

Public Comments for Upper Cook Inlet Finfish Meeting

February 20-March 5, 2011

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ATTN: BOF COMMENTS

Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 2265 AAC57.121

I have been a property owner at the base of hole #3 on the Kenai river for the last 10 years, and have witnessed the damage caused to the bank during king season by the boats lining up 6 or 7 deep for a drift though hole #3 and then powering up within 10 to 15 feet of the bank to go up for another drift over and over again causing a large and constant wake erosion day after day. For this reason and the arguments below

I would like to speak in favor keeping the Killey River King Salmon closure and boating restrictions as presently restricted and AGAINST the change as proposed in Proposal 226.

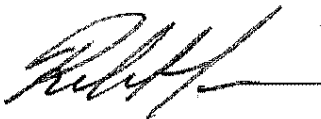
If the goal is to create a safe haven for the King Salmon to rest without harassment before moving up the river to spawn then any change in the present regulation will endanger that goal. We have personally witnessed the MAYHEM that occurs on July 15th when the hole reopens to King fishing, as has been witnessed in past years. Multiple fish are caught by guide boats as well as local fisherman floating through the hole. Catch and release of slot fish takes place however when caught multiple times there survivability decreases and the ability to move up river and into the tributaries to spawn is jeopardized.

If the issue is to allow seniors, handicapped and youth to fish from a boat for red salmon then lift the fly fishing restriction and include single hook lures (which is easier to fish than flies) and allow fishing from a boat anchored no more than 10 feet from shore.

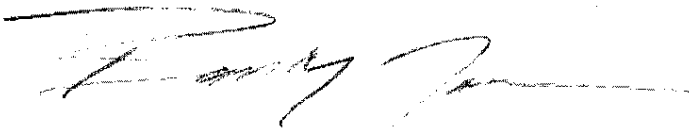
If the goal is for seniors, handicapped and youth to fish for King Salmon then Hole #1 and #2 are available to them where slack water is also accessible for fighting fish. Presumably if they are capable of fishing from a boat in hole #3 then that boat surely is capable of moving up or down the river to another fishing location.

If the goal is for "Youngsters in flimsy aluminum or inflatable boats who can safely play and fish in the calm water of Hole #3.", as outlined in one of the proposed benefit, should we be encouraging youth to fish from flimsy and presumable other forms of unsafe water craft anywhere on the Kenai River?

I therefore respectfully encourage you to maintain the restrictions as presently written in the 2010 Fishing Regulations, (with perhaps the exception of lifting the fly fishing only regulation and allow single hooks lures to be fished from a boat a boat anchored no further than 10 feet from shore).



Robert Janes



Bamby Janes

Larry M. Rozak
P. O. Box 1179
Homer, Alaska 99603
Tele: 907-398-1062

September 28, 2010

ATTN: BOF COMMENTS for Proposal 111 at the 2011 Session in Anchorage.
Alaska Dept. of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

I support Proposal 111 to extend the weekly fishing periods in Upper Cook Inlet from the current 7:00 A.M. to 7:00 P.M. to a longer period of 7:00 A.M. to 10:00 P.M. to help create a fairer amount of fishing time for shallow water beach nets versus the outer deep water setnets. I have fished on Kalgin Island for the last 37 years and have been totally frustrated by having all of my regular setnets dry for five hours each fishing period on all fishing periods that have a +2.0 low tide or lower; a condition that exists on all fishing periods, except four fishing periods that fish hold over tides. I have tried to fish low water nets repeatedly but with little or no success because the water goes out 3000 to 6000 feet across extensive mud flats that surround much of Kalgin Island.

To make matters worse, one-third of each years fishing periods have a top of the flood tide that is near the 7:00 start or stop fishing time which eliminates about two hours of each periods best fishing time. For example; if I have a 7:00 A.M. top of the flood tide in the morning, then I will have all 6 nets in my boat set by 7:30; but the evening tide is always about one hour later than the morning tide which means a 8:00 P.M. top of the flood high tide and a loss of one hour of fishing time plus I must start pulling my 6 nets about 6:15 P.M. to make sure I get all nets picked and pulled by closing time of 7:00 P.M.

This means that I must fish with 30% to 40% less quality fishing time than a group of deep water setnets that never go dry. While I can't do anything about the missing five hours of low water fishing; the extension to 10:00 P.M. would assure me of fishing three more hours and would give me the missing two hours of fishing time that occurs near 7:00 on many of my fishing periods.

I would also like to point out that a large number of emergency orders already occur each year that extent the evening 7:00 P.M. fishing time to 10:00 P.M. for eastside setnet and drift fishermen, but these emergency orders have never extended the Kalgin Island sub-district. This change would be very important for Kalgin Island fishermen and would lesson the need for emergency orders in other areas.

Sincerely,



Larry M. Rozak

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Larry M. Rozak
P. O. Box 1179
Homer, Alaska 99603
Tele: 907-398-1062

September 28, 2010

ATTN: BOF COMMENTS for Proposals 117 and 118 at the 2011 Session in Anchorage.
Alaska Dept. of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

I support Proposals 117 and 118 to allow Cook Inlet setnet fishermen to fish two entry permits and a maximum of 210 fathoms total. This would greatly increase the number of high school and college kids that would like to fish a couple of years as crew fishermen but can't afford an entry permit to fish under the current system. I have setnet fished on Kalgin Island for the last 37 years and earlier fished 13 years near Ninilchik as part of a family fishing operation. During all those years, only a couple of fishermen have been hired as crewman with no entry permit, because the 105 fathoms of nets that are fished with a permit pay of the cost of hiring a fisherman. Kalgin Island has about 15 family type fishing operations and I believe that only a couple of non-family crew fishermen fish on Kalgin Island each year because the family fish operations can't afford to hire a crew fisherman who can't fish additional nets to help pay for his wages. I believe there are over 200 family type fishing operations in Cook Inlet that could possibly hire about 100 young crewmen from our schools for a nice summer job if you were to pass this proposal to allow the heads of these family fishing operations to own, hold and fish a second setnet entry permit.

I can't think of anyone who will get hurt with the passing of this proposal, but I can think of a lot of young people who would get helped a lot. During these tough economic times when jobs are difficult to find everywhere and money is very scarce for both families and young people; I hope you will give them a break and pass this proposal.

Sincerely,



Larry M. Rozak

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Proposal #172 – Support – The Personal Use Salmon Fishery is a great program for the residents of Alaska, but there are some flaws in the program. One of the biggest is expecting individuals to be educated on the policies of the PU fishery. With such a high harvest potential, increased knowledge can only improve the fishery. Ignorance isn't bliss when it comes to the PU Fishery.

Proposal #174 – Opposed – The Personal Use Salmon Fishery is a great program for the *RESIDENTS* of Alaska. Allowing Non-Residents to use the PU fishery will significantly increase the harvest of Alaska's resource. Allowing tourist to come to Alaska and leave with over 100 fish will put a significant strain on the fish stocks.

Proposal #215 – Support – The majority of bead fishing done on the Kenai River is C&R. Anything that can be done to reduce the mortality rate of C&R and deformation of the fish should be instituted. A large number of Rainbow Trout and Dolly Varden have significant scaring from what appears to be from being hooked multiple times. If a small thing like pinching a barb could reduce the chances of this, it should be seriously considered

Proposal #245 – Support – Give the drift boat user group an additional day on the water. This will help reduce the hydrocarbon released in the Kenai River in July and will cut down on bank erosion. Allowing guides a drift day will open their clientele base to those who wish for the solitude that can be offered by the drift only days.

Proposal #246 – Support – Give the drift boat user group an additional day on the water. This will help reduce the hydrocarbon released in the Kenai River in July and will cut down on bank erosion. Allowing guides a drift day will open their clientele base to those who wish for the solitude that can be offered by the drift only days.

Proposal #266 – Support – Willow Creek is a very small river that is used by both power boats and non-motorized watercraft. I am afraid that there is the potential for a serious mishap on the river and a raft versus a jet sled could be bad for only one group.

Proposal #275 – Support – Little Susitna is a very small river that is used by both power boats and non-motorized watercraft. I am afraid that there is the potential for a serious mishap on the river and a raft versus a jet sled could be bad for only one group. Limiting the horsepower could help avoid such incidents.

Regards,
Christian Ornt
Anchorage, AK

From: Charles Pinckney
8823 July Creek Circle
Eagle River, AK 99577

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NOV 18 2010

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

BOARDS

Subject: Comments for the UPPER COOK INLET FINFISH Proposal Book 2011

Board Members,

Please accept the following timely comments for your upcoming meetings on February 20 – March 5, 2011 regarding UPPER COOK INLET FINFISH proposals.

PROPOSALS YES (IN FAVOR OF) 189, 209,224,225,226,227,235:

Proposal 189 – *Prohibit retention of king salmon in Cook Inlet dip-net fisheries.* With the current state of king salmon fisheries in the Kenai River, allowing harvest of Alaska's premier sport fish for personal use does not make sense. The dip-net fishery is a subsistence/meat fishery designed to allow Alaskans to fill their freezers with sockeye salmon. The king fishery has huge economic potential for the state as a sport fish and should not be exploited by the personal use fishery.

Proposal 209 – *Modify existing Kenai River guide hours from 6:00am – 6:00pm, to 7:00am – 7:00pm. (In favor)* Allowing unguided private anglers an additional hour in the a.m. to fish without guide boats would benefit the local fisherman and allow them more time in the a.m. during prime hours, thus allowing them to be off the water when the guide fleet hits the water at 7am, thereby reducing congestion.

Proposals 224, 225, 226 & 227 - *Killey River/3rd hole sanctuary area proposals. (In favor)* I am in favor of opening the Killey River sanctuary and 3rd hole to some form of king fishing. The last round of BOF changes (2007) prohibited all fishing in the Killey river sanctuary area from January 1st thru July 31st, essentially taking the only meaningful early run king fishery away from this section of river. With the present prohibitions in effect, the only king fishery that exists from Bings Landing to Skilak Lake is in the last two weeks of July on the late/2nd run kings. The local anglers in this section of river have been completely shut out of the early run king fishery with the Killey River sanctuary closure, forcing them to fish in the highly congested

lower river during the early run. I propose opening the Killey sanctuary from Jan 1 thru June 25th to allow a small window of opportunity on the early run Killey river spawners, and then a closure for the remainder of the season to July 31st. In summary, January 1 thru June 25th open, June 26-July 31 closed. This opening would allow a small exploitation of the early run Killey River spawners that make up almost 70% of the early run kings, but would protect the main stem spawners that hang around after June 25th.

Proposal 235 – *Extend slot limit through the end of July for Kenai River kings. (In favor)* The purpose of the slot limit is to protect the highly valuable large 4 ocean fish. It does not make sense to protect a fish that enters in June under this protection, to only be harvested after July 1 because the restriction is lifted. Extending the slot limit through the entire season will protect the large main stem spawners that spend up to 45 days in freshwater.

Catch & Release fishery: There is a simple way of reducing angler effort without reducing opportunity. Mandating the Kenai River king fishery to a pure catch and release fishery would have instant noticeable effects on the quality of the fishery, experience, and most importantly the future health of the runs. This is the easiest fix that the board has in front of them.

PROPOSALS OPPOSED/AGAINST (210,211,212,213,214,241,242,245,246):

Proposals 210, 211, 212, 213 & 214 – *Guide vessels increases (days, hours, months). (Opposed)* I am vehemently opposed to adding additional guide hours, days, or months to the current status of guide operations on the Kenai River regardless of species. **There are too many guides on the Kenai River.** Guides are better equipped and more experienced at harvesting fish from the river. Allowing an expansion of any time, days or months to the guide community will have huge allocation impacts to the unguided private anglers who have taken a back seat to the heavily commercialized, organized guided fishery. **I propose a reduction in guide days/guide numbers.** I believe the current system of no guided fishing on Sundays should extend through the entire fishing season, or more specifically extend through the silver/trout season from May 1 thru October 1. Guides represent a commercial use, and there is a long tradition of restricting commercial recreation uses before all uses in recreation settings. Many highly pressured rivers with substantial commercial use and overuse problems have limited guided use, often without limiting unguided use.

Proposal 241 & 242– *Close Kenai River to sport fishing on Tuesdays and Fridays, or on annual basis. (Opposed)* Closing the Kenai River to sport fishing on ANY day or yearly basis is a reduction in opportunity for all. I am opposed to any reduction of opportunity for sport fishermen. An easier fix, would be a catch and release fishery. Angler participation in a strictly

catch and release king fishery would be much less without reducing angler opportunity. It is possible that a compromise could be reached and an amended version of this proposal could read: *Close Kenai River to harvest of King salmon on Tuesdays and Fridays, allowing catch and release fishing only on two days of the week.*

Proposals 245 & 246 - *Add an additional drift boat only day. (Opposed)* Additional drift-only days will primarily displace unguided powerboat users. The overwhelming majority of the guide industry will utilize a drift boat. Currently there is insufficient infrastructure along the Kenai River to support the increased demands that additional drift-only days will bring. Even with more launches or parking, drift-only days that include guided use will have much higher use than existing drift only Mondays. The potential for crowding and congestion will increase, and the lesser mobility of the drift craft makes it difficult for users to avoid each other. Additionally, adding more drift only days will displace power boat use to the remaining days of the week which will increase congestion and crowding ten fold on the days that allow fishing from powered vessels. If additional drift-only days are implemented, then certain days of the week should allow for powerboat use WITHOUT drift craft to lessen the impact of increased demand on power days that is sure to happen if additional drift-only days are authorized.

Thank you for allowing me the opportunity to comment,

Charles Pinckney
Kenai River Landowner/Avid fisherman

Action:

Willow Area Community Organization
RESOLUTION SERIAL NO.09-13-2010-01

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ALASKA, Department of Fish and Game, and Board of Fisheries:

(1) RECOMMEND TO THE BOARD OF FISHERIES THAT SOCKEYE AND King SALMON STOCKS OF THE SUSITNA (YENTNA) RIVERS DRAINAGE, BE DESIGNATED "STOCKS OF CONCERN"; (2) Protect all Northern District salmon Stocks transiting the Central District and PREPARE MANAGEMENT PLANS FOR SALMON ESCAPEMENT AND PROTECTION; (3) ESTABLISH ESCAPEMENT GOALS FOR ALL SALMON SPECIES OF THE NORTHERN DISTRICT THAT CLEARLY INCLUDE INRIVER SPORT, SUBSISTENCE, AND PERSONAL USE NEEDS, AND (4) SUPPORT THE ENACTMENT OF THE SUSTAINABLE SALMON POLICY INTO STATE LAW.

WHEREAS, Personal use and Sports fishing are extremely important to the residents of Willow as a food source.

WHEREAS, spawning escapements for Susitna River sockeye have fallen below the minimum goal or goals at least two out of the last three years since the Board of Fisheries declared them a Stock of Yield Concern in 2008; and

WHEREAS, personal use in the Valley has occurred only twice in the last 10 years due to poor red salmon escapement, and sport fisheries have been subjected to continuous restrictions such as the prohibition of harvesting of sockeye, over the last 10 years; Coho limits have been reduced to a two fish daily bag limit along Parks Highway streams and King Salmon limits and seasons have been restricted or completely closed due to poor returns; and

WHEREAS, Northern Cook Inlet set net fisheries have had one

or more closed fishing periods in each of the past seven years;
and

WHEREAS, commercial drift net fishing periods have been increased and on several occasion near record harvest have been recorded since 2000; and

WHEREAS, Sustainable Salmon Fisheries Policy requires that when a chronic inability to maintain minimum spawning escapements of a stock, a stock of concern status should be declared, in 2008 the Board of Fisheries declared Susitna River red salmon as a stock of yield concern. Despite protective measures established by the Board of Fisheries on commercial fisheries in the Central District and Northern District, Susitna River has failed to make it's sockeye escapement two out of three years; and

Whereas, due to missed escapement goals the status of Susitna River red salmon should be increased from a yield concern to a more serious management concern,

WHEREAS, the state's Sustainable Salmon Policy falls short of it's potential by being regarded by the Staff of Fisheries Division as a set of recommendations, rather than clear regulatory directive, and as such making it too easy to set aside as management decisions are made; and

WHEREAS, genetic stock identification studies are in mid-

course and other Susitna Drainage fishery studies are also in progress, the number of issues cited herein indicate further actions are in order and a genetic test be developed to identify salmon at the source of catch, by native stream or river of origin to protect stocks moving through Central District of Cook Inlet; 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, **Willow Area Community Organization** requests the State of Alaska, Department of Fish and Game, recommend the Board of Fisheries declare sockeye and chinook salmon stocks of the Susitna (Yentna) Rivers as stocks of concern, and specifically management concern and yield concerns, as mandated by the Sustainable Salmon Policy (5AAC 39.222); and

BE IT FURTHER RESOLVED, that the **Willow Area Community Organization** requests the legislature, with the support of the Governor, fund the development and application of technology that will assure studies of multi-species escapement information for Susitna (Yentna) River salmon with emphasis on king, sockeye, chum, and coho in that priority. This includes providing on-going funding for enumerating king and coho salmon

at the Deshka Weir and additional weirs as needed to determine health of Northern District salmon stocks; and

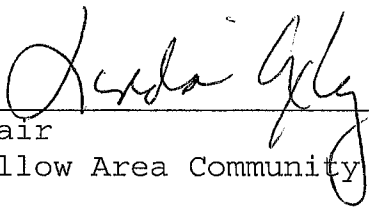
BE IT FURTHER RESOLVED, that the **Willow Area Community Organization** requests ADF&G prepare a phased enumeration plan, with cost estimates showing the funds needed to add each species beyond sockeye to the project. The development of an all-species enumeration project plan and cost figures by phase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

WHEREAS, there are no escapement targets for Chum and Coho salmon in the Northern District; and

BE IT FURTHER RESOLVED, that **Willow Area Community Organization** 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 7-10 years of capturing escapement counts (per above) to gain sufficient knowledge in support of establishing those goals. In the meantime, the establishment of a conservation corridor, and ensuring that the Precautionary Principle is followed by commercial fishery managers to insure that Northern District stocks are not targeted in the Central District ; and

BE IT FURTHER RESOLVED, that the **Willow**

BE IT FURTHER RESOLVED, that the Willow Area Community Organization requests the ADF&G and the Governor, take legislative action to enact into statute (and/or regulation as appropriate) a codified version of the Sustainable Salmon Policy.



Chair
Willow Area Community Organization

ATTEST:

Willow Area Community Organization
Linda Oxley, Chair
PO Box 1027 • Willow • AK 99688
chair@waco-ak.org



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



IN REPLY REFER TO:

FWS/OSM 11002/BOF UCI

JAN 26 2011

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JAN 26 2011
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Mr. Vince Webster, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Webster:

The Alaska Board of Fisheries will deliberate 2010/2011 regulatory proposals that address Upper Cook Inlet commercial, sport, personal use and subsistence finfish fisheries beginning February 20, 2011. We understand that the Board will be considering approximately 210 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and developed the enclosed preliminary comments on proposals which may have an effect on Federal subsistence users and fisheries in this area. We may wish to comment on other proposals if issues arise during the meeting which may have an effect on Federal subsistence users and fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Peter J. Probasco
Assistant Regional Director

Enclosure

cc: Cora Campbell, ADF&G
Tim Towarak, Chair FSB
Sue Aspelund CF, ADF&G, Juneau
Jim Simon, ADF&G, Fairbanks
Charles Swanton, ADF&G, Juneau
Jennifer Yuhas, ADF&G, Juneau
Jeff Regnart, ADF&G, Anchorage
James Hasbrouck ADF&G, Anchorage
George Pappas, ADF&G, Anchorage
Lisa Olson, ADF&G, Anchorage
Jim Marcotte, ADF&G, Juneau
Interagency Staff Committee

**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
for the
UPPER COOK INLET MANAGEMENT AREA**

**State of Alaska
Board of Fisheries Meeting
February 20-March 5, 2011
Anchorage, Alaska**

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Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

Early Russian River Sockeye Salmon Management Plan

Proposal 156 requests development of a management plan for the commercial harvest of early run Russian River sockeye salmon. It is requested the Plan provide for a GHL of 10,000 of these fish. If an incidental harvest of 200 early run Chinook salmon are harvested prior to achieving the GHL, this sockeye salmon fishery will be closed by ADF&G emergency order.

Existing State Regulation:

5 AAC 21.363. Upper Cook Inlet Salmon Management Plan

(a) The department should receive long-term direction in management of upper Cook Inlet salmon stocks and salmon species. Divisions within the department must receive

long-term direction in order to accomplish their missions and plan management, research, administrative, and other programs. Upper Cook Inlet stakeholders should be informed of the long-term management objectives of the Board of Fisheries (board). Therefore, the board establishes the following provisions for the management and conservation of upper Cook Inlet salmon stocks:

(1) consistent with the statutory priority for subsistence, the harvest of upper Cook Inlet salmon for customary and traditional subsistence uses will be provided for specific species in appropriate areas, seasons, and periods to satisfy subsistence needs; other beneficial uses, to the extent they are consistent with the public interest and overall benefit of the people of Alaska, will be allowed in order to maximize the benefits of these resources;

(2) to provide for the management and allocation of the upper Cook Inlet salmon resources, the harvest of the upper Cook Inlet salmon will be governed by specific and comprehensive management plans adopted by the board for salmon stocks and species, on a Cook Inlet basin wide basis, for different areas, and drainages and for different types of fisheries;

(3) in adopting the specific management plans described in (2) of this subsection the board will consider:

(A) the need for sustainable fisheries for all salmon stocks and salmon species throughout the Cook Inlet basin;

(B) the protection of the fisheries habitat both in the fresh water and the marine environment throughout the Cook Inlet basin; and

(C) the various needs and demands of the user groups of the salmon resources of upper Cook Inlet;

(4) in these management plans, the board may, as appropriate, address the following considerations:

(A) the need to allocate the harvestable surplus among commercial, sport, guided sport and personal use fisheries; and

(B) the need to allocate the harvestable surplus within user groups;

(5) in the absence of a specific management plan, it is the intent of the board that salmon be harvested in the fisheries that have historically harvested them, according to the methods, means, times, and locations of those fisheries;

(6) consistent with 5 AAC 39.220(b) , it is the intent of the board that, in the absence of a specific management plan, where there are known conservation problems, the burden of

conservation shall, to the extent practicable, be shared among all user groups in close proportion to their respective harvest on the stock of concern.

(b) Repealed 6/13/99.

(c) In this section "upper Cook Inlet salmon stocks" means those salmon that move through the Northern and Central Districts as defined in 5 AAC 21.200(a) and (b) and spawn in waters draining into those districts.

(d) Repealed 6/11/2005.

(e) Notwithstanding any other provision of this chapter, it is the intent of the board that, while in most circumstances the department will adhere to the management plans in this chapter, no provision within a specific management plan is intended to limit the commissioner's use of emergency order authority under AS 16.05.060 to achieve established escapement goals for the management plans as the primary management objective. For the purpose of this subsection, "escapement goals" includes inriver goal, biological escapement goal, sustainable escapement goal, and optimal escapement goal as defined in 5 AAC 39.222.

Other Relevant State Regulations:

5 AAC 21.361 Early Russian River Sockeye Salmon Management Plan Repealed

5 AAC 57.150 Russian River Sockeye Salmon Management Plan

(a) The purpose of this management plan is to ensure an adequate escapement, as determined by the department, of sockeye salmon into the Russian River system and to provide management guidelines to the department to reduce conflicts between various users of this resource. Because early and late Russian River system sockeye salmon are discrete stocks with established escapement goals, these stocks shall be managed by the department as a separate entity without regard to Kenai River system sockeye salmon run size, except as specified in this section.

(b) Early Russian River sockeye salmon stocks have been harvested primarily by the sport fishery since 1974. Since the bulk of the early Kenai River sockeye salmon run (those salmon passing the department sonar counter located near Soldotna before June 21) is comprised of Russian River sockeye salmon stocks, the department shall manage the early sockeye salmon stocks to achieve the escapement goals for the Kenai and Russian Rivers.

(c) Late Russian River sockeye salmon stocks are harvested in the Cook Inlet commercial salmon gillnet and the Kenai and Russian Rivers sport fisheries. The department shall manage the fisheries to achieve the escapement goal of sockeye salmon into the Russian River upstream of the department's counting weir at the outlet of Lower Russian Lake. If inseason restrictions are necessary to meet the escapement goal, the department shall restrict Kenai River drainage sport fisheries as described in (d) of this section. Since, at

present, it is not possible to separate the harvest of late Russian River sockeye salmon from other sockeye salmon stocks in Cook Inlet, restrictions on the commercial fishery to conserve Russian River sockeye salmon and meet the escapement goal shall be limited to meeting the inriver goals for the Kenai River late-run sockeye salmon, as specified in 5 AAC 21.360.

(d) If the department is not able to project that the escapement goal of late-run Russian River sockeye salmon will be achieved the commissioner shall, by emergency order, modify the Kenai River drainage sport and personal use fisheries to achieve the escapement goal by using the following options, selected at the discretion of the commissioner:

(1) a reduction of bag and possession limit to two or one sockeye salmon in all waters of the Kenai and Russian Rivers fly-fishing-only waters;

(2) a prohibition on sockeye salmon fishing in the Kenai and Russian Rivers fly-fishing-only waters upstream from the ferry crossing on the Kenai River;

(3) a prohibition on sockeye salmon fishing in all waters of the Kenai and Russian Rivers fly-fishing-only waters;

(4) a prohibition on sockeye salmon fishing from the confluence of the Kenai and Russian Rivers downstream to, and including, Skilak Lake.

(e) It is the intent of the Board of Fisheries (board) that the department use, to the extent practicable, the least restrictive of the individual or combined options under (d) of this section to achieve the late-run Russian River sockeye salmon escapement goal. The department shall, to the extent practicable, use the options under (d) of this section, to avoid the necessity for complete closures by initiating early, less restrictive options, as opposed to later, more restrictive actions.

(f) The department will, to the extent practicable, conduct habitat assessments on a schedule that conforms to the board's triennial meeting cycle. If assessments demonstrate a net loss of riparian habitat caused by noncommercial fishermen, the department is requested to report those findings to the board and submit proposals to the board for appropriate modification of this plan.

5 AAC 57.160. Kenai River and Kasilof River Early-run King Salmon Management Plan

(a) The purpose of this management plan is to ensure an adequate escapement of early-run king salmon into the Kenai and Kasilof Rivers, to conserve the unique large size early-run king salmon in the Kenai River, and to provide the department with management guidelines.

(b) The department shall manage the Kenai River early-run king salmon sport and guided sport fisheries to achieve the optimal escapement goal, to provide reasonable harvest opportunities over the entire run, and to ensure the age and size composition of the harvest closely approximates the age and size composition of the run.

(c) The department shall manage the Kasilof River early-run king salmon sport and guided sport fisheries to achieve the sustainable escapement goal, to provide reasonable harvest opportunities over the entire run while ensuring adequate escapement of naturally-produced king salmon, and to minimize the effects of conservation actions for the Kenai River on the Kasilof River.

(d) In the Kenai River,

(1) the seasons, bag, possession, and size limits, and other special provisions for king salmon are set out in 5 AAC 57.120 - 5 AAC 57.123 and in (4) of this subsection;

(2) if the spawning escapement is projected to be less than the lower end of the optimal escapement goal, the commissioner shall, by emergency order, restrict as necessary the taking of king salmon in the sport and guided sport fisheries in the Kenai River to achieve the optimal escapement goal using one of the following methods:

(A) prohibit the retention of king salmon less than 55 inches in length, except king salmon less than 20 inches in length, downstream from the outlet of Skilak Lake through June 30, and require that upstream from the Soldotna Bridge to the outlet of Skilak Lake and in the Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge, from July 1 through July 14, only one unbaited, single-hook, artificial lure may be used and only king salmon less than

(i) 46 inches in length and 55 inches or greater in length may be retained; or

(ii) 20 inches in length and 55 inches or greater in length may be retained; or

(B) close the sport and guided sport fisheries to the taking of king salmon in the Kenai River

(i) downstream from the outlet of Skilak Lake through June 30; and

(ii) from July 1 through July 14, upstream from the Soldotna Bridge to the outlet of Skilak Lake and in the Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge;

(3) if the spawning escapement is projected to fall within the optimal escapement goal, the commissioner shall, by emergency order, liberalize the sport fishery downstream from the outlet of Skilak Lake; by allowing the use of bait if the department projects that the total harvest under a liberalized sport fishery will not reduce the spawning

escapement below the optimal escapement goal; only king salmon less than 46 inches in length or 55 inches or greater in length may be retained;

(4) a person may not possess, transport, or export from this state, a king salmon 55 inches or greater in length taken from the Kenai River from January 1 through July 31, unless the fish has been sealed by an authorized representative of the department within three days after the taking; the person taking the fish must sign the sealing certificate at the time of sealing; the seal must remain on the fish until the preservation or taxidermy process has commenced; a person may not falsify any information required on the sealing certificate; in this paragraph,

(A) "sealing" means the placement of an official marker or locking tag (seal) by an authorized representative of the department on a fish and may include

(i) collecting and recording biological information concerning the conditions under which the fish was taken;

(ii) measuring the specimen submitted for sealing; and

(iii) retaining specific portions of the fish for biological information, including scales, fin rays, and vertebrae;

(B) "sealing certificate" means a form used by the department for recording information when sealing a fish.

(e) In the Kasilof River, the seasons, bag, possession, and size limits, and other special provisions for king salmon are set out in 5 AAC 56.120(a) and 5 AAC 56.122(8).

Existing Federal Regulation:

No regulation.

Other Relevant Federal Regulations:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(D) Residents of Hope, Cooper Landing, and Ninilchik may take only sockeye salmon through a dip net and a rod and reel fishery at one specified site on the Russian River, and sockeye, late-run Chinook, coho, and pink salmon through a dip net/rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided

in this section. For Ninilchik residents, salmon taken in the Kasilof River Federal subsistence fish wheel, and dip net/rod and reel fishery will be included as part of each household's annual limit for the Kenai and Russian Rivers' dip net and rod and reel fishery. For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for early-run Chinook salmon (unless otherwise provided for), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released. For the Russian River fishing site, incidentally caught fish may be retained for subsistence uses, except for early- and late-run Chinook salmon, coho salmon, rainbow trout, and Dolly Varden, which must be released. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Harvests must be reported within 72 hours to the Federal fisheries manager upon leaving the fishing site, and permits must be returned to the manager by the due date listed on the permit. Chum salmon that are retained are to be included within the annual limit for sockeye salmon. Only residents of Hope and Cooper Landing may retain incidentally caught resident species.

*(1) The household dip net and rod and reel gear fishery is limited to three sites:
(iii) At the Russian River Falls site, dip netting is allowed from a Federal regulatory marker near the upstream end of the fish ladder at Russian River Falls downstream to a Federal regulatory marker approximately 600 yards below Russian River Falls. Residents using rod and reel gear at this fishery site may not fish with bait at any time.*

(2) Fishing seasons are as follows:

(i) For sockeye salmon at all fishery sites: June 15–August 15;

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. Because of early run timing (most of the run is in the Kenai River by July 1), these sockeye salmon are currently not available to the upper Cook Inlet commercial salmon fisheries. The primary harvester of these fish is the inriver sport anglers who take most of their harvest in the Kenai/Russian River “fly-fishing-only” area. In addition to the sport harvest, the vast majority (approximately 80%) of sockeye salmon harvested in the Kenai River Federal subsistence fisheries are early run Russian River fish taken at the Russian River Falls dip net site. The 2007-2010 Federal subsistence sockeye salmon harvest at Russian River Falls has averaged approximately 837 fish per year. Reducing the number of fish to reach Russian River by 10,000 would lower the number of fish available for the sport fishery and the Federal subsistence fishery, which has a priority use. Allowing a GHF of 10,000 Russian River sockeye salmon in the commercial fishery would increase the potential for restrictions, and even closures, to the sport and Federal subsistence fisheries.

Federally qualified rural residents are also eligible to harvest early run Chinook salmon by rod and reel in all areas of the Kenai River that are open to sport fishing for this species. Early run Chinook salmon are presently fully allocated to the Kenai River inriver fisheries and the spawning escapement. Removal of only 200 of these fish by the

commercial fishery could prompt restrictions to the sport fishery as well as to the Federal subsistence fishery, which has a priority use.

Federal Position/Recommended Action: Oppose. The Federal Subsistence Management Program supports conservation of the resource. This proposal raises a potential conservation concern in that allowing the commercial fishery to harvest 10,000 early Russian River sockeye salmon could adversely impact this sockeye salmon population. This proposed action would also reduce fishing opportunities for Federally qualified subsistence users to harvest sockeye salmon at Russian River Falls. If this proposal is adopted, State and Federal managers would need to more closely monitor harvests of both Russian River sockeye salmon and early Kenai River Chinook salmon to ensure that spawning escapement goals are achieved, that the harvest opportunities in the Federal subsistence fishery are maintained, and that the combined harvest of all fisheries remain within sustainable limits.

Upper Cook Inlet Coho Salmon Sport Fisheries

Proposal 21 requests a decrease in the coho salmon bag (daily harvest) limit from 3 to 2 coho salmon in a portion of West Cook Inlet.

Existing State Regulation:

5 AAC 62.122. Special provisions and localized additions and exceptions to the seasons, bag, possession, and size limits, and methods and means for the West Cook Inlet Area

Unless otherwise specified by an emergency order issued under AS 16.05.060, the following are localized additions and exceptions to seasons, bag, possession, and size limits, and methods and means specified in 5 AAC 62.120 and 5 AAC 75 for the West Cook Inlet Area:

2) in drainages between the West Foreland and Cape Douglas, the bag limit for salmon, other than king salmon, is three fish per day and six in possession, of which three per day and six in possession may be coho salmon; after taking a bag limit of coho salmon 16 inches or greater in length, a person may not sport fish for any species of finfish during that same day;

Existing Federal Regulation:

Cook Inlet Area

§ ____ .27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. Seasons, harvest and possession limits, and method and means for take in the area affected by this proposal are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless specifically modified in Federal regulations. Therefore, if this proposal is adopted, the Federal daily harvest limit for coho salmon 16 inches and longer, for Federally qualified subsistence users would be the same as the State sport fishing regulations and be reduced from 3 to 2 coho salmon per day. In the waters within Lake Clark National Park draining into and including that portion of Tuxedni Bay within the Park, only residents of the Tuxedni Bay area would be affected as they are the only rural residents with a positive customary and traditional use determination for salmon in this area. In the remaining waters of Lake Clark National Park that flow into Cook Inlet (e.g. Silver Salmon and Shelter Creeks), all Federally qualified rural residents are eligible to harvest salmon under a Federal permit. As in Tuxedni Bay, the seasons, harvest and possession limits and method and means of take would be the same as the State sport fishing limit. The Federal inseason manager has the authority to issue a Special Action to temporarily change Federal regulations (effective for a maximum of 60 days) to maintain the current three coho salmon daily harvest limit for Federally qualified subsistence users fishing within Federal jurisdiction. A proposal would need to be submitted to the Federal Subsistence Board to request a permanent change in Federal subsistence regulations.

Federal Position/Recommended Action: Oppose. Federal Subsistence Management Program staff support conservation of the resource and would support this request if the Alaska Board of Fisheries and ADF&G determines that adopting this proposal is necessary for the conservation of coho salmon. However, unless a conservation concern exists, this proposal could unnecessarily reduce harvest opportunity for Federally qualified subsistence users to harvest coho salmon in this portion of Cook Inlet.

Proposals 23, 204, and 205 requests an increase in the coho salmon bag (daily harvest) and possession limit from 2 to 3 coho salmon in the Kenai Peninsula Area.

Existing State Regulations:

5 AAC 56.120 General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai Peninsula Area.

Unless otherwise specified in 5 AAC 56.122 or by an emergency order issued under AS 16.05.060, the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai Peninsula Area:

2) salmon, other than king salmon,

(A) 16 inches or greater in length may be taken from January 1 - December 31; bag and possession limit of three fish, of which only two may be coho salmon;

5 AAC 57.120. General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai River Drainage Area

Unless otherwise specified in 5 AAC 57.121 - 5 AAC 57.123 or by an emergency order issued under AS 16.05.060 , the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai River Drainage Area:

(4) salmon, other than king salmon,

(A) 16 inches or greater in length, as follows:

(i) sockeye, pink, and chum salmon may be taken from January 1 - December 31;

(ii) coho salmon may be taken in the Lower Section only from July 1 - November 30 and in the Middle and Upper Sections only from July 1 - October 31; a person after taking and retaining a bag limit of coho salmon 16 inches or greater in length from the Kenai River may continue to sport fish only from the Soldotna Bridge upstream to the ADF&G regulatory markers at the outlet of Skilak Lake;

(iii) except as provided in (iv) of this subparagraph, the bag and possession limit for sockeye, coho, and chum salmon in combination is three fish, of which no more than two may be coho salmon; in addition, the bag and possession limit for pink salmon is six fish;

(iv) from September 1 - October 31, in the flowing waters of the Kenai River, excluding the tributaries, the bag and possession limit for coho salmon is three fish per day;

5 AAC 57.170. Kenai River Coho Salmon Management Plan

(a) The purpose of this management plan is to ensure an adequate escapement of coho salmon into the Kenai River drainage and to provide management guidelines to the department. The department shall manage the Kenai River coho salmon stocks primarily to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon resources over the entire run.

(b) Notwithstanding any other provisions in this chapter, for the conservation of coho salmon stocks, the department shall manage sport fishing in the Kenai River drainage as follows:

(1) coho salmon fishing is closed in the Middle and Upper Sections from November 1 through June 30, and in the Lower Section from December 1 through June 30; any coho salmon caught incidentally must be released immediately without further harm;

(2) repealed 6/4/2008;

(3) coho salmon may be taken as follows:

(A) from July 1 through October 31, in the Middle and Upper Sections;

(B) from July 1 through November 30, in the Lower Section;

(C) from July 1 through August 31, the daily bag and possession limit for coho salmon 16 inches or greater in length is two fish;

(D) from September 1 through November 30, the daily bag and possession limit for coho salmon 16 inches or greater in length is three fish.

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(B) In addition to the dip net and rod and reel fishery on the upper mainstem of the Kasilof River described under paragraph (i)(10)(iv)(A) of this section, residents of Ninilchik may also take coho and pink salmon through a rod and reel fishery in Tustumena Lake. Before leaving the fishing site, all retained salmon must be recorded on the permit and marked by removing the dorsal fin. Seasons, areas, harvest and possession limits, and methods and means for take are the same as for the taking of these species under Alaska sport fishing regulations (5 AAC 56), except for the following methods and means, and harvest and possession limits:

(2) For coho salmon 16 inches and longer, the daily harvest and possession limits are 4 per day and 4 in possession.

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i) (10) (iv) (D) of this section), residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing their dorsal fin. Permits must be returned to the Federal fisheries manager at the end of the fishing season. Incidental caught fish, other than salmon, are subject to regulations found in paragraphs (i)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means for

take are the same as for the taking of these species under Alaska fishing regulations (5 AAC 56 and 5 AAC 57), except for the following bag and possession limits:

(5) For other salmon 16 inches and longer, the combined daily harvest and possession limits are 6 per day and 6 in possession, of which no more than 4 per day and 4 in possession may be coho salmon, except for the Sanctuary Area and Russian River, for which no more than 2 per day and 2 in possession may be coho salmon.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. Seasons, harvest and possession limits, and method and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless specifically modified in Federal regulations. Therefore, if this proposal is adopted, the Federal daily harvest limit for coho salmon 16 inches and longer, for Federally qualified subsistence users fishing in Federally managed waters of the Kenai Peninsula District, north of but excluding the Kenai River drainage, within the Kenai National Wildlife Refuge and the Chugach National Forest, would be the same as the State sport fishing regulations and be increased from 2 to 3 coho salmon per day.

However, the Federally managed waters of the Kasilof and Kenai River drainages within the Kenai National Wildlife Refuge and the Chugach National Forest have specific regulations, including harvest and possession limits. Therefore, if this proposal is adopted, Federal harvest and possession limits for non-Chinook salmon 16 inches and longer, for Federally qualified subsistence users (residents of Hope, Cooper Landing, and Ninilchik) fishing with rod and reel in Federally managed waters of the Kasilof (including Tustumena Lake) and Kenai River drainages would not change. Federally qualified subsistence users would still be allowed a daily harvest and possession limit of 4 coho salmon, 16 inches and longer, except for the Sanctuary Area at the confluence of the Kenai and Russian rivers and Russian River, for which no more than 2 per day and 2 in possession may be coho salmon. When the Federal Subsistence Board adopted these limits they were double the daily harvest and possession limit for coho salmon for sport anglers. A proposal would need to be submitted to the Federal Subsistence Board, if an increase in the subsistence harvest limit was sought.

Federal Position/Recommended Action: Neutral. Federal Subsistence Management Program staff support conservation of the resource, and has some concerns that increasing the coho salmon daily harvest and possession limit could adversely impact the coho salmon population. If this proposal is adopted, State and Federal managers would need to more closely monitor harvests to ensure they remain within sustainable limits.

Resident Species-Kenai and Kasilof Rivers

Proposal 215 requests to prohibit barbed hooks when using beads in the Kenai River.

Existing State Regulations:

5 AAC 57.120. General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai River Drainage Area.

Unless otherwise specified in 5 AAC 57.121 - 5 AAC 57.123 or by an emergency order issued under AS 16.05.060 , the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai River Drainage Area:

5 AAC 57.121. Special provisions and localized additions and exceptions to the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area

Unless otherwise specified by an emergency order issued under AS 16.05.060 , the following are the special provisions and localized exceptions to the general seasons, bag, possession, and size limits, and methods and means set out in 5 AAC 57.120 and 5 AAC 75 for the Lower Section of the Kenai River Drainage Area:

(1) sport fishing gear restrictions:

(A) from January 1 - June 30, in the Kenai River, only one unbaited single-hook, artificial lure may be used;

(B) from July 1 - July 31, in the Kenai River from its mouth upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake, only one single hook, may be used;

(C) from September 1 - December 31, in the Kenai River from the mouth of the Upper Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake, only unbaited, artificial lures may be used;

(D) from December 1 - December 31, in the Kenai River from its mouth upstream to the outlet of Skilak Lake, only unbaited artificial lures may be used;

(E) from May 15 - August 15, the Moose River from its confluence with the Kenai River upstream to the upstream edge of the Sterling Highway Bridge, and the waters of the Kenai River within a 100-yard radius of the Moose River, are fly-fishing-only waters;

(F) from January 1 - July 31, the following waters are fly-fishing-only waters:

(i) that portion of the Kenai River from an ADF&G regulatory marker located approximately 300 yards downstream from the mouth of Slikok Creek, upstream to an ADF&G regulatory marker located approximately 100 yards upstream from the mouth of Slikok Creek;

(ii) that portion of the Kenai River from an ADF&G regulatory marker located approximately one mile downstream from the mouth of Funny River, upstream to an ADF&G regulatory marker located approximately 200 yards upstream from the mouth of the Funny River;

(G) from January 1 - July 31, that portion of the Kenai River from an ADF&G regulatory marker located approximately three-quarters of a mile downstream from the mouth of the Lower Killey River, upstream to an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River, is fly-fishing-only waters;

(H) in Hidden Lake Creek, only one unbaited, single-hook, artificial lure may be used;

(I) in Arc Lake, Mackey Lakes, Derks Lake, Sevena Lake, Cisca Lake, Union Lake, and the unnamed lakes on Tote Road, five lines may be used to fish for northern pike through the ice; allowable gear is limited to standard ice fishing gear as specified in 5 AAC 57.120(9) (B); fishing gear must be closely attended as specified in 5 AAC 75.033; all other species of fish caught must be released immediately;

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i) (10) (iv) (D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (i) (10) (iv) (F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

(1) In the Kenai River below Skilak Lake, fishing is allowed with up to 2 baited single or treble hooks from June 15–August 31.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. There are specific Federal regulations for the portion of this fishery below Skilak Lake that allows for use of up to 2 baited single or treble hooks from June 16-August 31. However, outside of that area and those dates, seasons, harvest and possession limits, and method and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, Federally qualified subsistence users in the Kenai River would be limited to single, barbless hooks, except those fishing below Skilak Lake from June 15-August 31. Barbless hooks are used to minimize injury to fish in catch-and-release sport fisheries, and are also not as effective as barbed hooks in retaining fish for harvest. Requiring the use of barbless hooks by Federally qualified subsistence users would limit their ability to efficiently harvest fish, except as previously noted, coho salmon after August 21 and Dolly Varden prior to June 10 below Skilak Lake. The Federal inseason manager could issue a Special Action to temporarily change Federal regulations (effective for a maximum of 60 days) to adjust method and means for Federally qualified subsistence users. However, a proposal would need to be submitted to the Federal Subsistence Board to allow the use of barbed hooks for the entire season.

Federal Position/Recommended Action: Oppose. Federal Subsistence Management Program staff support conservation of the resource. However, unless a conservation concern exists, this proposal unnecessarily reduces the efficiency and harvest opportunity of Federally qualified subsistence users fishing in this area.

Proposal 216 requests to liberalize the length at which rainbow trout may be retained in the lower Kenai River from less than 18 inches to less than 24 inches. Further, it requests that one rainbow trout over 24 inches may be retained annually.

Existing State Regulation:

5 AAC 57.120. General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai River Drainage Area.

Unless otherwise specified in 5 AAC 57.121 - 5 AAC 57.123 or by an emergency order issued under AS 16.05.060 , the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai River Drainage Area:

(6) rainbow/steelhead trout

(A) are subject to an annual limit of two fish 20 inches or greater in length, and a harvest record is required as specified in 5 AAC 57.124;

(B) may be taken from June 11 - May 1, in all flowing waters from the mouth of the Kenai River upstream to Skilak Lake, and the waters of Skilak Lake, except the water within a one-half mile radius of the Kenai River inlet; bag and possession limit of one fish less than 18 inches in length; rainbow/steelhead trout 18 inches or greater in length may not

be retained; rainbow/steelhead trout caught that are 18 inches or greater in length must be released immediately;

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(F) For Federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, residents of Hope and Cooper Landing may take resident fish species including lake trout, rainbow trout, and Dolly Varden/Arctic char with jigging gear through the ice or rod and reel gear in open waters. Resident fish species harvested in the Kenai River drainage under the conditions of a Federal subsistence permit must be marked by removal of the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these resident species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.54), except for the following harvest and possession limits:

(3) In flowing waters, daily harvest and possession limits for rainbow/ steelhead trout are 1 per day and 1 in possession and must be less than 18 inches in length. In lakes and ponds, daily harvest and possession limits are 2 per day and 2 in possession of which only 1 fish 20 inches or longer may be harvested daily.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: No. Specific Federal regulations apply to Federally managed waters of the Kenai River and its tributaries. Therefore, if this proposal is adopted, the Federal daily harvest and possession limits in flowing waters for rainbow/steelhead trout would remain 1 per day and 1 in possession less than 18 inches in length. As a result, State sport fishing regulations for rainbow/steelhead trout would be more liberal than Federal subsistence regulation, and would also create a divergence between Federal and State regulations that would increase regulatory complexity. A proposal would need to be submitted to the Federal Subsistence Board to increase the allowable size limit for harvested rainbow trout.

However, it is our understanding that the current regulations prohibiting the retention of rainbow trout 18 inches or longer were adopted to conserve spawning sized rainbow trout once they are large enough to spawn. Relaxing harvest size restrictions could adversely

impact rainbow trout populations and affect opportunities for all user groups, including Federally qualified users.

Federal Position/Recommended Action: Oppose. Federal Subsistence Management Program staff support conservation of the resource. The Federal Subsistence Board adopted the current regulations allowing the daily harvest of one rainbow/steelhead trout less than 18 inches in the lower Kenai River and less than 16 inches in the upper Kenai River to protect spawning size class rainbow trout, which was advised by Federal staff based on information provided by the State. Current size restrictions apply to both Federal subsistence and State sport fishing users and are intended to limit the harvest of rainbow/steelhead in the spawning population.

Proposal 218 requests a rainbow/steelhead trout spawning closure from May 2 – June 10 for all tributaries of Tustumena Lake.

Existing State Regulation:

5 AAC 56.120. General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai Peninsula Area *(a) Unless otherwise specified in 5 AAC 56.122 or by an emergency order issued under AS 16.05.060, the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai Peninsula Area:*

(4) rainbow/steelhead trout, as follows:

(A) may be taken in flowing waters from January 1 - December 31; bag and possession limit of two fish, of which only one may be 20 inches or greater in length;

(B) may be taken in lakes and ponds from January 1 - December 31; bag and possession limit of five fish, of which only one may be 20 inches or greater in length;

(C) there is an annual limit of two fish 20 inches or greater in length, and a harvest record is required as specified in 5 AAC 56.124;

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) *You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:*

(C) Resident fish species including lake trout, rainbow/steelhead trout, and Dolly Varden/Arctic char may be harvested in Federally managed waters of the Kasilof River drainage. Resident fish species harvested in the Kasilof River drainage under the

conditions of a Federal subsistence permit must be marked by removing the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site.

(3) Rainbow trout may be harvested with rod and reel gear the entire year for fish less than 20 inches in length. In flowing waters, daily harvest and possession limits are 2 per day and 2 in possession. In lakes and ponds, daily harvest and possession limits are 5 per day and 5 in possession.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. Seasons, harvest and possession limits, and method and means for take are the same as for the taking of these fish under Alaska sport fishing regulations (5 AAC 56) unless specifically modified in Federal regulations. Therefore, if this proposal is adopted, the open season for Federally qualified subsistence users fishing in tributaries of Tustumena Lake would be the same as State sport fishing regulations and be open from June 11 through May 1. This action would decrease fishing opportunities for Federally qualified subsistence users to harvest rainbow/steelhead trout. The effect of adopting this proposal on Federal subsistence users would be expected to be minimal since to date there has been no reported harvest of any rainbow/steelhead trout in the Federal subsistence fisheries in the Kasilof River drainage.

Federal Position/Recommended Action: Support. Federal Subsistence Management Program staff support conservation of the resource and support this request for the conservation of rainbow/steelhead trout that spawn in Tustumena Lake tributaries. Recent weir counts (2004-2009) and radio telemetry studies (2007-2009) conducted by the U.S. Fish and Wildlife Service show that steelhead trout spawn primarily in tributaries of the Kasilof River and Tustumena Lake. Crooked and Nikolai creeks support the largest number of spawning steelhead; mean annual counts of spawners in these streams from 2006-2009 were 708 and 560 steelhead, respectively. Telemetry studies also have identified four previously unknown spawning areas within the Kasilof River drainage: two tributaries to Tustumena Lake (Indian and Shantatalik creeks), Coal Creek, and the mainstem Kasilof River.

Therefore, if this proposal is adopted it would provide protection for spawning rainbow/steelhead trout in the tributaries of Tustumena Lake by including regulations for rainbow/steelhead trout in these tributaries with most flowing water of the Kenai Peninsula that are closed to fishing for rainbow/steelhead trout from May 2 - June 10.

Kenai River Sport Fisheries

Proposal 232 requests the use of bait from May 1 or June 1 in the Kenai River early-run king (Chinook) salmon fishery.

Existing State Regulation:

5 AAC 57.121. Special provisions and localized additions and exceptions to the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area

Unless otherwise specified by an emergency order issued under AS 16.05.060, the following are the special provisions and localized exceptions to the general seasons, bag, possession, and size limits, and methods and means set out in 5 AAC 57.120 and 5 AAC 75 for the Lower Section of the Kenai River Drainage Area:

(1) sport fishing gear restrictions:

(A) from January 1 - June 30, in the Kenai River, only one unbaited single-hook, artificial lure may be used;

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (i)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

(2) For early-run Chinook salmon less than 46 inches or 55 inches or longer, daily harvest and possession limits are 2 per day and 2 in possession.

(3) For late-run Chinook salmon 20 inches and longer, daily harvest and possession limits are 2 per day and 2 in possession.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. There are specific Federal regulations for this fishery that allow 2 baited single or treble hooks to be used downstream from Skilak Lake from June 15-August 31. Outside of those dates, seasons, harvest and possession limits, and method and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, Federally qualified subsistence users would probably be able to more effectively harvest early run Chinook salmon. However, to date there has been no reported harvest of Chinook salmon in Federal subsistence fisheries in the Kenai River drainage. Therefore, adoption would not be expected to impact Federally qualified subsistence users, although it could increase the incidental harvest of rainbow trout in both the State sport and Federal subsistence fisheries.

Federal Position/Recommended Action: Oppose. The Federal Subsistence Board adopted the June 15 starting date for the use of bait due to conservation concerns for rainbow trout, which was advised by Federal staff based largely on information provided by the State. Since early Chinook salmon abundance in the Kenai River is much less than that of late-run Chinook salmon, a more conservative approach to management is required. The early-run Chinook salmon fishery is better managed using a bait restriction until adequate numbers enter the river, at which time the bait restrictions can be lifted by in-season action.

Proposals 233 and 234 requests to repeal slot limit for Kenai River early-run king (Chinook) salmon (entirely or in May and June only).

Existing State Regulation:

5 AAC 57.120 General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai River Drainage Area.

Unless otherwise specified in 5 AAC 57.121- 5 AAC 57.123 or by an emergency order issued under AS 16.05.060 , the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai River Drainage Area:

(2) king salmon 20 inches or greater in length, as follows:

(A) may be taken only from January 1 - July 31, in the Kenai River from its mouth upstream to the outlet of Skilak Lake and in the Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge, with a bag and possession limit of one fish, as follows:

(i) from January 1 - June 30, from its mouth upstream to the outlet of Skilak Lake, and from July 1 - July 14, from the Soldotna Bridge upstream to the outlet of Skilak Lake and in Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge, only king salmon that are less than 46 inches in length or 55 inches or greater in length may be retained;

Existing Federal Regulation:

Cook Inlet Area

§ __.27(i)(10)(iv) You may only take salmon, Dolly Varden, trout, and char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kenai River drainage:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing their dorsal fin. Permits must be returned to the Federal fisheries manager at the end of the fishing season. Incidental caught fish, other than salmon, are subject to regulations found in paragraphs (i)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means for take are the same as for the taking of these species under Alaska fishing regulations (5 AAC 56 and 5 AAC 57), except for the following bag and possession limits:

(2) For early-run Chinook salmon less than 46 inches or 55 inches or longer, daily harvest and possession limits are 2 per day and 2 in possession.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. If either of these proposals are adopted, the slot size limit for Chinook salmon harvested in the Kenai River from January 1-July 14 would either be eliminated from State sport fishing regulations entirely or removed from these regulations in May and June. However, slot limits would remain in effect for Federal subsistence rod and reel fisheries. This would create a divergence between Federal and State regulations that would increase regulatory complexity and enforcement concerns, and would also make State sport fishing regulations more liberal than Federal Subsistence regulations. A proposal would need to be submitted to the

Federal Subsistence Board to eliminate or modify, the slot harvest limits currently in Federal subsistence fishing regulations.

Slot limit harvest restrictions were adopted by the Alaska Board of Fisheries in February of 2002, revised in 2003 and 2008, and later adopted by the Federal Subsistence Board. These regulations are meant to protect larger, older Chinook salmon returning to the Kenai River during the early run, and were adopted in response to the observed decline in the number of larger Chinook salmon in this run. Elimination of the slot limit could increase effort from anglers that normally target late run fish and result in an increased harvest of larger and older early-run Chinook salmon. Therefore, adoption of this proposal would likely result in a lower quality of escapement, with fewer of these larger Chinook salmon reaching the spawning grounds to reproduce and pass on their desirable genetic traits. Elimination of the slot limit could also result in the need to raise the overall spawning escapement goal and increase the possibility of fishery closures.

Federal Position/Recommended Action: Oppose. Federal Subsistence Management Program staff support conservation of the resource. The Federal Subsistence Board adopted the current slot harvest limit regulations for resource conservation as advised by Federal staff and based largely on information provided by the State.

Proposal 235 requests to extend the slot limit for Kenai River king (Chinook) salmon through the end of July.

Existing State Regulation:

5 AAC 57.120 General provisions for seasons, bag, possession, and size limits, and methods and means for the Kenai River Drainage Area.

Unless otherwise specified in 5 AAC 57.121- 5 AAC 57.123 or by an emergency order issued under AS 16.05.060 , the following are the general seasons, bag, possession, and size limits, and methods and means that apply to sport fishing for finfish in the Kenai River Drainage Area:

(2) king salmon 20 inches or greater in length, as follows:

(A) may be taken only from January 1 - July 31, in the Kenai River from its mouth upstream to the outlet of Skilak Lake and in the Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge, with a bag and possession limit of one fish, as follows:

(i) from January 1 - June 30, from its mouth upstream to the outlet of Skilak Lake, and from July 1 - July 14, from the Soldotna Bridge upstream to the outlet of Skilak Lake and in Moose River from its confluence with the Kenai River upstream to the northernmost edge of the Sterling Highway Bridge, only king salmon that are less than 46 inches in length or 55 inches or greater in length may be retained;

Existing Federal Regulation:

Cook Inlet Area

§ ____ .27 (i) (10) (iv) You may only take salmon, Dolly Varden, trout, and char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kenai River drainage:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing their dorsal fin. Permits must be returned to the Federal fisheries manager at the end of the fishing season. Incidental caught fish, other than salmon, are subject to regulations found in paragraphs (i)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means for take are the same as for the taking of these species under Alaska fishing regulations (5 AAC 56 and 5 AAC 57), except for the following bag and possession limits:

(2) For early-run Chinook salmon less than 46 inches or 55 inches or longer, daily harvest and possession limits are 2 per day and 2 in possession.

(3) For late-run Chinook salmon 20 inches or longer, daily harvest and possession limits are 2 per day and 2 in possession.

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: No. There are specific Federal regulations for the Chinook salmon fishery in the Kenai River, including a 46 inch to 55 inch slot harvest limit for Chinook salmon harvested from January 1 – July 14. However, Federal regulations for Chinook salmon harvested from July 15 – July 31 do not include a slot limit.

This proposed action would extend the sport fishing slot harvest limit for Chinook salmon in the Kenai River through July 31. This would make State sport fishing regulations more restrictive than Federal subsistence fishing regulations that do not have a slot limit after July 14. This action could potentially increase fishing opportunities for Federally qualified subsistence users to harvest Chinook salmon. However, to date there has been no reported harvest of Chinook salmon in Federal subsistence fisheries within

the Kenai River drainage. If this proposal is adopted, a proposal could be submitted to the Federal Subsistence Board for establishment of a slot harvest limit for Chinook salmon through the end of July.

Federal Position/Recommended Action: Neutral. Federal Subsistence Management Program staff supports conservation of the resource, and look to the Alaska Board of Fisheries and ADF&G to determine the need to extend slot limit regulations for the sport fishery through the end of July to sustain the Chinook salmon run.

Kenai River Vessel Restrictions

Proposals 245 and 246 request an additional drift boat only day on the Kenai River.

Existing State Regulation:

5 AAC 57.121. Special provisions and localized additions and exceptions to the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area

Unless otherwise specified by an emergency order issued under AS 16.05.060 , the following are the special provisions and localized exceptions to the general seasons, bag, possession, and size limits, and methods and means set out in 5 AAC 57.120 and 5 AAC 75 for the Lower Section of the Kenai River Drainage Area:

(3) a person may not sport fish from a boat

(A) on any Monday in May, June, and July, except Memorial Day, in that portion of the Kenai River from its mouth upstream to the outlet of Skilak Lake, except that unguided sport fishing from a non-motorized vessel is allowed on Mondays in May, June, and July as described in 5 AAC 21.359(b) (2); for the purposes of this subparagraph, "non-motorized vessel" is a vessel that does not have a motor on board;

Other Relevant State Regulations:

5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan

(b) The department shall manage the late run of Kenai River king salmon to achieve a biological escapement goal of 17,800 - 35,700 king salmon, as follows:

(2) in the sport fishery, that portion of the Kenai River downstream from Skilak Lake is open to unguided sport fishing from a non-motorized vessel on Mondays in July; for purposes of this section a non-motorized vessel is one that does not have a motor on board;

Existing Federal Regulation:

Cook Inlet Area

§ .27 (i) (10) (iv) You may only take salmon, Dolly Varden, trout, and char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kenai River drainage:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (i)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing their dorsal fin. Permits must be returned to the Federal fisheries manager at the end of the fishing season. Incidental caught fish, other than salmon, are subject to regulations found in paragraphs (i)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means for take are the same as for the taking of these species under Alaska fishing regulations (5 AAC 56 and 5 AAC 57), except for the following bag and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board (FSB)? No.

Impact to Federal subsistence users/fisheries: Yes. Seasons, harvest and possession limits, and method and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, the Kenai River would be closed to Federally qualified subsistence users and State sport anglers an additional day each week unless they fish from a drift boat or shore. This would reduce fishing opportunities for Federally qualified subsistence users since not all of them own or have access to a drift boat. The Federal inseason manager could issue a Special Action to temporarily change Federal regulations (effective for a maximum of 60 days) to adjust method and means for Federally qualified subsistence users. A proposal could be submitted to the Federal Subsistence Board to provide additional fishing opportunity to Federally qualified subsistence users.

Federal Position/Recommended Action: Oppose. Federal Subsistence Management Program staff support conservation of the resource. However, this proposal appears to address a social issue (crowding) rather than a biological issue. Unless a conservation concern exists, this proposal would unnecessarily reduce harvest opportunities for

Federally qualified subsistence users who do not have access to drift boats to fish within Federal public waters of the Kenai River.
