

## ***Kenai Peninsula Fishermen's Association***

*Ensuring the Sustainability of Our Fishery Resources*

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To: Board of Fisheries / Board Support Section

**RE: Kenai River late-run sockeye salmon goal and management plan**

**KPFA Proposal 160 Support by New Information to the Board**

**Proposal 161 Reject**

ADFG report found in RC 4 (Review of Salmon Escapement Goals in Upper Cook Inlet, Alaska, 2014) clearly demonstrates yield relative to Kenai River late-run sockeye salmon historically. Ref: Table 8, page 27. "The Markov yield analysis indicated highest (>3.9 million) mean yields occur within the range of 600,000 -900,000 spawners." Ref: (Page 11). The risk analysis also supports this goal range. Also, by placing spawning escapements that exceed 1.15 million increases the risk on yield, especially by back to back over escapements. The results of lower fry weights, fry overwintering mortality, and food limitation effects from driving down the copepod biomass the following spring required for winter survival. **2003 – 2006 parent years with repeated escapements at over 1.4 – 1.7 million diminished Yields and Return per Spawners down to 2 recruits per spawner instead of producing 4 recruits. The yield lost from less recruitment was million sockeye (less) which represents 36 million pounds of sockeye salmon lost and not harvested (minus 90 million dollars in ex-vessel value alone or a loss of 180 million to the fishing industry sector. This has already been realized – it is not theoretical. (Ref: page 73).**

**Proposal 160 addresses yield and management to distribute late-run sockeye salmon within the established goal range. This proposal promotes one inriver goal of 800,000 – 1.2 million sockeye. This range and inriver goal contains the sport harvest allocation past river mile 19 and allows the department to manage to the mid-point of the SEG. The SEG mid-point is 950,000 sockeye salmon and the sport harvest allocation of 250,000 at the upper end of the range and 200,000 at the lower range (Markov yield range). This range would allow the department to manage and distribute escapements evenly in the SEG and inriver range to within 400,000 sockeye salmon instead of trying to manage to within 200,000 fish under the current tiers - that is impossible to obtain nor is this practicable to manage in order to sustain spawning escapements within the SEG range of 700,000 – 1, 200,000 fish.**

**Reject Proposal 161 entirely.**

**This proposal will result in increased risk and yield loss.** This proposal further seeks to expand allocation at the lower end of range that is unwarranted since the 2008 BOF harvest allocation was 150,000 on runs under 2.3 million that would be doubled in this proposal. At the upper range this proposal seeks an additional 300,000 sockeye salmon allocation on top of the BOF sport allocation of 250,000 passed by the Board in 2011 and is already contained in the inriver goal – but now seeks a 550,000 sockeye past river mile 19 when the mean sport harvest rates are at or near 250,000 on runs of 2.3 – 4.6 million returns. **This proposal falsely claims “300,000 are not included in the current inriver range” and seeks an additional 300,000 when the current inriver upper goal range has 250,000 sockeye already allocated and included. This false misrepresentation is an attempt to confuse the public and board over 50,000 sockeye and misrepresent the sport harvest allocation which reconfigures 50,000 sockeye into 550,000 sockeye salmon!!**

This does not include the 80,000 sockeye or greater harvest below sonar or the significant numbers in the personal use fishery. Furthermore, this proposal seeks a sport harvest allocation of 400,000 at the lower range which has never occurred in this fishery. **This proposal seeks an upper range of 1,500,000 that would significantly depart from optimal yields. Again this upper inriver range would consistently result in spawning escapements over 1.1 million and replicate lost yield that occurred in the past. The yield risk would essentially predetermine 2 recruits instead of producing 4 recruits per spawner. The economic loss and impact would result in tens of millions foregone annually from lost yield (lost harvest) and essentially destroy the commercial fishing sector and industry, destabilize the inriver sport and personal use fisheries, and quickly destroy the economy and livelihoods on the Kenai Peninsula.**



**Appendix A3 ESSN Kenai River late-run king salmon harvest 2013**

Date	244-21		244-22		244-25		244-31		244-32		244-41		244-42		Total	
	Ninilchik		Cohoe		Kasilof Terminal		South K-Beach		North K-Beach		Salamatof		E. Forelands		Total	
	Daily	Cum	Daily	Cum	Daily	Cum	Daily	Cum	Daily	Cum	Daily	Cum	Daily	Cum	Daily	Cum
27-Jun	11	11	26	26			6	6							42	42
30-Jun	11	22	26	52			15	21							52	94
1-Jul	24	46	28	80			23	44							75	169
4-Jul	21	67	26	105			10	54							57	226
6-Jul	21	88	30	136			13	67							64	290
8-Jul	23	111	48	184			16	83	83	83	137	137	8	8	316	606
10-Jul	18	129	58	242			8	91							84	689
11-Jul	26	154	43	285			25	116	105	187	202	339	10	19	410	1,100
15-Jul	28	182	62	346			26	142	32	219	99	438	8	27	255	1,355
17-Jul					6	6									6	1,361
18-Jul	19	201	59	406	2	8	34	177	69	288	121	559	13	40	318	1,679
20-Jul	18	220	25	430			20	197	40	328	141	700	7	47	250	1,930
21-Jul					4	12									4	1,934
22-Jul					8	21									8	1,943
23-Jul	21	240	37	467	2	23	25	222	56	383	137	838	8	55	285	2,228
24-Jul					9	32									9	2,236
25-Jul					4	35									4	2,240
26-Jul					14	49									14	2,254
27-Jul					4	53									4	2,258
28-Jul					6	59									6	2,264
29-Jul					4	64									4	2,268
30-Jul					13	77									13	2,281
1-Aug					3	79									3	2,284
2-Aug					5	84									5	2,289