened in 2000 and 2001. The Kenai and East-Forelands sections were shut down after fishing only 5 days each year. In 2000 the last day to fish was July 20. The set-nets were closed until the minimum in-river goal could be met. This never did happen. If the minimum in-river goal was achieved then the commercial fishery would have re-opened.

With continued over escapements into the Kenai River 5 out the past 6 years, it appears that there will be a substantial loss in production from the over escapements the past 6 years.. With that occurring it might be hard to make the in-river goal. If this happens the commercial fishery will be restricted or closed. If this happens and the sport fishery is allowed to continue fishing, it appears to me that this is an allocative proposal

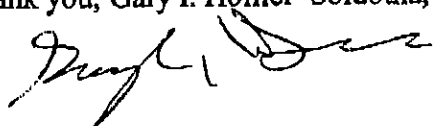
The problem with proposal 206 if passed, the in-river sport fishery would be harvesting sockeye below the sonar counter. Thus every sport caught fish is one less fish making it to the sonar counter. For every fish harvested in-river, below the counter, the longer that the commercial fishery sits on the beach. This happened in 2001. The ESSN fishery was closed down on July 26. The sport fishery continued fishing. The in-river sonar count ended up at 650,036 sockeye. The sport harvest above the sonar counter was 149,000. The sport harvest below the counter was 51,000 sockeye. The minimum 500,000 OEG was exceeded by 1036 sockeye. The sport fishery continued through the season. The commercial fishery never did get back in the water, as the 650,000 minimum in-river goal was not met until August 13. If the sport fishery would have been restricted below the sonar counter, the commercial fishery would have been able to fish a couple days at the end of the season.

ADF&G wants the OEG to be met without the disruption of totally closing the sport fishery. On runs under 2 million to the Kenai River, why doesn't ADF&G have the sport fishery start with a 2 fish bag limit. Once the minimum in-river goal is reached, then raise the sport fish bag limit.

I have been going to the BOF meetings for 25 years. Whenever there is an allocative proposal ADF&G is always neutral. Why then has ADF&G submitted such a allocative proposal. The net effect is that this proposal hurts commercial fishermen ability to harvest sockeye, when they have the priority on them.

ADF&G with their review of the Cook Inlet proposals supported only 2 commercial fish proposals 100% (171, 206). The rest of the proposals they considered allocative and were neutral. I would hope that the BOF would not pass proposal 206 or amend this proposal.

Thank you, Gary I. Hollier Soldotna, Ak.



RECEIVED TIME JAN. 18. 4:24PM

COMMENT# 50

JAN 18 2008

BOARDS

UNITED FISHERMEN OF ALASKA



211 Fourth Street, Suite 110
 Juneau, Alaska 99801-1172
 (907) 586-2820
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January 18, 2008

ATTN: BOF COMMENTS
 Alaska Department of Fish and Game
 Boards Support Section
 P.O. Box 115526
 Juneau, AK 99811-5526
 Fax: 907-465-6094

RE: Upper Cook Inlet Board of Fisheries Proposals

Dear Chairman Morris and Board of Fisheries members,

United Fishermen of Alaska (UFA) represents 37 Alaska commercial fishing organizations, participating in fisheries throughout the state and its offshore waters. At our October 2007 board meeting the UFA Board confirmed the fishing community's support for use of the best available scientific management measures to achieve and maintain optimum sustainable fishery resources. UFA feels strongly that the health and optimum sustainability of Alaska's fishery resources results from the use of the science based tools that have been developed as part of Alaska's fishery management. The use of these tools should not be jeopardized through restrictions on the management authority of the Department of Fish and Game. In support of our commitment to healthy and optimum sustainable fisheries management, which promotes healthy commercial fishing communities, the UFA Board adopted the following principles for salmon fisheries management, and submits these positions as comment on Upper Cook Inlet proposals:

UFA strongly supports:

- Escapement goal management based on proven biological principles. Optimum sustainable salmon fisheries should be managed with the prime objective to provide escapements that are within scientifically established upper and lower ***biological escapement goals***.
- Adaptive and abundance based management through the local area managers.
- The unencumbered use of the Commissioner's EO authority for fishery management. This is integral to the successful management of a sustainable resource and should not be limited or curtailed within any salmon management plan.
- Mixed stock management is a complex task in any salmon management plan. The Board of Fisheries and the Department of Fish and Game are responsible for

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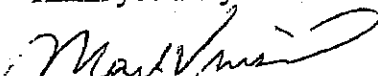
achieving the long-term optimum sustainability of our salmon resources, while protecting commercial fishing communities.

In accordance with these principles, UFA strongly opposes all arbitrary restrictions and actions that unduly and improperly limit the State's fishery managers from achieving biological escapement goals. We especially object to closed "window" periods within normal fishery seasons; they deny managers the necessary flexibility to make real time fishery management decisions, leading to lost yield and overescapement.

Additionally, season opening and closing dates must be flexible and allow fishery managers to achieve the optimum yield from the resource. Mandatory opening and closing dates are arbitrary, without scientific basis, and contribute to overescapement and lost yield; therefore, mandatory season opening and closing dates should be carefully scrutinized to ensure that biology and not politics open or close a fishery. UFA strongly opposes arbitrary season opening and closing dates.

We ask that you carefully consider all the proposals before you, and reject those that interfere with the Department of Fish and Game's ability and flexibility in managing fisheries sustainably.

Thank you for your consideration of our position,


Mark Vinsel
Executive Director

UFA MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Draggers Association • Alaska Independent Tendemmen's Association • Alaska Longline Fishermen's Association
Alaska Scallop Association • Alaska Shellfish Association • Alaska Trollers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve
Cape Barnabas Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Crab Group of Independent Harvesters • Douglas Island Pink and Chum • Fishing Vessel Owners Association • Groundfish Forum
Kenai Peninsula Fishermen's Association • Kodiak Regional Aquaculture Association • North Pacific Fisheries Association
Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Sitka Herring Association • Southeast Alaska Fisherman's Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners Association • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Cook Inlet Drift Association • United Salmon Association • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association • Western Gulf of Alaska Fishermen

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ADF&G
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P.O. Box 25526
Juneau, AK 99802

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BOARDS

Dear Board of Fisheries members,

The Alaska Sportfishing Association offers its comments as follows on selected 2008 Upper Cook Inlet proposals.

Proposal 77-Support as the current regs do not adequately protect Kenai sockeye stocks when they are the weaker stock. Moving the northern boundary of the Kasilof fishing area should provide for more targeted fishing on Kasilof stocks and reduce the interception of Kenai sockeye when set netters are fishing for Kasilof sockeye.

Proposal 79- Oppose as this proposal, if adopted, would reduce protection of non-targeted salmonoids. The current regs provide for fishing dates that historically work for harvesting sockeye which is the primary focus of UCI commercial fishing. The saltwater harvest of the non-targeted species (chinook and coho) are somewhat minimized with the current schedules which is the Board's intent.

Proposal 80- Oppose as this proposal not only asks that the commercial fishing season be lengthened by about two weeks as in the previous proposal but also wants to eliminate "windows" which are critical to providing for genetic diversity of the run as well as providing in-river fishers some certainty of harvest.

Proposals 81, 82, 83, 84, 85, 86, 89, 90, 93, 94, 96, 97 and others-Oppose for the same reasons noted in #79 above. These proposals would significantly modify the delicate balance of allocation of UCI fish by significantly increase commercial fishing pressure on the mixed fish stocks.

Proposal 87- Support as this would clarify the agreement discussed between the various user groups in the 2005 meetings.

Proposal 88- "Harvesting sockeye salmon allows for improving the quality of the resource and products produced" I must have missed something here. This classic statement needs to be enshrined into Board history as ?????.

Proposal 95- Oppose as the current schedule of Monday and Thursday provides the commercial fishers with ample opportunity to harvest the sockeye resource with their traditional two fishing periods weekly. The Thursday opener (instead of Friday), along with windows, usually allows some sockeye to enter the in-river fisheries when many of the recreational fishers have the opportunity to harvest their fish.

Proposal 106- We oppose any deepening of gillnets period!!

Proposal 116- Support because it seeks to revise UCI salmon management to reflect the needs of a couple hundred thousand southcentral Alaska anglers. The huge numbers of recreational anglers mandates that they be provided access to more fish.

Proposal 117- Support as it better defines that escapement goals should met with the counting of wild fish only. Including hatchery stock in the counts usually clouds the real number of wild fish returning and might result in over harvesting wild stocks. Also see proposal 123.

Proposal 119/120- Support these two proposals as they highlight the distressed returns to the Northern District. As an example, in 1977 (only 30 years ago), there were 1,233,436 chums harvested and last year the harvest was a paltry 74,926. The Board needs to address the current unacceptable low salmon returns to the Mat-Su.

Proposals 121/122- Support as these complimentary proposals ask that a revised in-river goal be established for Yetna sockeye which would take into account some harvest by in river recreational and subsistence users.

Proposal 123- Support as we need to get a handle on Fish Creek wild stocks and not muddy the situation with hatchery fish..

Proposal 125- Oppose because under all the smoke and mirrors is the reallocation of the fish resource away from the recreational and personal use fisher

Proposal 132- Support as it provides for readdressing several salmon management plans with the intent to make concise direction to staff on implementation priorities.

Proposal 133- Oppose as it institutes a commercial fishing priority for UCI.

Proposals 134, 135, 136, and 137- Oppose as they want to eliminate the coho priority currently provided to in river users.

Proposals 138 and 140- Support because they clarify priorities of escapement attainment in the Kenai and Yetna rivers.

Proposals 141 and 142- Oppose as these proposals might increase commercial fishing effort on Northern District coho which are to be fished primarily by in river fishers.

Proposals 147 and 150- Oppose as this commercial chinook fishery was initiated as an experimental fishery years ago as a way to gauge the strength of the run. For that reason, the regs also contain a harvest cap so as to not exploit the run which is to be managed for in river users.

Proposals 154, 155, 156, 157, 158, and 159- Oppose any increased commercial fishing opportunities for pink salmon as the economic value is minimal and the bycatch opportunity is high.

Proposals 160, 161 and 162- Oppose these attempts to eliminate/modify the current drift management plans.

Proposal 164- Support because this proposal fixes an omission in the regs for August fishing.

Proposal 165- Support this proposal as it reinstates the commercial fishing times that were modified at the last Board meeting.

Proposals 166, 167, and 168- Oppose as they would significantly modify the Kaslof plans and not include the needs of in river users in the changes.

Proposal 169- Support because it would realistically update the Kaslof River Management plan.

Proposal 176- Support as it asks for "windows" to provide for more protection for Kaslof Chinook.

Proposal 177- Oppose as this would state that the Kaslof River sockeye harvest would be a commercial priority.

Proposal 180, Oppose as it seeks to repeal the Kaslof salmon plan

Proposal 186- Oppose as it seeks to significantly modify the plan

Proposals 187, 188, 189, 190, 191, 192, 195, 196, 197, 198, 199, 201, 205, and 209. Oppose as these proposals seek to revert to old and outdated management plans for Kenai sockeye.

Proposal 202- Support as this proposal strengthens the windows concept and provides direction on lower run strengths.

Proposal 203- Support as I wrote it! Seriously, the majority (60%) of Alaskans can access the UCI salmon fisheries because of the road system. Since Alaska's fish should feed Alaskans and most these Alaskans are recreational and personal use fishers, they should have a first shot at their resource. As former Governor Knowles said "The best and highest use of Alaska salmon is on an Alaskan dinner table."

Proposal 204- Oppose This provides direction to staff that is most important.

Proposals 206, 207, and 208- Support as these proposals seek to provide in river fishery managers with additional tools to manage the bag and possession limits of sockeye during both low and high return years. 207 and 208 also allow for additional harvest for in river anglers similar to additional fishing periods currently allowed the commercial industry.

Proposal 210- Oppose. Commercial fishing on Russian River stocks is currently not permitted because they decimated the run 30 years ago. So let them go after the Russian fish again with improved gear and do it again? I think NOT. Also, how do you determine the number to harvest in the Inlet and then divide by half when the remunerator is 10+ days upriver and any overharvest can't be corrected?

Proposals 211 and 212- Oppose but if we can start the commercial fishery when there are 450,000 sockeye passed the counter, I will reconsider

Proposal 215- Support as this allows more equitable sharing of large runs of fish. The commercial guys get extra periods, the in-river rod and reel fishers get a higher bag limit and we dippers can harvest more too.

Proposals 217, 218, 219, and 220- Oppose because they would restrict the personal use fishery unnecessarily.

Proposals 221, 222, and 223- Oppose as these motor restrictions are obscene. We agree that 2 stroke motors are "dirty" but so are drift boat and set net skiff engines. So ban one; ban them all!!

Proposal 224- Support this as a method of personal use fishing but are concerned with possible enforcement problems.

Proposal 234- Support should escapement numbers allow additional recreational fishing opportunity.

Proposal 237- Support this proposal as it applies to lakes and ponds and not flowing rivers.

Proposals 238 and 240- We support these proposals as they will provide (sounds like our favorite word?) additional protection to spawning local fish.

Proposal 239- Support as it provides more fishing opportunity with minimal loss of rainbows.

Proposal 246- Oppose as it overly restricts fishing and limits opportunity.

Proposal 249- Support as a conservation measure.

Proposals 250 and 251- Support as they would increase opportunity

Proposal 253- Oppose these unnecessary restrictions

Proposal 254- Support this proposal which may help young fishers want to fish more.

Proposals 255, 256, 257, and 258- We support these proposals to increase the size maximums and or bag limits for jacks

Proposal 261- Support as this proposal might allow releasing more "smaller" female kings.

Proposals 263 and 264- Oppose because we don't believe that the slot limit is working as intended so why continue it?

Proposal 265- Support as housekeeping but suggest eliminating slot limits so this subject would not be relevant.

Proposal 267- Oppose as it would permit using bait and increase harvest of first run kings without regard to run strength.

Proposals 268 and 269- Support as they would increase spawning area fishing closures to better protect the fish.

Proposals 270 and 271- Oppose as the current management tool of EO provides additional opportunity when the run is strong enough to support additional pressure.

Proposal 273- Oppose as it would eliminate crucial language in the late run king salmon management plan.

Proposals 275, 276, and 277- Oppose these proposals as they discriminate against non-residents. There are other ways.

Proposal 278- Oppose. This idea has been around the circle several times in the past and rejected because it is akin to snagging which is not allowed in fresh water.

Proposals 279, 280, and 281- Support as the coho are no longer a stock of concern so there is no good reason to maintain the lower harvest limit.

Proposals 283, 284, 285, 286, 287, 288, 289, and 290- Oppose as this would seriously reduce the numbers of boats in the water and fishing effort.

Proposal 290- Oppose unless this applies to all boats from the mouth at Cook Inlet to the terminus at Kenai Lake. This restriction would apply to both recreational and commercial fishing boats alike.

Proposals 291, 292, 293, 294, 295, and 296- Oppose as I feel that the restrictions noted in these proposals are within the authority of State Parks and not the Board. State Parks has already issued their guidelines so any action on these proposals might be a waste of time.

Proposal 298- Oppose as enforcement would divert officers from more important responsibilities.

Proposals 303, 304, 305, 306, 307, 308, 309, 310, and 311. Oppose these proposals as they want to restrict guided fishing activity in some way or another. Yes, there are lots of guides on this crowded river. However, not all Alaskans own a river boat and many hire guides to take them fishing. Many, many non-residents also use guides. And if you were on the crowded river, who would you want next to you- an accomplished boat driver like a guide or Joe six-pack?

Proposals 311 and 312- Oppose. So the guides work 5 days a week and cannot fish with clients aboard. Why can't they fish for their personal use just like a non-guided angler?

Proposals 313, 314, 315, and 316- Oppose as these limit the activities of a legitimate seasonal business. I suppose that they would be OK if commercial fishermen were also restricted to one fishing period a week thus reducing effort in the same proportion as limiting a Kenai guide to one party a day.

Proposals 317, 318, and 319- Oppose --- how can enforcement be effective trying to work this?

Proposal 329- Support because consistent regulations between state departments is desirable.

Proposals 330, 331, 332, 333, and 334- Support as conservation measures to allow rebuilding of Alexander Creek Chinook.

Proposals 335, 336, 337, and 338- Suggest no action as these proposals assume Deshka Chinook escapements that will exceed the escapement range. In fact the 2007 escapement was not even 60% of the long term average and the forecast for 2008 is for another less than average run.

Proposal 339- Support if the weir remains operational and provides in-season management data.

Proposal 341- Support as these dates are more reflective of harvest opportunities for Chinook.

Proposal 342- Support if ADF&G feels that stocks are strong enough to permit harvesting an additional fish.

Proposal 346- Support since the run strength has improved and can withstand additional harvest.

Proposal 348- Support as this action would increase angler opportunity.

Proposal 349- Support if ADF&G agrees that fish populations in Big Lake have recovered and can be sustainable with an increased harvest.

Proposals 352, and 353- Support the five line limits on pike infested lakes.

Proposal 356- Oppose as dip net fisheries are intended for sockeye harvest. Those creeks that are named either have no sockeye returns or not enough sockeye to allow dipnet fishing pressure.

Thank you for your time and I hope to speak with you at the meeting.

Phil Cutler, President
Alaska Sportfishing Association