

On-Time Public Comment List

Upper Cook Inlet | February 23–March 8, 2017

Alaska Outdoor Council	PC01
Alaska Salmon Alliance	PC02
Alex Gimarc	PC03
Alex Pfoff.....	PC04
Andrew Couch.....	PC05
Ben Allen	PC06
Birch Yuknis.....	PC07
Brian & Lisa Gabriel.....	PC08
Brian West.....	PC09
Catherine Cassidy.....	PC10
Charles DuCharme	PC11
City of Kenai	PC12
Constance Markis.....	PC13
Dale Miller.....	PC14
Dan Norman.....	PC15
Darren Platt.....	PC16
David Hillstrand.....	PC17
Don Johnson.....	PC18
Erik Barnes	PC19
Gary Hollier	PC20
Gary Snyder.....	PC21
Gary Steele.....	PC22
George Contantino.....	PC23
Greg Giauque	PC24
Hans Nordstrom.....	PC25
James Grotha	PC26
Jayden	PC27
Jim Colver.....	PC28

On-Time Public Comment List

Upper Cook Inlet | February 23–March 8, 2017

Joan Clover	PC29
Joan Diamond	PC30
John Kaiser	PC31
John Sonin	PC32
Joseph Person	PC33
Karl Johnstone.....	PC34
Ken Hinckle.....	PC35
Kenai Area Fishermen's Coalition	PC36
Kenai Peninsula Fishermen's Association	PC37
Kenai River Professional Guide Association.....	PC38
Kenai River Sportfishing Association	PC39
Les Palmer	PC40
Mark Glassmaker	PC41
Mat-Su Borough Fish and Wildlife Commission	PC42
Mat-Su Salmon Partnership	PC43
Office of Subsistence Management.....	PC44
Pat Zurfluh.....	PC45
Pautzke Bait Company	PC46
Penny Johnson	PC47
Petersburg Borough	PC48
Preston Williams	PC49
Ralph Renzi.....	PC50
Representative Les Gara	PC51
Rich Bagley et al	PC52
Richard Person	PC53
Robert Bechtold	PC54
Ron Maddox.....	PC55
South Central Alaska Dipnetters Association	PC56
Susan Payne	PC57

On-Time Public Comment List

Upper Cook Inlet | February 23–March 8, 2017

Todd Moore	PC58
Trevor Rollman.....	PC59
United Cook Inlet Drift Association	PC60
Victor Hett.....	PC61
Winton Voetmann	PC62



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2/9/2017 5:07:11 AM
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Chairman Jensen and Members of the Alaska Board of Fisheries,

I am Rod Arno, writing to you as Executive Director of the Alaska Outdoor Council (AOC). Conservation of publicly owned fish and game resources are AOC's first purpose. After sustained yield of fish stocks and game populations are assured AOC works to maintain access to Alaska hunting and fishing opportunities for all Alaskans, and also seeks to provide reasonable fish and game harvest opportunities for all Alaskans.

As other individuals or groups may have already told you, over the recent 10 year period from 2006 -- 2015, Commercial Permit holders have harvested roughly 3/4 of all Upper Cook Inlet salmon leaving about 1/4 of the harvest for the combined personal use, sport, and subsistence user groups. Your task during the 2017 Upper Cook Inlet Fisheries is not necessarily to decide who gets to harvest the largest share of the salmon resource, but rather how to sustain the resource first -- and next how to allocate the resource and the burden of conservation in such a manner as to maximize human benefit derived from the resource.

These are long standing issues before each new Board, and past boards' have planned and written extensively on the subject. Therefore I would like to refer Board Members to a 1977 Board Finding which identified the value of managing king salmon and coho salmon primarily for recreational (now sport and guided sport) use. From finding 77-27-FB I present the following long-term planning conclusions:

3. Of the salmon stocks in Cook Inlet, the king and silver salmon are the target species for the recreational angler, while the chum, pink, and red salmon are the predominant commercial fishery.

it is not the Board's intent to establish exclusive uses of salmon stocks; rather its purpose is to define the primary beneficial use of the stock while permitting secondary uses of the stock to the extent it is consistent with the requirements of the primary user group.

From final point 2. Stocks which normally move in Cook Inlet after June 30 shall be managed primarily as a non recreational resource until after August 15, however existing recreational target fish shall only be harvested incidental to the non-recreational use;

Moving forward 40 years, It is easy to identify efforts at following directives from Finding 77-27-FB, and in particular, as it relates to Kenai Peninsula sport fisheries. Moving North in Upper Cook Inlet, however, attempts at following the recreational directive to harvest king and silver salmon only incidentally in commercial fisheries targeting sockeye, pink, and chum salmon seems to have mixed results at best. It is with this thought in mind that AOC would like to provide more information concerning a suite of proposals it submitted and continues to support. Concerning Proposals 93, 212, 203:

Proposal 93 seeks to align management actions within the Central District Drift Fishery Management Plan more closely with the plan's purpose: "to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District and Kenai River coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run as measured by the number of inseason restrictions."

Current provisions within the plan allow both regular weekly periods to be fished area-wide during the first two weeks of August. This is the time of the season when sockeye salmon abundance is declining and the proportion of silver salmon harvest is climbing. Northern coho sport fisheries at Jim Creek and Little Susitna River also have a history, over the past 8 years, of sport fishery restrictions, closures, and missed escapement goals. It should also be noted that area-wide drift gillnetting only increases the chance of over harvesting Stock of Concern Susitna River sockeye salmon as well. Therefore it makes more sense, better follows the longtime directives for Upper Cook Inlet salmon fisheries, and more closely follows the management plan purpose to harvest any August abundance of Kenai or Kasilof River sockeye salmon in a more stock selective manner. During regular 12-hour periods harvestable surplus sockeye salmon may be harvested within the Expanded Kenai and Kasilof Sections and in Area 1 south of Kalkan Island, thereby increasing the chance of attaining Northern salmon escapement goals, and allowing Northern user groups a more reasonable opportunity to harvest Upper Cook Inlet salmon. All additional time drift fishing (focused on harvesting Kenai sockeye salmon) should occur in the Expanded Kenai, Kasilof, and Anchor point sections.

In response to Alaskans consistently expressing concerns that too many sockeye salmon could be allowed to escape up the Kenai River, AOC has submitted and supports Proposal 203 which would allow the Commissioner to extend the Kenai River personal use dip net



fishery through August 10, and increase the personal use bag limit when the Kenai River sockeye salmon escapement can be projected to exceed 1.2 million fish. This would allow an even more selective harvest of Kenai River bound salmon, and have the added benefit of spreading additional harvest opportunity to a much larger group of Alaskan residents. Whenever there is an emergency level abundance of sockeye salmon, every Alaskan should have a reasonable opportunity to participate in the expanded harvest opportunity. Note: According to a department staff member a projected escapement exceeding 1.2 million Kenai River is something that has occurred every year for the past 10 years, so this is a tool that definitely should be added to the department list of selective harvest options.

Proposal 212 would close the Northern District commercial set net fishery after the regular August 15 period. This would better align the Northern District commercial fishery with a purpose of the management plan (to minimize the harvest of coho salmon bound for the Northern District of Upper Cook Inlet) and also provide better alignment with the long term directive from Board Finding 77-27-BF: that recreational (sport and guided sport) target fish shall only be harvested incidental to the non recreational use. The abundance of non recreational (commercial) target species is in free fall decline after August 15. According to department data in the past decade the Northern District set net fishery has harvested 5 times as many coho salmon after August 15 than the total harvest of all other salmon species combined for the same time period. Such high harvest proportion of coho salmon would seem to be focusing harvest on coho rather than catching them in an incidental manner. Therefore, closing the Northern District fishery on August 15th, after the regular period, would bring the fishery more inline with the management purpose, and long- term management directive in a way which minimizes downward impact on harvest of commercial species.

Through 77 -27- BF and other findings past boards have long recognized the value of silver (coho) salmon to the sport fishery. If the current board is concerned about negative impact a August 15 season closure date could have on Northern District set net harvest, remember that any change in overall Northern District set net salmon harvest could likely be positive, rather than negative, if the Board were to also adopt Proposals 93 and 203 and pass more salmon north through the Conservation Corridor. A higher proportion of increased August salmon harvest before the 15th would likely consist of commercial target stocks. This can be easily observed by looking at the positive change in Northern District set net harvest that has already occurred over the past 3 years, as a result of using the Conservation Corridor during July.

In hopes of helping the Board maximize benefit from Cook Inlet salmon fisheries for a maximum number of Alaskans,

Rod Arno, Executive Director
Alaska Outdoor Council



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February 9, 2017

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Attention: Board of Fisheries Comments for Upper Cook Inlet Finfish Meeting

The Alaska Salmon Alliance, is an Alaska-based corporation with offices in Kenai and Anchorage, certified by the the IRS as a 501(c)6, not-for-profit entity in February of 2012. ASA is part of the growing movement of individuals and organizations that support the culture of salmon in Alaska and advocate for research and education to improve science-based salmon management for the benefit of Alaskan communities and all user groups. (Additional information on the Southcentral Alaska commercial fisheries economic impact, see attachment)

The ASA wishes to note that it intends to work on issues and collaborate with members of the public to the extent practicable, and with members of the Board of Fisheries during the course of the Upper Cook Inlet meeting.

Below are some general areas of particular concern to ASA and our membership.

ASA does not support prescriptive management measures. Prescriptive management measures do not allow for annual variations in run strength and timing and inhibit local ADFG management expertise in the application of Emergency Order authority to implement adaptive management measures to optimize harvests for all sectors. Prescriptive measures include the mandatory use of corridors, windows, paired restrictions, 1% rules or changing escapement goals for different run sizes.

ASA does support scientific and sustainable fishery management measures and sustainable escapement goals (SEG). The ADF&G has determined that salmon escapements in excess of an SEG are not sustainable. ASA does not support any proposals that will allow the late run sockeye escapement into the Kenai River to exceed the current SEG of 700,000 – 1.2 million.



Paired restrictions: ASA supports the repeal of paired restrictions, noted in our support for proposals 168,169,171,172,176,177. At the last BOF meeting the board adopted a new concept called “paired restrictions.” The result was rules that unfairly burden commercial set net and drift net fishers in Cook Inlet and limit or restrict management decisions for no benefit. The effect is that if the inriver sport fishery that targets King salmon can’t prosecute that fishery without any limitation, the ESSN fishery is severely restricted. This is not an equitable way of balancing restrictions or contributions for conservation.

Further, “paired restrictions” undermine flexible in season management because it restricts the managers ability to open and close the fishery in times of abundance. This arbitrary imposition of restrictions of opportunity/time on ESSN results in immeasurable benefit to achieving king salmon escapement goals.

Finally, ASA thinks it is critical for the Board to remember the BOF’s mixed stock management policy. In particular the purpose and principles adopted by unanimous consent of the board:

- (1) The policy should provide that all users of salmon resources should share in actions taken to conserve the resource in a manner which is, ideally, fair and proportional to respective harvest of the stock in question.

Our organization believes this principle was abandoned at the last board meeting and should be the basis of the boards consideration of the any discussion regarding “conservation” in the rationale of proposals before the board in your upcoming meetings.

Large fish King goal : The department has been remiss in distribution of information to support this change, so providing a well-informed position is very difficult. The board needs to carefully assess the implication of the proposed new “large fish” goal because it reflects a substantial increase in the current escapement goal that will predictably result in additional restrictions of opportunity for the commercial fishing harvesters.

1% rule: ASA supports repeal of the 1% rule for drifters and setnetters, and supports proposals 94, 97, 137.

Changes to gear and net size: The ASA opposes changes in gear and mesh size as proposed in 141, but ASA also supports 174 that proposes to remove provisions that restrict the number and/or depth of commercial set gillnets in the Upper Subdistrict.

The “science” related to change of net or mesh size is anecdotal at best and disingenuous at worst. There is no credible science or data to suggest changing net sizes across the commercial fish fleet will result in benefits by any measure. At present, commercial fishers adopt net and mesh sizes to best meet operational needs restricted by a maximum limit established in regulation. To arbitrarily impose restrictions on all fishers for no benefit is more punitive than beneficial from a management perspective. Further, the cost of changing gear (if it is even available at this late stage) should not be trivialized. It is important to remember the size of nets also influences the type and style of running lines, buoys, and associated rigging necessary to fish in the ESSN. The cost imposed on fishers



who only fish several days a year to advance an objective with no scientific or management basis should be sufficient alone to abandon consideration of any changes to nets or gear in CI.

Importance of listening to Advisory Committees:

The Advisory Committee process and input is critical to the success of your board meeting. In most instances, AC's spend considerable time and effort to carefully review and debate each proposal before the board. Their recommendations are often the product of spirited debate, collaboration and compromise among various user groups. The AC process often provides a considered voice of the public who rarely can take the time to attend a BOF meeting and they should not be overshadowed by BOF 'regulars' who suggest they represent the view of a particular group or interest.

The reconstituted Anchorage Advisory Committee is an example of a fairly balanced group of individuals that are representative of thousands of diverse stakeholders involved in commercial, sport, personal use and subsistence fisheries.

Allowing partial deliveries by the ESSN fleet during an opening (No proposal number) but worthy of comment. 5 AAC 39.130 (d) ().

Definition of the problem: The ESSN fishery is complex and varied. It includes harvesters who work off shore as well as those who fish on beaches whose access is heavily influenced by extreme fluctuations of Cook Inlet tides. A strict interpretation of regulations, in particular interpretation of the term "time of delivery," requires a permit holder to deliver fish and wait for the "fish ticket" to be "closed out." This can often take hours resulting in the permit holder not being on the site while gear continues to fish.. If a fisher delivers fish, receives written acknowledgment of delivery from a buyer and returns to their fish site both the fisher and buyer can be subject to criminal and civil penalties. This system does not accommodate advances in technology or practice. Further it results in the department having to manage 5 to 6 times more fish tickets over the course of a fish opening that if only one fish ticket were used at the end of the opening. The fish transporter option does not fully address this problem due to the complexities of implementation and historical delivery methods of fishers and processors in the ESSN.

Recommended solution: The board should adopt regulations that allow for fishers and buyers to agree to a method of delivery that accommodates their respective business practice but also ensure ADF&G will continue to get timely and accurate harvest and delivery data. ASA looks forward to working with the ADF&G, DPS and the board to adopt a regulatory change that meets our common objective.

Sincerely,

Paul Dale, President
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**Testimony of Arni Thomson, Alaska Salmon Alliance
to the Alaska Board of Fisheries
Soldotna, Alaska
October 18, 2016**

The Alaska Salmon Alliance, is an Alaska-based corporation with offices in Kenai and Anchorage, certified by the the IRS as a 501(c)6, not-for-profit entity in February of 2012. ASA is part of the growing movement of individuals and organizations that support the culture of salmon in Alaska and advocate for research and education to improve science-based salmon management for the benefit of Alaskan communities and all user groups.

Background on the Alaska Salmon Alliance involvement in Alaska fisheries:

The ASA Board of Directors represent Kenai Peninsula-based seafood processors: Inlet Fish Producers; Icicle Seafoods; Pacific Star Seafoods; Snug Harbor Seafoods and Fishhawk. In addition, ASA represents Cook Inlet drift boat permit operators and numerous setnet fishing families that operate primarily in Cook Inlet salmon fisheries. ASA processors are major buyers in Prince William Sound and they also operate in Bristol Bay and the Kodiak area, buying not only salmon, but halibut, black cod and Pacific cod.

The McDowell Report, The Economic Impact of the Seafood Industry in Southcentral Alaska:

Although Southcentral Alaska is well-known for its world class recreational fishing, it is also hosts a vibrant commercial fishing and seafood industry. I have provided you today with copies of the Executive Summary, June 2015, an ASA contracted in-depth baseline analysis entitled, "The Economic Impact of the Seafood Industry in Southcentral Alaska." The report is based on state and federal databases. The report, and the executive summary are available on our website at www.aksalmonalliance.org.

The McDowell report provides an overall summary of the Southcentral Seafood Industry and then breaks it out into baseline community economic profiles for Anchorage and the MatSu Borough, Kenai and Soldotna, Homer, Seward, Cordova and Valdez.

The industry directly employed 10,840 people in Southcentral Alaska, including 7,660 regional residents, in 2013. Including multiplier effects, the seafood industry created an estimated 8,130 (FTE) jobs and \$411 million in annual labor income. Commercial seafood generated \$1.2 billion in total economic output in Southcentral Alaska in 2013. This includes \$685 million in first wholesale value of seafood products and \$501 million in value added through secondary impacts.



A total of 5,729 commercial fishermen live in Southcentral Alaska and participate in fisheries throughout the State. This is nearly a third (32 percent) of all Alaska resident commercial fishermen. Its 2,168 active permit holders, each of which are a small business, grossed \$308 million in 2013, accounting for 38 percent of all Alaska resident commercial income. The Anchorage/Mat-Su sector had 2,880 FTE jobs in the seafood industry with labor income of \$148 million and surprisingly, the City of Wasilla residents had commercial fishing revenue of \$20 million.

The Southcentral seafood processing sector employed an estimated 4,590 workers in 2013 and paid out \$61 million in wages. The workforce included 1,410 resident workers who earned \$20.3 million. The region contains 36 processing plants, including the new state-of-the-art Silver Bay Seafoods salmon plant that began operations in Valdez in the spring of 2016.

ASA also wishes to point out the intersection of Southcentral Alaska as a major driver in the Washington State and Puget Sound seafood and maritime industry. This is graphically illustrated in a companion study the McDowell Group also completed in 2015 : “Ties that Bind The Enduring Economic Impact of Alaska on the Puget Sound Region.” The report was jointly sponsored by Washington and Alaskan-based companies operating in Alaska. One of the largest employers is seafood at 23,900 jobs, 21 percent of the total Alaska related jobs. Alaska-related economic activity in Puget Sound falls into two categories: export-related and natural resource-related. The report is available on the Seattle Chamber of Commerce website.



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Limit all commercial openings during the second run of red salmon into the Kenai River to 12 hours in any 24 hour period.

Rationale: The 1,300 commercial permit owners are not the only user group for the resource. Multiple back to back to back emergency openings allows commercial nets to scour all fish from the river, negatively impacting the ability of all other user groups to catch fish. Limiting commercial openings (scheduled and emergency) will allow all users equal access to the resource.

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Modify 5 AAC 21.360 so that the second run of red salmon into the Kenai River is managed for equal access by all user groups.

Current verbiage: (a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance. The department shall also manage the commercial fisheries to minimize the harvest of Northern District coho, late-run Kenai River king, and Kenai River coho salmon stocks to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.

Proposed verbiage: (a) The department shall manage the Kenai River late-run sockeye salmon stocks to ensure equal access to the resource by all user groups based on abundance.

Rationale: Commercial fishing is not the only nor the primary user of the resource. The needs of 1,300 commercial permit owners should not outweigh the interests of 100,000 - 200,000 other users in upper Cook Inlet.



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Change the way emergency commercial openings for late run sockeyes in the Kenai River are proposed and approved.

Problem: Emergency openings currently are approved by either the ADF&G Kenai Commercial Fishing office or the Commissioner himself (or herself). This negatively impacts the availability of late run reds to other user groups on the Kenai. It also negatively impacts the availability of weaker salmon runs (coho, chum, pink and king) in Upper Cook Inlet.

Suggested solution: As all users are impacted, all users should have an equal voice. Any emergency opening should be approved by a majority vote of commercial and sport fish offices in ADF&G Kenai, Anchorage and MatSu offices. A tie vote means the emergency opening is not approved. The Commissioner will no longer have the ability to approve or direct an emergency commercial opening.

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Change escapement goals for the second run of red salmon up the Kenai River to a minimum of 2 million fish. Remove all upper goals (overescapement).

Rationale: New sonar counts about 40-42% more fish than the old system did. This means that when ADF&G manages to current escapement numbers, putting 40-42% fewer second run red salmon in the river. This has negatively impacted runs in the upper river such as the Russian, Hidden Creek, QQuartz Creek.



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~~Proposal 211

Opposed

Comment:

Contrary to this proposal, it would make more sense to close/restrict the Susitna River sport fishery if the Northern District set net fishery is closed by emergency order, as harvest information is provided to the set net fishery before salmon escapement into the river. It should also be noted that this proposal seeks to completely close the set net fishery if the sport fishery is even restricted. The Northern District set net fishery is affected by restrictions based on observable data, and to propose that the entire fishery is closed completely if the sport fishery is even slightly restricted is absurd and unfair.

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~~Proposal 209

Opposed

Comment:

The proposal cites 5 AAC 21.366 "The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions." The department declaring a priority management for sport/guided uses does not indicate that exclusive access is warranted. In 2015, the most current year available for harvest numbers, sport users harvested 5627 king salmon in the drainages of the Northern District, while commercial users harvested only 1923 king salmon. From 2011 – 2015, sport users harvested 24,504 king salmon in the Northern District, during which time commercial users of Northern District harvested 8,068. This shows that reasonable opportunity and priority for sport/guided uses is already more than sufficiently allowed under current regulation.

The current regulations state that "...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; in adopting the specific management plans described in (2) of this subsection the board will consider...the need to allocate the harvestable surplus among commercial, sport, guided sport and personal use fisheries" (5 AAC 21.363.2)

The current regulations allow for the maximum of 48 total hours of commercial fishing before June 24 in the Northern District King Salmon Management Plan. Emergency orders in recent years have closed and restricted fishing periods to be significantly less. This allows ample time for king escapement, with a bare minimum of 6.5 days of a week without any commercial fishing harvest. In recent years, most weeks during the Northern District Directed King Fishery have only observed 6 or 12 hours of commercial fishing (if any at all).

I view the well being of our salmon stocks as extremely important. I would like to encourage the Matanuska Valley Fish and Game Advisory Committee to seek ideas and proposals that would not exclude entire user groups from our shared salmon resource.



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~~Proposal 212

Opposed

Comment:

Commercial fishermen's livelihoods are directly affected by both the strength of the run, as well as the duration of the commercial fishing season. In 2012, low numbers of king and coho salmon created a situation in which emergency orders closed commercial fishing and thus shortened the season significantly. The effects of this reduced season were devastating enough on commercial set netters of the Northern District for the Pacific States Marine Fisheries Commission to declare the season a disaster. ADF&G closing commercial fishing periods during this and other seasons, although disappointing, was still recognized as a well warranted, as the decision was based on scientific data, and was carried out with the best interest of the future of our collective salmon resource in mind.

I would like to remind the Alaska Outdoor Council that coho are not a bycatch of the Northern District commercial salmon fishery, but a staple component of our livelihood. I do not feel that the Alaska Outdoor Council is in any position to determine commercial priority of salmon species, and certainly not in a position to declare that "A season that runs through August 15 provides plenty of opportunity to harvest Northern District salmon stocks..." Management should be based on scientific data, in which all user groups are allowed access to salmon surplus when it occurs.



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Chairman Jensen and Board of Fisheries Members,

My name is Andy Couch, I am a sportfishing business owner, and member of several groups working to increase Northern Cook Inlet salmon escapements to escapement goal range levels, and secondarily seeking to provide Northern Cook Inlet user groups more reasonable opportunities to harvest the abundance of Upper Cook Inlet salmon. The following are my personal thoughts.

Northern Cook Inlet Salmon Stock Status

Before any decisions are made concerning the plethora of fishery proposal before the board for the 2017 Upper Cook Inlet meeting, I believe it is critical to acknowledge the stock status of Northern Cook Inlet salmon:

King Salmon: Of the 17 king salmon stocks for which the Department of Fish and Game has established escapement goals the Board has already designated 5 as stocks of management concern (Alexander Creek, Goose Creek, Chuitna River, Theodore Creek, Lewis River). The Board has already designated 2 additional king salmon stocks (Sheep Creek and Willow Creek) as stocks of yield concern. After a period of 4 years with no legal in-Unit sport harvest, and the department's acknowledgement that it anticipates zero legal in-Unit sport harvest during the 2017 season, 5 additional king salmon stocks (Little Willow Creek, Montana Creek, Clear Creek, Prarie Creek, and Chulitna River) clearly meet criteria for designation as stock of yield concern as defined in 5 AAC 39.222 Policy for the management of sustainable salmon fisheries. Note: the policy clearly defines "yield," as meaning - "number or weight of salmon harvested in a particular year or season from a stock." The yeild concern stock status of these 5 additional king salmon stocks should be publicly recognized, acknowledged, and designated. Ignoring the facts will not make them go away -- nor does it improve management to attain escapement goal and once again provide yield for the board designated primary user of these stocks. With designation, 13 of 17 Northern District king salmon stocks with escapement goals would now be listed as stocks of concern.

Sockeye Salmon: The board designated Susitna sockeye salmon as a stock of yield concern in 2008 and adopted the departments action plan of primarily continuing with established fishing regulations, as the department studied the issue. In 2009 the department reduced Susitna sockeye salmon escapement goal numbers, out of regular board cycle, when it switched from evaluation based on the Yentna River sonar to a set of 3 weir-based escapement goals at Judd Lake, Chelatna Lake, and Larsen Lake. The minimum sockeye salmon escapement number measured on the Yentna River decreased from 100,000 sockeye salmon to 45,000 sockeye salmon as measured from the combined escapement range thresholds for Judd and Chelatna Lakes. Since establishment of the lower Susitna sockeye escapement standards in 2009, escapements of Susitna River sockeye salmon has continued to decline as measured by the combined Judd, Chelatna, Larsen Lake goals have only been met one time, in the same year, since being established. At the 2017 Board of Fisheries worksession in Soldotna, the department acknowleged its intention to again reduce all Susitna River and Northern District sockeye salmon escapement goals. Such a change would likely not only facilitated the continued decline of Northern District sockeye salmon salmon, but could also accelerate recent declines of co-mingled specific Northern District coho salmon stocks.

Coho Salmon: As the Matnauska Valley Fish and Game Advisory Committee representative during the board's October worksession, I presented department sport fishery harvest data that indicated the Jim Creek / McRoberts Creek coho salmon stock may now meet the criteria for stock of yield concern.

Since thatr worksession I obtained additional department generated sport fishery harvest data that indicated Little Susitna River coho salmon may now also fit the criteria for stock of yield concern. This data showed that 4 of the most recent 5 years on record of Little Susitna River sport fishery coho salmon harvest were the lowest for the past 20-year period. In addition, the 5th year of sport harvest was below the 20 year average for that same 5 year (2011 - 2015) period.

Stock of Concern Conclusions:

All 3 Northern District salmon species monitored with ADF&G established spawning escapment goals likley qualify for some form of stock of concern designation.

2 salmon monitored Northern salmon species (king and sockeye) already have some stock of concern designation, but now may meet criteria for additonal designations.

Only 3 Upper Cook Inlet coho stocks are monitored with escapement goals. All of those ccoho salmon goals are located in Knik Arm



drainages. 2 of those 3 coho stocks have a history, over the past 8 years, of sport fishery restrictions, closures, missed escapement goals and declining sport harvest. Jim Creek / McRoberts Creek coho and Little Susitna River coho now likely quality for stock of yield of 8 concern designation as measured by recent sport harvests from 2011 - 2015 compared to harvest from those same fisheries previous to 2011.

Stock of Concern -- Action

Looking at my copy of the Upper Cook Inlet road map, I see no area where stock of concern issues will be considered. I hope stocks of concern has not been dropped from consideration.

Northern Salmon Escapements Discussion / Action

I see where discussion of the Kenai River sockeye salmon goal and the Kenai River king salmon goal will take place, but see no discussion or place for action listed for Susitna sockeye goals, Fish Creek sockeye goal, Deshka coho goal.

After acknowledging Northern District stock of concern issues, I suggest considering long-term board planning for Upper Cook Inlet salmon fisheries, and then specific proposals, which follow the direction of the long-term planning and may offer some solutions to current stock of concern issues.

History and Board Findings

Since the board of fisheries was first established Upper Cook Inlet king salmon have always been a species of limited numbers and subject to downturns in abundance. There is a past history of Northern king salmon fishery closures to allow the stocks to rebuild to where they could once again sustain limited targeted harvests. Back in 1977 through board finding 77-27-BF the board recognized the value of managing "the king salmon and silver salmon as the target species for the recreational anglers (sport fishery)."

In addition the board found: "it is not the Board's intent to establish exclusive uses of salmon stocks: rather its purpose is to define the primary beneficial use of the stock, while permitting secondary uses of the stock to the extent it is consistent with the requirement of the primary user group."

"Stocks which normally move in Cook Inlet to spawning areas prior to June 30, shall be managed primarily as a non commercial resource."

"Stocks which normally move in Cook inlet after June 30, shall be managed primarily as non recreational until after August 15: however existing recreational target fish shall only be harvested incidental to the nonrecreational use;"

By 1978 Northern king salmon stocks had improved to where the first Northern King Salmon Management Plan was adopted creating a targeted harvest fishery exclusively for the sport fishery. In 1980 some Northern king salmon sport fishery regulations were liberalized to allow the harvest of 2 king salmon per day only one of which can exceed 28 inches in length, and additional waters were open to king salmon fishing and harvest at Deshka River (to the forks), Alexander Creek, and Lake Creek. See Board finding 78-42-FB.

It was not until 1985 that a limited Northern District commercial set net fishery targeting king salmon was established. In Board Finding 85-113-FB the board established clear expectations for the commercial fishery:

"Because there appear to be available chinook surplus for harvest, it is the Board of Fisheries intention to open the Northern District Commercial set net fishery. This is considered to be a very limited June chinook fishery, and strict time and gear limitations have been imposed.

It is not the Board of Fisheries intent to circumvent the Upper Cook Inlet Salmon Plan. The management plan provides priority for sport fishing during the month of June. If there is no harvestable chinook population identified beyond the sport fishery requirements, the Northern District commercial set net fishery will be closed."

32 years after the board established a Northern District commercial chinook fishery to harvest chinook salmon surpluses (beyond the sport fishery requirements) Northern king salmon (chinook) abundance has declined to the point that the Department of Fish and Game has issued pre-season emergency orders for the past 4 years restricting sport king salmon fishing and harvest on all 17 of the Northern king salmon stocks monitored by established escapement goals. Yet, the Northern District commercial set net fishery continues to harvest a growing share of what little harvestable surplus king salmon remain.

Repeal Northern District King Salmon Management Plan

To aid the attainment of Northern Cook Inlet king salmon escapement goals and to best maintain a limited Northern Cook Inlet king salmon harvest opportunity in which a maximum number of Alaskans and visitors may participate, **I support Proposal 209**. This proposal if adopted would repeal the Northern District King Salmon Management Plan, which provides an earlier May / June exemption to the standard Northern District commercial season start date of June 25 listed in 5 AAC 21.310 Fishing Seasons. It should be noted that the stated purpose of the Northern District King Salmon Management Plan is now obsolete: "The purpose of this management plan is to ensure an adequate escapement for king salmon into the northern District drainages and to provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions." There has been no harvestable surplus of king salmon beyond sport fishery needs as indicated by 4

years of department generated emergency sport fishing restrictions, and in many cases, sport fishery May 1 - July 13 harvest closures. Such a repeal of this particular management plan would also be inline with the long-term management directive mentioned earlier from Board Finding 77-27-FB: "however, existing recreational target fish shall only be harvested incidental to the non recreational use:"



Providing an opportunity for targeted commercial king salmon harvest when there was an abundance of king salmon beyond what the sport fishery could harvest makes some sense. While providing that same commercial opportunity at a time when king salmon escapement number are inadequate and entire sport fisheries are closed to all harvest does not. The number of provisions already included in this management plan shows the extreme difficulty in attempting to have paired restrictions for sport and commercial fisheries at times when stock abundance is so low. Allowing the fishery to start on the standard date of June 25 as listed in the commercial regulation booklet would still allow some incidental commercial harvest of king salmon inline with 77-27 FB.

Economic contributions of the king salmon sport fishery are significant, and this year the legislature increased both license and king salmon stamp fees. Most Alaska resident anglers purchasing an annual license and king salmon stamp are now required to pay \$39. Most nonresident anglers, however, must pay a minimum of \$40 (one-day license and one-day stamp) for an opportunity to fish for king salmon in Alaska. Money generated from license and king salmon stamp sales also bring additional federal match moneys back to Alaska. King and coho salmon management are largely paid for by sport fishing expenditures.

In Northern Cook Inlet waters nearly half of the summer's salmon sport fishing season is focused on king salmon, as there are extremely few other salmon available inriver before mid-July. Because of their willingness to bite a variety of baits and lures, and because of their availability in more Northern Cook Inlet fishing locations, coho salmon on most years provide even more harvest opportunity.

Deshka River King Salmon Management Plan

With the shortage of king salmon returning to Northern Cook Inlet, sport fishing seasons have been increasingly managed by preseason and inseason emergency orders the past 4 years. Management in this fashion has provide some sport fishing opportunity throughout the sport fishing seasons, but lacks the predictability of consistent regulations. It is difficult for guides to plan and sell fishing trips without knowledge of what the regulations will be. For example it is already February 9, 2017 and no preseason king salmon forecast or regulations have been put forward by the department. In an effort to provide more regulation stability and identify a point at which a king salmon season will start with the standard regulations printed in the book I wholeheartedly support the concept of **Proposal 230** which would create a Deshka River King Salmon Management Plan. After 4 years of emergency management the department has been unwilling to share with the public when the Deshka River king salmon fishery might start the season with standard in-the-book regulations. The ADF&G manager supplied the fact that every time the department's preseason outlook had called for a return of 21,000 or more king salmon the minimum Deshka River king salmon escapement has been attained. Therefore, it seems logical that the department may only need to issue restrictive emergency king salmon regulations when the department's outlook calls for less than 21,000 fish. The proposed plan then sets out in preferential order some restrictions that may be used. Having the list of restrictions in regulation makes it possible for a member of the public to make a regulation proposal if they would like to see a change -- otherwise, it is difficult for the public to make such a proposal addressing an emergency restriction that may no longer be in effect. Finally this plan recognizes the limited number of potentially good harvest days on the Deshka River. King salmon catching opportunities are often better earlier in the season, because the Deshka is a small slow moving river that drops and warms to the point that king salmon become lethargic and often don't bite well later in the season. For that reason the proposal makes clear that the department may return the fishery the following day -- if adequate numbers of fish have passed the weir. There would need to be no 3-day waiting period of lost harvest opportunity before the emergency order became effective. The department's vague opposition to this proposal, and unwillingness to specify an appropriate time to start a season with standard in-the-book regulations only further emphasizes the sport fishing public's need for such a regulation. Nothing in this proposal would restrict the department from making emergency changes, but it would better define the public's and department's expectations of how one of the most heavily participated king fishing in the Northern Cook Inlet would be managed. If any deficiencies were found the plan could always be updated in the future. If the department has no specific suggestions of how to make the plan better, I would encourage the board to put long established management practices (4 straight years of preseason emergency orders) into regulation. See Board finding 99--191--FB which deals with a different plan, but the same issue, from page 3: "The Upper Cook Inlet Management Plan was first adopted in 1978. Its predecessor was contained in a management policy, but this practice failed to meet the requirement that long established management practices should be adopted as regulations."

Susitna River King Salmon Management Plan

I submitted and continue to support the concept of Proposal 231, which would create a Susitna River King Salmon Management Plan for Units 2, 3, 5, and 6. These are the management units that have been entirely closed to all sport king salmon harvest for the past 4 seasons. With zero legal sport king salmon harvest for 4 years and ADF&G's acknowledgement of zero anticipated legal king salmon harvest for 2017 all streams with established king salmon escapement goals in these units should qualify for yield stock of concern. If designated as such, actions plans would be required to be written. Why not write a management plan, which informs the public of what to expect from these fisheries, rather than simply hiding an action plan in a place where the public will hardly ever see it? Considering the extremely low biological gain from starting emergency king salmon restrictions in these units May 1, I believe benefit from the limited king salmon resource could be better maximized by allowing standard king salmon regulations through at least May 31, at extremely low biological cost. At one time ADF&G started emergency king salmon regulations in these units on May 15 -- but then switched to the more restrictive emergency regulation date of May 1. When I asked why the date was changed, the answer I received was that it better aligned with a king salmon regulation on the Kenai River. If it is board intent to maximize benefit from the resource, then there absolutely needs to be a better standard for selecting restriction starting dates than going with a random date (for conformity) from not only out of the management unit -- but in this case -- entirely out of the management area. I've requested harvest and catch data from ADF&G (to be submitted later) which I believe should show allowing standard regulations before June 1 would cause no long term biological harm. As in the previous proposal, and as recognized by 99-191-FB, there is a requirement that long established management practices should be



Little Susitna River Weir Sanctuary Area

I support ADF&G's Proposal 233 to increase the sanctuary area closed to salmon fishing below the Little Susitna River weir, but wholeheartedly recommend amending the proposal (at least during king salmon season) to make the sanctuary area 3400 feet downstream of the weir / all the way to campsite #7. While the expanded sanctuary area all the way to campsite #7 closes off some additional water to fishing -- it also creates miles of better fishing above the weir when the salmon migrate sooner. The expanded sanctuary area has been used multiple years in the past and in my mind is a better solution. The problem is that upstream migration of king salmon is retarded by the weir. More than any other species, king salmon seems to stage below the weir, delaying their upstream migration by several days or even weeks. I believe this delayed migration is partially caused by boating and fishing activity in the area directly below the proposed sanctuary, and then boating traffic through the sanctuary area up to the weir. It is a common practice for anglers to boat up to the weir and ask how many salmon have passed recently. If no or few salmon have passed, many boat loads of anglers come back downstream through the sanctuary. The downstream boat traffic can then herd salmon out of the sanctuary and back into water open to fishing, where more fish get caught or harvested. Many anglers have learned that one of the consistently best concentrations of king salmon in the river occurs in or directly below the sanctuary area. Even if these fish are not caught they get continual harassment that further delays passage through the weir. When the river is under emergency restrictions retarded fish passage through the weir maximizes the number of restricted and closed to harvest days. This of course minimize use of the resource, and therefore minimizes benefit. Because of poor returns of both king and coho salmon and many days of restricted or closed to harvest fishing on the river use has dropped accordingly. With this drop in use ADF&G is proposing increased user fees to cover costs associated with the Little Susitna Public Use Facility Campground and Boat launch. If nothing is done to alleviate the number of restricted regulation or closed to harvest fishing days, increase user fees will only likely further drive down use. It should be noted that Little Susitna River has been one of the most popular boating destinations for king salmon and silver salmon anglers in the entire Northern Management Area.

Closed Waters -- within one mile of Little Susitna River confluence with Knik Arm

I support **Proposal 216** which would close waters within one statute mile of Little Susitna River to commercial fishing consistent with closed waters around many other Upper Cook Inlet stream confluences. The fundamental question is whether Little Susitna River salmon stocks should have equal protection with most other Upper Cook Inlet salmon stocks when staging in the stream mouth confluence area? If equitable commercial exploitation to most other salmon stocks is reasonable, then Proposal 216 is the best one of this group to support.

Supporting Consistent Northern Salmon Escapement Goals --

I encourage board member to review Northern sockeye salmon and coho salmon escapements both before and after the Department last decreased the Susitna River sockeye salmon escapement goals in 2009. I would encourage you to also review Northern salmon harvests during that same period. I am confident you will come to the same conclusions I have -- lowering the Susitna sockeye goal only led to lower salmon harvests by Northern users and lower escapements of both Northern Coho stocks and Susitna Sockeye stocks. Fortunately at the 2014 Board of Fisheries meeting action was taken to start changing some of those trends. That same mistake (lowering goals) should not be made a second time. Therefore -- if needed -- I request the Board adopt optimum escapement goals that would, at least, maintain Northern Stocks at their current management objective levels.

I appreciate your reading some of thoughts, but will have to sign off before expressing thoughts on all the proposals and concepts that interest me -- or even just all of the ones I support.

Thank you for your efforts to improve Upper Cook Inlet salmon management in manner that allows the maximum number of users a reasonable opportunity to participate in the harvest,

Andrew N. Couch





From: [Andy Couch](#)
To: [Haight, Glenn E \(DFG\)](#)
Subject: Comment to Upper Cook Inlet BOF-- Agenda Change Request -- Drift Gillnet Fishery Management Plan
Date: Friday, August 19, 2016 3:05:58 PM

AGENDA CHANGE REQUEST FORM

ALASKA BOARD OF FISHERIES

The Board of Fisheries (board) will accept requests to change its schedule under certain guidelines set forth in 5 AAC 39.999. The board will accept these agenda change requests (ACRs) only:

- 1) for a fishery conservation purpose or reason; or
- 2) to correct an error in regulation; or
- 3) to correct an effect on a fishery that was unforeseen when a regulation was adopted.

The board will not accept an ACR that is predominantly allocative in nature in the absence of new compelling information, as determined by the board [5 AAC 39.999 (a) (2)].

Please answer all questions to the best of your ability.

1)CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. If possible, enter the series of letters and numbers that identify the regulation to be changed. If it will be a new section, enter "5 AAC NEW".

Alaska Administrative Code Number 5 AAC: 21.353 Central District Drift Gillnet Fishery Management Plan

2)WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN

DETAIL THE NATURE OF THE CURRENT PROBLEM. Address only one issue. State the problem clearly and concisely. The board will reject multiple or confusing issues.

Although the purpose of the plan is clearly identified (a) The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District and Kenai River coho salmon in order provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions.

Section (e) states: From August 1 through August 15, there are no mandatory area restrictions to regular fishing periods, except that if the Upper Subdistrict set gillnet fishery is closed under 5 AAC 21.310(b)(2)(iii), or if the department determines that less than one percent of the season's total drift gillnet sockeye salmon harvest has been taken per fishing period for two consecutive fishing periods in the drift gillnet fishery, regular fishing periods will be restricted to Drift Gillnet Areas 3 and 4. In this subsection "fishing period" means a time period open to commercial fishing as measured by a 24 hour cedar day form 12:01 a.m. until 11:59 p.m.



The problem is: The Commercial Fish Division developed a totally different definition of two consecutive fishing periods. In both 2015 and 2016 the department did not count all drift periods as part of the two consecutive fishing periods. In particular during the 2016 fishing period — the drift fleet caught less than 1% of its season sockeye total on August 4, August 6, August 7, and August 8. This was a full 4 periods rather than 2 periods as called for in the management plan.

3)WHAT SOLUTION DO YOU PREFER? Or, if the board adopted your solution, what would the

new or amended regulation say?

I request the Board please clarify under section (e) of the management plan that two consecutive fishing periods, infant, does include all fishing periods — even restricted area periods.

4)STATEINDETAILHOWTHISACRMEETSTHECRITERIASTATEDABOVE.

If one or more of the three criteria set forth above is not applicable, state that it is not.

a) for a fishery conservation purpose or reason:

As stated in the preamble to the management plan the purpose of the plan, “is to ensure adequate escapement of salmon into the Northern District drainages” When the department allowed additional drift fishing beyond what the plan specified in 2015 there was a shortage of coho salmon escapement to the Jim Creek drainage and the sport season had to be closed by emergency order in a successful effort to meet the minimum escapement level. When the department allowed excessive drift gillnet fishing beyond specifications of the plan during the 2016 season the sport fish division had to close bait fishing for salmon in the Little Susitna River drainage starting on the scheduled starting date of August 6. As of August 19, 2016 it remains uncertain if the Little Susitna River coho salmon goal will be attained during the 2016 season. Also in 2016 the department once again had to close the Jim Creek sport salmon fishery (for all salmon species) this time starting on August 20 in an effort to meet minimum coho salmon spawning escapement goal needs. In addition during 2016 the department closed by emergency order a portion of the Northern District set net fishery in an effort to meet minimum Little Susitna River coho salmon escapement after the extra drift fishing opportunities.

b) to correct an error in regulation:

The plan needs to be clarified further to protect Northern District salmon escapements and reasonable fishing opportunity of Northern Cook inlet user groups.

c) to correct an effect on a fishery that was unforeseen when a regulation was adopted:

No one could foreseen that this plan would be interpreted by the department in such a manner as to increase drift fishery exploration of Northern bound coho stocks during the month of August — thereby increasing the likelihood of failing to attain escapement goal minimum levels.

5)WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR

CYCLE?

Although this is an agenda change request —by taking it up at this time, the Board will have the opportunity to consider it at the regular February 2017 Upper Cook Inlet meeting. If not taken up, and if other Board actions are not taken, the management plan may continued to be interpreted in such a manner as to go against the stated purpose of the plan for another 3 years before it may once again be addressed.

6)STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.

The management plan already allocates this fishery. Clarifying intent or stipulations of the



plan gives the department better direction as how to achieve objectives identified in the plan.

7) IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS

THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR

CYCLE.

See all information written above.

8) STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR (e.g.,

commercial fisherman, subsistence user, sport angler, etc.)

I am a Northern Cook Inlet sport fishing guide and sport fisherman.

9) STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL

OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING.

I know of no other ACR addressing this issue. The management plan was adopted by the board at the 2014 Upper Cook Inlet Board of Fisheries Meeting.

Submitted by:

NAME Andrew Couch

Individual or Group

PO Box 155

Address

907-746-2199

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Palmer, AK

City, State

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SIGNATURE: Andrew N. Couch DATE: 8-19-2016



Submitted By
Ben Allen
Submitted On
2/9/2017 2:01:24 PM
Affiliation
Millers Riverboat Service

Phone
9078926872
Email
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Address
4150 East Wickersham Way
Wasilla, Alaska 99654

I am Ben Allen- Matsu Valley Resident, Seasonal Fishing Guide, and high school ski coach. I own and operate Millers Riverboat Service, where I provide guided sportfishing services for salmon, throughout the Susitna Valley. I primarily operate out of the **Deshka Landing** and **Little Susitna River Boat Public Use Facility**. The strength of salmon returns to the Northern District are extremely important to my family, our community, visitors and the amazing river ecosystems, that exist in the Matanuska-Susitna Valley. I firmly believe Alaskans, rightfully deserve to see a new management approach, with new regulations set in place, that **provide maximum benefit for all Alaskans**. New regulations need to be set to ensure the long term sustainability and perpetuity of the precious salmon returns to the Northern District.

I support the following proposals.

213, 214, 215, 216- Is it appropriate to have a set net fishery for both King and Coho Salmon at the mouth of the Little Susitna River, given the highly restrictive King salmon sport fishery and failed Coho escapements? The public is choosing not to participate in the Little Susitna sport fishery, due to the significantly reduced reasonable opportunity to catch and harvest King and Coho Salmon. Alaska State Parks has proposed an increase in user fees at the Little Susitna Public Use Facility, to compensate for lack of participation. Historically the Little Susitna River has been one of the most important sport fisheries in the Susitna Valley. Without stronger Coho returns in 2014 and 2015- Little Su Coho would most likely be a stock of concern. The King Salmon sport fishery area has been restricted- (marker moved down from original weir marker at top of Indian hole) to protect staging Kings. Additionally the King salmon sport fishery has been restricted to catch and release 4 days a week in 2015 and 3 days a week in 2016. Also single hooks and seasonal limits have been implemented under Emergency Order Restrictions. The Little Susitna River Coho and King Salmon fisheries are currently highly unpredictable fisheries.

211- Zero harvest opportunity of Chinook Salmon has existed in units 2, 3, 5 & 6, since 2012, and has been highly restricted under Emergency Order since 2009. The argument that the Northern District Commercial fleet's impact is insignificant, is rendered useless, considering no harvest opportunity exists in over half of the Susitna Valley's most popular Chinook sport fisheries. While I am not opposed to catch and release; to accept it as the new norm due to lower returns while at the same time a 2nd in line priority user group is allowed to harvest Kings, I find highly unacceptable. I am not opposed to commercial harvest, but if King returns are too weak to allow harvest- conservation measures in the commercial fishery are necessary. It is unacceptable that in the Susitna Valley, the **ONLY** opportunity to harvest road accessible wild King Salmon is at the Little Susitna River and only on some days. According to the Department, returns are so weak, harvest of hatchery raised Kings is prohibited in Unit 2, while at the same time Kings are being harvested in the Northern district commercial fishery.

Please refer to the following memorandum established at the Board of Fisheries in 1985.

Alaska Board of Fisheries Policy Regarding Cook Inlet Northern District June Chinook Fishery Because there appear to be available chinook surpluses for harvest, it is the Board of Fisheries intention to open the Cook Inlet Northern District commercial set net fishery. This is considered to be a very limited June chinook fishery, and strict time and gear limitations have been imposed. It is not the Board's intention to circumvent the Upper Cook Inlet Salmon Plan. That management plan provides priority to sport fishing during the month of June. If there is no harvestable chinook population identified beyond the sport fishery requirements, the Northern District commercial set net fishery will be closed. 85-113-FB Ron Jolin Chairman Alaska Board of Fisheries Date

230- A specific management plan is necessary for the Deshka River King Salmon sportfishery. The Deshka River King Salmon fishery is the premier Chinook boat accessible sport fishery in the Susitna drainage. The Deshka River King Salmon fishery, has been primarily managed under Emergency order restriction since 2008. Currently regulations in this sport fishery are highly unpredictable. As of 2/9/17, those in the sportfishery industry do not know what the projection of Chinook fishery is for 2017 and what the regulations will be. Not knowing what the regulations will be, makes it difficult to plan trips.

233-



I oppose the following proposals.

226- I believe it is important to offer opportunity, especially when it has lower impacts on the fishery. Although I'd much rather harvest Chinook; I have participated in the catch and release fishery implemented by emergency order.



Submitted By
Birch Yuknis
Submitted On
2/9/2017 12:34:03 PM
Affiliation
Lifelong Alaskan

Board of Fisheries,

Thank you for taking the time to read my comments. I will attempt to be brief and get my point across.

Prop 213, 214, 215, 216 all have a common theme. I agree with all four and feel commercial fishing within one mile of the mouth of the Little Su does need to be closed at certain times to help with the dwindling King run on the Little Su. The Little Su is an important sport fishing river that needs to return to historic King numbers.

Prop 217 While well written I do not support. The author has lots of valuable information included in his proposal. The problem is that 88% of the Eastern District sockeye that he catches in his nets (from his chart) are bound for other Susitna Valley, Knik Valley or Turnigan streams most of which have dwindling sockeye and coho runs. I do support the Mat-Su AC's amendment to this proposal which allows for both Sport and Commercial fishermen to share the burden of conservation.

Prop 232 I usually like to agree with Fish and Game proposals but here I do NOT. Lowering the bar to 35,000 fish from 50,000 fish just to fit better with F&G's lower SEG is wrong. I do not want the SEG lowered either. This is an important fishery for residents and needs to be maintained rather than be allowed to dwindle.

Again Thank You for your time,

Birch Yuknis



Submitted By
Brian and Lisa Gabriel
Submitted On
2/9/2017 10:22:52 PM
Affiliation
Private Land Owners

Phone
(907)252-9524
Email
gabriel1@alaska.net
Address
2305 Watergate Way
Kenai, Alaska 99611

Dear Chairman Jensen and Members of the Alaska Board of Fisheries,

We are in OPPOSITION of PROPOSAL 201 as written.

We purchased our riverfront property in VIP Subdivision in 1994 and have since built our house and resided here since 2004. We are opposed to proposal 201 as written for the following reasons:

1. As responsible private land owners of property downstream of the Warren Ames Bridge, we made a substantial investment in a raised, light penetrating walkway that provides access to the Kenai River in front of our house. We, and many of our neighbors, are taking steps to protect the vegetation that stabilizes the bases of our bluffs and protects our uplands.
2. As a private land owner, we exercise our right to access the dipnet fishery, as we have for 23 years from our private property. We and our family, would like to continue to use our private property to dipnet.
3. Historically, when sensitive river habitat has been closed to bank angling, private properties have been excluded.
4. Our children, elderly parents and grandchildren have come to depend on the safe access that our private property offers them to harvest their fish from the dipnet fishery.
5. This proposal devalues our private property by closing our access to the dipnet fishery.
6. This proposal displaces our family by closing access to the common use resource which we have traditionally accessed from our own private property.
7. This proposal does not preclude us from doing any other activity at the river adjacent to our home other than dipnetting.

In summary, we agree that there is a need to take action to protect the sensitive habitat immediately downstream from the Warren Ames Bridge and to address the safety issue of pedestrians, bicyclists and motorists on Bridge Access road related to the increased use in this area during the dipnet season.

We would like to suggest an amendment to proposal 201 to limit the closed area from the Warren Ames Bridge to the downstream boundary of the Kenai River Special Management Area which will exclude private properties.

By adopting this amended proposal, you will have, in essence, addressed the concerns of ADF&G as outlined in the proposal while preserving the traditional access right of private land owners to this common use resource.

Thank you for your consideration.

Brian and Lisa Gabriel



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

From: Brian West
1000 Oceanview Dr
Anchorage, Alaska 99515



I am providing comments on the following

Alaska Board of Fisheries 2016/2017 Proposed changes in Lower Cook Inlet Finfish, Kodiak Finfish, Upper Cook Inlet Finfish and Statewide King and Tanner Crab; and Supplemental Issues

Comments

Upper Cook Inlet Finfish

Proposal 34. Against. The proposer's argument is that since a lot of people break a rule it should be repealed. There is no logic in this. I take exception to his claim that 100% of private anglers party fish. I do not, nor do the people that I know. The proposer also indicates that it is too difficult to keep track of the fish he has caught. Again, this is no reason to change the rule. This proposal is basically a request to increase bag limits. Until such a time as the Fish and Game can justify increasing bag limits I suggest the proposer learn to count or at least take notes.

Proposal 144. Support if modified. The proposal is unclear. It states that the next legal bag limit must be kept. This will not solve the problem identified unless the bag limit is one fish. If the bag limit is three fish the person can just keep releasing fish and will not reach the bag limit. The proposal should be changed to read that "when proxy fishing, once a bag limit is taken the next legal fish must be retained."

Proposal 151. Support. A barbless hook is nothing more than a way to reduce the numbers of fish landed. If you have to hook and fight six fish to land one how is that good for the fishery?

Statewide

Proposal 267. Against. The estimated abundance level of 200,000 crab is too low to sustain the resource. This number is half of the long term average abundance level. However, the statistics used include numbers when the stocks were low or depressed due to overfishing. Using these lower numbers skews the abundance level down. The department has not had a good record for management of crab stocks in Southcentral. Viable fisheries for King, Tanner and Dungeness crab all existed, but, were destroyed by overfishing. The King crab fishery in Kachemak Bay is a prime example. The fishery was closed in the 70's reopened after a few years and then crashed forcing it to be closed once again. And it still has not recovered.

Proposal 268. Against. Same comments as for proposal 267.

Proposal 269. Against. The proposer indicates that the Fish and Game does not have data from the area. How can a fishery be contemplated when no data exist as to the abundance of the resource?

Proposal 270. Against.



February 9, 2017

Mr. Glenn Haight, Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Board of Fisheries Comment for Upper Cook Inlet Finfish Meeting

In an opinion piece published in the Peninsula Clarion on February 7th, Mr. Karl Johnstone made his opinion about commercial salmon fishing very clear – he doesn't like it one bit. His opinion and strong prejudice against commercial fishing were always very evident during his years as a member, and then as the Chairman, of the Alaska Board of Fisheries. During Mr. Johnstone's time on the Board, the viability of the commercial salmon fishing industry in Cook Inlet was systematically undermined while the interests of the guided sport fishing industry were actively promoted.

Mr. Johnstone's opinion piece was full of the same type of propaganda that he and others have been pushing for years: there is not enough salmon in Cook Inlet for all users; Cook Inlet salmon can't compete with farmed salmon, sportfisheries are so much more valuable than commercial fisheries; etc, etc. These arguments do not stand up to reality.

Wild Alaska salmon have a solid market niche and Cook Inlet sockeye is a very premium, sought-after product in America. The worst economic lie that he and his cohorts have been promoting is that the sport industry and personal use fisheries could actually grow large enough to replace the value of the commercial industry to our state. It can't happen. There is no way that the available, renewable, surplus salmon in Cook Inlet could be harvested without commercial fishing; even if you lined every inch of every beach with personal use dipnets or setnets. In-river fishing capacity is already maxed-out. For each of the past six years the Kenai River has had over-escapements. All of the dipnetters and anglers in the river could not harvest the (average annual) half a million excess sockeye that swam through.

When properly managed, Cook Inlet is the 4th largest commercial salmon fishery in the state. With good management, there are enough salmon in Cook Inlet for everyone. And we need the economic benefit for all the users, especially now. There are millions of unharvested salmon every year in Cook Inlet that commercial fishers are prevented from catching – they are wasted.

It is time for the Board of Fisheries to repeal the myriad of arbitrary, unscientific and obstructive restrictions on commercial fishing that have made it impossible for ADF&G to manage the fishery properly and deprived the industry and local and state governments of the value of proper harvests. I support proposals 89, 90, 94, 117 and 129.

Catherine Cassidy
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Submitted By
Charles W. DuCharme
Submitted On
2/8/2017 6:18:59 PM
Affiliation
Individual State Resident

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In the best interest of the bank habitat preservation within the Kenai River Dipnet area, I recommend rafts and small vessels still be allowed to put in the river under the Ames Bridge. Then the area between the No Name Creek and the Warren Ames Bridge cannot have dipnetting from shore; also no boats drifting while dragging dipnets in this portion of the river. Only anchored vessels may place a drift net in the water in this zone. This would allow smaller vessels to stay away from big boat activity (dangerous) while yet making dip netting affordable to lower income people whom need the fish most of all. This would increase safety for smaller vessels and protect the bank habitat in this area. I would suggest this could be a win-win scenario. Thank you for seeking a smart compromising idea and considering my suggestion.

Charles W. DuCharme

Submitted By
Charles W. DuCharme
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2/8/2017 6:42:29 PM
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Modified my initial Idea to address wakes and size motors:

In the best interest of the bank habitat preservation within the Kenai River Dipnet area, I recommend rafts and small vessels still be allowed to put in the river under the Ames Bridge. Then the area between the No Name Creek and the Warren Ames Bridge cannot have dipnetting from shore; "also no wakes or motors over 40HP" and no boats drifting while dragging dipnets in this portion of the river. Only anchored vessels may place a drift net in the water in this zone. This would allow smaller vessels to stay away from big boat activity (dangerous) while yet making dip netting affordable to lower income people whom need the fish most of all. This would increase safety for smaller vessels and protect the bank habitat in this area. I suggest this could be a win-win scenario. Thank you for seeking a smart compromising ideas and considering my suggestion.

P.S. This idea could be modified to allow smaller vessels/motors to only drift dip netting in this zone between No Name Creek and Ames Bridge.

Charles W. DuCharme



"Village with a Past, City with a Future"

210 Fidalgo Avenue, Kenai, Alaska 99611-7794
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January 31, 2017

Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526

Alaska Board of Fisheries Members:

The City of Kenai respectfully submits the following comments for your consideration on the listed Board Proposals:

Proposal 201 – This proposal closes the shore based Personal Use Salmon Fishery on the Kenai River from the Warren Ames Bridge to the Mouth of the river. While this closure will not negatively impact the operations or finances of the City of Kenai, it is highly impactful to residents of the City of Kenai in the proposed closure area who regularly dip net from their private property. The City of Kenai requests that this proposal be amended by moving the downstream closure boundary to the western boundary of Section 16 of Township 5N, Range 11W as depicted below. If the City's proposed amendment is adopted, Proposal 201 will still accomplish its primary objectives of protecting the sensitive vegetated tide land area on the north and south shores of the river in the area immediately below Warren Ames Bridge and eliminating overcrowding issues at the Kenai Flats Day Use Area.






Proposal 203 – This proposal would allow the Commissioner to extend the Personal Use Salmon Fishery through August 10 if sockeye escapement numbers are projected to exceed 1,200,000. If adopted, this proposal would have potential negative impacts to the finances of the City of Kenai and hinder the City's ability to provide continuing services in support of the fishery. If the Commissioner was given this authority, it increases the potential of the fishery being re-opened after an earlier closure. When the fishery is prematurely closed by emergency order, the City of Kenai reduces staffing levels and dismantles all of the infrastructure it put in place to support the fishery, including dumpsters, porta potties, pay shacks, and IT infrastructure. If the fishery were re-opened, the City would have to reinstitute our support of the fishery, incurring significant costs. Additionally, it is likely that participation during the first ten days of August would be lower, resulting in lower revenues to the City from participant fees without a commensurate reduction in costs. The City of Kenai is opposed to the passage of this proposal.

Proposal 204 – This proposal would extend the Personal Use Salmon Fishery upstream of Warren Ames Bridge to Cunningham Park. This will increase impacts to City residents who own property along this stretch of the river to include trespassing, noise, and boat wake. It will also create crowding and facility capacity issues at the City-owned Cunningham Park, since fishery participants will be able to traverse to that location by boat at any time without having to cut the fish tails and mark their permits first. Additionally, because of substrate differences, the riverbank in the area between Warren Ames Bridge and Cunningham Park may be more susceptible to erosion than the area below Warren Ames Bridge. The width of the Kenai River in this area slowly narrows as boaters move upstream which will certainly result in greater congestion with additional boat traffic, heightening safety concerns. Because of the increased traffic and use of Cunningham Park, this proposal will expand the City's fee area and cost of operating the fishery. The City strongly opposes this proposal.

I appreciate the opportunity to provide comments and can provide additional information or clarity on the City of Kenai's concerns if requested.

Sincerely,



Brian Gabriel, Sr.
Mayor



Paul Ostrander
City Manager



Submitted By
Constance Markis
Submitted On
2/8/2017 8:27:47 PM
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For the past three years, Alaskans who rely on dipnetting sockeye salmon from the Kenai River have been blocked from fishing after July 31st, which denies them a fair chance at catching their limit of fish. The sockeye salmon runs have been arriving later in the season, which results in a substantial part of the Kenai River run entering the river after the Alaska Department of Fish and Game has closed the dipnet fishery. At the same time, commercial fishermen have been allowed to take advantage of continued strong returns well into August. The sockeye runs into the Kenai River are coming in later and while the commercial fishing industry is important, it is wrong to block individual Alaskans from dipnet fishing while commercial fishing is extended to August when the runs are strong.

Lets protect the Kenai River sockeye and silver runs while still allowing dipnet fishing to remain open into August. Of course, any extension should end if it endangers the fall silver salmon run, which is the current rule for commercial sockeye fishing.

It seems only fair that the department should allow the same opportunity to the more than 600,000 Alaskans that do not own commercial fishing vessels or permits as they do to commercial fishers. Thank you for your consideration.

Sincerely,

Constance (Connie) Markis



Submitted By
Dale Miller
Submitted On
2/8/2017 9:34:14 AM
Affiliation

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As the Board is aware, due, in my opinion, to the changes in climate, the sockeye salmon run into the Kenai River seems to be returning at a later date than it did just a few years ago. Where the largest runs could be counted on to come through in mid July, it appears they are arriving in the largest numbers after the July 31 dipnet closing.

The Board has extended the Commercial Fishery opportunities, when it does not impact the silver salmon or sockeye salmon escapement goals, and I feel the Board should allow the same opportunity for the personal use fisher.

Penalizing one user group in favor of another is contrary, I would hope, to the goals of the Board, and quite possibly the Statutes of the State of Alaska. At the very least, it should be cause for concern if it isn't.

In considering an amendment to proposals 202 and 203, it is my hope that the Board can find a way to allow personal use dipnetting to be extended in the same manner as commercial fishing with the same goal of adequate escapement, and should be able to close personal use dipnetting, just like they do commercial fishing, when there is concern that the escapement goals will not be met.

In closing, I urge the Board to adopt a policy that allows for equal access to the fish when the Board feels it can extend the season while not negatively impacting the resource. There is no justifiable reason to show preference for the commercial fisheries over personal use.

Thank you for the opportunity to submit my comments.

Sincerely,

Dale Miller



Submitted By
Dan Norman
Submitted On
2/6/2017 9:28:47 PM
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Board Members,

Unfortunately I am unable to attend this board due to a work conflict, but I still wanted to provide some input on a couple issues that are important to me. I have had the great privilege in participating in the fisheries of Cook Inlet as a recreational user, commercial guide, a set net and drift fisherman. I am an Active Duty Soldier, but this fishery continues to draw my family and friends, from around the world, together during the fishing season. The first thing we need to realize is that this fishery is a valuable resource to all Alaskans. Each group has a right to harvest, but to undermine one user group is flat out wrong. Unfortunately the commercial users have a limited voice due to the limited entry laws. So it is unrealistic and unfair to see the large numbers of recreational users and commercial sport guides as a more valuable user group because they have a larger demographic.

I would like to see is a gradual return to the historic fishing periods. I believe that there is a very strong case for the North K-Beach section to fish whenever the Kasilof section is fishing as stated in Proposal 136. There is plenty of data to show that this section of beach catches a significant number of Kasilof bound fish. Additionally, there is evidence that a large number of salmon enter the mouth of the river from the North. The Kasilof River continues to go over the top end of the escapement goal. This additional harvest opportunity would be a way to harvest sockeye while minimizing king catch by using beach nets only and also only using shallow gear (29 meshes). This coincides with the second proposal I support which is Proposal 112. My wife and I both carry dual permits and this proposal would allow us to fish a total of four nets in the KRSHA. Some language that I think needs attention is the language restricting the amount of gear on board while participating in the KRSHA. Currently I can only have 3 nets on board, but if proposal 112 is passed then I would like to be allowed to carry and fish all 4 nets in the KRSHA. I also would like to see the Kasilof section fish with a maximum web size of 4 ¾ inches. The data shows that the Kasilof section is harvesting approx. 37% of a 2 ocean fish. These fish are typically a little smaller than a 3 ocean fish. But what we see from the fish that make it into the river is that the escapement is comprised of approx. 67% 2 ocean fish. The Kasilof section purposely uses bigger gear to harvest Kenai Bound fish and allowing Kasilof Fish to swim through the nets. The consequences of this are that the river is over-escaped. They catch 68% of the kings on the ESSN and do so by wearing a cloak that they are a separate fishery. If they are a separate fishery then they will be managed to be such and target the fish that comprise 67% of the escapement by using smaller mesh size webbing.

By reining in the Kasilof section and making it a more efficient Kasilof fish selective harvester, then there is a savings in Kenai and Kasilof Kings for the Fleet and allow a greater number of Kings to both rivers. By allowing the North K-Beach section to harvest Kasilof bound fish then there is a savings in Kings as well as beach nets as a very efficient harvester of sockeye while having a smaller percentage of king harvest vs the rest of the fleet.

Another proposal I would like to see passed is proposal 140. This proposal would incentivize the use of shallow nets by adding length to the nets. This added length is still a reduction in total surface area of the net, and the net will more efficiently harvest sockeye salmon while reducing king harvest. I have fished shallow nets for several years and there is a king savings, where I fish, between a 29 mesh net and a 45 mesh net.

On the topic of Kings, I believe a restructure of the Kenai River King Salmon Management Plan is morally just. The language is intended to be punitive to the set net industry in August. The way the plan is written now, it allows a liberated fishery in July, which allows for all users to harvest salmon. Suddenly in August the goal posts move and the liberalized fishery comes back to close the set net fishery in order to benefit the sport user. So the management plan is written with the intended consequence of a win-lose for the commercial fleet and a win – win for the sport industry. We need a consistent goal for the users and the managers to follow. We should be managing the exact same way in July as we manage in August. Anything else is just asinine. Additionally, I believe that the use of a “big King goal” is punitive to the set net fleet. While the set nets do catch kings, there is a disproportionate catch of small jacks. The needs to be a way for the set net fleet to report a small king vs a big king. I am reluctant to agree with this management plan, but I do believe there is a serious jack problem in the Kenai River. The catch of jacks, both sport and commercial, should be a non-issue when it comes to management plans and harvest.

Lastly, I support Proposal 124. There is not a lot of money in the pink fishery, but in the age when we have been sliced and restricted every bit helps to pay the bills. The pink fishery allows for a harvest of a fish that has little to no sport benefit to the river. In fact, I would argue that the sport users would like to see fewer pinks in the river.

I thank you for your time and I appreciate you reading my comments. I wish I could attend this board, as this is the future I wish to pass down to my children and allow them to fish these waters that I have fished for the past 30 years.



Sincerely,

Dan Norman

Support:

112, 124, 136, 140, 165

Oppose:

103, 100, 101, 205



2/9/2017

Darren Platt
darrenplatt@yahoo.com
F/V Agnes Sabine, owner-operator

ATTN: Board Support

To the Alaska Board of Fisheries

I'm writing to address the public sentiments concerning salmon harvests in the Kodiak management area(KMA). I understand that this is not part of the agenda for the Upper Cook Inlet(UCI) board meeting; however, after the publication of the genetic stock assessments of KMA harvests, Kodiak management appears to have become a central focus of a few advocacy groups and therefore warrants balanced input for the public record.

Salmon harvests in the KMA are not "new and expanding"

Kodiak is the oldest mixed stock fishery in the state, with a legacy dating back over a hundred years. Canneries on the Karluk spit processed fish harvested up and down the west side of the Kodiak archipelago as well as fish caught in a wide range along the Peninsula of Alaska. No aspect of this fishery is "New or Expanding" nor have harvest patterns noticeably changed for decades. Tagging studies conducted in the past have revealed the presence of Cook Inlet sockeye as a component of KMA harvest - a fact known to fishery managers and fishermen for many years. Although the recent genetic stock assessments provide a new quantification of those harvests, the report provides no new information - just a novel presentation of old knowledge. To the thousands of individuals whose livelihoods depend on responsible and stable management in the KMA it would cause great confusion and consternation for there to be a sudden and rash change to the management plan based on information that has been readily available for many years.

Kodiak is not Managed for the Targeting of Cook Inlet Stocks

There appears to be a misconception amongst some members of the public that KMA management is somehow currently designed to target Cook Inlet stocks. To be clear, Kodiak is a mixed stock fishery with multi-species management that only focuses on escapement based targeting of local stocks along with a small but economically critical allocation of Chignik stocks. Cook Inlet bound sockeye are inevitably caught incidentally to local harvest. According to the genetic report, with only one exception that occurred during a very anomalous and brief harvest event, Cook Inlet sockeye rarely comprise even a simple majority of the sockeye harvested in any of the sampled Kodiak districts. When additionally accounting for harvests of local pink, chum, and silver salmon which were caught along with Cook Inlet bound and local sockeye, it is clear that the overwhelming majority of salmon harvested in every surveyed area of the KMA are local stocks. Ultimately, the integration of Cook Inlet bound sockeye with Kodiak stocks in the KMA is as unpredictable as it is unavoidable. Although some vocal groups advocating for the curtailment of Kodiak harvests may lament this fact, it is incumbent on our fishery managers to make their decisions



based on true characteristics of salmon, which do not conveniently segregate themselves from local stocks while passing through Kodiak waters.

Science is in the Details, not the Headlines

It is the board's responsibility to give precedence to scientific conclusions over public hysteria. Although I agree that it is the role of the board to openly and transparently respond to *any* issue or concern raised by the public, it is equally important for those responses to be calculated based on the best available science. During the most recent meeting in Kodiak, board member Payton cited the necessity of relying on and trusting state scientists' recommendations when casting his vote against the emergency opening of a Bering Sea Bairdi season, despite the strong public push in favor of allowing limited crab harvests. The public should expect - and deserves - the same adherence to scientific principles when considering salmon management in the Kodiak area. Not only does the genetic report clearly state that these studies are riddled with flaws and uncertainties, leading to high margins of error, but more importantly, the scientists who presented the report have unequivocally declared that the study *cannot* be used to make inferences about harvests in other areas or at other times nor can the information be used to predict future harvests.

Additionally, it is very clear from the data, and was openly acknowledged by both the Board of Fish and the ADF&G scientists that there is very high inter-annual variability to the data, verifying the long held knowledge by Kodiak fishermen that the arrival of Cook Inlet stocks in the KMA is extremely unpredictable. Any attempt to alter Kodiak fishing patterns based on the hope of limiting harvest of Cook Inlet stocks would be ineffective, unscientific, and would primarily produce the outcome of simply hindering the responsible management of local Kodiak stocks.

The details and conclusions of the genetic stock assessments have been neglected and ignored by individuals and institutions who would prefer to cripple the Kodiak fleet in speculation that such efforts will benefit them while inflicting a disproportionate cost to the Kodiak community. While the public has no obligation to adhere to scientific principles in their requests to the board, the same standard does not apply to the board, who ought to consider the recommendations of the Department of Fish and Game and make decisions rooted in science and law.

The Actual Numbers

Although some public expressions appear to indicate that KMA harvests of Cook Inlet bound fish are the determining factor to run strength within the UCI area, a quick analysis of data clearly proves otherwise. The 2016 genetic stock assessments speculate a KMA harvest of approximately 386,000 UCI bound sockeye, a number which is dwarfed by the 3.1 million fish harvested commercially in Upper Cook Inlet and 5.1 million fish that returned to the area. When also accounting for mixed stock harvests in Lower Cook Inlet, Chignik and Area M, Kodiak harvests likely account for less than 5% of the total UCI sockeye returns. Additionally, according to the 2016 annual management report for UCI, 2 of the 5 monitored sockeye systems suffered over-escapement, 2 were within escapement goals and 1 "fell just short of escapement objectives." It is difficult to reconcile the depiction of an escapement crisis in UCI with the fact that multiple systems have been consistently experiencing over-escapement, with no prevailing under-escapement problems within the monitored systems, all while still affording the commercial harvest of millions of fish within the UCI area.

If UCI is in fact suffering from escapement and personal harvest shortages, as some members of the public indicate, then it would be far more effective to address those problems in the UCI area itself, where the vast majority of these fish are harvested and where management decisions can more accurately and effectively produce the desired outcomes. Limiting harvest in the KMA with the intention of optimizing returns to UCI would be highly ineffective at achieving the desired goal and would primarily result in hampering the ability of the Kodiak fleet to harvest local stocks, which clearly comprise the majority of harvests in the area. The board is bound by article VIII of the Alaskan



constitution to manage fisheries based on the sustained yield principle along with ensuring the maximum benefit of the Alaskan people, a standard which cannot be met while drastically limiting harvests in the KMA when less impactful and more focused adjustments on management in the UCI area would better accomplish the same goal without producing as collateral damage the lost harvest and ineffective management in the KMA, the impacts and volume of which would by far exceed the benefit conveyed by the few additional sockeye that may reach the UCI area as a result.

North Shelikof Straight Sockeye Management Plan

After the anomalous and unrepeatable sockeye harvest in 1988 of what was perceived to be a "non-traditional harvest pattern" of UCI salmon, the state of Alaska hastily adopted the North Shelikof Straight Sockeye Management plan, a burden that the Kodiak fleet has had to bear ever since. This plan already limits Kodiak harvest activities in a way that is arguably burdensome beyond the proportion to which UCI salmon are typically harvested in Kodiak. Additionally, since the plan is based on a set harvest allocation within the KMA, the burden of conservation due to this plan is greatest on years of highest sockeye abundance which leads to rapid closures of the seaward zones, requiring the KMA seine fleet to forsake harvest volumes that are disproportionately large in comparison to the conservation benefits. In addition to curtailing the harvest of Cook Inlet stocks, this management plan severely limits the Kodiak fleet's ability to harvest local stocks in the North Shelikof Strait. Closures designed to protect UCI stocks are triggered even by harvest of North Shelikof sockeye streams including Thorsheim, Long Lagoon, Foul Bay, Malina Creek, Swikshak, Kafia and Kuliak, as well as fish traveling to other systems within the KMA including Karluk, Ayakulik and Spiridon bay, to mention a few.

It is my fear that the emotional public reaction to the genetic stock survey will once again trigger the implementation of a poorly conceived management plan designed largely to satisfy a restive and vocal subgroup of Alaskans without regard to the actual outcomes achieved through the changes. This would further place the Kodiak fleet under an onerous management policy that delivers no net benefit to the state and likely results in overall loss of harvest and significant damage to Kodiak's already downtrodden fishery dependent communities. For these reasons, I implore the board *not* attempt to re-address the KMA during the Cook Inlet board meeting nor to declare an out-of-cycle emergency meeting designed to address a crisis that does not exist in a fishery that hasn't changed in decades. Instead, if the public desires, it may be prudent to form a workgroup comprised of Kodiak fishermen, ADF&G department staff, UCI stake holders and Board of Fishery members in order to further the discussion and provide a balanced dialogue so that matters concerning the KMA are better understood and management decisions can be rooted in science, reality and legal code rather stemming from a one-sided public frenzy that resulted from a flawed and superficial interpretation of the recent genetic report.

Sincerely,
Darren Platt



David Hillstrand

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Homer, Alaska 99603

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Board of Fisheries Members; Regarding Upper Cook Inlet

I would like to review with you Laws, Regulations, and Supreme Court Rulings that apply to Allocating issues, Limitation of Harvest abilities between different users, Harvest Limits, History of Limited Entry and its qualifications, Conservation, Common Use, and financial benefits to all residents of Alaska and the USA, with the importance of the Chairs position and how it should be tied to the Area Biologist recommendations.

It is vital and important for you as Board Members to bring stability to the Area, by education and adhering to the Law and our Constitution you will bring calm to the conservation of our fisheries and people of The State of Alaska.

1. Please read the following Laws and Regulations and Supreme Court Rulings. I will let you look them up to save space and paper.
 - a. 5 AAC 77.001 (b)
 - b. Pullen V. Ulmer
 - c. Lieutenant Governor of the State of Alaska V. Alaska Fisheries Conservation Alliance, Inc.
 - d. Escapements and Returns from ADFG for the Kenai and Kasilof Rivers. History of the Area returns from the 1880 to date.
 - e. Call the Local Area Biologist and talk with them in each area before you travel there. (907) 262-9368
 - f. Limited Entry, qualifications, optimum number in each fishery, Alaska Resident held compared to out of State residents.
 - g. Alaska Constitution and Common use, how it applies now to our Fisheries, Oil industry, and Mining
 - h. Economic Study of the loss of income from lack of harvests from over escapements.
2. Currently the BOF has allocated excessive fish to the Upper Cook Inlet Rivers with area and time restrictions. It has gotten to the point that these Actions are causing diminished returns and loss of economic value to the State of Alaska and its 700,000 plus residents. The loss of revenue to the State and Local communities needs to stop. Recent studies have shown losses in the millions; which in our current Fiscal dilemma hurts the State and its people.
3. Continued legislative petitions from an Alaska Senator and passed Law suits trying to eliminate Set Netters; are continued pressures to put more fish in the river, this is leading to stress. Even



with over escapements in the last 5 years, they still want more, without the ability to harvest all of the excess. With warming waters stress from over escapement may escalate Lake Survival; and we are starting to see this with Grayling and Silver salmon.

5 AAC 77.001 (b) of the personal use regulations

- a. (b) It is the intent of the board that the taking of fish under 5 AAC [77](#) will be allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest.
- b. All three are happening and you need to address it.
 1. **Jeopardize the sustained yield of a resource.**
 - a. Over escapements is one of the main reasons for diminished returns, especially with warming oceans.
 2. **Negatively impact an existing resource use.**
 - a. Economic losses have happened in the loss of revenue to the communities and the State of Alaska, as well as over escapements.
 - b. There are existing users; commercial fishers. The personal use fisheries should take place before July 1st and after August 1st on the Kenai Peninsula and with the Pink salmon that are not harvested as they should be.
 3. **Is in the broad public interest. Read Supreme Court Opinion**
 - a. Lieutenant Governor of the State of Alaska V. Alaska Fisheries Conservation Alliance Inc.
 - b. Opinion states that Commercial fishing permits are of greater value to the State of Alaska and in the broad public interest.
 - c. Personal use and Sport fishing which is sport snagging in the Sockeye fishery which is illegal cannot harvest all of the fish that return.
 - d. Remember this is an urban area not a Rural Subsistence area.

Pullen V, Ulmer

- a. A case that tried to eliminate Commercial fishing, and give priority to Sport, Personal use and Subsistence fishing. The Opinion requires that room be given to the public that participates in Commercial fishing.

Lieutenant Governor of the State of Alaska V. Alaska Fisheries Conservation Alliance, Inc.

- a. 63 64

Permits, which are limited in number, hold significant value, and may be bought and sold.⁶⁵ and unlike noncommercial hunting and fishing licenses, these set net permits carry over from year to year. This makes commercial set netters a far more cohesive, recognizable, and permanent group than individuals who hunt wolves



using same-day aerial techniques or snares, or who hunt bears using baiting or feeding methods. The latter individuals must generally apply for permits and licenses annually,⁶⁶ and those who wish to participate in more heavily regulated hunts have no guarantee that they will be

- e. **It is in the Publics Board interest to favor with preferential treatment those that participate in the fisheries through Commercial fishing.**
- f. **The Supreme Court gave direction to the public on the value to the State for Commercial fishing Limited Entry Permits.**

Alaska Constitution and Common use, how it applies now to our Fisheries, Oil industry, Mining and Land.

- a. I can understand the public thinking that every fish, animal and mineral are every individual's entitlement. So let's take this argument and apply it to the resources.
- b. Fish on the Kenai River we have a run of say 4.2 million for 2017 with 1.2 for escapement leaving 3 million for harvest divided by 740,272 residents equals 4 Sockeye Salmon per person. The harvest limits of 25 per head of household cannot apply to every resident in South Central. You will have to apply reduced limits to each stream during July 1st to August 1st.
- c. We have Southeast Alaska, PWS, Cook Inlet, Kodiak, Alaska Peninsula, Aleutian Islands, Bristol Bay, Kuskokwim and Yukon River. Where every river has an abundance of salmon over the escapement levels required to bring back an SEG. Common use if applied fairly would require everyone to travel and get their appropriate amount of fish and every species from each river. It's a want of Sockeye salmon not a need for food. This attitude has created hatred for the public that participates in the Commercial fisheries. This needs to STOP!
- d. Limited Entry for the fisheries which are a limited resource has replaced Common use is our constitution. Limited Entry is how the public participates in common use. It encourages conservation and the ability to manage for the maximum benefit to all Alaska Residents. With a Tax for the communities and the State. While still leaving a reasonable room for Sport and Personal use. Unless you as board members stop and think this through harm will be caused to the resource and the Public. Limited Entry does not give exclusive rights to fish. Permits can be purchased by the public for all of the areas of Alaska, it is just limited.



- e. The Oil Industry where we have leased out our resources, we have given up our individual common use and replaced it with us all sharing in taxes from the lease and from a Permanent Fund Dividend, we cannot go to Fairbanks and tap into the Alyeska Pipe line for personal use oil consumption while we have the leases; you would be arrested.
- f. Mining the state gives leases and claims with a Tax for the public as a trade for common use is the public's ability to apply for a claim. Those claims once given are theirs to work, if we were to go and personal use on those claims we would be arrested.

Limited Entry, qualifications, optimum number in each fishery, Alaska Resident held compared to out of State residents.

- a. Limited entry was put in place to bring stability and to not cause economic hardship to the fishers, and for the Area Biologists to have the ability to control the harvest and max out the MSY in our Alaska Constitution.
- b. The qualifications are in line with a Tier 11 system for Game. **What are the point systems based upon?***

The basic criteria used to evaluate hardship

Are: (1) Economic dependence upon the fishery,
Which may include percentage of income from
The fishery and investment in a vessel and gear,
And (2) Past participation in the fishery, which
may include the number of years and
Consistency of participation.

- c. The optimum number keeps permits available to the public, I am against one person fishing two permits, and limiting the public's ability to purchase permits and participate. I am for two permits on one boat to help the younger people to enter the fisheries and save up for a vessel.
- d. Alaska Residency Especially on the Kenai Peninsula. Out of the Drift fleet of over 500 permits; 80% 411 permits are held by Alaskan's with most of them local to the area. Out of the Set Net permits of over 700; 83% or 600 plus are Alaskan residents and most of them local to the area and community. We do not have record of the residents who are Alaska Native; I have at least 5 friends that are Alaska Native that fish in UCI. There are no data as to how many are Alaska Native. My wife is also Alaska Native and a permit holder, our Children are Alaska Native and fish with us, and will eventually hold the permits and fish. Only Western Alaska has a greater level of participation.
- e. Creating stability will add value to the Permits, and Vessels and give income for vessel repair, and upgrading lifesaving equipment; such as Life Rafts which have an exemption from the USCG. Financial restraints for income have led to these



compromises of safety and equipment care. It will also help in the Aging of the Fleet for our children and youth getting involved in the fisheries.

- f. Displacement of commercial fishers from the UCI fisheries with residents from the major cities because of their so called right needs to be corrected with law and order. That thinking is the same as what has displaced Alaska Natives from preference to game, fish and land. Let that preference to Commercial Fishing Permits be removed if you restore an Alaska Native preference to fish and game, and open up another homestead act for all Alaska Natives.

Call the Local Area Biologist and talk with them in each area before you travel there. (907) 262-9368

I encourage you to call the Local area biologists as you travel the state.

One issue that should be addressed is the range of escapements; which should vary from 700,000 to 1,200,000 in a cycle. Your current suggestions for small escapements on small runs and large escapements on large runs are disrupting to biological diversity and river and lake management. If you have large runs like we have been having you put large escapements in the river which now have been in excess of 6 years in a row. Please stop this and follow the recommendations of the Area Biologists.

I would like to challenge all future Chair leaders on the BOF to exclude their vote on political and personal voting and defer it to the Local Area Biologists. If the Area Manager for the State stays out of allocation issues so should the Chair. The BOF is political appointed and the fisheries needs to stay managed on science. The Chair will set the attitude and professional standard that needs to be set by seeking the advice from the local area.

Conservation Theory requires for everything to line up and to be in order and follow law. Please read the laws that are in place.

I will miss the opening for testimony at the upcoming BOF meetings for Upper Cook Inlet but will be there when you deliberate. I look forward to talking with you also. I have communicated with Israel Payton and appreciate Robert Ruffners email address being available. I specifically enjoyed Israel's visit to the Kenai Peninsula and talking with all user groups. He asked me for my perspective on what is happening.

I hope I have given you my views on the Law and History and practicality and what is best for all of our residence.

David Hillstrand



From: [Haight, Glenn E \(DFG\)](#)
To: [Haight, Glenn E \(DFG\)](#)
Subject: FW: Upper Cook Inlet Proposals
Date: Monday, November 21, 2016 4:23:46 PM

Donald Johnson

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#87--- Amend Central District Drift Gillnet Fishery Management Plan to maximize commercial harvest of sockeye salmon, as follows: The Central District Drift Gillnet Plan desires to maximize the killing and selling of fish attempting to migrate up Cook Inlet. The plan should desire to maximize adequate escapement of salmon into our freshwater rivers and streams. Maximizing a commercial harvest is not the correct way to write a fisheries management plan. This plan should be changed to maximize freshwater escapement of salmon. Directing management to **(minimize the commercial harvest of Northern District and Kenai River Coho while providing sport reasonable opportunity)** is a backwards and crazy way to attempt to manage fish. It would be like trying to control crime by encouraging police to hit everyone they meet up side the head while minimizing the number of people they send to the hospital! It is not reasonable to direct management to minimize the harvest of any fish that swim along-side each other when using commercial gill nets. With gillnets you cannot maximize the commercial harvest of fish swimming beside sport fish allocated Kenai River Coho, and still providing anglers a reasonable opportunity to harvest. The current Central District Plan is an exercise in "**double talk**" because it desires to catch all the salmon while allowing all the salmon to also escape! I say the BOF should amend the plan to get the commercial drift net fleet off all the stocks that the plan looks to offer a reasonable opportunity to sport fishermen. This plan is looking to do the impossible by trying to do fisheries brain surgery with a fisheries baseball bat. **I reject proposal 87 because the current plan should be thrown out and a new one created which actually stands a chance of minimizing the accidental killing of kings and silvers.**

#88--- Remove restrictions to the commercial drift gillnet fishery, so that the fishery would occur during two inlet-wide fishing periods based on test fishery and escapement data.

I reject proposal 88 because we have no way of knowing the king salmon impact from this kind of an expanded drift gillnet fisheries.

#89--- Repeal and readopt Central District Drift Gillnet Fishery Management Plan with the amended plan removing mandatory time and area restrictions



from July 1–August 15.

I reject proposal 89 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#90--- Remove restrictions on the commercial drift gillnet fishery from July 1–31 and manage the drift gillnet fishery based on in season salmon abundance

I reject proposal 90 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#91--- Remove area restrictions imposed on the commercial drift gillnet fishery during July 9–15 and 16– 31 time period.

I reject proposal 89 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#92--- Restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15.

I feel it is important to get as many Coho Salmon to the rivers of Upper Cook Inlet as possible.

I support proposal 92 because it would allow more coho salmon to reach their native rivers and streams.

#93--- Amend preamble of management plan and restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1-15.

While I do support getting more Coho Salmon to the northern district streams, I do not support it at the detriment of returning Coho to the Kenai and Kasilof rivers.

I REJECT PROPOSAL 93.

#94--- Remove the one-percent rule, as referenced to both the set and drift gillnet fisheries, from the Drift Gillnet Management Plan.

I feel the 1% rule has worked very well in getting Kenai River returning King Salmon into the river and should not be changed.

I REJECT PROPOSAL 94.

#95--- Restrict commercial drift gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1–15.

The Kenai and Kasilof coho and king stocks are depleted enough, there is no reason to allow the drift fleet to deplete them even more.

I REJECT PROPOSAL 95

#96--- Allow commercial fishing with drift gillnets in all waters of the Central District, except the Kenai and Kasilof Sections, from August 16 until closed by emergency order.

I REJECT 96 and the only way I would support it is IF the increased amount of drift gillnet time were subtracted from the set gillnet time in the Central District.

#97--- Repeal the drift and set gillnet one-percent rules that apply to from



August 1–15.

I reject and disagree with proposal 97 because it is completely illogical attempting to abandon the gillnet 1% rule from Aug. 1-15. This kind of change would only insure that what remains of our Kenai & Kasilof silver stocks would be devastated while comm. fish chases after every last remaining sockeye salmon.

#98--- Reduce sport fishery bag limit for Coho salmon on the west side of Cook Inlet and close drift gillnet fishing in Areas 3 and 4 for remainder of season if Coho salmon sport fishing is restricted or closed in the Little Susitna River.

I support proposal 98 attempting to close down comm. fishing when sport fishing is closed down in the Little Susitna.

#99--- Amend management plan to remove all restrictions and manage the commercial set gillnet fishery to harvest surplus Kasilof River sockeye salmon. This proposal would devastate the numbers of returning Kenai and Kasilof King Salmon and is not viable.

I do not support proposal 99 because it would only serve to increase the accidental killing of even more Kenai and Kasilof King Salmon when our kings are already extremely depleted.

#100--- Open the commercial set gillnet fishery in the Kasilof Section as early as June 20 if the department estimates 50,000 sockeye salmon will be in the Kasilof River before June 25.

I reject proposal 100 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#101--- Allow commercial fishing with set gillnets within 600 feet of shore in the Kasilof Section, with fishing time occurring 600 feet or less offshore not subject to the hourly restrictions in the Kenai River Late-Run Sockeye Salmon Management Plan.

I reject proposal 101 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#102--- Amend management plan to allow commercial fishing with set gillnet gear in the Kasilof Section within one-half mile of shore and eliminate the provision allowing commercial fishing with set gillnet gear only within 600 feet of shore in the Kasilof Section.

This proposal is much like the previous one, #101. Increasing the fishing area for set gillnets from 600 to one-half mile off shore would kill a great many more king salmon. I reject proposal 102 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#103--- Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 and adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7.

This proposal would aid in returning numbers of King Salmon to the Kasilof and Kenai Rivers. That would be a good thing.



I support proposal 103 because it would increase the number of king salmon being able to reach their native rivers and streams.

#104--- Reduce the closed fishing period or “window” and increase additional fishing time with set gillnet gear in the Kasilof Section prior to July 9.

I reject proposal 104 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#105--- Allow commercial fishing with set gillnet gear in the North Kalifonsky Beach statistical area (NKB - stat area 244-32) when the upper end of the Kasilof sockeye salmon escapement goal range is projected to be exceeded.

This proposal would increase Comm Fish Set Net opportunity to the detriment of Kenai River King Salmon numbers entering the Kenai River.

I reject proposal 105 because it would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#106--- Replace the optimum escapement goal with the sustainable escapement goal for Kasilof River sockeye salmon.

I reject proposal 106 because it would reduce Kasilof sockeye escapement goal. The Kasilof sockeye escapement should be increased NOT decreased. The Kasilof sockeye escapement goal should be increased UNLESS an increase results in additional comm. sockeye fishing time off the Kasilof River.

#107--- Replace the optimum escapement goal with a sustainable escapement goal for Kasilof River sockeye salmon.

Same as #106. I reject proposal 107 because it would reduce Kasilof sockeye escapement goal. The Kasilof sockeye escapement should be increased NOT decreased. The Kasilof sockeye escapement goal should be increased UNLESS an increase results in additional comm. sockeye fishing time off the Kasilof River.

#108--- Replace the optimum escapement goal with the current biological escapement goal for Kasilof River sockeye salmon.

Again this is the same as #106. I reject proposal 108 because it would reduce Kasilof sockeye escapement goal. The Kasilof sockeye escapement should be increased NOT decreased. The Kasilof sockeye escapement goal should be increased UNLESS an increase results in additional comm. sockeye fishing time off the Kasilof River.

#109--- Provide clarification on the use of gear in the Kasilof River Special Harvest Area (KRSHA) for individuals who hold two Cook Inlet set gillnet Commercial Fisheries Entry Commission (CFEC) limited entry permits.

This proposal sounds reasonable.

I SUPPORT PROPOSAL 109

#110--- Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one gillnet per limited entry permit held.



I SUPPORT PROPOSAL 110

#111--- Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one set gillnet per limited entry permit held.

I SUPPORT PROPOSAL 111

#112--- Allow holders of two Commercial Fisheries Entry Commission set gillnet limited entry permits to fish two set gillnets in the Kasilof River Special Harvest Area.

I **reject** proposal 112 because the use of two gillnets fishing the Kasilof Special Harvest Area increases the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#113--- Remove restrictions on the amount of drift or set gillnet gear a vessel may have on board within the Kasilof River Special Harvest Area.

I **reject** proposal 113 allowing vessels to carry extra nets onboard because it only encourages the illegal use of excess gear in the water. Excess gear only increases the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#114--- Require all nets, buoys, ropes and anchoring devices to be removed from the Kasilof River Special Harvest Area when this area is closed to commercial fishing.

I **agree** with proposal 114 because it would help reduce the mass of garbage fishing gear in our public waters and also help increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#115--- Define the boundary that separates set gillnet from drift gillnet gear in the Kasilof River Special Harvest Area (KRSOA), and define the outside boundaries of the KRSOA.

I **support** proposal 115 because it would help reduce conflicts between gear types. Gear conflicts only work to increase the waste of fish.

#116--- Review the optimum escapement goal (OEG) and in river goals for Kenai River late-run sockeye salmon.

I **reject** proposal 116 because removing the in river escapement goals from the Upper Cook Inlet Salmon Management Plans may simplify things but it would also further assist our ADF&G in forgetting that they are managing to get fish into rivers and streams, not just Cook Inlet. Removing in river goals would only help increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers. These escapement goals are meaningless when the ADF&G counts Kenai pink salmon as if they are Kenai sockeye salmon. The ADF&G needs "get honest" and confirm their sonar counts with their fish wheel and stop pretending that pink salmon are sockeye salmon.

#117--- Amend the Kenai River Late-Run Sockeye Salmon Management Plan to



remove the optimum escapement goal for Kenai River late-run sockeye salmon.

I reject 117 because our ADF&G may be mis-counting our salmon on the Kenai River, but dumping the late run sockeye plan optimum goal would just make that problem worse.

#118--- Remove the optimum escapement goal for Kenai River late-run sockeye salmon and add the guided sport fishery to the list of fisheries managed under the plan.

I reject 118 because our ADF&G may be mis-counting our salmon on the Kenai River, but dumping the late run sockeye plan optimum goal would just make that problem worse.

#119--- Amend management plan to achieve in river goal range of 850,000–1,050,000 late-run sockeye salmon at run strengths less than 2.3 million sockeye salmon and 950,000–1,150,000 late-run sockeye salmon at run strengths greater than 2.3 million sockeye salmon.

All this proposal does is muddy up the current management escapement goal.

I reject 119 because it only attempts to confuse our current sockeye escapement on the Kenai River.

#120--- Decrease the in river goal ranges for late-run Kenai River sockeye salmon by 100,000 fish and limit the bag and possession of sockeye salmon to three per day and three in possession in the Kenai River sport fishery.

I reject 120 because it is just attempting to reallocate sockeye from sport fish to commercial fish.

#121--- Repeal and readopt management plan to remove the optimum escapement goal, mandatory restrictions and closed fishing periods or “windows”, and specify that management will be based on the abundance of late-run Kenai River sockeye salmon.

I reject proposal 121 because the removal of optimum goals and closed comm. fishing periods would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#122--- Remove mandatory closed fishing periods or "windows" from the Upper Sub district commercial set gillnet fishery.

Both of these proposals are basically the same and are greed driven by Comm Fish Set Netters. We need Escapement Goals to ensure the survival of our salmon species and we need Comm Fish closure "windows" to ensure that Kenai River bound King Salmon make it into the river. Only common sense!

I reject proposal 122 because the removal of optimum goals and closed comm. fishing periods would increase the accidental commercial killing of even more king salmon from the Kenai & Kasilof Rivers.

#123--- Repeal and readopt the management plan to allow for the commercial harvest of surplus pink salmon in the Upper Sub district with set and drift gillnet gear.



I reject proposal 123 because increasing the comm. catch of pinks would increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#124--- Amend the Cook Inlet Pink Salmon Management Plan to remove or lower the daily harvest triggers.

I reject proposal 124 because the removal of the lower triggers would increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#125--- Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery.

I reject proposal 125 because the removal of the mesh size restriction would increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#126--- Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery.

I reject proposal 126 because the removal of the mesh size restriction would increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#127--- Remove in river goals from the list of escapement goals in the Upper Cook Inlet Salmon Management Plan and realign in river and escapement goals in the Kenai River Late-Run Sockeye Salmon Management Plan.

I reject proposal 127 because removing the in river escapement goals from the Upper Cook Inlet Salmon Management Plans may simplify things but it would also further assist our ADF&G in forgetting that they are managing to get fish into rivers and streams, not just Cook Inlet. Removing in river goals would only help increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#128--- Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan.

I reject proposal 128 because maximizing the kill of Cook Inlet salmon also maximizes the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#129--- Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan.

I reject proposal 129 because it is a reallocation of fish from sport fish to commercial fish. It also increases the killing of Cook Inlet salmon while maximizing the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#130--- Amend Upper Cook Inlet Salmon Management Plan so that fishery



restrictions on fully allocated stocks of concern are shared among all user groups in proportion to the respective user group harvest of that stock.

I support 130 if it places the fisheries restrictions and enforcement where most of the fish are caught.

#131--- Define commercial fishing statistical areas in the Upper Sub district set gillnet fishery.

#132--- Move the southwestern-most point of the Expanded Kasilof Section 1.2 nm west so it aligns with the northwestern-most point of the Expanded Anchor Point Section.

#133--- Allow a single person holding two Commercial Fisheries Entry Commission Cook Inlet drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear.

I reject proposal 131-133 because they all work to increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#134--- Remove restrictions in the Upper Sub district commercial set gillnet fishery and allow for regular weekly fishing periods through July 20 with additional fishing periods based on in season abundance.

I reject proposal 134 because it works to increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#135--- Redefine sections and manage the commercial set gillnet fishery in the Upper Sub district with three sections with staggered opening dates.

This proposal will lead to confusion and much extra effort by all involved.

I reject proposal 135 because it makes commercial fishing even more difficult to enforce therefore increasing the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#136--- Allow commercial fishing with set gillnets in the North Kalifornsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8.

I reject proposal 136 because attempts to increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#137--- Remove “one-percent rule”, where the commercial set gillnet fishery will close after July 31, if less than one percent of the season’s total sockeye is harvested in two consecutive fishing periods.

#138--- Remove the one-percent rule that applies to the commercial set gillnet fishery in the Upper Sub district after July 31 so that the set gillnet fishery will close August 15 and be managed using regular fishing periods from August 11 through August 15.

#139--- Repeal the one-percent rule, as it applies to the Upper Sub district set gillnet fishery so that the set gillnet fishery will close August 15.

I reject proposal 137-139 because the 1% is the only thing preventing the ADF&G and commercial fishing from accidentally killing all of our kings and silvers.



#140--- Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth.

I reject proposal 140 because increased mesh depth will only increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#141--- Limit the depth of all set gillnet gear in Upper Subdistrict of the Central District to no more than 29 meshes deep.

I support proposal 141 because it might save a few of our kings from being accidentally commercial killed.

#142--- Close waters within one statute mile of the terminus of Kustatan, Drift, and Big rivers, and Bachatna Creek; as measured from mean lower low water, to commercial fishing.

I support proposal 142 because it might save a few of our kings from being accidentally commercial killed.

#143--- Increase the amount of smelt that may be taken in the Cook Inlet commercial smelt fishery from 100 tons to 200 tons annually.

I reject proposal 143 because the increased killing of our smelt will only help reduce the prey available for our king and silver salmon which are already starving to death because of excess commercial fishing.

#144--- Require that when proxy fishing in Upper Cook Inlet, once a bag limit is taken the next legal bag limit must be retained.

I SUPPORT PROPOSAL 144

#145--- Allow only barbless hooks in Upper Cook Inlet flowing waters closed to salmon fishing.

I SUPPORT PROPOSAL 145

#146--- Require the use of circle hooks when fishing for sockeye salmon.

I reject proposal 146 because it is crazy and prevent all sportfish from catching sockeye salmon.

#147--- Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery.

#150--- Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention.

I reject proposal 147-150 because locking the early run king fishery into these restrictions would tie the ADF&G's hands when king runs rebound.

#148--- Rewrite the Kenai River and Kasilof River Early-run King Salmon Management Plan to redefine early-run stocks and establish age- and sex-based escapement goal.



I reject proposal 148 because managing river escapements for sex and age is an attempt to micro-manage minor freshwater issues while ignoring major saltwater issues.

#149--- Revise Kenai River and Kasilof River Early-run King Salmon Management Plan.

I support 149 because if these plans are revised along with an effort to revise our saltwater management plans, which happen to be starving our salmon to death.

#151--- Repeal barbless hook provisions in Lower Kenai River.

I support 151 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#152--- Expand the dates to prohibit back trolling and tie to prohibition of bait.

I reject 152 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#153--- . Prohibit fishing for king salmon from markers 300 yards below Slikok Creek upstream to Skilak Lake.

I reject 153 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#154--- Expand the waters of the Kenai River closed to fishing for king salmon.

#155--- Expand the waters of the Kenai River closed to fishing for king salmon.

I reject 154-155 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#156--- Replace slot limit for Kenai River king salmon with maximum size limit to prohibit retention of king salmon greater than 42 inches in length.

Current slot limit regulations work great. Have not been able to fish for King Salmon in the Kenai River for 3yrs in May and 2 1/2yrs in June so it is redundant.

I reject 156 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#157--- Modify the annual limit of king salmon from the Kenai River to two fish, only one taken prior to July 1.

I reject 157 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#158--- Modify the annual limit of two king salmon for the Kenai River to include only one large fish.

#166--- Modify season dates and area for Kenai River late-run king salmon management. July 8 – July 31: 1 per day, 1 in possession

I reject 154-155 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#159--- Extend the time that the slot limit for Kenai River king salmon is in



effect.

I reject 159 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#160--- Prohibit the use of bait in the late-run Kenai river king salmon fishery until escapement goals have been met.

#163--- Prohibit bait on runs less than 22,000 and eliminate 12-hour fishing period restriction.

I reject 160-163 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#161--- Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention.

According to current management plan, this would also close the Comm Fish Set Nets.

I reject proposal 161 because locking the early run king fishery into these restrictions would tie the ADF&G's hands when king runs rebound.

#162--- Establish an Optimum Escapement Goal (OEG) of 15,000 – 40,000.

I support 162 because we should be increasing king goals not reducing them.

#164--- Repeals and readopts the Kenai River Late-Run King Salmon Management Plan.

#165--- Decrease the trigger for management actions on Kenai River late-run king salmon from 22,500 to 16,500.

I reject 164-165 because reducing the triggers would only further tie the ADF&G's hands when king runs rebound.

#167--- Close the Kenai River personal use fishery when the late-run king salmon sport fishery is closed.

I reject 167 because personal use has a higher priority than sport fish use.

#168--- Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery in July and August.

#169--- Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery in July and August

I reject 168- 169 because they are excessively vague and therefore meaningless. Remove what restrictions?

#170--- Reconsider “paired” restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery.

#171--- Remove the commercial set gillnet fishery in the Kasilof Section from “paired” restrictions in the Kenai River Late-Run King Salmon Management Plan.

#172--- Remove “paired” restrictions in the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery.

#173--- Decrease the projected in river run goal of late-run king salmon to 19,000 fish and remove the Upper Sub district commercial set gillnet fishery



from “paired” restrictions.

#174--- Remove provisions (e)(3)(A)(i) and (ii) that restrict the number and/or depth of commercial set gillnets fished by a Commercial Fisheries Entry Commission limited entry permit holder in the Upper Sub district if the use of bait is prohibited in the Kenai River sport fishery.

#175--- Clarify the length and depth of set gillnets that may be used in the Upper Sub district commercial salmon fishery, if the use of bait is prohibited in the Kenai River sport fishery.

#176--- Allow commercial set gillnet fishing periods in the Kenai and Kasilof sections to be managed separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery.

#177--- Allow commercial fishing periods in the Kasilof and Kenai/East Forelands sections to be opened separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery.

I reject proposal 170-181 because they attempt to increase the accidental commercial killing of even more king and silver salmon from the Kenai & Kasilof Rivers.

#180--- Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15.

I reject 180 because excessive freshwater regulation has already resulted when our salmon resource problems are in the saltwater.

#182--- Prohibit all guiding from 6 p.m. to 6 a.m., as follows: Local residents and unguided non-guided anglers would then have a fair chance to access the sockeye salmon fishery before 6:00 a.m. or after 6:00 p.m.

#185--- Modify language referencing fishing from guide boats on the Kenai River to include all guided fishing.

I reject 182 because excessive freshwater regulation has already resulted when our salmon resource problems are in the saltwater.

#183--- Allow guided anglers to fish from a guide boat on the Kenai River on Mondays in August.

At that time of year there are still many tourists in Alaska and on the Kenai Peninsula. They bring much needed money to our cities and communities, why not let them fish on Mondays in August too?

#184--- Relax guiding restrictions when king salmon fishing is closed by emergency order.

I support 183-184 because excessive freshwater regulation has already resulted when our salmon resource problems are in the saltwater.

#186--- Only barbless hooks allowed in the Kenai River upstream of the Lower Killey River.

I support 186.

#187--- Allow only barbless, unbaited, single-hook gear on the Kenai River from January 1 – August 1.



#188--- Allow only one single-hook or one single-hook lure.

I DO NOT support 187-188 because excessive freshwater regulation has already resulted when our salmon resource problems are in the saltwater.

#189--- Allow fishing from shore after harvesting a bag limit of Coho salmon.

#190--- Expand the waters open to fishing after harvesting a bag limit of Coho salmon in the lower Kenai River.

#191--- Kenai River Coho salmon bag limit from two fish to three.

I support 189-191 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#192--- Shorten the Kenai River Coho season by closing October 31.

Having read all four of these proposals I feel that I agree with them and that they would not place to great a harvest issue upon these fish.

I reject 192 because excessive freshwater regulation has resulted when our salmon resource problems are in the saltwater.

#193--- Create an archery fishery for sockeye salmon in a section of the Russian River.

I reject 193 because there isn't a compelling reason for the change.

#194--- Create a size limit for lake trout in Hidden Lake, as follows: In Hidden Lake, the bag and possession limit for lake trout is one fish under 16 inches of length. **I reject 194 because there isn't a compelling reason for the change**

#195--- Remove the commissioner's emergency order authority to extend the Kenai River personal use fishery hour.

#196--- Prohibit dip nets from being attached to a vessel, as follows: Dip nets operated from a boat may not in any way be physically attached to the boat. They must be operated by hand.

#197--- Prohibit dip netting from a vessel that is not anchored in the Kenai and Kasilof river personal use fisheries, as follows:

In the Kenai and Kasilof Rivers boats carrying personal use dip netters must be anchored.

#198--- Prohibit webbing in personal use dip nets that exceeds 2.5 inch stretched measure.

#199--- Prohibit dip netting on the Kasilof River from a vessel with a motor on board greater than 10 horsepower.

I DO NOT support 195-199 because they attempt to reallocate fish from sport fish to the commercial fishing use.

#200--- Amend the number of king salmon that may be retained in the Upper Cook Inlet personal use fishery to 10 king salmon under 20 inches.

I DO NOT SUPPORT 200. I reject 200 because it is a reallocation of fish while ignoring the reason for the smaller king salmon. Our king salmon are starving at sea and this proposal attempt to sweep these starving king under-the-rug.



#201--- Amend the area open to dip netting from shore in the Kenai River personal use dip net fishery.

I support 201

#202--- Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August.

#203--- Extend season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon.

#204--- Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park.

I support 202-204

#205--- Allow shore-based personal use dip netting in the Kenai River upstream to Skilak Lake.

I reject 205 because it will result in a reallocation of fisheries.

#206--- Create an area upstream of the Kenai River personal use fishery where recording and fin clip requirements are waived for fish that have not been off loaded. **I support 206**

#207--- Amend the boundary description language for the area open to dip netting in the Kasilof River personal use salmon fishery.

I SUPPORT PROPOSAL 207.

#208--- Allow 10 Dolly Varden/Arctic char per household in Cook Inlet Personal Use Fisheries.

I DO NOT AGREE WITH OR SUPPORT PROPOSAL 208.

Thank you for reviewing my testimony regarding these Upper Cook Inlet Proposals.

Donald Johnson

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To the Members of the Board of Fish (2017),

The enclosed leaflet, King Salmon In The Kenai - Numbers to Consider, is a consolidation of ADF&G numbers from annual reports and research papers.

These numbers tell the story of how after 3 eight year cycles, we have an almost complete collapse of the early king run and appear to be moving rapidly that way with the late run too.

To arrive at these dismal numbers we have ignored the following:

1. CARRYING CAPACITY

471,274 angler days were fished in the Kenai & Russian Rivers in 2013.

137,963 of those angler days were below the bridge.

The Kenai Watershed Forum recorded at peak, 700 outboard motor boats were operating simultaneously below Skilak Lake (2008-2010).

90% of early run was caught in 1988.

2. FISHING IN SPAWNING GROUNDS

The Kenai River is one of the very few rivers where this is allowed to happen.

3. THE REAL RESULTS OF HOOK & RELEASE

The ADF&G studies show that 5-10% of chinook caught and released die within the first 5 days, 16-18% out-migrated, but only 40% spawned. And it get worse.

Fish entering the river are on an energy budget, are no longer feeding, and spend an average of 32 days making the metabolic changes necessary for spawning. They use 57% more energy in fresh water than they do for ocean migration. They are completely exhausted each time they are dragged to the boat.

Of the 40% that spawned, were they able to dig nests deep enough? What is the survival rate of the spawn?

4. FISHERY INDUCED GENETIC SELECTION (Trophy Fishing)

The results are:

1. The returning fish are smaller in size as we see with the loss of 6 & 7 ocean fish.
2. The returning fish are younger, hence the increase in number of 1 & 2 ocean fish (Jacks).

All of these have occurred.

I will be spending my two minutes before the Board talking about Hook & Release. If the opportunity arises I would be glad to spend whatever time available on any of the other numbers.

Thanks for giving these numbers some consideration.

Erik Barnes

Erik Barnes

Exposure and stress. Motoring over and past spawning grounds and concentrated fishing pressure at "fishing holes" causes stress.

Long staging times averaging 33 days (up to 67)^{49 50} in the Kenai River mainstem adds exposure to Kenai River mainstem and tributary-spawning Kings.

From 2008-2010, the Kenai Watershed Forum recorded at peak more than 700 outboard motor boats running the Kenai River below Skilak Lake simultaneously.⁵¹

EAST SIDE SETNET EFFECT

Early-run. The Kenai-East Forelands section (Kenai River area and north) of Eastside Setnetters has not fished the early-run at all in 30 years (1985).⁵² Their season doesn't start until July 8 at the earliest.⁵³

On years when Kasilof sockeye are running abundantly and early, the Kasilof section of the Eastside Setnet area sometimes will have fishing opportunity during last ten days of June.⁵⁴ ADF&G describes their catch of returning early-run Kings as "insignificant."⁵⁵

Genetic stock identification of Kenai tributary-bound Kings harvested by all Eastside Setnetters combined averaged .004 over the entire 2010-2013 seasons.⁵⁶

Eastside Setnetters objectively are neither the cause or nor a contributing factor to the decline of the early-run King fishery.

On any year, the only significant harvests of the early-run Kenai Kings are by in-river sportfishmen.

Late-run. In 2013, all of the East Side Setnetters' late-run King harvest contributed .5% (½ percent) to the value of their sockeye salmon fishing harvest.⁵⁷

Of the total King harvest by Eastside Setnet fishermen, 31.3% were bound for river systems other than the Kenai River according to a four-year genetic stock identification study.^{58 59}

According to an ADF&G genetic stock identification study, in 2013, Eastside Setnetters' catch of late-run Kenai Kings 5-years-old and older (large enough to be counted by the Didson counter in-river⁶⁰) was 3.5% of the total run.⁶¹

The Eastside Setnetter's catch of jack 3- and 4-year-old Kings was 6.9% of the total late-run.⁶²

The sportfish daily limit on jack Kings less than 20 inches long (3 year-olds) is 10 per day.⁶³

Adding 3.5% + 6.9%, Eastside Setnetters caught 10.4% of the late-run Kenai Kings in 2013.

KING SALMON IN THE KENAI *Numbers to Consider*



<u>LATE RUN KINGS</u>	<u>1987</u>	<u>2013</u>
In-river run strength	63,550 ¹	17,015 ²
Average size	34 lb ³	15 lbs ⁴
Escapement	50,327 ⁵	15,395 ⁶
Jacks: (3 & 4 yr-olds)	9% ⁷	66% ⁸
Males % of total run	49% ⁹	88%* ¹⁰

* Setnet index

Late-run Kings arrive to the Kenai River after June 30.¹¹

There were 471,274 angler days fished in the Kenai and Russian Rivers in 2013.¹² The Kenai River downstream of the Soldotna Bridge (river mile 21) is the most heavily fished part of the Kenai River by an order of magnitude.¹³

More late-run Kings spawn below the Soldotna Bridge than in any other section.¹⁴

<u>EARLY RUN KINGS</u>	<u>1987</u>	<u>2013</u>
In-river run strength	25,643 ¹⁵	2,038 ¹⁶
Escapement	12,362 ¹⁷	2,033* ¹⁸

*Did not make the minimum optimum escapement goal of 5,300.¹⁹

ADF&G early run Kenai Kings are counted from May 15 to June 30.²⁰

On average mainstem and tributary spawners mill in-river for 33 days, with a range up to 67 days.^{21, 22}

The Bendock catch-and-release mortality study estimated 70% of early-run Kings were available to in-river, sportfish harvest in July.²³

A 2010-2013 tagging study showed that as late as July 31, more than 30% of tagged fish detected in open-to-fishing waters above Slikok Creek on the Kenai River were early-run, mainstem spawners.²⁴



Over 90% of the early-run King return to the Kenai River was caught by sportfishermen in 1988. 5,946 (73% of escapement) of those were caught-and-released.²⁵

PRODUCTIVITY

Each run is composed of Kings of mixed parent (brood) years from 2 to 8 years earlier.

Jacks may be defined as young, sexually mature 3 or 4 year-old males that return to spawn earlier than the females of their brood year.²⁶ In a 1984 study, 4-year-old early-run Kenai Kings were 27 inches in length and smaller, averaging 22 inches in total length.²⁷

Kings have narrow-sense (strongly inherited) heredity traits including 1) age-at-maturity and 2) size-at-age.²⁸

Older, larger female Kings are more productive and may produce more than 4 times more eggs than smaller, younger Kings.^{29 30} e.g., 4,200 versus 17,200 eggs.²⁹

In 1988, ADF&G estimated an early-run return of 57 8 year-old Kenai Kings, 2,279 7 year-olds, and 15,077 6 year-olds.³¹

The nest of a large female King may be as deep as 2.5 feet and larger than 150 square feet.³²

Because age-at-maturity is strongly inherited, in general, young jacks return more jacks.³³ Larger, older Kings at maturity beget larger, older Kings at maturity.^{34 35}

Changing fish population structure to younger, smaller fish can lead to decreased reproductive potential, lower reproductive rates, loss of yield, increased variability in abundance, and fishery collapse.³⁶

The energy budget required for metabolic changes necessary for living in fresh water, migration, and spawning for Kings is visibly observable in changes in color and teeth during this phase.

CONTRIBUTING CAUSES OF DECLINE

Overfishing and targeting the largest, most productive trophy Kings. Targeting large Kings is a key to "fisheries induced genetic selection" for younger, smaller, less productive returns.³⁷

ADF&G Sportfish Division continues to sponsor a trophy (more than 55 inches total length), catch-and-keep King fishing contest³⁸ even when other conservation measures are being taken, e.g., July 2013.³⁹

ADF&G Sportfish Division endorses a hook-and-release policy" (42-55 inches) that invites more hook-and-release mortality even on years like 2013 when early-run minimum thresholds had not been reached.^{38 39}

The slot limit policy combined with the trophy fishing contest encourages hook-and-keep retention of all the Kenai River's largest, most productive Kings (more than 55 inches long).

Hook-and-release 5-day mortality. In 1989, ADF&G estimated average **5-day** mortality for once-caught-and-released Kings at 10.6%.⁴⁰

Although an average of 10.6% of the hooked-and-released Kings died within 5 days in the 1989 study, only 40% of Kings caught, tagged, and released actually spawned.⁴¹

Over three years of continued study, the 1989-91 average early-run caught-and-release 5-day mortality was measured at 7.6%.⁴²

ADF&G currently assumes a 6.4% catch-and release mortality rate, averaging only the 1990-91 studies.⁴³

Out-migration. In 1989, in addition to 10.6% 5-day mortality, another 16% out-migrated the Kenai River after catch-and-release, returning to the ocean where they were caught or otherwise disappeared.⁴⁴

A late-run 2010 tagging study resulted in 18% "drop-outs" or Kings that out-migrated the Kenai River after handling.⁴⁵

Effective hook-and-release mortality. Adding out-migration following catch-and-release to 5-day mortality amounts to a 1989 "effective mortality" of only once-caught-and-released Kings of up to 27%.

Add twice-hooked-and-released mortality to "effective mortality." In the 1989 study, 57% of Kings twice-caught-and-released did not survive to spawn.⁴⁶

According to ADF&G, in the related 1990 tagging study, Kings twice-caught-and-released had half the survival rate and three times the river exodus, out-migration rate.⁴⁷

Disproportionate fishing pressure. In 2013, ADF&G observed that because the Kenai River downstream of the Soldotna Bridge is the most heavily utilized mainstem spawning area in both historical and recent ADF&G data, closures upstream of Slikok Creek have not conserved mainstem spawning Kings in proportion to abundance.⁴⁸

REFERENCES FOR KING SALMON IN THE KENAI *Numbers to Consider* v6

LATE RUN KINGS	1987	2013
In-river run strength	63,550 ¹	17,015
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Males % of run	49%	88% *

* Setnet index

Table 8.-Late-run Kenai River Chinook salmon population data, 1986-2013.

Year	Deep Creek Marine Harvest ^a	Eastside Setnet Harvest ^b	Drift Gillnet Harvest ^c	Comm & PU ^d	Kenaitze Educational Sub ^e	Sub ^f	PU Digger ^g	Sport Harvest Below Sonar ^h	In-river Run Estimated by Sonar ⁱ	Sport Harvest Above Sonar ^j	Catch-and- Release Mortality ^k	Spawning Escapement	Total Run	Harvest Rate
1986	378	13,619	1,100	ND	ND	ND	ND	ND	62,740	9,872	316	52,552	77,837	0.325
1987	731	14,536	2,731	ND	ND	ND	235	ND	63,550	13,100	123	50,327	81,783	0.365
1988	892	8,834	1,336	ND	ND	ND	0	ND	61,760	19,695	176	41,889	72,816	0.425
1989	821	7,498	0	ND	ND	22	0	ND	36,370	9,691	88	26,591	44,711	0.405
1990	963	2,843	373	91	ND	13	ND	ND	34,200	6,897	69	27,234	38,483	0.292
1991	1,023	3,361	145	150	ND	288	ND	ND	38,940	7,903	16	31,021	43,887	0.293
1992	1,269	7,363	326	50	ND	402	0	ND	42,290	7,556	234	34,500	51,700	0.333
1993	1,700	9,672	451	81	ND	27	0	ND	50,210	17,775	478	31,957	62,142	0.486
1994	1,121	10,700	276	9	1	392	ND	ND	47,440	17,837	572	29,031	59,939	0.516
1995	1,241	8,291	314	25	3	ND	712	ND	44,770	12,609	472	31,689	55,355	0.428
1996	1,223	7,944	219	31	1	ND	295	ND	42,790	8,112	337	34,341	52,503	0.346
1997	1,759	7,780	293	30	20	ND	364	ND	41,120	12,755	570	27,795	51,367	0.459
1998	1,070	3,495	199	35	2	ND	254	ND	47,110	7,515	595	39,000	52,165	0.252
1999	602	6,501	345	59	4	ND	488	1,170	43,670	12,425	682	30,563	52,839	0.422
2000	631	2,531	162	27	6	ND	410	831	47,440	14,391	499	32,550	52,038	0.374
2001	552	4,128	371	80	8	ND	638	1,336	53,610	15,144	825	37,641	60,724	0.380
2002	256	6,511	249	15	6	ND	606	1,929	56,800	10,678	665	45,457	66,372	0.315
2003	120	10,174	744	53	11	ND	1,016	823	85,110	16,120	1,803	67,187	98,052	0.315
2004	996	14,897	916	218	10	ND	792	2,386	79,690	14,988	1,019	63,683	99,905	0.363
2005	624	15,183	1,103	639	11	ND	997	2,287	77,440	15,927	1,267	60,246	98,284	0.387
2006	563	6,840	631	61	11	ND	1,034	3,322	62,270	12,490	830	48,950	74,732	0.345
2007	478	8,445	547	38	6	0	1,509	1,750	47,370	9,690	670	37,010	60,143	0.362
2008	310	5,203	392	23	15	0	1,362	1,011	42,840	10,128	370	32,342	51,156	0.366
2009	154	3,839	515	64	4	0	1,189	1,132	29,940	7,904	626	21,410	36,837	0.419
2010	335	4,567	323	32	21	0	865	445	23,250	6,762	264	16,224	29,839	0.456
2011	528	5,596	356	88	5	0	1,243	458	27,090	6,894	479	19,717	35,363	0.442
2012	30	484	115	41	0	0	40	2	27,910	101	95	27,714	28,622	0.032
2013 ^l	not avail.	2,256	267	117	8	0	11	37	17,015	1,541	79	15,395	19,711	0.219
Avg. (1986-2002)	955	7,389	523	51	6	191	308	1,317	47,930	11,997	395	35,538	57,451	0.375
Avg. (2003-2013)	414	7,044	537	125	9	0	914	1,241	47,266	9,322	682	37,262	57,513	0.335
Avg. (1986-2013)	754	7,253	528	85	8	88	586	1,261	47,669	10,946	508	36,215	57,475	0.361

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¹ Begich, R. "2010-2012 Annual Management Report and Recreational Fisheries Overview...", 2014. Fishery Management Report No. 13-51, pg 100 (run strengths)



Table 8.—Page 2 of 2.

Source: Statewide Harvest Surveys from Mills 1987-1994, Howe et al. 1995, 1996, 2001a-d, Walker et al. 2003, Jennings et al. 2004, 2006a-b, 2010a-b, 2011. In Prep. Reinberg et al. In prep. Hammarstrom and Tunmons. 2001b, Braundian and Fox 1998, Ruesch and Fox 1996, Reimer and Sigurdson 2004, Dunker and Lafferty 2007, Dunker, K.J. 2010, K. J. Dunker, Sport Fish Biologist, ADF&G, Anchorage, personal communication; Shields and Dupuis 2013b, P. Shields, Commercial Fish Biologist, ADF&G, Soldotna, personal communication; Fleischman and McKinley 2013, FMS 13-02; Tim McKinley personal communication; Robert Begich personal communication.

Note: ND = no data available.

^a From Fleischman and McKinley 2013, FMS 13-02.

^b Eastside set net and drift gillnet commercial harvest data using genetic stock allocation from Fleischman and McKinley 2013, Tony Eskelin personal communication.

^c Eastside set net and drift gillnet personal use data using genetic stock allocation from Fleischman and McKinley 2013, Tony Eskelin personal communication.

^d Total includes fish harvested from Coho, Salmatof, and Kalifornsky Beaches, and the Kenai River.

^e 1986-1994 from SWHS, 1995 (Ruesch and Fox 1996). 1996-2012 are estimates from returned permits.

^f Some harvest is below sonar and not counted against escapement.

^g Sport harvest includes Creel survey estimates for the area from Cook Inlet to the Soldotna Bridge and estimates from the SWHS for Soldotna Bridge to outlet of Skilak Lake.

^h Inriver sonar estimate estimated using a run reconstruction model from Fleischman and McKinley 2013, FMS 13-02 for 1986-2012 at river mile 8.6 sonar site.

ⁱ 2013 sonar estimate estimated based on recommendations based on Fleischman and McKinley 2013, FMS No. 13-02.

^j Harvest estimate does not include Kaslof River terminal fishery which occurred 2005-2008.

^k 2013 estimates are preliminary until biometrically reviewed and published.



LATE RUN KINGS	1987	2013
In-river run strength	63,550	17,015 ²
Average size	37 36 lb	15 lbs
Escapement	50,327	15,395
Jacks: (3 & 4 yr-olds)	9%	66%
Males % of run	49%	88% *

* Setnet index

Table 8.—Late-run Kenai River Chinook salmon population data, 1986–2013.

Year	Deep Creek Marine Harvest ^a	Eastside Setnet Harvest ^b	Drift Gillnet Harvest ^c	Comm & PU ^c	Kenaitze Educational	Sub ^d	PU Dipnet ^e	Sport Harvest Below Sonar ^{f,g}	Inriver Run Estimated by Sonar ^h	Sport Harvest Above Sonar ^{f,g}	Catch-and- Release Mortality ⁱ	Spawning Escapement	Total Run	Harvest Rate
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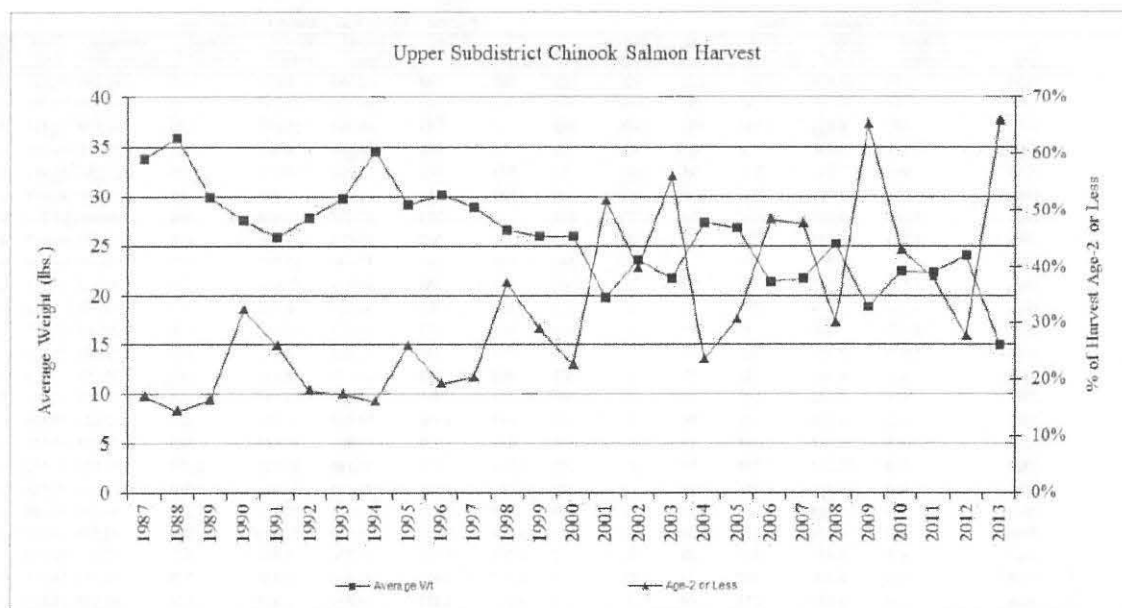


Figure 10.—Chinook salmon average weight (all fish) and percentage of the harvest comprised of ocean-age-2 or less fish in the Upper Subdistrict set gillnet commercial fishery, 1987–2013.

³ Shields, P. "Upper Cook Inlet Commercial Fisheries Annual Management Report," 2013. Fishery Management Report 13-49, pg 66 (weights)

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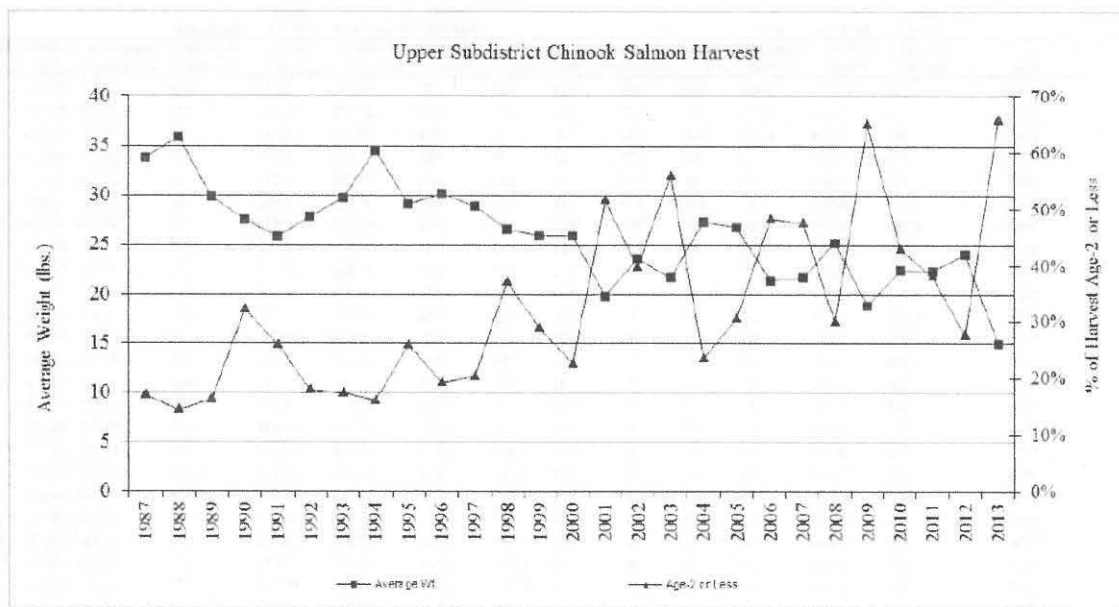


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Table 8.—Late-run Kenai River Chinook salmon population data, 1986–2013.

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1986	378	13,619	1,100	ND	ND	ND	ND	ND	62,740	9,872	316	52,552	77,837	0.325
1987	731	14,536	2,731	ND	ND	ND	235	ND	63,550	13,100	123	50,327	81,783	0.385
1988	892	8,834	1,330	ND	ND	ND	0	ND	61,760	19,695	176	41,889	72,816	0.425
1989	821	7,498	0	ND	ND	22	0	ND	36,370	9,691	88	26,591	44,711	0.405
1990	963	2,843	373	91	ND	13	ND	ND	34,200	6,897	69	27,234	38,483	0.292
1991	1,023	3,361	145	130	ND	288	ND	ND	38,940	7,903	16	31,021	43,887	0.293
1992	1,269	7,363	326	50	ND	402	0	ND	42,290	7,556	234	34,500	51,700	0.333
1993	1,700	9,672	451	81	ND	27	0	ND	50,210	17,775	478	31,957	62,142	0.486
1994	1,121	10,700	276	9	1	392	ND	ND	47,440	17,837	572	29,031	59,939	0.516
1995	1,241	8,291	314	25	3	ND	712	ND	44,770	12,609	472	31,689	55,355	0.428
1996	1,223	7,944	219	31	1	ND	295	ND	42,790	8,112	337	34,341	52,503	0.346
1997	1,759	7,780	293	30	20	ND	364	ND	41,120	12,755	570	27,795	51,367	0.459
1998	1,070	3,495	199	35	2	ND	254	ND	47,110	7,515	595	39,000	52,165	0.252
1999	602	6,501	345	59	4	ND	488	1,170	43,670	12,425	682	30,563	52,839	0.422
2000	631	2,531	162	27	6	ND	410	831	47,440	14,391	499	32,550	52,038	0.374
2001	552	4,128	371	80	8	ND	638	1,336	53,610	15,144	825	37,641	60,724	0.380
2002	256	6,511	249	15	6	ND	606	1,929	56,800	10,678	665	45,457	66,372	0.315
2003	120	10,174	744	53	11	ND	1,016	823	85,110	16,120	1,803	67,187	98,052	0.315
2004	996	14,897	916	218	10	ND	792	2,386	79,690	14,988	1,019	63,683	99,905	0.363
2005	624	15,183	1,103	639	11	ND	997	2,287	77,440	15,927	1,267	60,246	98,284	0.387
2006	563	6,840	631	61	11	ND	1,034	3,322	62,270	12,490	830	48,950	74,732	0.345
2007	478	8,445	547	38	6	0	1,509	1,750	47,370	9,690	670	37,010	60,143	0.385
2008	310	5,203	392	23	15	0	1,362	1,011	42,840	10,128	370	32,342	51,156	0.368
2009	154	3,839	515	64	4	0	1,189	1,132	29,940	7,904	626	21,410	36,837	0.419
2010	335	4,567	323	32	21	0	865	445	23,250	6,762	264	16,224	29,839	0.456
2011	528	5,596	356	88	5	0	1,243	458	27,090	6,894	479	19,717	35,363	0.442
2012	30	484	115	41	0	0	40	2	27,910	101	95	27,714	28,622	0.032
2013 ^j	not avail.	2,256	267	117	8	0	11	37	17,015	1,541	79	15,395	19,711	0.219
Avg (1986-2002)	955	7,389	523	51	6	191	308	1,317	47,930	11,997	395	35,538	57,451	0.379
Avg (2003-2013)	414	7,044	537	125	9	0	914	1,241	47,266	9,322	682	37,262	57,513	0.339
Avg (1986-2013)	754	7,253	528	85	8	88	586	1,261	47,669	10,946	508	36,215	57,475	0.363

-continued-

⁵ Begich, R. "2010-2012 Annual Management Report and Recreational Fisheries Overview...", 2014. Fishery Management Report No. 13-51, pg 100 (run strengths)



LATE RUN KINGS	1987	2013
In-river run strength	63,550	17,015
Average size	34 3/8 lb	15 lbs
Escapement	50,327	15,395 ⁶
Jacks: (3 & 4 yr-olds)	9%	66%
Males % of run	49%	88% *

* Setnet index

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-continued-

⁶ Begich, R. "2010-2012 Annual Management Report and Recreational Fisheries Overview...", 2014. Fishery Management Report No. 13-51, pg 100 (run strengths)

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* Setnet index

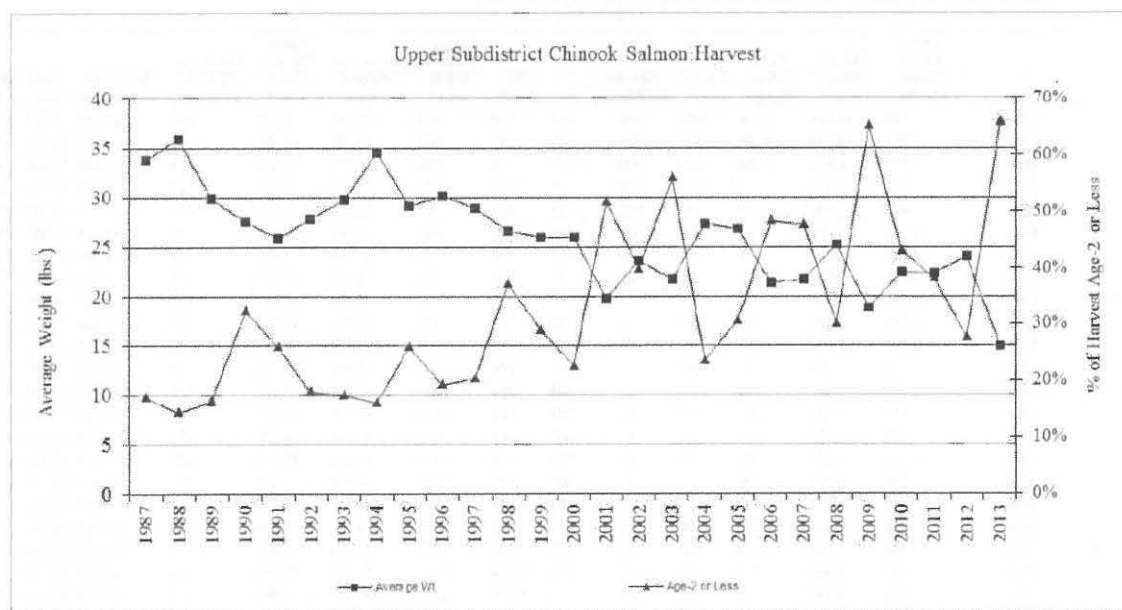


Figure 10.—Chinook salmon average weight (all fish) and percentage of the harvest comprised of ocean-age-2 or less fish in the Upper Subdistrict set gillnet commercial fishery, 1987–2013.

⁷ Shields, P. "Upper Cook Inlet Commercial Fisheries Annual Management Report," 2013. Fishery Management Report 13-49, pg 66 (weights, jacks)

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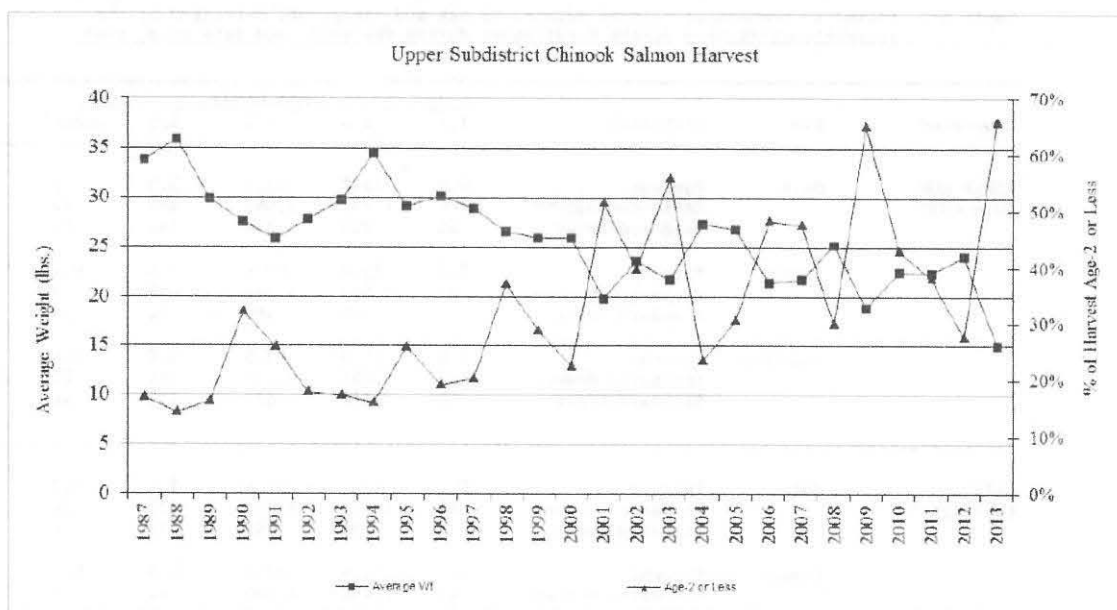


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Table 11. Estimated numbers of chinook salmon, by sex and age group, harvested by the recreational fishery in the Kenai River during the early and late runs, 1987.

Component	Sex	Statistic	Age Group					Total
			1.2	1.3	1.4	1.5	Other ¹	
EARLY RUN (n = 493) ²	Male	Percent	0.8	13.2	22.9	3.5	0.2	40.6
		Estimated Number	106	1,753	3,041	465	27	5,392
		Standard Error	54	233	321	114	27	
	Female	Percent	0.2	15.8	40.6	2.4	0.4	59.4
		Estimated Number	27	2,098	5,392	319	53	7,889
		Standard Error	27	258	460	94	38	
	Combined	Percent	1.0	29.0	63.5	5.9	0.6	100.0
		Estimated Number	133	3,851	8,433	784	80	13,281 ³
		Standard Error	60	371	623	150	46	
LATE RUN (n = 429) ²	Male	Percent	0.5	11.2	35.4	1.4	0.2	48.7
		Estimated Number	61	1,371	4,332	171	24	5,959
		Standard Error	42	205	392	70	26	
	Female	Percent	0.5	11.9	38.4	0.5	0.0	51.3
		Estimated Number	61	1,456	4,700	61	0	6,278
		Standard Error	42	212	412	42	0	
	Combined	Percent	1.0	23.1	73.8	1.9	0.2	100.0
		Estimated Number	122	2,827	9,032	232	24	12,237 ³
		Standard Error	59	306	624	82	26	

¹ Age groups 1.1 and 2.4 combined.² n = sample size.³ From Hammarstrom (1988).⁹ Conrad, R.H., "Abundance Estimate of the Escapement of Chinook Salmon into the Kenai River, Alaska, by Analysis of Tagging Data, 1987." Fishery Data Series No. 67, pg. 33 (Male %)



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Escapement	50,327	15,395
Jacks: (3 & 4 yr-olds)	9%	66%*
Males % of run	49%	88%* ¹⁰

* Setnet index

The composition by age was 22.7% age-1.1, 43.4% age-1.2, 15.2% age-1.3, and 18.6% age-1.4 fish. Sex composition was 12.5% females and 87.5% males. The mean length of all samples was 658 mm (Table 14). Standard errors for ASL composition are listed in Table 14.

¹⁰ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition of Chinook Salmon in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13-63 pg. 33 (Male %)



Late-run Kings arrive to the Kenai River after June 30.¹¹

pg 7: Fishing starts in mid-May

Chinook salmon return to Kenai River in two distinct runs, early and late. The early run usually has "fishable" numbers by mid-May and it peaks in mid-June. The majority of the stocks have passed through the fishery by late June. Late-run fish are present in July and early August.

pg 11:

The early-run Kenai River Chinook salmon fishery ends by regulation on June 30.

¹¹ Begich, R. "2010-2012 Annual Management Report and Recreational Fisheries Overview...", 2014. Fishery Management Report No. 13-51, pg 7, 11 (Late run definition)



There were 471,274 angler days fished in the Kenai and Russian Rivers in 2013. 137,963 of those angler days were below the Soldotna Bridge.¹²

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Alaska Sport Fishing Survey

Survey Area PF Estimates

Study Year: 2013

(PF) Kenai Peninsula freshwater sport fish harvest and effort estimates by fisheries and species, 2013.

Area Fished	Responses Used	Anglers	Days Fished	RS	SS	LS	RS	PS	CS	LT	DY	SH	RT	GR	WF	NP	BB	SM	Other
FRESHWATER																			
Admiral River	87	2,714	11,173	67	912	0	0	56	0	0	2,175	0	0	0	0	0	0	0	0
Deep Creek	43	1,161	2,003	130	309	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Nenah River	22	632	1,232	103	220	0	43	0	0	0	104	0	0	0	0	0	0	0	0
Kenai River - nonguided bank fishing	225	7,421	14,151	272	1,836	0	6,930	32	0	0	353	40	29	0	0	0	0	0	0
Kenai River - nonguided boat fishing	60	2,170	3,610	429	506	0	1,347	0	0	0	0	0	0	0	0	0	0	0	193
Kenai River - guided bank fishing	44	1,295	1,650	44	0	0	1,680	16	0	0	16	0	0	0	0	0	0	0	0
Kenai River - guided boat fishing	230	7,070	16,019	1,110	1,693	0	2,298	35	0	0	51	7	0	0	0	0	0	0	42
Kenai River - Cook Inlet to Soldotna Bridge - nonguided	575	35,838	118,504	661	17,483	0	119,528	1,063	129	0	968	0	404	0	0	23	0	10,345	302
Kenai River - Soldotna Bridge to Talkeetna River - nonguided	960	31,415	130,181	0	11,001	0	162,222	1,508	0	0	1,355	0	418	0	7	0	0	13,185	18
Kenai River - Moose River to Seldovia Outlet - nonguided	408	10,295	55,063	0	3,542	0	57,809	205	0	0	359	0	540	0	0	0	0	2,648	0
Kenai River - Seldovia Outlet to Kenai Lake - nonguided	490	17,194	51,818	0	1,765	0	32,130	96	0	0	310	0	344	0	0	0	0	0	64
Kenai River - reach not specified - nonguided	54	968	2,267	0	169	0	4,392	15	0	0	0	0	0	0	0	0	0	0	0
Kenai River - Cook Inlet to Soldotna Bridge - guided	394	12,572	19,069	744	6,348	0	13,795	169	0	0	109	0	60	0	0	0	0	0	43
Kenai River - Soldotna Bridge to Talkeetna River - guided	264	9,484	14,720	0	3,949	0	17,526	16	0	0	202	0	43	0	0	0	0	0	18
Kenai River - Moose River to Seldovia Outlet - guided	164	5,767	7,885	0	3,359	0	5,403	32	0	0	54	0	60	0	0	0	0	0	0
Kenai River - Seldovia Outlet to Kenai Lake - guided	245	7,885	10,399	0	1,213	0	3,935	26	0	0	182	0	102	0	14	0	0	0	0
Kenai River - reach not specified - guided	7	230	309	0	129	0	237	0	0	0	13	0	0	0	0	0	0	0	0
Quartz Creek	58	2,068	3,262	0	0	0	0	0	0	0	177	0	31	0	0	0	0	0	0
Soldotna Creek drainage	42	1,513	2,167	0	43	0	14	972	89	0	38	0	0	0	0	0	0	0	0
Russian River	727	24,270	59,662	0	1,262	0	47,308	48	0	0	198	0	275	0	0	0	0	0	0
Seldovia River	25	849	1,916	0	615	0	0	0	0	0	0	0	116	0	0	0	0	0	0
Other streams	40	1,370	3,223	0	775	0	34	137	145	43	247	0	233	0	0	0	0	0	0
Chukchi Land	22	716	1,213	0	0	0	0	0	0	0	0	0	505	653	0	0	0	0	0
Hudson Lake	20	568	1,745	0	113	0	86	0	0	197	0	17	0	0	0	0	0	0	0
Johnson Lake	19	1,101	2,223	0	0	0	0	0	0	0	0	0	832	0	0	0	0	0	0
Kenai Lake	25	876	2,964	0	0	0	0	0	0	639	16	0	231	0	0	0	0	0	0
Seldovia Lake	19	701	2,060	0	197	0	735	32	0	343	35	0	345	0	0	0	0	0	0
Summit Lake	20	1,101	2,705	0	0	0	0	0	0	166	0	723	0	0	0	0	0	0	0
Kenai Peninsula stocked lakes	45	2,029	5,233	0	0	591	0	0	0	64	0	2,096	173	0	0	0	0	0	0
Other lakes	87	2,964	5,307	0	77	0	321	0	0	236	113	0	1,366	351	0	428	0	0	0
Freshwater Total	5,821	140,890	547,120	3,870	60,784	691	497,786	4,498	583	1,488	7,549	47	8,870	1,177	21	491	0	26,178	730

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¹² ADF&G website, "Kenai Peninsula freshwater sport fish harvest and effort estimates by fisheries and species, 2013." <http://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=area.results>

The Kenai River downstream of the Soldotna Bridge (River Mile 21) is the most heavily fished part of the Kenai River by an order of magnitude.¹³

Reimer ROP.SF.2A.2013.14, pg 9,

Soldotna Bridge. The Kenai River fishery is characterized by a large number of guided anglers and a large number of non-resident anglers (both guided and non-guided). Many of these anglers are passive participants in the decision of when and where to fish. Chinook salmon angling effort downstream of the Soldotna Bridge exceeds Chinook salmon angling effort upstream of the Soldotna Bridge by up to an order of magnitude (Table 3).

Table 3—Ratio of Kenai River Chinook salmon upstream of the Soldotna Bridge to total harvest, Statewide Harvest Survey and Guide Logbook program.

Year	Run	Cook Inlet to Soldotna Bridge		Soldotna Bridge to Skilak Lake		Total		upstream / total
		est.	SE	est.	SE	est.	SE	
SWHS (guided harvest only)								
2006	Early	2,365	262	893	161	3,258	307	0.27
2007	Early	1,701	192	505	152	2,206	245	0.23
2008	Early	1,574	171	452	100	2,026	198	0.22
2009	Early	491	110	262	66	753	128	0.35
2010	Early	425	84	356	76	781	113	0.46
2011	Early	928	144	368	94	1,296	172	0.28
2006	Late	4,706	366	1,295	165	6,001	401	0.22
2007	Late	5,029	416	1,091	160	6,120	446	0.18
2008	Late	4,449	331	772	111	5,221	349	0.15
2009	Late	2,914	254	784	142	3,698	291	0.21
2010	Late	2,993	287	837	141	3,830	320	0.22
2011	Late	3,758	360	514	122	4,272	380	0.12
Guide Logbook data								
2006	Early	2,053		383		2,436		0.16
2007	Early	1,504		360		1,864		0.19
2008	Early	1,645		231		1,876		0.12
2009	Early	500		61		561		0.11
2010	Early	503		228		731		0.31
2011	Early	503		25		528		0.06
2006	Late	5,978		168		6,146		0.03
2007	Late	5,001		239		5,240		0.05
2008	Late	4,693		310		5,003		0.06
2009	Late	3,108		285		3,393		0.08
2010	Late	2,177		566		2,743		0.21
2011	Late	3,076		16		3,092		0.01

pg 8:

During 2011, low water precluded boat access to the Kenai River upstream of the Soldotna Bridge until mid-June. Harvest sampling staff were amongst the first to access the area, by jet boat, and were sampling before propellor-driven fishing boats had accessed the area. Staff sampled only 4 fish over 11 days prior to the trophy fishing restriction that began on June 29 and continued through the end of the season. Trophy fishing (catch and release for fish between 20 inches and 55 inches total length) virtually eliminated angling harvest and effort upstream of the Soldotna Bridge because harvest opportunity remained available downstream and anglers focused their effort in that area. Boats that remained had little opportunity for legal harvest because there are very few Chinook salmon less than 20, or greater than 55, inches total length in the Kenai River drainage.⁶

Given these observations, it is probable that very few Chinook salmon were harvested upstream of the Soldotna Bridge in 2011, especially during the late run. However, SWHS estimates for 2011 were 521 (se=111) for the early run and 894 (se=161) for the late run, which is far more harvest than is feasible under the circumstances described above. SWHS staff were unable to discern anything unusual in the individual responses they received. We hypothesize that some lower river anglers misreport their geographic location causing a positive bias in the Chinook salmon harvest estimate upstream of the Soldotna Bridge. We suspect that this bias may extend to years other than just 2011.

¹³ Reimer, A., "Kenai River Chinook Salmon Abundance and Migratory Timing," 2013. Regional Operational Plan SF.2A.2013.14 pg 9 (order of magnitude)



More late-run Kings spawn below the Soldotna Bridge than in any other section.¹⁴

Reimer, RIR.2A.2013.06 pg 55:

just below Slikok Creek (RM 18.5). Because the Kenai River downstream of the Soldotna Bridge (RM 21) is the most heavily utilized mainstem spawning area in both historic and recent data (Table 2 and Tables 11–12), closures upstream of Slikok Creek have little conservation value for the largest spawning aggregate, and will fail to conserve mainstem spawning Chinook salmon in proportion to abundance. This situation is illustrated for 2012 and 2013 in Figure 20. During both seasons, conservation measures enacted downstream of Slikok Creek would more effectively conserve mainstem spawning Chinook salmon that spawn in all sections of the Kenai River drainage. Conservation measures enacted downstream of Slikok Creek are also applicable to more Chinook salmon because most use of the area upstream of Slikok Creek by fish we monitored did not occur until after the fishery closed (July 31) in both years (Figure 20).

¹⁴ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010–2013, a Report to the Alaska Board of Fisheries 2014," 2013. Regional Information Report No. 2A13-06 pg 55 (proportion to abundance)



EARLY RUN KINGS	1987	2013
In-river run strength	25,643 ¹⁵	2,038
Escapement	12,362	2,033*

In-river run strength (25,643) = Kings Retained (13,281) + Estimated Escapement (12,362)

Table 1. Estimated escapements and numbers of chinook salmon that were caught, released, and retained in the Kenai River recreational fishery during 1986 through 1990.

Year	Run Component	Numbers of Chinook Salmon			Percent Released	Estimated Escapement ^a
		Caught	Retained	Released		
1986	Early	12,117	7,561	4,556	38	19,519
	Late	15,331	9,004	6,327	41	48,559
	Both	27,448	16,565	10,883	40	68,078
1987	Early	19,119	13,281	5,838	31	12,362
	Late	16,701	12,237	4,464	27	52,787
	Both	35,820	25,518	10,302	29	65,149
1988	Early	18,693	12,747	5,946	32	8,133
	Late	23,238	17,512	5,726	25	34,496
	Both	41,931	30,259	11,672	28	42,629
1989	Early	9,901	7,256	2,645	27	10,736
	Late	12,210	9,127	3,083	25	19,908
	Both	22,111	16,383	5,728	26	30,644
1990	Early ^b	4,973	1,735	3,238	65	8,656
	Late ^b	8,637	6,247	2,390	28	25,770
	Both	13,610	7,982	5,628	41	34,426
All	Early	64,803	42,580	22,223	34	59,406
	Late	76,117	54,127	21,990	29	181,520
	Both	140,920	96,707	44,213	31	240,926

^a Inriver return minus the sport harvest.

^b Release of catch mandatory for all or part of run.

¹⁵ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. FDS 91-39 pg 4 (1987 early-run strength, escapement);



EARLY RUN KINGS	1987	2013
In-river run strength	25,643	2,038 ¹⁶
Escapement	12,362	2,033

Table 7.—Early-run Kenai River Chinook salmon population data, 1986–2013.

Year	Cook Inlet Marine Harvest	Misc. Marine	Kenaitze Educational ^a	Inriver Run ^b	Sport Harvest Above Sonar ^c	Catch-and- Release Mortality	Spawning Escapement	Total Run	Harvest Rate
1989	193	0	73	12,290	8,394	149	3,747	12,556	0.702
1990	235	0	40	9,842	1,807	378	7,657	10,117	0.243
1991	241	0	2	10,620	1,945	152	8,523	10,863	0.215
1992	300	0	73	11,930	2,241	236	9,453	12,303	0.232
1993	407	0	118	12,490	9,342	286	2,862	13,015	0.780
1994	343	0	56	13,160	8,171	285	4,704	13,559	0.653
1995	412	0	37	12,890	10,217	357	2,316	13,339	0.826
1996	235	0	104	9,764	6,623	287	2,854	10,103	0.718
1997	282	0	122	11,140	6,429	349	4,362	11,544	0.622
1998	289	0	131	11,930	1,170	254	10,506	12,350	0.149
1999	245	0	114	13,480	8,129	261	5,090	13,839	0.632
2000	239	0	124	10,790	1,818	185	8,787	11,153	0.212
2001	184	0	198	14,020	2,399	205	11,416	14,402	0.207
2002	168	0	48	10,860	899	78	9,883	11,076	0.108
2003	202	0	126	20,450	2,839	389	17,222	20,778	0.171
2004	194	0	72	23,460	3,386	257	19,817	23,726	0.165
2005	187	341	76	20,810	3,810	253	16,747	21,414	0.218
2006	252	0	65	18,180	4,693	205	13,282	18,497	0.282
2007	201	41	16	13,630	3,493	220	9,917	13,888	0.286
2008	107	102	40	10,210	3,500	123	6,587	10,459	0.370
2009	71	16	49	7,741	1,466	97	6,178	7,877	0.216
2010	88	48	32	7,830	1,337	90	6,403	7,998	0.199
2011	110	0	42	9,895	1,337	92	8,466	10,047	0.157
2012	89	0	19	5,387	316	10	5,061	5,495	0.079
2013 ^d	not avail	0	11	2,038	0	5	2,033	2,049	0.008
Avg (1986–2002)	254	0	89	13,344	6,265	256	6,824	13,671	0.479
Avg (2003–2013)	150	50	50	12,694	2,380	158	10,156	12,930	0.196
Avg (1986–2013)	215	20	72	13,089	4,739	218	8,133	13,380	0.368

Source: Statewide Harvest Surveys from Mills 1987–1994, Howe et al. 1995, 1996, 2001a–d, Walker et al. 2003, Jennings et al. 2004, 2006a–b, 2007, 2009a–b, 2010a–b, 2011, In Prep. Romberg et al. In prep; Alexandersdottir and Marsh 1990; Nelson et al. 1999, Hammarstrom and Timmons 2001a, Reimer et al. 2002, Reimer, A. 2003, 2004a–b, 2007; Ekelin, A. 2007, 2009, 2010; Perschbacher 2012a–d, J. Perschbacher, Sport Fish Biologist, ADF&G, Soldotna, personal communication; McKinley and Fleischman 2013, 1994–2012 Educational data supplied by the Kenaitze Indian Tribe; Tim McKinley personal communication.

Note: ND = no data available.

^a Prior to 1994, there was no educational fishery, this was considered a subsistence fishery.

^b Inriver sonar estimate from 1986 to 2012 estimated using a run reconstruction model from McKinley and Fleischman 2013, FMS 13-05.

^c Includes creel survey estimates for the area from Cook Inlet to the Soldotna Bridge and estimates from the SWHS from the Soldotna Bridge to the outlet of Kenai Lake.

^d 2013 estimates are preliminary until biometrically reviewed and published.

¹⁶ Begich, R., “2010–2012 Annual Management Report and 2013 Recreational Fisheries Overview for Northern Kenai Peninsula: Fisheries under Consideration by the Alaska Board of Fisheries, 2014.” pg 99 (2013 early-run strength, escapement)



<u>EARLY RUN KINGS</u>	<u>1987</u>	<u>2013</u>
In-river run strength	25,643	2,038
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	Both	140,920	96,707	44,213	31	240,926

^a Inriver return minus the sport harvest.

^b Release of catch mandatory for all or part of run.

¹⁷ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. FDS 91-39 pg 4 (1987 early-run strength, escapement)

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Avg (1986–2013)	215	20	72	13,089	4,739	218	8,133	13,380	0.368

Source: Statewide Harvest Surveys from Mills 1987–1994, Howe et al. 1995, 1996, 2001a–d, Walker et al. 2003, Jennings et al. 2004, 2006a–b, 2007, 2009a–b, 2010a–b, 2011, In Prep. Romberg et al. In prep, Alexandersdottir and Marsh 1990; Nelson et al. 1999, Hanumstrom and Timmons 2001a, Reimer et al. 2002, Reimer, A. 2003, 2004a–b, 2007; Eskelin, A. 2007, 2009, 2010; Perschbacher 2012a–d, J. Perschbacher, Sport Fish Biologist, ADF&G, Soldotna, personal communication; McKinley and Fleischman 2013; 1994–2012 Educational data supplied by the Kenaitze Indian Tribe; Tim McKinley personal communication.

Note: ND = no data available.

^a Prior to 1994, there was no educational fishery; this was considered a subsistence fishery.

^b Inriver sonar estimate from 1986 to 2012 estimated using a run reconstruction model from McKinley and Fleischman 2013, FMS 13-03.

^c Includes creel survey estimates for the area from Cook Inlet to the Soldotna Bridge and estimates from the SWHS from the Soldotna Bridge to the outlet of Kenai Lake.

^d 2013 estimates are preliminary until biometrically reviewed and published.

¹⁸ Begich, R., “2010–2012 Annual Management Report and 2013 Recreational Fisheries Overview for Northern Kenai Peninsula: Fisheries under Consideration by the Alaska Board of Fisheries, 2014.” pg 99 (2013 early-run strength, escapement)



*Did not make the minimum escapement goal of 5,300.¹⁹
pg 10:

Inseason Management Approach

The primary objective of inseason management is to achieve a spawning escapement within the OEG range of 5,300 to 9,000 early-run Chinook salmon. Achievement of this escapement

¹⁹ Begich, R., "2010-2012 Annual Management Report and 2013 Recreational Fisheries Overview for Northern Kenai Peninsula: Fisheries under Consideration by the Alaska Board of Fisheries, 2014." pg 10 (minimum escapement);



ADF&G early-run Kenai Kings are counted from May 15 to June 30.²⁰

Eskelin, pg 8:

ESSN commercial harvests are reported for 7 statistical areas: Ninilchik Beach (244-22), Cohoe Beach (244-22), South K-Beach (244-31), North K-Beach (244-32), Salmatof Beach (244-41), East Forelands (244-42), and Kasilof River special harvest area (KRSHA) (244-25) (Figure 2). The Kasilof Section is composed of Ninilchik Beach, Cohoe Beach, and South K-Beach. The Kenai Section is composed of North K-Beach and Salmatof Beach. The East Forelands statistical area is its own section, but was grouped with the Kenai Section in this study. KRSHA is not commonly opened for fishing but has been opened at times to concentrate harvest of Kasilof River sockeye salmon while minimizing harvest of other stocks. The Kasilof Section opens the first Monday or Thursday on or after 25 June but can open as early as 20 June if ADF&G estimates that 50,000 sockeye salmon are in the Kasilof River before 25 June (Alaska Administrative Code 5 AAC 21.310 b. 2.C.[i]). The Kenai and East Forelands sections do not open until the first Monday or Thursday on or after 8 July.

²⁰ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition of Chinook Salmon in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13.63 pg 8 (Kasilof opening)



On average mainstem and tributary spawners mill in-river for 33 days up to 67 days.^{21 22}

Bendock, FMS 92-2 pg 41:

The duration of time between tagging and death (stream life) was calculated for 282 fish that were judged to have spawned (Table 16). Mean stream life was 33 days (SE = 0.609) and ranged from 8 to 67 days. Stream life was significantly longer for tributary spawners (mean = 35.1 d, SE = 0.7428) and consequently for early-run fish, than for mainstem spawners (mean = 30.3 d, SE = 0.9846). Fish that spawned in Benjamin Creek had the longest stream life (41.5 d) and mainstem spawners had the shortest (30.5 d).

Reimer RIR No 2A13-06 pg 36:

early bound on the date when spawning could have begun. Chinook salmon with spawning destinations within the Kenai River mainstem began displaying site fidelity to their eventual spawning area as early as late June although in most years and river sections, no site fidelity was displayed until July. The median date for radiotagged Chinook salmon to begin displaying site fidelity to their eventual spawning area varied between 12 and 21 August for all years and river sections. All radiotagged Chinook salmon with a mainstem spawning destination displayed site fidelity to their eventual spawning area by early September. Site fidelity lasted for 6–63 days (median 14 days)⁸. Spawning is assumed to have occurred toward the end of each fish's site

Bendock, FDS 91-39, pg 37:

Management objectives for the chinook salmon fishery change on 1 July as late-run fish begin to enter the river. To escape the inriver recreational fishery, early-run chinook salmon must either enter tributary drainages or continue moving upstream beyond rkm 80 in the mainstem. Twenty-two percent of the radio-tagged early-run fish never exited the area open to sport fishing. On 2 July, 70% of the tagged early-run fish that were ultimately judged to be spawners remained available to harvest in the lower 80 km of mainstem and 33% were still vulnerable to harvest on 14 July. Thus, early-run salmon remain vulnerable to harvest throughout much of the late run.

²¹ Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2, pg 41, 46

²² Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, A Report to the Alaska Board of Fisheries 2014." RIR No. 2A13-06 pg 36 (site fidelity up to 63 days)



The Bendock catch-and-release mortality study estimated 70% of early-run Kings were available to in-river, sportfish harvest in July.²³

Bendock, FMS 92-2 pg 41:

The duration of time between tagging and death (stream life) was calculated for 282 fish that were judged to have spawned (Table 16). Mean stream life was 33 days (SE = 0.609) and ranged from 8 to 67 days. Stream life was significantly longer for tributary spawners (mean = 35.1 d, SE = 0.7428) and consequently for early-run fish, than for mainstem spawners (mean = 30.3 d, SE = 0.9846). Fish that spawned in Benjamin Creek had the longest stream life (41.5 d) and mainstem spawners had the shortest (30.5 d).

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²³ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. FDS 91-39 pg 37

A 2010-2013 tagging study showed that as late as July 31, more than 30% of tagged fish detected in open-to-fishing waters above Slikok Creek on the Kenai River were early-run, mainstem spawners.²⁴

Reimer: 30% early-run, July 31, 2013, Upstream:

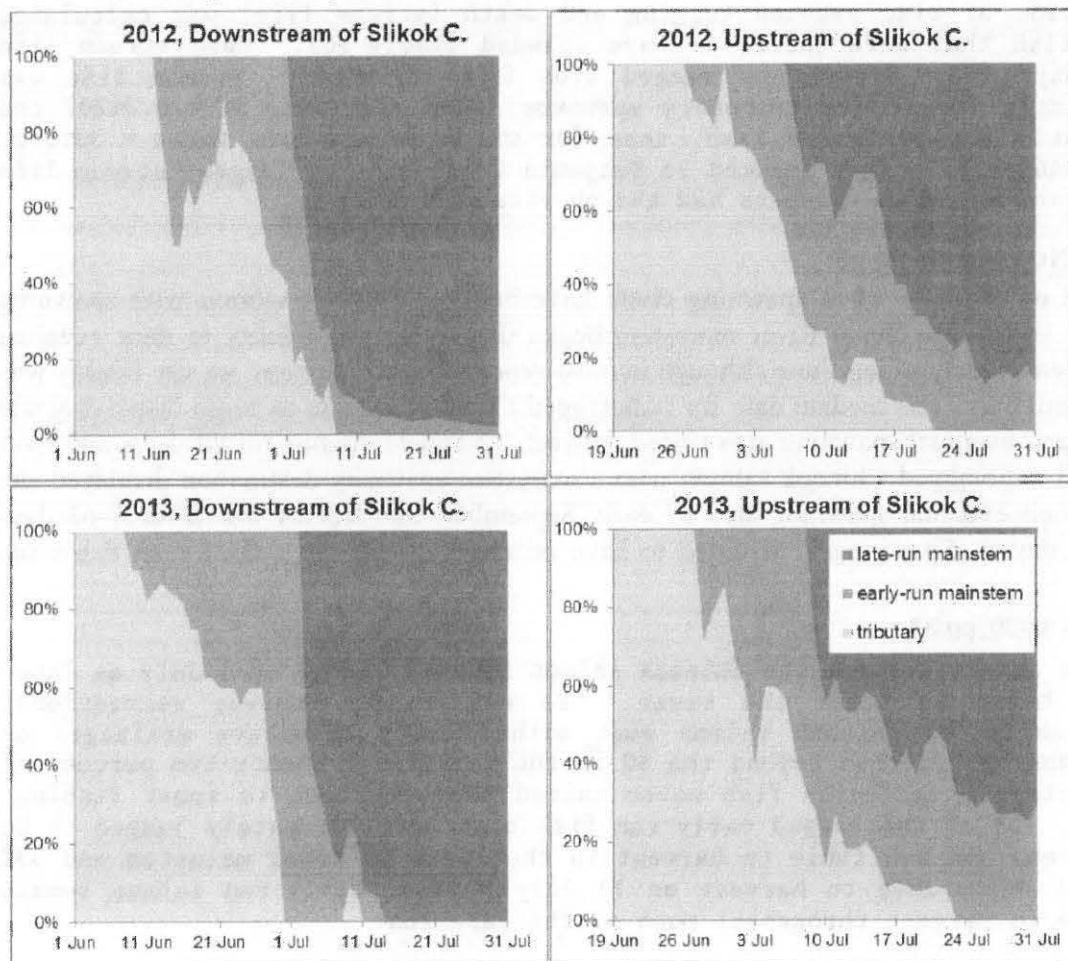


Figure 14.—Proportion of radiotagged Chinook salmon detected in the Kenai River Chinook salmon sport fishery upstream and downstream of Slikok Creek by assigned spawning destination and entry timing, 2012 and 2013.

Note: "Upstream of Slikok Creek" excludes the closed and restricted fishing areas around Slikok Creek, Centennial Park, Funny River, Morgan's Landing, and Killey River plus the Kenai River upstream of and including Skilak Lake.

²⁴ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, A Report to the Alaska Board of Fisheries 2014." RIR No. 2A13-06 pg 46 (early-run mainstem fish through July)



Over 90% of the early-run King return to the river was caught by sportfishermen in 1988. 5,946 (73% of escapement) of those were caught-and-released.²⁵

Bendock, pg 2:

Between 1986 and 1991, an estimated 48,280 chinook salmon (32% of the catch) were released by anglers (Table 1). In the early-run component of the 1988 fishing season, over 90% of the total chinook salmon return to the river was caught. The released component of that catch (5,946 fish) represented 73% of the estimated escapement. The fate of these hooked-and-released fish was

²⁵ Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991" 1992. pg 2 (90% catch)



PRODUCTIVITY

Each run is composed of Kings of mixed parent (brood) years from 2 to 8 years earlier.

Jacks may be defined as young, sexually mature 3 or 4 year-old males that return to spawn earlier than the females of their brood year.²⁶

Heredity 72 (1994) 146–154
©The Genetical Society of Great Britain

Received 3 Ju

Genetic, environmental and interaction effects on the incidence of jacking in *Oncorhynchus tshawytscha* (chinook salmon)

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Jacking in chinook salmon, *Oncorhynchus tshawytscha*, is defined as sexual maturation of males after at least 1 year in sea water, occurring 1 year prior to any of the females of the same cohort. A

²⁶ Daniel, D., "Genetic, environmental and interaction effects on the incidence of jacking in *Oncorhynchus tshawytscha* (chinook salmon)," 1994. *Heredity* 72 (1994) 146–154 pg 1 (def: jack)

In a 1984 study, 4 year-old early-run Kenai Kings were 27 inches in length and smaller, averaging 22 inches in total length.²⁷

Hammarstrom, pg 100:

Table 14. Summarized Age/Weight/Length Data from Readable Scales Collected from Chinook Salmon Taken in the Recreational Fishery on the Kenai River, 1984.

Age Class Brood Year	1.2 1980	1.3 1979	1.4 1978	1.5 1977	Total
Early Run					
Number	10	81	180	20	291
Percent	3.4	27.8	61.9	6.9	100.0
Length Range (mm)*	420-690	660-990	790-1,190	950-1,210	420-1,210
Mean Length (mm)*	536	798	993	1,071	929
Mean Weight (kg)	3.5	9.6	18.2	22.1	15.6
Late Run					
Number	43	78	305	62	488
Percent	8.8	16.0	62.5	12.7	100.0
Length Range (mm)*	560-780	670-1,010	810-1,220	970-1,295	560-1,295
Mean Length (mm)*	670	860	1,039	1,127	1,000
Mean Weight (kg)	5.9	12.4	22.1	25.7	22.1

* Lengths are mid-eye to fork of tail.

1984 Age-Length Correlation in Kings (Mid-eye to tail-fork lengths)

EARLY RUN:

420 mm = 16.5" 4 yr-old (1:2)
690 mm = 27" 4 yr-old (1:2)
Mean Length = 22"
Mean Weight = 7.7lbs

660 mm = 26" 5 yr-old (1:3)
990 mm = 39" 5 yr-old (1:3)
Mean Length = 31.3"
Mean Weight = 21.2lbs

790 mm = 31" 6 yr-old (1:4)
1,190 mm = 47" 6 yr-old (1:4)
Mean Length = 39.1"
Mean Weight = 40.1lbs

950 mm = 37" 7 yr-old (1:5)
1,210 mm = 47.6" 7 yr-old (1:5)
Mean Length = 42.2"
Mean Weight = 48.7lbs

LATE RUN:

560 mm = 22" 4 yr-old (1:2)
780 mm = 31" 4 yr-old (1:2)
Mean Length = 26.4"
Mean Weight = 13lbs

670 mm = 26" 5 yr-old (1:3)
1,010 mm = 40" 5 yr-old (1:3)
Mean Length = 33.9"
Mean Weight = 27.3lbs

810 mm = 32" 6 yr-old (1:4)
1,220 mm = 48" 6 yr-old (1:4)
Mean Length = 41.7"
Mean Weight = 48.7"

970 mm = 38" 7 yr-old (1:5)
1,295 mm = 51" 7 yr-old (1:5)
Mean Length = 44.4"
Mean Weight = 56.7lbs

²⁷ Hammarstrom, S., "Annual Performance Report for Kenai Peninsula Chinook and Coho Salmon," 1984.
pg 100 (age-length table)

Kings have narrow-sense (strongly inherited) heredity traits including 1) age-at-maturity and 2) size-at-age.

28

Hankin, pg 1:

consequence of troll fishery harvest of immature salmon. Results suggest that (a) heritability of age of maturity is relatively high in this species (calculated h^2 were 0.49–0.57 and 0.39–0.41 for males and females, respectively), (b) inheritance of age of maturity of females appears to be independent of age of male parent, and (c) for a given parental age, "faster growing" progeny generally mature at younger ages, but (d) progeny from older parents are not generally smaller at age than progeny from younger parents. Inheritance of age of maturity therefore cannot be a simple reflection of inheritance of growth rate. We tentatively propose the

pg 348:

Ricker (1972) summarized the then available information on inheritance of age of maturity in chinook salmon based on such "age-specific mating experiments" (see Ellis and Noble 1960, 1961; Donaldson and Menasveta 1961; Donaldson and Bonham 1970). He concluded that the genetic influence on age of maturity is strong and that male and female ages are to some extent determined independently. Generally, older (and larger) parents produced progeny that matured at older ages and larger sizes than did younger (and smaller) parents.

Inheritance of age of maturity of chinook salmon has substantial importance for fishery management because size-selective commercial and sport fisheries shift the age composition of spawning runs toward younger and smaller fish. Rutter

²⁸ Hankin, D., "Evidence for Inheritance of Age of Maturity in Chinook Salmon (*Oncorhynchus tshawytscha*)," 2011. Canadian Journal of Fisheries and Aquatic Sciences 50(2):347-358 pg 1, 348



Older, larger female Kings are more productive and may produce more than 4 times more eggs than smaller, younger Kings.^{29 30}

pg 491:

E. Fecundity

Chinook salmon fecundity varies by stock and the size of the female; however, northern stocks generally produce more eggs. In Alaska, the number of eggs ranges from 4,242 to 17,255 per female (Morrow 1980, Burger et al. 1983).

491

(Morrow, 1980, Burger, 1983)

Morrow, J.E., "The freshwater fishes of Alaska," 1980.

Burger, C.V., "Salmon investigations in the Kenai River, Alaska, 1979-1981," 1983.

Hard, pg 774:

captures a broad range of fish sizes. Removal of the largest fish will have a disproportionate impact because of the contribution of their high fertility to population growth rate (Birke-land and Dayton 2005; Hutchings and Fraser

²⁹ ADF&G, "Chinook Salmon Life History and Habitat Requirements," 1985. pg 491 (4 times)

³⁰ Hard, J., "Genetic Consequence of Size-Selective Fishing: Implications for Viability of Chinook Salmon in the Arctic-Yukon-Kuskokwim Region of Alaska," 2009. pg 774 (disproportionate impact)



In 1988, ADF&G estimated an early-run return of 57 8 year-old Kenai Kings, 1,413 7 year-olds, and 5,001 6 year-olds.³¹

pg 14 1986 Age classes

Table 2. Estimates by age class of the total number of early-run Kenai River chinook salmon, 1986-1990.

Year	Age Class														Total
	0.2	0.3	0.4	0.5	1.1	1.2	1.3	1.4	1.5	1.6	2.1	2.2	2.3	2.4	
1986															
Estimated Number	0	0	0	0	0	4,554	11,730	8,880	1,908	0	0	0	0	7	27,080
SE						1,755	4,239	3,195	703					19	9,795
1987															
Estimated Number	0	0	0	0	0	386	9,653	14,883	589	0	0	0	31	101	25,643
SE						125	2,080	3,732	226				31	56	5,928
1988															
Estimated Number	0	0	0	0	0	350	3,088	15,077	2,279	57	0	0	21	0	20,880
SE						97	260	335	237	40			21		0
1989															
Estimated Number	0	0	0	0	0	759	2,853	12,789	1,665	0	0	0	0	0	18,065 ^a
SE						137	250	311	195						0
1990															
Estimated Number	0	0	0	0	0	800	2,818	6,540	648	0	0	0	0	0	10,808 ^b
SE						133	214	241	114						0

^a Includes 73 fish harvested in educational gill nets.

^b Includes 40 fish harvested in educational gill nets.

³¹ Sonnichsen, S., "Estimates of Total Return by Age for Kenai River Chinook Salmon, 1986-1990," 1991. Fishery Data Series No. 91-69 pg 14 (1988 8 year-olds)

The nest ("redd") of a large female King may be as deep as 2.5 feet and larger than 150 square feet.³²

pg 1688 redd depths up to 80 cm

"Riverine egg salmon depths: review of published data and implications for scour studies," by Paul DeVries, 1997.

Table 1 (continued).

Species/authors	Datum ^a	Portion of pocket ^a	Depth (cm)			Location	Method	Comments ^b
			Mean	n	Range			
Shepard et al. (1984a)	Overlying gravel	Top			>14	Montana	McNeil	
Shepard et al. (1984b)	Overlying gravel	Top			10-20	Montana		
Heimer (1965)					8-15	Idaho		Cited in Shepard et al. 1984b
Allan (1980)					3-18	Alberta		Cited in Shepard et al. 1984b
Chinook salmon								
Miller (1985)	Original level	Bottom	30			Washington		General criterion based in part on own data
Hobbs (1937)	Original level	Discrete eggs			30-41	New Zealand	Excavation	Considered 99% of eggs to be within this layer
Vronskii and Leman (1991)	Original level	Discrete eggs			21-50	USSR		Depths at which eggs reportedly found most frequently
Hobbs (1937)	Original level	Top			15-46	New Zealand	Observation	Redd excavation depths
Hobbs (1937)	Original level	Top			>20	New Zealand	Excavation	Eggs usually expected below this depth
Burner (1951)	Original level	Top	22-27		5-51	Washington	Observation	Deepest part of redd measured at different time intervals
Briggs (1953)	Original level	Top		2	28-36	California	Observation	Depth of pit prior to egg deposition
Scott and Crossman (1973)	Original level	Top			<31	Canada		Redd excavation depth: general criterion
Miller (1985)	Original level	Top	15			Washington		General criterion based in part on own data
Vronskiy (1972)	Overlying gravel	Bottom	53	10	40-80	USSR	Excavation	Maximum depths in 10 mounds
Chapman et al. (1986)	Overlying gravel	Bottom	29	54	19-37	Columbia River	Probing	May be underestimates according to authors
Hawke (1978)	Overlying gravel	Center	36	7	32-41	New Zealand	Excavation	Stranded redds; redd means
Hawke (1978)	Overlying gravel	Center			18-43	New Zealand	Excavation	Stranded redds; all data
Briggs (1953)	Overlying gravel	Top	28	8	20-36	California	Excavation	
Vronskiy (1972)	Overlying gravel	Top	21	10	10-46	USSR	Excavation	Minimum depths in 10 mounds
Chapman et al. (1986)	Overlying gravel	Top	19	116	10-33	Columbia River	Excavation	Depth to first embryos encountered
Chum salmon								
Braya (1981)	Original level	Bottom		4	20-40	Washington	Freeze	Gravel disturbance by spawners (control); RFL = 65-74 cm
Burner (1951)	Original level	Top	22		8-43	Washington	Observation	Deepest part of redd measured at different time intervals
Scott and Crossman (1973)	Original level	Top			<41	Washington		Redd excavation depth: general criterion
Salo (1991)	Original level	Top			20-40	North America		General criterion for redd pit depth prior to egg deposition
Montgomery et al. (1996)	Original level	Top	23	40	10-49	Washington	Excavation	
Braya (1981)	Overlying gravel	Discrete eggs		4	10-30	Washington	Freeze	93% of eggs recovered (control); RFL = 65-74 cm
Tripp and Poulin (1986)	Overlying gravel	Discrete eggs		34	0-45	B.C.	Probing	
Tripp and Poulin (1986)	Overlying gravel	Discrete eggs			10-35	B.C.	Probing	Majority of eggs (>90%)
L. Powell (in Scrivener and Brownlee 1989)	Overlying gravel	Discrete eggs			5-20	B.C.	Freeze	Cited personal communication
K.V. Koski (in Scrivener and Brownlee 1989)		Discrete eggs			10-50	Washington		Cited personal communication
K.V. Koski (in Scrivener and Brownlee 1989)		Discrete eggs	22			Alaska		Cited personal communication
Bazarkin (1990)		Discrete eggs			30-40	USSR		
Meehan and Bjornn (1991)		Discrete eggs			15-30	North America		General criterion

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Can. J. Fish. Aquat. Sci. Vol. 54, 1997

³² deVries, P., "Riverine salmon egg burial depths: review of published data and implications for scour studies," 1997. Can. J. Fish. Aquat. Sci. Vol 54 pg 1688 (redd depths)

Because age-at-maturity is strongly inherited, young jacks return more jacks.³³ Larger, older Kings at maturity beget larger, older Kings at maturity.^{34 35}

pg 348:

1970). He concluded that the genetic influence on age of maturity is strong and that male and female ages are to some extent determined independently. Generally, older (and larger) parents produced progeny that matured at older ages and larger sizes than did younger (and smaller) parents.

Inheritance of age of maturity of chinook salmon has substantial importance for fishery management because size-selective commercial and sport fisheries shift the age composition of spawning runs toward younger and smaller fish. Rutter

pg 355:

maturity of progeny. The most meaningful estimates of heritability from these experiments are probably those based on freshwater returns of mature progeny from the 1974 brood year, adjusted for ocean fishery interceptions of immature fish (i.e. hypothetical unexploited age composition of mature progeny, Table 6). These estimates, 0.57 and 0.40 for males and females, respectively, are similar to those reported by Gjerde (1984) and Gjerde and Gjedrem (1984) for Atlantic salmon (*Salmo salar*) (0.39 for males and 0.48–0.49 for females) (see also Gjedrem 1985) and by Gall et al. (1988) for rainbow trout (*Oncorhynchus mykiss*) (0.38) (see also Tipping 1991). Iwamoto et al. (1984) found that tendency for males to mature as jacks was also strongly dependent on male parent age in coho salmon

Continued next page...

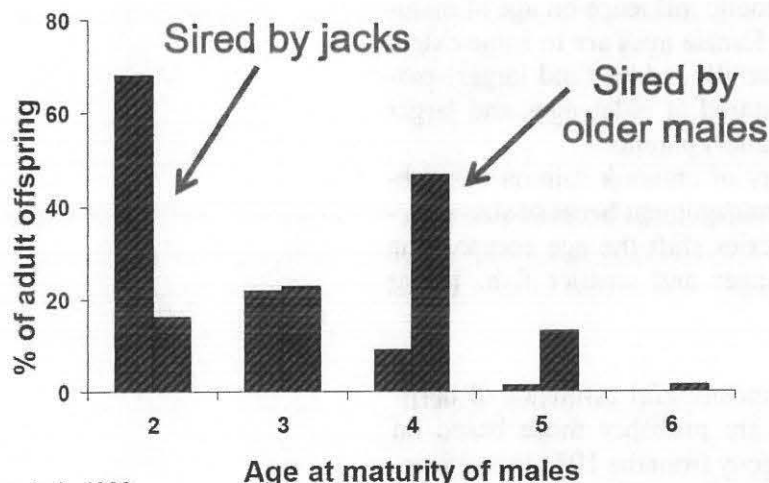
³³ http://courses.washington.edu/fish450/Lecture%20PDFs/Salmon_age_and_size_at_maturity.pdf

Roni, P., "Salmon age and size at maturity: Patterns and processes." UW-SAFS-Fish_450 pg 38

³⁴ Hankin, D., "Evidence for Inheritance of Age of Maturity in Chinook Salmon (*Oncorhynchus tshawytscha*)," 1993. pg 348 ("generally,..."), pg 354 (tables)

³⁵ Hard, J., "Early Male Maturity in Two Stocks of Chinook Salmon (*Oncorhynchus Tshawytscha*) Transplanted to an Experimental Hatchery in Southeastern Alaska," 1985. pg 357

Females mated with jack Chinook salmon produced more jacks and fewer old males than females mated with older males



Hankin et al. 1993.

Hard pg 357:

The difference in rates of early male maturity observed between the two stocks of chinook salmon supports previous findings that male age-at-maturity in this species is strongly heritable. The presence of early-maturing

Hankin, 1993, pg 354 (white = male, black = female):

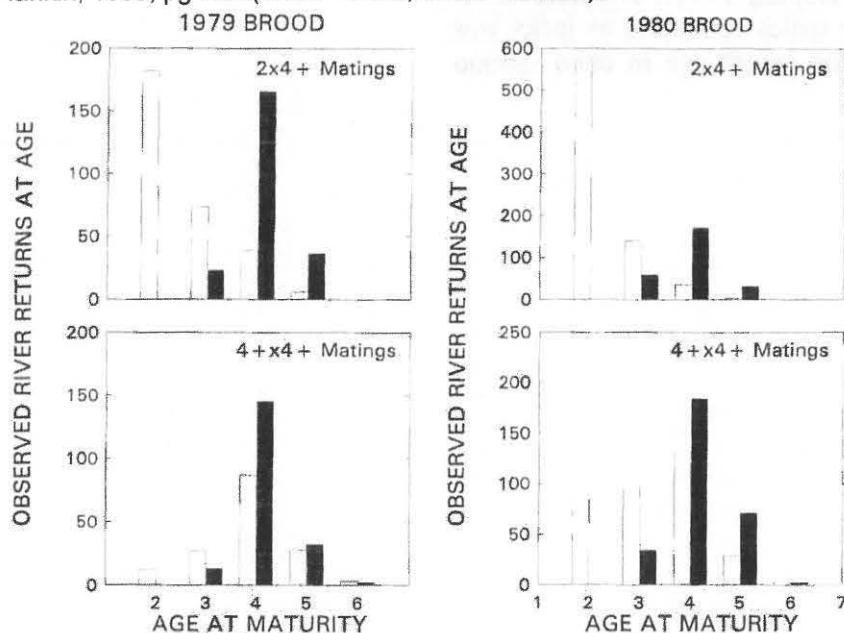


FIG. 3. Observed age- and sex-specific returns of fall chinook salmon to Elk River from 1979 brood year matings of age 2 males with age 4-6 females ($2 \times 4+$ matings) and of age 4-6 males with age 4-6 females ($4+ \times 4+$ matings). Release group sizes were 71 943 and 73 742 fish for the $2 \times 4+$ and $4+ \times 4+$ groups, respectively. Observed returns of males (open bars) at ages 2-6 were 182, 74, 39, 6, and 0, respectively, for $2 \times 4+$ matings and 12, 27, 87, 28, and 3, respectively, for $4+ \times 4+$ matings. Observed returns of females (solid bars) at ages 2-6 were 0, 23, 166, 36, and 0, respectively, for $2 \times 4+$ matings and 0, 13, 145, 32, and 2, respectively, for $4+ \times 4+$ matings.

FIG. 4. Observed age- and sex-specific returns of fall chinook salmon to Elk River from 1980 brood year matings of age 2 males with age 4-6 females ($2 \times 4+$ matings) and age 4-6 males with age 4-6 females ($4+ \times 4+$ matings). Release group sizes were 105 084 and 114 528 fish for the $2 \times 4+$ and $4+ \times 4+$ groups, respectively. Observed returns of males (open bars) at ages 2-6 were 569, 140, 36, 4, and 0, respectively, for $2 \times 4+$ matings and 85, 97, 132, 29, and 3, respectively, for $4+ \times 4+$ matings. Observed returns of females (solid bars) at ages 2-6 were 0, 59, 170, 4, and 1, respectively, for $2 \times 4+$ matings and 0, 34, 184, 71, and 2, respectively, for $4+ \times 4+$ matings.

Changing fish population structure to younger, smaller fish can lead to decreased reproductive potential, lower reproductive rates, loss of yield, increased variability in abundance, and fishery collapse.³⁶

reduction in average ages and lengths (Ricker 1981). Altering the structure of a fish population toward smaller younger fish can lead to decreased fecundity (Walsh et al. 2006), lowered reproductive rates (Venturelli et al. 2009), loss of yield (Conover and Munch 2002), increased variability in abundance (Hsieh et al. 2006), and ultimately fishery collapse (Olsen et al. 2004). The consideration of the effects of a fishery on adult Chinook salmon can be complicated by a complex population structure (Ricker 1980), environmental variability affecting fish growth and survival (Kendall and Quinn 2011), or a naturally skewed life-history population structure. Nonetheless, adult Chinook salmon returning to the Funny River display a dissimilar population structure from other Southcentral Alaska Chinook salmon populations, and appear to be heavily skewed towards smaller younger fish (Table 1; Figure 5; Roni and Quinn 1995), a classic sign of over exploitation (Ricker 1981).

³⁶ Boersma, J., "Abundance and Run Timing of Adult Chinook Salmon and Steelhead in the Funny River, Kenai Peninsula, Alaska," 2013. Fisheries Data Series No. 2013-4 pg 12



The energy budget required for metabolic changes necessary for living in fresh water, migration, and spawning for Kings is visibly observable in changes in color and teeth during this phase.

CONTRIBUTING CAUSES OF DECLINE

Overfishing and targeting the largest, most productive trophy Kings. Targeting large Kings contributes to "fisheries induced genetic selection" for younger, smaller, less productive returns.³⁷

"Fisheries Induced Genetic Selection"

³⁷ "Fisheries Induced Genetic Selection," a summary of research related to fisheries induced genetic selection-related research with Chinook and other species:
https://www.youtube.com/watch?v=ousioCKX_U4.



ADF&G Sportfish Division continues to sponsor a trophy (more than 55 inches total length), catch-and-keep King fishing contest even when other conservation measures are being taken.^{38 39}

ADF&G Sportfish Division endorses a "slot limit hook-and-release policy" (42-55 inches) that invites more hook-and-release mortality even on years like 2013 when early-run minimum thresholds had not be reached.^{38 39}

The slot limit policy combined with the trophy fishing contest encourages hook-and-keep retention of all the Kenai River's largest, most productive Kings (more than 55 inches long).

ADF&G Trophy Fish Program

Begich, pg 10

If the [early-run] spawning escapement is projected to be less than 5,300 fish [lower threshold of the Optimum Escapement Goal], ADF&G can implement trophy fishing provisions that prohibit the retention of Chinook salmon less than 55 inches in total length [allowing catch-and-keep retention of Kings longer than 55 inches], or close the Kenai River to retention of all Chinook salmon. Additionally, the plan contains options that enable fishery managers to protect early-run Chinook salmon in the mainstem of the Kenai River. These include restricting the use of bait and prohibiting the retention of Chinook salmon greater than 20 inches but less than 55 inches in total length upstream of the Sterling Highway Bridge, from July 1 through July 14.

Begich, pg 14:

Because the low [2013] forecast indicated the early-run could sustain little harvest without jeopardizing achievement of the OEG, the department issued EO 2-KS-1-11-13 on May 9 restricting the early-run fishery to catch and release trophy fishing effective May 16. ... The preliminary inseason estimated escapement was approximately 2,033 early-run Chinook salmon (Table 7).

Begich, pg 18, late-run:

By July 23 the projected escapement had declined below the SEG and an EO (2-KS-1-43-13) was issued restricting the remainder of the river open to sport fishing for Chinook salmon to catch and release trophy fishing effective July 25 (Appendix A4).

Reimer, pg 43:

³⁸ Begich, R., "2010-2012 Annual Management Report and 2013 Recreational Fisheries Overview for Northern Kenai Peninsula: Fisheries under Consideration by the Alaska Board of Fisheries, 2014," 2013. Fishery Management Report No. 13.51 pg 10 (trophy fishing); pg 14 (2013 early-run)

³⁹ ADF&G, "Staff Comments to the Alaska Board of Fisheries," 2014. RIR.2a.2013.04 pg 44(slot limit)



In waters of the Kenai River open to king salmon sport fishing, early-run regulations allow for the harvest of 10 king salmon less than 20 inches per day, and harvest of one king salmon per day 20 inches or greater in length and less than 46 inches or 55 inches or greater in length. Any king salmon caught that is 46 inches or longer, but less than 55 inches, must be released unharmed. The non-retention slot limit is in effect from January 1–June 30 in the Kenai River from the mouth upstream to the Soldotna Bridge and from January 1–July 14 for those waters of the Kenai River from the Soldotna Bridge upstream to the outlet of Skilak Lake.

Continued next page ...

Reimer, pg 44 [The 46-55 inch slot was changed to 42-55 inches in 2014]:

If the spawning escapement is projected to be less than the lower the end of the OEG, the commissioner shall, by EO, restrict as necessary the taking of king salmon in the sport and guided sport fisheries in the Kenai River to achieve the OEG 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–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–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.

Reimer pg 44, slot limit background:



BACKGROUND: Prior to 2002, there was no slot limit in the Kenai River king salmon sport fishery; anglers were permitted to harvest king salmon regardless of the total length of the fish. However, the department, along with the public, recognized a decline in larger, older-aged king salmon returning to the Kenai River during the early run. Although the exact cause for the decline in older king salmon during the early run is not understood, the selective harvest or exploitation of larger, ocean-age-5 fish was the only practical factor that could be directly influenced by fishery managers. Therefore, at the department's request, the Alaska Board of Fisheries (board) adopted a slot limit harvest restriction in 2002 of 40–55 inches. This restriction almost completely eliminated the harvest potential of ocean-age-5 fish, allowed the retention of rare record-sized fish, and allowed harvest of younger, smaller fish.

Reimer pg 55:

In 2003, the board adjusted the slot limit to 44–55 inches based on a department-recommended slot limit of 45–55 inches to protect the larger, older, ocean-age-5 king salmon returning to the Kenai River during the early run. This slot limit allowed approximately 73% of the returning early-run stocks to be available for harvest. Within this slot limit, most (87%) of the ocean-age-5 fish were protected, as were about 40% of the ocean-age-4 fish in the run.

In 2008, the board relaxed the slot limit again to 46–55 inches to allow for more harvest during years of higher abundance, yet still protect ocean-age-5 king salmon. This slot limit made



In 1989, ADF&G estimated **5-day** mortality for fish hooked-and-released once was averaged 10.6% (13% males).⁴⁰

pg 1, Bendock 1992:

early-run and 220 late-run fish that were tagged during the study. The average mortality was 7.6% for all experiments combined, and ranged from 10.6% in 1989 to 4.0% in 1991. In all experiments, small males suffered the highest

pg 1, Bendock 1989:

were recorded for each of the late-run fish that were radio-tagged. Mortality was estimated to be 13 percent for males and 7 percent for females.

⁴⁰ Bendock, T., "Hook and Release Mortality of Chinook in the Kenai River Recreational Fishery," 1990. Fishery Data Series No. 90-16 pg 1, 41 (13% males, 7% females, 10.6% average 5-day mortality)

Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2 pg 1 (10.6% in 1989)



Although an average of 10.6% of the hooked-and-released Kings died within 5 days in the 1989 study, only 40% of Kings caught, tagged, and released actually spawned.⁴¹

pg 21, Bendock 1989:

Table 3. Numbers of radio-tagged chinook salmon in each classification of 5-day and ultimate fates during the late run, 1989.

Five-Day Fates		Ultimate Fates	
Survivor.....	63	Spawner.....	40
Mortality.....	9	Mortality.....	9
Sport Harvest.....	13	Sport Harvest.....	22
Set Net.....	6	Set Net.....	9
Tag Net.....	7	Tag Net.....	8
Education Net.....	1	Education Net.....	1
Unknown.....	1	Drop Outs.....	7
		Uplost.....	3
		Unknown.....	1
Total	100	Total	100

pg 37, Bendick 1989:

A total of 40 out of 100 radio-tagged fish were ultimately classified as spawners. The sample of spawning fish was comprised of 15 females and 25 males that ranged in length from 560 mm to 1,130 mm and averaged 910 mm. The

⁴¹ Bendock, T., "Hook and Release Mortality of Chinook in the Kenai River Recreational Fishery," 1990. Fishery Data Series No. 90-16 pg 21, 37 (40% spawn)



Over three years of study, the 1989-91 average early-run catch-and-release 5-day mortality was measured at 7.6%.⁴²

pg 1, Bendock 1992:

early-run and 220 late-run fish that were tagged during the study. The average mortality was 7.6% for all experiments combined, and ranged from 10.6% in 1989 to 4.0% in 1991. In all experiments, small males suffered the highest

⁴² Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2 pg 1 (7.6% average 5-day mortality, 1989-1991)

Out-migration. In 1989, in addition to 10.6% 5-day mortality, another 16% out-migrated from the Kenai river after catch-and-release, returning to the ocean where they were caught or otherwise disappeared.⁴³

pg 21, Bendock 1989 (9 Set Net + 7 "Drop Outs" = 16/100 = 16%):

Table 3. Numbers of radio-tagged chinook salmon in each classification of 5-day and ultimate fates during the late run, 1989.

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Education Net.....	1	Education Net.....	1
Unknown.....	1	Drop Outs.....	7
		Uplost.....	3
		Unknown.....	1
Total	100	Total	100

⁴³ Bendock, T., "Hook and Release Mortality of Chinook in the Kenai River Recreational Fishery," 1990. Fishery Data Series No. 90-16 pg 21 (16% out-migration)

A late-run 2010 tagging study resulted in 18% "drop-outs" or Kings that out-migrated the Kenai River after handling.⁴⁴

Reimer, pg 17:

Table 4.—Fate of radiotagged Kenai River Chinook salmon by tagging event, 2010.

Run	Fate	2010					
		RM 8.5. midriver		RM 8.5. tagging		Total	
		N	%	N	%	N	%
Early run	Drop-out	15	10%	2	3%	17	8%
	Regurgitate	23	16%	6	9%	29	13%
	Censor	51	35%	38	55%	89	41%
	Migrant	57	39%	23	33%	80	37%
	Total	146		69		215	
Late run	Drop-out	6	18%			6	18%
	Regurgitate	13	38%			13	38%
	Censor	9	26%			9	26%
	Migrant	6	18%			6	18%
	Total	34				34	
Totals	Drop-out	21	12%	2	3%	23	9%
	Regurgitate	36	20%	6	9%	42	17%
	Censor	60	33%	38	55%	98	39%
	Migrant	63	35%	23	33%	86	35%
	Grand total	180		69		249	

⁴⁴ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, a Report to the Alaska Board of Fisheries 2014," 2013. Regional Information Report No. 2A13-06, pg 17 (18% dropouts)



Effective hook-and-release mortality. Adding out-migration following catch-and-release to 5-day mortality amounts to a 1989 "effective mortality" of only once-caught-and-released Kings of up to 27%.

10.6% 5-day mortality (1989)
+ 16% out-migration ("drop-outs" in 1989)
26.6% rounds to 27%



Add twice-hooked-and-released mortality to "effective mortality." In the 1989 study, 57% of Kings twice-hooked-and- released did not survive to spawn.⁴⁵

Bendock, 1989, pg 41 (4/7 = 57%):

All of the chinook salmon used in this study were hooked and released at least once, and 22 of these fish (the sport harvested component) were angled at least twice. We confirmed additional hook and release events for 7 fish. One of these fish had tackle in its jaw from a previous event when we caught and tagged it, and the others were caught, released, and reported to us by recreational anglers. Three of these multiple recaptures survived to spawn, while one each of the remaining fish was a sport harvest, drop-out, set net, and tag net fate. A fish that was caught and radio-tagged on 27 July had

⁴⁵ Bendock, T., "Hook and Release Mortality of Chinook in the Kenai River Recreational Fishery," 1990. Fishery Data Series No. 90-16 pg 41 (twice-hooked 57% mortality)



According to ADF&G, in the related 1990 tagging study, Kings twice-hooked-and- released had half the survival rate and three times the river exodus, out-migration rate.⁴⁶

Bendock 1990, pg 48:

All of the chinook salmon used in this study were hooked and released at least once, and 43 of these fish (the sport harvested component) were hooked at least twice. Anglers reported additional hook-and-release events for 14 fish during the 2 years of study; thus, nearly 20% of the fish in this study were hooked multiple times. The proportion of fish in this group that spawned was half of the overall rate, while the proportion of drop outs was three times as high. Additional hooking events and subsequent injuries may explain the abrupt downstream movements we observed in some fish that had penetrated several kilometers upstream. Furthermore, as catch rates increase in the sport fishery, mortality may also increase due to cumulative injury from multiple hooking events.

⁴⁶ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. Fishery Data Series No. 91-39 pg 48 (twice-hooked and more)

Disproportionate fishing pressure. Because the Kenai River downstream of the Soldotna Bridge is the most heavily utilized mainstem spawning area in both historical and recent ADF&G data, closures upstream of Slikok Creek have not conserved mainstem spawning Kings in proportion to abundance.⁴⁷

Reimer, RIR.2A.2013.06 pg 55:

just below Slikok Creek (RM 18.5). Because the Kenai River downstream of the Soldotna Bridge (RM 21) is the most heavily utilized mainstem spawning area in both historic and recent data (Table 2 and Tables 11–12), closures upstream of Slikok Creek have little conservation value for the largest spawning aggregate, and will fail to conserve mainstem spawning Chinook salmon in proportion to abundance. This situation is illustrated for 2012 and 2013 in Figure 20. During both seasons, conservation measures enacted downstream of Slikok Creek would more effectively conserve mainstem spawning Chinook salmon that spawn in all sections of the Kenai River drainage. Conservation measures enacted downstream of Slikok Creek are also applicable to more Chinook salmon because most use of the area upstream of Slikok Creek by fish we monitored did not occur until after the fishery closed (July 31) in both years (Figure 20).

⁴⁷ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, a Report to the Alaska Board of Fisheries 2014," 2013. Regional Information Report No. 2A13-06 pg 55 (proportion to abundance)



Exposure and stress. Motoring over and past spawning grounds and concentrated fishing pressure at "fishing holes" causes stress.



Long staging times averaging 33 days (up to 67)^{48 49} in the Kenai River mainstem adds exposure to Kenai River mainstem and tributary-spawning Kings.

Bendock, FMS 92-2 pg 41

The duration of time between tagging and death (stream life) was calculated for 282 fish that were judged to have spawned (Table 16). Mean stream life was 33 days (SE = 0.609) and ranged from 8 to 67 days. Stream life was significantly longer for tributary spawners (mean = 35.1 d, SE = 0.7428) and consequently for early-run fish, than for mainstem spawners (mean = 30.3 d, SE = 0.9846). Fish that spawned in Benjamin Creek had the longest stream life (41.5 d) and mainstem spawners had the shortest (30.5 d).

Reimer RIR No 2A13-06 pg 36:

early bound on the date when spawning could have begun. Chinook salmon with spawning destinations within the Kenai River mainstem began displaying site fidelity to their eventual spawning area as early as late June although in most years and river sections, no site fidelity was displayed until July. The median date for radiotagged Chinook salmon to begin displaying site fidelity to their eventual spawning area varied between 12 and 21 August for all years and river sections. All radiotagged Chinook salmon with a mainstem spawning destination displayed site fidelity to their eventual spawning area by early September. Site fidelity lasted for 6–63 days (median 14 days)⁸. Spawning is assumed to have occurred toward the end of each fish's site

⁴⁸ Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2, pg 41, 46

⁴⁹ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, A Report to the Alaska Board of Fisheries 2014." RIR No. 2A13-06 pg 36 (site fidelity up to 63 days)



From 2008-2010, the Kenai Watershed recorded at peak more than 700 outboard motor boats running the Kenai River below Skilak Lake simultaneously.⁵⁰

In recent years, the Kenai Watershed Forum (KWF) has documented more than 700 outboard motorboats in simultaneous operation on the lower 50 miles of the river.

⁵⁰ Kenai Watershed Forum, "Turbidity Monitoring on the Kenai River, 2008-2010," 2012.
http://dec.alaska.gov/water/wnpspc/protection_restoration/KenaiRiverWQ/pdfs/KWF_KENAI_RIVER_TURBIDITY_REPORT.pdf pg 5



EAST SIDE SETNET EFFECT

Early-run. The Kenai-East Forelands section (Kenai River area and north) of East Side Setnetters has not fished the early-run at all in 30 years (1985)⁵¹. Their season doesn't start until July 8 at the earliest.⁵²

pg 267:

From 1973–1983, all of the Upper Subdistrict set gillnet fishery opened on June 25. In 1984, that area of beach north of Kasilof River opened on July 10, with an earlier opening based on an escapement trigger. From 1985–1996, the Kenai and East Foreland sections (Figure 118-1) opened on or after July 1, with an escapement trigger for an opening as early as June 25. From 1997–2013, the Kenai and East Foreland sections set gillnet fishery has opened on or after July 8.

Eskelin, pg 8:

ESSN commercial harvests are reported for 7 statistical areas: Ninilchik Beach (244-22), Cohoe Beach (244-22), South K-Beach (244-31), North K-Beach (244-32), Salmatof Beach (244-41), East Forelands (244-42), and Kasilof River special harvest area (KRSHA) (244-25) (Figure 2). The Kasilof Section is composed of Ninilchik Beach, Cohoe Beach, and South K-Beach. The Kenai Section is composed of North K-Beach and Salmatof Beach. The East Forelands statistical area is its own section, but was grouped with the Kenai Section in this study. KRSHA is not commonly opened for fishing but has been opened at times to concentrate harvest of Kasilof River sockeye salmon while minimizing harvest of other stocks. The Kasilof Section opens the first Monday or Thursday on or after 25 June but can open as early as 20 June if ADF&G estimates that 50,000 sockeye salmon are in the Kasilof River before 25 June (Alaska Administrative Code 5 AAC 21.310 b. 2.C.[i]). The Kenai and East Forelands sections do not open until the first Monday or Thursday on or after 8 July.

⁵¹ ADF&G, "Staff Comments to the Alaska Board of Fisheries," 2014. RIR.2a.2013.04 pg 267 (Kenai-East Forelands Section)

⁵² ADF&G, "Staff Comments to the Alaska Board of Fisheries," 2014. RIR.2a.2013.04 pg 267 (Kenai-East Forelands Section)



On years when Kasilof sockeye are running abundantly and early, the Kasilof section of the Eastside Setnet area sometimes will have fishing opportunity during last ten days of June.⁵³ ADF&G describes their catch of returning early-run Kings as “insignificant.”⁵⁴

Eskelin, pg 8:

ESSN commercial harvests are reported for 7 statistical areas: Ninilchik Beach (244-22), Cohoe Beach (244-22), South K-Beach (244-31), North K-Beach (244-32), Salamatof Beach (244-41), East Forelands (244-42), and Kasilof River special harvest area (KRSHA) (244-25) (Figure 2). The Kasilof Section is composed of Ninilchik Beach, Cohoe Beach, and South K-Beach. The Kenai Section is composed of North K-Beach and Salamatof Beach. The East Forelands statistical area is its own section, but was grouped with the Kenai Section in this study. KRSHA is not commonly opened for fishing but has been opened at times to concentrate harvest of Kasilof River sockeye salmon while minimizing harvest of other stocks. The Kasilof Section opens the first Monday or Thursday on or after 25 June but can open as early as 20 June if ADF&G estimates that 50,000 sockeye salmon are in the Kasilof River before 25 June (Alaska Administrative Code 5 AAC 21.310 b. 2.C.[i]). The Kenai and East Forelands sections do not open until the first Monday or Thursday on or after 8 July.

Begich, pg 7-8:

Kenaitze Indian Tribal Association’s educational fishery (Table 7). Commercial harvests of

early-run Chinook salmon are considered insignificant.

⁵³ Eskelin, T., “Mixed Stock Analysis and Age, Sex, and Length Composition of Chinook Salmon in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013,” 2013. Fishery Data Series No. 13.63 pg 8 (Kasilof opening)

⁵⁴ Begich, R., “2010-2012 Annual Management Report and 2013 Recreational Fisheries Overview for Northern Kenai Peninsula: Fisheries under Consideration by the Alaska Board of Fisheries, 2014,” 2013. Fishery Management Report No. 13-51, pg 7-8 (“insignificant”)



Genetic stock identification of Kenai tributary-bound Kings harvested by all Eastside Setnetters combined averaged .004 over the entire 2010-2013 seasons.⁵⁵

Eskelin, pg 35:

Harvest by Reporting Group

Proportions of harvest by reporting group were similar between years. *Kenai River mainstem* was the predominate reporting group, averaging 0.692 (range: 0.643 to 0.766) of the harvest each year, followed by *Kasilof River mainstem*, averaging 0.290 (range: 0.213 to 0.330) (Table 15). *Cook Inlet other* averaged 0.014 of the harvest (range: 0.002 to 0.020) and *Kenai River tributaries* averaged 0.004 of the harvest (range: 0.001 to 0.011) (Table 15).

⁵⁵ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition of Chinook Salmon in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13-63 pg 35 (.004 tributary spawners)



Eastside Setnetters objectively are neither the cause or nor a contributing factor to the decline of the early-run King fishery.

On any year, the only significant harvests of the early-run Kenai Kings are by in-river sportfishmen.

This is an obvious conclusion from the preceding statements.

Late-run. In 2013, all of the East Side Setnetters' late-run King harvest contributed .5% (½ percent) to the value of their sockeye salmon fishing harvest.⁵⁶

Shields, pg 6:

CHINOOK SALMON

The 2013 UCI harvest of 5,398 Chinook salmon was the fifth smallest since 1966 and was approximately 63% less than the previous 10-year (2003–2012) average annual harvest of 14,450 fish (Appendices A3, B1, and B6). The exvessel value for UCI Chinook salmon in 2013 was estimated at \$210,638 dollars, which represented approximately 0.5% of the total exvessel value for all salmon (Appendix B7).

Appendix B7.—Page 2 of 2

Year	Chinook	%	Sockeye	%	Coho	%	Pink	%	Chum	%	Total
1985	\$ 799,318	2.3%	\$ 27,497,929	80.0%	\$ 3,359,824	9.8%	\$ 57,412	0.2%	\$ 2,644,995	7.7%	\$ 34,359,478
1986	\$ 915,189	2.0%	\$ 38,683,950	83.3%	\$ 2,909,043	6.3%	\$ 724,367	1.6%	\$ 3,197,973	6.9%	\$ 46,430,522
1987	\$ 1,609,777	1.6%	\$ 95,915,522	94.9%	\$ 2,373,254	2.3%	\$ 84,439	0.1%	\$ 1,116,165	1.1%	\$ 101,099,156
1988	\$ 1,120,885	0.9%	\$ 111,537,736	91.3%	\$ 4,738,463	3.9%	\$ 650,931	0.5%	\$ 4,129,002	3.4%	\$ 122,177,017
1989	\$ 803,494	1.4%	\$ 56,194,753	95.0%	\$ 1,674,393	2.8%	\$ 86,012	0.1%	\$ 415,535	0.7%	\$ 59,174,188
1990	\$ 436,822	1.1%	\$ 35,804,485	88.0%	\$ 2,422,214	6.0%	\$ 512,591	1.3%	\$ 1,495,827	3.7%	\$ 40,671,938
1991	\$ 348,522	2.3%	\$ 12,249,200	80.4%	\$ 1,996,049	13.1%	\$ 5,478	0.0%	\$ 643,400	4.2%	\$ 15,242,649
1992	\$ 634,466	0.6%	\$ 96,026,864	96.0%	\$ 2,261,862	2.3%	\$ 404,772	0.4%	\$ 740,294	0.7%	\$ 100,068,258
1993	\$ 617,092	2.1%	\$ 27,969,409	93.1%	\$ 1,081,175	3.6%	\$ 36,935	0.1%	\$ 322,205	1.1%	\$ 30,026,815
1994	\$ 642,291	1.9%	\$ 29,441,442	85.5%	\$ 3,297,865	9.6%	\$ 240,545	0.7%	\$ 831,121	2.4%	\$ 34,453,264
1995	\$ 474,475	2.2%	\$ 19,168,077	87.1%	\$ 1,295,353	5.9%	\$ 53,114	0.2%	\$ 1,023,926	4.7%	\$ 22,014,944
1996	\$ 402,980	1.4%	\$ 28,238,578	95.0%	\$ 800,423	2.7%	\$ 44,386	0.1%	\$ 225,751	0.8%	\$ 29,712,117
1997	\$ 365,316	1.1%	\$ 31,439,536	97.1%	\$ 434,327	1.3%	\$ 12,004	0.0%	\$ 143,244	0.4%	\$ 32,394,427
1998	\$ 181,318	2.1%	\$ 7,686,993	88.5%	\$ 497,050	5.7%	\$ 187,759	2.2%	\$ 132,025	1.5%	\$ 8,685,145
1999	\$ 337,482	1.6%	\$ 20,095,838	95.5%	\$ 329,164	1.6%	\$ 5,995	0.0%	\$ 265,026	1.3%	\$ 21,033,505
2000	\$ 183,368	2.2%	\$ 7,115,614	87.2%	\$ 626,287	7.7%	\$ 47,065	0.6%	\$ 186,385	2.3%	\$ 8,158,719
2001	\$ 169,634	2.2%	\$ 7,136,593	92.3%	\$ 297,328	3.8%	\$ 20,317	0.3%	\$ 111,093	1.4%	\$ 7,734,965
2002	\$ 326,051	2.8%	\$ 10,682,051	91.7%	\$ 329,031	2.8%	\$ 84,922	0.7%	\$ 224,148	1.9%	\$ 11,646,203
2003	\$ 358,940	2.8%	\$ 12,284,753	95.3%	\$ 132,079	1.0%	\$ 8,660	0.1%	\$ 99,850	0.8%	\$ 12,884,282
2004	\$ 662,550	3.2%	\$ 19,407,784	93.8%	\$ 416,196	2.0%	\$ 65,861	0.3%	\$ 129,795	0.6%	\$ 20,682,185
2005	\$ 688,908	2.2%	\$ 30,159,190	95.2%	\$ 708,793	2.2%	\$ 12,783	0.0%	\$ 101,123	0.3%	\$ 31,670,797
2006	\$ 617,133	4.4%	\$ 12,301,215	88.5%	\$ 679,754	4.9%	\$ 174,576	1.3%	\$ 121,343	0.9%	\$ 13,894,021
2007	\$ 629,521	2.7%	\$ 21,905,667	93.6%	\$ 683,110	2.9%	\$ 53,074	0.2%	\$ 141,156	0.6%	\$ 23,412,528
2008	\$ 544,120	3.3%	\$ 15,525,621	93.0%	\$ 482,608	2.9%	\$ 64,529	0.4%	\$ 75,774	0.5%	\$ 16,692,652
2009	\$ 266,548	1.8%	\$ 13,720,261	94.1%	\$ 399,704	2.7%	\$ 71,582	0.5%	\$ 115,899	0.8%	\$ 14,573,994
2010	\$ 349,102	1.0%	\$ 32,112,265	93.1%	\$ 943,909	2.7%	\$ 235,990	0.7%	\$ 837,590	2.4%	\$ 34,478,856
2011	\$ 634,617	1.2%	\$ 51,359,744	96.7%	\$ 406,677	0.8%	\$ 27,511	0.1%	\$ 688,876	1.3%	\$ 53,117,425
2012	\$ 121,652	0.4%	\$ 31,964,791	92.2%	\$ 480,488	1.4%	\$ 624,565	1.8%	\$ 1,458,716	4.2%	\$ 34,650,212
2013	\$ 210,638	0.5%	\$ 37,787,069	93.9%	\$ 1,362,395	3.4%	\$ 53,754	0.1%	\$ 828,113	2.1%	\$ 40,241,970

⁵⁶ Shields, P., "Upper Cook Inlet Commercial Fisheries Annual Management Report, 2013," 2013. Fishery Management Report No. 13-49 pg 6 (Kings = .5% total exvessel value)

Of the total King harvest by Eastside Setnet fishermen, 31.3% were bound for river systems other than the Kenai River according to a four-year genetic stock identification study.^{57 58}

68.7% of the Kings caught by Eastside Setnetters were bound for the Kenai corresponds to 31.3% bound for other river systems.

Fleischman 13-02, pg 5:

Stock composition of fish harvested in the Upper Subdistrict Set Gillnet fishery ("eastside setnet fishery") was estimated by GSI in 2010 and 2011 (Appendix B). Estimates of the proportion of Kenai River fish in the harvest (0.647 in 2010; 0.727 in 2011) were applied to eastside setnet harvests for those years. The 2010–2011 average (0.687) was applied to eastside setnet fishery harvests for the years 1986–2009 and 2012.

Average Kenai River Kings caught by Eastside setnetters = .692(mainstem) + .004(tributaries) = .696 Kenai-bound fraction of ESSN King harvest

Eskelin, pg 35:

Harvest by Reporting Group

Proportions of harvest by reporting group were similar between years. *Kenai River mainstem* was the predominate reporting group, averaging 0.692 (range: 0.643 to 0.766) of the harvest each year, followed by *Kasilof River mainstem*, averaging 0.290 (range: 0.213 to 0.330) (Table 15). *Cook Inlet other* averaged 0.014 of the harvest (range: 0.002 to 0.020) and *Kenai River tributaries* averaged 0.004 of the harvest (range: 0.001 to 0.011) (Table 15).

Table 15.—Proportions of ESSN Chinook salmon harvested by reporting group, 2010, 2011, and 2013.

Reporting Group	2010		2011		2013		Average
	Proportion	SD	Proportion	SD	Proportion	SD	
Kenai River tributaries	0.011	0.010	0.001	0.004	0.001	0.004	0.004
Kenai River mainstem	0.643	0.037	0.667	0.040	0.766	0.023	0.692
Kasilof River mainstem	0.326	0.034	0.330	0.040	0.213	0.022	0.290
Cook Inlet other	0.020	0.014	0.002	0.004	0.019	0.006	0.014

⁵⁷ Fleischman, S., "Run Reconstruction, Spawner-Recruit Analysis, and Escapement Goal Recommendation for Late-Run Chinook Salmon in the Kenai River," 2013. Fishery Manuscript Series No. 13-02 pg 5 (.687 factor)

⁵⁸ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition of Chinook Salmon in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13-63 pg 35 (Kenai River King fraction)

According to a genetic stock identification study, in 2013, East Side Setnetters' catch of late-run Kings 5 years old and older (large enough to be counted by the Didson counter inriver⁵⁹) was 3.5% of the total run.⁶⁰ 5 year-olds and 6 year-olds are of average size (30"); large enough to be counted by the Didson counter. The Hammarstrom study maps those age-length correlations for late-run Kenai Kings.

Eskelin, pg 34: $.687 (\text{kenai-bound }^{57\ 58}) \times (455 (1.3 = 5\text{yr-olds}) + 557 (1.4 = 6\text{ yr-olds})) / 19,711 (\text{total run size } ^1) = .0352 = 3.5\%$

Table 14.—Age, sex, and length composition of Chinook salmon harvested in the Eastside set gillnet Chinook Salmon fishery, Upper Cook Inlet, Alaska, 2013.

Sex	Parameter	Age Class				All ages
		1.1	1.2	1.3	1.4	
Females						
	Harvest by age			146	227	373
	SE (harvest by age)			24	29	35
	Samples by age			29	44	73
	Age composition			4.9%	7.6%	12.5%
	SE (age composition)			0.8%	1.0%	1.2%
	Mean length (mm)			839	959	911
	SE (mean length)			10	17	9
Males						
	Harvest by age	678	1,298	309	331	2,615
	SE (harvest by age)	42	51	33	34	35
	Samples by age	167	286	66	72	591
	Age composition	22.7%	43.4%	10.3%	11.1%	87.5%
	SE (age composition)	1.4%	1.7%	1.1%	1.1%	1.2%
	Mean length (mm)	414	589	867	1012	622
	SE (mean length)	3	3	9	8	8
Both Sexes						
	Harvest by age	678	1,298	455	557	2,988
	SE (harvest by age)	42	51	38	42	
	Samples by age	167	286	95	116	664
	Age composition	22.7%	43.4%	15.2%	18.6%	100.0%
	SE (age composition)	1.4%	1.7%	1.3%	1.4%	
	Mean length (mm)	451	589	832	986	658
	SE (mean length)	3	3	7	6	8

Note: Values given by age and sex may not sum to totals due to rounding.

Continued on next page...

⁵⁹ Hammerstrom, S., "Annual Performance Report for Kenai Peninsula Chinook and Coho Salmon," 1984. Fredf-10-1(27)S32-1,2,4,5 pg 72 (table 13, age/weight/length data from 1985) Mean length of 4 yr-olds was 26.4 inches. Mean length of 5 year-olds was 33.9 inches.

⁶⁰ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13-63 pg 34 (age sex composition 2013)



Mean length in the Hammarstrom table 13 below are translated to inches in the following table. Didson counter counts fish 30" and greater in length. This study allows mapping length to age.

Table 13. Summarized Age/Weight/Length Data from Readable Scales Collected from Chinook Salmon Taken in the Recreational Fishery on the Kenai River, 1985.

Age Class Brood Year	1.2 1981	1.3 1980	1.4 1979	1.5 1978	Other	Total
Early Run						
Number	18	39	225	12	0	294
Percent	6.1	13.3	76.5	4.1	0.0	100.0
Length (mm)*						
Range	435-700	660-990	790-1,190	950-1,210		435-1,340
Mean	619	851	981	1,093		946
S.D.	64.3	64.0	80.2	152.5		
Weight (kg)						
Range	2.7-7.3	6.2-16.5	14.7-30.0	12.7-35.8		2.7-35.8
Mean	4.9	11.7	17.5	23.1		16.2
S.D.	1.4	2.6	4.7	9.4		
Late Run						
Number	18	59	339	37	8	1
Percent	3.9	12.8	73.5	8.0	1.7	100.0
Length (mm)*						
Range	530-770	680-1,050	830-1,260	850-1,320	380-1,230	380-1,320
Mean	659	885	1040	1087	776	1004
S.D.	56.0	78.5	79.1	100.0	366.5	
Weight (kg)						
Range	2.3-8.2	7.0-19.1	7.8-34.1	11.8-36.4	0.8-26.8	0.8-36.4
Mean	5.6	13.3	20.7	24.4	15.1	19.4
S.D.	1.7	3.0	4.9	6.8	14.8	

* Lengths are mid-eye to fork of tail.
S.D. = Standard Deviation

From Hammarstrom table 13, mean length of 4 yr-olds was 26.4 inches and 5 yr-olds was 33.9 inches.

1984 Age-Length Correlation in Kings (Mid-eye to tail-fork lengths)	
EARLY RUN:	LATE RUN:
420 mm = 16.5" 4 yr-old (1:2)	560 mm = 22" 4 yr-old (1:2)
690 mm = 27" 4 yr-old (1:2)	780 mm = 31" 4 yr-old (1:2)
Mean Length = 22"	Mean Length = 26.4"
Mean Weight = 7.7lbs	Mean Weight = 13lbs
660 mm = 26" 5 yr-old (1:3)	670 mm = 26" 5 yr-old (1:3)
990 mm = 39" 5 yr-old (1:3)	1,010 mm = 40" 5 yr-old (1:3)
Mean Length = 31.3"	Mean Length = 33.9"
Mean Weight = 21.2lbs	Mean Weight = 27.3lbs
790 mm = 31" 6 yr-old (1:4)	810 mm = 32" 6 yr-old (1:4)
1,190 mm = 47" 6 yr-old (1:4)	1,220 mm = 48" 6 yr-old (1:4)
Mean Length = 39.1"	Mean Length = 41.7"
Mean Weight = 40.1lbs	Mean Weight = 48.7"
950 mm = 37" 7 yr-old (1:5)	970 mm = 38" 7 yr-old (1:5)
1,210 mm = 47.6" 7 yr-old (1:5)	1,295 mm = 51" 7 yr-old (1:5)
Mean Length = 42.2"	Mean Length = 44.4"
Mean Weight = 48.7lbs	Mean Weight = 56.7lbs



Total run size = 19,711 ¹:

From: Begich, R. "2010-2012 Annual Management Report and Recreational Fisheries Overview...", 2014.
Fishery Management Report No. 13-51, pg 100 (run strengths)

Table 8.-Late-run Kenai River Chinook salmon population data, 1986-2013.

Year	Deep Creek Marine Harvest ^a	Eastside Setnet Harvest ^b	Drift Gillnet Harvest ^c	Comm & PU ^d	Kenaitze Educational	Sub ^e	PU Dipnet ^f	Sport Harvest Below Sonar ^g	Inver Run Estimated by Sonar ^h	Sport Harvest Above Sonar ^g	Catch-and- Release Mortality ⁱ	Spawning Escapement	Total Run	Harvest Rate
1986	378	13,619	1,100	ND	ND	ND	ND	ND	62,740	9,872	316	52,552	77,837	0.325
1987	731	14,536	2,731	ND	ND	ND	235	ND	63,550	13,100	123	50,327	81,783	0.385
1988	892	8,834	1,330	ND	ND	ND	0	ND	61,760	19,695	176	41,889	72,816	0.425
1989	821	7,498	0	ND	ND	22	0	ND	36,370	9,691	88	26,591	44,711	0.405
1990	963	2,843	373	91	ND	13	ND	ND	34,200	6,897	69	27,234	38,483	0.292
1991	1,023	3,361	145	130	ND	288	ND	ND	38,940	7,903	16	31,021	43,887	0.293
1992	1,269	7,363	326	50	ND	402	0	ND	42,290	7,556	234	34,500	51,700	0.333
1993	1,700	9,672	451	81	ND	27	0	ND	50,210	17,775	478	31,957	62,142	0.486
1994	1,121	10,700	276	9	1	392	ND	ND	47,440	17,837	572	29,031	59,939	0.510
1995	1,241	8,291	314	25	3	ND	712	ND	44,770	12,609	472	31,689	55,355	0.428
1996	1,223	7,944	219	31	1	ND	295	ND	42,790	8,112	337	34,341	52,503	0.346
1997	1,759	7,780	293	30	20	ND	364	ND	41,120	12,755	570	27,795	51,367	0.459
1998	1,070	3,495	199	35	2	ND	254	ND	47,110	7,515	595	39,000	52,165	0.252
1999	602	6,501	345	59	4	ND	488	1,170	43,670	12,425	682	30,563	52,839	0.422
2000	631	2,531	162	27	6	ND	410	831	47,440	14,391	499	32,550	52,038	0.374
2001	552	4,128	371	80	8	ND	638	1,336	53,610	15,144	825	37,641	60,724	0.380
2002	256	6,511	249	15	6	ND	606	1,929	56,800	10,678	665	45,457	66,372	0.315
2003	120	10,174	744	53	11	ND	1,016	823	85,110	16,120	1,803	67,187	98,052	0.315
2004	996	14,897	916	218	10	ND	792	2,386	79,690	14,988	1,019	63,683	99,905	0.363
2005	624	15,183	1,103	639	11	ND	997	2,287	77,440	15,927	1,267	60,246	98,284	0.387
2006	563	6,840	631	61	11	ND	1,034	3,322	62,270	12,490	830	48,950	74,732	0.345
2007	478	8,445	547	38	6	0	1,509	1,750	47,370	9,690	670	37,010	60,143	0.385
2008	310	5,203	392	23	15	0	1,362	1,011	42,840	10,128	370	32,342	51,156	0.368
2009	154	3,839	515	64	4	0	1,189	1,132	29,940	7,904	626	21,410	36,837	0.419
2010	335	4,567	323	32	21	0	865	445	23,250	6,762	264	16,224	29,839	0.456
2011	528	5,596	356	88	5	0	1,243	458	27,090	6,894	479	19,717	35,363	0.442
2012	30	484	115	41	0	0	40	2	27,910	101	95	27,714	28,622	0.032
2013 ^j	not avail	2,256	267	117	8	0	11	37	17,015	1,541	79	15,395	19,711	0.219
Avg (1986-2002)	955	7,389	523	51	6	191	308	1,317	47,930	11,997	395	35,538	57,451	0.379
Avg (2003-2013)	414	7,044	537	125	9	0	914	1,241	47,266	9,322	682	37,262	57,513	0.339
Avg (1986-2013)	754	7,253	528	85	8	88	586	1,261	47,669	10,946	508	36,215	57,475	0.363

-continued-



The Eastside Setnetter's catch of jack 3- and 4-year-old Kings was 6.9% of the total late-run.⁶¹ The sportfish daily limit on jack Kings less than 20 inches long is 10 per day.⁶²

Eskelin, pg 34:

$.687 \text{ (Kenai-bound fraction)} = (678 \text{ (3 year-olds)} + 1298 \text{ (4 year-olds)}) / 19,711 \text{ (total run)} = .0688 \text{ of the total Kenai River late-run} = 6.9\%$

Regs, pg 9

GENERAL REGULATIONS

Inclusive waters: The mainstem Kenai River from its mouth, denoted by a line from the green light tower on the north shore and an ADF&G marker on the south shore, upstream to and including Skilak Lake, except within a ½-mile radius of the upper Kenai River inlet (see page 65 for Upper Kenai River regulations).

The Fishing Season for all species is open year-round unless otherwise noted below.

KING SALMON

- **January 1–July 14:** No person may possess a king salmon that is filleted or disfigured to prevent measurement until the fish has been permanently offloaded from a boat or removed from the riverbank fishing site where the fish was hooked and taken from the water.
 - 20 inches or longer:
 - There is a combined annual limit of 5 king salmon 20 inches or longer from the waters of the following areas: Cook Inlet Salt Waters, West Cook Inlet, Susitna River Drainage, Knik Arm, Anchorage Bowl, Kenai River and Kenai Peninsula. Of these 5 total king salmon no more than 2 may be taken from the Kenai River.
 - **January 1–June 30:** King salmon 20 inches or longer but less than 28 inches in length are not included in this limit
 - A king salmon 20 inches or longer that is removed from salt or fresh water must be retained and becomes part of the bag limit of the person who originally hooked the fish. A person may not remove a king salmon 20 inches or longer from the water before releasing it.
- No person, after taking a king salmon 20 inches or longer from the Kenai River, may, on that same day, fish from a boat for any species of fish in the Kenai River downstream from Skilak Lake.
 - Anglers who keep a king salmon 20 inches or longer must immediately record that harvest. See page 6 for recording instructions.
 - All Kenai River king salmon 55 inches or longer must be sealed within 3 days of harvest by ADF&G staff in the Soldotna Office at 43961 Kalifornsky Beach Road, Soldotna, Alaska; (907) 262-9368.
 - **Kenai River mouth upstream to 300 yards below Slikok Creek:**
 - **January 1–June 30:** 1 per day, 1 in possession, must be less than 42 inches in length or longer than 55 inches.
 - **July 1–July 31:** 1 per day, 1 in possession.
 - **300 yards below Slikok Creek upstream to Skilak Lake:**
 - **January 1–July 14:** 1 per day, 1 in possession, must be less than 42 inches in length or longer than 55 inches.
 - **July 15–July 31:** 1 per day, 1 in possession.
 - **Skilak Lake:**
 - Closed to king salmon fishing.
 - Less than 20 inches:
 - 10 per day, 10 in possession, in combination with coho (in season), sockeye, chum, or pink salmon less than 16 inches in length (see table below).

⁶¹ Eskelin, T., "Mixed Stock Analysis and Age, Sex, and Length Composition in the Eastside Set Gillnet Fishery in Upper Cook Inlet, Alaska, 2010-2013," 2013. Fishery Data Series No. 13-63 pg 34 (age sex composition 2013)

⁶² ADF&G, "Kenai River Sport Fishing Regulations," 2014.

<http://www.adfg.alaska.gov/static/regulations/fishregulations/PDFs/southcentral/2015SCkenairiver.pdf>



Adding $3.5\% + 6.9\%$, Eastside Setnetters caught 10.4% of the late-run Kenai Kings in 2013.



Additional facts.

A fish that lived 1 complete year in fresh water and 2 complete years in the ocean will be age-classified as a "1.2," i.e., a "2-ocean" King.⁶³ The 1 fresh-water year is implied.⁶³

2.1. Nomenclature

In many documents, age and life history type are expressed as a group of numbers such as 4_2 (Gilbert and Rich format) or 1.2 (European format). These notations can be confusing and an attempt is made here to clarify what they represent.

In the Gilbert-Rich (G-R) format the large number **4** represents the age of the fish on its *next birthday* or the number of winters from its deposition in the gravel as an egg to the

time of sampling.⁵ The subscript number **2** represents the year in which the fish migrated to the ocean (i.e. it migrated as a one year-old in its second year of life). The subscript number can also be interpreted as the number of winters spent in freshwater from the egg stage. The 4_2 age format can also be expressed as 4sub2. To obtain the parental brood-year, simply subtract the first number from the sample year.

A 1.2 fish in the European format is the same as a 4_2 fish in the G-R format. Here, the number **1** represents the total number of complete years the fish spent in freshwater (or the number of winters *since hatching* the fish spent in fresh water), and the number **2** represents the total number of complete years spent in the ocean (or the number of winters the fish spent in the ocean). To obtain the parental brood-year, add 1 to the sum of the two numbers and subtract from the sample year.

⁶³ Fisheries and Oceans, "Information Document to Assist Development of a Fraser Chinook Management Plan," 2011. pg 2-3 (European age format, brood year)

Incorporating the same King's brood year, ADF&G Sportfish Division will call the same "1.2" King a "2-ocean" fish, or a "4 year-old."⁶⁴

time of sampling.⁵ The subscript number 2 represents the year in which the fish migrated to the ocean (i.e. it migrated as a one year-old in its second year of life). The subscript number can also be interpreted as the number of winters spent in freshwater from the egg stage. The 4_2 age format can also be expressed as 4sub2. To obtain the parental brood-year, simply subtract the first number from the sample year.

A 1.2 fish in the European format is the same as a 4_2 fish in the G-R format. Here, the number 1 represents the total number of complete years the fish spent in freshwater (or the number of winters *since hatching* the fish spent in fresh water), and the number 2 represents the total number of complete years spent in the ocean (or the number of winters the fish spent in the ocean). To obtain the parental brood-year, add 1 to the sum of the two numbers and subtract from the sample year.

⁶⁴ Fisheries and Oceans, "Information Document to Assist Development of a Fraser Chinook Management Plan," 2011. pg 2-3 (European age format, brood year)

Four years of in-river tagging studies from 2010-2013 showed only 1 King (of 332) tagged after June 30 to spawn in a Kenai tributary.⁶⁵

Reimer, pg 1:

spawning in the mainstem of the Kenai River. With the exception of 1 fish, all Chinook salmon radiotagged during the late run spawned in the mainstem of the Kenai River.

Reimer, pg 25, referring to 2011 and 2012:

to radiotagged fish throughout all sections of the Kenai River in both years (Table 14). No Chinook salmon radiotagged during July in either year spawned outside of the mainstem Kenai River.

Reimer, pg 16-19, $34 + 45 + 141 + 112 = 332$ late-run Kings tagged:

TAG DEPLOYMENTS AND FATES

2010

A total of 249 radio tags, 215 in the early run and 34 in the late run, were deployed near RM 8.5 between 16 May and 5 July 2010 (Table 4). The majority of those tags were deployed by the

2011

A total of 228 radio tags, 183 in the early run and 45 in the late run, were deployed near RM 8.5 between 16 May and 5 July 2011 (Table 5). Only 91 (40%) of these radio tags were assigned a spawning destination. The remaining tags were split between 15 drop-outs (7%), 62

2012

A total of 225 radio tags, 84 in the early run and 141 in the late run, were deployed near RM 8.5 between 16 May and 15 August 2012 (Table 6). Only 123 (55%) of these radio tags were

2013

A total of 157 radio tags, 45 in the early run and 112 in the late run, were deployed near RM 8.5 by the midriver tagging crew between 16 May and 15 August 2013 (Table 7). Only 89 (57%) of

⁶⁵ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, a Report to the Alaska Board of Fisheries 2014 pg 1, 16-19, 25 (1/332 = late-run tributary spawner)



This ratio was corroborated in 1990.⁶⁶

Bendock 1990, pg 41:

Late Run:

Mainstem destinations were selected for spawning by 69 (97%) out of 71 tagged fish. The remaining two fish (3%) spawned in Benjamin and Juneau creeks.

Bendock, 1990, pg 46:

chinook salmon in the Skagit River (Granstrand and Gibson 1980). Most (72%) early-run fish spawned in tributaries, while most (97%) late-run fish spawned in the mainstem. The selection of spawning destinations, peak spawning

⁶⁶ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. Fishery Data Series No. 91-39 pg 41, 46 (97%)



Because on average even tributary spawners mill in-river for 33 days up to 67 days,^{67 68} the Bendock 1991 catch-and-release mortality study estimated 70% of early-run Kings were judged available to in-river, sportfish harvest in July.⁶⁹

Bendock, FMS 92-2 pg 41:

The duration of time between tagging and death (stream life) was calculated for 282 fish that were judged to have spawned (Table 16). Mean stream life was 33 days (SE = 0.609) and ranged from 8 to 67 days. Stream life was significantly longer for tributary spawners (mean = 35.1 d, SE = 0.7428) and consequently for early-run fish, than for mainstem spawners (mean = 30.3 d, SE = 0.9846). Fish that spawned in Benjamin Creek had the longest stream life (41.5 d) and mainstem spawners had the shortest (30.5 d).

Reimer RIR No 2A13-06 pg 36:

early bound on the date when spawning could have begun. Chinook salmon with spawning destinations within the Kenai River mainstem began displaying site fidelity to their eventual spawning area as early as late June although in most years and river sections, no site fidelity was displayed until July. The median date for radiotagged Chinook salmon to begin displaying site fidelity to their eventual spawning area varied between 12 and 21 August for all years and river sections. All radiotagged Chinook salmon with a mainstem spawning destination displayed site fidelity to their eventual spawning area by early September. Site fidelity lasted for 6–63 days (median 14 days)⁸. Spawning is assumed to have occurred toward the end of each fish's site

Bendock, FDS 91-39, pg 37:

Management objectives for the chinook salmon fishery change on 1 July as late-run fish begin to enter the river. To escape the inriver recreational fishery, early-run chinook salmon must either enter tributary drainages or continue moving upstream beyond rkm 80 in the mainstem. Twenty-two percent of the radio-tagged early-run fish never exited the area open to sport fishing. On 2 July, 70% of the tagged early-run fish that were ultimately judged to be spawners remained available to harvest in the lower 80 km of mainstem and 33% were still vulnerable to harvest on 14 July. Thus, early-run salmon remain vulnerable to harvest throughout much of the late run.

⁶⁷ Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2, pg 41, 46

⁶⁸ Reimer, A., "Migratory Timing and Distribution of Kenai River Chinook Salmon, 2010-2013, A Report to the Alaska Board of Fisheries 2014." RIR No. 2A13-06 pg 36 (site fidelity up to 63 days)

⁶⁹ Bendock, T., "Hook-and-Release Mortality in the Kenai River Chinook Salmon Recreational Fishery," 1991. FDS 91-39

ADF&G currently assumes a 6.4% catch-and release mortality rate, averaging only the 1990-91 studies.⁷⁰

McKinley, pg 20

Release mortality is obtained by multiplying creel survey estimates of number of fish released by 0.064 (Bendock and Alexandersdottir 1992).

Fleischman, pg 5:

estimated with an onsite creel survey (Perschbacher 2012a-b). Some Chinook salmon that are hooked and then released by anglers subsequently die. Hook-and-release mortality rates for Kenai River Chinook salmon were estimated to be 6.4% by Bendock and Alexandersdottir (1991, 1992). This rate was applied to estimates of released fish from the onsite creel survey

⁷⁰ For example, McKinley, T., "Run Reconstruction, Spawner-Recruit Analysis, and Escapement Goal Recommendation for Early-Run Chinook Salmon in the Kenai River," 2013. Fishery Manuscript Series No. 13-03, pg 20 (.0064);

Fleischman, S., "Run Reconstruction, Spawner-Recruit Analysis, and Escapement Goal Recommendation for Late-Run Chinook Salmon in the Kenai River," 2013. Fishery Manuscript Series No. 13-02, pg 5 (6.4%)



While early-run Kings will stage for an average of 33 days (up to 67) in mainstem of the Kenai River, the 1989-1991 tagging studies showed that about 81% of the early-run Kings spawned in tributaries.⁷¹

pg 46: Early tributary Late mainstem

the Skagit River (Granstrand and Gibson 1980). Most (81%) early run fish spawned in tributaries, while most (96%) late run fish spawned in the mainstem Kenai River. The selection of spawning destinations, peak spawning periods,

⁷¹ Bendock, T., "Mortality and Movement Behavior of Hooked-and-Released Chinook Salmon in the Kenai River Recreational Fishery, 1989-1991," 1992. Fishery Manuscript No. 92-2 pg 46 (81%)



Members of the Alaska Board of Fish,

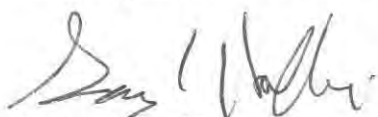
I authored proposal 140, which asks that if setnetters want to voluntarily fish 29 mesh deep gear that they be able to fish up to 45 fathom nets. The industry standard is up to 35 fathoms and 45 meshes deep. As stated in 140, a net of this length and depth has 17% less gear in the water.

The proposal is pretty self explanatory.

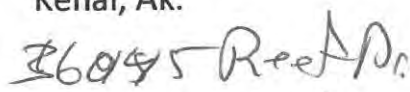
There will be a lot of discussion on the impacts of a 60 foot longer net when it comes to shore fishery leases and neighboring fish locations.

I have enclosed in this PC a copy of a shore fishery diagram that is located in Seward Meridian, 5N, 11W, Section 30. One of my locations is lease number 27002. It goes from Mean High Tide out to 1200 ft. This shore fishery lease and many others would have the ability to fish a net 60 ft longer and still keep the minimum 600 ft spatial distance from another set net.

The purpose of this proposal is to give fisherman an incentive to switch to 29 mesh gear, harvest more sockeye and less king salmon.


Gary L. Hollier

Kenai, Ak.


Kenai, AK
98644

2/1/2017

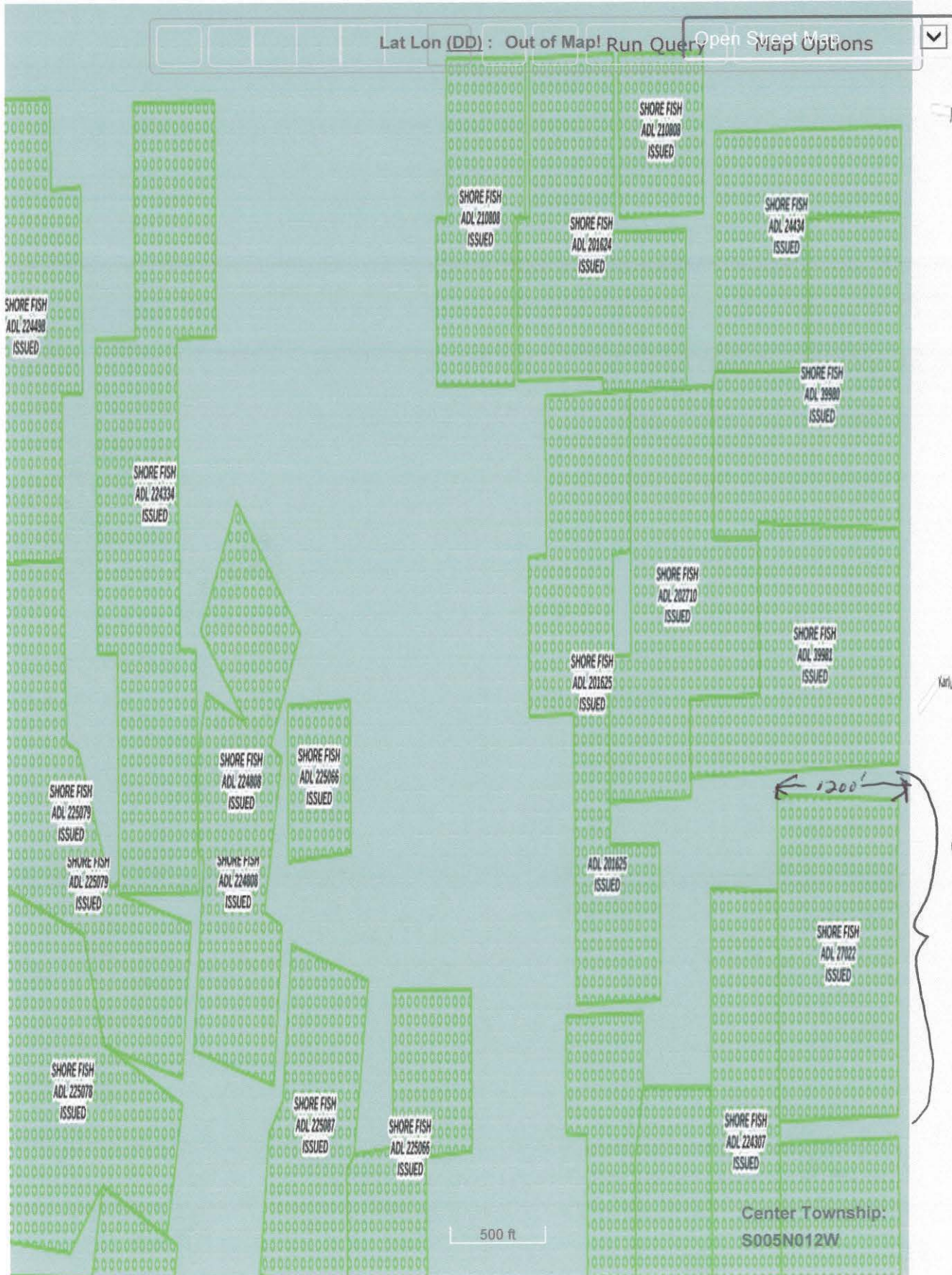
Proposal 140



State of Alaska

Alaska Mapper - Land Estate Map (public)

Logout (Logged in as guest)





Chairman Jenson and Members of the Alaska Board of Fish,

I authored proposal 136, asking to open North Kalifonsky Beach (NKB) statistical area 244-32.

136 is asking for ADF&G to may open NKB after July 8, with limited area (only out to 600 ft from MHT) and restricted gear (29 mesh deep gear with a mesh size 4 $\frac{3}{4}$ in or smaller), whenever the Kasilof section is open for Emergency Opener's to harvest Kasliof stocks.

I have enclosed a map of the Set Net Sections with 244-32 and South Kalifonsky Beach (SKB) statistical area's highlighted. Kalifonsky Beach is approximately 8 miles in length. The beach is split about in half with these two sections.

I have enclosed ADF&G documents that show the genetic harvests in the ESSN fishery. One chart shows in 2006 and 2008 over 50% of the harvest on NKB was Kasilof stocks. The other graph illustrates that in 2009 close to 50% of the harvest on NKB was of Kasilof origin.

I have enclosed harvests on Kalifonsky Beach from 1999-2016, from each section.

King salmon harvest on all K Beach was 51,403. NKB harvest of kings was 18,030 (35%). SKB harvest of kings was 33,373 (65%).

Red salmon harvest on all K Beach was 5,876,196. NKB harvest of reds was 2,127,955 (34%). SKB harvest of reds was 3,748,235 (64%).

Additionally enclosed is escapement data for sockeye into the Kasilof River. From 1999-2016 the two ocean and younger component (small fish under 500 mm) made up 61% of the escapement.

In the Kasilof River Special Harvest Area the harvest of the younger age classes and therefore smaller fish was 69% of the harvest.

From 2008-2015 in the Kasilof section (set net) the harvest of these smaller fish comprised 33% of the harvest. I believe that the harvest on SKB is of similar proportion.

SKB fishes on average twice as many days per year as NKB. SKB harvest is almost twice that of kings and reds as NKB. All this on a run's to the Kasilof River that are at best 30-35% of what the Kenai River red run is.

For many years SKB fished 50% of the Wednesday's in July before the regular schedule period on Thursday. Occasionally these EO's were extended thru the night right up to NKB opening up on Thursday. This management philosophy was and continues to be brutal on NKB fishermen.



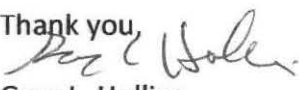
There are between 60 and 70 permits that register on NKB. On NKB there are 29 beach nets that fish from shore out to 1200 ft depending on the tides. These 29 beach nets are fished by 9 family operations. These 9 family operations hold 45 permits that fish NKB. 10 permits are fished on the beach and the remaining permits are fished off shore. If this proposal was to pass it would benefit 66% of ALL the fishing nets that are on NKB (244-32).

NKB was always a harvester of Kasilof stocks. These Kasilof reds are predominately beach orientated and when the prevailing winds blows from the SW are all over the beach.

Due to our proximity to the Kenai River and very vocal opposition from a few setnetters on SKB we have been limited on our ability to harvest these sometime very abundant Kasilof reds.

The Kasilof River has exceeded its BEG 88% of the time since 1999. From 1999-2016 the Kasilof escapement was comprised of 61% of two ocean and younger age class reds.

Proposal 136, fishing 29 mesh deep gear and 4 ¾ in mesh would have limited impact on King Salmon. NKB would be targeting smaller Kasilof fish, and could have a substantial positive economic impact for NKB fishers that have been shut out from this traditional fishery.

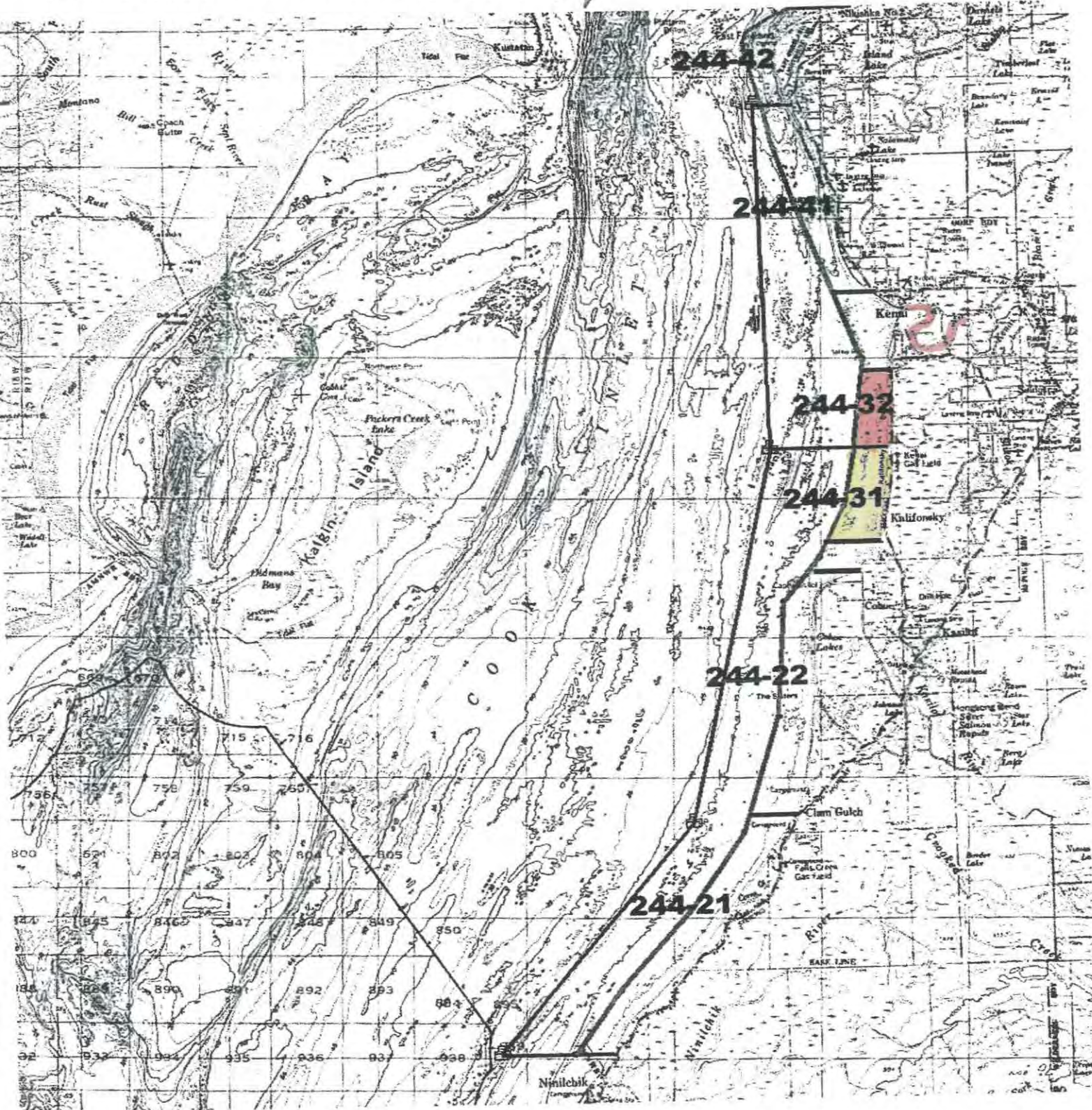
Thank you,

Gary L. Hollier

Kenai, Ak.

2/3/2017



Proposal 136 Beach Sections and Expanded Corridor



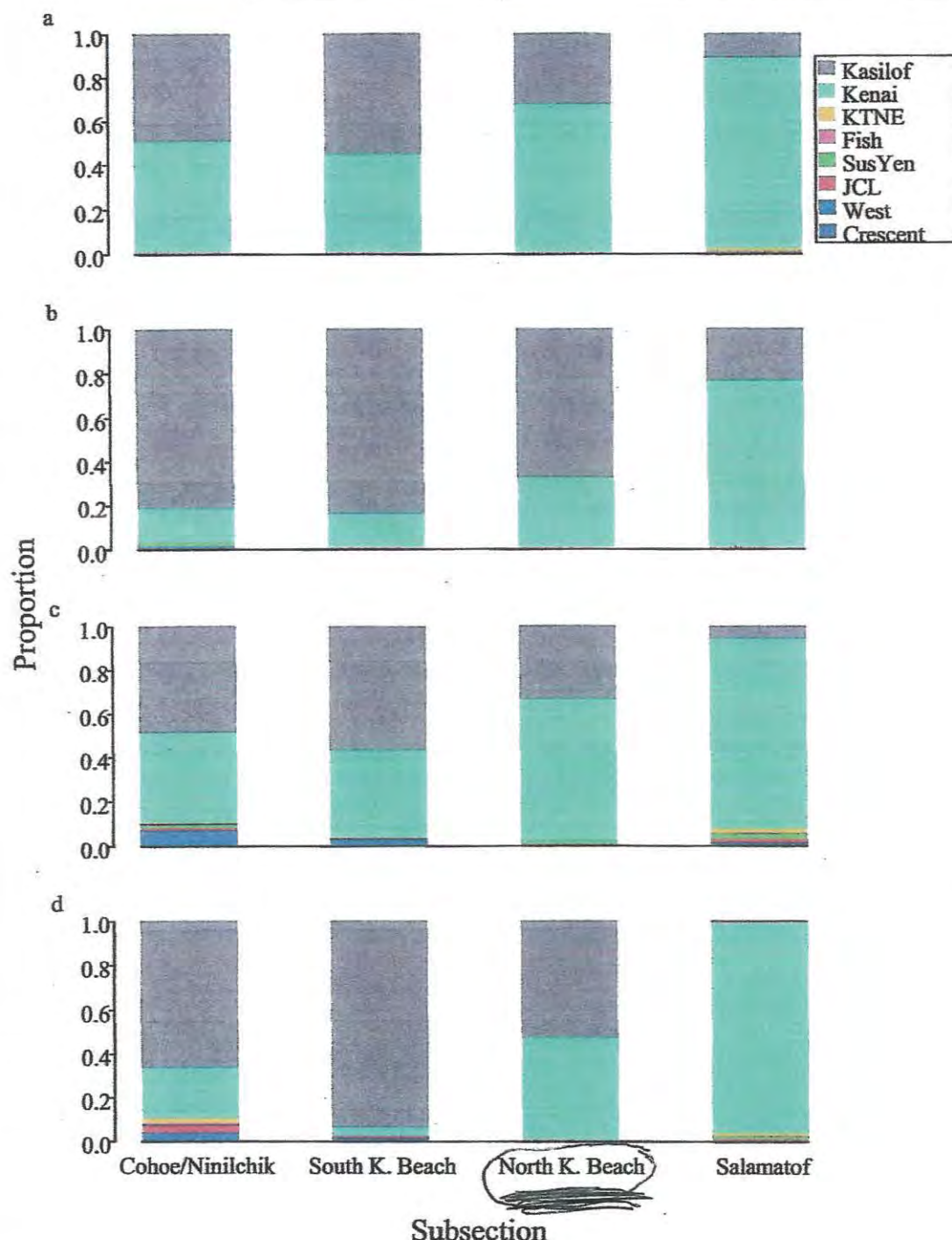
Upper Cook Inlet
Break down of statistical Areas for
Set-nets and The Expanded Corridor
North Kalifornsky Beach 244-32 // South Kalifornsky Beach 244-31

2005

2006

2007

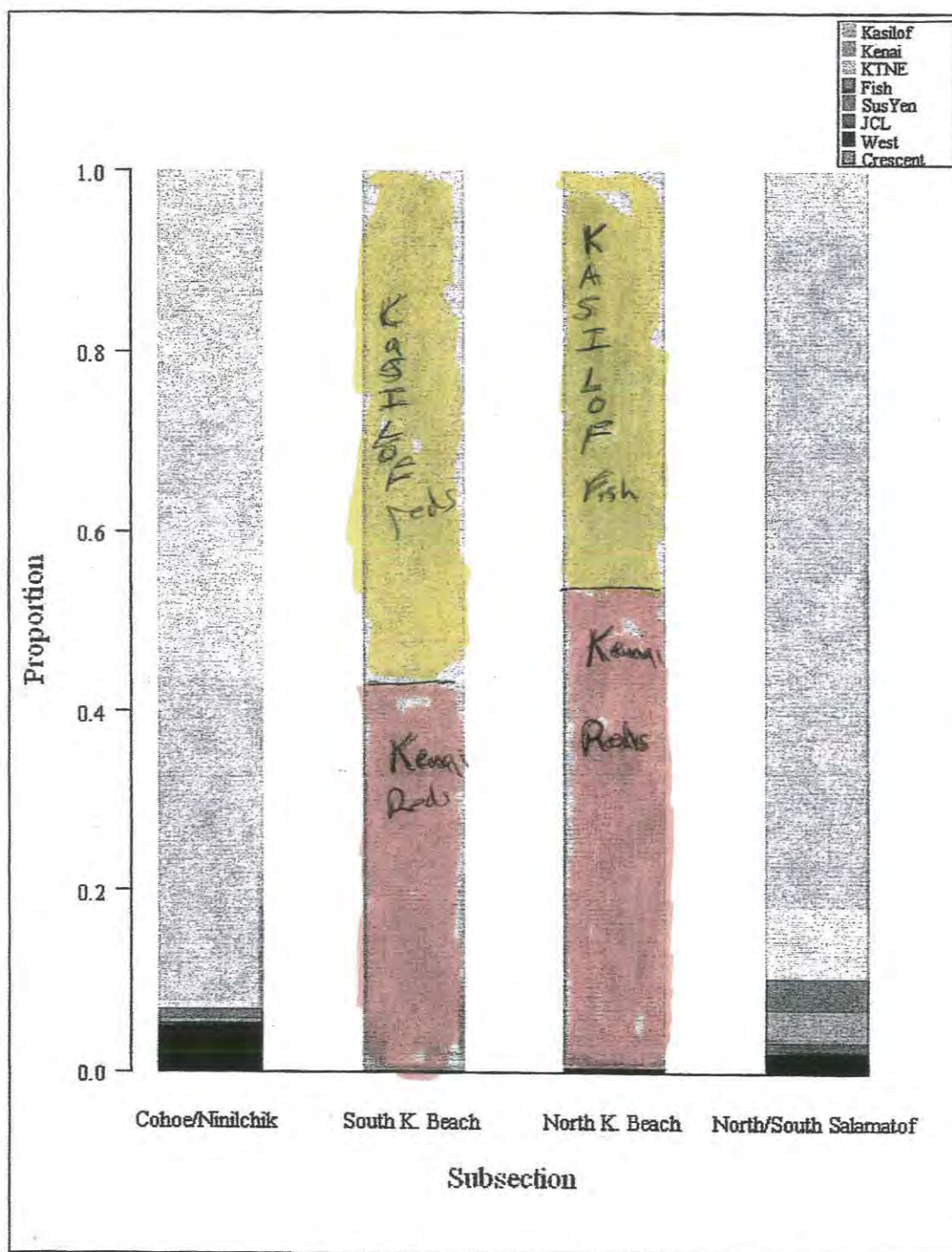
2008



Note: There are 2 subdistricts for each section and they are displayed from south to north.

Figure 10.—Stock composition estimates for the Kasilof and Kenai Section set gillnet fisheries (Central District, East Side Subdistrict) divided into subsection from a) 2005, b) 2006, c) 2007, and d) 2008.

In 2006 and 2008,¹⁰⁹ 50 % or higher of Kasilof sockeye, where harvested in the North K-Beach sections
Gary Hallier Proposal 136



Note: There are 2 subdistricts for each section and they are displayed from south to north.

Figure 6.-Stock composition estimates for the Kasilof and Kenai/EF sections set gillnet fisheries (Central District, Upper Subdistrict) divided into subsections from 2009.

In 2009 close to 50% of the North-K-Beach harvest⁵² was comprised of Kasilof Sockeye.

<http://www.bing.com/search?q=dancing+with+the+stars&form=MSNH14&qs=AS&sk=&...> 2/28/2011

Gail Hollier
Proposa V66

136



	410	2.5%	88.0%
12	378	2.1%	90.0%
	385	2.1%	92.2%
24	275	1.5%	93.7%
	293	1.6%	95.3%
15	361	2.0%	97.3%
	173	1.0%	98.3%
5	231	1.3%	99.6%
	55	0.3%	99.9%
	19	0.1%	100.0%
	2	0.0%	100.0%

18030 Kings salmon

1999-2016

North Kalitonsky Beach

244-32

18,030 Kings harvested

All of Kalitonsky
Beach harvested
51,403 King Salmon

18,030 - NKB 35%

51,403 - All KB each 100%

NKB harvested

35% of all

King salmon
harvest on all of
Kalitonsky Beach
from 1999-2016

2016	Total	Percent	Cum Percent
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	0	0.0%	0.0%
	13604	0.6%	0.6%
	18078	0.8%	1.5%
	18582	0.9%	2.4%
15,058	52229	2.5%	4.8%
	37973	1.8%	6.6%
6,020	109673	5.2%	11.8%
6,148	107212	5.0%	16.8%
	165131	7.8%	24.6%
6,556	173360	8.1%	32.7%
4,172	104763	4.9%	37.6%
8,016	155120	7.3%	44.9%
2,878	70857	3.3%	48.2%

Gary L. Hallor
Proposal 136



1999-2016

	80324	3.8%	52.0%
6,632	121430	5.7%	57.7%
	56127	2.6%	60.4%
2,749	99020	4.7%	65.0%
6,889	67765	3.2%	68.2%
4,644	66675	3.1%	71.3%
	81473	3.8%	75.2%
	56706	2.7%	77.8%
3,431	54181	2.5%	80.4%
	34330	1.6%	82.0%
	35530	1.7%	83.7%
	48296	2.3%	85.9%
3,785	51097	2.4%	88.3%
	36876	1.7%	90.1%
3,774	25829	1.2%	91.3%
	40602	1.9%	93.2%
2,719	31294	1.5%	94.7%
	29488	1.4%	96.0%
2,439	26418	1.2%	97.3%
	21128	1.0%	98.3%
813	19989	0.9%	99.2%
	11750	0.6%	99.8%
	4935	0.2%	100.0%
	110	0.0%	100.0%
	2127955		red salmon

North Kalitonsky Beach

244-32

2,127,955 reds harvest

The total harvest on all
Kalitonsky Beach was 5,876,196

2,127,955 - NKRB - 36%
5,876,196 All K Beach - 100%

NKRB harvested 36% of all
red salmon harvested on all
of Kalitonsky Beach 1999-2016

GARY L. HOLLER
Proposal 136

1,961	296822	7.9%	53.7%
2,489	197540	5.3%	59.0%
4,554	226423	6.0%	65.1%
2,351	90230	2.4%	67.5%
	129592	3.5%	70.9%
3,384	128583	3.4%	74.3%
	109669	2.9%	77.3%
1,925	98078	2.6%	79.9%
3,004	81300	2.2%	82.1%
1,772	98060	2.6%	84.7%
	78478	2.1%	86.8%
	67757	1.8%	88.6%
1,863	58276	1.6%	90.1%
	27095	0.7%	90.9%
	37321	1.0%	91.9%
	54437	1.5%	93.3%
2,033	45005	1.2%	94.5%
	30336	0.8%	95.3%
1,644	33026	0.9%	96.2%
	35577	0.9%	97.1%
1,905	21824	0.6%	97.7%
	25874	0.7%	98.4%
1,265	19700	0.5%	98.9%
	12158	0.3%	99.3%
375	15478	0.4%	99.7%
	10523	0.3%	100.0%
	1168	0.0%	100.0%
	292	0.0%	100.0%
	3748235		Red salmon

1799-201



There was a
total harvest on
all Kalifornsky
Beach of

5,876,196 reds
from 1999-2016

3,748,235-SKB 64%
5,876,196-AllKBeach 100%

South Kalifornsky Beach - 244-31

3,748,235 reds harvested 1999-2016

SKB harvested 64% of
all red salmon harvested
on All of Kalifornsky Beach
Gary L. Hollier
Proposal 136



	121	2.2%	83.4%
	1042	3.1%	86.5%
31	798	2.4%	88.9%
	545	1.6%	90.5%
9	445	1.3%	91.9%
	671	2.0%	93.9%
6	295	0.9%	94.8%
	472	1.4%	96.2%
12	547	1.6%	97.8%
	166	0.5%	98.3%
5	376	1.1%	99.4%
	140	0.4%	99.9%
	41	0.1%	100.0%
	3	0.0%	100.0%

33373 Kingsdon

1999-2016

South Kalitonsky Beach
294-31 SKB

33,373 ~~Beats~~ Kings Harvested

2016	Total	Percent	Cum Percent
	14037	0.4%	0.4%
	7477	0.2%	0.6%
	22386	0.6%	1.2%
5,381	18289	0.5%	1.7%
	4227	0.1%	1.8%
3,338	72947	1.9%	3.7%
	63604	1.7%	5.4%
3,100	58293	1.6%	7.0%
	71726	1.9%	8.9%
3,180	69028	1.8%	10.7%
3,263	92224	2.5%	13.2%
	61039	1.6%	14.8%
3,699	57373	1.5%	16.3%
	69224	1.8%	18.2%
6,380	88026	2.3%	20.5%
	44396	1.2%	21.7%
3,017	64850	1.7%	23.5%
2,548	52169	1.4%	24.8%
	53092	1.4%	26.3%
5,177	54575	1.5%	27.7%
	43250	1.2%	28.9%
7,845	49322	1.3%	30.2%
	92012	2.5%	32.6%
3,808	90278	2.4%	35.1%
3,718	150150	4.0%	39.1%
	253619	6.8%	45.8%

Gail L. Hallier
Proposal 136

From 1999-2016

there were 51,403
King salmon harvested
on all Kalitonsky Beach

33,373 - SKB 65%
51,403 - All KB 100%

SKB Harvested
65% of all

King Salmon
on Kalitonsky Beach
1999-2016



63

11/20 P02 P01 P03 P12 P01

2016	Kalifornsky	173880	0.0000	0.0000	0.0013	0.1460	0.0038
1972	Kasilof Escapement	115486	0.0000	0.0020	0.0000	0.4260	0.0010
1973	Kasilof Escapement	40880	0.0000	0.0000	0.0000	0.2050	0.0050
1974	Kasilof Escapement	71540	0.0000	0.0000	0.0000	0.3600	0.0040
1975	Kasilof Escapement	48884	0.0010	0.0090	0.0000	0.2830	0.0050
1976	Kasilof Escapement	142058	0.0000	0.0020	0.0000	0.3590	0.0000
1977	Kasilof Escapement	158410	0.0000	0.0030	0.0000	0.2940	0.0080
1978	Kasilof Escapement	119165	0.0000	0.0000	0.0000	0.4130	0.0000
1979	Kasilof Escapement	155527	0.0010	0.0070	0.0000	0.5890	0.0000
1980	Kasilof Escapement	188314	0.0000	0.0210	0.0000	0.6700	0.0000
1981	Kasilof Escapement	262271	0.0000	0.0000	0.0000	0.2890	0.0000
1982	Kasilof Escapement	184204	0.0000	0.0080	0.0000	0.3060	0.0020
1983	Kasilof Escapement	215730	0.0000	0.0000	0.0000	0.4951	0.0000
1984	Kasilof Escapement	238413	0.0000	0.0000	0.0000	0.5050	0.0020
1985	Kasilof Escapement	512827	0.0000	0.0020	0.0000	0.5740	0.0010
1986	Kasilof Escapement	283054	0.0012	0.0000	0.0000	0.4087	0.0008
1987	Kasilof Escapement	256707	0.0000	0.0024	0.0000	0.4335	0.0008
1988	Kasilof Escapement	204336	0.0000	0.0006	0.0000	0.3369	0.0011
1989	Kasilof Escapement	164952	0.0000	0.0000	0.0000	0.1493	0.0007
1990	Kasilof Escapement	147663	0.0000	0.0040	0.0006	0.3290	0.0000
1991	Kasilof Escapement	233646	0.0004	0.0000	0.0013	0.3154	0.0006
1992	Kasilof Escapement	188819	0.0000	0.0000	0.0000	0.2109	0.0019
1993	Kasilof Escapement	151801	0.0000	0.0035	0.0000	0.1629	0.0035
1994	Kasilof Escapement	218826	0.0000	0.0000	0.0000	0.2642	0.0000
1995	Kasilof Escapement	202428	0.0000	0.0017	0.0000	0.4395	0.0000
1996	Kasilof Escapement	264511	0.0000	0.0000	0.0000	0.2483	0.0000
1997	Kasilof Escapement	263780	0.0000	0.0000	0.0000	0.2111	0.0000
1998	Kasilof Escapement	259045	0.0012	0.0012	0.0000	0.3967	0.0058
1999	Kasilof Escapement <i>116,333</i>	312481	0.0000	0.0000	0.0000	<i>0.2967</i>	<i>0.0010</i>
2000	Kasilof Escapement <i>146,543</i>	263631	0.0000	0.0013	0.0000	0.4192	0.0039
2001	Kasilof Escapement <i>146,395</i>	318735	0.0000	0.0035	0.0000	0.2926	0.0018
2002	Kasilof Escapement <i>128,898</i>	235732	0.0000	0.0027	0.0000	0.3391	0.0147
2003	Kasilof Escapement <i>236,084</i>	353526	0.0000	0.0065	0.0000	0.3731	0.0022
2004	Kasilof Escapement <i>425,887</i>	523653	0.0007	0.0019	0.0000	0.4503	0.0019
2005	Kasilof Escapement <i>207,901</i>	360065	0.0000	0.0066	0.0000	0.3876	0.0029
2006	Kasilof Escapement <i>245,866</i>	389645	0.0000	0.0054	0.0000	0.3528	0.0041
2007	Kasilof Escapement <i>239,375</i>	365184	0.0000	0.0064	0.0000	0.4475	0.0016
2008	Kasilof Escapement <i>188,395</i>	327018	0.0000	0.0036	0.0000	0.3951	0.0018
2009	Kasilof Escapement <i>133,189</i>	326283	0.0000	0.0073	0.0000	0.1161	0.0218
2010	Kasilof Escapement <i>177,779</i>	295265	0.0021	0.0103	0.0000	0.2784	0.0144
2011	Kasilof Escapement <i>103,105</i>	245721	0.0000	0.0145	0.0000	0.1364	0.0269
2012	Kasilof Escapement <i>265,049</i>	374523	0.0000	0.0677	0.0000	0.3404	0.0444
2013	Kasilof Escapement <i>300,223</i>	489654	0.0019	0.0194	0.0000	0.3450	0.0116
2014	Kasilof Escapement <i>288,986</i>	440192	0.0038	0.0172	0.0000	0.4237	0.0267
2015	Kasilof Escapement <i>269,980</i>	470677	0.0019	0.0047	0.0000	0.2099	0.0104



	0.0000	0.4841	0.1455	0.0000	0.0041	0.2132	0.0005	0.0005	0.0010
	0.0000	0.3570	0.0310	0.0000	0.0060	0.1740	0.0000	0.0020	0.0010
	0.0000	0.5620	0.1840	0.0000	0.0000	0.0440	0.0000	0.0000	0.0000
	0.0000	0.5760	0.0440	0.0000	0.0000	0.0160	0.0000	0.0000	0.0000
	0.0000	0.0690	0.5900	0.0000	0.0000	0.0430	0.0000	0.0000	0.0000
	0.0000	0.2410	0.2820	0.0000	0.0000	0.1140	0.0000	0.0020	0.0000
	0.0000	0.3000	0.2780	0.0000	0.0000	0.1170	0.0000	0.0000	0.0000
	0.0000	0.4010	0.1040	0.0000	0.0000	0.0820	0.0000	0.0000	0.0000
	0.0000	0.2820	0.1050	0.0000	0.0000	0.0160	0.0000	0.0000	0.0000
	0.0000	0.2310	0.0500	0.0000	0.0010	0.0270	0.0000	0.0000	0.0000
	0.0000	0.6360	0.0590	0.0000	0.0000	0.0160	0.0000	0.0000	0.0000
	0.0000	0.5440	0.0930	0.0000	0.0000	0.0470	0.0000	0.0000	0.0000
	0.0000	0.3314	0.1286	0.0000	0.0000	0.0449	0.0000	0.0000	0.0000
	0.0000	0.2480	0.1790	0.0000	0.0000	0.0660	0.0000	0.0000	0.0000
	0.0000	0.2180	0.1780	0.0000	0.0010	0.0260	0.0000	0.0000	0.0000
	0.0000	0.4201	0.1191	0.0000	0.0032	0.0458	0.0000	0.0011	0.0000
	0.0000	0.2744	0.2239	0.0000	0.0000	0.0642	0.0008	0.0000	0.0000
	0.0000	0.3643	0.1751	0.0000	0.0016	0.1199	0.0000	0.0005	0.0000
	0.0000	0.3530	0.3662	0.0000	0.0006	0.1302	0.0000	0.0000	0.0000
	0.0000	0.2065	0.3317	0.0000	0.0026	0.1236	0.0020	0.0000	0.0000
	0.0000	0.3340	0.2895	0.0000	0.0009	0.0579	0.0000	0.0000	0.0000
	0.0000	0.2745	0.3531	0.0000	0.0000	0.1596	0.0000	0.0000	0.0000
	0.0000	0.2977	0.2802	0.0000	0.0000	0.2522	0.0000	0.0000	0.0000
	0.0000	0.2835	0.2822	0.0000	0.0000	0.1701	0.0000	0.0000	0.0000
	0.0000	0.1550	0.2505	0.0000	0.0000	0.1533	0.0000	0.0000	0.0000
	0.0000	0.4827	0.2136	0.0000	0.0000	0.0554	0.0000	0.0000	0.0000
	0.0000	0.5474	0.1346	0.0000	0.0000	0.1069	0.0000	0.0000	0.0000
	0.0000	0.2812	0.2217	0.0000	0.0035	0.0887	0.0000	0.0000	0.0000
1999	0.0000	0.3382	0.2666	0.0000	0.0021	0.0944	0.0010	0.0000	0.0000 5643
00	0.0000	0.3389	0.1138	0.0000	0.0000	0.1229	0.0000	0.0000	0.0000 5369
01	0.0000	0.4857	0.1649	0.0000	0.0018	0.0479	0.0018	0.0000	0.0000 4593
02	0.0000	0.3808	0.1930	0.0000	0.0027	0.0657	0.0000	0.0013	0.0000 5468
03	0.0000	0.2607	0.2925	0.0000	0.0000	0.0650	0.0000	0.0000	0.0000 6678
04	0.0000	0.1425	0.3611	0.0000	0.0006	0.0410	0.0000	0.0000	0.0000 8133
05	0.0000	0.3275	0.1869	0.0000	0.0000	0.0877	0.0008	0.0000	0.0000 5774
06	0.0000	0.3053	0.2741	0.0000	0.0000	0.0583	0.0000	0.0000	0.0000 631
07	0.0000	0.2531	0.1927	0.0000	0.0000	0.0987	0.0000	0.0000	0.0000 6918
08	0.0000	0.3832	0.1792	0.0000	0.0000	0.0371	0.0000	0.0000	0.0000 5261
09	0.0000	0.4538	0.2703	0.0000	0.0018	0.1289	0.0000	0.0000	0.0000 4882
10	0.0000	0.3175	0.3093	0.0000	0.0000	0.0680	0.0000	0.0000	0.0000 6021
11	0.0000	0.3076	0.2563	0.0000	0.0000	0.2583	0.0000	0.0000	0.0000 4186
12	0.0000	0.1057	0.3763	0.0000	0.0000	0.0655	0.0000	0.0000	0.0000 7611
17	0.0000	0.2674	0.3178	0.0000	0.0000	0.0369	0.0000	0.0000	0.0000 6744
17	0.0000	0.2939	0.2061	0.0000	0.0000	0.0286	0.0000	0.0000	0.0000 6565
15	0.0000	0.3485	0.3533	0.0000	0.0000	0.0712	0.0000	0.0000	0.0000 5736



✓	1.5	2.0	2.1	1.8	2.3	3.2	2.4	0
0.0000	0.2032	0.3924	0.0000	0.0015	0.0676	0.0013	0.0000	0
0.0000	0.1425	0.3611	0.0000	0.0006	0.0410	0.0000	0.0000	0.0000
0.0000	0.3275	0.1869	0.0000	0.0000	0.0877	0.0008	0.0000	0.0000
0.0000	0.2222	0.2185	0.0000	0.0022	0.0679	0.0007	0.0007	0.0000
0.0000	0.2531	0.1927	0.0000	0.0000	0.0987	0.0000	0.0000	0.0000
0.0000	0.2100	0.2092	0.0004	0.0012	0.0567	0.0000	0.0004	0.0000

23368

Terminal - 69.5%

Year	Kasilof Escapement	171,207	241083	0.0000	0.0159	0.0000	0.298	
2004	Kasilof Terminal	4,465	5476	0.0007	0.0019	0.0000	0.450	
2005	Kasilof Terminal	56,122	97199	0.0000	0.0066	0.0000	0.3876	0.0029
2006	Kasilof Terminal	486,580	687543	0.0006	0.0009	0.0000	0.4863	0.0000
2007	Kasilof Terminal	13,022	20290	0.0000	0.0064	0.0000	0.4475	0.0016
2008	Kasilof Terminal	56,837	77869	0.0014	0.0000	0.0000	0.5185	0.0022



All ADFEG Data

22902
5
11

0.003

145804 0.00172

Kasilof River - Escapement

6,333,068 - Total Escapement Kasilof River 1999-2016

3,891,277 - Age 2 ocean fish & younger - 61.44%

Terminal - Age Comps - 2004-2008

615,026 - Age 2 ocean & younger - 69.23%

888,377 - Total harvest - Terminal

Kasilof River Escapement - 1999-2016

3,891,277 - Age 2 ocean fish & younger

6,333,068 - total Escapement in Kasilof River

61.44%

Kasilof Terminal Fishery Age Comps 2004-2008

615,026 - Age 2 ocean younger in harvest

888,377 - Total harvest

69.23%



Submitted By
Gary L. Hollier
Submitted On
2/8/2017 12:25:45 PM
Affiliation
ESSN

Dear Alaska Board of Fish,

I have fished the Kasilof Terminal Harvest Area every year that it has been open since the first year in 2004.

I STRONGLY support proposal 114, that requires all material used in the Terminal Harvest Area to be removed at the end of each closure.

I have been one of the fishermen that has staked in buoyed locations in this fishery. I held those locations for the whole fishery. This practice gives a huge advantage over fishermen that want to participate at the last minute.

I don't think that buoyed in locations is the real intent of a terminal fishery. When the time for the fishery goes off, every one that wants to fish in the area should have the same advantage.

Anchors, set lines, nets, buoys etc. would be easy to pull at the end of the fishing period.

A driven stake is another obstacle. One way to enforce this provision is to not allow nets to be set on bouys or set lines that are in the water before the fishery commences. This would be easy for ADF&G to enforce, as if a fishermen ties up to a bouy or exsisting line in the water, then sets a net on the opener, would be a violation, and very easy to spot.

Proposal would certainly level the playing field in the Kasilof Terminal Area.

Thank you,

Gary L. Hollier



Submitted By
Gary L. Hollier
Submitted On
2/9/2017 3:43:29 PM
Affiliation
ESSN

Dear Chairman Jensen and Members of the Board of Fish,

I submitted proposal 165 which deal with the Kenai River late-Run King Salmon Management Plan (KRLRKSMMP).

In this proposal I was asking for the August 1-15 part of the plan (5 AAC21.359 f) which deals with , the projected escapement of king salmon into the Kenai River, which currently stands at 22,500 be lowered to 15,000-16,500 escapement of late-run king salmon into the Kenai River.

Projected escapement in July minus harvest in river = escapement.

Since turning in proposal 165, ADF&G with virtually no public input or process, came out this winter with a new BIG King Salmon goal. This SEG goal was to be 13,500-27,000 BIG king salmon to the Kenai River.

On paper it looks like the goal was dropped 10%, but BIG king salmon make up approximately 30% of the run. So to me the goal was raised 20%. This additional increase in escapement will have to be provided to the in-river harvester from basically the ESSN fishery.

In light of this new goal, brought up at the eleventh hour by ADF&G, and if the BOF accepts this new goal, I would like to amend proposal 165.

The regulation would read something like this:

5 AAC21.359 (f) From August 1 through August 15, if the projected escapment of king salmon into the Kenai Rlveer is at least 13,500-15,000 notwithstanding.....

An escapement above 13,500 is in the proposed SEG range for BIG king salmon into the Keani Rlver.

Thank you,

Gary L. Hollier



Submitted By
Gary Snyder
Submitted On
2/7/2017 7:27:14 PM
Affiliation

Phone
(907)337-2089

Email
alaskagary@hotmail.com

Address
2421 Maple Ave
Anchorage, Alaska 99508

Board of Fisheries- In your decisions regarding Upper Cook Inlet please give more priority for fish allocation to the personal use fisheries. These fisheries are enormously popular and are available to a wide variety of residents. The shores of Kenai Peninsula are very crowded with local Alaskans trying to get a share of the salmon. Unfortunately, as climate change and other factors, alter the timing of the salmon runs our State policies follow a rigid calendar. If salmon runs are later in the year than they have historically been then please adjust the timing of the personal use dipnet fisheries to coincide with the salmon. If salmon runs peak on the Kenai later than they used to then please allow dipnetting into early August. It makes sense to adjust openings for personal use fisheries, like commercial openings, based on when the salmon are running. Thank you.



Submitted By
Gary Steele
Submitted On
2/7/2017 11:18:07 AM
Affiliation

Greetings,

I'm a Personal Use dipnetter since it began. We count on this harvest to feed our extended family for the year. With the changes in the salmon run, and the amount of openers for commercial fishing, the time, cost and success of reaching our limit has increased/decreased substantially.

Every day the fleet goes out the return to the river is weak. We used to be able to go down and get our limit in two tides. We haven't been to do that in three years. This increases the time and cost to us, the amount of people on the beach, and the chances of success.

I ask the board to manage the fishery equally for the personal use and commercial.

This would seem to mean maintaining the 36 hour non-commercial windows, and extending the season to match the run.

Sincerely,

Gary Steele



Submitted By
George M Contantino
Submitted On
2/8/2017 6:24:45 AM
Affiliation
Self

Phone
9045570862
Email
gconstantinosr@hotmail.com
Address
PO Box 230483
Anchorage, Alaska 99523

We support proposals to protect the Kenai River sockeye and silver runs while still allowing dipnet fishing to remain open into August. As you know the sockeye salmon runs have been arriving later in the season, which results in a substantial part of the Kenai River run entering the river after the Alaska Department of Fish and Game has closed the dipnet fishery. At the same time, commercial fishermen have been allowed to take advantage of continued strong returns well into August.

Unfortunately, dipnet fishing in the Kenai River by has been blocked from fishing after July 31st, and this denies dipnetters a fair chance at catching their limit of fish.

It is common knowledge that the sockeye runs into the Kenai River are coming in later. We recognize that commercial fishing industry is important, but it is wrong to block individual Alaskans from dipnet fishing while commercial fishing is extended to August when the runs are strong.

In summary, if the Alaska Department of Fish and Game allows August fishing by commercial fishermen, and it does not endanger the sockeye or silver runs, then the department should allow the same opportunity to the more than 600,000 Alaskans that do not own commercial fishing vessels or permits."



Submitted By
Greg Giauque
Submitted On
2/4/2017 7:12:09 AM
Affiliation

Phone
9077451712

Email
Akgiauque@yahoo.com

Address
3900 South Tustin dr
Palmer, Alaska 99645

As a life long Alaskan, I urge you to move forward with the Northern Cook Inlet safety zone & the Kenai river harvest zone.



Submitted By
Hans Nordstrom
Submitted On
2/2/2017 2:35:16 PM
Affiliation
MatSu AC

My name is Hans Nordstrom. I am a resident of Wasilla and serve on the MatSu AC. I am extremely concerned about the direction of the fisheries in the state. The decrease in returning salmon and lower numbers in halibut have me and many people that talk to concerned about the sustainability of this resource in the future. I live in Alaska largely for the outdoor opportunities in hunting and fishing that it provides my family. It seems that the current approach is to put an extraordinary burden for conservation on resident sportsman, while not addressing the real issue. The commercial overharvesting and bycatch of these species vastly exceeds any pressure that a group of sportsman apply. If you are honest with yourselves, you know the only way to improve fish population is to focus on the group that harvests over 90% of the resource. Most people I know are willing to do their part, but just because someone uses the resource for commercial interest it does not give them priority over other residents who do not.

Thank you,

Hans Nordstrom



Submitted By
James Grotha
Submitted On
2/7/2017 11:42:13 AM
Affiliation

The **Kenai** River is, without a doubt, the most popular dipnet fishery in Alaska. It is a fact, that dipnetters will not catch sockeye (reds) when the commercial fisheries are out. Allowing **no** setnets, gillnets, driftnets - Thursday thru Sunday of the dipnetting season in the Kenai or Kasilof Rivers should be policy, except for existing Federal subsistence regulations (ANILCA). If dipnetters have restrictions of Alaska residents only, why not the commercial fisheries?



Submitted By
Jayden
Submitted On
2/9/2017 9:21:51 PM
Affiliation

Hi, My name is Jayden. I'm 7. I want to grow up and catch salmon with the set net like my dad, mom and grandpa. I love to be my daddy's fisher girl and love to be on the crew. please help my family to keep fishing for a long time.



Jim Colver
PO Box 427
Palmer, AK 99645

February 9, 2017

Alaska Board of Fisheries
ADF&G Boards Support

Dear Board Members:

Re: UCI Central District Management Plan Comments

Discussion:

After decades of failing runs and numerous salmon runs listed as stocks of concern in the Northern District, the Board in 2014 responded by implementing a conservation corridor to allow salmon to pass thru to their spawning grounds.

The plan is working. In 2014 and 2015 coho escapement numbers were up and Alaskans were once again able to catch silvers in the Mat-Su.

The conservation corridor does not reduce commercial harvest; it just more surgically implements harvest of Kenai sockeyes and minimizes intercept of mixed stocks, including sockeye, coho, chum, and pink salmon bound for northern district drainages.

I am opposed to Proposals: 85, 86, 87, 88, 89, 90, 91, 94, 96, 97 and to any proposal which would repeal or alter the conservation corridor.

The reason I am opposed to these proposals, is because they fail to put conservation of the resource first. If northern district stocks rebound, which they will if the conservation corridor is kept in place, then the management plan can be reevaluated at a future date.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Colver', with a large loop at the end.

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission



Jim Colver
PO Box 427
Palmer, AK 99645

Alaska Board of Fisheries
ADF&G Boards Support

February 9, 2017

Dear Board Members:

Re: UCI Kasilof Sockeye Salmon Management Plan Comments

Proposal 99, Oppose

To repeal all set gillnet regulations for Kasilof sockeyes, would be like driving a car blind. Repealing all regulations will cause unintended consequences for other user groups. The proposal is allocative and not scientifically or biologically supported with any research or data.

Proposal 100, Oppose

Changing the regulations from a "may to a shall" to trigger the opening of the set gillnet fishery will remove the management discretion necessary for managing the Kasilof. Managers must look at the bigger picture, such as conservation concerns the department has implemented the last 2 of 3 years for low chinook salmon returns. There is also a delicate balance between user groups. About 20 years ago, the eastside PU gill setnet fishery was reduced from over a hundred mile of beaches to about a mile either side of the Kasilof River, with an opening from June 15-25 to avoid conflict with other user groups, especially the set gillnetters. Opening up the set gillnet commercial fishery earlier will reduce opportunity for the short PU fishery and upset the balance between user groups.

Due to Chinook concerns, the June 15-25 set gillnet PU fishery was reduced to about 3 days in 2014 and in 2015 the fishing period was reduced by 5 hours a day for the season. This proposal will tie the hands of managers to implement conservation measures for chinooks. For these reasons I urge you to table this proposal.

Sincerely,

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission



Jim Colver
PO Box 427
Palmer, AK 99645

February 9, 2017

Alaska Board of Fisheries
ADF&G Boards Support

Dear Board Members:

Re: Escapement Goals, UCI Northern District Management Plan

Discussion:

After decades of failing runs and numerous salmon runs listed as stocks of concern in the Northern District, the Board in 2014 responded by implementing a conservation corridor to allow salmon to pass thru to their spawning grounds.

The plan is working. In 2014 and 2015 coho escapement numbers were up and Alaskans were once again able to catch silvers in the Mat-Su.

I urge the board to keep in place escapement goals for northern district drainages and establish escapement goals where none exist.

Manage on science, not politics.

Sincerely,

A handwritten signature in black ink, appearing to read "J Colver", with a large loop at the end.

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission

Jim Colver
PO Box 427
Palmer, AK 99645



PC28
4 of 4

Alaska Board of Fisheries
ADF&G Boards Support

February 9, 2017

Dear Board Members:

Re: UCI Kenai / Kasilof Personal Use

Discussion:

The PU fishery on the Kenai Peninsula is a fishery that thousands of Alaskans participate in, from Fairbanks to the Mat-Su to feed their families. I have personally participated in Cook Inlet subsistence/personal use fishing for 26 years and do it every year. The personal use fishery is working, as evidenced by the sharp reduction in proposals this cycle that would attempt to curb opportunity for Alaskans to participate, or reduce bag limits in the PU fishery.

They're not broken, so don't mess with any of the established PU fisheries. Alaskans rely on the stability and the schedule that the PU fishery operates on in Cook Inlet. The PU fishery affords opportunities for young Alaskans as well as our seniors to participate.

Proposal 195, oppose,

I oppose proposal 195 because it would limit the emergency order authority of fisheries managers to make in-season decisions in the best interest of the resource.

Accommodations can be made to the city's beach cleaning without destroying management tools for the fishery, yet assuring Alaskans access to the resource.

Proposals 196, 197, and 198 oppose

These proposals are punitive without any scientific or biological evidence to support them. They simply will result in less a less successful opportunity for Alaskans to participate in the personal use fishery.

Proposal 199, oppose

The drift boats that transit the Kasilof don't have 10hp motors, why should others be restricted. I am not aware of a problem on the Kasilof with boat dipnet PU harvest.

Proposal 203 support

In times of abundance for a large run of Kenai sockeye, it is a good management tool to grant the Commissioner authority to extend the season and bag limit for personal use

Sincerely,

A handwritten signature in black ink, appearing to read "Jal", with a long horizontal flourish extending to the right.

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission



Submitted By
Joan Clover
Submitted On
2/7/2017 10:44:29 AM
Affiliation

Phone
9072239968
Email
joniclover@gmail.com
Address
3961 McMahon Ave
Anchorage, Alaska 99516

Dear Board of Fish Members: I write in support of extending dip netting for the public on the Kenai River to comport with the extended commercial season. With good runs coming later and later, specifically past the closing date for Alaskan families, we have not had the best opportunities to fill our freezers with our beautiful Alaskan salmon. Our family really missed the excitement and wonderful team work of earlier years when the fish have been "in" ! What an amazing, bonding tradition our dip netting trips have been, and how wonderful it has been to enjoy the results of our hard work throughout the year. We have historically been able to brag to our Alaskan visitors that we "caught" this fish! This past year was so disappointing. Although we traveled south to dip-net several week-ends, we caught very few fish. We wondered if the commercial nets were getting all of them and thought "Gee, they should at least let us have them on Saturdays!" We sadly, talked about whether it was "worth it." We are several families that spend the week-end fishing and camping together, then go home to someone's driveway to clean and freeze our fish as a laughing, joking, slimy assembly line, dividing our fish equally. Not last year. I hope that extending our season will let this tradition resume. Thank you. Sincerely, Joan Clover



Submitted By
Joan Diamond
Submitted On
2/7/2017 9:14:15 PM
Affiliation

Phone
907-360-8871
Email
Buddy4@al.net
Address
5700 Rabbit Creek Rd
Anchorage, Alaska 99516

Our family has been dipnetting for many years and it is obvious that

the salmon are coming in later and later. For the last 3 years it has been a bust and a lot of time and money has been expended without much to show for it. We are very tired of missing the run and the fishery closes as the fish go to commercial nets. Please extend the fishing limit for dipnetters.

for Alaskan families.



Submitted By
John Kaiser
Submitted On
2/9/2017 3:29:51 PM
Affiliation
None

Limit the length of dip net handles to no more than 13ft, not including length of hoop. Total length of a dip net, including 5ft hoop would then not be able to exceed 18ft in length. Excessive handle lengths are creating a serious safety hazard for younger dip netters down on the beach. Bad experience could cause young dip netters to never want to dip net again as well as injuries that could be serious to eyes or face.



Submitted By
John S. Sonin
Submitted On
2/7/2017 10:57:37 AM
Affiliation
Civilized Humanity

Phone
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329 Fifth Street
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Juneau, Alaska 99801

In order we maintain a civilized culture in which we and our prodigy can continue to seek a fulfilling existence, we must defer resource benefits attributing to business interests at the cost of nonprofit seeking individuals. When we control a seasonal catch for private fishermen and allow unlimited access for those abstract creations seeking profit, we are discounting the civilization that has imagined that profiting abstraction in total disregard for those that have imagined those profit-seeking abstractions. The Kenai River Sockeye Run, if made available for any type of fishing, corporate or private, must assure the creator before maintaining the creation at, at least, an equitable sanction. When business (commercial abstractions) are able to optimize a shifting climate to achieve their quotas, private fishers must first be given an equitable preference!



2017 Upper Cook Inlet Written Comments

Joseph Person

Board of Fisheries Members,

My name is Joseph Person and I am a third generation East Side Setnetter on the Ninilchik beach. I have actively participated in this fishery every year from my very early childhood, and it is a central component of my personal identity and way of life. The last few years have seen a constant struggle to maintain viability of our fishery season to season and it is often difficult to look far into the future, but I would very much like to be fishing and raising another generation of setnetters for the next 30 years. Facing a constant battle from public perception, other user groups, and sometimes the department itself this seems an impossible dream to many of my fellow fishermen today. I have two proposals under my name up for your consideration, and unsurprisingly an opinion on most of them. Following are some brief comments that I hope you will read and consider.

Thankyou

Joseph Person

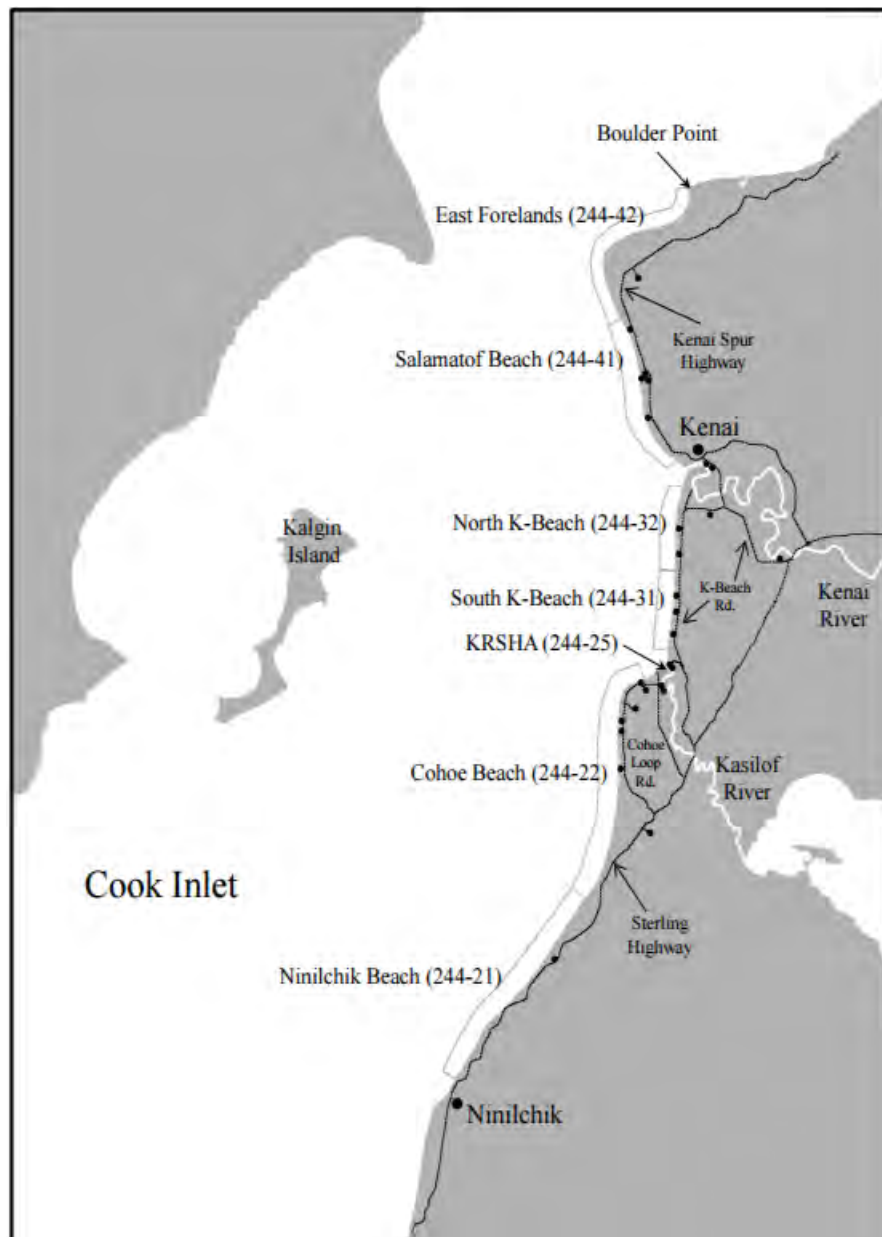
Proposal 100: Change “may” to “shall” for the 50,000 fish Kasilof trigger after June 20th. Historically this was treated as a hard trigger and for all intents and purposes if the Kasilof hit 50,000 we opened immediately, once as early as 12:01 AM. Most of the time this trigger is met it represents very productive fishing for the furthest south beaches and can be some of the best part of their season. This June fishing time in the Kasilof section also has basically the cleanest sockeye to chinook ratios in the entire fishery. For all intents and purposes this IS the time of year when reds *can* be in the water and kings are not. The Kasilof has overescaped year after year, and these early fishing days are important for getting ahead of the counter. Once those fish are by they can never be gotten back, resulting in overescapement and extensive use of the Kasilof River Special Harvest Area. In recent years due to political pressures and conflicts within the department, several extremely valuable days of fishing opportunity were squandered. I would like the Board to approve this proposal in order to remove the political wrangling currently involved in the issue in-season.

Proposal 101: Allow time fished in the 600ft fishery to not count towards hourly fishing limits. This 600ft fishery was used in 2015 and was generally considered to be a huge success. Under authority of the commissioner it was essentially used in the manner requested outside of hourly limitations. This fishery is vastly preferable to the Kasilof River Special Harvest Area in many ways; better fish quality, more equitable opportunity, and a more orderly fishery.

Proposal 110, 111, 112: Allow dual permit holders to fish two nets in the Kasilof River Special Harvest Areas. I think it is fairly clear that the original intention was for one net per permit, and the fact that this is even an issue is a bit ridiculous.

Proposal 124, 125: Pink Salmon Management Plan. While this plan is great in theory, in practice the requirements are so restrictive as to make participation and harvest inconsequential. Reducing these restrictions seems appropriate. The mesh size restriction in particular precludes many fishermen from using their normal gear, and the *possibility* of a couple days of pink fishing every other year is not even close to justification for hanging another set of gear.

Proposal 135: Go to a three section management scheme. This is my own proposal. I feel this is an important eventual step for the long time viability of the East Side Setnet Fishery. Here is a map of the statistical areas for reference, with the natural break points advocated for in my proposal clearly apparent. The next table demonstrates the permits fished in each stat area in 2016. Both of these were pulled from ADF&G reports.



**2016**

Gear	District	Subdistrict	Stat Area	Permits ^a
Setnet	Central	Upper	24421	100
			24422	72
			24431	65
			24432	59
			24441	65
			24442	31
			All	392

Proposal 136: Implementation of a 600ft fishery on N K-Beach. I strongly support this in concept, and feel that more fishing opportunity for N K-Beach is warranted, however I find the 4 ¾ mesh size restriction somewhat concerning. It seems highly unlikely to produce savings in chinook catch, and I strongly oppose the notion that smaller gear should be mandatory when given openings targeting Kasilof fish.

Proposals 137, 138, 139: Remove the one percent rule. On a fundamental level a closure based on harvests of sockeye makes very little sense. Management is already structured around escapements of sockeye and chinook, and if those are insufficient the one percent rule does not come in to play. If concerns are about another species (for example coho) then have a trigger point based on coho catches, or coho catches relative to sockeye catches. In reality there aren't really any conservation concerns about other species during that part of the season, and hasn't been for some time. As a fisherman on the Ninilchik beach in the far south of the area the vast majority of my neighbors stop fishing around the beginning of August. There can still be sufficient fish for the remaining sites to scratch away and try to finish out their season, but the fractional amount of effort in the Kasilof section in particular makes catching 1% of the seasons harvest quite difficult even when the fishing is actually good. The last two years featured extremely late sockeye run timings that made for fairly productive fishing in August that was cut short by this needless regulation.

Proposal 140: Allow 29 mesh deep nets to be 45 fathoms long. I feel this proposal is completely unfeasible. The fishery is fully net locked in many regions and there is no room for a 30% increase in gear. Even if the board is to decide that shallow gear is advisable for chinook salmon conservation I strongly hold the position that it should correspond to more allowed fishing time, not longer length gear.

Proposal 143: Increase the smelt quota. While I do not participate in this fishery I participate in many other small fisheries outside of the salmon season and highly value their existence. As far as I can tell,



this raise in quota is entirely justified and I would like to see it happen. Low barrier to entry fisheries outside the salmon season are relatively few and far between and fulfill an important niche.

Proposal 163. Late Run King Salmon Management Plan. Particularly in light of the recent change to a large king goal, the current King Salmon Management Plan adopted in 2014 needs significant review. It currently place an entirely disproportionate burden of conservation on the setnet fishery that is not in the slightest commensurate with its impact on the chinook stocks. There are a lot of ways this could be done, this is a good starting point; but in truth the entire plan is overcomplicated and unnecessarily restrictive to managers.

Proposal 175. Clarify King Salmon Management Plan step downs in regards to fishermen who choose to fish four "short" nets. This is my own proposal. I believe I have laid the situation out clearly both in this proposal and when I submitted it as an ACR after the 2014 season (where it failed 4-3 I believe). I really hope that the board will clean up this unintended effect that cost me quite a few fish when for no good reason whatsoever I was forced to give up 25% of my gear on the best day of 2014. Fortunately it has not come into effect since then and if the Board chooses to clean up the chinook plan, this issue will probably just disappear.

Proposal 176 and 177. When in King Salmon Management Plan allow the 36 hours to be calculated separately for Kenai and Kasilof sections. While I would much prefer to not be stuck with this odorous "step down" of no regular openers and 36 hours of EO time for the most important 3 weeks of my season based solely on the preseason forecast, if it is to be the case allowing the beaches to be fished separately is critically important. With the current system fishermen on the southern beaches are often forced to watch large numbers of fish swim by their sites while the department waits hoping to use their limited hours "most effectively" at the mouth of the river. Sadly this is often not successful and they fail to put fishermen anywhere on the fish. So called "abundance based management" needs to mean *everyone* has an opportunity when fish are present on their beaches, not just a select few.

Thankyou for your time and I hope you will consider my comments. I will be attending the entirety of the meeting and if any more information is desired on either of my proposals I will be happy to submit it as an RC.

Joseph Person



February 7, 2017

John Jensen, Chairman, Alaska Board of Fisheries

Dear Chairman Jensen:

As an Alaskan, a long time sports fisherman, a commercial fisher for several year in the eighties, and a former member of the Alaska Board of Fisheries, I am writing to suggest that the BOF be cautious when considering the many proposals requesting a roll back or change of Upper Cook Inlet regulations put in place during recent years. Continued evolution of the fisheries and their uses based on the best available science should always be considered, but my experience on the Board informs me to advocate caution in making changes at this time.

The purpose of this Public Comment is to respectfully ask the Board, as it faces the UCI meeting, to carefully consider the need for changes. Certainly there will be a need to make adjustments when science shows the need for a correction. But changes to carefully crafted regulations adopted and adjusted over a long period of time should be based on good reasons and not made just for the sake of change or because of reasons unrelated to the fishery's needs.

A lot of hard work, by many people, go into the establishment of management plans. Once in place stakeholders have a right to depend on them in making business and recreational plans for the future. Every three years many of the same proposals are submitted with little change in the fisheries taking place to justify modifications. Yet sometimes changes occur which put stakeholders in the awkward position of having to make last minute adjustments to their plans. Sometimes it has seemed



that the only changes that have occurred were changes in the roster of the BOF. I recall, when first appointed, how hard I was lobbied by user groups, many wanting to revisit decisions of the past with no new information, and just using a rehash of past arguments.

The BOF has devoted more time and effort determining the right path forward for the salmon fisheries of UCI than the fisheries of any other region of the state, and for very good reasons. In many ways when the BOF meets to deliberate UCI they are writing the book on best management for complex mixed stock challenges where commercial and noncommercial fishing interests must be balanced.

Dramatically changing demographics, economics, and culture in the UCI region have increases demand for equal access to the common property resources. The BOF has recognized and dealt with those issues in ways that have never left everyone happy. Predictably and understandably, there are unhappy user groups that have had to sacrifice in what was one time a fishery that they did not need to share nearly as much as is required today. And as times continue to change, as they certainly will, the BOF will need to make adjustments in regulations to address these changes.

In the last few years complex management plans have been adopted in an effort to reflect the need to conserve and rebuild mixed stocks and to move the harvest of some stocks closer to their point of origin. These plans seem to be achieving some positive results. But it is a little early to come to any final conclusions. The life span of fish often requires more than three years between BOF meetings to determine whether the plans are working as hoped. Patience rather than change may be needed.



In the case of Chinook, their populations are showing signs of rebounding. But we are not out of the woods yet. There are still waters where returns are not sustainable without special actions by the BOF and the ADF&G. These fisheries should always be monitored closely for trends and the need for more conservative action. And the Board should not hesitate to act when needed.

At this time I believe that, for the most part, UCI management plans and accompanying regulations need more time to work. Another cycle will teach us a lot about just how well they are doing. The trend certainly looks good, but more time is needed.

I wish the board my best in meeting the significant challenges that will be presented at the upcoming UCI meeting.

Sincerely,

Karl Johnstone



Alaska Dept. of Fish and Game Board of Fisheries

OCT 28, 2016

P.O. Box 115526

Juneau, AK 99811-5526



Dear Board Members,

I have been a resident of Alaska since 1974. I have been actively involved in the sport fishery since that time, especially on the Kenai River, and have actively participated in the dip net fishery from the Warren Ames Bridge to the city dock for many years.

There was a time when there was no maximum hp. for motors on boats on most of the river. Then there was a 35 hp. maximum which was recently increased to 50 hp. These limitations were due to bank erosion and safety as the participation in the fishery drastically increased. I totally agreed with those changes.

Now I would like to talk about the dip net fishery on the Kenai River as it applies from the Warren Ames bridge to the city dock. Over the years, participation in this fishery has grown exponentially and has become extremely dangerous due to the number of boats including more powerful and faster boats participating. Also, over the years I have seen more boats swamped and/or capsized each year from wakes of these more powerful and faster boats. This past summer there were at least 5 boats swamped/capsized. FORTUNATELY, all occupants SURVIVED. In addition, with the no wake zone being established to include approximately 25-30% of a large part of the river in question it puts all of the boats in a smaller area and makes it that much more congested. I am convinced that it is only a matter of time before there will be a tragic accident resulting in one or more deaths. All you have to do is observe this increasingly dangerous situation.



I strongly believe there should be a 50 maximum hp. from the Warren Ames bridge to the city dock as on the rest of the lower river. It is already in place for the first portion of the area just below the Warren Ames bridge. I urge you to make this change before there is a tragic accident.

Obviously, the commercial boats moored in that section of the river would be exempt as long as they were not dip netting.

Will there be opposition to this change? Of course there will be just as there was opposition years ago when the initial restrictions were implemented.

Again, I urge this change be made before there is a tragic accident (loss of life). Surely, public safety should be at the forefront of this issue.

Thank you for your consideration.


Ken Hinkle

4044 Main St.

Homer, AK 99603

907-235-1822

P.S. I totally agree that no king salmon should be retained in the dip net fishery until the king salmon return recovers.



Submitted By
Dwight Kramer
Submitted On
2/6/2017 2:15:42 PM
Affiliation
Kenai Area Fisherman's Coalition

Phone
907-283-1054
Email
dwimar@gci.net
Address
PO Box 375
Kenai, Alaska 99611

~~Board of Fisheries

Please accept our **Kenai Area Fisherman's Coalition (KAFC)** comments on Upper Cook Inlet (UCI) proposals in preparation for your UCI finfish meeting scheduled for February 23 through March 8, 2017.

Proposal 145 : Allow only barbless hooks in Upper Cook Inlet flowing waters closed to salmon fishing.

We support this proposal. Due to high hook and release rates Rainbow Trout exhibit high rates of mouth/lip damage. Barbless hooks facilitate faster release rates, reduce physical damage and reduce stress on these populations of fish.

Proposal 147: Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery.

We support the concept of starting the Early Run fishery without bait, stepping up to allow harvest and finally stepping up to a bait fishery at the discretion of the Department.

Proposal 149: Revise Kenai River and Kasilof River Early-run King Salmon Management Plan.

We oppose this proposal as written. We agree in concept with the stated goals and conservation sentiment of this proposal. However, as written it is very difficult to decipher and would be difficult and confusing to put into regulatory language. We also feel that some aspects are too liberal on ER harvest and would not provide adequate protection of some individual segments of the ER population.

Proposal 150: Start the Kenai River king salmon sport fishery as single-hook, no bait, non-retention.

We support starting the Early Run fishery without bait, stepping up to allow harvest and finally stepping up to a bait fishery at the discretion of the Department.

Proposal 151: Repeal barbless hook provisions in Lower Kenai River.

We oppose this proposal. The intention of the "hook and release only" restriction is to release all king salmon hooked. Barbless hooks allow easier release and result in less morphological damage to fish being released. This is especially important during times of low escapement levels.

Proposal 152: Expand the dates to prohibit back trolling and tie to prohibition of bait.

We support this proposal. We believe this is a reasonable attempt to better utilize these waters when bait is not allowed and more preferable methods, other than drifting, are more productive.

Proposal 153: Prohibit fishing for king salmon from markers 300 yards below Slikok Creek upstream to Skilak Lake.

We support this proposal. Both runs of fish have experienced declines in recent years. Kenai River regulations allow fishing on essentially 50 miles of river compared to nine miles on the Kasilof and two miles on the Lower Peninsula streams. All Peninsula streams other than the Kenai River have what is essentially a pass-through fishery where they are protected once making their way upstream a few miles. Of particular concern is that Early Run fish which spawn in the mainstem have suffered the greatest harm being subjected to up to 60 days of fishing pressure the last segment of which is on spawning beds and staging areas.

Proposal 155: Expand the waters of the Kenai River closed to fishing for king salmon.

We support this proposal. However, we would more strongly support the more restrictive Proposal 153.

Proposal 156: Replace slot limit for Kenai River king salmon with maximum size limit to prohibit retention of king salmon greater than 42 inches in length.

We support this proposal. This proposal is designed to reduce selective harvest on the larger age classes of fish and eventually restore



historic age class composition. Additionally, it provides additional opportunity for anglers to catch and release “trophy size” king salmon as they would remain in the fishery as the mortality would be limited to a lower level of “hook and release mortality”. Anglers wishing to harvest king salmon would still have the opportunity to harvest the more abundant younger age classes of fish.

Proposal 157: Modify the annual limit of king salmon from the Kenai River to two fish, only one taken prior to July 1.

We support this proposal. This measure would lower mortality of “Early-Run” king salmon and provide additional fish for harvest to other anglers.

Proposal 159: Extend the time that the slot limit for Kenai River king salmon is in effect.

We support this proposal. However, we would more strongly support the more restrictive Proposal 156.

Proposal 166: Modify season dates and area for Kenai River late-run king salmon management.

We support this proposal. Telemetry data indicates that in some years 40-50% of the main stem spawning component of early-run fish remain below the Soldotna Bridge on July 1 when the arbitrary shift to late run assessment begins. This regulatory change would provide additional protection to this component of the early run.

Proposal 178: Increase the number of days only non-motorized vessels may fish on the lower Kenai River.

We support this proposal. This proposal addresses not only quality of the fishing experience in an increasingly crowded fishery but provides a small additional measure of habitat protection by reducing turbidity and erosion.

Proposal 179: Add Thursdays as a day only non-motorized vessels may fish on the Kenai River downstream of the Sterling Hwy. Bridge. (Please note that when the department re-wrote this proposal into the proposal book they mistakenly stated “downstream of Cunningham Park” and it should have stated, “downstream of the Sterling Hwy. Bridge”)

We support this proposal. This proposal addresses not only quality of the fishing experience in an increasingly crowded fishery but provides a small additional measure of habitat protection by reducing turbidity and erosion.

Proposal 180: Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15.

We support this proposal.

Proposal 181: Only non-motorized vessels may be used when fishing on the Kenai River.

We support the concept of increasing non-motorized fishing days (see proposals 179 and 180). However, we do not support this proposal as written.

Proposal 182: Prohibit all guiding from 6 p.m. to 6 a.m.

We support this proposal. With increasing pressure on the sockeye salmon fishery by guided anglers, non-guided anglers are having an increasingly difficult time accessing traditional fishing locations. This proposal would reduce congestions and provide an increased quality of fishing experience for guided as well as non-guided anglers. Additionally, this would provide habitat protection from increasing levels of erosion and turbidity.

Proposal 183: Allow guided anglers to fish on Mondays in August.

We oppose this proposal. Many years ago the Board recognized growing pressure from the guide industry and provided non-guided anglers Monday's as respite from this competition. Pressure on Kenai River salmon resources continues to increase. Adoption of this proposal would be a step to additional commercialization of this increasingly targeted fishery resource.

Proposal 184: Relax guiding restrictions when king salmon fishing is closed by emergency order.

We oppose this proposal. See discussion under proposals 182, 183 and 185. Additionally, adoption of this proposal would increase commercial activity on Sundays as well as Mondays.

Proposal 185: Modify language referencing fishing from guide boats on the Kenai River to include all guided fishing.

We support this proposal. Many years ago the Board recognized growing commercialization of Kenai River sport fisheries and the impact on private anglers. With rapidly increasing pressure on the sockeye salmon fishery by guided anglers, non-guided anglers are having an increasingly difficult time accessing traditional fishing locations. This proposal would reduce congestions and provide an increased quality of fishing experience for guided as well as non-guided anglers. Additionally, this would provide habitat protection from increasing levels of erosion and turbidity.

Proposal 186: Only barbless hooks allowed in Kenai River upstream of the Lower Killey River.

We support this proposal. . Due to high hook and release rates Rainbow Trout exhibit high rates of mouth/lip damage. Barbless hooks facilitate faster release rates, reduce physical damage and reduce stress on these populations of fish.



Proposal 188: Allow only one single-hook or one single-hook lure.

We support this proposal. On the Kenai River there are multiple and confusing regulations concerning when and/or where single or multiple hooks may be used. Pressure is increasing on all species and hook and release fishing has become more and more prevalent. Multiple hooks cause unnecessary damage to fish intended to be released. Single hooks are efficient at catching all species of Kenai River fish.

Proposal 189: Allow fishing from shore after harvesting a bag limit of coho salmon.

We oppose this proposal. Anglers fishing from shore readily catch coho salmon and the current restriction is designed to provide protection to this species in a fishery which has become increasingly popular. The proposed regulation change would increase hook and release mortality (coho salmon experience high hook and release mortality, especially when early in the fresh water migration) and increase regulatory complexity. Coho salmon are just starting to build in numbers when sockeye salmon are rapidly decreasing in numbers. This proposed regulation would provide little additional angler opportunity.

Proposal 190: Expand the waters open to fishing after harvesting a bag limit of coho salmon in the lower Kenai River.

We oppose this proposal. See proposal 189.

Proposal 191: Increase Kenai River coho salmon bag limit from two fish to three.

We oppose this proposal. Bag limits on coho salmon were reduced in response to increased harvests and declining populations in the 1990's. Pressure varies in response to run strength. Increasing the bag limit to three fish is not justified. In recent years anglers have increased efficiency utilizing more efficient fishing techniques. The Department has no programs in place to monitor in-season abundance, escapement levels or smolt outmigration. Therefore, increasing harvest potential would be a poor management practice without any programs in place to monitor this population.

Proposal 192: Shorten the Kenai River coho season by closing October 31.

We oppose this proposal. Late season fishing pressure has not significantly increased. The current late season fishery does provide opportunity to a small number of anglers. If there are concerns regarding escapement levels the first step should be to reduce the daily bag limit during the months of September and October from three fish to two.

Proposal 193: Create an archery fishery for sockeye salmon in a section of the Russian River.

We oppose this proposal.

Proposal 194: Create a size limit for lake trout on Hidden Lake.

We support this proposal.

Proposal 195: Remove the commissioner's emergency order authority to extend the Kenai River personal use fishery hours.

We support this proposal.

Proposal 196: Prohibit dipnetting from a vessel that is not anchored in the Kenai and Kaslof river personal use fisheries.

We oppose this proposal. This proposal is unduly restrictive.

Proposal 197: Prohibit dipnetting from a vessel that is not anchored in the Kenai and Kaslof river personal use fisheries.

We oppose this proposal. This proposal is unduly restrictive.

Proposal 198: Prohibit webbing in personal use dip nets that exceeds 2.5 inch stretched measure.

We oppose this proposal. This proposal is unduly restrictive.

Proposal 200: Amend the number of king salmon that may be retained in the Upper Cook Inlet personal use fishery to 1- king salmon under 20 inches.

We oppose this proposal. This proposal is unduly restrictive. King salmon harvest in the Personal Use Fishery is not significant and is restricted during periods of low abundance. This fishery does provide a small opportunity to harvest king salmon for Alaska residents participating in this fishery.

Proposal 201: Amend the area open to dipnetting from shore in the Kenai River personal use dip net fishery.

We support this proposal.

Proposal 202: Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August.



We oppose this proposal.

Proposal 203: Extend the season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon.

We oppose this proposal.

Proposal 204: Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park.

We oppose this proposal.

Proposal 205: Allow shore based personal use dipnetting in the Kenai River upstream to Skilak Lake.

We oppose this proposal.

Proposal 208: Allow 10 Dolly Varden/Arctic char per household in Cook Inlet Personal Use Fisheries.

We oppose this proposal.



Submitted By
Ed Schmitt
Submitted On
2/1/2017 8:45:02 AM
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~~The Kenai Area Fisherman's Coalition (KAFC) would like to submit the following comments for the 2017 UCI BOF meeting. KAFC is a private angler sport fishing organization from Kenai dedicated to sustainable management of our resources and private angler rights. These comments are high priority items for us going into this meeting. A full list of comments will follow in the next few days.

KAFC Supports the Following Proposals;

Proposal 153.... This is a KAFC proposal which seeks to close the waters on the Kenai River to King salmon fishing above Slikok Creek;

We believe this action would provide for spawning certainty and long-term future sustainability of both our ER and LR Kenai River King salmon while still allowing for a vibrant sport fishery in the lower 18 miles of the Kenai River. This area is where the two major tributaries for ER fish (The Killey and the Funny R.) are and over 60 of the mainstem spawners spawn, including almost all of the ER maintem spawners. This provision would allow spawning in their own age class diversity without the effects of selective harvest of the oldest and biggest age class fish. This protection will help us recover and sustain our older age class fish and provide more opportunity for everyone to catch more large fish in the future returns. For more pertinent information on this please see proposal.

Proposals 154 (Heather Pearson) & 155 (USF&W).... Both of these proposals seek to close the federal (USF&W) waters to King salmon fishing from Skilak Lk. downstream to the Killey River;

The purpose of these proposals is to offer more protection to early arriving mainstem King salmon that are vulnerable to harvest longer than any other portion of the run. These fish are biologically unique to this area and are thus sensitive to too much harvest potential. The area between mile 46 – 47 is in this area and have been identified as one of the three areas with the highest density of spawners. These fish are particularly vulnerable during the staging and spawning time when they become protective of their area. These fish are generally in the late stages of their life and are not of good eating quality and would be better left alone to spawn and rear for future resource sustainability.

Proposal 156.... This is a KAFC proposal that would prohibit the harvest of King salmon in the Kenai River over 42 inches in length;

Many Pacific salmon research studies have identified the importance of the larger, older age class fish in the population to provide for the highest quality and quantity towards production and sustainability. Simply put, larger fish produce more eggs with a larger DNA footprint to give us the best chance at larger returns with more older age class fish. The Kenai River has a sport fishery with huge fishing power geared towards selective harvest of out bigger, older age class fish. King salmon research indicates that selective harvest of the older age classes can result in decreased fecundity, declines in abundance, increasingly male-biased sex ratios, fewer females, fewer older age class fish and trends towards smaller fish over time. Research also tells us that it will take multiple generations under a new selection regime with lower exploitation rates to reverse the effects of selective harvest of these fish. We are only going to see more demand in our King fisheries so we need to change our management philosophy before these effects become more paramount. For more pertinent information on this please see the proposal.

Proposal 157... This is a KAFC proposal that would still allow two Kings to be taken in the Kenai River, however, only one may be taken prior to July 1.

This is strictly an ER conservation proposal. The ER is in much worse shape than the LR with only about a 25 – 30 female return and only 4-5 1.4 age fish. The 20 year average return of ER 1.4 fish was around 40 until about 5 years ago. These fish also enter the river early and are vulnerable to harvest almost their entire river life so they need additional protection. For more pertinent information on this please see the proposal.

Proposal 159.... This is a proposal submitted by USF&W which seek to keep the slot limit 42 – 55in in effect through July 31 above Slikok Creek;

Currently the slot limit between Slikok Creek and Skilak Lk. ends July 14. This has never made any sense because right when the fish are in their staging and spawning locations and most vulnerable to harvest we allow all the big Kings that we previously protected to become



Proposal 160... This is another KAFC proposal that would eliminate the requirement in codified regulation that says bait shall be allowed after July 1st.

Current codified regulations require the department to start the LR King fishery with bait. In reaction to this requirement the commissioner has to EO a bait restriction on July 1st every year to start the LR out conservatively until they have some idea what the run strength looks like. It would be much better if this requirement was taken off the books and then allowed the department the leeway of deciding when it was appropriate to liberalize the fishery to bait. For more pertinent information on this please see the proposal.

Proposal 166.... This is also a KAFC proposal that seeks to close the river above the sonar site at mile 13.8 from July 1 – July 7 to give ER Kings that entered the river in late June a chance to move into the middle river above Slikok Creek. This proposal would also close the middle river to King fishing after July 15 to offer ER mainstem fish additional protection during the staging and spawning time.

Once again a conservation measure to offer more protection for ER Kings. See proposal for details.

Proposal 179... This is a KAFC proposal seeking another drift day on the river. We are asking for a Thursday drift boat day in addition to the Monday drift boat day that is already in place. This second drift day would be open to both guided and unguided fishermen.

This will be the 3rd time we have tried to get this proposal through because we think it would be good for the habitat and provide another enjoyable day free of most motor boat traffic. We also feel that if there was more drift boat opportunities then more folks might switch to the more habitat friendly drift boat option. This will probably become a more accepted alternative as more demand occurs and more habitat issues arise. For more pertinent information on this please see the proposal.

Proposals 182 (Ted Wellman) & Proposal 185 (Doug Wilson)... The intent of both of these proposals is to limit the guides to 6am – 6pm period;

As guide numbers increased to over 400 during the mid 2000s many private anglers left the King fishery because the guide activity on the river just became too much for them. They decided they would settle for the less hectic red, silver and rainbow fisheries. Then when the Kings declined after about 2007 many guides turned to the red and silver fisheries to diversify their businesses which was to be expected. The unintended consequence of this was that when they red fished off the bank they were no longer restricted to 6am – 6pm which was the common practice during King fishing. Nowadays, they can fish for reds 24/7 and many do which has put a strain on private folks that want to access the river for red fishing particularly in the evening hours. These proposals would limit the guides to conducting guide activities between 6am – 6pm. We hope this passes as it would mean a lot to private folks that feel like they are now getting run out of the red fishery as well.

Proposal 188 ... This is a KAFC proposal that seeks to make the entire Kenai River from the mouth upstream to Skilak lake a single hook fishery.

We don't see any reason why there is a need to use multiple hooks for any species of fish on the Kenai. The King fishery is already single hook and the damage caused to Coho and Rainbows by multiple hooks is no longer acceptable. Kings coming into the river at the beginning of the Coho fishery are harder to release if caught by gang hooks on a plug and can receive injuries that can cause increased mortality. The same for Rainbows that are caught with multiple hook plugs or caught on Coho gear. It just makes sense to incorporate this conservation measure. For more pertinent information on this please see the proposal.



Submitted By
Andy Hall
Submitted On
2/9/2017 10:08:24 PM
Affiliation
Kenai Peninsula Fishermen's Association

Dear Alaska Board of Fisheries Members,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954. We are a non-profit 501 (c) (6). We are primarily comprised of setnet salmon limited entry permit holders and in addition, we include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and other general interest in our membership. We primarily represent salmon setnet permit holders from Kachemak Bay to the Susitna River, from the West Side of Cook Inlet to East Side of the Cook Inlet, including generations of set net fishing families holding 734 Cook Inlet setnet permits. 82% of those permit holders are residents of the State of Alaska.

We encourage the board to carefully consider these proposals and how they will affect all user groups. We recognize and appreciate the value of each individual fisheries user group, and believe that despite the complexities of managing for so many users, there is strength in the diversities of our fisheries. We encourage the board to consider opportunity for each user group *relative to their direct affect on the resource*, and to help the Alaska Department of Fish and Game manage this resource for high sustained yields and commensurate with the best interest of Alaska and Alaskans.

Below is a summary of our positions on proposals. We look forward to discussing these issues further with each of you.

Thank you,

KPFA Board of Directors

Central District Drift Management Plan

Proposal 97 Repeal the drift and set gillnet one-percent rules that apply from August 1–15. **SUPPORT (See comments on Proposal 137)**

Kasilof Sockeye Salmon Management Plan

Proposal 100 Open the commercial set gillnet fishery in the Kasilof Section as early as June 20 if the department estimates 50,000 sockeye salmon will be in the Kasilof River before June 25. **SUPPORT. Historically this was treated as a hard trigger point, but in recent years the department decided to not utilize it at times with fairly weak justification. This time period has extremely good red to king ratios and is important for getting ahead of a chronically over escaping Kasilof run.**

Proposal 102 Amend management plan to allow commercial fishing with set gillnet gear in the Kasilof Section within one-half mile of shore and eliminate the provision allowing commercial fishing with set gillnet gear only within 600 feet of shore in the Kasilof Section. **OPPOSE**

Proposal 103 Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 and adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7. **OPPOSE There is no evidence that closure windows reduce king harvest.**

Proposal 105 Allow commercial fishing with set gillnet gear in the North Kalifornsky Beach statistical area (NKB - stat area 244-32) when the upper end of the Kasilof sockeye salmon escapement goal range is projected to be exceeded. **SUPPORT CONCEPT-Defer to proposal 136**

Proposal 108 Replace the Optimum Escapement Goal with the current Biological Escapement Goal for Kasilof River sockeye salmon. **SUPPORT The newer Kasilof BEG is higher, and provides plenty of room for management. The OEG is unnecessary and confusing.**

Proposal 110 Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one gillnet per limited entry permit held. **SUPPORT We believe that one net per permit was the original intent of the regulation.**

Proposal 111 Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one set gillnet per limited entry permit held. **SUPPORT We believe that 1 net per permit was the original intent of the regulation.**

Proposal 112 Allow holders of two Commercial Fisheries Entry Commission set gillnet limited entry permits to fish two set gillnets in the



Proposal 113 Remove restrictions on the amount of drift or set gillnet gear a vessel may have on board within the Kasilof River Special Harvest Area. **SUPPORT**

Proposal 114 Require all nets, buoys, ropes and anchoring devices to be removed from the Kasilof River Special Harvest Area when this area is closed to commercial fishing. **SUPPORT**

Proposal 115 Define the boundary that separates set gillnet from drift gillnet gear in the Kasilof River Special Harvest Area (KRSHA), and define the outside boundaries of the KRSHA. **SUPPORT**

Kenai River Late-Run Sockeye Salmon Management Plan

Proposal 117 Amend the Kenai River Late-Run Sockeye Salmon Management Plan to remove the optimum escapement goal for Kenai River late-run sockeye salmon. **SUPPORT The OEG adds confusion and complication to management. The inriver goal is superior because it allows managers to manage to an inseason goal without having to wait until harvest stats come in to determine whether or not the goal was achieved. Inriver goals allow inriver users harvest opportunity, and acknowledge that not all fish counted actually end up spawning. Inriver goals allow for harvest while still spreading spawning escapements out across the entirety of the yield-based SEG goals developed by ADF&G.**

Proposal 124 Amend the Cook Inlet Pink Salmon Management Plan to remove or lower the daily harvest triggers. **SUPPORT**

Proposal 125 Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery. **SUPPORT Special mesh size requirements precluding fishermen from using their normal gear results in low participation and under utilization in years of large pink salmon returns.**

Upper Cook Inlet Management Plan

Proposal 127 Remove inriver goals from the list of escapement goals in the Upper Cook Inlet Salmon Management Plan and realign inriver and escapement goals in the Kenai River Late-Run Sockeye Salmon Management Plan. **OPPOSE The inriver goal is superior to the OEG because it allows managers to manage to an inseason goal without having to wait until harvest stats come in to know whether or not the goal was achieved. Inriver goals allow inriver users harvest opportunities and acknowledge that not all fish counted actually end up spawning. Inriver goals allow for harvest while still spreading spawning escapements out across the entirety of the yield-based SEG goals developed by ADF&G.**

Proposal 128 Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **SUPPORT GENERAL CONCEPT**

Proposal 129 Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **SUPPORT GENERAL CONCEPT**

Cook Inlet Commercial Fishing

Fishing Districts and Gillnet Specifications and Operations

Proposal 131 Define commercial fishing statistical areas in the Upper Subdistrict set gillnet fishery. **SUPPORT**

Proposal 133 Allow a single person holding two Commercial Fisheries Entry Commission Cook Inlet drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear. **SUPPORT**

Upper Subdistrict Set Gillnet Fishery

Proposal 136 Allow commercial fishing with set gillnets in the North Kasilof Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8. **SUPPORT WITH AMENDMENT TO ELIMINATE UNNECESSARY GEAR RESTRICTITONS. We support the idea of a 600-foot fishery on North K-Beach to provide opportunity to the fishermen in that area. We feel that the gear restrictions in this proposal are unnecessary and it is unclear that they provide any additional protection to Kenai bound king salmon.**

Proposal 137 Remove "one-percent rule", where the commercial set gillnet fishery will close after July 31, if less than one percent of the season's total sockeye is harvested in two consecutive fishing periods. **SUPPORT The "one-percent rule" rule is punitive to the setnet Fishery and provides no benefit to the sportfishery. The Board of Fish set a season-closing date of August 15 for the setnet Fishery as a way of conserving Kenai-bound Coho salmon. The setnet Fishery fishes only regular periods between the 11th and 15th of August. A "one-percent rule" keeps the setnet fishery from harvesting the latter part of the sockeye salmon run, which is an important part of the season for those setnetters who continue to fish in August.**

Proposal 138 Remove the one-percent rule that applies to the commercial set gillnet fishery in the Upper Subdistrict after July 31 so that the set gillnet fishery will close August 15 and be managed using regular fishing periods from August 11 through August 15. **SUPPORT**



Proposal 139 Repeal the one-percent rule, as it applies to the Upper Subdistrict set gillnet fishery so that the set gillnet fishery will close August 15. **SUPPORT (See comments on Proposal 137)**

Proposal 140 Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth. **OPPOSE** *Due to questionable data that shallow nets have any conservation effect and the severe financial and logistical impact such a sweeping gear change would have on the fishery. Please see report titled "Oversimplification of complex harvest modeling issues outlined in Welch et al. (2014)"*

Please see the entire report here: <https://animalbiotelemetry.biomedcentral.com/articles/10.1186/s40317-015-0027-x>

An excerpt from that report's conclusion, written by the Alaska Department of Fish and Game, states, "We are concerned that this harvest modeling exercise paints an unrealistic picture of how simply changing gillnet dimensions would translate into a viable management approach to preserve or increase sockeye salmon harvests while minimizing Chinook salmon harvests."

Proposal 141 Limit the depth of all set gillnet gear in Upper Subdistrict of the Central District to no more than 29 meshes deep. **OPPOSE**
See comments on proposal 140.

Cook Inlet – Areawide Sport Fisheries

Proposal 14 Allow snagging for sockeye salmon in all Cook Inlet freshwater lakes (This proposal will be considered at the UCI and LCI meetings). **OPPOSE**

Proposal 34 Allow party fishing in Cook Inlet fresh and salt water for all species except king salmon (This proposal will be considered at the UCI and LCI meetings). **OPPOSE**

Proposal 146 Require the use of circle hooks when fishing for sockeye salmon. **OPPOSE**

Kenai and Kasilof Rivers Early-Run King Salmon

Proposal 147, 150 1 Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery. **NO ACTION SUPPORT IN CONCEPT**

Proposal 148 Rewrite the Kenai River and Kasilof River Early-run King Salmon Management Plan to redefine early-run stocks and establish age- and sex based escapement goals. **OPPOSE**

Proposal 149 Revise Kenai River and Kasilof River Early-run King Salmon Management Plan. **OPPOSE** *This proposal would increase effort and harvest on <30" fish. We understand the importance of large fish, however we are uncomfortable with assuming that small fish have no biological value, or with focusing harvest on small fish. Most scientific evidence supports broad harvest across the age/size/sex range of fish.*

Proposal 162 Establish an Optimum Escapement Goal for Kenai River late-run king salmon. **OPPOSE**

Proposal 163 Prohibit bait on runs less than 22,000 and eliminate 12-hour fishing period restriction. **SUPPORT** *Data provided in the large king goal memo (Fishery Manuscript Series No. 17-02 January 2017 Spawner-Recruit Analyses and Escapement Goal Recommendations for Kenai River Chinook Salmon by Steven J. Fleischman and Adam M. Reimer pp.58) shows that the average annual harvest of large kings from 2009-2011—75 cm METF and longer— by the Commercial setnet fishery is 2,281. The average annual Sport harvest for the same period is 6,994.*

The setnet fishery's harvest of large kings is 1/3 of sport harvest, yet the burden of conservation falls disproportionately on the setnet fishery during times of low abundance. We feel that the current paired restrictions are neither fair nor proportional to each fishery's impact on the stock, and violates the BOF's own, Board policy 93-145-FB Findings on policy for mixed stock salmon which says, "salmon resources should share in actions taken to conserve the resource in a manner which is, ideally, fair and proportional to respective harvest of the stock in question."

Please see the full policy here: <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff93145x.pdf>

Proposal 165 Decrease the trigger for management actions on Kenai River late-run king salmon from 22,500 to 16,500. **SUPPORT** *In light of the new goal this would roughly convert to lower bound of the current late run king goal.*

Proposal 168 Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery in July and August. **SUPPORT ONLY IF THE CURRENT MANAGEMENT PLAN DOES NOT CHANGE.**

Proposal 174 Remove provisions (e)(3)(A)(i) and (ii) that restrict the number and/or depth of commercial set gillnets fished by a Commercial Fisheries Entry Commission limited entry permit holder in the Upper Subdistrict if the use of bait is prohibited in the Kenai River sport fishery. **SUPPORT See our comments on Proposal 140.**



Proposal 175 Clarify the length and depth of set gillnets that may be used in the Upper Subdistrict commercial salmon fishery, if the use of bait is prohibited in the Kenai River sport fishery. **SUPPORT** We see this as a housekeeping proposal to clean up an unintended consequence of a poorly worded board generated proposal.

Kenai River Vessels and Habitat Restrictions

Proposal 180 Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15. **SUPPORT**

Proposal 191 Increase Kenai River coho salmon bag limit from two fish to three. **OPPOSE**

Proposal 202 Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August. **OPPOSE**

Proposal 203 Extend the season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon. **OPPOSE**

Proposal 204 Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park. **OPPOSE**

Proposal 205 Allow shore based personal use dipnetting in the Kenai River upstream to Skilak Lake. **OPPOSE**

Proposal 207 Amend the boundary description language for the area open to dipnetting in the Kaslof River personal use salmon fishery. **SUPPORT**

Northern District Commercial Salmon

Proposal 218 Allow a holder of more than one Commercial Fisheries Entry Commission set gillnet limited entry permit to fish with one set gillnet per permit held in the Northern District. **SUPPORT** *We believe that one net per permit was the original intent of the regulation.*

Proposal 237 Amend the regulations for the Anchorage Bowl Drainages to allow harvest of salmon, other than king salmon, that are less than 16 inches in length. **SUPPORT**



Submitted By
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Submitted On
2/9/2017 4:24:09 PM
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Dear Board Support;

For the upcoming 2017 BOF meeting on Upper Cook Inlet, the Kenai River Professional Guide Association formerly withdraws our support for our proposal 152.

Respectfully,

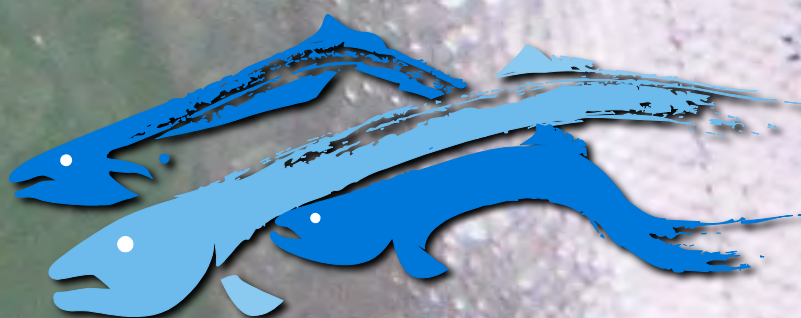
Gary Chamberlain, President

Kenai River Professional Guide Association



2017 UPPER COOK INLET FISHERY MANAGEMENT PROPOSALS & RECOMMENDATIONS

REPORT TO THE
ALASKA BOARD OF FISHERIES



KENAI RIVER SPORTFISHING
— ASSOCIATION —



Kenai River Sportfishing Association

KRSA is a membership-based, charitable non-profit, fishery conservation organization dedicated to preserving the greatest fishing river in the world – the Kenai – through program work in habitat protection, fisheries management, research, and angler education.

The association supports sustainable and balanced management of Upper Cook Inlet (UCI) sport, personal use, and commercial salmon fisheries based on sound science and verifiable studies. Toward this end, KRSA funds scientific research, seeks independent peer review of fishery management practices and proposals by scientific experts, and participates in public involvement processes for fish conservation and fishery regulation conducted by the Alaska Department of Fish and Game (ADF&G) and the Alaska Board of Fisheries (hereinafter referred to as the “Board”).

<i>KRSA Proposals</i>	<i>Pg.</i>
<i>#103 Expand use of Kasilof windows</i>	<i>15</i>
<i>#127 Correct Kenai sockeye inriver goals & clarify priority</i>	<i>18</i>
<i>#141 Limit set gillnet mesh depth</i>	<i>12</i>
<i>#149 Revamp Kenai Early-run King Salmon Management Plan</i>	<i>21</i>
<i>#162 Establish Optimum Escapement Goal for Kenai late-run king salmon</i>	<i>14</i>
<i>#191 Increase Kenai coho Salmon bag limit from two to three</i>	<i>24</i>
<i>#204 Extend upstream boundary of Kenai personal use boat fishery</i>	<i>26</i>



CONTENTS

I.	SUMMARY & RECOMMENDATIONS	4
II.	KENAI RIVER LATE-RUN SOCKEYE MANAGEMENT PLAN	6
III.	UPPER SUBDISTRICT SET GILLNET FISHERY	11
IV.	KENAI RIVER LATE-RUN KING SALMON MANAGEMENT PLAN	13
V.	KASILOF RIVER SALMON MANAGEMENT PLAN	15
VI.	CENTRAL DISTRICT DRIFT GILLNET FISHERY MANAGEMENT PLAN	17
VII.	UPPER COOK INLET MANAGEMENT PLAN	18
VIII.	KENAI EARLY-RUN KING SALMON MANAGEMENT PLAN.....	19
IX.	KENAI COHO SPORT FISHERY	23
X.	PERSONAL USE FISHERIES.....	25
XI.	KRSA POSITIONS	27
	Group 1 - Kenai Late-run Sockeye Management Plan & Set Gillnet Fishery.....	27
	Group 2 - Kenai River Late-Run King Salmon Management Plan.....	28
	Group 3 - Kasilof River Salmon Management Plan	30
	Group 4 - Central District Drift Gillnet Fishery Management Plan.....	31
	Group A - Cook Inlet Areawide & Northern Cook Inlet Sport Fisheries	32
	Group B - Fishing Districts, etc.....	33
	Group 5 – Kenai/ Kasilof King Sport Fisheries, Vessel/Habitat Restrictions & Guides	35
	Group 6 - Kenai, Kasilof, Russian River Sport & Personal Use	36
	Group 7 - Northern District Commercial & Susitna River Sport Fisheries	38
	Group 8 – Regulatory Alignment Sport Fishing	39
XII.	REFERENCES	41



I. SUMMARY & RECOMMENDATIONS

This booklet describes recommendations and proposals submitted by Kenai River Sportfishing Association (KRSA) for changes in management plans needed to address issues of particular concern to the sport and personal use fishery community of the Kenai region and Upper Cook Inlet.

Upper Cook Inlet supports some of the most complex mixed-stock, mixed species, multi-beneficiary salmon fisheries in Alaska. The Board of Fisheries has adopted a complex suite of regulatory plans to guide management of UCI. The various management plans are intricately connected such that even seemingly minor changes can have significant biological and allocation ripple effects. Current plans are the product of extensive policy deliberation, negotiation, refinement, and compromise. They reflect the historical wisdom of a series of fishery boards and a generation of sport and commercial fishery managers. However, management plans must continue to evolve to adapt to changing demands, conditions, unforeseen events, and new information.

Upper Cook Inlet salmon also support the largest public (non-commercial) fishery in the state whether measured by participation, harvest or economic value. Demand will continue to increase as the population and participation of Southcentral Alaska continues to grow. Commercial fisheries remain integral to the economy and social fabric of the local community. However, economic values of sport and personal use salmon fisheries now greatly surpass those of the commercial salmon fisheries by every available measure.

Allocation and management in UCI has long been dominated by commercial values. Management practices and priorities in UCI have been slow to respond to evolving needs. The state constitution mandates conservation of the fisheries resource and optimization of associated recreational, social and economic values. The constitutional goal of “maximum benefit” accruing from these common property resources is not nearly achieved by current salmon fishery management strategies.

There are three major issues before the Board at this meeting. Each of these issues has inlet-wide implications for the sustainability of species and stocks. Each potentially impacts many, if not most fisheries. These three issues are:

1. Establishing appropriate escapement goals and management objectives for Kenai River late-run sockeye.
2. Management of Kenai River king salmon fisheries in the transition to a large fish escapement goals.
3. Continuing implementation of the Conservation Corridor concept within the Central District Drift Gillnet Fishery Management Plan.



To address these issues, KRSA offers the following proposals and recommendations:

Kenai River Late-Run Sockeye Management Plan

1. Realign inriver and escapement goals to current sport harvest levels above the sonar in order to ensure that escapements are distributed throughout the OEG and avoid continuing confusion over priorities of related goals [Proposal #127].

Upper Subdistrict Set Gillnet Fishery

2. Limit set gillnet mesh depth to no more than 29 meshes in order to reduce incidental harvest of king salmon [Proposal #141].

Kenai Late-run King Salmon Management Plan

3. Revise management triggers with equivalent large fish values consistent with the revised SEG identified by ADF&G.
4. Maintain paired restrictions which are essential for sharing the conservation burden during periods of low king abundance.
5. Establish an OEG of 13,500 – 36,000 large kings consistent with the sport priority of this stock [Proposal #162].

Kasilof River Salmon Management Plan

6. Provide adequate protection of Kasilof king escapement by increased use of no-fishing windows in the Kasilof area set gillnet fishery [Proposal #103].

Central District Drift Gillnet Fishery Management Plan

7. Continue to employ the expanded terminal harvest areas as a conservation corridor for northern inlet salmon in order to focus commercial harvest on Kenai and Kasilof sockeye.

Upper Cook Inlet Management Plan

8. Drop “inriver goal” from the list of escapement goals in 21.363(e) to protect ADF&G from having to make allocative in-season decisions on out-of-plan priorities [Proposal #127].

Kenai Early-run King Salmon Management Plan

9. Continue to manage for a precautionary OEG. KRSA proposes an OEG of 3,700 to 7,000 based on the large fish standard recommended by ADF&G (MEF ≥ 75 cm).
10. Establish a “step-up” regulatory strategy to manage for the historical escapement range, fish conservatively at low run sizes, and provide fishery opportunity based on abundance [Proposal #149].

Kenai Coho Sport Fishery

11. Increase coho daily bag and possession limit in the Kenai River from two fish to three fish beginning on the day after the closure of the set net fishery in the Upper Subdistrict [Proposal #191].

Personal Use Fishery

12. Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park [Proposal #204].
-

II. KENAI RIVER LATE-RUN SOCKEYE MANAGEMENT PLAN

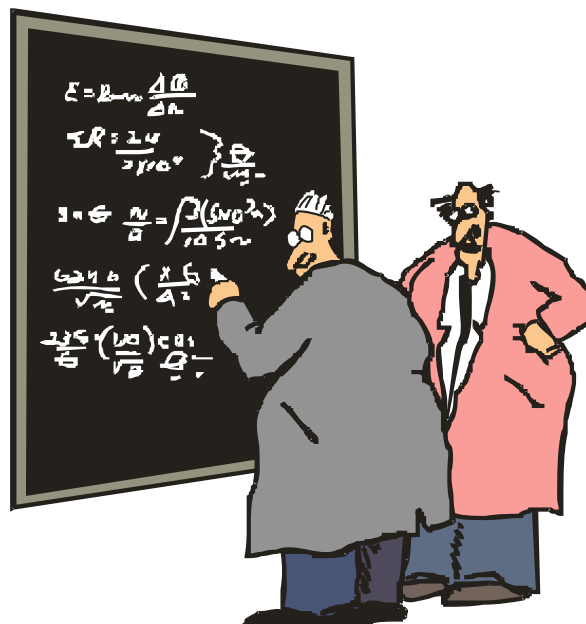
Inriver goals are out of alignment with the Sustainable and Optimal Escapement Goals for Kenai Late Run Sockeye Salmon

Background

Three types of numerical goals are identified for Kenai late-run sockeye salmon:

Sustainable Escapement Goal (SEG) – Spawning escapement demonstrated to produce high levels of sustained yield in analysis of historical stock-recruitment data.

Optimal Escapement Goal (OEG) – For Kenai late-run sockeye, this takes the form of an allowance of an additional 200,000 above the upper end of the SEG. This addition protects other salmon stocks from overfishing in the mixed stock and species commercial fisheries during years of high Kenai sockeye runs. The OEG has been in place since 1999 and recognizes that large escapements continue to provide large returns.



Inriver Goals – Measured at the sonar, these goals are designated for three run size tiers in order to distribute escapements throughout the escapement goal range and share the bounty of large runs among fisheries.

Only the OEG and the inriver goals are explicitly referenced in the management plan [5 AAC 21.360]. Relative priorities of goals are also addressed in the umbrella plan [5 AAC 21.363(e)].

Table 1. Kenai Late-run sockeye salmon goals.

	Run size	Lower	Upper
SEG	--	700,000	1,200,000
OEG	--	700,000	1,400,000
Inriver goal (at sonar)	< 2.3 million	900,000	1,100,000
	2.3 – 4.6 million	1,000,000	1,200,000
	> 4.6 million	1,100,000	1,350,000

Misaligned Goals

ADF&G submitted proposal #116 requesting that the Board review the OEG and inriver goals. The OEG and inriver goals are currently in conflict. The inriver goal ranges do not currently provide enough fish on the upper end to adequately distribute escapements throughout either the SEG or OEG at current sport fishing levels upstream from the sonar.

The misalignment results from growth of the sport fishery for sockeye salmon upstream from the sonar since the inriver goals were first adopted. During the 1990s, upriver sport harvest of sockeye typically averaged about 150,000 per year (Figure 1). The upper end of the inriver goals (1,350,000) was simply the top end of the SEG (1,200,000) plus a sport harvest of 150,000. Since 2000, the sport fishery has demonstrated the capability of harvesting many more sockeye above the sonar with harvests averaging over 250,000 per year and reaching 380,000.

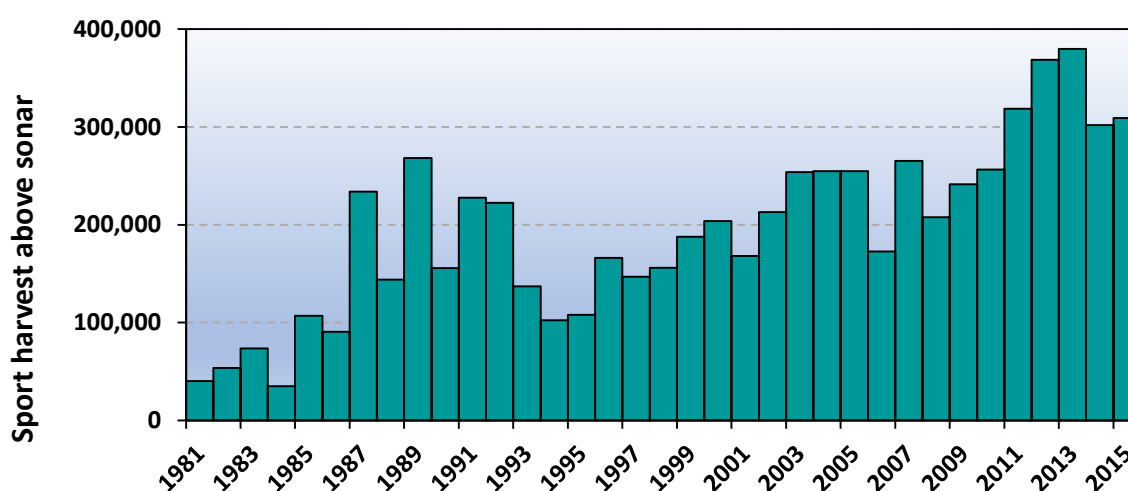


Figure 1. Sport harvest of Kenai late-run sockeye upstream from the sonar assessment site.

Figure 2 illustrates the problem. Current inriver goals produce escapements well below the upper ends of both the SEG and OEG where the fishery is effectively managed for the current inriver goals. We are managing on paper for escapements in the low range of the SEG.

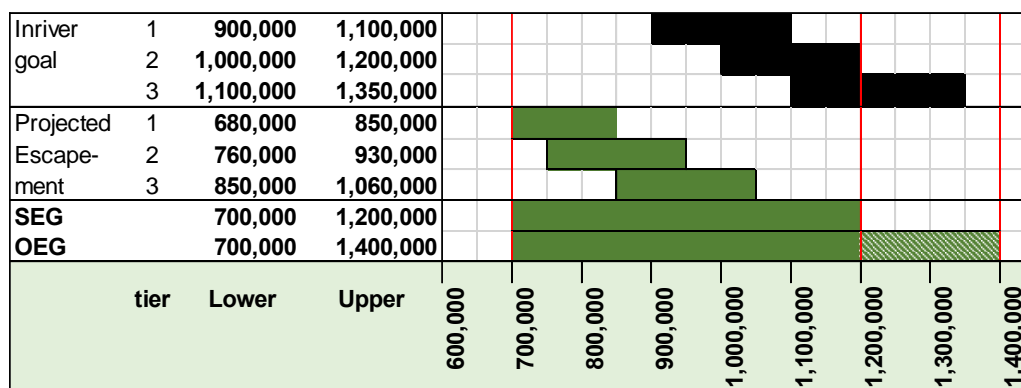


Figure 2. Escapement goals, inriver goals and projected escapements at current levels of sport harvest upstream from the sonar. (Current harvests derived from 2007-2015 numbers identified in Figure 3 regression line).

Harvest above the sonar increases with abundance (Figure 3). This relationship should be taken into account when correcting inriver goal ranges. Figure 3 also highlights the increase in upriver sport harvest of sockeye in the recent time frame.

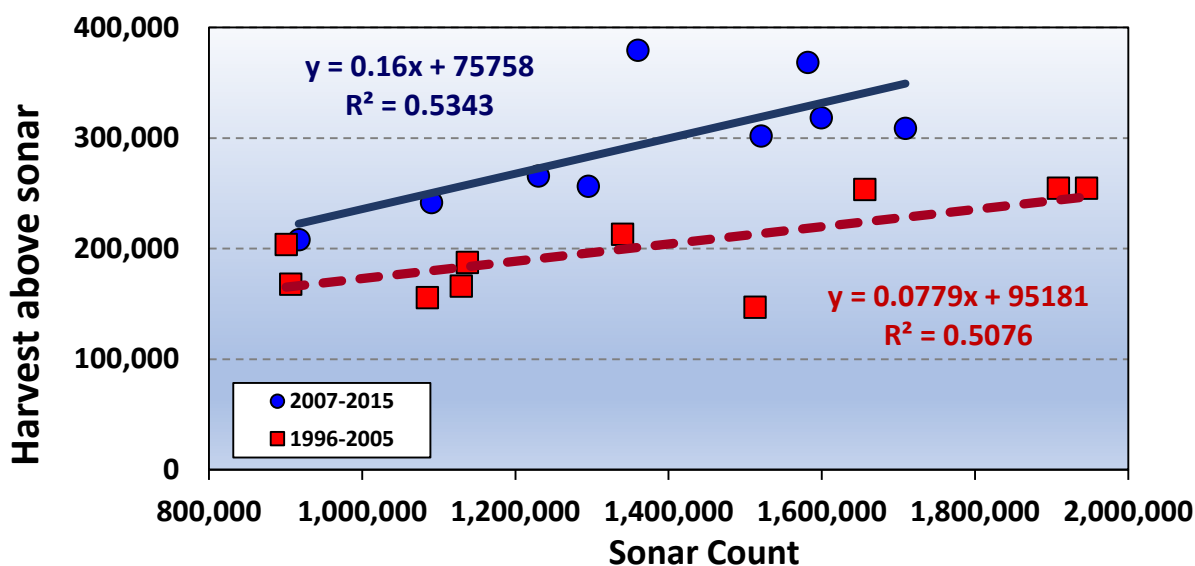


Figure 3. Current and historical relationships between sockeye sonar counts and upstream sport harvest. (2006 is omitted as an outlier due to record 11 days late sockeye run timing.)

Related Issues

Narrow Inriver Goal Ranges: Fishery management is a shotgun, not a rifle. Narrow inriver goal ranges (only 200,000-250,000 fish wide) are very difficult to hit due to uncertain run forecasts and variable run timing. Narrow targets subject managers to unfair criticism for subjective run size calls and “missed” goals even when overarching escapement goals are achieved. Wider goal ranges would recognize practical management capabilities.

Inconsistency with the OEG: The OEG allows for larger Kenai sockeye escapement during big run years to prevent overharvest of other stocks and species. Kenai late-run sockeye are extremely productive. When runs exceed 4 million, an exploitation (harvest) rate of 70% or more is necessary if management is directed to avoid exceeding the escapement goal. No other stock of sockeye, coho, chum or Chinook salmon present in the marine waters of UCI at the same time as late-run Kenai sockeye can sustain exploitation within this range. Few, if any, of the other fishery objectives, be they escapement goals or fishery performance metrics, can be realized at the same time that fishery management is attempting to exploit Kenai sockeye at very high levels.

Management Plan Conflicts: Problems caused by misaligned goals are compounded by provision 5 AAC 21.363(e) in the UCI umbrella management plan which allows sections of other management plans to be set aside when inriver goals for Kenai sockeye are being exceeded. This places ADF&G in the position of having to make allocative out-of-plan in-season management decisions which are more properly the purview of the Board (See Section VII).

Options

We identify two options for correcting inriver goals to distribute escapements through the OEG:

Option A – expands inriver goal ranges to evenly distribute escapements throughout the existing OEG range. This option assumes sport harvests above the sonar ranging from 220,000 to 360,000 (based on the relationship documented in Figure 3 above).

Option B – similar to Option 1 except the upper ends of every run size tier are standardized at the same level as the upper tier in Option 1. This option recognizes the practical difficulty of managing for narrow inriver goal ranges and reduces the impetus for subjective and allocative in-season decisions to set aside elements of other plans.

Table 2. *Options for correcting inriver goals of Kenai late-run sockeye for current sport fishery harvest levels upstream from the sonar (numbers in thousands).*

	Tier	Inriver goal		Harvest		Escapement	
		Lower	Upper	Lower	Upper	Lower	Upper
Opt.A	1	900	1,250	220	280	680	970
	2	1,100	1,450	250	310	850	1,140
	3	1,300	1,750	280	360	1,020	1,390
Opt.B	1	900	1,750	220	360	680	1,390
	2	1,100	1,750	250	360	850	1,390
	3	1,300	1,750	280	360	1,020	1,390

KRSA Recommendations

1. Retain the current OEG in regulation (700,000 – 1,400,000) to prevent overharvest of other stocks and species in years of very large Kenai sockeye returns
2. Realign inriver and escapement goals for current sport harvest levels above the sonar to ensure that escapements are distributed throughout the OEG and avoid continuing confusion.
3. Establish the following inriver goals (Option B identified above):

Tier 1 (< 2.3 million)	900,000 to 1,750,000
Tier 2 (2.3 – 4.6 million)	1,100,000 to 1,750,000
Tier 3 (> 4.6 million)	1,300,000 to 1,750,000

Myth: Current management plans produce disastrous sockeye “overescapements.”

Fact: “Overescapement” arguments are largely an effort to establish a biological rationale for allocative strategies favoring the commercial fisheries.

Overescapement of Kenai late-run and Kasilof sockeye has proven to be a problem more in theory than in practice. While inriver goal ranges established for the Kenai sockeye sonar are regularly exceeded, total escapements consistently fall within the OEG range.

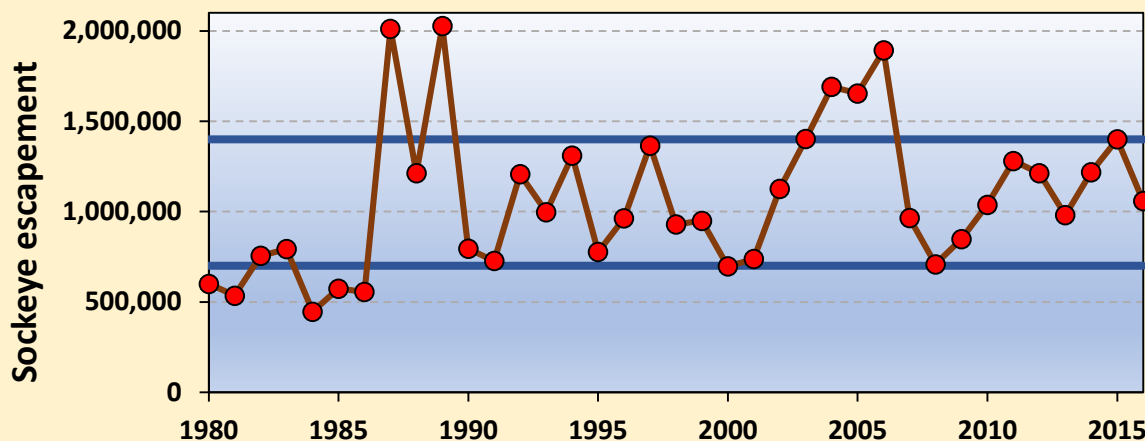


Figure 4. Historical escapements of Kenai late-run sockeye relative to the OEG adopted in 1999.

It is clear that Kenai sockeye continue to produce large returns even when current escapement goals are exceeded. No escapement has ever failed to replace itself. Successive large escapements from 2004-2006 had some people predicting imminent disaster which never occurred. These brood years produced some of the largest runs in the over 20 years.

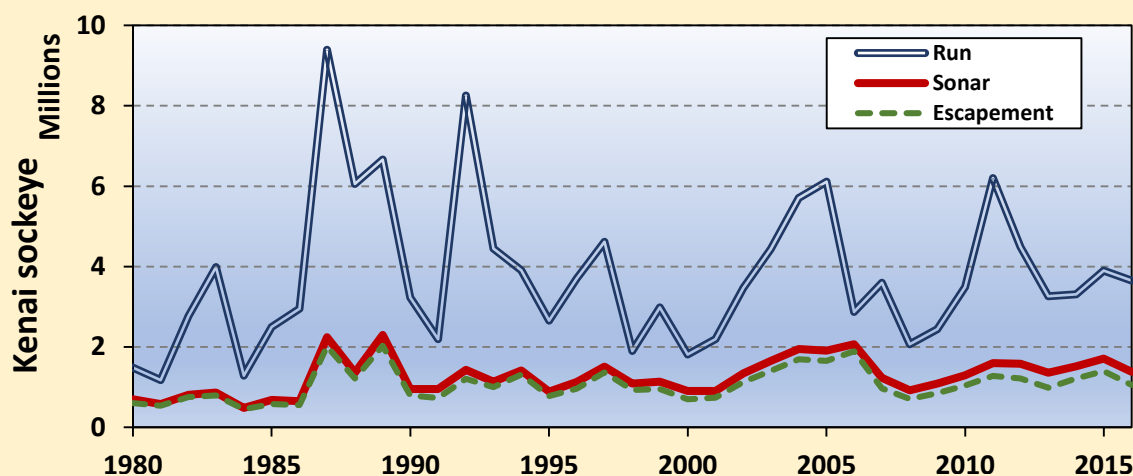


Figure 5. Historical run size, sonar count and escapement of Kenai late-run sockeye.

Kenai and Kasilof sockeye already sustain some of the highest exploitation rates (70%+) of any wild stock of sockeye Alaska (Clark et al. 2007). That is not even considering significant harvest recently documented at Kodiak (Shedd et al. 2016). Managing with even higher exploitation rates to contain escapement is simply not a prudent practice for sustainability.

III. UPPER SUBDISTRICT SET GILLNET FISHERY

East Side set gill net fisheries targeting sockeye continue to take thousands of sport-priority king salmon

Background

- ❑ UCI regulations currently allow nets up to 45 meshes deep. Shallower set nets have the potential to focus harvest on sockeye while reducing harvest of kings.
- ❑ Many commercial fishers recognize the potential benefits of using shallower gill nets to increase fishery selectivity for sockeye, as evidenced by other proposals before the Board.
- ❑ Shallower nets are used in other Alaska commercial fisheries including Bristol Bay where a 29-inch mesh regulation has been in place in since at least the 1970's [5 AAC 06.331].
- ❑ Chinook salmon are widely reported to run deeper than most other species in commercial fisheries from Alaska to the Columbia River.
- ❑ ADF&G does not currently have the authority to restrict set net gear except in limited cases.

Myth: Commercial fishery impacts on Kenai and Kasilof Late-run kings are insignificant.

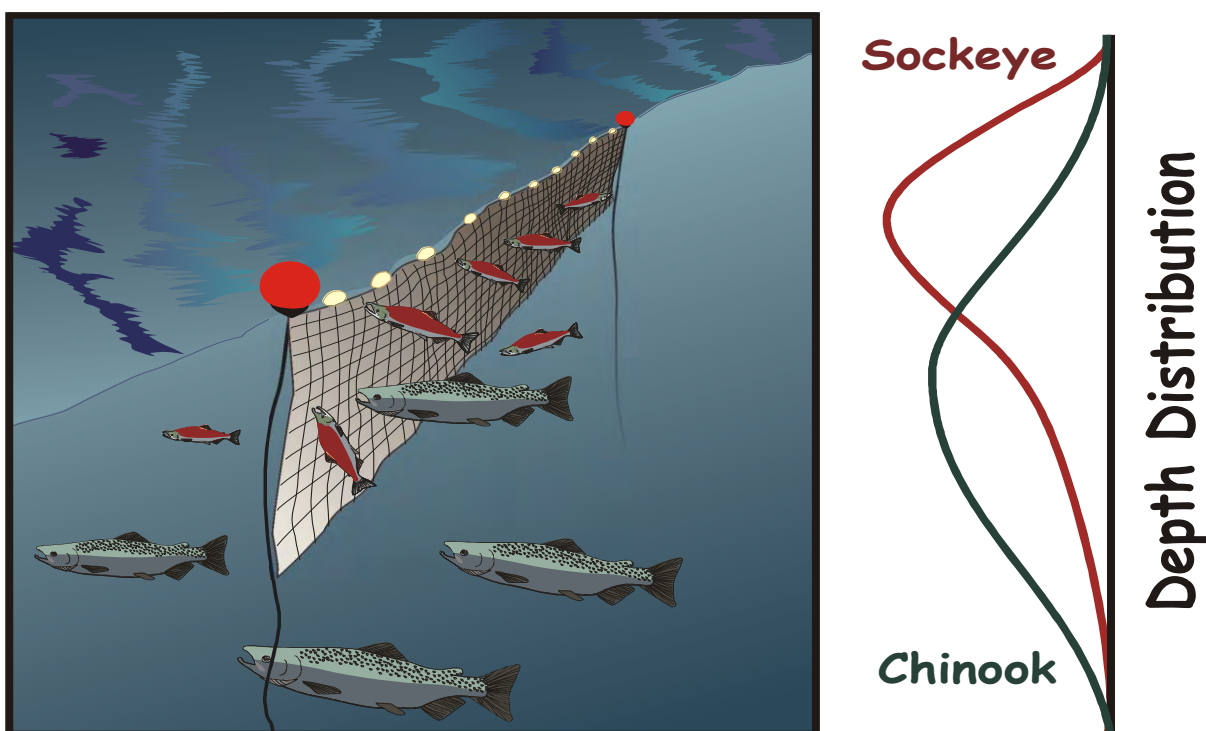
Fact: Commercial harvest patterns determine the success of all other fisheries operating in their shadow.

Commercial gillnet fisheries are extremely effective harvesters of UCI salmon including millions of sockeye and many thousands of comingled kings and coho. ADF&G harvest data shows that the east side set gillnet (ESSN) fishery consistently harvests more Kenai and Kasilof-bound king salmon than the respective inriver sport fisheries (Eskelin et al. 2013; Eskelin & Barclay 2014, 2015; SWHS 2017) in spite of the UCI sport fish priority for king salmon.

The ESSN fishery typically harvests close to half of the total sockeye run reaching the beach and much more during intensive fishing periods. We also know that sockeye generally move onshore and into the rivers with little delay while kings may linger in the fishery area for days before entering freshwater. It is impossible to reconcile claims of low exploitation on kings in this fishery with everything else we know. Assertions to the contrary are quite simply inaccurate and intentionally misleading.

Issue

- ❑ Research conducted in UCI by Bethe and Hansen (1998) and Welch et al. (2014) indicated that shallower nets can increase fishery selectivity for sockeye relative to kings.
- ❑ Study methodologies do not provide sufficient information to effectively quantify benefits of shallower nets in terms of king savings.
- ❑ However, the facts that kings tend to run deeper than sockeye and shallower nets have the potential to reduce king catches relative to sockeye are beyond dispute.
- ❑ Despite the potential benefits of shallower nets, ADF&G has not implemented meaningful tests of this alternative gear.



KRSA Proposal (#141) - Limit set gillnet mesh depth

No more than 29 meshes in the Upper Subdistrict of the Central District.

IV. KENAI RIVER LATE-RUN KING SALMON MANAGEMENT PLAN

Plan revisions are needed to address ADF&G's transition to a large fish goal

Background

- ❑ ADF&G has recommended revision of the current SEG based on all king sizes with a goal based only on large fish 75 cm MEF (mid-eye to tail fork length) (Table 3).
- ❑ This includes kings approximately 33.3 inches in total length and greater. On average, large fish comprise approximately 90% of the total run and include practically all of the females.
- ❑ This change is due to difficulties in estimating numbers of small kings (<75 cm MEF) with sonar and inriver netting programs.

Table 3. *Summary of previous (2016) and revised (2017) sustainable escapement goals (SEG) for Kenai River late-run king salmon (Fleischman & Reimer 2017).*

	Sizes	SEG	In-plan Triggers	
Previous (2016)	All	15,000 – 30,000	16,500 ^b	22,500 ^c
ADF&G 2017 Revision	≥75 cm MEF ^a	13,500 – 27,000	(14,850 ^d)	(20,250 ^d)

^a Mid-eye to tail fork measurement.

^b 1,500 fish higher than the OEG, accounting for uncertainty in ability to project run size.

^c Mid-point between upper and lower bounds of the SEG.

^d Equivalent values in large fish units based on 90% of all-size values (estimates by KRSA).

Issue #1 – Trigger Point Revisions

Reference values for implementation of paired restrictions need to be revised for consistency with the large fish goal. Paired restrictions share the conservation burden for Kenai king salmon among sport, commercial and personal use fisheries during periods of low king abundance. Without paired restrictions, both the sport and commercial fishery are powerful enough to jeopardize escapement at low levels of abundance and to force each other into closure. Paired restrictions were adopted in a serious effort to prevent the disastrous fishery closures experienced in the past and have proven successful in that regard.

KRSA Recommendations

1. We support transition to a large-fish goal to ensure adequate spawning escapements and reduce assessment uncertainty.
2. Management triggers in the Kenai late-run king salmon plan should be revised with equivalent large fish values identified in Table 3.
3. Paired restrictions during times of low king abundance are essential for continuing to preserve the delicate balance of benefit and burden of conservation between commercial, sport and personal use fisheries.

Issue #2 – Management Priorities During Strong King Runs

Management substantially reduces sport fishery opportunity and values when commercial fishery tools are used to reduce inriver runs of Kenai kings at higher run sizes. Such management is inconsistent with the sport fishery priority for this species.

Higher inriver runs produce tremendous sport fishery benefits with no significant impact on future production for total escapements up to 40,000 (36,000 fish ≥ 75 cm MEF). Returns from all historical escapements below 36,000 fish ≥ 75 cm MEF exceeded replacement and produced substantial yields on average according the Department's recent escapement goal analysis (Fleischman & Reimer 2017). There was no significant correlation of returns to total escapements between 22,500 and 40,000 (20,250 to 36,000 fish ≥ 75 cm MEF).

The top end of the SEG for Kenai late-run king salmon is less than the historical average escapement. A higher upper goal is needed to avoid managing for escapements less than the historical average escapement. This is true for both all-size and big fish goals.

When escapements are projected to exceed the upper end of the SEG but still fall within the range of historical average, no management action in addition to the normal fishing regulatory regime should be taken to further reduce the escapement.

KRSA Proposal (#162) - Kenai late-run King Optimum Escapement Goal

Establish an Optimum Escapement Goal (OEG) as follows:

	Sizes	SEG	OEG
Previous (2016)	All	15,000 – 30,000	15,000 – <u>40,000</u>
ADF&G 2017 Revision	≥ 75 cm MEF	13,500 – 27,000	13,500 – <u>36,000</u>

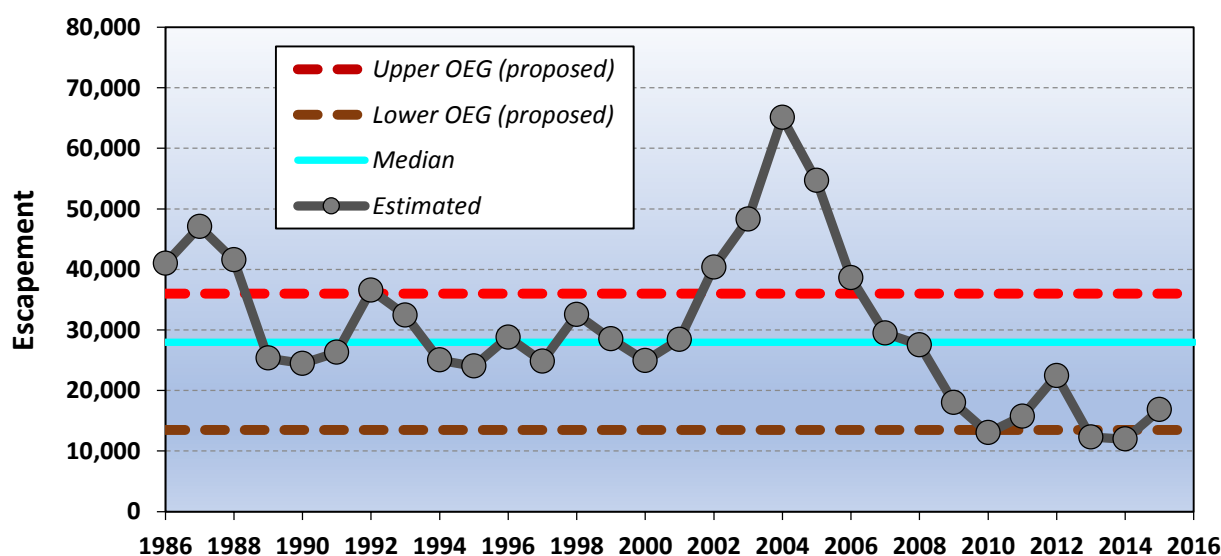


Figure 6. Historical escapements of large (≥ 75 cm MEF) late-run Kenai king salmon relative to the OEG proposed by KRSA.

V. KASILOF RIVER SALMON MANAGEMENT PLAN

Current plans do not provide adequate protection for Kenai or Kasilof late-run kings during years of large Kasilof sockeye returns

Background

- ❑ From the beginning of the fishing season through July 7, the set net fishery in the Kasilof section is regulated by the Kasilof River Salmon Management Plan.
- ❑ After July 7, the Kasilof section is governed by the Kenai River Late-Run Sockeye Salmon Management Plan.
- ❑ Windows are periodic, regular closures in commercial fisheries designed to pass fish for escapement and harvest by inriver fisheries.
- ❑ Under most conditions, the Kenai sockeye plan provides for two commercial closure windows. However, the Kasilof sockeye plan provides only one commercial closure window.
- ❑ No windows are specified in current plans for the Kasilof River Special Harvest Area (KRSHA) which is being fished intensively in recent years.

Issue

Current management fails to provide adequate protection for Kasilof late-run kings. Genetics data shows that the Kasilof supports a substantial run of late-run kings and a significant portion of the set net harvest. There is currently no basis for in-season management of Kasilof king salmon. Run strength is not assessed nor have escapement goals been identified.

Kenai kings are also subject to substantial harvest in the Kasilof section set gillnet fishery. New telemetry data shows that most Kenai kings are passing directly through the Kasilof section as they move and mill northward along the coast (Welch et al. 2014).

Intensive fishing in the KRSHA at the river mouth substantially impacts escapement of Kasilof kings and counteracts benefits of district-wide limitations on set net fishing time.

KRSA Proposal (#103) - Expand use of Kasilof windows

Provide adequate protection of Kasilof king escapement by increased use of no-fishing windows in the Kasilof area set gillnet fishery.

1. Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 (in addition to the current 36-hour window at the end of the week).
2. Adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7, the same as those found in the Kenai River late-run sockeye management plan.



Explanation

Windows pose no significant risk to Kasilof sockeye production. Robust sockeye returns continue despite escapements that regularly exceed established escapement goals. No escapement since 1985 has failed to replace itself. In fact, the recent record escapement of 522,000 in 2004 produced a 1.5 million sockeye return (4th largest in 40 years).

The Kasilof River Special Harvest Area (KRSHA) at river mouth was intended to target Kasilof sockeye as a last resort when escapements are large. This area was rarely used before 2005. Subsequent use proved unpopular with both commercial and inriver users and led the BOF to direct that other measures be used in priority to the special harvest area. Unfortunately, the KRSHA has been heavily fished in recent years with continuing strong Kasilof sockeye runs.

The KRSHA harvests significant numbers of king salmon. King catches in the Kasilof sport fishery drop way off during periods of intensive fishing in the special harvest area. Escapements must be declining accordingly. Extensive use of the special harvest area must be limited in order to protect escapement of Kasilof late-run king salmon. ADF&G does not enumerate Kasilof king salmon. Hence, per the Statewide Sustainable Salmon Policy, conservative, precautionary management is warranted.

Myth: Windows don't work because of unpredictable sockeye movement patterns.

Fact: Windows deliver significant numbers of sockeye and kings to rivers during periods when salmon are moving through the inlet.

Windows are working as intended in UCI. They interrupt sustained periods of set net fishing along the east-side beaches to reduce unpredictable boom or bust patterns in inriver returns that severely impact personal use and sport fisheries.

While windows cannot guarantee delivery of fish to the rivers when fish aren't moving, this in no way counters their value. However, the lack of fishery windows can practically eliminate periodic large influxes of salmon into the rivers as the historical management practice often involved extended periods of intensive commercial fisheries across the peak of the sockeye run. Intensive commercial fisheries have the effect of keeping the inriver fisheries off balance and severely limiting opportunities to access a reasonable share of the common property sockeye salmon resource.

Windows also provide significant biological benefits by protecting escapement of stocks that are not monitored in-season (i.e. Kasilof late-run kings) and protecting the inherent genetic and life history diversity of stocks across the duration of the run.

Initial concern that windows would either unnecessarily constrain management flexibility to attain escapement goals or increase the chances of missing unpredictable large pulses of fish onto the beach, into the river, and over the escapement goal, have not been realized.



VI. CENTRAL DISTRICT DRIFT GILLNET FISHERY MANAGEMENT PLAN

The data show clear benefits of the conservation corridor for northern-bound salmon with minimal impact on commercial fishery value

Background

- ❑ The “conservation corridor” regulation provides strategic time and area closures in the center of Cook Inlet and expands use of terminal fishing areas based on abundance of the Kenai and Kasilof sockeye.
- ❑ These regulations are designed to pass additional sockeye and coho through marine waters of the Central District, into northern rivers and streams to provide adequate escapements and produce a successful sport fishery for coho in most years.
- ❑ This regulation was adopted by the 2011 Board and revised in 2014 by unanimous 7-0 vote. Six years of data are now available on corridor effectiveness (MSBFWC 2017; Willette & Dupuis 2017).

Issue

The Drift Gillnet Fishery is the most powerful and mobile of all commercial fisheries in the UCI. Within the Drift Gillnet Fishery Management Plan, a conservation corridor is established through the use of strategic time and area closures. The expressed purpose of this is to facilitate passage of a variable proportion of sockeye and coho salmon bound north, through the marine waters of the Central District to the Northern District of UCI to regularly achieve escapement and fishery performance objectives.

The drift gillnet fishery of the central district is the most powerful and mobile of all commercial fisheries in UCI. The drift gillnet fleet is the primary harvester of north-bound salmon. Commercial interception of northern inlet sockeye and coho dwarfs harvest of these stocks in upstream sport fisheries. Susitna sockeye Salmon are currently designated as a stock of yield concern. Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.

KRSA Recommendations

KRSA strongly supports continued use of the expanded corridor as a tool to focus commercial harvest of Kenai and Kasilof sockeye within a more terminal area.

The Conservation corridor is based upon the best available biological information. While it is not expected that results will be similar from year to year, observations over the years of record provide significant support of the success of the conservation corridor in achieving its stated objectives (MSBFWC 2017; Willette & Dupuis 2017).



VII. UPPER COOK INLET MANAGEMENT PLAN

A small revision to this plan is necessary to protect ADF&G from having to make in-season out-of-plan allocation decisions that are the purview of the Board

Background

- ❑ The Upper Cook Inlet Management Plan [5 AAC 21.363}, commonly known as the “Umbrella Plan,” provides general management considerations for all UCI salmon plans.
- ❑ Specific management actions are identified in a complex of detailed management plans and elements of one plan, on occasion, conflict with elements found in another.
- ❑ During its 2008 meeting, specific regulatory language was adopted in the Umbrella Plan to provide guidance when objectives or prescriptive tools of one management plan conflict with or compromise the department’s ability to direction of another plan.
- ❑ The revision recognized the commissioner’s emergency order authority to meet established escapement objectives as the primary management objective.
- ❑ This allows ADF&G to go outside other management plans and effectively prioritizes escapement goals (including inriver goals) over other provisions such as windows, allocations, or time and area restrictions.

Issue

The escapement goal priority protects long-term sustainability and yield of salmon. However, including inriver goals elevates commercial management for sockeye MSY over other escapement and allocation objectives developed to optimize sustained yields of mixed species and stocks. Out-of-plan actions triggered by inriver goals, conflict with management intent for other stocks including Kenai kings and Susitna sockeye. This occurs even when Kenai sockeye escapements are still comfortably within the OEG.

Inriver goals are allocative targets designed to distribute harvest among commercial and inriver fisheries. Out-of-plan actions inevitably impact the allocation balance among commercial drift, commercial set gillnet, personal use, and sport fisheries. This places the Department in the no-win situation of having to decide between one set of allocative targets and similarly allocative out-of-plan actions. Allocation decisions are the responsibility of the Board, not the Department.

KRSA Proposal (#127) – Priority of Kenai late-run sockeye inriver goals*

Drop “inriver goal” from the list of escapement goals in 21.363(e)

Inriver goals are allocative in nature and the department should not be put in a position of favoring one allocation strategy over another without consultation with the Board. The Kenai River is the only location in the state where inriver goals exist in regulation.

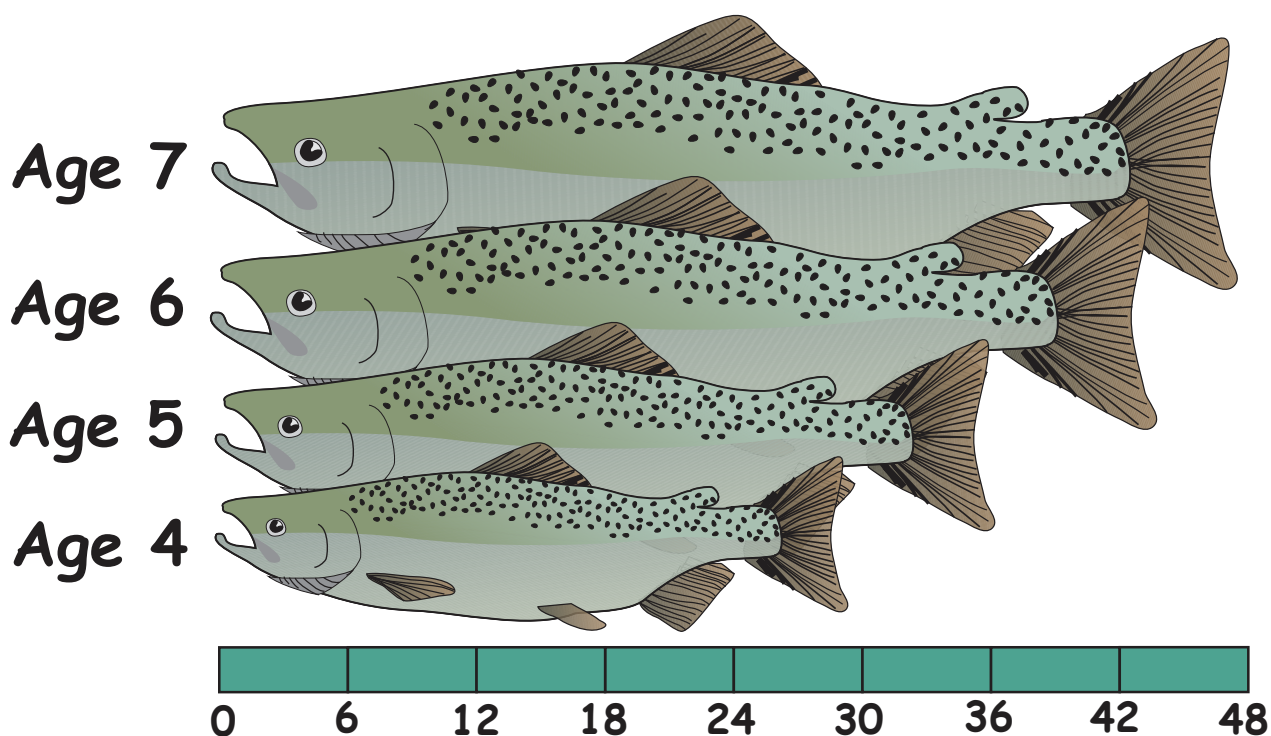
** Proposal 127 also addresses realignment of inriver and escapement goals which is the subject of ADF&G’s proposal #116 (See Section II).*

VIII. KENAI EARLY-RUN KING SALMON MANAGEMENT PLAN

This management plan as written is inconsistent with its stated objectives

Background

- ❑ ADF&G has recommended revision of the current SEG based on all king sizes with a goal based only on large fish 75 cm MEF (mid-eye to tail fork length).
- ❑ The plan currently identifies an OEG that was created and adopted by the BOF to provide additional protection to early-run fish and to manage for an escapement objective based on maximum sustained production, a goal more complementary to sport fisheries.
- ❑ Section (b) of the plan directs that the fishery be managed “to ensure the age and size composition of the harvest closely approximates the age and size composition of the run.
- ❑ This management plan includes a unique size slot limit which restricts harvest to fish less than 42 inches, total length. This regulation was originally adopted in response to a long-term decline in the relative abundance of large fish and concern for sport fishery selectivity for large fish.
- ❑ The Kenai early run king sport fishery has been closed or severely restricted over the last few years during a period of unfavorable environmental conditions for Chinook stocks across the North Pacific from Yakutat to Kamchatka.



Issue #1 – Escapement Goal Revisions

The OEG in the current management plan needs to be revised for consistency with the currency of the new SEG based on large fish. A consistent OEG based on the large fish standard will ensure that management remains precautionary during periods of low abundance.

KRSA Recommendations

1. We support transition to a large-fish goal to ensure adequate spawning escapements and reduce assessment uncertainty.
2. This stock should continue to be managed for a precautionary OEG consistent with historical practice and substantial uncertainty in historical assessment data.
3. We propose a new OEG of 3,700 to 7,000 fish ≥ 75 cm MEF (as described below).

Explanation

The lower end of KRSA's recommended OEG is equivalent in large fish units to the current OEG. The upper end is higher than the large fish translation of the current goal. This increase provides a wider management target consistent with current limitations in run size forecasting and projection for this stock. This range also maximizes recruitment as per Fleischman & Reimer (2017). The proposed upper end is equivalent to the 80th percentile of historical escapements.

Table 4. Summary of previous (2016) and revised (2017) sustainable escapement goal (SEG) for Kenai River early-run king salmon (Fleischman & Reimer 2017).

	Sizes	SEG	OEG
Previous (2016)	All	3,800 – 8,500	5,300 – 9,000
ADF&G 2017 Revision	≥ 75 cm MEF ^a	2,800 – 5,600	(3,700 – 6,300 ^b)
KRSA Recommendation	≥ 75 cm MEF ^a	"	3,700 – 7,000 ^c

^a Mid-eye to tail fork measurement.

^b Equivalent to previous OEG in large fish units based on 70% of all-size values (KRSA estimate).

^c Higher upper limit provides broader goal range, where additional fish has been shown to not adversely impact future yield.

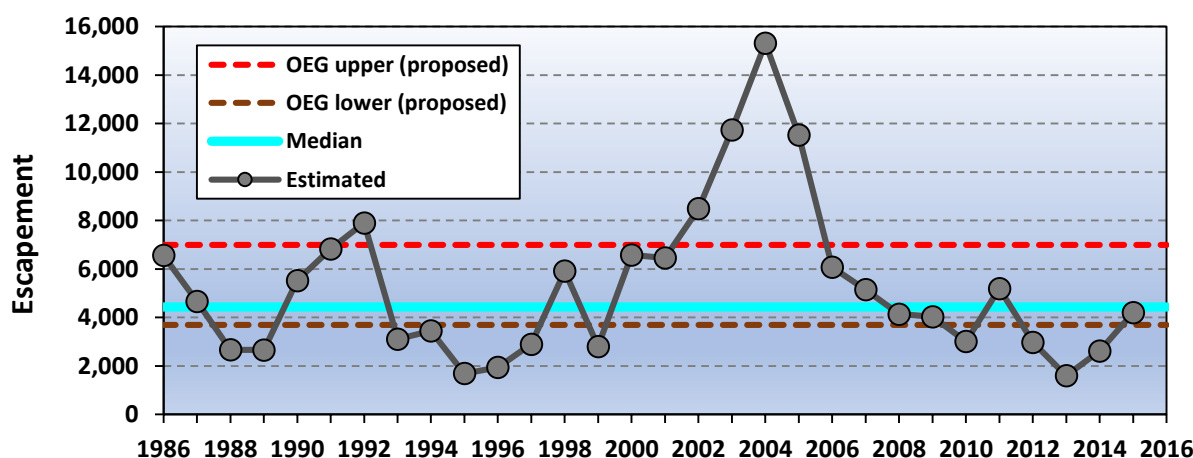


Figure 7. Historical escapements of large (≥ 75 cm MEF) early-run Kenai king salmon relative to the OEG proposed by KRSA.



Issue #2 – Inconsistencies in the Current Plan

Management plan provisions are contrary to plan goals and have produced undesirable unintended consequences.

- ❑ The size slot limit is directly contrary to explicit direction in the plan to manage harvest to closely approximate the size and age composition of the run.
- ❑ The size slot has failed to eliminate fishery selectivity. Harvest has simply been reconcentrated on the largest fish allowed under the slot. Smaller fish continue to be substantially under-harvested relative to abundance.
- ❑ The slot limit has failed to increase relative abundance of large fish. Subsequent analysis by ADF&G has identified declines in average age and size in king stocks across Alaska (Lewis et al. 2015). This implicates ocean conditions rather than fishing as the cause.
- ❑ The protected size slot results in escapements that frequently exceed the optimal escapement goal at large run sizes.
- ❑ The proposed large fish escapement goal provides explicit protection for large fish which was the original purpose of the slot limit.

KRSA Proposal (#149) – Revamp Kenai early-run King Management Plan

Revise the management plan [5 AAC 57.160] to achieve to following goals.

1. Manage for escapements comparable to the historical average and range.
2. Manage conservatively at low run sizes to optimize future returns.
3. Provide fishery opportunity based on abundance.

Establish a “step-up” regulatory strategy that replaces the slot limit with an effective but precautionary alternative:

- A. Limit harvest to fish under 30 inches at run sizes which produce escapements within the OEG in order to optimize fishery opportunity while also providing some harvest opportunity on small fish sizes that have been historically underexploited.
- B. Liberalize fishing opportunity at run sizes which produce escapements exceeding the OEG while also encouraging increased harvest of small fish sizes to balance potential angler preferences for larger fish.
- C. Repeal the “over 55 inches” provision and the sealing requirements that help implement this provision.



Myth: Inriver habitat issues warrant significant reduction in or reconfiguration of Kenai sport fisheries.

Fact: Freshwater productivity of Kenai kings is robust and virtually unaffected by inriver activities.

Critics of development and sport, guided sport and personal use fisheries often argue that inriver allocations must be reduced in order to avoid significant habitat or biological damage that results from sport and personal use fishery activities and related development. While we might identify mechanisms by which various concerns have the potential to impact fish, all available evidence indicates that net effects on Kenai salmon abundance and productivity of all current inriver concerns are so marginal as to not be measurable. Normal variation in salmon abundance and productivity is repeatedly misrepresented as a human effect.

Human activities inevitably create environmental concerns in areas where people concentrate. Concerns in the Kenai have included shoreline and watershed development, stream bank erosion, elevated turbidity from boat wakes, hydrocarbon pollution from boat motors, and urban runoff are all issues of concern in the Kenai. Biological effects of sport fishery selection for different sizes, sexes or subpopulations of Chinook have also been questioned.

We can all agree that wise stewardship of our tremendous salmon resources and habitat is an essential Alaskan value. It is also true that where risks are uncertain, precautionary actions are appropriate. Thus, each of these inriver concerns warrant fair consideration and appropriate remediation.

Thus, boat motor restrictions adopted by the Board have been instrumental in reducing hydrocarbon pollution in the Kenai. Many miles of spawning and riparian area have been closed to angling to protect stream banks and bank vegetation. Extensive infrastructure has been put in place to provide fish-friendly access to anglers on the Kenai River. Millions of dollars have been invested protection and restoration of riparian habitat along the Kenai River, both on private and public lands.

The Kenai is Alaska's ground zero for salmon allocation disputes between competing commercial and sport/personal use fisheries. Issues are further complicated by different perspectives among residents and non-residents, guided and unguided sectors, and set gillnetters operating in different areas.

Biological criticisms of the Kenai sport and personal use fisheries are inevitably colored by social issues associated with these fisheries. Social concerns include fishery crowding, a large influx of seasonal visitors, and competition among competing fishery interests. However, allocation and social issues require policy and social solutions. It is disingenuous to substitute biological justifications for political or social aims.

IX. KENAI COHO SPORT FISHERY

If there are enough coho salmon to support significant commercial harvest during August, then there are enough to restore the sport bag limit to three coho

Background

- ❑ For nearly 40 years, the daily bag and possession limit for coho salmon in the Kenai River was three fish, 16 inches or greater in length.
- ❑ In response to low coho abundance during the late 1990's, bag and possession limits were reduced to two fish as part of a comprehensive plan that included restrictions on commercial fisheries.
- ❑ Since that time, abundance has improved, yet the sport fishery still operates under the lowered bag and possession limit for the first part of the run during August.
- ❑ During the recent period of low king salmon abundance, coho became much more important to the recreational fishery during August than in the past.



Issue

Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.

If there are enough coho salmon to support significant commercial harvest during August of this sport priority species, then there are enough to restore the bag limit to three coho. If there aren't enough coho to restore the 3-fish bag limit, then there aren't enough to justify expansion of the commercial fishery during August.

Increasing the bag and possession limit from 2 to 3 fish in August would not jeopardize the sustained yield for the resource, would provide increased opportunity for harvest and would produce additional economic value for the fishery.

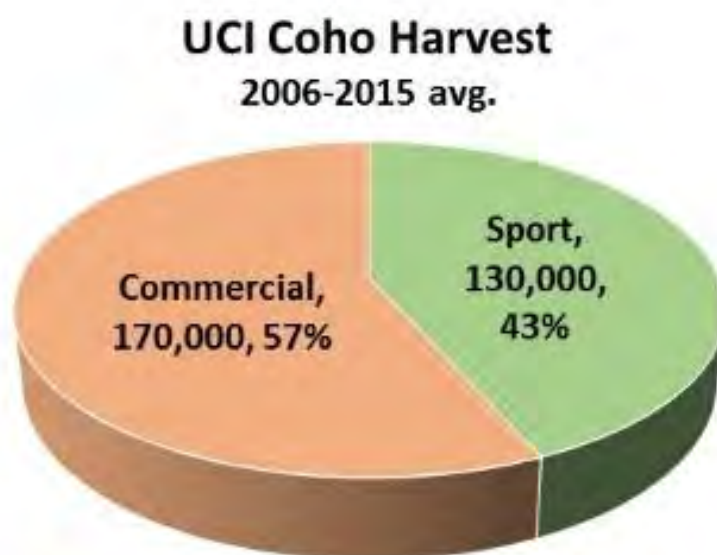


Figure 8. Recent average harvests and harvest shares of Upper Cook Inlet coho salmon.

KRSA Proposal (#191) –Kenai Coho Salmon Bag Limits

Increase coho daily bag and possession limit in the Kenai River from two fish to three fish beginning on the day after the closure of the set net fishery in the Upper Subdistrict.

Corresponding regulatory changes in 5 AAC 57.160 are:

- (C) from July 1 through **the day upon which the set net fishery in the Upper Subdistrict is closed for the season** [AUGUST 31], the daily bag and possession limit for coho salmon 16 inches or greater in length is two fish;
- (D) from **the day after the set net fishery in the Upper Subdistrict is closed for the season** [SEPTEMBER 1] through November 30, the daily bag and possession limit for coho salmon 16 inches or greater in length is three fish;

X. PERSONAL USE FISHERIES

The UCI personal use fishery is the largest resident only fishery in Alaska, and puts more fish in more freezers of Alaskans than any other state fishery

Background

- ❑ Personal use fisheries have a long and dynamic history in UCI but current fisheries were generally established in 1996. Since then popularity and participation have steadily increased.
- ❑ As many or more than 30,000 household permits are now fished annually with a peak effort of 43,799 household-days in 2013.
- ❑ Harvest has averaged 97% sockeye with small numbers of other salmon species. Combined harvest of sockeye reached a record 630,400 in 2011.
- ❑ Harvest opportunity in the Kenai and Kasilof personal use fisheries depends on high and somewhat predictable fish counts. Kenai sockeye counts of about 50,000 are needed before catch rates are adequate to make fishing worthwhile.
- ❑ Because most of the Kenai and Kasilof participants are not local, participants typically require some lead time and planning to make the trip. Limited and unpredictable escapement patterns associated with emergency openings of the ESSN fishery can throw the personal use participation off balance and reduce effort, harvest, and allocation.

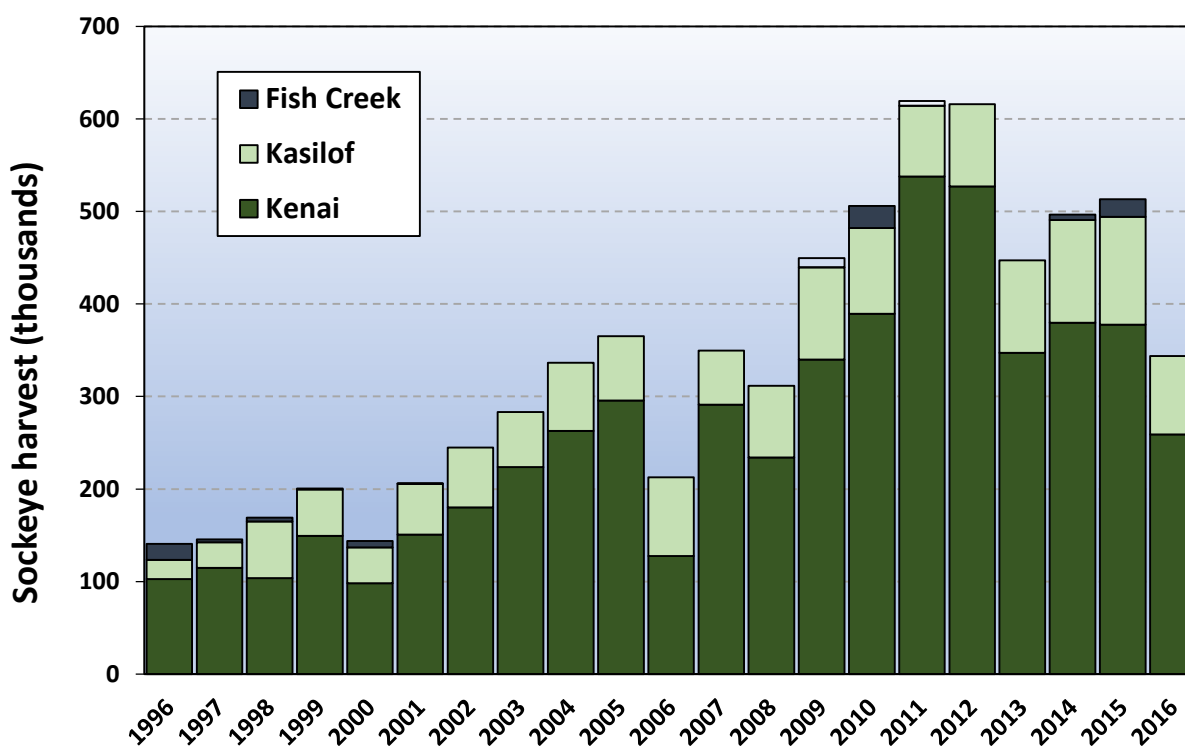


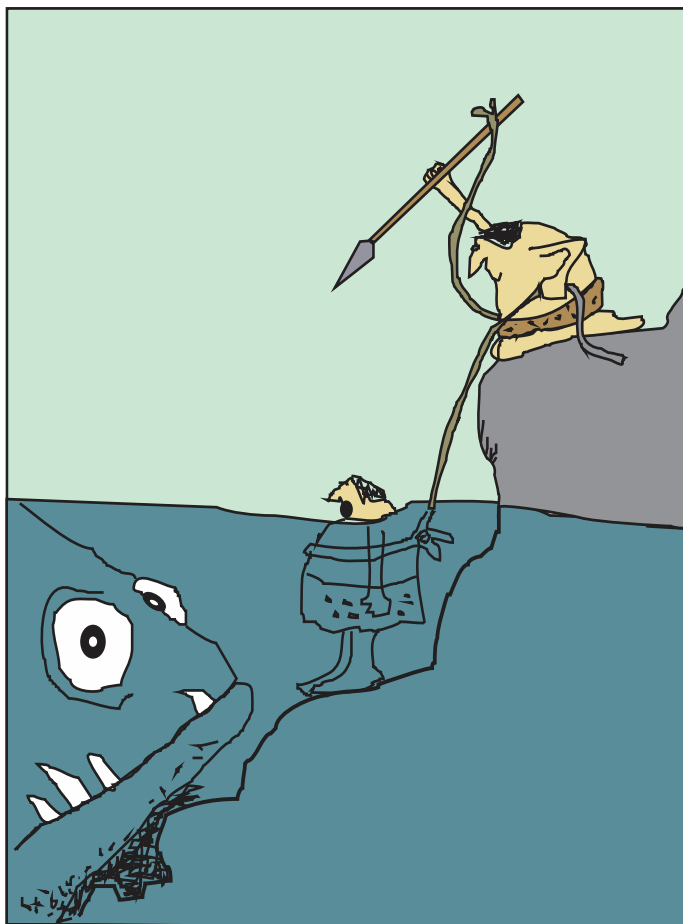
Figure 9. Personal use fishery harvest of sockeye.

Issue

Tremendous growth in the UCI personal use fisheries over the last two decades attests to the high value placed by Alaskans on the opportunity to harvest salmon for their tables in a family outdoor activity.

The popularity of the personal use fishery has led to growing pains while access and infrastructure to the limited fishing area have struggled to catch up. However, the economic value and activity generated by the fishery easily justify and support significant investments in the facilities and systems needed for effective opportunity, regulation and management.

Personal use fishing in the Kenai River from boats currently occurs from Kenai City Dock up to the Warren Ames Bridge at RM 5, and includes boat/motor restrictions starting at the Kenai River Special Management Area boundary at RM 4. Limited periods when sockeye are available and the small fishing area results produces a fishery that is crowded at times.



Now Grog, Now!

KRSA Proposal (#204) –Kenai Personal Use Boat Fishery Boundary Extension

Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park.

Explanation

This extension would provide additional area for boats to fish and reduce congestion in the area downstream of the Warren Ames Bridge. This proposed area is within the Kenai River Special Management Area, where boat motors while fishing are restricted to 50 horsepower or less. Currently, little sport fishing occurs below Cunningham Park without bait with current low participation. The king sport fishery in this area is only viable in years when water conditions are just right. Thus, there would be little user conflict between the Warren Ames Bridge and the proposed extension up to Cunningham Park.



XI. KRSA POSITIONS

Group 1 - Kenai Late-run Sockeye Management Plan & Set Gillnet Fishery

Kenai River Late-Run Sockeye Management Plan

116 [ADF&G] Review the optimal escapement goal (OEG) and inriver goals for Kenai River late-run sockeye salmon. There is broad support for a review of both the escapement and inriver goals for Kenai River Late-Run sockeye. The Plan calls for obtaining escapements throughout the Optimum Escapement Goal range but the upper bounds of the inriver goals, which are the management objectives for ADF&G commercial fisheries managers, are TOO LOW to provide for escapements within the upper half of the OEG range once the harvest in the sport fishery upstream of the sonar is accounted for. **SUPPORT RAISING THE INRIVER GOALS SUBSTANTIALY.**

117 [UCIDA, Melenchek] Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to remove the optimal escapement goal for Kenai River late-run sockeye salmon. **OPPOSE**

Kenai Late-Run sockeye are the primary target of the commercial fisheries in the Central District of Upper Cook Inlet. On years when the total run to Kenai is larger than average (4.6 plus million fish) to achieve the escapement objective of one million the run must be exploited at a rate of roughly 80%. No other stock or species sockeye, coho or king salmon present in Upper Cook Inlet at the same time can sustain an exploitation rate of the magnitude. The OEG for Kenai was designed to allow for additional escapement in the Kenai on years of large runs. When adopted in 1999 the estimated additional number of fish was 200,000 which was then added to the upper bound of the Sustainable Escapement Goal (SEG) of 700,000-1,200,000 to form an OEG of 700,000-1,400,000.

118 [Central Peninsula AC] Remove the optimal escapement goal for Kenai River late-run sockeye salmon and add the guided sport fishery to the list of fisheries managed under the plan. **OPPOSE**

119 [M. Drucker & Beaudoin] Amend management plan to achieve inriver goal range of 850,000–1,050,000 late-run sockeye salmon at run strengths less than 2.3 million sockeye salmon and 950,000– 1,150,000 late-run sockeye salmon at run strengths greater than 2.3 million sockeye salmon. **OPPOSE**

120 [S. Drucker] Decrease the inriver goal ranges for late-run Kenai River sockeye salmon by 100,000 fish and limit the bag and possession of sockeye salmon to three per day and three in possession in the Kenai River sport fishery. **OPPOSE**

121 [Garcia] Repeal and readopt management plan to remove the optimal escapement goal, mandatory restrictions and closed fishing periods or “windows”, and specify that management will be based on the abundance of late-run Kenai River sockeye salmon. **OPPOSE**



- 122 [McCombs] Remove mandatory closed fishing periods or "windows" from the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**

Upper Subdistrict Set Gillnet Fishery

- 134 [Central Peninsula AC] Remove restrictions in the Upper Subdistrict commercial set gillnet fishery and allow for regular weekly fishing periods through July 20 with additional fishing periods based on inseason abundance. **OPPOSE**
- 135 [Person] Redefine sections and manage the commercial set gillnet fishery in the Upper Subdistrict with three sections with staggered opening dates. **OPPOSE**
- 137 [Central Peninsula AC] Remove "one-percent rule", where the commercial set gillnet fishery will close after July 31, if less than one percent of the season's total sockeye is harvested in two consecutive fishing periods. **OPPOSE**
- 138 [KPFA] Remove the one-percent rule that applies to the commercial set gillnet fishery in the Upper Subdistrict after July 31 so that the set gillnet fishery will close August 15 and be managed using regular fishing periods from August 11 through August 15. **OPPOSE**
- 139 [Drucker] Repeal the one-percent rule, as it applies to the Upper Subdistrict set gillnet fishery so that the set gillnet fishery will close August 15. **OPPOSE**
- 136 [Hollier] Allow commercial fishing with set gillnets in the North Kalifonsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8. **OPPOSE**
- 140 [Hollier] Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth. **OPPOSE**
- 141 [KRSA] Limit the depth of all set gillnet gear in Upper Subdistrict of the Central District to no more than 29 meshes deep. **SUPPORT**

Group 2 - Kenai River Late-Run King Salmon Management Plan

- 162 [KRSA] Establish an optimal escapement goal for Kenai River late-run king salmon. KRSA proposal to increase upper bound of goal range - **SUPPORT**
- 163 [KPFA] Prohibit bait on runs less than 22,000 and eliminate 12-hour fishing period restriction. **OPPOSE**
- 160 [KAFC] Prohibit use of bait in the late-run Kenai River king salmon fishery until escapement goals have been met. **OPPOSE**
- 161 [Brush] Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention. This already happens at low levels of abundance as part of the Plan. **OPPOSE**



- 173 [Beaudoin] Decrease the projected inriver run goal of late-run king salmon to 19,000 fish and remove the Upper Subdistrict commercial set gillnet fishery from “paired” restrictions. **OPPOSE**
- 168 [Doner] Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery in July and August. **OPPOSE**
- 169 [Shadura] Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery in July and August. **OPPOSE**
- 172 [McCombs] Remove “paired” restrictions in the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**
- 167 [Vanek] Close the Kenai River personal use fishery when the late run king salmon sport fishery is closed. **OPPOSE**
- 174 [Beaudoin] Remove provisions (e)(3)(A) (i) and (ii) that restrict the number and/or depth of commercial set gillnets fished by a Commercial Fisheries Entry Commission limited entry permit holder in the Upper Subdistrict if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**
- 175 [Person] Clarify (the author wants to use four nets, not the three described in regulation) the length and depth of set gillnets that may be used in the Upper Subdistrict commercial salmon fishery, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**
- 171 [Goodman] Remove the commercial set gillnet fishery in the Kasilof Section from “paired” restrictions in the *Kenai River Late-Run King Salmon Management Plan*. **OPPOSE**
- 176 [Shadura] Allow commercial set gillnet fishing periods in the Kenai and Kasilof sections to be managed separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**
- 177 [Anchorage AC] Allow commercial fishing periods in the Kasilof and Kenai/East Forelands sections to be opened separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**
- 165 [Hollier] Decrease the trigger for management actions on Kenai River late-run king salmon AFTER AUGUST 1 from 22,500 to 16,500. **OPPOSE**
- 166 [KAFC] Modify season dates and area for Kenai River late-run king salmon management. The author seeks to reduce both time and area open to sport fishing for king salmon in the Kenai River substantially. **OPPOSE**
- 164 [Ducker] Repeal and readopt the *Kenai River Late-Run King Salmon Management Plan*. **OPPOSE**



- 170 [Ware] Reconsider “paired” restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**

Group 3 - Kasilof River Salmon Management Plan

- 106 [Young] Replace the optimal escapement goal with the sustainable escapement goal for Kasilof River sockeye salmon. **OPPOSE**
- 107 [Central Peninsula AC] Replace the optimal escapement goal with a sustainable escapement goal for Kasilof River sockeye salmon. **OPPOSE**
- 108 [Beaudoin] Replace the optimal escapement goal with the current biological escapement goal for Kasilof River sockeye salmon. **OPPOSE**
- 99 [Blossum] Amend management plan to remove all restrictions and manage the commercial set gillnet fishery to harvest surplus Kasilof River sockeye salmon. **OPPOSE**
- 100 [Beaudoin] Open the commercial set gillnet fishery in the Kasilof Section as early as June 20 if the department estimates 50,000 sockeye salmon will be in the Kasilof River before June 25. **OPPOSE**
- 101 [Shadura] Allow commercial fishing with set gillnets within 600 feet of shore in the Kasilof Section, with fishing time occurring 600 feet or less offshore not subject to the hourly restrictions in the *Kenai River Late-Run Sockeye Salmon Management Plan*. **OPPOSE**
- 102 [Ducker] Amend management plan to allow commercial fishing with set gillnet gear in the Kasilof Section within one-half mile of shore and eliminate the provision allowing commercial fishing with set gillnet gear only within 600 feet of shore in the Kasilof Section. **OPPOSE**
- 103 [KRSA] Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 and adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7. **SUPPORT**
- 104 [Ducker] Reduce the closed fishing period or “window” and increase additional fishing time with set gillnet gear in the Kasilof Section. **OPPOSE**
- 105 [Every] Allow commercial fishing with set gillnet gear in the North Kalifonsky Beach statistical area (NKB - stat area 244-32) when the upper end of the Kasilof sockeye salmon escapement goal range is projected to be exceeded. **OPPOSE**
- 109 [ADF&G] Provide clarification on the use of gear in the Kasilof River Special Harvest Area (KRSHA) for individuals who hold two Cook Inlet set gillnet Commercial Fisheries Entry Commission (CFEC) limited entry permits. **KRSA has taken no position on**



proposals addressing the conduct of commercial fisheries within the Special Harvest Area.

- 110 [Person] Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one gillnet per limited entry permit held. **NO POSITION**
- 111 [Shadura] Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one set gillnet per limited entry permit held. **NO POSITION**
- 112 [Hollier] Allow holders of two Commercial Fisheries Entry Commission set gillnet limited entry permits to fish two set gillnets in the Kasilof River Special Harvest Area. **NO POSITION**
- 113 [Central Peninsula AC] Remove restrictions on the amount of drift or set gillnet gear a vessel may have on board within the Kasilof River Special Harvest Area. **NO POSITION**
- 114 [Person] Require all nets, buoys, ropes and anchoring devices to be removed from the Kasilof River Special Harvest Area when this area is closed to commercial fishing. **NO POSITION**
- 115 [ADF&G] Define the boundary that separates set gillnet from drift gillnet gear in the Kasilof River Special Harvest Area (KRSA), and define the outside boundaries of the KRSA. **SUPPORT**

Group 4 - Central District Drift Gillnet Fishery Management Plan

- 85 [Garcia] Repeal and readopt provisions (a)–(f) of the management plan and add provisions to manage the drift gillnet fishery to harvest surplus sockeye, pink, and chum salmon production and achieve escapement goals. **OPPOSE**
- 86 [Central Peninsula AC] Amend provisions (a)–(f) of the management plan and add language to manage the commercial drift gillnet fishery based on the inseason abundance to meet escapement goals and harvest surplus salmon. **OPPOSE**
- 89 [UCIDA] Repeal and readopt *Central District Drift Gillnet Fishery Management Plan* with the amended plan removing mandatory time and area restrictions from July 1–August 15. **OPPOSE**
- 87 [Hillstrand] Amend *Central District Drift Gillnet Fishery Management Plan* to maximize commercial harvest of sockeye salmon. **OPPOSE**
- 88 [McCombs] Remove restrictions to the commercial drift gillnet fishery, so that the fishery would occur during two inlet-wide fishing periods based on test fishery and escapement data. **OPPOSE**



- 90 [UCIDA] Remove restrictions on the commercial drift gillnet fishery from July 1–31 and manage the drift gillnet fishery based on inseason salmon abundance. **OPPOSE**
- 91 [Central Peninsula AC] Remove area restrictions imposed on the commercial drift gillnet fishery during July 9– 15 and 16–31 time periods. **OPPOSE**
- 92 [Mat-Su Valley AC] Restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15. **SUPPORT**
- 93 [AOC] Amend preamble of management plan and restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15. **SUPPORT**
- 95 [ASFA] Restrict commercial drift gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1–15. **SUPPORT**
- 94 [Central Peninsula AC, UCIDA] Remove the one-percent rule, as referenced to both the set and drift gillnet fisheries, from the drift gillnet management plan. **OPPOSE**
- 97 [McCombs] Repeal the drift and set gillnet one-percent rules that apply from August 1–15. **OPPOSE**
- 96 [Hillstrand] Allow commercial fishing with drift gillnets in all waters of the Central District, except the Kenai and Kasilof Sections, from August 16 until closed by emergency order. **OPPOSE**
- 98 [Glassmaker] Reduce sport fishery bag limit for coho salmon on the west side of Cook Inlet and close drift gillnet fishing in Areas 3 and 4 for remainder of season if coho salmon sport fishing is restricted or closed in the Little Susitna River. **SUPPORT CONCEPT**

Group A - Cook Inlet Areawide & Northern Cook Inlet Sport Fisheries

Cook Inlet Areawide Sport Fisheries (5 Proposals)

- 14 [Housh] Allow snagging for sockeye salmon in all Cook Inlet freshwater lakes (*This proposal will be considered at the UCI and LCI meetings*). **OPPOSE**
- 34 [Housh] Allow party fishing in Cook Inlet fresh and salt water for all species except king salmon (*This proposal will be considered at the UCI and LCI meetings*). **OPPOSE**
- 144 [Anchorage AC] Require that when proxy fishing in Upper Cook Inlet, once a bag limit is taken the next legal bag limit caught must be retained. **OPPOSE**
- 145 [McCormick] Allow only barbless hooks in Upper Cook Inlet flowing waters closed to salmon fishing. **OPPOSE**
- 146 [Central Peninsula AC] Require the use of circle hooks when fishing for sockeye salmon. **OPPOSE**



Knik River, Anchorage Area (13 Proposals)

- 233 [ADF&G] Extend the area closed to sport fishing downstream of the Little Susitna weir.
SUPPORT
- 225 [Young] Reduce the bag limits for salmon, other than king salmon, and prohibit releasing coho salmon. **OPPOSE**
- 232 [ADF&G] Modify the Fish Creek personal use fishery to accommodate a new Sustainable Escapement Goal (SEG) range. **QUESTIONS REMAIN NO POSITION**
- 228 [Busch] Increase the hours open to fishing in Fish Creek. **SUPPORT**
- 235 [Stier] Increase the hours open to fishing on Cottonwood Creek. **SUPPORT**
- 236 [Warta] Increase the hours open to fishing in the Wasilla Creek / Rabbit Slough drainage.
SUPPORT
- 234 [ADF&G] Open waters in a closed area on Wasilla Creek within 300 feet of Palmer Fishhook Road to sport fishing. **SUPPORT**
- 224 [Couch] Restrict hours and dates open to fishing on Jim Creek. **SUPPORT**
- 237 [ADF&G] Amend the regulations for the Anchorage Bowl Drainages to allow harvest of salmon, other than king salmon, that are less than 16 inches in length.
- 238 [ADF&G] Add Lower Sixmile Lake to the list of stocked lakes.
- 240 [ADF&G] Close all fishing on a portion of Campbell Creek when that portion is not open to coho salmon fishing.
- 239 [Slinker] Create a youth-only fishery on Ship Creek.
- 241 [ADF&G] Extend the area closed to sport fishing on Ship Creek.

Group B - Fishing Districts, etc.

Fishing Districts & Gillnet Specifications & Operations (4 Proposal)

- 84 [ADF&G] Clarify closed waters around the Kenai and Kasilof Rivers. **SUPPORT**
- 131 [Shadura] Define commercial fishing statistical areas in the Upper Subdistrict set gillnet fishery. **KRSA SUPPORTS ADF&G Position**
- 132 [UCIDA] Move the southwestern-most point of the Expanded Kasilof Section 1.2 nm west so it aligns with the northwestern-most point of the Expanded Anchor Point Section.
OPPOSE
- 133 [Merchant] Allow a single person holding two Commercial Fisheries Entry Commission Cook Inlet drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear.
OPPOSE



Pink Salmon Management Plan (4 Proposals)

It is not possible to increase commercial harvest of pink salmon without increasing the commercial harvest of coho salmon. Coho salmon are vitally important to the sport fisheries. Pink salmon are of low value most years and have never comprised more than 1% of the total ex-vessel value of salmon in the commercial fishery.

- 123 [Central Peninsula AC] Repeal and readopt the management plan to allow for the commercial harvest of surplus pink salmon in the Upper Subdistrict with set and drift gillnet gear. **OPPOSE**
- 124 [Hollier] Amend the *Cook Inlet Pink Salmon Management Plan* to remove or lower the daily harvest triggers. **OPPOSE**
- 125 [KPFA] Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery. **OPPOSE**
- 126 [Beaudoin] Increase maximum mesh size for set gillnets to 5-inches and expand the fishing season to August 6–15 in the commercial pink salmon fishery. **OPPOSE**

Upper Cook Inlet Management Plan (4 Proposals)

- 127 [KRSA] Remove inriver goals from the list of escapement goals in the *Upper Cook Inlet Salmon Management Plan* and realign inriver and escapement goals in the *Kenai River Late-Run Sockeye Salmon Management Plan*. **SUPPORT**

The important factor in this proposal is that subsection (e) of this Plan directs the ADF&G to manage for escapement goals even if it means that the management can go outside of restrictions adopted in established plans. Inriver goals are considered an escapement goal for the purpose of this Plan, they are not! The only inriver goals in UCI are for late-run Kenai River sockeye and the inriver goals are too low making it almost impossible for managers to stay within the target. Managers then ignore provisions of the Drift Plan that create the Conservation Corridor, the hour limits on the ESSN and the 1% rules. Inriver goals must be removed from list.
- 128 [Central Peninsula AC] Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **OPPOSE**
- 129 [UCIDA] Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **OPPOSE**
- 130 [Hillstrand] Amend *Upper Cook Inlet Salmon Management Plan* so that fishery restrictions on fully allocated stocks of concern are shared among all user groups in proportion to the respective user group harvest of that stock. **OPPOSE**



West Cook Inlet Salmon (1 Proposal)

- 142 [Glassmaker] Close waters within one statute mile of the terminus of Kustatan, Drift, and Big rivers, and Bachatna Creek; as measured from mean lower low water, to commercial fishing. **SUPPORT CONCEPT, CASE BY CASE EXAMINATION**

Cook Inlet Smelt (1 Proposal)

- 143 [Vanek] Increase the amount of smelt that may be taken in the Cook Inlet commercial smelt fishery from 100 tons to 200 tons annually. **ADDITIONAL INFORMATION IS NEEDED**

Group 5 – Kenai/ Kasilof King Sport Fisheries, Vessel/Habitat Restrictions & Guides

Kenai River King Salmon (13 Proposals)

- 149 [KRSA] Revise *Kenai River and Kasilof River Early-run King Salmon Management Plan*. KRSA proposal **SUPPORT**
- 148 [Blossum] Rewrite the *Kenai River and Kasilof River Early-run King Salmon Management Plan* to redefine early-run stocks and establish age- and sex-based escapement goals. **OPPOSE**
- 147 [Brush] Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery. **OPPOSE**
- 150 [Wackler] Start the Kenai River king salmon sport fisheries as single-hook, no bait, non-retention. **OPPOSE**
- 153 [KAFC] Prohibit fishing for king salmon from markers 300 yards below Slikok Creek upstream to Skilak Lake. **OPPOSE**
- 154 [Pearson] Expand the waters of the Kenai River closed to fishing for king salmon. **OPPOSE**
- 155 [USFWS] Expand the waters of the Kenai River closed to fishing for king salmon. **OPPOSE**
- 156 [KAFC] Replace slot limit for Kenai River king salmon with maximum size limit to prohibit retention of king salmon greater than 42 inches in length. **OPPOSE**
- 159 [USFWS] Extend the time that the slot limit for Kenai River king salmon is in effect. **OPPOSE**
- 157 [KAFC] Modify the annual limit of king salmon from the Kenai River to two fish, only one taken prior to July 1. **OPPOSE**
- 158 [Brush] Modify the annual limit of two king salmon for the Kenai River to include only one large fish. **OPPOSE**
- 151 [Brush] Repeal barbless hook provisions in Lower Kenai River. **OPPOSE**
- 152 [KRPGA] Expand the dates to prohibit back trolling and tie to prohibition of bait. **OPPOSE**



Kenai River Vessels and Habitat Restrictions (4 Proposals)

- 178 [Corr] Increase the number of days only non-motorized vessels may fish on the lower Kenai River. **OPPOSE**
- 179 [KAFC] Add Thursdays as a day only non-motorized vessels may fish on the Kenai River downstream of Skilak Lake. **OPPOSE**
- 180 [ADF&G] Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15. **SUPPORT**
- 181 [McCombs] Only non-motorized vessels may be used when fishing on the Kenai River. **OPPOSE**

Guides Kenai and Kasilof Rivers (4 Proposals)

- 182 [Wellman] Prohibit all guiding from 6 p.m. to 6 a.m. **OPPOSE**
- 183 [Erickson] Allow guided anglers to fish on Mondays in August. **OPPOSE**
- 185 [Wilson] Modify language referencing fishing from guide boats on the Kenai River to include all guided fishing. **OPPOSE**
- 184 [Erickson] Relax guiding restrictions when king salmon fishing is closed by emergency order. **OPPOSE**

Group 6 - Kenai, Kasilof, Russian River Sport & Personal Use

Kenai, Kasilof & Russian River Sport (9 proposals)

- 186 [McCormick] Only barbless hooks allowed in Kenai River upstream of the Lower Killey River. **OPPOSE**
- 187 [Corr] Allow only barbless, unbaited, single-hook gear on the Kenai River from January 1 – August 1. **OPPOSE**
- 188 [KAFC] Allow only one single-hook or one single-hook lure. **OPPOSE**
- 189 [Erickson] Allow fishing from shore after harvesting a bag limit of coho salmon. **OPPOSE**
- 190 [KRPGA] Expand the waters open to fishing after harvesting a bag limit of coho salmon in the lower Kenai River. **OPPOSE**
- 191 [KRSA] Increase Kenai River coho salmon bag limit from two fish to three the day after the ESSN commercial fishery closes. **SUPPORT**
- 192 [KRPGA] Shorten the Kenai River coho season by closing October 31. **NEUTRAL**
- 193 [Robbins] Create an archery fishery for sockeye salmon in a section of the Russian River. **OPPOSE**
- 194 [Lee] Create a size limit for lake trout on Hidden Lake. **DEFERRED TO ADF&G**



Kenai River Personal Use (13 Proposals)

- 195 [Koch – City of Kenai] Remove the commissioner's emergency order authority to extend the Kenai River personal use fishery hours. **OPPOSE**
- 196 [Vanek] Prohibit dip nets from being attached to a vessel. **OPPOSE**
- 197 [Vanek] Prohibit dipnetting from a vessel that is not anchored in the Kenai and Kasilof river personal use fisheries. **OPPOSE**
- 198 [Vanek] Prohibit webbing in personal use dip nets that exceeds 2.5 inch stretched measure. **OPPOSE**
- 199 [Kenai/Soldotna AC] Prohibit dipnetting on the Kasilof River from a vessel with a motor on board greater than 10 horsepower. **OPPOSE**
- 200 [Shadura] Amend the number of king salmon that may be retained in the Upper Cook Inlet personal use fishery to 10 king salmon under 20 inches. **OPPOSE**
- 201 [ADF&G] Amend the area open to dipnetting from shore in the Kenai River personal use dip net fishery. **OPPOSE**
- 202 [Jordan] Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August. **OPPOSE**
- 203 [AOC] Extend the season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon. **OPPOSE**
- 204 [KRSA] Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park. **KRSA PROPOSAL SUPPORT**
- 205 [SCADA] Allow shore based personal use dipnetting in the Kenai River upstream to Skilak Lake when the ADF&G increases the bag limit in the sport fishery from 3 to 6 fish. **SUPPORT**
- 206 [Madison] Create an area upstream of the Kenai River personal use fishery where recording and fin clip requirements are waived for fish that have not been off loaded. **OPPOSE**
- 207 [ADF&G] Amend the boundary description language for the area open to dipnetting in the Kasilof River personal use salmon fishery. **SUPPORT**

Cook Inlet Personal Use (1 Proposal)

- 208 [Madison] Allow 10 Dolly Varden/Arctic char per household in Cook Inlet Personal Use Fisheries. **OPPOSE**



Group 7 - Northern District Commercial & Susitna River Sport Fisheries

Northern District Commercial Salmon (10 proposals)

- 209 [Mat-Su Valley AC] Repeal the *Northern District King Salmon Management Plan*. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**
- 211 [Allen] Close the Northern District commercial set gillnet fishery until the first regular period after June 24, if the Susitna River sport fishery is restricted by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**
- 210 [Young] Repeal and readopt management plan to fully utilize surplus salmon stocks based on the abundance of salmon returning to the Northern District. **OPPOSE**
- 212 [AOC] Close the commercial set gillnet fishery in the Northern District on August 15. **SUPPORT**
- 213 [Mat-Su Borough FWC] Close commercial fishing within one mile of Little Susitna River when the Little Susitna River sport fishery is restricted to no bait. **SUPPORT**
- 214 [Mat-Su Borough FWC] Close commercial fishing within one mile of the Little Susitna River when more than half of Northern District streams with king salmon escapement goals are closed to sport harvest of king salmon or when the Little Susitna River sport fishery is restricted by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**
- 215 [Allen] Close commercial fishing within one mile of the Little Susitna River, if the Little Susitna River king salmon sport fishery is restricted to harvest less than 7 days per week and artificial lures by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**
- 216 [Mat-Su Valley AC, ASFA] Close waters within one-statute mile of the Little Susitna River to commercial fishing. **SUPPORT**
- 217 [Rollman] Remove the Eastern Subdistrict of the Northern District from commercial set gillnet restrictions that apply July 20–August 6. **OPPOSE**
- 218 [NDSNCI] Allow a holder of more than one Commercial Fisheries Entry Commission set gillnet limited entry permit to fish with one set gillnet per permit held in the Northern District. **OPPOSE**

Susitna River Sport Fisheries (10 proposals)

- 230 [Mat-Su Borough FWC] Create a Deshka River King Salmon Management Plan. **SUPPORT CONCEPT**
- 231 [Counch] Create a Susitna River King Salmon Management Plan. **SUPPORT CONCEPT**
- 219 [Mathis/Montana Creek Campground] Allow an unbaited, single-hook, artificial lure, no retention fishery on resident species when waters of Montana Creek are closed to fishing for king salmon. **SUPPORT**



- 221 [McCormick] Prohibit harvest of king salmon in units 2, 3, 5 and 6, except Willow Creek.
- 223 [Warta] Prohibit king salmon fishing in Unit 2 if no retention is allowed.
- 220 [Mat-Su Borough FWC] Establish sport fishery closure times in the Larsen Creek drainage.
SUPPORT
- 222 [Central Peninsula AC] Prohibit fishing for king, sockeye, and coho salmon in the Larson Creek drainage. **OPPOSE**
- 226 [B. Allen] Create a bag limit of one hatchery king salmon in the Susitna River drainage.
- 227 [A. Allen] Allow harvest of hatchery king salmon when emergency orders restrict the sport fishery.
- 229 [Hallsten, Wallace, Grogan, Gibbs] Reduce the maximum legal size for rainbow trout in Byers Creek from 20 to 16 inches. **OPPOSE**

Group 8 – Regulatory Alignment Sport Fishing

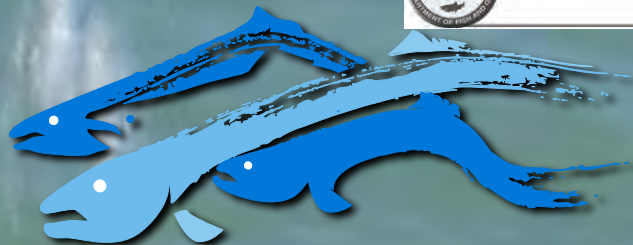
- 71 [ADF&G] Align size restrictions for Dolly Varden and rainbow trout bag limit in the flowing waters of the Kenai River Drainage Area.
- 72 [ADF&G] Amend general provisions for lakes and ponds of the Kenai River drainage to restore winter ice fisheries for landlocked coho salmon less than 16 inches in length.
- 73 [ADF&G] Align the Swanson River rainbow trout spawning closure with the proposed Kenai River drainage rainbow trout spawning closure start date.
- 74 [ADF&G] Align the Kenai River king salmon sanctuaries start date, and boat closures with the proposed rainbow trout spawning closure start date.
- 75 [Buntjer] Align dates anglers are prohibited from fishing from boats with rainbow trout closure.
- 76 [ADF&G] Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar closure periods.
- 77 [ADF&G] Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar fishing seasons, such that anglers are prohibited from fishing for salmon.
- 78 [ADF&G] Align the closure start date for all the tributaries of the Upper Section of the Kenai River Drainage Area with the start dates proposed for the king salmon sanctuaries and the start dates proposed for the rainbow trout spawning closure. In addition, create the same fishing season in all the tributaries of the Upper Section of the Kenai River Drainage area.



- 79 [ADF&G] Change the Kenai River king salmon sanctuaries and the Moose-Kenai rivers confluence area fly-fishing-only waters to artificial fly waters, and align dates for these special provisions with other provisions.
- 80 [ADF&G] Align gear restrictions for Kenai River tributaries.
- 81 [ADF&G] Create consistent rainbow/steelhead trout regulations in the Kasilof River above and below the Sterling Highway Bridge and amend the open season date for Tustumena Lake tributaries to protect spawning rainbow/steelhead trout.
- 82 [ADF&G] Amend Kasilof River early-run king salmon possession requirements.
- 83 [ADF&G] Repeal gear regulations for northern pike.

XII. REFERENCES

- Bethe, M. L., & P. Hansen. 1998. Investigations of methods and means to minimize Chinook salmon harvest in the East Side Set Net Fishery of Upper Cook Inlet, 1996. ADF&G Special Publication 98-3.
- Clark, R., M. Willette, S. Fleischman & D. Eggers. 2007. Biological and fishery-related aspects of overescapement in Alaskan sockeye salmon (*O. nerka*). ADF&G Special Publication 07-17.
- Fleischman, S. J., & A. M. Reimer. 2017. Spawner-recruit analyses and escapement goal recommendations for Kenai River Chinook Salmon. ADF&G Fishery Management Series 17-02.
- Eskelin, T., A. W. Barclay, & A. Antonovich. 2013. Mixed stock analysis and age, sex, length composition of Chinook salmon in the eastside set gillnet fishery in Upper Cook Inlet, Alaska, 2010-2013. ADF&G Fishery Data Series No. 13-22
- Eskelin, T., & A. W. Barclay. 2015. Mixed stock analysis and age, sex, and length composition of Chinook salmon in Upper Cook Inlet, Alaska, 2014. ADF&G Fishery Data Series No. 15-19, Anchorage.
- Eskelin, T., & A. W. Barclay. 2016. Mixed stock analysis and age, sex, length composition of Chinook salmon in the eastside set gillnet fishery in Upper Cook Inlet, Alaska, 2015. ADF&G Fishery Data Series 16-18
- Lewis B., W. S. Grant, R. E. Brenner, & T. Hamazaki. 2015. Changes in Size and Age of Chinook Salmon *Oncorhynchus tshawytscha* Returning to Alaska. PLoS ONE 10(6):e0130184. <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0130184>
- MSBFWC (Matanuska-Susitna Borough Fish and Wildlife Commission). 2017. Report to the Alaska Board of Fisheries.
- Shields, P., & A. Dupuis. 2017. Upper Cook Inlet commercial fisheries annual management report, 2016. ADF&G Fishery Management Report 17-05.
- Shedd, K. R., & five coauthors. 2016. Genetic stock composition of the commercial harvest of sockeye salmon in the Kodiak Management Area, 2014-2016. ADF&G Fishery Manuscript Series 16-10.
- SWHS (Statewide Harvest Survey). 2017. <http://www.adfg.alaska.gov/sf/sportfishingsurvey/>
- Welch, D.W., A. D. Porter, & P. Winchell. 2014. Migration behaviour of maturing sockeye (*Oncorhynchus nerka*) and Chinook salmon (*O. tshawytscha*) in Cook Inlet, Alaska, and implications for management. Animal Biotelemetry 2:25. doi:10.1186/s40317-014-0018-3. Available at: <http://www.animalbiotelemetry.com/content/pdf/s40317-014-0018-3.pdf>.
- Willette, T. M., & A. Dupuis. 2017. Temporal and spatial distributions of Kenai River and Susitna River sockeye salmon and coho Salmon in Upper Cook Inlet: Implications for management. ADF&G Fishery Data Series 17-02.



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To: Alaska Board of Fisheries

Thank you for this opportunity to comment on proposals.

Proposals 147 and 150: Oppose both. Given the poor runs of recent years, to "maximize opportunity" to catch Kenai River king salmon makes no sense whatsoever. Until such time that adequate spawning escapement can be assured, these fish should be left alone.

Proposal 151: Oppose Barbless hooks have been required in Washington state salmon fisheries for several years, and for good reason. In Washington as well as in Alaska, some salmon have to be released by law, and others are released by the angler's choice. Barbless hooks release more easily and more quickly than barbed hooks, which surely causes less stress to salmon that already may be stressed from other causes. An advantage to anglers and fish alike is that barbless hooks are easier to remove from a net.

Proposal 155: Support The 4.5 miles of the Kenai River immediately downstream from Skilak Lake is a known spawning area for king salmon. These fish aren't moving through, but are there to spawn. They should be left alone. Trout fishing in this area has greatly increased in recent years, causing a higher incidence of incidentally caught kings. This, along with the almost constant noise and disturbance by power-boats surely affects spawning success. There is plenty of fishing opportunity in this stretch of the river without king salmon fishing.

Proposal 159: Support This well-thought-out and researched proposal would extend the existing slot limit and no-bait restriction through July. It addresses several concerns and would benefit early-run king salmon.

Thank you for your consideration.

Les Palmer

Sterling, Alaska



Submitted By
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2/9/2017 7:43:34 AM
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My name is Mark Glassmaker and I have operated a sportfish guide business on the Kenai River since 1990. My company also offers day trips via floatplane to a number of remote fisheries on the West Side of Cook Inlet. I would like to speak today regarding a suit of proposals that address West Side Cook Inlet coho salmon stocks. Proposal 142, seeks to extend the area closed to commercial fishing near the mouths of the primary West Side Cook Inlet Coho producing streams. Currently the regulations measure stream mouth closure distances from mean high tide and this needs to be changed to mean low tide to better afford the protection intended by this closure. The area in question includes extensive tidal flats and rivers, especially at low tide, that extend well beyond the area where the shoreline vegetation meets the mud flats. They snake their way out to Cook Inlet and the closed waters around the mouths of these rivers should be measured from where they meet salt water at low tide, not merely where the river meets the tidal mud. Current regulations allow commercial vessels to set nets at high tide that essentially block off the entire streambed or channel throughout the intertidal portion of that stream inside of the low water mark.

I would also like to comment on proposal 98 which would reduce the sport fish limit from three to two fish and restrict the central district drift gillnet fishery to the expanded Kenai and Kasilof sections when the Little Susitna is restricted. I chose the Little Susitna as it is currently the most proximate West Cook Inlet river to Big River and the Kustatan and thus serves as the best available indicator of Northern District and West Cook Inlet coho run strength. Given the increased exploitation of these stocks over the last decade, it seems more than prudent to establish restrictions to both commercial and sport harvest in years of lower coho abundance. I would also like to state my support for proposal 95 which would restrict the commercial gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1-15.

Concerning Kenai River issues, I would like to state my support for starting the early run king salmon management with at least catch and release. This conservative approach provides predictability and marketability for the fishery. I would also tentatively support beginning the run with catch and keep, as this will have very little biological impact on runs of low abundance due to low angler participation and success rates. Advantages are increased harvest opportunity, marketability and creel survey data to identify age and condition of fish kept. In regards to first run in season management, I strongly support managing based on a "hurdle" system. A hurdle system would allow management decisions to be at the 25, 50 and 75 percent marks of the run. This would layout clear numbers of fish that the department would use to make management decisions. I strongly feel that the "hurdles" should be based on the mid-point of the escapement goal rather than the low end. Liberalization could occur on runs above the mid-point. The first liberalization tool should be removal of the slot limit. The second liberalization tool would be the use of bait, but only if the upper end of the escapement goal is projected to be exceeded.

For Second Run Season Management, I support status quo. I believe with the current management plan and paired restrictions, managers have the necessary tools to manage the run at all run strengths and particularly at low abundance: are able to restrict both the sport and commercial fisheries to ensure sustainability. I do not support any removal or liberalization of the current paired restrictions as I feel sharing the burden of conservation among all user groups is very important.

I do not support adding additional drift only days for the following reasons:

- Drift is currently available at any time.
- There is inadequate infrastructure, restrooms and parking to facilitate launch and retrieval.
- This would necessitate the purchase of a drift boat for those without this resource, thus creating a cost increase to the individual.
- This could lead to an increase in sockeye fishing and crowding on days designated as drift only.

I also do not support implementation of guide hours on guides not fishing from a boat for the following reasons:

- Increased crowding during times when the public normally uses this resource.
- Could lead to an increase in guide numbers.
- There is no biological need.



Report to the Alaska Board of Fisheries 2017





Contents

SUMMARY & RECOMMENDATIONS	3
THE MATANUSKA-SUSITNA BOROUGH FISH & WILDLIFE COMMISSION	5
NORTHERN COOK INLET SALMON FISHERIES	7
COHO ALLOCATION & ESCAPEMENT ISSUES.....	11
SUSITNA SOCKEYE AT RISK	14
UCI COMMERCIAL FISHERY VALUES	19
THE MIXED STOCK FISHERY PROBLEM.....	21
CENTRAL DISTRICT DRIFT GILLNET MANAGEMENT PLAN	25
THE CORRIDOR – SAFE PASSAGE HOME	28
KINGS STILL A CONCERN.....	32
PERSONAL USE FISHERIES – FOOD FOR ALASKANS.....	34
THE MAT-SU IS LOOKING AFTER FISH HABITAT	35
MATANUSKA-SUSITNA BOROUGH FISH & WILDLIFE COMMISSION PROPOSALS	38
REFERENCES.....	43



SUMMARY & RECOMMENDATIONS

This report was prepared by the Matanuska-Susitna Borough Fish and Wildlife Commission (referred to hereafter as the Commission) to address critical fishery management concerns under consideration by the Alaska Board of Fisheries in the 2017 Upper Cook Inlet meeting.

Current sport and personal use fisheries in Northern Cook Inlet fail to meet demand by the growing regional population.

- Sport fisheries have been heavily impacted by poor or sporadic coho and king returns. Angler days have fallen to the lowest level in almost 40 years.
- Declining sockeye numbers do not support consistent personal use opportunities in Northern Cook Inlet.
- The Northern Cook Inlet commercial set gillnet fishery for sockeye has been severely reduced over the last 30 years.

The Commission believes that the sustainability of Northern Cook Inlet salmon runs and fisheries has been placed at risk by overfishing in mixed stock commercial fisheries of the Central District.

- Commercial drift and set gillnet fisheries are managed primarily to maximize harvest of the large and productive Kenai and Kasilof sockeye stocks to the detriment of upstream fisheries and less productive salmon stocks.
- Commercial fisheries continue to harvest the majority share of coho despite a long-standing sport fishery priority for this species.
- Commercial fisheries harvest large numbers of Susitna sockeye despite continuing declines and chronic escapement failures.

Fishery management and harvest allocation in Upper Cook Inlet (UCI) has not kept pace with growing demand by the sport and personal use sectors, and is out-of-step with the economic and cultural realities of today. Management continues to be driven by commercial fisheries despite the much greater economic value and participation in sport and personal use fisheries.

- Less than 25% of the UCI salmon harvest is allocated to over 150,000 sport anglers and 30,000 plus personal use fishery households. Over 75% of the salmon harvest in Cook Inlet is taken by fewer than 1,300 limited entry commercial permit holders.
- Over half of the statewide sport fishing effort and the majority of the personal use fishery occurs in UCI Boroughs. UCI commercial fisheries produce less than 5% of the statewide total salmon harvest.
- Sport fisherman spent over \$100 million in the Matanuska-Susitna Borough and \$700 million in UCI during 2007. In contrast, ex-vessel value of salmon in the commercial fishery currently averages \$30 million per year. First wholesale in 2007 was \$77 million (last available estimate).



The Commission offers the following recommendations to the 2017 Board of Fisheries:

1. Continue to protect Stocks of Concern – particularly Susitna sockeye.

Susitna sockeye are currently a Stock of Yield Concern. Continuing declines and chronic escapement failures also qualify this stock for listing as a stock of management and conservation concern. Susitna sockeye are tremendously diverse but inherently less productive than Kenai and Kasilof populations which drive Upper Cook Inlet commercial fisheries. Freshwater productivity of Susitna sockeye also appears to be declining. The combination of declined productivity and continuing high harvest rates are a recipe for extinction. Freshwater production problems are an imperative for limiting exploitation, not an excuse for continued overfishing in the mixed stock commercial fishery.

2. Maintain the conservation corridor in the Central District drift gillnet fishery –it is working as designed.

The conservation corridor provides strategic time and area closures in the center of Cook Inlet and expands use of terminal fishing areas based on abundance of the Kenai and Kasilof sockeye. Following corridor adoption, significant increases were observed in sockeye and coho salmon runs to the Mat-Su, local sport fisheries and escapements. The uptick in salmon numbers is part of what we, the Commission, were asking for when the 2014 Alaska Board of Fisheries (BOF) adopted the current drift gillnet fishery management plan.

3. Limit commercial drift gillnet fishing in August to avoid excessive coho harvest.

The commercial drift gillnet fishery is currently closed by regulation in August when less than 1% of the season's total sockeye harvest is caught on two consecutive fishery openers. This rule provides flexibility to extend the commercial fishing season when the sockeye run is late and significant numbers continue to be available for harvest. The rule also ensures that commercial harvest of sport-priority coho and Kenai kings is limited after the sockeye run winds down. This closure rule, as adopted, was meant to be absolute except as otherwise provided under the commissioner's authority to manage to meet escapement goals as a first priority.

4. Continue to provide robust personal use opportunities where stocks permit.

Over 30,000 households now participate in the UCI personal use fishery, harvesting 600,000 or more sockeye salmon per year, primarily from Kenai or Kasilof rivers. The majority of participation comes from residents of areas outside the Kenai Peninsula including the Mat-Su as other regional personal use opportunities are quite limited. The Commission supports maintaining and enhancing personal use fishery opportunities wherever possible. Commercial fishery limitations including closure "windows" are essential for delivering fish to the rivers when sockeye are running. The Commission also supports proposals to increase in-river goals for Kenai late-run sockeye for consistency with current in-river harvest levels.

THE MATANUSKA-SUSITNA BOROUGH FISH & WILDLIFE COMMISSION



Left to right front row: Assembly Member Steve Colligan, Chair Terry Nininger, former Chair Larry Engel, Jehnifer Ehmann, Howard Delo. Back row L to R: Mike Wood, Andy Couch, Bruce Knowles, Assembly Member Jim Sykes

The Commission consists of eight dedicated volunteers appointed by the Mayor and Assembly to advise the Assembly and the Alaska State Boards of Fish and Game on policies that affect the resource and the people of the region.

Efforts by the Commission have been heavily focused on salmon concerns including:

- Conservation of diverse and productive natural habitats of fish and wildlife in balance with the needs of the people that live, work, and recreate throughout the region.
- Scientifically sound and sustainable fisheries and wildlife management.
- A fair and equitable balance in the allocation of fish and wildlife resources, values and opportunities for all users.

The Commission has actively supported the development and implementation of effective fishery management plans and strategies. We have sought to foster an effective working relationship with the Alaska Department of Fish and Game (ADF&G); providing regular input on research and management policies and strategies; facilitating the exchange of ideas and knowledge with Mat-Su residents. The Commission has also successfully worked through the Governor's and Legislature's budgeting process to secure critical funding for scientific research and monitoring, and to develop a comprehensive research plan for Mat-Su salmon and factors that affect them.

Commission Members

Members of the Commission combined have over three centuries of life, work and experience in the Mat-Su region, 50 years of expertise as state biologists, 70 years of experience as fishing guides, and 12 years of service on the State's Board of Fisheries.

Terry Nininger (Chairman) — Member of the Mat-Su Valley Fish & Game Advisory Committee and Planning Committee of the Mat-Su Basin Salmon Symposium. Retired, after a career in resource development in Alaska.

Larry Engel—Chair of the Alaska Board of Fish for three years, a member on the BOF for ten years, former fisheries biologist with ADF&G for 30 years including 20 years as Mat-Su Area Manager.

Jehnifer Ehmann — Former President of the Palmer Chamber of Commerce and an avid sports fisher. Chair of the Matanuska Valley Fish & Game Advisory Committee.

Howard Delo — Former member of the Alaska Board of Fish for three years and worked as a biologist with Fish & Game for 21 years, outdoor columnist.

Andy Couch — Fishing guide business owner for 30 years in the Mat-Su, member Matanuska Valley Fish & Game Advisory Committee, fisheries writer.

Mike Wood — Lives on the Susitna River, North of Talkeetna, where he works as a carpenter and builds remote log homes. During the summer he and his family travel to the mouth of the Susitna, to a camp on the Ivan River where they commercial set net fish.

Steve Colligan — Mat-Su Assembly member representative. Lifelong Alaskan and sportsman. Businessman and executive for over 25 years.

Jim Sykes — Mat-Su Assembly member representative. Long-term interest in hunting and fisheries issues since 1985, personal use fisherman, retired hunter and keen interest in sustainable future for fish and wildlife.

Bruce Knowles (emeritus member)—Veteran fishing guide and advocate for sustainable fisheries.



Borough Staff: Frankie Barker, Stefan Hinman, Patty Sullivan

NORTHERN COOK INLET SALMON FISHERIES

*Current sport and personal use fisheries
fail to meet demand by the growing regional population*

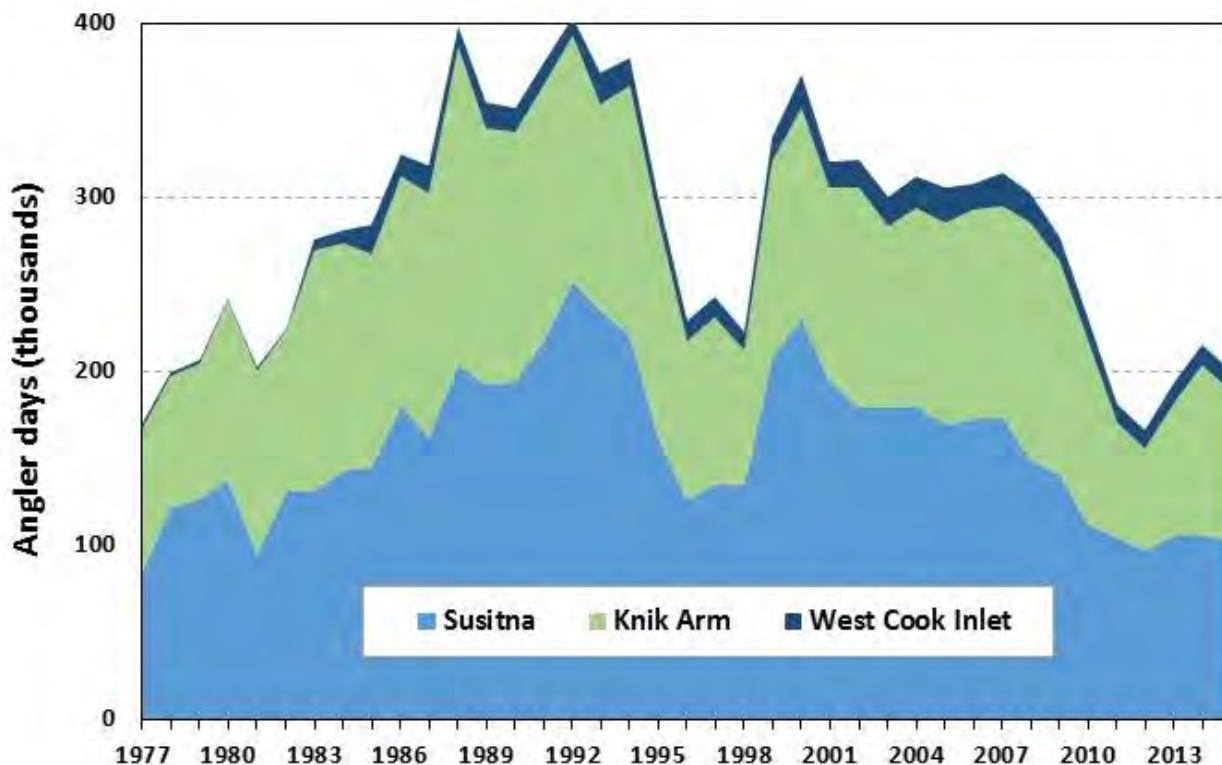


Figure 1. Angler days of sport fishing expended by recreational anglers fishing in Northern Cook Inlet Management Area waters, 1977-2015 (<http://www.adfg.alaska.gov/sf/sportfishingsurvey/>).

Declining Sport Fishery Participation

- Mat-Su area sport fisheries have been heavily impacted by recent poor King, inconsistent coho and limited sockeye returns to Borough waters.
- Angler days have fallen by over half from a peak of over 400,000 in 1992 to just 165,000 to 215,000 since 2011 – the lowest levels since the 1970s (Figure 1).
- This decline is striking in light of continuing population growth in Southcentral Alaska over this period.
- Effort started rebounding in 2014, with stronger returns of coho salmon to northern waters, following conservation corridor changes adopted by the Board of Fisheries.

Declining Sport Salmon Harvests

- Coho are by far the most popular target of Northern Cook Inlet sport fisheries, followed by Kings (Figure 2).
- Coho harvest has declined by more than 50% since the early 2000s (Figure 2).
- Recent king salmon sport harvests show an 80% decline from peaks in the 1990's. Low king salmon returns and fishery restrictions have particularly impacted road-accessible streams on the east side of the Susitna River.

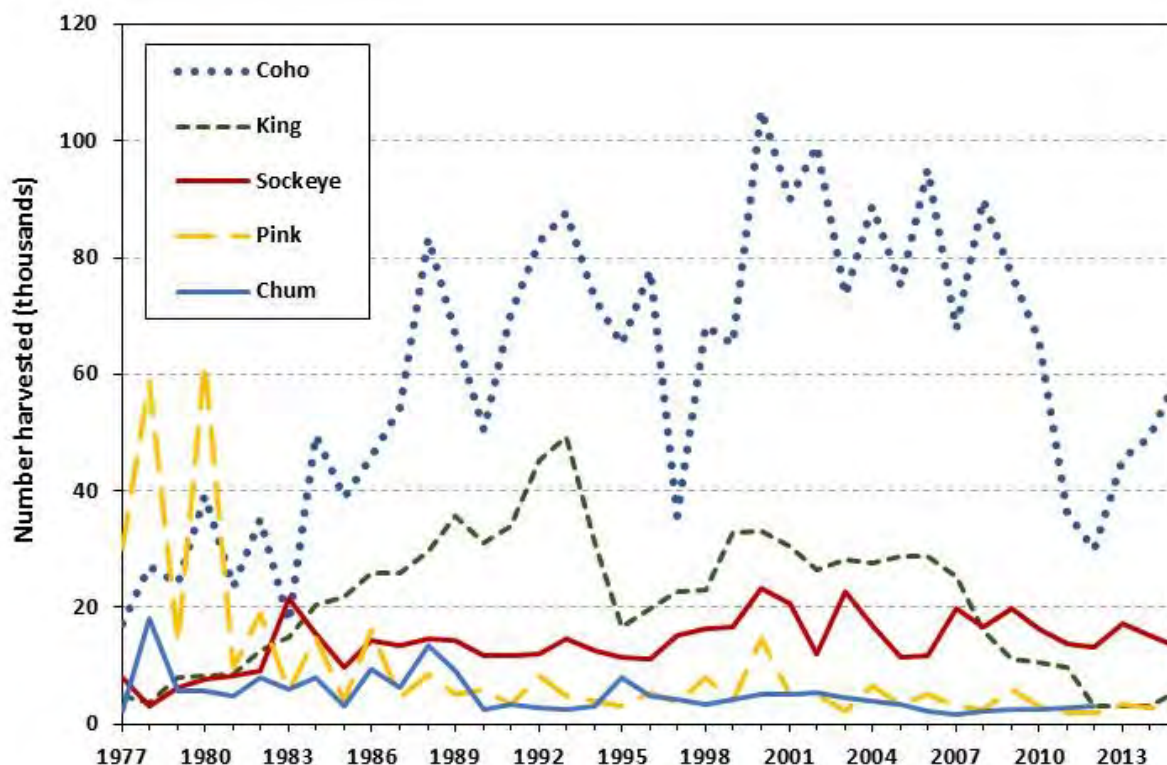


Figure 2. Salmon harvest by recreational anglers fishing in Northern Cook Inlet Management Area waters, 1977-2015 (data from Oslund et al. 2013; Statewide Harvest Survey).

Limited Personal Use Access

- Consistent annual personal use opportunities do not exist in Northern Cook Inlet.
- Only one personal use fishery exists in Northern Cook Inlet (Fish Creek), and too few fish return in most years to open this fishery.
- Northern Cook Inlet residents currently travel to the Kenai Peninsula (or Chitna on the Copper River) to access significant numbers of salmon for personal use.

Limited Northern Cook Inlet Commercial Fishery

The Northern District of Cook Inlet begins at the narrowest part of Cook Inlet and extends to the Susitna River, Knik and Turnigan Arm. This is a set net fishery and no drift fleet is allowed. This is a small-scale, family run fishery with a myriad of difficulties including transport of catch to a processor in the Kenai or Anchorage. Many fisherman have adapted by direct marketing with catcher-seller permits for residential markets in their local areas.

- About 90 Northern District set gillnet permits are registered on average and 80 are fished.
- Harvest by this fishery has been substantially reduced since the 1990s (Figure 3).
- Sockeye harvests have increased since implementation of the conservation corridor in 2014.

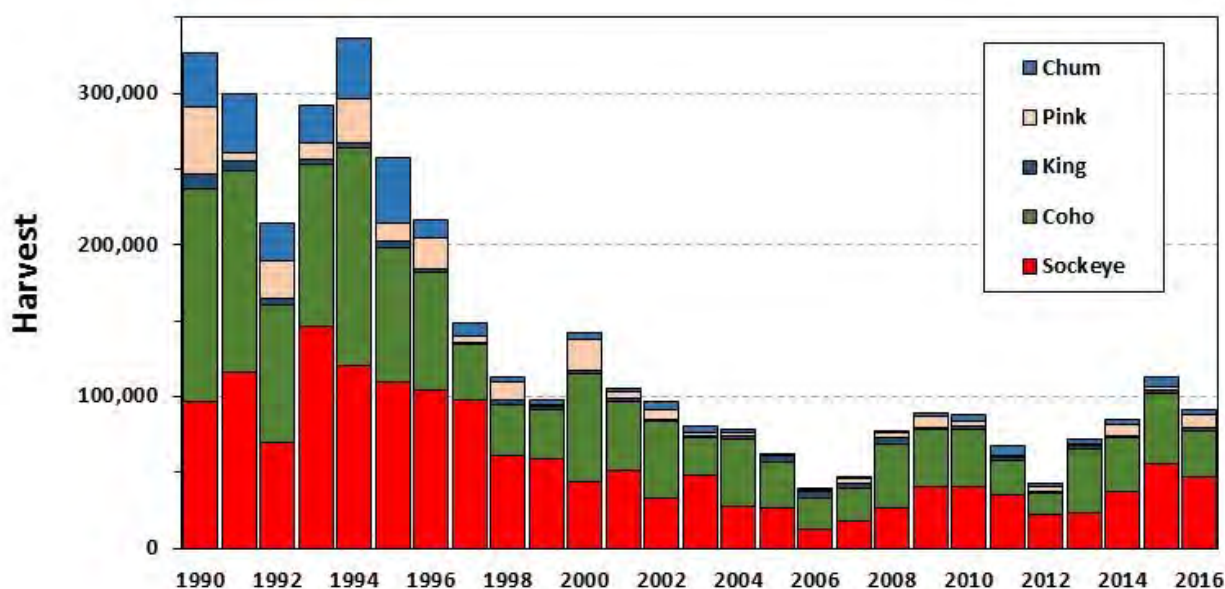


Figure 3. Salmon harvest in Northern District commercial set gillnet fishery.

This fishery varies greatly depending on the location of individual set net fisherman. Primarily it is a "flood tide fishery" lasting only 4 hours total in that 12-hr. period. Legal fishing periods begin in late May/early June for King salmon. One, 12-hour opener occurs per week for the entire Northern District (except recording area "Beluga" at the mouth of the Chuitna, Theodore, Lewis and Big Susitna River, where no fishing is allowed for King salmon due to a "stock of Concern" status). A total of 1,500 to 2,000 king salmon are harvested a year on average in the whole Northern District fishery. Beginning late June, the Northern District fishes every Monday and Thursday for a 12-hour period, being allowed to use a full complement of gear (three 35 fathom nets, set a distance of at least 600' apart). In mid-July ADF&G reduces the gear to 1 net per permit for three openers. The season typically tapers off in August but varies greatly throughout the Northern District of Cook Inlet.

Unbalanced Harvest Sharing

- Harvest allocation in Upper Cook Inlet has not kept pace with growing demand by sport and personal use sectors, and is out-of-step with today's economic and cultural realities.
- Fishery management continues to be driven by commercial fisheries despite much greater economic value and participation in sport and personal use fisheries.
- Less than 25% of the UCI salmon harvest is effectively allocated to over 150,000 sport anglers and 30,000+ personal use fishery households.
- Fewer than 1,300 commercial permit holders take over 75% of the UCI salmon harvest.

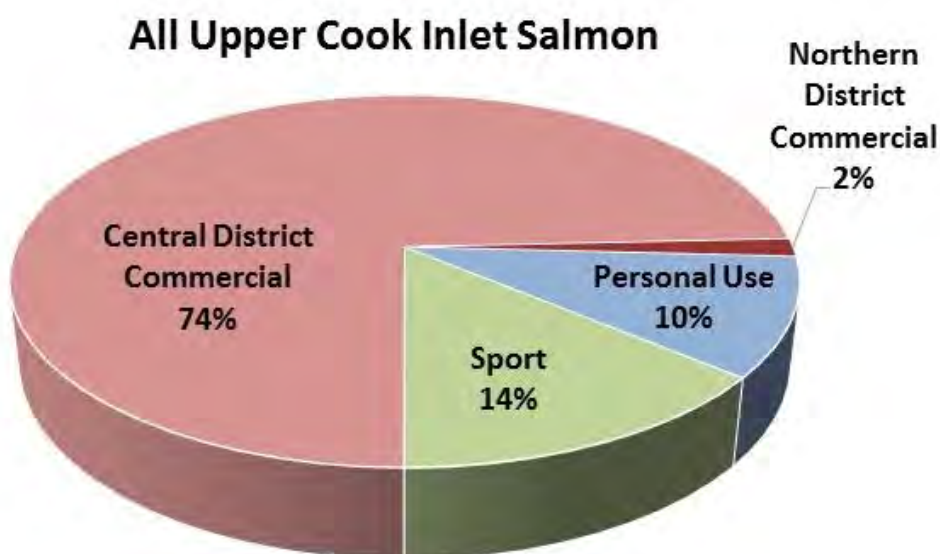


Figure 4. Recent (2006-2015) harvest shares of Upper Cook Inlet salmon among commercial, sport, and personal use fisheries as a result of current management plans.

Myth: *UCI Salmon Management is not science based.*

Fact: *Regulatory decisions by the Board of Fisheries are firmly grounded in science but also guided by values and expectations of the stakeholders.*

Science informs but does not dictate resource management decisions. It does not and cannot provide an objective basis for choosing human goals embedded in decisions. Nor is science an allocative weapon. It is a body of organized information, interpretations and qualifications developed to minimize subjectivity – in our case regarding fishery management decisions. Science identifies alternatives, tradeoffs, risks, and uncertainties. To the Board of Fisheries falls the responsibility of identifying fish management plans that balance and optimize sometimes competing fishery values.

COHO ALLOCATION & ESCAPEMENT ISSUES

Commercial fisheries continue to harvest the major share of coho despite a long-standing sport fishery priority for this species

For more than 35 years, Upper Cook Inlet salmon management plans have stipulated that the drift fishery harvest of northern-bound coho is to be minimized in order to provide sportfishers and guided sportfishers with reasonable opportunity to harvest these salmon. Until recently, implementation of this clear directive has not been happening. The drift gillnet fleet continues to catch large numbers of northern-bound coho as "bycatch," while they are actually targeting Kenai sockeye.

Harvest Imbalance

- Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.
- The commercial drift gillnet fishery is the primary harvester of coho destined for Northern Cook Inlet streams.
- Since 2000, the drift fleet fishery has harvested over 100,000 coho per year on average versus 65,000 in the Susitna/Knik sport fishery.

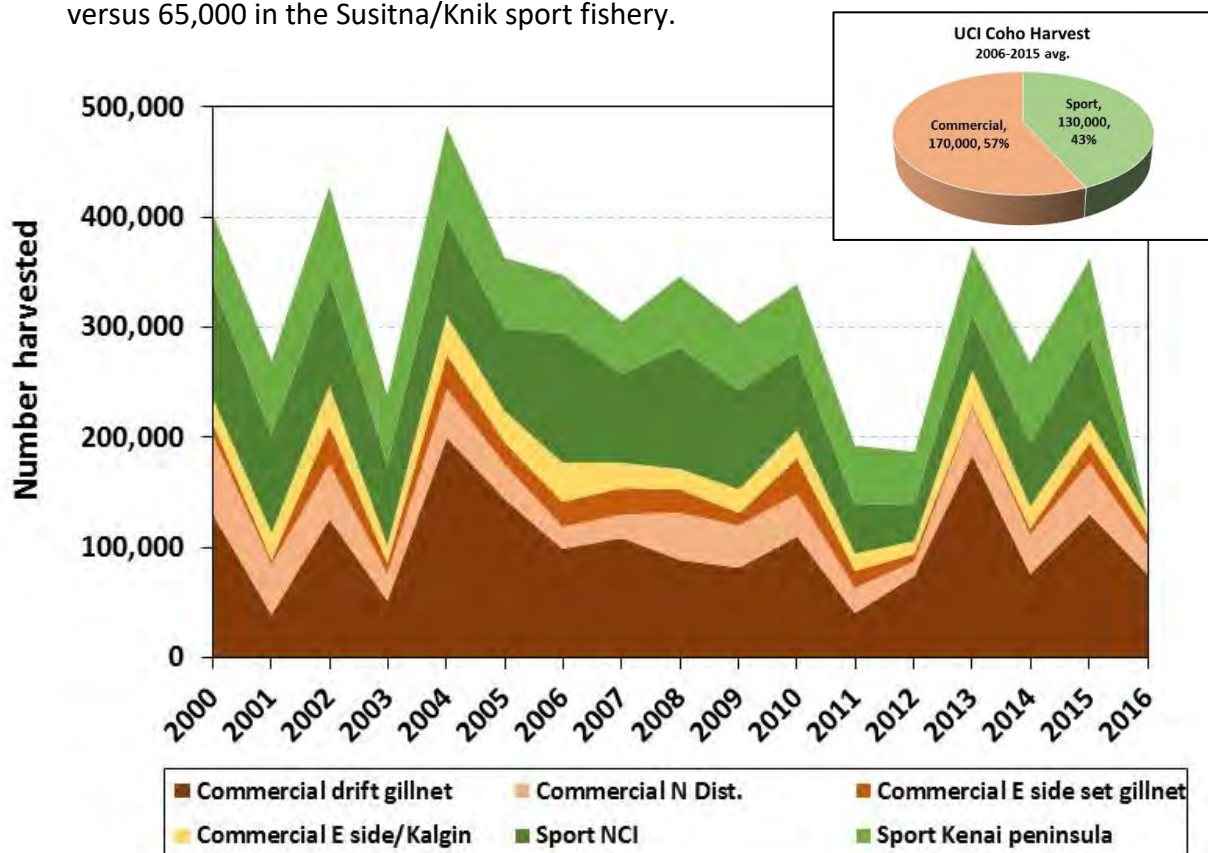


Figure 5. Annual harvest and harvest shares of coho in Upper Cook Inlet by fishery. (Sport harvest numbers for 2016 are not yet available.)

Abundance

- Coho Salmon return to practically every accessible stream in the region.
- Susitna drainages support the largest coho returns in Cook Inlet, with returns historically numbering several hundred thousand fish.
- Coho are counted in only a handful of the hundreds of Northern Cook Inlet streams to which they return. Numbers fluctuate widely but approached 20-year lows in 2011-2012 (Figure 6).
- Mark-recapture estimates by ADF&G for the Susitna River above river mile 30 and the Yentna rivers ranged from 158,700 to 216,900 in 2010-2014.

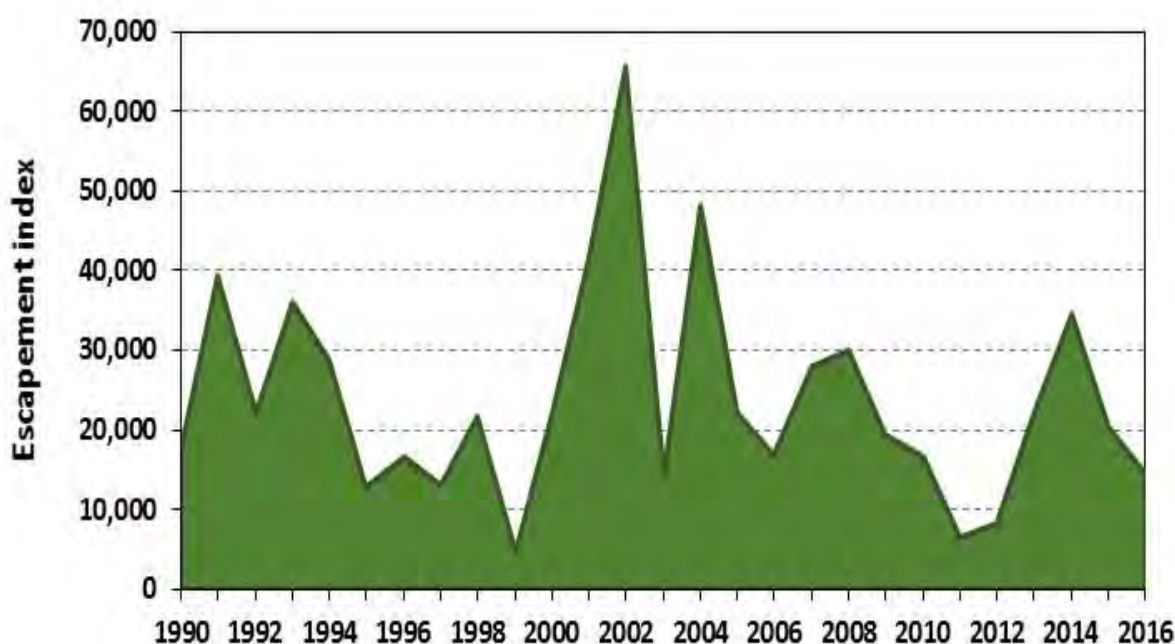


Figure 6. Escapement index for Northern Cook Inlet coho salmon (total of index counts from Little Susitna River, McRoberts Creek, and Fish Creek).

Escapement

- Coho consistently failed to meet escapement goals from 2010-2012.
- Escapement of Northern Cook Inlet coho is monitored relative to goals in three Knik arm streams (Little Susitna River, McRoberts Creek, and Fish Creek).
- There are presently no escapement goals for Susitna River drainage coho salmon.

Table 1. Goals and recent escapements of NCI coho. Escapements below goals are highlighted.

	Goal	2010	2011	2012	2013	2014	2015	2016
Little Susitna	10,100-17,700	9,214	4,826	6,779	13,583	24,200	12,421	9,998
McRoberts Cr. ^a	450-700	242	229	213	663	122	571	106
Fish Creek	1,200-4,400	7,034	1,428	1,237	7,593	10,283	7,370	4,483

^a McRoberts Creek is a tributary in Jim Creek drainage.

Management

- Sport fisheries continue to be constrained by current low coho abundance.
- Bag limits throughout much of Northern Cook Inlet have been reduced from three to two coho per day.
- Regular bait restrictions also limit angler participation and harvest levels.
- In 2016 for instance, no bait use was allowed in the Little Susitna during the coho fishery. Bait use was limited to only eight days during the king salmon season (July 6 - 13). The Little Susitna River provides one of the Northern Management Area's most heavily used sport fisheries for both king salmon and coho salmon.



Myth: *Commercial fishery impacts on coho are insignificant.*

Fact: ***Commercial harvest patterns affect the success of all other fisheries operating in their shadow.***

Claims of low commercial exploitation rates on coho are based on subjective interpretations of limited data and ignore substantial evidence to the contrary. Commercial gillnet fisheries are extremely effective harvesters of UCI salmon including millions of sockeye per year and tens or hundreds of thousands of comingled coho. Commercial harvest is concentrated on the front end of the coho run which effectively delays delivery of significant coho numbers to freshwater sport fisheries by several weeks in spite of a long-standing sport fishery priority for this species. ADF&G consistently argues to maintain low bag and possession limits for sport fishermen. If there are not enough coho to support more liberal sport fishery limits, there are no surplus coho for additional commercial harvest.

SUSITNA SOCKEYE AT RISK

Continuing declines and chronic escapement failures of Susitna sockeye qualify this stock for yield, management and conservation concerns

Stock of Concern Designation

- Susitna sockeye salmon were designated as a Stock of Yield Concern in 2008.
- ADF&G recommended continuing the Stock of Concern designation at the 2016 Board Work Session.
- Management actions to date have failed to stabilize or rebuild this stock.
- Similar trends have resulted in listing of many lower 48 salmon stocks under the U.S. Endangered Species Act.

Declining Abundance & Harvest (Yield)

- Average returns and harvest have fallen by over half during the last 30 years.
- This decline has occurred during a period of historically high abundance of sockeye stocks throughout Alaska.

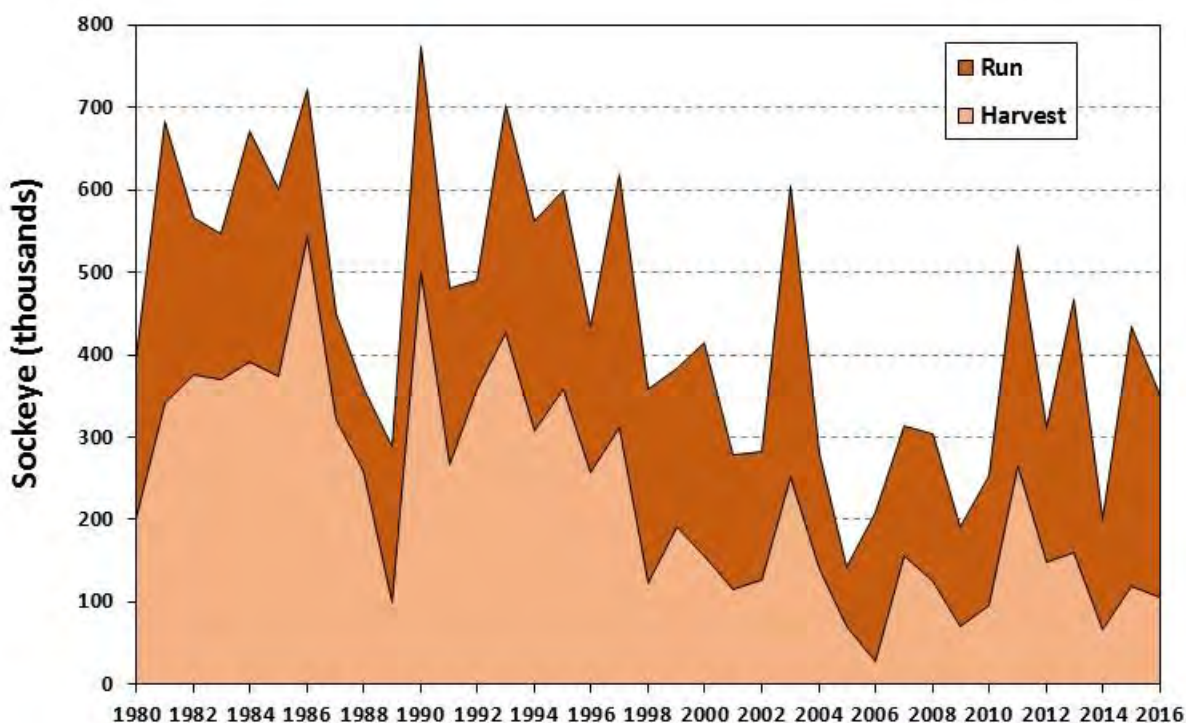


Figure 7. Historical Susitna sockeye run to Upper Cook Inlet (Tobias & Willette 2013; Shields & Dupuis 2016).

Failing Escapements

- Sockeye consistently fail to achieve escapement goals established for four Northern Cook Inlet populations (Table 2).
- The three Susitna sockeye goals (Chelatna, Judd, Larsen) have all been met just once since they were established in 2009.
- Susitna sockeye have a long history of falling short of established goals. Prior to 2009, escapement fell short of Yentna Sonar goals in five of the previous nine years of monitoring.
- Escapement goals have been periodically reduced or replaced as Susitna sockeye continue to decline. Goal reductions are again proposed for 2016 in the current escapement goal review (Table 2).
- Escapement goals are not defined for Shell Lake sockeye but the drastic decline of this population provide an obvious justification for a stock of conservation concern designation.

Table 2. Goals and escapements for Northern Cook Inlet sockeye. Escapements less than goals are highlighted.

Year	Chelatna	Judd	Larsen	Fish	Shell
Goals	20,000-65,000^a	25,000-55,000^a	15,000-50,000^a	20,000-70,000^b	No goal
2006	18,433	40,633	57,411	32,566	69,720
2007	41,290	58,134	47,736	27,948	26,784
2008	73,469	54,304	35,040	19,339	2,624
2009	17,865	43,153	41,929	83,477	4,968
2010	37,784	18,361	20,324	126,829	2,223
2011	70,353	39,997	12,413	66,678	937
2012	36,577	18,303	16,708	18,813	No data
2013	70,555	14,021	21,810	18,912	133
2014	26,212	22,416	12,040	43,915	No data
2015	69,897	47,934	23,185	102,012	
2016	60,785	No count ^c	14,187	46,202	
Goals (2017)	20,000-45,000	15,000-40,000	15,000-35,000	15,000-45,000	No goal
Pike	Yes	No^d	No	Yes	Yes

^a Established in 2009.

^b Established in 2002.

^c Not counted due to lack of funds.

^d Judd Lake is not identified on ADF&G's list of waters with invasive pike. Cook Inlet Aquaculture Association has conducted fish enumeration studies in Judd Lake and has neither observed pike or received first-hand accounts of their occurrence in Judd Lake (Gary Fandrei, CIAA, personal communication on 1/30/17).

Production Issues

- Susitna sockeye are tremendously diverse and include over 30 populations that spawn and rear in lakes, rivers, and sloughs throughout the system.
- Many of these systems are inherently far less productive for sockeye than the large lake systems of the Kenai and Kasilof rivers.
- There is little doubt that freshwater productivity of Susitna sockeye has declined. Invasive pike have apparently impacted salmon numbers in many lower elevation waters. Climate change, upstream fish passage, beavers and disease may also be factors.

Myth: Pike & Beavers Excuse the Need for Commercial Fishery Limits

Fact: Freshwater production problems are an imperative for limiting harvest, not an excuse for continued overfishing.

Uncomfortable with recent changes to fishing regulations, some leaders of the commercial drift fleet heap blame on Mat-Su habitat as the main cause for the area's weak salmon returns. This criticism is contrary to modern principles of sustainable salmon fishery management.

The combination of reduced freshwater productivity and significant fishery exploitation is a recipe for salmon stock extinction. Commercial fisheries cannot be held harmless for habitat issues where limits are needed to sustain the salmon resource. Production concerns for Northern Cook Inlet salmon including sockeye will require reductions in historical levels of exploitation in order to avoid long-term conservation problems.

The myth here is that participants in UCI commercial fisheries have nothing to do with the challenges facing fish habitat even though many of these people live in the region and enjoy the roads, utilities and other modern developments. Cook Inlet is the most highly populated and urbanized region of the State. Development provides homes and jobs but inevitably affects fish habitat in areas where people concentrate. While impacts of development can be and are being mediated, does anyone really think that twenty years from now we will have fewer cities, towns, roads, subdivisions, schools and shopping malls or that 50 years of pike invasion can be cost-effectively reversed in hundreds of miles of streams?

The question is not whether factors like culverts, beavers, and pike impact salmon but rather what habitat and fishery strategies are necessary to sustain salmon populations and fisheries in the face of these pressures. Substantial habitat protection and restoration initiatives have been undertaken by the Matanuska-Susitna Borough and partners. If the fish truly come first and maximizing total harvest is secondary, then precautionary fishery management strategies for impaired stocks such as Susitna sockeye must also be part of the solution.

Commercial Overexploitation

- Freshwater production issues for Susitna sockeye are compounded by continuing high rates of exploitation in Central District commercial fisheries.
- Current exploitation rates average about 40% and may be even higher in large Kenai sockeye return years. Historical rates often reached 60-70% which was nearly twice what Susitna sockeye could sustain.
- High fishing rates continue to be rationalized by: 1) the high costs of reduced fishing in terms of foregone harvest of the more abundant and productive Kenai and Kasilof sockeye, and 2) little commercial yield benefit of increased Susitna sockeye escapement due to low productivity.
- While ADF&G has failed to develop criteria for identifying conservation stocks of concern under the Sustainable Salmon Policy, several populations of Susitna sockeye are very obviously in conservation crisis (Table 2).
- The combined impact of freshwater production issues and continuing harvest levels impose a significant conservation concern for marginal Susitna sockeye populations that do not have escapement goals.

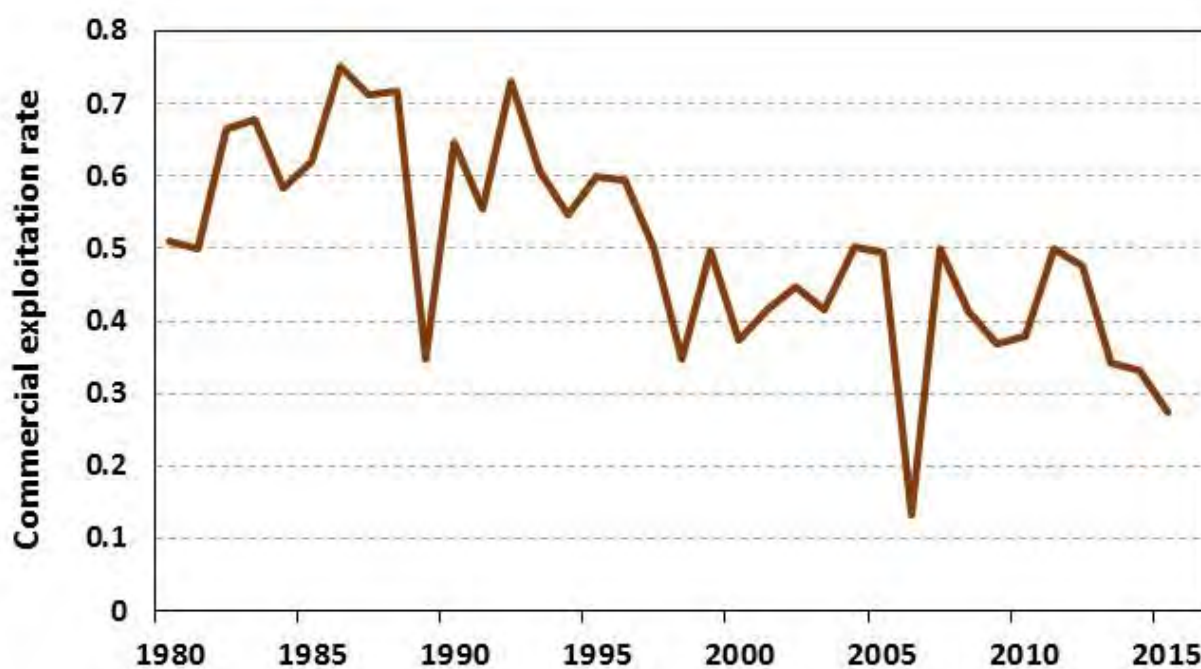


Figure 8. Annual exploitation rates of Susitna sockeye in UCI commercial fisheries based on run reconstructions (Tobias & Willette 2013; Shields & Dupuis 2016).



UCI COMMERCIAL FISHERY VALUES

Rumors of commercial fishery demise are greatly exaggerated

UCI commercial fisheries continue to enjoy great success, driven by consistently strong returns of Kenai and Kasilof sockeye. These valuable and lucrative fisheries harvest an average 3 million sockeye per year and many thousands of intermingled coho and kings (Figure 10).

- Implementation of the conservation corridor has clearly not reduced the success of the Central District commercial fishery when measured in ex-vessel value of the catch (Figure 11).
- Ex-vessel values of the UCI salmon harvest since 2011 when the regulation was first adopted, were more than double the 20-year average.
- The drift gillnet fishery produced some of the highest values in the last 20 years while fishing in expanded terminal fishing areas in recent years where the east side set gillnet fishery was restricted to protect poor king runs.

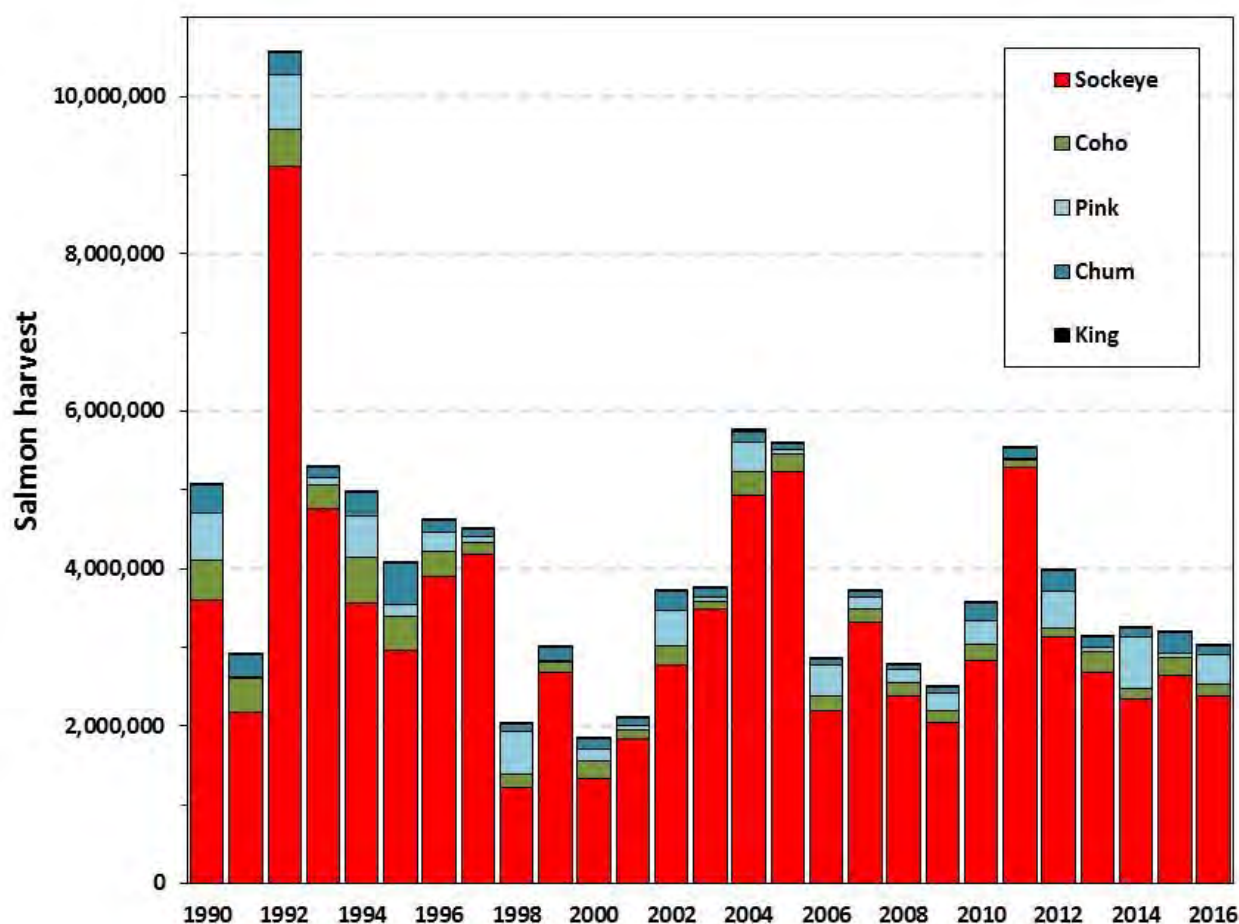


Figure 10. Annual harvest of salmon in UCI commercial fisheries.

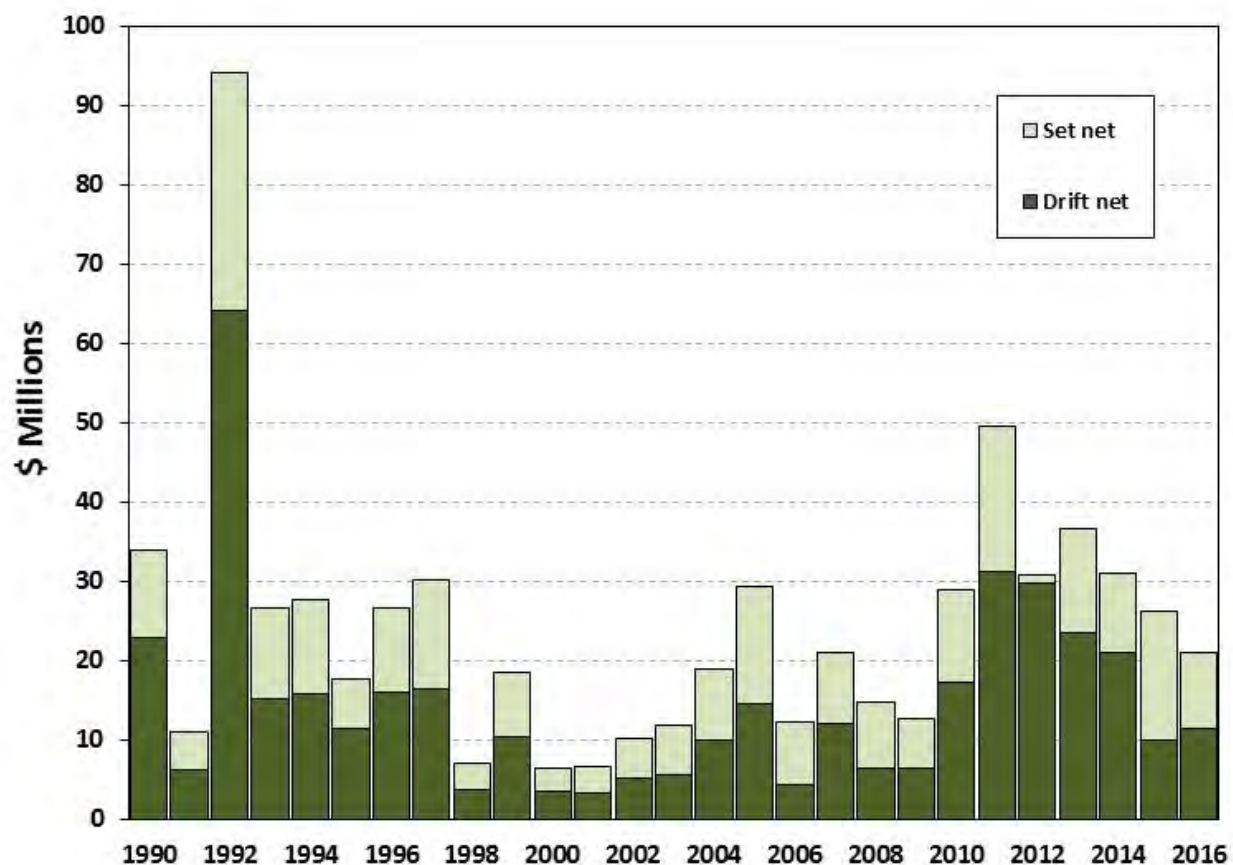


Figure 11. Annual ex-vessel value of UCI commercial sockeye salmon fishery harvest (data from Shields and Dupuis 2016).

Myth: Maximizing UCI commercial harvest maximizes salmon economic value.

Fact: The essential economic question in Cook Inlet is not which fishery is more valuable but rather how to optimize the combined value of commercial, sport, personal use, and subsistence fisheries.

Successful sport, personal use, subsistence and commercial fisheries are all vital to the economic and social well-being of people throughout Upper Cook Inlet (UCI). The economic value of the commercial salmon fishery has long been recognized but equivalent or greater values of sport and personal fisheries in Cook Inlet have only recently been realized. The needs and values of no single user group are preeminent. An honest discussion of UCI fisheries issues must recognize the perspectives, needs, and values of each of the competing fishery interests. Each fishery deserves a reasonable opportunity and a fair share of the common property salmon resource.

THE MIXED STOCK FISHERY PROBLEM

Large numbers of northern-bound salmon are harvested in Cook Inlet by a mixed species and stock commercial gillnet fishery managed primarily for Kenai and Kasilof sockeye

The single most important human factor impacting Northern Cook Inlet salmon returns is interception in intensive gillnet fisheries for mixed species and stocks in marine waters of Upper Cook Inlet.

Without question, the management of Upper Cook Inlet salmon is complicated by the great differences in the biological productivity of the various species and stocks and their overlapping run timing. Kenai sockeye are highly productive and can be harvested heavily, but many north-migrating salmon cannot withstand similar harvest pressure. Maximizing the benefit from a strong stock can come at a cost to others, as has happened all too often for Mat-Su salmon.

The problem with mixed stock fisheries targeting strong stocks is that they overfish less productive stocks included in the mix. The less productive stocks in the mix simply cannot sustain the same high harvest rates as the more productive stocks. That is why Alaska primarily manages its salmon fisheries in terminal harvest areas rather than mixed stock areas.

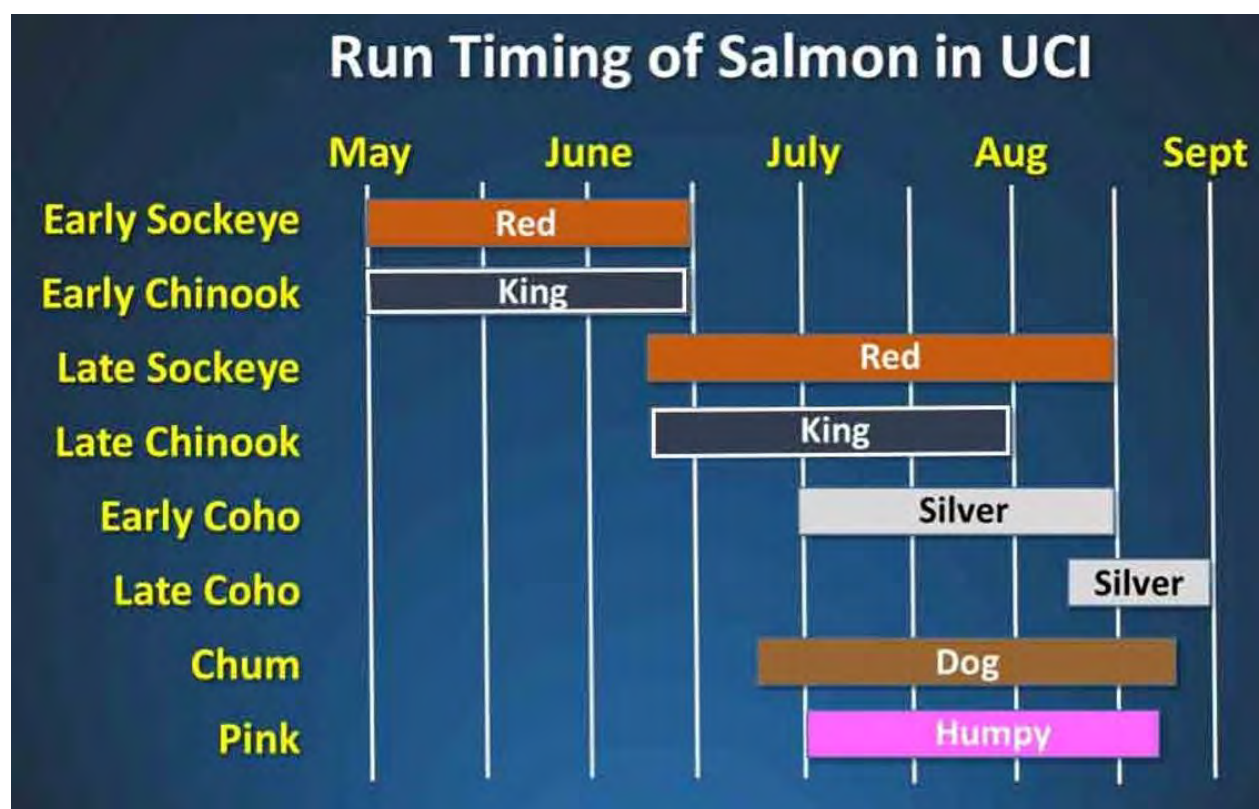


Figure 12. Run timing of major salmon stocks in Upper Cook Inlet.

Kenai sockeye come from large lakes which are among the most productive sockeye habitats on the planet.

- Kenai and Kaslof sockeye return 4.5 fish per spawner on average.
- This means that nine sockeye are produced for every two spawners, and stocks can sustain themselves at annual harvest rates of 70% (Figure 13).
- In fact, Kenai sockeye are among the most heavily exploited sockeye stocks in the world.

Susitna sockeye originate in a variety of smaller lakes, rivers and sloughs, which are inherently much less productive.

- Susitna sockeye return less than 1.5 fish per spawner which means that they are overfished at much lower rates than Kenai sockeye can support.
- Therefore, if only three Susitna sockeye salmon are produced per spawning pair only one Susitna sockeye offspring (compared to seven Kenai sockeye offspring) may be harvested if the stock is to sustain itself over time.
- Productivity has been reduced in freshwater by factors including predation by non-native pike.

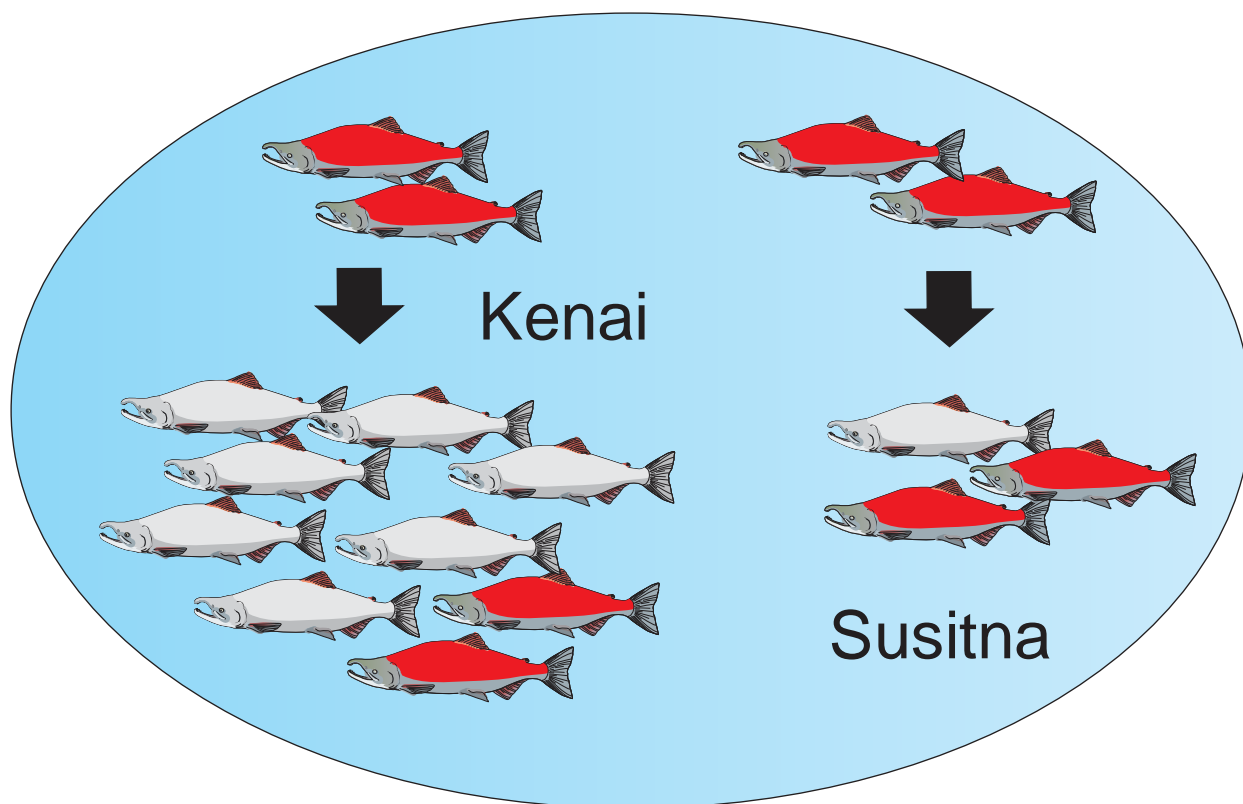
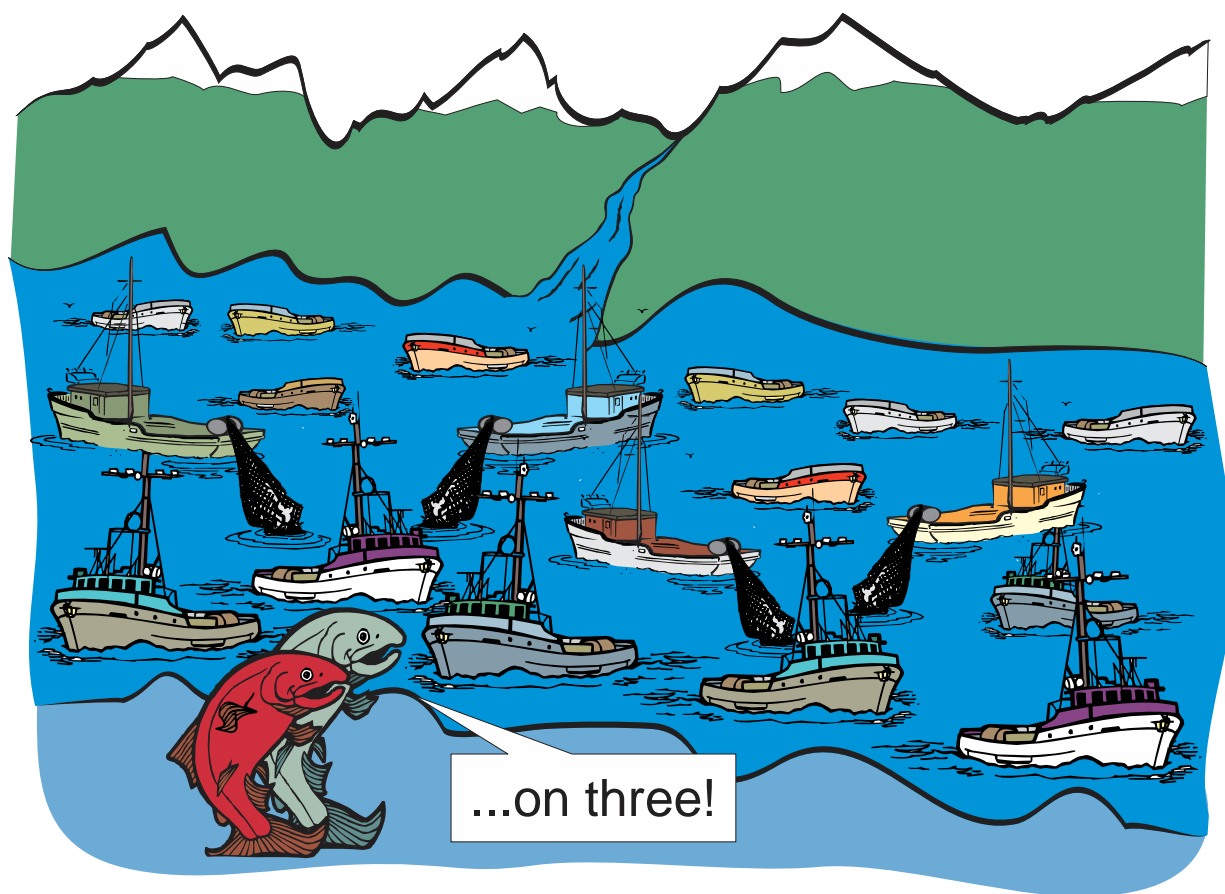


Figure 13. Return per spawner of Kenai and Susitna sockeye. Harvestable surplus is identified as silver and replacement spawner fish are red.

ADF&G has historically failed to implement effective management tools and authority to protect northern stocks of sockeye and coho from the Central District mixed stock commercial fishery. Too few northern inlet salmon historically made it through the Central District commercial fishery to consistently achieve spawning escapement goals or support upstream subsistence, sport, guided sport, commercial, or personal use fisheries.

Thus, the Central District commercial fishery is overfishing Susitna sockeye beyond their capacity to sustain maximum yields. Current fishing rates, in combination with freshwater production issues, have likely reduced some Susitna sockeye populations to the point of a severe conservation concern. The commercial fishery is also overfishing coho well beyond its fair share relative to the long-established sport fishery priority for this species.

Management of the Inlet's weak and strong stock "mix" often results in substantial conflict among user groups. When commercial fishermen have a banner year for sockeye, sport fishermen often face closures because of few returning coho. By studying when and where specific stocks and species are located in the inlet, hotly-contested harvest practices can hopefully be fine-tuned to benefit all users of this common property resource.





Myth: Limited Entry & Traditional Management Strategies are All We Need for Effective UCI Fishery Management

Fact: There is far more commercial fishing gear in the marine waters of UCI each summer than is needed to effectively harvest the available surplus of salmon. In the long-term, commercial fisheries can prosper but management must evolve toward fishing more selectively.

Limited entry, the state statute that placed a maximum number on participants in commercial fisheries by gear type and region, does nothing to limit the harvest potential of the commercial salmon fisheries of UCI. The commercial salmon fishery in UCI is substantially overcapitalized and a reduction in gear could be beneficial but a rationalization or buyout strategy does not seem to be impending. On average, only about 65% of the gill net permits are fished during any given season. The others are considered to be “latent.” There is no room for additional set net gear along the shores of the Kenai Peninsula.

The historical tools used to manage UCI gill net fisheries have limited utility when used in the traditional manner for one simple reason. They lack effective selectivity between stocks and species. New tools are necessary to meet evolving demands of these complex mixed species, stock and user fisheries for the benefit of all involved. Recent innovations including closure windows and shallow nets for the set net fisheries, and terminal harvest strategies and conservation corridors for the drift gill net fishery, are just a few of the potentially effective management tools that may be employed to optimize harvests.

The market price of fresh, high quality, wild Alaska salmon and the demand for this outstanding product is high. UCI commercial fisheries will continue to prosper even when providing plenty of kings and coho for successful sport fisheries and sockeye for personal use. The magnitude of expected loss resulting from reconfiguration of gillnet fisheries in the manner selected by the Board of Fisheries in 2014 is no more than 5-10% of the year’s total ex-vessel value. In contrast, the normal annual variation in ex-vessel value which has ranged from less than \$8 million to more than \$53 million over the past 25 years.

The commercial ex-vessel value foregone to manage more selectively is small relative to annual variations in sockeye harvest and price per pound paid to the fisherman. The forgone value is far less than the economic contribution of a successful sport fishery.

Cook Inlet salmon are a tremendous, renewable, natural resource with the capacity to support vibrant sport, personal use, commercial and subsistence fisheries. However, the days of strong stock, single industry salmon fisheries in UCI are past. It is time to shape the successful fisheries of the future. The ability to innovate and adapt will be key to future fishery success.

CENTRAL DISTRICT DRIFT GILLNET MANAGEMENT PLAN

“The purpose this management plan is to ensure adequate escapement of salmon into the Northern District Drainages.” [5 AAC 21.353]

The drift gillnet fishery of the central district is the most powerful and mobile of all commercial fisheries in UCI. The fishing power of the commercial fleet is tremendous. The drift fleet has demonstrated an ability to harvest more than half a million salmon in a single day during the peak of a strong run. The drift gillnet fleet is the primary harvester of north-bound salmon. Commercial interception of northern inlet sockeye and coho dwarfs harvest of these stocks in upstream sport fisheries.

The drift gillnet management plan includes a suite of actions that acknowledge the need to pass northern salmon and harvest Kenai sockeye.

Timeframes

July 9-15: primarily for passage of Susitna sockeye with northern coho as a secondary objective.

July 16-31: primarily for passage of northern coho with Susitna sockeye as a secondary objective.

August 1 to close: the primary objective is to protect coho after the 1% rule signals the conclusion of significant drift gillnet sockeye harvest.

Kenai Sockeye Run Strength Triggers

Less than 2.3 million Kenai sockeye: Maximum passage of northern salmon.

2.3 to 4.6 million Kenai sockeye: Moderate passage of northern salmon.

More than 4.6 million Kenai sockeye: Minimum passage of northern salmon.

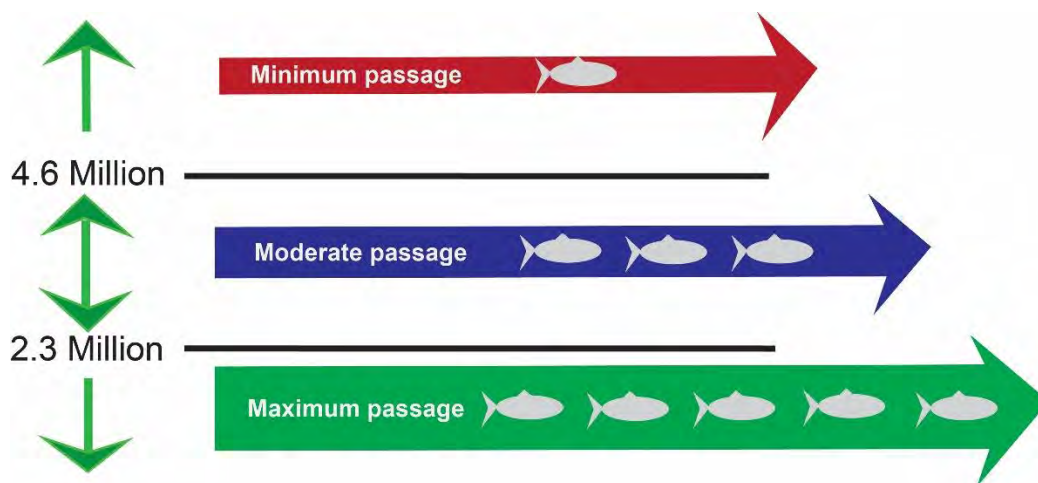


Figure 14. Relative effects of Kenai sockeye run strength triggers in the drift gillnet fishery management plan on passage of salmon into northern Cook Inlet waters.

Drift Gillnet Harvest Areas

District-wide: Employed to maximize drift harvest of Kenai and Kasilof sockeye salmon but can over harvest less productive northern sockeye and coho at the same time.

South of Kalgin Island (Area 1): Allows drift harvest of Kenai and Kasilof sockeye, while still allowing northern-bound sockeye and coho salmon the opportunity to migrate through the Area 2.

Kenai & Kasilof Sections: Narrow bands outside the eastside set gillnet fishery historically used to target local returns. Use is generally infrequent and catches typically low.

Expanded Kenai & Kasilof Sections: Terminal harvest areas designed to focus harvest on Kenai and Kasilof while providing a conservation corridor through the Central Inlet for passage northward of Susitna sockeye and northern inlet coho.

Anchor Point Section: Adopted by the 2014 BOF to allow fishery opportunity to Homer-based fishers during some periods when the conservation corridor is in place.

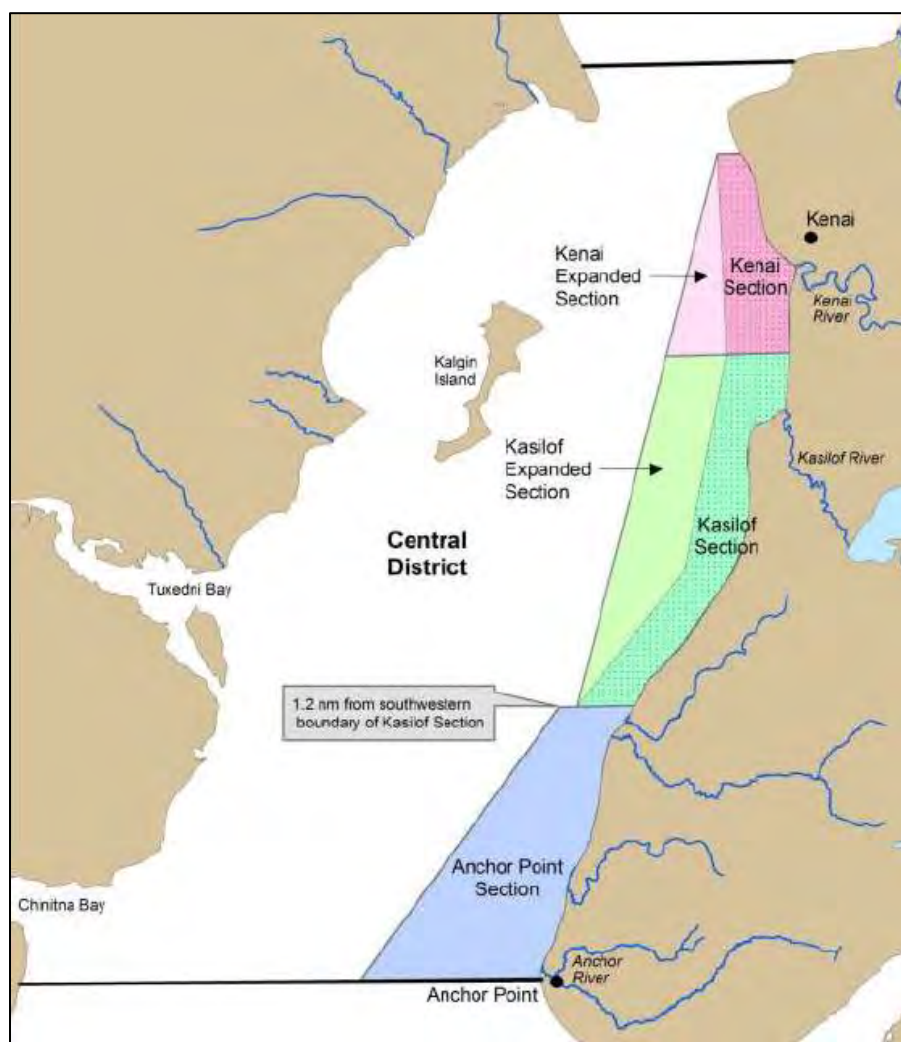


Figure 15. Map of drift gillnet fishery terminal harvest areas, including the Kenai and Kasilof sections, Expanded Kenai and Expanded Kasilof sections, and the Anchor Point Section (ADF&G Figure).

Table 3. Summary of key time and area provisions of the Central District Drift Gillnet Management Plan.

Dates	Kenai sockeye	District wide	Area 1	Expanded Kenai & Kasilof sections	Anchor Point section	Areas 3&4
Jun 19 ^a – Jul 8	--	2 reg. periods / week				
July 9–15	--		2 reg. periods / wk			
			Additional time allowed			
	>2.3 mil		1 additional 12-hr period			
July 16–31	< 2.3 mil		All periods			
	2.3-4.6 mil		1 reg. period / wk			
			1 period / wk			
	> 4.6 mil	1 reg. period / wk	1 reg. period / wk			
	(all)		Additional time allowed			
August 1–15	--	2 reg. periods / wk ^b				Periods following 1% closure
After Aug 16	--					Until closed by EO

^a3rd Monday in June or June 19, whichever is later.

^b Closure triggered by 2 consecutive fishing periods of less than 1% of the seasons' total sockeye catch taken per period.

Myth: UCI Management Violates the Magnuson-Stevens Act (MSA)

Fact: *Claims of inconsistency are an effort to end run the state BOF process for a federal process that has historically been heavily weighted toward commercial fisheries and far less accessible to the public.*

The Magnuson–Stevens Fishery Conservation and Management Act is the primary law governing marine fisheries management in United States federal waters. Management of salmon in the Upper Cook Inlet is very obviously consistent with the national standards of the MSA involving management for optimum yield and use of the best available science. The North Pacific Fishery Management Council historically referred management of Alaska salmon to the State with good reason.

Alaska's world-best salmon fisheries are a testament to the effectiveness of the current Board of Fishery process. Attacks on this process are nothing more than a cynical attempt to return to bygone days when a Board, dominated by commercial interests, allocated the vast majority share of the UCI salmon harvest to commercial fisheries.

THE CORRIDOR – SAFE PASSAGE HOME

The data show clear benefits of the conservation corridor for northern-bound salmon with little or no impact on commercial fishery value

The “conservation corridor” regulation is designed to increase passage of northern-bound salmon through the mixed stock commercial fishery. The Drift Gillnet Fishery Management Plan restricts some fishing periods to terminal harvest zones in order to focus the harvest on abundant and valuable Kenai and Kasilof sockeye stocks. Terminal harvest zones are referred to as the Expanded Kenai, Kasilof and Anchor Point Sections.

These new regulations required drifters to fish more often in coastal waters closer to the Kenai and Kasilof rivers. When commercial fishermen pursue sockeye closer to their "home" drainages, the offshore salmon migrating north, like coho, have a better chance of reaching their spawning grounds. Targeting sockeye in more discrete near-shore harvest zones is also how Bristol Bay, the world's most famous salmon fishery has been managed for decades. The conservation corridor seeks to emulate that successful model in upper Cook Inlet.

- The conservation corridor was adopted by the 2011 Board and revised in 2014 by unanimous 7-0 vote. Six years of data are available on corridor effectiveness.
- 2014 was the first time in several years that regulations significantly enforced the longstanding intent of the management plan by providing a meaningful conservation corridor for coho and other salmon to swim north.
- Since the corridor was adopted, the drift net fishery has enjoyed some of its most successful seasons in the last 20 years (Figure 11).
- The Expanded Kenai and Kasilof Sections have proven successful for harvesting sockeye. Substantial numbers have been harvested in the terminal harvest zones in every year (Figure 18).
- The corridor restriction has reduced commercial harvest of coho, consistent with a long-standing sport-fishery priority for this species.
- Total exploitation rates on Susitna sockeye by the commercial fishery have been significantly reduced since current conservation corridor adopted in 2014 (Figure 8).¹
- Sockeye catch per delivery is reduced in the terminal harvest zone relative to wider openings. Therefore, more fishing time in terminal harvest zones is needed to make up the difference.

¹ Genetic studies do not appear to show a difference in sockeye stock composition inside and outside the expanded terminal harvest area, but the statistical power to identify differences from the offshore test fishery is limited by small samples sizes. Fishery openers are not designed for the purpose of testing for stock differences.

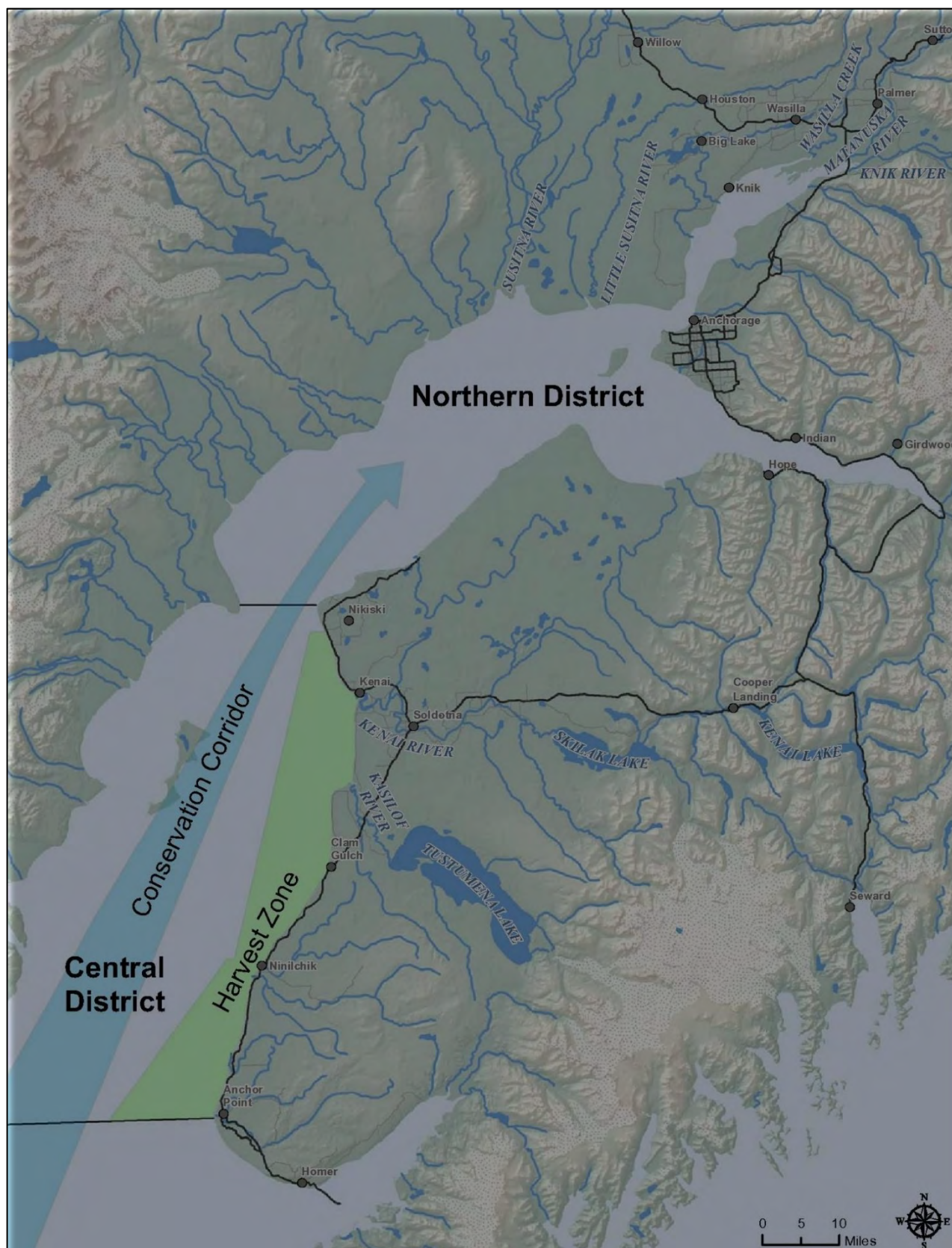


Figure 16. Location of conservation corridor and expanded terminal harvest zone in the Central District commercial drift gillnet fishery.

Coho Benefits

- The conservation corridor has proven very effective for reducing coho harvest in the commercial drift gillnet fishery.
- Coho catch per delivery is very low in the expanded drift terminal harvest area relative to more-district-wide openers. Sockeye to coho catch ratios in the expanded terminal harvest area are almost double those seen in district-wide openers during the last three weeks of July.
- As a result, many more sockeye can be caught per incidental coho taken in the expanded Kenai and Kasilof sections than in more district-wide openers.
- Substantial improvements in coho returns to northern inlet streams followed refinements in the conservation corridor regulation by the 2014 Board of Fisheries.

Table 4. Central District commercial drift gill net fishery harvest of coho by fishing area (season totals).

Year	Districtwide ^a	Kasilof section	Kasilof terminal	Expanded Kenai/Kasilof	
	Number	Number	Number	Number	% of total
2011	33,201	8	0	7,170	17%
2012	66,884	0	0	7,002	9%
2013	170,480	27	49	11,320	6%
2014	60,821	13	22	13,698	18%
2015	96,803	13	311	28,019	22%
2016 ^b	59,000	4	na	18,000	23%

^a Includes district wide and combined districtwide/expanded section openers.

^b Numbers for 2016 are approximate.

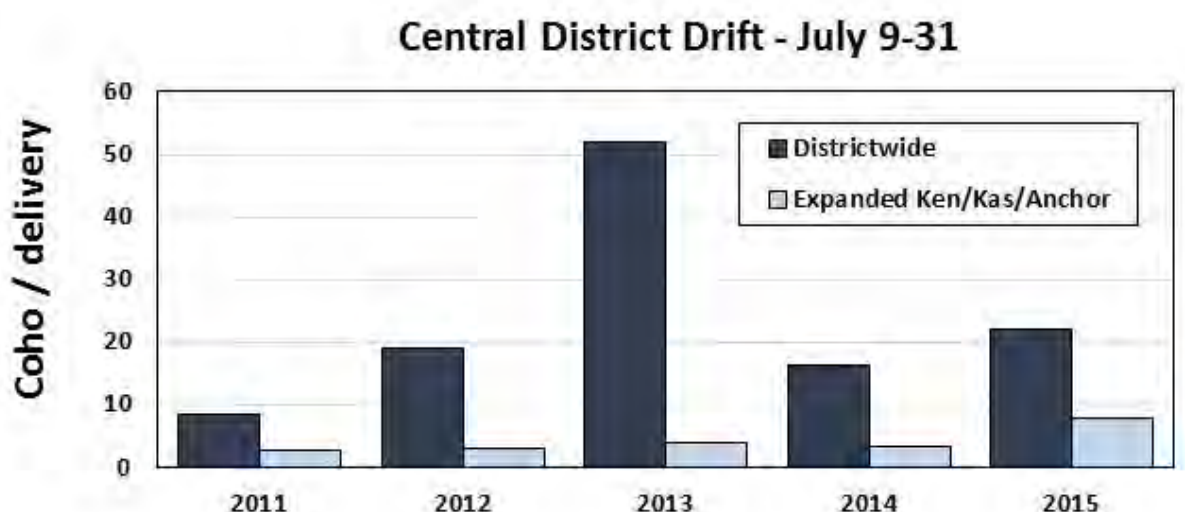


Figure 17. Effects of drift gillnet fishery area on coho harvest per delivery following adoption of conservation corridor regulations.

Sockeye Tradeoffs

- Six years of data clearly demonstrates that large numbers of sockeye can be caught in the Expanded Kenai and Kasilof Sections where fishing is focused while the conservation corridor protects northern-bound sockeye and coho moving up the center of the inlet.
- However, the commercial fishery typically has to work a little harder to catch their sockeye – sockeye catch per delivery is less in the terminal harvest areas than in larger areas of the district.
- The difference can be made up with more frequent openers of the Expanded Kenai and Kasilof Sections.
- However, commercial fishery managers have historically been reticent to decouple drift gillnet and set gillnet openers due to allocation objections by the commercial setnet fishery.

Table 5. Central District commercial drift gill net fishery harvest of sockeye by fishing area (season totals).

Year	Districtwide ^a	Kasilof section	Kasilof terminal	Expanded Kenai/Kasilof	
	Number	Number	Number	Number	% of total
2011	2,262,108	8,808	0	930,119	29%
2012	2,337,161	176	0	586,803	25%
2013	1,313,908	12,634	2,995	333,012	20%
2014	1,041,994	6,806	11,676	440,196	29%
2015	522,762	1,768	28,387	458,772	45%
2016 ^b	725,000	2,900	na	538,000	42%

^a Includes district wide and combined districtwide/expanded section openers.

^b Numbers for 2016 are approximate.

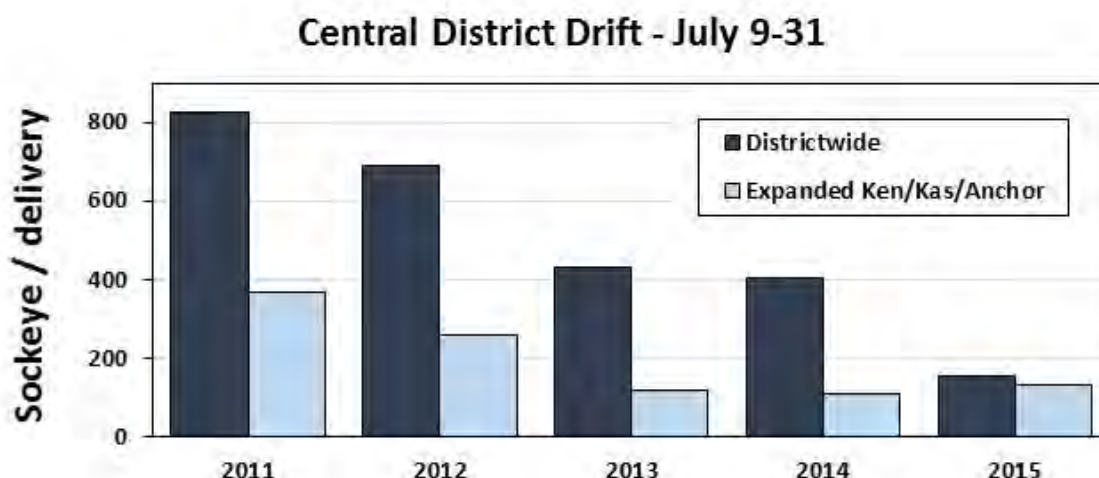


Figure 18. Effects of drift gillnet fishery area on sockeye harvest per delivery following adoption of conservation corridor regulations.

KINGS STILL A CONCERN

Improving Susitna numbers will provide us with the opportunity to consider the shape of future fisheries in the face of growing demand

Stocks of Concern

- King salmon return to large rivers and streams throughout Northern Cook Inlet.
- Escapement is monitored in 24 systems of which 17 have established escapement goals.
- Six populations were designated in 2011 as stocks of management (Alexander, Goose, Chuitna, Theodore and Lewis Rivers) or yield (Willow) concern (Figure 20).
- A seventh, Sheep Creek was designated as a stock of management concern in 2014.
- All Susitna River tributaries upstream from the Deshka River meet qualifications for stocks of yield concern but have not been designated. (No harvest has occurred in these stream for the last four years. Fishery closures are expected to continue in 2017.)
- ADF&G recommended no changes to king salmon Stocks of Concern in the 2016 BOF work session.

Abundance & Escapement

- Susitna basin streams support the largest king run in Cook Inlet and the fourth largest in the state – total returns exceed 100,000 in good years.
- Stock of Concern designations were precipitated by extremely poor escapement from 2008 through 2013.
- Small increases in 2015 and 2016 hold hope for continued improvement in abundance and escapement.
- It remains to be seen whether low numbers were temporary or portend an extended period of reduced abundance.

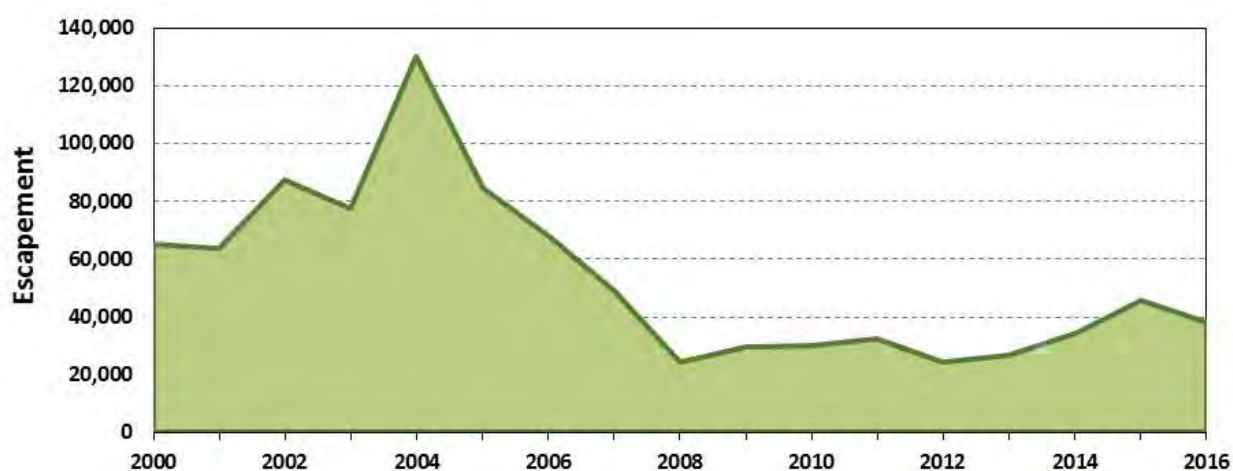


Figure 19. Escapement index for Northern Cook Inlet king salmon (total of index counts from 24 Susitna and Knik Arm streams).

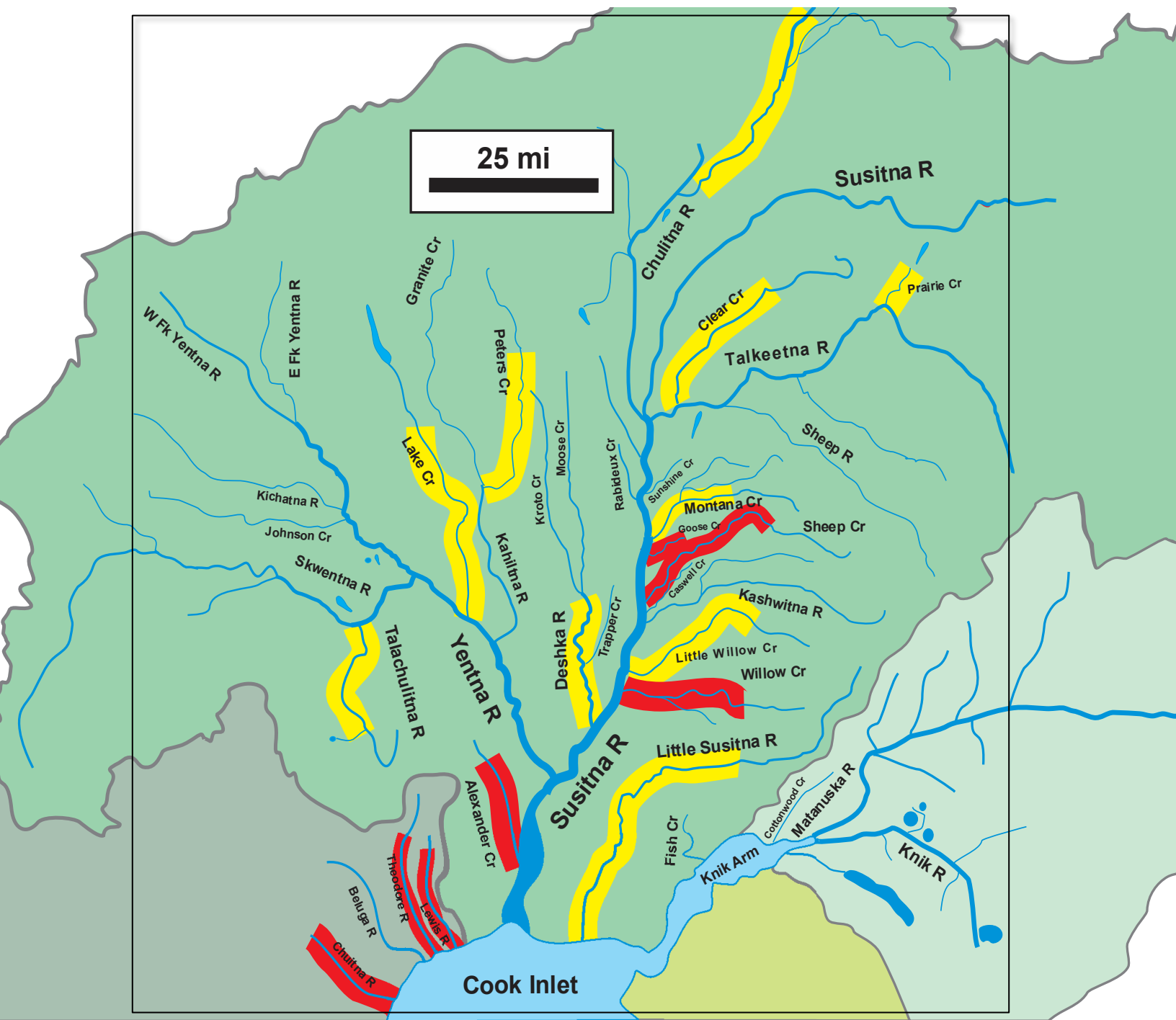


Figure 20. Index areas for Northern Cook Inlet King populations with established escapement goals. Stocks of Concern are identified in **red**. Other stocks with goals are identified in **yellow**.

PERSONAL USE FISHERIES – FOOD FOR ALASKANS

Over 30,000 households currently participate in the Cook Inlet personal use fishery on the Kenai Peninsula but opportunities are limited in Mat-Su waters

Personal use fisheries have a long and dynamic history in UCI but current fisheries were generally established in 1996. Since then popularity and participation have steadily increased. Over 30,000 household permits are now fished annually with a peak effort of 43,799 household-days in 2013. Harvest has averaged 97% sockeye with small numbers of other salmon species. Combined harvest of sockeye reached a record 630,400 in 2011.

Personal use fisheries for salmon are open to Alaska residents and occur in portions of the Kenai River, Kasilof River, Fish Creek, and the Beluga River. Most participants in the Kenai and Kasilof personal use fisheries come from areas outside the Kenai Peninsula including the Mat-Su as other regional personal use opportunities are quite limited. The only personal use fishing opportunity available within the Mat-Su Borough is located at Fish Creek, outlet to the Big Lake drainage. The Fish Creek fishery opens only occasionally. The Beluga River fishery is very small.

The intent behind personal use salmon fisheries is spelled out in 5 AAC 77.001 of Alaska codified fishery regulations. In summary, the intent acknowledges that implementation of the state's subsistence law changed things in a manner that excludes a large number of individuals from efficiently harvesting fish for their personal use. In recognition, the regulation states that "it is necessary to establish a fishery classified as personal use."

Myth: *Personal Use Fisheries are Out of Control*

Fact: *Growth in the UCI personal use fisheries over the last two decades attests to the tremendous value placed by Alaskan families on the opportunity to harvest salmon for their tables*

The UCI personal use fishery is the largest resident only fishery in Alaska, and puts more fish in more freezers of Alaskans than any other state fishery. The popularity of the personal use fishery has led to growing pains while access and infrastructure to the limited fishing area have struggled to catch up. However, the economic value and activity generated by the fishery easily justify and support significant investments in the facilities and systems needed for effective regulation and management.

Many criticisms of the personal use fishery are self-serving. Commercial interests see personal use as a direct competitor for harvestable surpluses of sockeye, a reduction in the local consumer market, and an effective management tool for regulating sockeye escapement. However, Alaska residents are voting with their feet and their wallets. The growth of this fishery clearly demonstrates the high value placed on the opportunity for Alaskans to harvest salmon for their tables.

THE MAT-SU IS LOOKING AFTER FISH HABITAT

The Matanuska-Susitna Borough and its many partners are aggressively working to ensure the continuing health of its watersheds, wetlands, streams and waters

Northern Cook Inlet waters support one of the most diverse salmon ecosystems on the planet. The vast and varied landscape and topography of the Mat-Su Basin supports a tremendous variety of fish habitat. Salmon return to practically every accessible niche and water body including over 700 Mat-Su Basin rivers, streams and creeks totaling over 4,000 miles and spread across more than 25,000 square miles. The vast majority of this region is practically pristine.

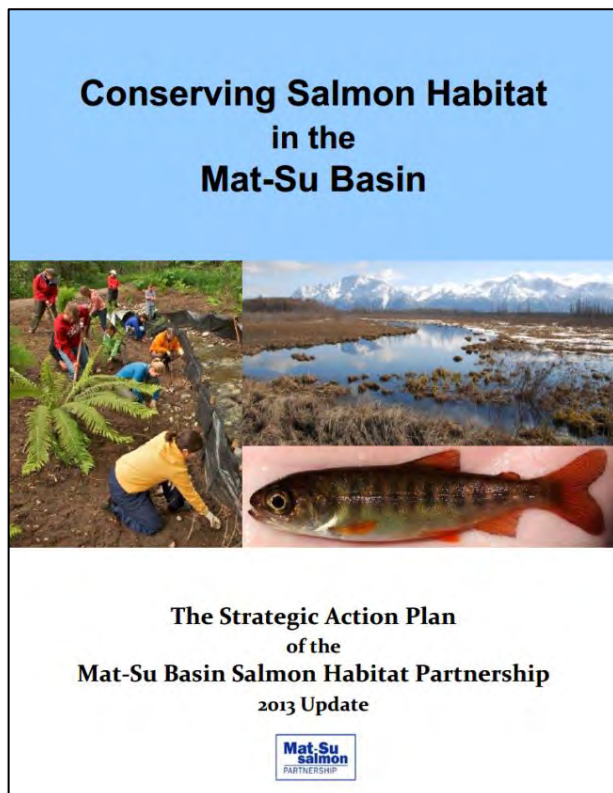
The Matanuska-Susitna Borough (MSB) and its many partners are aggressively working to ensure the continuing health of its watersheds, wetlands, streams and waters. These efforts involve research, conservation, restoration and education projects. A few examples of this work are summarized below.

Partnerships

Concern over habitat impacts from population growth and development led ADF&G, the U.S. Fish and Wildlife Service (USFWS), The Nature Conservancy (TNC), the MSB and other agencies in 2005 to establish the Matanuska-Susitna Basin Salmon Habitat Partnership. Since its inception, the Partnership has brought together a diverse group of over 60 members representing businesses, governments, landowners, Native Alaskans, and the non-profit conservation community.

Since 2006, the partnership has funded and supported nearly 80 on-the-ground assessment, restoration, protection, and education projects. Salmon habitat activities are guided by goals and priorities identified in a strategic action plan most recently updated in 2013.

Work has included educational programs, fish passage improvements, lakeshore restoration, wetlands protection and recreational access. The partnership also supports an annual forum to exchange information and ideas about salmon and their habitat in the Mat-Su Basin.



Research & Science

FWC Fish Research Plan – developed by the MSB with agencies and community groups to prioritize research needs for UCI. This was the first time a comprehensive fish research plan has ever been done for UCI. Eleven research projects are now underway. This work was funded with a state grant awarded to the MSB in 2013 (\$1.6m research, \$900K fish passage).

Stream Mapping – Nature Conservancy, USGS and partners remapped the Mat-Su. This project increased map accuracy by doubling the number of streams represented and brought maps up to national standards.



Stream temperatures – Several years of work has been conducted to map water temperature trends by Cook Inletkeeper and University of Alaska Anchorage to locate cold water refugia as summer stream temperatures increase.

Juvenile salmon distribution – Important summer rearing areas and overwintering areas are being identified through field surveys by USFWS and others.

Conservation

Knik Islands – A new conservation easement, at the upper end of Knik arm, was established to protect 4,800 acres of prime salmon habitat through Great Land Trust and the property owner Eklutna Inc., the tribal native corporation. This easement ensures continuing access for traditional subsistence activities and permitted public uses.

Anadromous Waters Catalog & Instream flow reservations – Field work to collect data for the catalog and water reservations are being done every year. In 2014 & 2015, six streams and 84 stream miles were added to the AWC and applications for “core area” streams were filed to ensure sufficient water for fish.

Restoration

Revegetation – ADF&G & USFWS have ongoing programs to restore streambanks and lake shores in the Mat-Su along with other partners. ADF&G provides a training workshop annually on revegetation techniques. Projects have been completed on Wasilla Lake, Big Lake, Cottonwood Creek tributaries (2500 feet of lake shores, 1000 feet of streambanks).



Figure 21. Fish passage culvert installed on Caswell Lake Road in 2014.

Fish Passage Projects—ADF&G, MSB and USFWS have been surveying and prioritizing culverts that block fish passage since 2001. MSB, USFWS and partners, working with road service areas, nonprofits, local, state and federal agencies, have replaced over 100 culverts since 2001 at an average cost per project of \$200,000. Over \$8 million in federal, state, local and private funds have been spent on culvert replacement to improve fish passage and flood water management.

Fish Passage Ordinance – The MSB Assembly unanimously adopted an ordinance in 2013 establishing fish passage design standards for culverts on Borough roads. This means all culverts installed since then must allow for juvenile fish passage. This is the only such ordinance in the state.

Education

Mat-Su Salmon Habitat Partnership members continually reach out to the public to increase awareness of salmon life cycles and habitat needs through their two-day Salmon Science Symposium, stream signage “Baby Salmon Live Here,” project site tours and more.



Figure 22. ADF&G Spring Creek salmon education class with local school children.

MATANUSKA-SUSITNA BOROUGH FISH & WILDLIFE COMMISSION PROPOSALS

PROPOSAL 213 – Paired Northern District Commercial & Sport Restrictions

5 AAC 21.358. Northern District Salmon Management Plan

Close commercial fishing within one mile of Little Susitna River when the Little Susitna River sport fishery is restricted to no bait, as follows:

Amend section (d) of the Northern District Salmon Management Plan by adding a new provision:

- (3) when the Little Susitna River sport fishery is closed to use of bait, commercial fishing shall be closed within one mile of the Little Susitna River confluence with Knik Arm.**

What is the issue you would like the board to address and why?

Although the Northern District Salmon Management specifies that:

The Department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of in river restrictions, the Little Susitna River sport fishery is restricted to artificial lures only from October 1 - August 5 as a conservation measure to ensure adequate escapement of king salmon, coho salmon, and in river species.

At the same time, commercial fishing is allowed to within 500 yards of the Little Susitna River confluence with Knik Arm. While the sport fishery is restricted by a bait closure for most of the season, the commercial fishery enjoys a more liberal harvest opportunity than exists around the confluences of most other significant Upper Cook Inlet salmon streams.

This occurs despite the fact that ADF&G only manages for abundance of king salmon and coho salmon in the Little Susitna River, with no established goals for other salmon species, and with annual sockeye salmon weir counts of less than 1,600 sockeye per year in 2013, 2014, and 2015.

Liberal commercial fishing near the Little Susitna River confluence with Knik Arm should not cause or contribute to restriction of the sport king salmon and sport coho salmon fisheries, which according to management plans, are to be managed to provide sport and guided sport fishermen a reasonable opportunity to harvest salmon resources. Liberal commercial harvest opportunity near the Little Susitna River confluence should also not contribute to depressed Little Susitna River sockeye salmon escapements.





PROPOSAL 214 – Paired Northern District Commercial & Sport Restrictions

5 AAC 21.366. Northern District King Salmon Management Plan.

Close commercial fishing within one mile of the Little Susitna River when more than half of Northern District streams with king salmon escapement goals are closed to sport harvest of king salmon or when the Little Susitna River sport fishery is restricted by emergency order, as follows:

Amend the Northern District King Salmon Management Plan by adding the following provisions:

- (12) if more than half of the Northern District streams with king salmon escapement goals are closed to king salmon sport harvest; the commissioner shall close by emergency order, the Northern District commercial set net fishery until the first regular period after June 24.**
- (13) if the Little Susitna River sport fishery is restricted by emergency order: the commissioner shall close, by emergency order, commercial fishing within one mile of the Little Susitna River confluence with Knik Arm.**

What is the issue you would like the board to address and why?

The purpose of this plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions.

During times of king salmon shortages in 2013, 2014 and 2015, the Commission discovered the above preamble language within the Northern District King Salmon Management Plan did not adequately address how ADF&G shall manage the commercial fishery at times when:

- #1. More than half of the Northern District streams with ADF&G established king salmon escapement goals were closed to king salmon sport harvest for the entire year, yet the Northern District commercial fishery was allowed to continue harvesting kings salmon bound for all drainages, and all emergency restrictions to the Northern District king salmon fishery were removed whenever bait fishing was allowed in the Deshka River.
- #2. The Little Susitna River sport fishery was restricted by emergency regulation but the commercial fishery was allowed to continue harvesting king salmon within a mile of the Little Susitna River confluence with Knik Arm. When the Little Susitna River sport fishery is restricted, why does the commercial fishery retain a liberal harvest opportunity on the same stock that the management plan stipulates be managed primarily for sport and guided sport uses?



PROPOSAL 220 – Larsen Creek Mouth Closure

5 AAC 61.120. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 5 of the Susitna River Drainage Area.

Establish sport fishery closure times in the Larsen Creek drainage, as follows:

Larsen Creek including all waters within a 1/4 mile radius of its confluence with the Talkeetna River closed to fishing from 11:00 pm to 6:00 am from July 1 to August 15.

What is the issue you would like the board to address and why?

Establish a more organized fishery at the confluence of Larsen Creek and the Talkeetna River. Susitna River drainage sockeye salmon are currently designated as a Stock of Yield Concern. Larsen Creek is one of three indicator/ index lakes used to assess sockeye production in the Susitna Valley. Larsen Lake is the only monitored and index lake used by ADF&G to assess the sockeye production and spawning success on the main stream of the Susitna River. It has barely made escapement goals in the last five years and has had to be closed twice during that time due to low escapement numbers early on.

The area where people fish is a concentrated area at the confluence of the Talkeetna River and Larsen creek. Access into the mouth of Larson Creek and the Talkeetna river confluence can be crowded with people wading shoulder to shoulder in the creek making fish passage difficult.

Rod and reel fishermen who would normally fish till 11:00 pm then sleep at the creek and fish at 1:00 am will be less likely to spend the night. Guides will still arrive at 6: 00 am to bring their clients through. This may intensify fishing during that period of the day, but it would allow a reprieve during the night for escapement.



PROPOSAL 230 - Deshka River King Salmon Management Plan

5 AAC 61.XXX.

Create a Deshka River King Salmon Management Plan, as follows:

The purpose of this plan is to direct the Department to manage the Deshka River sport king salmon fishery to attain spawning escapements within the SEG range of 13,000 - 28,000 fish, while encouraging adaptive management to attain the escapement objective in a manner which avoids inseason closures and restrictions when possible, and thereby maximizes benefit as much as practical. If the Department's annual Deshka River king salmon outlook calls for a total return of less than 21,000 king salmon, then effective starting May 16, the Department may use, in preferential order, one or more of the following tools to precautionarily increase king salmon escapement through the sport fishery: restrict anglers to use of one single hook only, restrict the fishery to use of artificial lures only, restrict harvest to one bag limit per day (either personal or proxy, but not both), reduce the number of days per week king salmon may be harvested.

Once the Department can project a king salmon escapement of 17,000 king salmon past the Deshka River Weir or when 13,000 king salmon have swum past the weir (whichever comes first), the Department may return the fishery to normal fishing regulations the following day.

The commissioner may depart from the provisions of the management plan under this section as provided in 5AAC 21.363(e).

What is the issue you would like the board to address and why?

For five consecutive years (starting in 2012) the Deshka River sport king salmon fishery has been managed by preseason emergency orders setting the regulations to be used at the start of each season. From discussions by the Commission with the ADF&G, it has come to our attention the Department seems to have no clear plan as to when and what emergency regulations may be appropriate at specific projected king salmon return levels. This creates several additional problems, a significant one of which is for the past five years regulations published in the Southcentral Alaska Sport Fishing Regulations Summary have been inconsistent with preseason emergency regulations issued by the Department. Every time this occurs the Department must spend considerable time and money (consequentially) to publicize these changes. We believe sport anglers may be better served with a Deshka River king salmon management plan printed in the regulations book, and clarifying what anglers might expect under specific king salmon outlook and return levels. This is even more appropriate during these times of state financial downturn.

In addition, when the fishery is managed by emergency regulation there is no clear way for the public to weigh in on an ineffective emergency regulation or propose a regulation change, since all emergency orders expire after 90 days. For example, for the past two years ADF&G has been implementing emergency Little Susitna River and Susitna River drainage king salmon regulations starting May 1, but since there is no significant king salmon harvest until after May 15, the

primary result of implementation on May 1 is to minimize benefit for hardly any, and in some years, zero biological gain.

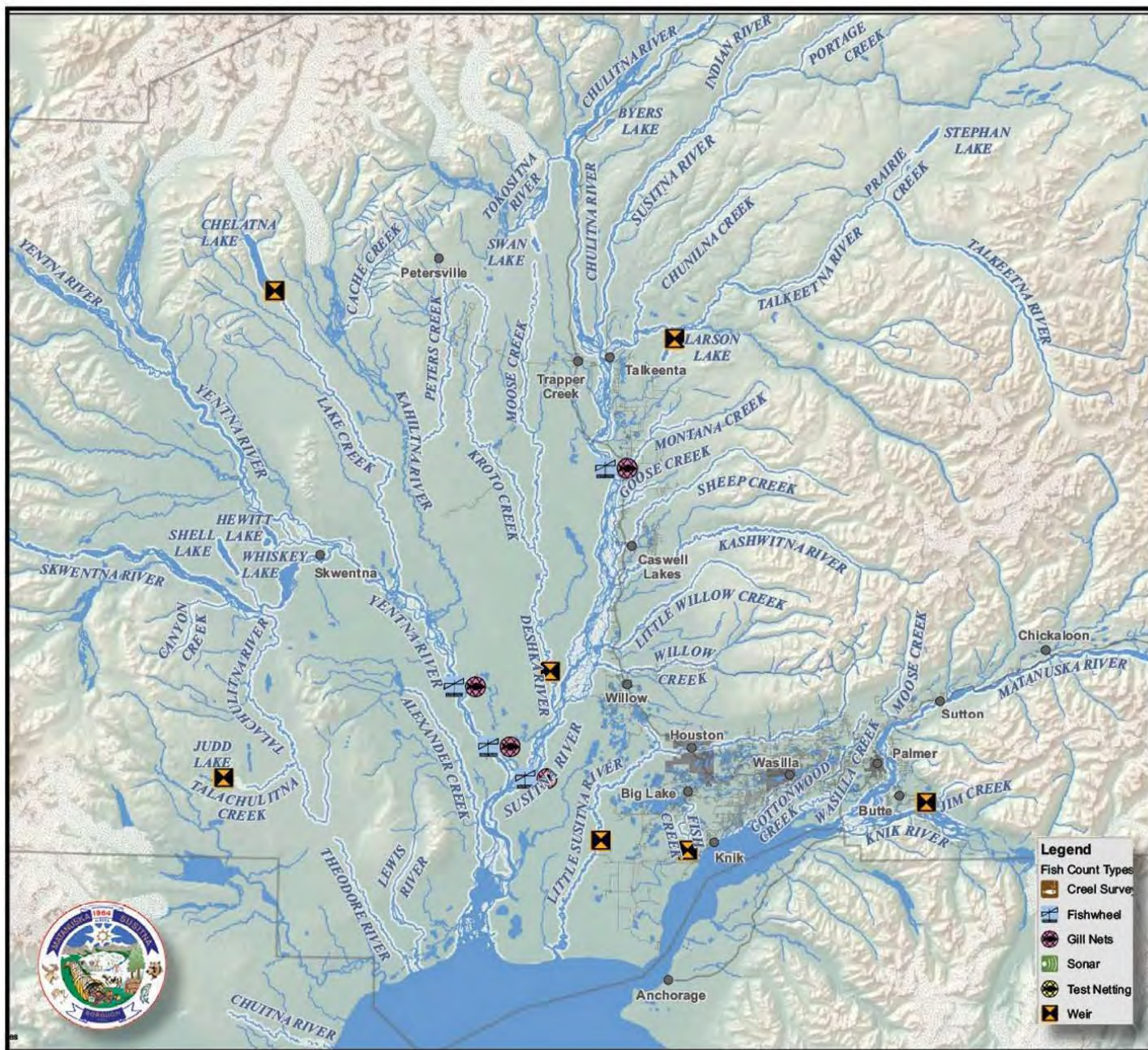
Another dubious emergency regulation is the reduction in annual king salmon limit from five to two fish throughout the Susitna River drainage and Little Susitna River combined. On the Deshka River and Little Susitna River, in particular, there is enough angling effort that a reduction in annual bag limit likely has little positive affect on king salmon escapement — especially considering that many Alaskans simply take up proxy fishing to sidestep a decreased annual limit. In these times of state economic hardship wouldn't it be more cost effective if the Department simply kept the annual limit at five king salmon and, thereby, reduced the need for proxy permits and proxy fishing? During times of king salmon shortage, wouldn't king salmon escapements be more positively increased by restricting daily harvest to one bag limit (either personal or proxy, but not both)?



REFERENCES

- Tobias, T. M., and M. T. Willette. 2013. An Estimate of Total Run of Sockeye Salmon to Upper Cook Inlet, Alaska, 1976-2008. Alaska Department of Fish and Game, Divisions of Sport Fish and Commercial Fisheries.
- Oslund, S., Ivey, S. S. and D. Lescanec. 2013. Area Management Report for the Recreational Fisheries of Northern Cook Inlet, 2011-2012. Alaska Department of Fish and Game, Division of Sport Fish. Fishery Management Report No. 13-50.
- Barclay, A. W., C. Habicht, W. D. Templin, H. A. Hoyt, T. Tobias, and T. M. Willette. 2010. Genetic stock identification of Upper Cook Inlet sockeye salmon harvest, 2005-2008. Alaska Department of Fish and Game, Fishery Manuscript No. 10-10, Anchorage.
- Colt & Schwoerer. 2009. Economic importance of sportfishing in the Matanuska-Sustina Borough. University of Alaska Report to the Borough Economic Development Department.
- Dunker, K. 2013. Upper Cook Inlet personal use salmon fisheries, 2010-2012. Alaska Department of Fish and Game Fishery Data Series Report 13-59.
- Fair, L. F., Willette, M. T. and Erickson, J. W. 2013. Review of Salmon Escapement Goals in Upper Cook Inlet, Alaska, 2014. Alaska Department of Fish and Game, Divisions of Sport Fish and Commercial Fisheries. (Fishery Manuscript Series No. 13-13).
- Knapp, G. 2009. Comparison of recent sport and commercial fisheries economic studies. Cook Inlet Salmon Task Force.
http://www.iser.uaa.alaska.edu/iser/people/Knapp/pubs/Knapp_Sport_Commercial_Economic_Comparison_for_Task_Force_090129_revised.pdf
- Southwick Associates et al. 2008. Economic impacts and contributions of sportfishing in Alaska. Alaska Department of Fish and Game professional publication 08-01.
<http://www.sf.ADFG.state.ak.us/Static/economics/PDFs/pp08-01e.pdf>.
- Shields, P., and A. Dupuis. 2016. Upper Cook Inlet Commercial Fisheries annual Management Report, 2015. Alaska Department of Fish and Game Fishery Management Report 16-14.
- Shields, P., and M. Willette. 2009. Migratory timing and abundance estimates of sockeye salmon into Upper Cook Inlet, Alaska, 2008. Alaska Department of Fish and Game, Fishery Data Series No. 09-59, Anchorage.

Matanuska-Susitna Basin



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February 2, 2017

Alaska Board of Fisheries
ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

ATTN: Board of Fisheries Comments for Upper Cook Inlet Finfish Meeting

Dear Board of Fisheries members:

The Matanuska-Susitna Basin Salmon Habitat Partnership has been working to protect salmon habitat in the Mat-Su Basin for over 10 years. Guided by a strategic action plan, we do this by protecting the healthy habitat that occurs throughout the Mat-Su, restoring degraded habitat in the more developed areas, and preventing habitat degradation in ongoing development in the Mat-Su by improving our scientific knowledge of salmon and their habitat, and by providing a platform for collaboration and information sharing.

Management of Alaska's fisheries is respected around the world. We appreciate the crucial and challenging role the Board plays in this successful management model, and hope that knowing more about the Partnership will be helpful for the Board's consideration of Cook Inlet fisheries management policies.

The future of Mat-Su salmon depends upon what happens to them during each life stage, from their incubation and rearing in freshwater, to their maturation in saltwater, and during their return back to freshwater to spawn. While debate continues about the reasons for decline of some salmon stocks across Alaska and in the Mat-Su, it is well-known that freshwater habitat loss and fragmentation have been some of the primary drivers in the decline of anadromous fish in the U.S. and the world. Our goal is to ensure that Mat-Su salmon have healthy habitats in the Mat-Su and upper Cook Inlet so that habitat loss does not contribute to the other stresses that Mat-Su salmon must endure. In the Mat-Su, our top priority is to protect and maintain healthy habitat wherever possible.

The attached report "Matanuska-Susitna Basin Salmon Habitat Partnership: Healthy Salmon/Healthy Communities 2014-2015" describes progress of the Partnership in the areas of collaboration and information sharing, conservation, restoration and science for



the past two years. There are over 60 partners from business, non-profit, tribal and agency organizations who make this work possible.

Since 2006, the Partnership has funded a total of 78 salmon and salmon habitat related projects in the Mat-Su through the National Fish Habitat Partnership. This includes 32 science, 22 restoration, 12 conservation and 12 education/coordination projects totaling nearly \$700,000 in direct funds with millions more in matching funds and volunteer contributions from private and public sources. This year, the Partnership anticipates funding multiple salmon habitat projects that include improving fish passage, eradication of pike, conservation of priority salmon habitat and quantifying wetland loss in Mat-Su's most populated areas.

We welcome any questions or requests for information that the Board of Fisheries may find helpful in its work toward maintaining sustainable fisheries into the future for all Alaskans, and thank you for your recognition of habitat as a critical foundation. If you have any questions for the Partnership about habitat issues in the Mat-Su, please feel welcome to get in touch.

On behalf of the Mat-Su Salmon Partnership,

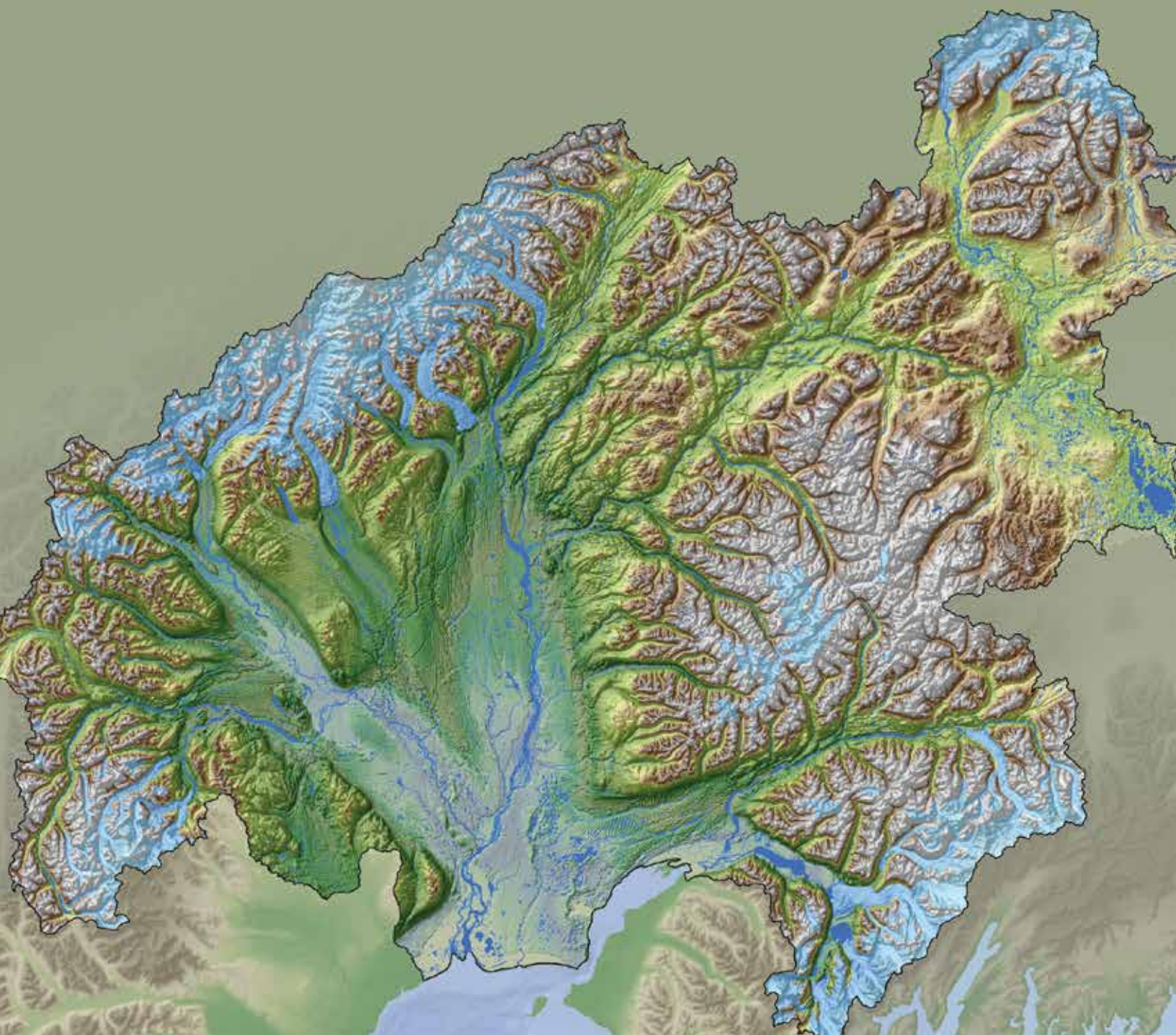
A handwritten signature in black ink, appearing to read "Jessica Speed".

Jessica Speed
Mat-Su Basin Salmon Habitat Partnership Coordinator
jsspeed@tnc.org
907-865-5713



MATANUSKA-SUSITNA BASIN SALMON HABITAT PARTNERSHIP

Healthy Salmon / Healthy Communities
2014–2015



Mat-Su salmon

PARTNERSHIP



Three happy girls after a day of fishing on the Little Susitna River. *Patty Sullivan/Mat-Su Borough*

On the cover: The Matanuska and Susitna watersheds, covering nearly 25,000 square miles and near in size to the state of West Virginia. Recent updated stream maps doubled the number of mapped stream miles to a total of over 50,000 miles.

James DePasquale/The Nature Conservancy

Dear Salmon Friends,

There are few places in the world where salmon still run up the rivers and feed communities; Mat-Su is one of them. From the fishermen who make a living catching salmon, to guides who take anglers up the rivers and residents who fish to put food in their freezers, salmon are an essential part of our lives.

Mat-Su Basin Salmon Habitat Partnership (the Partnership) members believe that thriving fish, healthy habitats, and vibrant communities can co-exist in the Mat-Su. We've been busy these past two years protecting and restoring salmon habitat through science, conservation, restoration and outreach projects. This report highlights just a few of the projects and collective achievements in 2014–2015.



Partnership Coordinator Jessica Speed (far left) and Partnership Steering Committee members Corinne Smith/The Nature Conservancy, Bill Rice/ U.S. Fish & Wildlife Service, Frankie Barker/Mat-Su Borough and Christy Cincotta/Tyonek Tribal Conservation District.

Thanks to the National Fish Habitat Partnership, the Partnership was able to award grants to local and regional organizations totaling \$258,000 in 2014 and \$236,000 in 2015 for 17 projects focused on conserving or restoring salmon habitat or improving knowledge about Mat-Su salmon and their habitat.

Our annual Mat-Su Salmon Science and Conservation Symposiums, held in November every year, continue to be our premier outreach event and annual general meeting for the Partnership. A new endeavor last summer took community leaders on a

summer site tour of partner projects around Big Lake and Shell Lake, giving exposure to what partners are doing and why it matters.

The Partnership has several conservation priorities going forward. A main focus continues to be improving our knowledge of the location and presence of salmon in streams to provide essential information for protecting key existing habitat. In addition, as development continues, the Partnership is concerned about the alteration of riparian areas along lakes, streams and rivers; the filling of wetlands; and culverts that block fish passage. The latter is an ongoing priority that has seen many successful efforts over the years.

It takes all of us to keep our salmon habitat healthy. Please contact us if you want to know how you can help protect salmon in the Mat-Su.

Sincerely,

Mat-Su Basin Salmon Habitat Partnership Steering Committee and Coordinator

PARTNERSHIP

The Mat-Su Basin Salmon Habitat Partnership formed ten years ago to address increasing impacts from human use and development on salmon habitat in the Mat-Su. With the Partnership's existence came an opportunity to leverage past efforts and catalyze diverse interests around salmon and the conservation of their habitat. Today the Partnership is a diverse and dedicated group of over 60 organizations and individuals who are proactively addressing salmon habitat issues in the Mat-Su Basin. From the beginning, the Partnership has been united by a common vision where thriving fish, healthy habitats, and vibrant communities co-exist. An important role, and one we pride ourselves on, is bringing people together to gain and share knowledge, resources, and a vibrant appreciation for salmon.

day, over 30 oral and poster presenters, a 9-person planning committee, over 25 volunteers, and dozens of supporters, it is unquestionably a partnership event that embodies a spirit of cooperation and collaboration. Each year the Symposium continues to evolve and mature. These past two years have brought a record turnout of 140 people in a day, college and high school student participation, greater general public and local business involvement, and incredible keynote speakers. Perhaps its greatest asset, the Symposium provides a friendly forum where a range of ideas, collaborations and a diversity of views can be shared. We are looking forward to further involvement of the general public and broader community in future years.

Partnership Summer Site Tour

In August 2015, the Partnership and Cook Inlet Aquaculture Association hosted a first annual tour of partnership projects for community leaders. The goal of the event was to introduce the Partnership and the range of work undertaken by partners to a broader public audience. It was a great opportunity for all of us—participants, presenters and organizers—to get to know each other, learn more about Mat-Su salmon and their habitat, as well as the great efforts to maintain our wild salmon resources in the Mat-Su. We are so grateful to everyone who took the time to attend, demonstrating their commitment to keeping wild abundant salmon in the Mat-Su! Please stay tuned for details about our 2016 site tour.



2015 Mat-Su Salmon Symposium in Palmer. Please consider joining us at this fun annual event—everyone is welcome.

Annual Mat-Su Salmon Science and Conservation Symposium

The Symposium is the most diverse gathering of its kind in the Mat-Su, bringing together a broad range of people to share information and exchange ideas about salmon science and conservation. Presentations span a wide range of topics from the economic value of salmon to prioritizing efforts for strategic conservation. With near 100 people attending each

Wildlife Wednesdays

In 2015 The Mat-Su Salmon Partnership partnered with the Alaska Department of Fish and Game (ADF&G), Alaskans for Palmer Hayflats and The Nature Conservancy on a monthly lecture series about local fish and wildlife resources at Mat-Su College called Wildlife Wednesdays.

Here are just a few of the creative outreach and education initiatives partners are offering:

Clean Boating Cook Inletkeeper's clean boating campaign addresses hydrocarbon pollution in Mat-Su waters.

Baby Salmon Live Here signs around the valley highlight that baby salmon do live here year round and need us to play a role. Get in touch with Great Land Trust if you want to sponsor a sign!

Septic Smart Mat-Su Conservation Services coordinates and educates about cost share pumping of septic tanks and potential impacts to nearby waterbodies.



Kingmakers Great Land Trust's Kingmakers initiative celebrates exceptional efforts of individuals for salmon.

Mike Gracz of Kenai Watershed Forum is crowned a King Maker by Kim Sollien of Great Land Trust for all the work he has done to map wetlands important to salmon.

Salmon in the Classroom Alaska Department of Fish and Game helps kids learn about the salmon lifecycle by nurturing salmon eggs to fry in the classroom.

Susitna Salmon Center in Talkeetna Aquatic Restoration and Research Institute has created a new home grown salmon education center, art gallery and gift shop.



Partnership site tour at Shell Lake. Gary Fandrei /Cook Inlet Aquaculture Association

17 With funding from the National Fish Habitat Partnership, the Partnership has provided nearly \$500,000 for 17 salmon habitat projects in the Mat-Su in 2014 & 2015, with over 4 million dollars in direct match and leveraged funds from private and public sources.

72 The Mat-Su Salmon Partnership has funded 72 projects in the Mat-Su Basin since 2006.



Welcome to our 6 New Partners in 2014/15

- Alaska Trails (Non-profit)
- Knik Tribal Conservation District (Tribal)
- Mat-Su Trails and Parks Foundation (Non-profit)
- Sustainable Design Group (Business)
- 2 private individuals—Eagle River & Sutton residents



From an economic perspective, wild salmon may be the world's most perfect business model: Nature provides the necessary infrastructure, we invest nothing in the wild production system, and every year we harvest an enormously valuable resource.

— Richard Nelson, Keynote speaker at the 2015 Mat-Su Salmon Science and Conservation Symposium

SCIENCE

In the Mat-Su, as in much of Alaska, we are still lacking in some of the basic foundational science needed to inform strategic habitat conservation. Filling in those knowledge gaps has been a priority. In the last two years we have made some great strides in these foundational areas:

Mapping streams to national standards

In December of 2015 The Nature Conservancy and partners completed an update to the U.S. Geological Survey (USGS) National Hydrographic Database. This doubled the number of mapped streams in the Mat-Su Basin, increased the accuracy of stream maps, and brought them up to national standards. Having the many smaller tributary streams in which juvenile salmon mature before swimming to the sea now mapped accurately for the first time, will help us all make salmon-friendly decisions about how to manage and develop our lands and waters. The utility of this publicly-available dataset goes beyond salmon to potentially include enhanced flood preparedness, emergency response, and community and development planning. For the Partnership, it improves our ability to effectively participate in the national fish habitat assessment looking at the status of fish habitat across the nation and helps partners prioritize fish passage restoration efforts.

Increasing knowledge of juvenile salmon

Partners have continued to increase our knowledge of juvenile salmon distribution, abundance and important areas for summer rearing and overwintering over the last few years. For example, Aquatic Restoration and Research Institute scientists discovered greater use of the mainstem Susitna River by juvenile salmon. Fisheries biologists from the U.S. Fish and Wildlife Service (USFWS) have found that although widespread in summer in tributaries and mainstem rivers, juvenile coho salmon in the Big Lake drainage have just a handful of key overwintering areas. Knowing how juvenile salmon are using habitat throughout the year, and what areas are most important for them is critical information for making informed decisions regarding development and where to spend limited fish passage restoration dollars to improve access to key habitats.



Left: Using a minnow trap to document salmon presence. *Katrina Mueller/USFWS*
Above Top: Trapping juvenile salmon on Swiftwater Creek to understand how, where and when they use certain habitats. *Katrina Mueller/USFWS*
Above: Juvenile coho salmon from the Big Lake drainage. *Caroline Walls/USFWS*



The Mat-Su is the fastest growing area in the state by a large margin. How do you conserve habitat if you don't know where it is? You have to identify where your streams are and that's what the new stream mapping does for the Mat-Su.

– Larry Engel, retired Alaska Department of Fish and Game and member of the Mat-Su Borough Fish and Wildlife Commission

Long-term stream temperature monitoring and identification of cold water refugia

Scientists agree that, in general, when water temperatures exceed 17°C (~62°F) salmon suffer negative effects. Prolonged exposure to high temperatures can even result in death. Cook Inletkeeper (CIK) and partners are maintaining a network of stream temperature monitoring sites to track long-term patterns across the Mat-Su basin. In addition, CIK and U.S. Fish and Wildlife Service are identifying cold water refugia—areas that will remain coolest in a warming climate and therefore provide important habitat to support salmon resiliency. This knowledge is directly informing land trusts as they work to conserve important lands today and into the future.

Building on their work in Mat-Su, CIK, and University of Alaska Anchorage also established minimum standards for water temperature data collection for Alaska. Acquiring more comparable data across the state will aid in understanding current and future regional temperature trends in Alaska's freshwater habitat.

Go to the AKOATS website!

<http://accs.uaa.alaska.edu/aquatic-ecology/akoats/>.

Index watersheds

In the last two years, the Partnership's Science and Data Committee started work to identify representative index watersheds. These areas will be used for focused study on salmon and their habitat, and to detect both change within these individual index watersheds, and across the basin as a whole over time.

Invasive species surveys

Several non-native invasive species like the aquatic invasive plant Elodea and predatory fish northern pike pose threats to salmon and their habitat. Partner organizations are including surveys in their field work for early detection of aquatic invasive species spread. *Read more in restoration section.

RESTORATION



Sockeye salmon struggling to move upstream through a road-stream crossing to spawning grounds. *Katrina Mueller/ USFWS*

The quality of salmon spawning, rearing, and overwintering habitat in the Mat-Su is closely linked to the level and location of human activity. Areas that overlap with more developed locations like the Palmer-Wasilla area are more degraded. Impacts are typically related to removal or alteration of native shoreline vegetation, degraded water quality, fish passage impediments and water flow changes.

Fish passage

Adult fish must be able to reach spawning areas and juvenile fish must be able to move both up and downstream to feed, find cover and overwinter: year-round, free passage is critical. Where roads cross streams, many culverts block or impede fish movements. A cost-benefit fish passage prioritization done in 2015 indicated that 290 barriers to fish passage remain in Mat-Su and likely prevent or limit salmon from reaching spawning or nursery grounds. Sixty-three of these barriers account for 75% of the total miles upstream of barriers. This information will help partners prioritize culverts for replacement opening up free passage for juvenile and adult salmon.

Aquatic invasives

Aquatic invasive species can have significant impacts on salmon and their habitat. Current threats to salmon in the Mat-Su are from water and shoreline plants Elodea and reed canarygrass, as well as the fish northern pike. The Partnership goal is to prevent further invasive introductions. The goals for the existing threats are:

- Eradication for Elodea, which was discovered in Alexander Lake in 2014. Treatment is planned for summer 2016 with partners performing detection surveys and educational outreach on the highest risk waterbodies.
- Containment for northern pike because they are much more widespread and well established than Elodea. Over 100 waterbodies in the Mat-Su have confirmed pike. Alexander Creek, which was formerly the home of a premier Chinook salmon fishery, is a focus area for ADF&G pike containment and localized eradication. Results have been positive and with each year of pike suppression, Chinook fry are being found farther up the stream system.
- Containment for reed canarygrass, which also is much more widespread. Partners have been mapping the extent of reed canarygrass and herbicide control is planned for in 2016.

14 barrier removals opened up 49.5 miles of upstream habitat and 857 acres of lakes.

11 shoreline restoration projects on public and private land through ADF&G/USFWS cost share program.

Stream bank restoration

In 2015, the Partnership identified maintenance of shoreline areas along lakes, streams and rivers as one of its top four conservation priorities. In the last two years the Mat-Su Valley Habitat Restoration and Protection Cost Share Program, administered cooperatively by ADF&G and USFWS completed 11 restoration projects on public and private land in the Mat-Su that conserved 2,500 feet of lake and streamside habitat along salmon streams; restored nearly 1,000 feet; and removed 670 feet of human-made structures that impacted salmon habitat.

Palmer Soil and Water Conservation District completed an assessment of riparian impacts on 35 priority waterbodies in the Mat-Su. Although some waterbodies like Big Lake, Blodgett Lake, and Cottonwood Creek had 27%, 12%, and 4% impacted shorelines respectively, the overall percentage of impacted shorelines remains relatively low. This underscores both the recognition there are areas of concern, and that there is a great opportunity in the Mat-Su to conserve riparian salmon habitats before they are impacted and financial resources expended in their restoration.



By connecting with local experts at annual Mat-Su Salmon Symposiums, we've been able to build relationships and increase our capacity to achieve our fish habitat restoration goals. Through these connections we've successfully opened over 20 miles of salmon habitat through culvert replacements since 2012.

– Christy Cincotta, Tyonek Tribal Conservation District



Restoring streambanks on Wasilla Creek. These vegetated shoreline areas provide cover for juvenile fish; cooler temperatures; have slower moving currents where weaker swimming fish can rest; and have over-hanging plants that fall into the water, creating food sources for aquatic insects that juvenile salmon eat. Photos: Frankie Barker/Mat-Su Borough and Jessica Speed/The Nature Conservancy



CONSERVATION

Katrina Mueller/USFWS

In the Mat-Su, there is still high quality, intact salmon habitat, and our top priority is to conserve and maintain that habitat—so salmon can successfully complete each life stage, from egg, alevin, fry, smolt to spawning adult. Strategically conserving healthy and intact salmon habitat has been one of the Partnership's greatest areas of success.

Important salmon habitat conserved

Since 2014, Great Land Trust and partners have conserved nearly 2,000 acres of priority estuaries, wetlands, riparian areas, and uplands important for salmon in perpetuity under conservation easements. Priority lands for conservation were identified in a parcel prioritization (started in 2009 and updated in 2014) that identified 1,000 parcels providing important spawning, rearing, and overwintering habitat for salmon on 35 priority waterbodies.

Stream protection

Six streams and 84 stream miles were added to the Anadromous Waters Catalog. Adding waters to the Anadromous Waters Catalog improves information about salmon distribution and affords streams the protections under state law that come by being listed. Currently less than 20% of the miles of mapped streams in Mat-Su are in the catalog.

Conserving water quantity

Partners have been completing water reservations on important salmon streams vulnerable to development. This means that as the region grows and demand for water resources increases, or climatic conditions change, water will be reserved to remain in the stream for salmon. Applications for water reservations have focused on covering the most populated 'core area'—Palmer-Wasilla-Knik area and along the Parks Highway from Willow to Talkeetna. These applications should be complete by 2017. A prioritization is underway by USGS, USFWS and ADF&G to help identify the next set of priority streams.

2000 Nearly 2,000 acres of important salmon habitat conserved.

6/84 6 streams and 84 stream miles added to the Anadromous Waters Catalog.



Mat-Su Salmon Habitat Partners

Alaska Department of Commerce, Community and Economic Development
 Alaska Department of Environmental Conservation
 *Alaska Department of Fish and Game
 Alaska Department of Natural Resources
 Alaska Department of Transportation & Public Facilities
 Alaska Center for the Environment
 Alaska Outdoor Council
 Alaska Pacific University
 Alaska Railroad Corporation
 *Alaska Salmon Alliance
 Alaska Trails
 AlaskaChem Engineering
 Alaskans for Palmer Hay Flats
 Aquatic Restoration & Research Institute
 Bureau of Land Management
 Butte Area Residents Civic Organization
 *Chickaloon Village Traditional Council
 City of Palmer
 ConocoPhillips Alaska, Inc
 Cook Inlet Aquaculture Association
 Cook Inletkeeper
 Eklutna Tribal Conservation District
 Environmental Protection Agency
 Envision Mat-Su
 Fishtale River Guides
 Glacier Ridge Properties
 Great Land Trust
 HDR Alaska, Inc
 Knik River Watershed Group
 Knik Tribal Conservation District
 Matanuska River Watershed Coalition
 *Matanuska-Susitna Borough
 Mat-Su Anglers
 Mat-Su Conservation Services
 Mat-Su Trails & Parks Foundation
 Montana Creek Campground
 *National Marine Fisheries Service/NOAA
 National Park Service
 *Native Village of Eklutna
 Natural Resources Conservation Service
 Palmer Soil and Water Conservation District
 Pioneer Reserve
 Pound Studio
 SAGA
 Sierra Club
 Sustainable Design Group
 The Conservation Fund
 *The Nature Conservancy
 The Wildlifers
 Three Parameters Plus, Inc
 *Tyonek Tribal Conservation District
 United Cook Inlet Drift Association
 United Fishermen of Alaska
 Upper Susitna Soil & Water Conservation District
 U.S. Army Corps of Engineers
 *U.S. Fish and Wildlife Service
 U.S. Geological Survey
 U.S. Forest Service
 Wasilla Soil and Water Conservation District



Great Land Trust partnered with the Student Conservation Association to build a light penetrating wetland boardwalk that provides an easy way for people to experience the Palmer Hay Flats Game Refuge.
 Kim Sollien/Great Land Trust

In conclusion

Our Partnership and salmon habitat conservation in the Mat-Su is strong because of the competence and involvement of our Partners. Each has unique knowledge, expertise and resources to achieve together what we could not alone. We invite you to join us—students, teachers, scientists, managers, landowners, fishermen, developers and industry—we can all contribute in positive ways to a future where salmon continue to thrive in the Mat-Su. Looking forward, the Partnership will continue to focus on the goals laid out in our strategic plan, ensuring that salmon have healthy habitat to rear in and return to in the Mat-Su. We have a lot of people to thank for our collective success, many that could not be included in this publication.



The Partnership has been an invaluable resource in connecting Great Land Trust with agency and community partners who have helped us target our conservation dollars toward the lands that provide highest value for salmon and water quality. Thanks to the support of the Partnership, GLT has successfully conserved over 8,000 acres including 6,000 acres of wetlands and 44 miles of shoreline important to salmon in the Mat-Su.

— Kim Sollien, Great Land Trust

The Partnership includes 59 organizations and two private individuals.
 *Organizations on the Steering Committee



Mat-Su salmon

PARTNERSHIP

Learn more and get in touch!

www.matsusalmon.org

Email: matsusalmon@tnc.org

Phone: 907-865-5713

Facebook:
<https://www.facebook.com/MatSuSalmon>

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IN REPLY REFER TO:
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United States Department of the Interior

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Mr. John Jensen, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

FEB 09 2017

Dear Chairman Jensen:

The Alaska Board of Fisheries (Board) will consider 173 proposals, among other issues, at its Upper Cook Inlet Finfish meeting in Anchorage from February 23 through March 8, 2017. We have reviewed the proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that have potential impacts on Federally qualified subsistence users and fisheries resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,


Eugene R. Peltola, Jr.
Assistant Regional Director

Enclosure

cc: Sam Cotten, ADF&G, Juneau
Anthony Christianson, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Thomas Brookover, ADF&G, Anchorage
Administrative Record

Glenn Haight, ADF&G, Juneau
Jill Klein, ADF&G, Anchorage
Stewart Cogswell, OSM, Anchorage
Scott Kelley, ADF&G Juneau
Interagency Staff Committee



**OFFICE OF SUBSISTENCE MANAGEMENT (OSM) COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
for the
UPPER COOK INLET MANAGEMENT AREA**

**State of Alaska
Board of Fisheries Meeting
February 23 – March 8, 2017
Anchorage, Alaska**



Office of Subsistence Management Comments

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

Proposal 71 – 5 AAC 57.120. Align size restrictions for Dolly Varden and rainbow trout bag limit in the flowing waters of the Kenai River Drainage Area.

Current Federal Regulations:

§____ 27(e)(10)(iv)(F)

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 18 inches in length are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession. Only one of these fish can be 20 inches or longer.

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

§____ 27(e)(10)(iv)(G)

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

(3) In flowing waters, daily harvest and possession limits for rainbow/steelhead trout are one per day and one in possession and it must be less than 16 inches in length. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

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

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal would result in increasing regulatory complexity and enforcement concerns because of the divergent State and Federal length limit regulations. If this proposal is adopted, the Federal Subsistence harvest size limits for Rainbow Trout and Dolly Varden in the Kenai River watershed below Skilak Lake will be more liberal (18 inches in length rather than 16 inches in length) than the new sport fishery limits.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adoption of this regulation would potentially reduce sport fishery induced mortality of Rainbow Trout and Dolly Varden by eliminating harvest of fish between 16 and 18 inches in



length and from catch and release mortality in the Kenai River below Skilak Lake. Reducing mortality rates caused by the sport fishery on high use area stocks may result in some minimal increase in the numbers of both species available for harvest by Federally qualified subsistence users.

Proposal 72 – 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Amend general provisions for lakes and ponds of the Kenai River drainage to restore winter ice fisheries for landlocked coho salmon less than 16 inches in length, as follows:

Current Federal Regulations:

§ 27(e)(10)

(iv) You may take only 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:

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. Current Federal subsistence fisheries regulations do not differentiate between landlocked and free swimming salmon in the Cook Inlet Area. Adoption of this proposal will result in additional harvest opportunity for Federally qualified subsistence users fishing with a rod and reel for landlocked Coho Salmon in the lakes and ponds under Federal subsistence fisheries jurisdiction.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adoption of this proposal will effectively authorize Federally qualified subsistence users to harvest landlocked Coho Salmon under 16 inches in length in waters under Federal subsistence fisheries jurisdiction in the lakes and ponds of the Kenai River Middle Section Area all year. Though the opportunities to participate in this fishery will depend upon temporary blockage of water bodies to form lakes and ponds following high water events in portions of the Kenai River drainage, authorizing this fishery may provide some additional opportunity for Federally qualified subsistence users if they choose to participate.

Proposal 73 – 5 AAC 56.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Align the Swanson River rainbow trout spawning closure with the proposed Kenai River drainage rainbow trout spawning closure start date.

Current Federal Regulations:

§100.27 Subsistence taking of fish.



§____ 27(e)(10)(4)(D)

(i) At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56 and 5 AAC 57 and 5 AAC 77.540).

§____ 27(e)(10)(4)(F)

For Federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik 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:

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal would result in expanding the season dates for the Federal subsistence rod and reel fishery in the Swanson River drainage by expanding the Rainbow Trout spawning closure period for an additional 19 days. At this time, adoption of this proposal is not expected to significantly impact current participation levels in the Federal subsistence fisheries of the Swanson River drainage.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The Alaska Department of Fish and Game submitted this proposal as part of a suite of proposals to simplify and align regulations. Detailed justification for this proposal was not offered. Support for this proposal is conditional and is dependent upon the Alaska Department of Fish and Game's justifications to increase fishing opportunity without significantly impacting the Swanson River Rainbow Trout population. Although adoption of this proposal would increase Federal subsistence users fishing opportunities in the Swanson River drainage, current participation levels are not expected to be significantly impacted. The OSM may change positions on this proposal depending upon further detailed justifications from Alaska Department of Fish and Games through staff comments or presentations at the Board of Fisheries meeting.

PROPOSAL 76 – 5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage



Area. Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar closure periods.

Current Federal Regulations:

§ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10' N. Lat.) and a line extending south from Cape Fairfield (148°50.25' W. Long.).*

(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 Cooper Landing, Hope, and Ninilchik may retain incidentally caught resident species.

(1) The household dip net and rod and reel gear fishery is limited to three sites:

(i) At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56 and 5 AAC 57 and 5 AAC 77.540).

(ii) At the Kenai River Mile 48 site, dip netting is allowed while either standing in the river or from a boat, from Federal regulatory markers on both sides of the Kenai River at about river mile 48 (approximately 2 miles below the outlet of Skilak Lake) downstream approximately 2.5 miles to a marker on the Kenai River at about river mile 45.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank



closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.540).

(2) Fishing seasons are as follows:

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

(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(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 (e)(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 (e)(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 two baited single or treble hooks June 15-August 31.

(F) For Federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik 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:

(J) Residents of Ninilchik may harvest Sockeye, Chinook, Coho, and Pink salmon with a gillnet in the Federal public waters of the Kenai River. Residents of Ninilchik may retain other species incidentally caught in the Kenai River except for Rainbow trout and Dolly



Varden 18 inches or longer. Rainbow trout and Dolly Varden 18 inches or greater must be released.

(4) Fishing will be allowed from June 15 through August 15 on the Kenai River unless closed or otherwise restricted by Federal special action.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. This complex proposal may impact Federally qualified subsistence users by restricting, shifting, or liberalizing the various fisheries closures in place to protect various spawning or milling fish stocks in the Kenai River drainage. Some of the proposed changes will potentially provide months of additional fishing opportunity for Federally qualified subsistence users while others may restrict months of fishing opportunities, depending upon which portion of the watershed is addressed. Adoption of this proposal will indirectly liberalize, delay, or restrict several of the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction. Other Federal subsistence fisheries of the Kenai River drainage are defined in Federal regulation and those defined fisheries season dates will not change if this proposal is adopted. Current Federal subsistence regulations for the Kenai River drainage state “*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...*” and adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

The following comparison is divided by component of each proposed change of the proposed area closures and is an attempt to illustrate the impacts this proposal will have on the Federal subsistence fisheries if adopted.

For the Funny and Killey rivers:

5 AAC 57.121(2) is amended to read:

*(2) the following waters of the Kenai River **drainage** are closed to sport fishing, as follows:*

*(A) from **May 1 – July 31** [APRIL 15 – AUGUST 15], Slikok Creek, **Funny River,**
and Killey River;*

Impacts from adoption of this portion of the proposal on the Federal subsistence rod and reel fishing regulations for the Funny and Killey rivers would be a mixture of restrictions and liberalizations depending upon tributary and what portion of the tributary being fished. The Federal subsistence seasons, areas “... *for take are the same as for the taking of these salmon species under State of Alaska fishing regulations...*” and if this proposal is adopted the Federal subsistence fishing seasons will change in the referenced areas of the Kenai River watershed.

For this section of the proposal, Federal subsistence rod and reel fishery is only authorized within the boundaries of the Kenai National Wildlife Refuge which include the majority of both the Killey and Funny rivers upstream of the Refuge Boundary. Adoption of this portion of the



proposal would result in restricting the Federal subsistence rod and reel fishery in that portion of the Funny River within the Refuge boundary by approximately three months (May 1 – July 31) annually (existing area open all year as compared to the proposed May 1 – July 31 closure). The portion of the proposal addressing the Killey River will impact the Federal subsistence fishing season by restricting the fishery for an additional three months (currently open all year as compared to the proposed May 1 – July 31 closure).

For the flowing waters of the Lower Kenai Section, including Beaver Creek, Soldotna Creek, and in the Moose River upstream of the Sterling Highway Bridge:

*(B) from **May 1 – June 10, all remaining** [JANUARY 1 – DECEMBER 31, THE] flowing waters of **the Lower Kenai Section, including Beaver Creek, Soldotna Creek, and in the Moose River upstream of the upper edge of the Sterling Highway Bridge** [UPSTREAM OF ADF&G MARKERS LOCATED APPROXIMATELY 100 FEET UPSTREAM FROM ITS CONFLUENCE WITH THE KENAI RIVER];*

For this section of the proposal, the Federal subsistence rod and reel fishery is only authorized within the boundaries of the Kenai National Wildlife Refuge upstream of the referenced part of the Moose River. Adoption of this portion of the proposal would result in liberalizing the Federal subsistence rod and reel fishery by one day (May 1). The proposed one day liberalization is not easily apparent in the proposed language because the existing regulation governing season length for the Funny River (5 AAC 57.121(2)(F)) would be repealed and the content of (F) would be moved to (B).

For the portion of the Kenai River upstream of the Lower Killey River to Skilak Lake outlet:

(K) from **May 1 – June 10** [MAY 2 – JUNE 10], in that portion of the Kenai River from an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake;

Federal subsistence rod and reel fishing regulations in the reference area below the outlet of Skilak Lake but above the Federal subsistence dipnet and rod and reel fishery area (that portion of the Kenai River below River Mile 48 that overlaps with the area identified in this proposal), like the State sport fishery season, would be restricted by one additional day (loss of May 1).

The Federal subsistence rod and reel fishery between Kenai River Mile 45.5-48 would not be impacted by this proposal because the Federal subsistence rod and reel fishing for salmon in the referenced area is cumulatively open from June 15 through September 30 for the different species. Adoption of the portion of the proposal which addresses the Kenai River upstream from River Mile 48 up to the outlet of Skilak Lake portion of the proposal will not impact the Federal subsistence rod and reel fishery season dates.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.



Rationale: Adoption of this proposal will potentially adjust some Federal subsistence fisheries season dates as a result of modifying State sport fishing area closures. Adoption of this proposal is not expected to result in changes to current effort or harvest levels in the Federal subsistence fisheries though it could initially increase regulatory complexity and user confusion.

The OSM does have concerns regarding significant expansion and restriction of the number of days of opportunity for sportfishing anglers which ultimately result in modification to Federal subsistence fisheries. The OSM's concerns are focused on proposing modifying fishing season lengths without providing detailed justifications for each proposed change, expected results, and potential impacts will have on the various fish species located in various portions of the Kenai River watershed.

Though adoption of this proposal may not result in significant changes to the Federal subsistence fisheries, ANILCA Title VIII provides for the closure of subsistence uses for conservation purposes, continuance of subsistence uses, or for reasons of public safety. The justifications offered by the proponent do not contain enough information to meet these thresholds. The OSM looks forward to receiving additional information from ADF&G at the Board of Fisheries meeting.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times would have to submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and/or submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 77 – 5 AAC 57.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar fishing seasons, such that anglers are prohibited from fishing for salmon.

Current Federal Regulations:

§ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10' N. Lat.) and a line extending south from Cape Fairfield (148°50.25' W. Long.).*

(iv) You may take only 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 Cooper Landing, Hope, and Ninilchik 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;

(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(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 (e)(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 (e)(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:

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

(G) For Federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik 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 Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.54), except for the following harvest and possession limits:

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

(3) In flowing waters, daily harvest and possession limits for rainbow/steelhead trout are one per day and one in possession and it must be less than 16 inches in length. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

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

Impact to Federal Subsistence users/fisheries: Yes. If this proposal is adopted, Federally qualified subsistence users may be slightly impacted by modifying the various fisheries closures in place for the “Middle River” area of the Kenai River watershed. These closures are in place to protect various spawning or milling fish in the Kenai River drainage as well as to provide opportunity for Sockeye Salmon to escape through the Russian River weir.

Adoption of this proposal will indirectly liberalize several of the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction because Federal subsistence rod and reel salmon fishing seasons in the Middle Kenai River and tributaries (except for portions of the Russian River) are identical to the State sport fishing season dates.

Other Federal subsistence fisheries of the Kenai River drainage, such as the dip net and rod and reel fishery from a Federal regulatory marker near the upstream end of the fish ladder at the Russian River Falls, downstream to a Federal regulatory marker approximately 600 yards below



the Russian River falls, are defined in Federal regulation and those defined fisheries season dates will not change if this proposal is adopted. Current Federal subsistence regulations for the Kenai River drainage state “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..., except as noted below (content of regulations summary book) or as superseded by Federal Special Action...” and adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

The following comparison is divided by component of each proposed change of the proposed area closures and is an attempt to illustrate the impacts this proposal will have on the Federal subsistence fisheries if adopted.

For the lower portion of the Middle Section of the Kenai River drainage and Cooper Creek.

*(1) the following waters of the Middle Section of Kenai River drainage are **closed to sport fishing**, [OPEN TO SPORT FISHING, ONLY] as follows:*

*(A) from **May 1 – June 10** [JUNE 11 – MAY 1], the Kenai River from the waters of Skilak Lake within a one-half mile radius of the Kenai River inlet, upstream to the downstream edge of the Sterling Highway Bridge at the outlet of Kenai Lake;*

*(B) from **May 1 – June 10 and from September 15 – October 31, the flowing waters of** [JUNE 11 – SEPTEMBER 14, AND FROM NOVEMBER 1 – MAY 1,] Cooper Creek;*

Federal subsistence rod and reel fishing regulations in the referenced area at and upstream of the inlet into Skilak Lake and Cooper Creek, like the State sport fishery season, would be restricted by one day additional day (May 1).

For the Russian River Drainage area:

*(C) **repealed** / **/2017** [FROM JUNE 11 – MAY 1, FLOWING WATERS OF THE RUSSIAN RIVER DRAINAGE UPSTREAM OF A POINT APPROXIMATELY 100 YARDS FROM ITS CONFLUENCE WITH THE KENAI RIVER, EXCLUDING UPPER RUSSIAN (GOAT) CREEK];*

*(D) **repealed** / **/2017** [FROM JULY 15 – MAY 1, THE RUSSIAN RIVER SANCTUARY, INCLUDING WATERS UPSTREAM FROM ADF&G REGULATORY MARKERS LOCATED JUST DOWNSTREAM OF THE FERRY CROSSING ON THE KENAI RIVER TO ADF&G REGULATORY MARKERS LOCATED APPROXIMATELY 300 YARDS UPSTREAM OF THE PUBLIC BOAT LAUNCH AT SPORTSMANS LANDING (INCLUDING THE WATERS AROUND THE UPSTREAM END OF THE ISLAND NEAR THE RUSSIAN RIVER MOUTH) AND THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM 100 YARDS TO ADF&G REGULATORY MARKERS IS OPEN TO SPORT FISHING, EXCEPT SOCKEYE SALMON MAY BE TAKEN ONLY FROM JULY 15 – AUGUST 20];*



(E) repealed / /2017 [FROM JUNE 11 – AUGUST 20, THE WATERS OF THE KENAI RIVER NEAR THE CONFLUENCE OF THE RUSSIAN RIVER, FROM THE POWERLINE CROSSING ON THE KENAI RIVER UPSTREAM TO THE FERRY CROSSING, ARE OPEN TO SPORT FISHING FOR SOCKEYE SALMON];

(F) repealed / /2017 [FROM JUNE 11 – AUGUST 20, THE WATERS OF THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM TO AN ADF&G REGULATORY MARKER LOCATED APPROXIMATELY 600 YARDS DOWNSTREAM FORM THE FALLS ARE OPEN SPORT FISHING FOR SOCKEYE SALMON];

(G) from May 1 – June 10 [JUNE 11 – JULY 31], and from August 1 – August 31 [SEPTEMBER 1 – MAY 1], the Upper Russian (Goat) Creek upstream from an ADF&G regulatory marker located approximately 300 yards from its confluence with Upper Russian Lake;

To be mostly replaced with:

(5) all tributaries to the Middle Section of the Kenai River, except a section of the Russian River drainage downstream [UPSTREAM] of an ADF&G regulatory marker located approximately 600 yards downstream from the falls are [IS] closed to sport fishing for salmon;

H) from May 1 – June 10, the flowing waters of [JUNE 11 – MAY 1] Jean Lake Creek, Juneau Creek, the Russian River upstream of a point approximately 100 yards from its confluence with the Kenai River, excluding Upper Russian (Goat) Creek, and Hidden Lake Creek;

(I) repealed / /2017 [FROM JULY 1-SEPTEMBER 30, THE WATERS OF THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM TO AN ADF&G REGULATORY MARKER LOCATED APPROXIMATELY 600 YARDS DOWNSTREAM FORM THE FALLS ARE OPEN SPORT FISHING FOR COHO SALMON];

5 AAC 57.122 is amended by adding a new paragraph to read:

(10) the following waters of the Middle Section of Kenai River drainage are open to sport fishing, only as follows:

(A) from July 15 – April 30, the Russian River Sanctuary, including waters upstream from ADF&G regulatory markers located just downstream of the ferry crossing on the Kenai River to ADF&G regulatory markers located approximately 300 yards upstream of the public boat launch at Sportsman's Landing (including the waters around the upstream end of the island near the Russian River mouth) and the Russian River from its mouth upstream 100 yards to ADF&G regulatory markers is open to sport fishing, except sockeye salmon may be taken only from July 15 – August 20;

(B) from June 11 – August 20, the waters of the Kenai River near the confluence of the Russian River, from the powerline crossing on the Kenai River upstream to the Ferry Crossing, are open to sport fishing for sockeye salmon;



(C) from June 11 – August 20, the waters of the Russian River from its mouth upstream to an ADF&G regulatory marker located approximately 600 yards downstream from the falls are open to sport fishing for sockeye salmon;

(D) from July 1 – September 30, the waters of the Russian River from its mouth upstream to an ADF&G regulatory marker located approximately 600 yards downstream from the falls are open to sport fishing for coho salmon.

The fishing season for the Federal subsistence rod and reel portion of the dipnet and rod and reel fishing regulations for a section of the Russian River near the falls is from June 15 through August 15. Adoption of this proposal will not impact the rod and reel portion of the dip net and rod and reel Federal subsistence fishery season length or dates with that area defined in §____ 27(e)(10(iv)(D(1)(iii)). The fishing season for the Federal subsistence general rod and reel fishery in the Russian River drainage will be impacted by the proposed changes by liberalizing the season dates by one day (e.g. May 1)

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the restrictive impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rationale: Adoption of this proposal will potentially adjust some Federal subsistence fisheries season dates as a result of modifying State sport fishing area closures by one day of gained or lost fishing opportunity (May 1). Adoption of this proposal will also potentially adjust some Federal subsistence fisheries season dates as a result from modifying State sport fishing area closures. Adoption of this proposal is not expected to result in changes to current effort or harvest levels in the Federal subsistence fisheries.

Though adoption of this proposal may not result in changes to the Federal subsistence fisheries as significant as requested in Proposal 76, the OSM has the same concerns expressed for Proposal 76 regarding restricting Federally qualified subsistence users without utilizing the thresholds contained in ANILCA.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request the desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 78 – 5 AAC 57.123. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Upper Section of the Kenai River Drainage Area. Align the closure start date for all the tributaries of the Upper Section of the Kenai River Drainage Area with the start dates proposed for the king salmon sanctuaries and the start dates proposed for the rainbow trout spawning closure. In addition, create the same fishing season in all the tributaries of the Upper Section of the Kenai River Drainage area.



Current Federal Regulations:

§ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10' N. Lat.) and a line extending south from Cape Fairfield (148°50.25' W. Long.).*

(iv) You may take only 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 Cooper Landing, Hope, and Ninilchik 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;



(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(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 (e)(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 (e)(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:

(G) For Federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik 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 Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.54), except for the following harvest and possession limits:

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

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

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal will indirectly restrict the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction within the waters referenced in the proposal. The Federal subsistence rod and reel salmon fishing seasons in the Upper Kenai River and tributaries are identical to the State sport fishing season dates and adoption of this proposal will reduce the Federal subsistence fishing season by one day (May 1). Current Federal subsistence regulations for the Kenai River drainage state “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...except as noted below (content of regulations summary book) or as superseded by Federal Special Action...". Adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery but **opposes** the restrictive impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rationale: Adoption of this proposal will potentially restrict Federal subsistence rod and reel fisheries season length by one day (May 1) as a result from modifying State sport fishing area closures in the Upper Kenai River drainage area. The proponent indicates the intention of the proposal is to simplify and align regulations.

Though adoption of this proposal may not result in changes to the Federal subsistence fisheries as significant as requested in Proposal 76, the OSM has the same concerns expressed for Proposals 76 and 77 regarding restricting Federally qualified subsistence users without utilizing the thresholds contained in ANILCA.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 98 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Reduce sport fishery bag limit for coho salmon on the west side of Cook Inlet and close drift gillnet fishing in Areas 3 and 4 for remainder of season if coho salmon sport fishing is restricted or closed in the Little Susitna River.

Current Federal Regulations:

§____ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10' N. Lat.) and a line extending south from Cape Fairfield (148°50.25' W. Long.).*

(ii) You may take fish by gear listed in this part unless restricted in this section or under the terms of a subsistence fishing permit (as may be modified by this section). For all fish that must be marked and recorded on a permit in this section, they must be marked and recorded prior to leaving the fishing site. The fishing site includes the particular Federal public waters and/or adjacent shoreline from which the fish were harvested.

(iv) You may take only 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:

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

Impact to Federal Subsistence users/fisheries: Yes. Currently, Federal subsistence rod and reel fisheries regulations governing the fresh waters under Federal subsistence fisheries jurisdiction on the west side of Cook Inlet do not specify harvest and possession limits thus §____ 27(e)(10)(iv) states the limits will be the same as those for the Alaska sport fishing regulations. If this proposal is adopted the Coho Salmon sport fishery harvest limits in the streams on the west side of Cook Inlet are restricted based upon management actions for entirely different watersheds, Federally qualified subsistence users will be unnecessarily restricted by a 33% reduction in the daily harvest limit.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Adoption of this proposal may result in harvest limit restrictions on Federally qualified subsistence users fishing in the freshwater streams under Federal subsistence jurisdiction on the west side of Cook Inlet. The potential harvest limit reduction would be based on management actions for separate watersheds and may not be based on conservation concerns, challenges to continuance of subsistence uses, or public safety reasons for the specific streams within Federal public lands boundaries being fished by Federally qualified subsistence users. Though adoption of this proposal will not likely impact effort, participation, or harvest levels in the Federal subsistence rod and reel fisheries in the area of concern, the OSM opposes unnecessary restrictions to Federally qualified subsistence users but is neutral on the impacts to the sport fisheries.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to retain three Coho Salmon in the Federal subsistence rod and reel fisheries may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request desired long term changes to the harvest and possession limits for these fisheries during the fisheries proposal 2017/2018 cycle. The freshwaters under Federal subsistence jurisdiction potentially impacted by this proposal include flowing waters within the Lake Clark National Park and some of the drainage headwaters of the Susitna valley waters within the Denali National Park and Preserve.

Proposal 14 – 5 AAC 56.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Allow snagging for Sockeye Salmon in all Cook Inlet freshwater lakes.

Current Federal Regulations:

Current Federal subsistence fishing regulations prohibit retaining Sockeye Salmon snagged with a rod and reel in the Cook Inlet Area. Current Federal subsistence fishing regulations do authorize snagging salmon with a hand line or hook and line attached to a rod and reel in a few areas of Alaska within waters under Federal subsistence fisheries jurisdiction. The areas where



snagging is authorized are in more remote parts of the State in low participation fisheries (as compared to the more accessible Cook Inlet Area high use fisheries).

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. If this proposal is adopted as written, some Sockeye Salmon sport fisheries in the freshwater lakes of the Cook Inlet Area may lead to conservation concerns and eventual challenges to continuance of subsistence uses. If this proposal is adopted as written, authorizing intentional snagging in the sport fisheries may increase mortality of incidentally snagged non-target fish and wounding loss in targeted species. Snagging is an indiscriminate method and means and damage to non-target species, target species outside of a legal size limits, and target species in a condition which an angler chooses not to retain (water marked etc.) may lead to high mortality rates of non-retained fish (e.g., gut hooked small fish or eye hooked in-slot Chinook Salmon), additive to conservation concerns for species under restrictive protections (above length limit trout and char), or lead to wanton waste of mortally wounded less desirable fish (jacks, heavily net marked, or fish not fit for most human consumptive practices).

Adoption of this proposal may have unintended consequences for remote lakes with diminutive Sockeye Salmon populations such as those found in some streams and lakes on the west side of Cook Inlet which are accessed by small aircraft. Small West Cook Inlet Sockeye Salmon stocks that could be impacted by this proposal and potentially comprise a conservation concern for the Crescent Lake population, which experiences notable fly-in angler pressure with sometimes up to 100 anglers per day. Potential conservation issues arise due to the relatively small population size on the spawning grounds which could be vulnerable to impact of additional snagging take or mortality due to snagging.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rational: Adoption of this proposal may lead to conservation concerns for some Cook Inlet Sockeye Salmon stocks eventually leading to challenges to continuance of subsistence uses for Federally qualified subsistence users. Authorizing intentional snagging in the sport fisheries may increase mortality of incidentally snagged target and non-target fish.

PROPOSAL 159 - 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai river Drainage Area. and 5 AAC 57.121. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Extend the time that the slot limit for Kenai River king salmon is in effect.

Current Federal Regulations:

§____ 100.27 Subsistence taking of fish.



(e)(10)(iv)(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 (e)(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 (e)(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 two baited single or treble hooks June 15-August 31.

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

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

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

Impact to Federal Subsistence users/fisheries: Yes. There are specific Federal subsistence regulations for the Chinook Salmon fishery in the Kenai River, including a 46-55 inch slot harvest limit. The Federal subsistence fishery early-run slot limit season dates of January 1 through July 14 for the rod and reel only fishery are adopted by reference from State of Alaska sport fishing regulations governing the sport fishery from the Sterling Highway Bridge in Soldotna upriver to the outlet of Skilak Lake. Separate Federal subsistence regulations for late-run Chinook Salmon harvested in the dip net and rod and reel fishery from July 16 –September 30 currently do not include a slot limit.

If this proposal is adopted as written, the slot limit for the Kenai River Chinook salmon sport fishery would be extended through July 31 which would, by default, extend the slot limit for the Federal subsistence rod and reel only fishery from July 15 through July 31, effectively creating a fishery more restrictive than in current Federal regulation. Adoption of this proposal will require the release of an unknown number of Chinook Salmon caught in both the sport and Federal subsistence fisheries. The number of Chinook Salmon released between 42 and 55 inches in length for the sport fishery and the number of Chinook Salmon released between 46 and 55 inches in length from the Federal subsistence fishery may benefit the Chinook Salmon stocks of the Kenai River at some unknown level by allowing those fish to pass through the fisheries potentially increasing spawning success of larger and more fecund fish.

Federal position/recommended action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.



Rational: The Federal Subsistence Board adopted the current slot harvest limit regulations (46"-55") for resource conservation as advised by Federal staff and based largely on information provided by the State. The season dates for the Kenai River Chinook Salmon slot limit do not exist in Federal subsistence regulations, rather the season dates are adopted by reference from State regulations.

Increasing the Kenai River early-run Chinook Salmon slot limit season dates by extending the season through the two remaining weeks in July will impact Federally qualified subsistence users who choose to fish with a rod and reel for Chinook Salmon during that time frame. It is unknown how many Chinook Salmon between 46 and 55 inches in length would be foregone by Federally qualified subsistence users fishing for Chinook Salmon with a rod and reel if this proposal is adopted as participation in this fishery has been minimal to date.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to harvest Chinook Salmon with a rod and reel between July 16 - 31 without a slot limit, they could choose to participate in the dip net and rod and reel fisheries within the portions of the Kenai River as authorized by Federal regulation where a slot limit does not apply. If a Federally qualified subsistence user preferred to harvest Chinook Salmon in the rod and reel only Federal subsistence fishery between July 16 - 31 without a slot limit, the user would have to submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and/or submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 178 - 5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Increase the number of days only non-motorized vessels may fish on the lower Kenai River.

Current Federal Regulations:

§_____.27(i)(10)(iv) *You may take only 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 (e)(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 (e)(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:

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

Impact to Federal subsistence users/fisheries. Yes. Seasons, harvest and possession limits, and methods and means for take are the same as for taking of those species under Alaska sport fishing regulations (5AAC 56 and 5AAC 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 who do not own or have access to a drift boat. Additionally, access to and participation in the Kenai River Federal subsistence dipnet fisheries at river mile 48 and at Moose Range Meadows would be severely restricted or eliminated as both require motorized vessels as a platform for efficient and effective dipnetting.

Federal position/recommended action: The OSM recommendation is to **oppose** this proposal.

Rational: The OSM supports conservation of the resource and would support this proposal if adoption was necessary to address a biological concern in waters under Federal subsistence fisheries jurisdiction. However, this proposal appears to address a social issue (crowding) rather than a biological issue. Unless a conservation concern exists, adoption of 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.

If this proposal is adopted, the Federal inseason manager could submit a Special Action request to the Federal Subsistence Board to temporarily change Federal regulations (effective for a maximum of 60 days) to adjust methods and means for Federally qualified subsistence users to provide additional fishing opportunity to Federally qualified subsistence users. If the proposal is adopted, a proposal could be submitted to the Federal Subsistence Board to modify Federal subsistence fisheries regulations to allow fishing from other-than-drift boats on the listed days.

PROPOSAL 192 - 5 AAC 57.122. Special Provisions for the seasons bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Shorten the Kenai River coho season by closing October 31.

Current Federal Regulations:

§_____.27(i)(10)(iv) *You may take only 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 (e)(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 (e)(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:

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

Impact to Federal subsistence users/fisheries. Yes. Seasons, harvest and possession limits, and methods and means for take are the same as for taking of those species under Alaska sport fishing regulations (5AAC 56 and 5AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, the identified portion of the Kenai River would be closed to Federally-qualified subsistence users for Coho Salmon during the month of November. The area identified in the proposal does encompass several miles of the Kenai River which is within the Kenai National Wildlife Refuge and thus is under Federal subsistence fisheries jurisdiction.

Federal position/recommended action: The OSM recommendation is to **oppose** this proposal.

Rational: The OSM opposes this proposal because adoption of this proposal will effectively restrict Federally qualified subsistence users' opportunity to harvest Coho Salmon in the Federal subsistence fisheries of the Kenai River below Skilak Lake during the month of November. Adoption of this proposal may result in placing the administrative burden on Federally qualified subsistence users who desire to continue to fish for Coho Salmon during the month of November to submit a Special Action Request to the Federal Subsistence Board to temporarily reauthorize the fishery during November. The Federally qualified subsistence user would be further burdened by being required to submit a proposal to the Federal Subsistence Board during the next fisheries regulatory cycle to re-authorize the Federal subsistence fishery for Coho Salmon during the month of November.

PROPOSAL 279 – 5 AAC 07.365. Kuskokwim River Salmon Management Plan. Submitted by Alaska Board of Fisheries. Clarify when 4-inch mesh set gillnets may be used during the early season king salmon subsistence fishery closure.

Current Federal Regulations:

§____ 100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§____ 100.27 Subsistence taking of fish.



(4)(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action.

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

Impact to Federal subsistence users/fisheries. Yes. Adoption of this proposal may provide some limited early season fishing opportunities for Federally qualified subsistence users who choose to target fish other than Chinook Salmon during years when managers project the Chinook Salmon return will fall within the drainagewide escapement goal range. If this proposal is adopted and managers project the drainagewide escapement goal range will be exceeded, Federally qualified subsistence users who choose to participate in the State managed fishery will have the opportunity to fish seven days per week with the described gear.

Additionally, adoption of this proposal may result in enforcement concerns for both subsistence users and agency enforcement officers regarding the operation of a set gillnet proposed restriction prohibiting any part of the gillnet from being more than 100 feet from the ordinary high water mark.

Federal position/recommended action: The OSM recommendation is to **support** this proposal.

Rational: Adoption of this proposal will allow for some targeted subsistence harvest of species other than Chinook Salmon during the early season Chinook Salmon closure currently in State regulations. As written, the proposal limits this potential fishing opportunity to times when managers estimate the Chinook Salmon return will fall within or exceed the Kuskokwim Drainage escapement goal range. If this proposal is adopted, Federally qualified subsistence users will have opportunity to harvest other species with defined shore bound set gill nets of 4 inches stretch mesh in a manner which will reduce the incidental mortality of Chinook Salmon.

Adoption of this proposal and the resulting additional fishing opportunity will likely be beneficial to all subsistence users as long as both targeted and non-targeted species exploitation rates continue to be sustainable. If incidental mortality of Chinook Salmon becomes cumulative enough to cause concerns for the managers, both State and Federal management actions can be enacted to ensure the conservation of the resource.



Submitted By
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Submitted On
2/6/2017 11:41:44 AM
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I SUPPORT THIS PROPOSAL, for the same reasons as listed below by Mr. Hollier.

PROPOSAL 140 - 5 AAC 21.331. Gillnet specifications and operations. Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth, as follows:

5 AAC 21.3311 (d) (x)

A set gillnet that is no more that 29 meshes deep, can be up to 45 fathoms long. The total aggregate, for one set net permit, can be no more that 135 fathoms for these voluntarily fished nets.

What is the issue you would like the board to address and why? The issue here is how to minimize late-run Kenai River king salmon harvest, while maximizing sockeye salmon harvest in the commercial set net fishery, in the Upper Subdistrict

In the Kenai River late-Run Sockeye Salmon Management Plan (KRLRSSMP). (a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial use. The department shall also manage the commercial fishery to minimize the harvest, late-run Kenai River king,....

Satisfying these two main objectives in the KRLRSSMP by the department, sometimes is very challenging, to say the least.

The 2013 KINTAMA study in Cook Inlet, indicated that king salmon swim at an average depth of 16 ft. Sockeye salmon swim at an average depth of 6 ft.

There are some setnetters in Cook Inlet who voluntarily fish 29 mesh deep gear. They do so to MINIMIZE king harvest, while still being economically viable catching sockeye. 29 mesh deep nets hang about 12 ft. deep at slack tide. A 45 mesh deep net hangs about 18 ft. at slack tide.

Many setnetters are very reluctant to change to shallow gear, for a variety of reasons. Setnetters by regulation should not be mandated to fish 29 mesh deep gear.

A very viable solution to persuade setnetters to VOLUNTARILY fish 29 mesh deep gear, would be to increase the length of those nets to 45 fathoms. At this length and depth of the nets, there would be still 17% less gear in the water, than the current regulation.

I believe a regulation like this in the KRLRSSMP would certainly meet the intent of 5 ACC 21.360 (a), to commercially harvest sockeye while helping minimizing king harvest.



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2/6/2017 11:47:44 AM
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I Support Proposal 136, for all the reasons listed below as outlined by MR. Hollier, although I fish outside of the 600 ft. area listed, I believe it to be a good proposal to help manage the Kasilof Area.

PROPOSAL 136 – 5 AAC 21.310. Fishing Seasons. Allow commercial fishing with set gillnets in the North Kalifornsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8, as follows:

NKB, MAY have the opportunity to harvest with SELECT gear, (4 3/4 in maximum mesh size and can't be more than 29 meshes deep), from July 8 on, when any portion of the Kasilof section is fishing. The set nets fished on NKB, cannot fish farther than 600 ft from the mean high tide mark.

Fishing within 600 ft, from mean high tide, using SELECT gear, with 29 mesh deep nets would make the king salmon harvest minimal. Additionally using, 4 3/4 in mesh or smaller, would be very efficient in harvesting Kasilof sockeye that are abundant on the beach, and those smaller size fish that make up 61% of the Kasilof River escapement. It is these two ocean and younger age classes that continually drive the Kasilof River over the top end of its BEG.

By fishing NKB, with SELECT gear, should cut down on the amount of time fished in the KRSHA.

The regulation would read something like this:

From July 8 on, when any portion of the Kasilof section is fishing; North Kalifornsky Beach, stat area 244-32, MAY open with set gill nets, restricted to fishing within 600 ft from the mean high tide mark. Nets cannot be more than 29 meshes deep and the mesh size cannot exceed 4 3/4 in.

What is the issue you would like the board to address and why? The issue here is lack of traditional and historic harvest of Kasilof sockeye on North Kalifornsky Beach (NKB), statistical area 244-32.

NKB since before Statehood was a traditional and historic harvester of Kasilof sockeye. With management changes that went into place in 1999, the opportunity to harvest Kasilof stocks were greatly diminished for NKB.

ADF&G staff has stated that Kasilof sockeye are predominately "beach orientated". The ESSN fishery catches 58% of the Kasilof harvest, while the Drift fleet harvests 27%.

A 2009 report from ADF&G- *Genetic Stock Identification of Upper Cook Inlet Sockeye Salmon Harvest*, showed that the harvest of Kenai and Kasilof sockeye on all NKB was close to a 50/50 split between the two stocks, (page 52). This study was taken from samples of the entire NKB section. If samples were taken only from nets fishing 600 ft of mean high tide, Kasilof sockeye that are predominately "beach orientated", the Kasilof sockeye proportion would be undoubtedly higher.

From 1979 to 1999, the Kasilof River exceeded its BEG 12 out of 21 years, (57% of the time). During some of this time period the Kasilof River escapement goal was considerable less, 75,000 to 150,000 sockeye. During this time NKB was a traditional and historic harvester of Kasilof sockeye.



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PROPOSAL 165 - 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan.

SUPPORT THIS PROPOSAL, For the same reasons as listed below by Mr. Hollier.

Decrease the trigger for management actions on Kenai River late-run king salmon from 22,500 to 16,500, as follows:

I would like to see (f) be deleted from the plan, but I don't think this will happen, therefore:

To err on the side of conservation, I would like the 22,500 number of projected king salmon escapement lowered to 16,500 in this regulation (f).

The regulation would read something like this:

(f) From August 1 through August 15, if the projected escapement of king salmon into the Kenai River is at least **15,000, but less than 16,500** [16,500, but less than 22,500], notwithstanding ...

What is the issue you would like the board to address and why? In the Kenai River Late-Run King Salmon Management Plan (KRLRKSMMP) the sustainable escapement goal (SEG) is 15,000- 30,000 king salmon. The mid point of the SEG is 22,500 king salmon. From August 1 through August 15 if the projected escapement of king salmon into the Kenai River is less than 22,500, the Upper Subdistrict set gillnet fishery can fish no more than 36 hours.

22,500 kings is far to liberal. There is no biological reason or data, that can justify for this number. 22,500 puts unnecessary restrictions on the ESSN fishery. In the Kenai-East Forelands sections, where in some years up to 25% of their harvest can occur in August, the current regulation is very devastating.

If 15,000 is the minimum goal, and the minimum escapement goal is projected, why are there any time restrictions put on the set net fleet?



Submitted By
Pautzke Bait
Submitted On
2/9/2017 8:51:52 PM
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My name is Chris Shaffer, and I represent the Pautzke Bait Company. Many know Pautzke Bait Company as the business that produces the green covered jars of bright red salmon eggs know as Balls O' Fire. In addition to those salmon eggs, frequently used by trout anglers, Pautzke Bait Company also sells salmon roe, bait cures for fresh salmon roe, bait dyes, and scent frequently used by sport salmon anglers. Pautzke Bait Company both purchases salmon roe from the commercial fishing industry and sells bait and bait products primarily to the sport fishing industry.

Pautzke Bait is concerned about decreasing opportunities for sport anglers to use bait and bait products when fishing for Upper Cook Inlet's abundant salmon resources. Bait restrictions adopted by the Alaska Board of Fisheries and emergency bait restrictions implemented inseason by the Alaska Department of Fish and Game take an unreasonably large share of potential bait and bait product sales from our business. Consider for example, what has happened in the Northern Cook Inlet Management Area-- before 1996 bait use was allowed in all or nearly all of the Northern Cook Inlet freshwater king salmon sport fisheries. This past year during the May 1-- July 13 bait use for ocean-run king salmon in the management area was only allowed at the hatchery produced Eklutna Tailrace fishery, the Deshka River starting on June 1, and at Little Susitna River (but only from July 6 -- 13).

The 2016 sport fishery for coho salmon on the Little Susitna River in the Northern Management Area saw a bait restriction for the entire time after the king salmon fishery closed on July 14 through December 31. No legal opportunity for sport anglers to fish for salmon with even a single salmon egg in the Little Susitna River -- yet at the same time commercial gill netting was allowed within one mile of the Little Susitna River mouth through August 15. If there are not enough coho salmon to allow even the use of one single salmon egg for sport anglers, then there should not be enough salmon to allow commercial fishing within one mile of the river mouth.

Even at locations in the Northern Management Area where bait was still allowed during the 2016 coho salmon season, because of an extreme shortage of coho salmon allowed into the streams sport coho catch and harvest were much lower than average. At the same time, the Northern District commercial fishery was allowed to harvest close to their average annual 10 year take of coho salmon -- even though these fish, by management plan are designated by the Board to be managed primarily for the sport and guided sport users.

At Jim Creek, the coho shortage was so severe that the Department of Fish and Game entirely closed the sport fishery inseason by emergency order, and only 108 coho were counted at the McRoberts Creek index area -- less than 1/4 of the escapement range minimum of 450 coho spawners.

In short, Pautzke Bait Company requests a more reasonable sharing of the Northern Cook Inlet coho salmon resource, that better meets the needs to sustain coho salmon sport fisheries and coho salmon sport harvests for the thousands of sport anglers who participate and who purchase Alaska fishing licenses that support the management of this fishery. Anytime commercial opportunity is provided in August for Northern Cook Inlet coho salmon, bait fishing opportunity should also be provided on the larger sport fisheries in the area including both Little Susitna River and Jim Creek.

Pautzke Bait Company therefore supports Proposal 215 which would recognize the significance of the Little Susitna River king salmon and coho salmon sport fisheries and establish a one-statue-mile closed waters radius from where the mouth of Little Susitna River meets Knik Arm. Similar to such closed water around most other streams with significant salmon production in Upper Cook Inlet, these waters would be closed to commercial fishing in order to allow staging king salmon and coho salmon a more realistic opportunity to migrate upstream. This is the best option which could allow sport anglers a more realistic annual opportunity to use bait while fishing the Little



Susitna River for salmon. It should be mentioned that Little Susitna River anglers are already shouldering a significant portion of king salmon and coho salmon conservation burden through board established regulations that do not allow any bait fishing during king salmon season (unless king salmon escapement goals can be projected beyond the upper range of the goal) and only allow bait fishing from August 6 - September 30 during coho season.

Pautzke Bait Company also supports Proposal 92, Proposal 93, and Proposal 95 which would require the Central District Drift Gillnet fishery to fish in a more stock selective manner during August and allow the passage of more coho salmon through to Northern Cook Inlet waters -- both to provide a better opportunity to meet escapement goals and to provide reasonable opportunity for Northern Management Area coho salmon sport fisheries. Such changes, if adopted by the Board, would better align the fishery to goals stated in the Central District Drift Gillnet Fishery Management Plan -- and the plan would still allow the use of emergency order fishing time in the event of an unusually large late sockeye salmon return. Such changes as offered by these 3 proposals would also more closely follow guidelines of 5 AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries.

Finally Pautzke Bait Company supports proposal 212 which would close the Northern District commercial set net fishery after August 15. Currently the Northern District set net fishery harvests significantly more coho salmon per delivery than any other commercial user group in Upper Cook Inlet. It is understandable that the Northern District set net fishery will harvest some coho salmon while fishing during times of sockeye, pink, and chum salmon abundance. After August 15, however, the numbers of these salmon, managed primarily for commercial use, declines significantly, and coho salmon can dominate Northern District commercial harvests.

Such a change in regulation as suggested in proposal 212 would more closely align salmon management with preamble language of 5AAC 21.353 Northern District Salmon Management Plan. The first stated purpose of the plan is to, "minimize the harvest of coho salmon bound for the Northern District of Upper Cook Inlet." The Plan further directs, "The department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon resources over the entire run as measured by the frequency of inseason restrictions, or as specified in this section or other regulations."

Minimizing commercial Northern District coho harvest by a commercial closure after August 15, rather than earlier in the season, would allow continued commercial harvest at a time when sockeye, chum, and pink are in better condition and larger abundance. If the Board allowed additional salmon to pass through the Central District Conservation Corridor in early August, likely any reduction in Northern District coho harvest after August 15, would more than be made up for with increased harvest of all salmon species during the first two weeks of August. Such a change would increase the chances of attaining adequate Northern District coho salmon escapement goals, and also allow a better late-season opportunity for reasonable sport coho harvests. It could also allow a more consistent bait fishing opportunity for salmon anglers fishing the Little Susitna River and Jim Creek.

Thank you, Board Members, for considering the concerns of Pautzke Bait Company when adopting regulations for Upper Cook Inlet salmon fisheries.

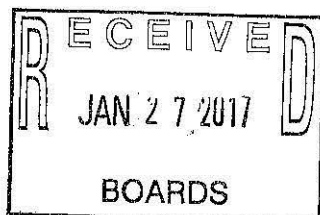
Sincerely

Pautzke Bait Company



Submitted By
Penny Johnson
Submitted On
2/7/2017 2:29:28 PM
Affiliation

I'm neither a commercial fisher or a dipnetter. But, I think it's important to consider the issue of waste that happens in both of these fishery events. There is a frenzied, greedy effect with the dipnetting. I've seen it. I would like to ask if people consider there may be much waste from thousands of freezer cleanouts at the end of each winter. Then I also wonder if there's an equivalent with the commercial fishery when it reaches retail. Then, I'd like to ask if people understand that if they don't self-regulate, then the government will do it for them; much to their dissatisfaction, no doubt. It's akin to parents saying "now, children, you must share - and the kids are destroying whatever it is they're fighting over". Let's not let that happen, or there won't be anything for anyone. This truly is the issue at hand.



January 24, 2017

ADF&G Boards Support
John Jensen, Board of Fisheries Chair
Ted Spraker, Board of Game Chair
PO Box 115526
Juneau, AK 99811-5526

Dear Chair Jensen and Chair Spraker,

The Petersburg Borough Assembly would like to invite your Boards to consider conducting future board meetings in our historic little fishing community when the location will suit your meeting agenda. Holding a board meeting in Petersburg will provide your board members many distinctive opportunities, such as touring the new hatchery at Crystal Lake, walking the harbor docks and visiting with hunters and fishermen, exploring our quaint downtown shops, and enjoying the stunning scenery, just to name a few. With enough advance notice, we will be happy to assist with scheduling, meeting locations, lodging options, meal options, etc.

Petersburg supports and appreciates both Boards' efforts to equitably regulate and preserve Alaska's fisheries and wildlife resources. We look forward to the opportunity to welcome you all to town.

Sincerely,

Debra K. Thompson
Borough Clerk



Submitted By
Preston Williams
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2/9/2017 3:40:02 PM
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Home Owner on River

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(I DO NOT EXCEPT THIS Proposal) 201-5AAC 77.540 Upper Cook Inlet Personal use Salmon Fishery Management Plan. This proposal by Alaska Department of Fish and Game should have covered the repair of damage at the Warren Ames Bridge South and North side and should go down the River to the (DNR_DROP) Kenai River Special Management area Marker at Mile Four. This would allow the private Home Owners down River from the Marker to Dep Net. These Private Home Owners have State approved Lifts and Stairways to get to the River without damage to the Banks. Plus they have been Dep Netting ever since the state opened the Dep Net Area. If it is the intent of Alaska Department of Fish and Game to close all the above Waters, then the Private Home Owners with proper State approved Lifts and Stairways should be able to Dep Net from their property. For their land goes out into the River to the high mean water line. The boats in the Dip Net Fishery are out in front of my property are damaging my bank. I have lost about five feet of bank from the waves the boats make when the tide is around 20 to 21 feet and above. I put Proposal 5AAC- 77.540(a)(6)(c)(1)(c) back in 2012 to try and save my vegetation and bank from negatively impacting the riparian habitat however, the board did not accept my Proposal.



Submitted By
Ralph Renzi
Submitted On
2/7/2017 1:27:08 PM
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Alaska Board of Fisheries

To Whom it may concern,

Sportfishing is a vital part of the Mat-Su economy. For the last three years more returning salmon (coho 2014 & 2015, sockeye 2015, and kings 2015 & 2016) has meant more people fishing and making purchases at local stores. It has meant more customers for the struggling fishing guide industry, more business for riverside campgrounds, lodging, RV facilities and the tourism industry, gas stations, grocery stores, fish processors and UPS-type shippers.

For Alaskans, especially disabled veterans like myself, on the Little Susitna River, Deshka River, and Fish Creek, it has meant a return to a time when it wasn't so hard to catch a fish.

The higher returns in coho and sockeye started happening after the Conservation Corridor was approved in 2014. Before that increase, the number of angler days had been at its lowest level since the 1970s.

I wholeheartedly support keeping the Conservation Corridor open and oppose any proposals that seek to weaken the corridor.

Sincerely,

Ralph Renzi
TSgt, USAF (retired)



REPRESENTATIVE LES GARA

February 8, 2017

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

Re: Kenai River-Bound Sockeye Salmon Dipnetting Season Extension Proposals 202 and 203: Season Should Be Extended To Extent of Commercial Fishing Extensions When Consistent With Escapement Goals, And When Not Harmful To Kenai Silver Salmon Runs

Dear Board of Fish Members:

For the past three years, the sockeye salmon run on the Kenai River has been late. Last year I unsuccessfully requested the Department to equitably extend the sockeye personal use fishery on par with the extension granted to commercial fishermen. The denial of that request has impacted the majority of Alaskans who do not have commercial fishing permits or boats, and calls for an equitable, responsible change in policy. Given the Department's preference to extend the season, when escapement is adequate to protect the fishery, for commercial fishermen over individual Alaskans, the Board of Fish needs to adopt a rule that fairly protects all users, including commercial and personal use fishermen who rely on this fishery, while protecting our salmon runs. An extension, of course, should not continue if it endangers Kenai River silver salmon escapement.

As you know, in most prior years the biggest pulse of fish started entering the Kenai River in mid-July, with daily pulses of sockeye in numbers over 100,000, and sometimes 200,000, entering the Kenai on days between July 15th and 17th. The run since 2014 arrived much later. Since 2014, substantial numbers of sockeye salmon have entered the river after the July 31st closure for personal use dipnet fishermen, and escapement, though late, has been vibrant and healthy. At the same time, recognizing no danger to adequate sockeye and silver salmon escapement (the commercial fishery is shut down under current ADF&G policy when silver salmon escapement is endangered), commercial fishing for Kenai River-bound sockeye salmon has been extended past July 31st, to August 6th, 12th and 9th in 2014, 2015 and 2016 respectfully.

There is no biological justification for denying dipnet access to individual Alaskans who seek sockeye salmon, while allowing the commercial fleet sole access to these fish. The commercial fishery is important to Alaskan families, as is the personal use fishery, and leaving the latter open does not materially impact commercial fishermen. Rather, this policy change would reflect the reality of later fish runs, entering the river after the July 31st closure.



I would leave to your expertise how to possibly amend proposals 202 and 203 in order to fairly extend the season in years when significant escapement is projected to go through the first week of August, and recognize that the Department should be able to close the dipnet fishery when it is extended, just as it does now with commercial fishermen, to protect silver salmon runs. Obviously this should occur only in years the Department has projected that its escapement goals will be met to protect the sockeye fishery and sockeye runs into the future.

The City of Kenai should also be given adequate notice of an extension so that it may keep staff hired to run the facilities and operations it engages in, or contracts for, to help run this fishery.

I hope you will issue a policy to allow the extension of the personal use dipnet fishery on the Kenai River in years, and on dates, where we are projected to meet our sockeye escapement goals, can protect the river's returning silver salmon, and in a way that is commensurate with the commercial fishery extension which occurs only when Kenai River sockeye and silvers are protected.

Thank you for your consideration. I have decided against filing legislation on this issue, recognizing that the Board of Fish is the best forum for discussion and debate on these issues.

Rep. Les Gara

A handwritten signature in black ink, appearing to read "Les Gara", with a long horizontal flourish extending to the right.

cc: Alaska Outdoor Council



To Alaska Board of Fish,

This is a letter of opposition to Proposal 201 as it is written, with an alternate solution.

We the undersigned, understand the issues related with Proposal 201. With the Traffic hazards and wetland foot traffic associated with Dip netting, downstream of the Warren Ames Bridge.

However the current Proposal limits all of the Property owners that are downstream of the Warren Ames Bridge. Properties that are located here are outside the Kenai River Special management Area, and have very little impact on the Ecosystem. In fact many locations have stairs and boardwalks to access the river.

We believe that a good compromise would be to only close dip netting from the beach;

From the Warren Ames Bridge downstream, to the section line that marks the end of the Kenai River Special Management Area.

Thank You, for your consideration on this matter,

Richard / Bagley	RICHARD J BAGLEY
Gretchen Bagley	Gretchen Bagley
Shannon L. Dodge	Shannon L. Dodge
Barclay E. Dodge	Barclay E. Dodge
Raymond Topp	Raymond Topp
M. G. C. Mannausau	M. G. C. MANNAUSAU
Daryl Lee Mannausau	Daryl Lee Mannausau
Jack Dean Castimore	Jack Dean Castimore
Aris Lanfear	Aris Lanfear
Scott P. Fock	Scott P. Fock



Submitted By
Richard Person
Submitted On
2/9/2017 11:20:38 PM
Affiliation

Proposal 100 **SUPPORT:** The record shows the early run kings are past the Kasilof section by June 20th and that the Kasilof River historically overescapes. Changing the regulatory language concerning early openings when 50,000 reds are estimated in the Kasilof from "**may** open - to **shall** open" would take the political wrangling out of the discussion and utilize those fish.

Proposals 110,111,112 **SUPPORT: The BOF needs to clarify to enforcement that it's historic intent is that one set net can be fished for one permit in the KRSHA**

Proposal 114 SUPPORT: Set net fishermen close to the KRSHA have been setting up permanent net locations on the north and south front lines of the harvest area. These are the most profitable locations. The KRSHA is open to all fishermen equally. This proposal would level the playing field **by requiring all anchoring devices, buoys lines and nets to be removed during every closure of the KRSHA.**

Proposals 176,177 SUPPORT: Currently in the Chinnok plan when bait is prohibited in the river the whole ESSN fishery is limited to 36 hours a week. These proposals would allow managers more flexibility to fish a section when fish are abundant and not preclude fishing in another section when fish are present there.

Proposal 101 SUPPORT: Adopting this proposal would allow kasilof section setnetters to selectively harvest more kasilof reds within the bounds of their personal, historic site locations. Fishing within 600 feet of mean high water in their traditional areas is safer, more orderly and produces better quality product. Processors are becoming more reluctant to purchase fish harvested in the KRSHA. Not counting the 600 foot openings toward any hourly restrictions in place adds greater flexibility for managers.

Proposal 135 SUPPORT: Dividing the essn fishery into three sections divided by natural occurring boundaries ie, the kasilof and kenai rivers makes sense. The current arbitrary line dividing the Kasilof and Kenai sections, (Blanchard) though a shrewd and profitable achievement for some, can be improved. Any early harvesting of reds in June lost by starting South K beach later on the first of July should be easily compensated by opening the new kasilof section on June 20th. A possible additional benefit is if there are any early run kings lingering around they would most likely be in the south k beach area allowing them to reach the river. This would also give relieve to north k beach.

Proposal 175 SUPPORT: This proposal is intended to correct an oversight by the BOF and the staff when the regulation was adopted. The original regulation was intended to encourage the use of 29 mesh deep nets with the intent of lowering king harvest. Voluntarily with good intent, we cut our nets down to 29 mesh deep. The heart of the regulation was that in certain restricted opening in the Chinook plan, a permit holder could fish 2- 45 mesh deep nets, (a partial complement of gear) or 3- 29 meshdeep nets,(a full complement of gear.) The problem is, a permit holder may choose to divide his full complement of gear into 4- 25 fathom nets instead of the usual 3-35 fathom nets which some do. We were assured by BOF members and department staff that in the final wording of the regulation the 4 nets per permit issue would be clarified, unfortunately, for whatever reason, it was not. As it turned out, this restriction was executed in 2014 and it happened to be our best day of the season and due to clerical oversight we were required to not fish 25% of our gear. That hurt. Please correct this problem by passing proposal 175.



Submitted By
Robert F. Bechtold
Submitted On
1/26/2017 2:13:26 PM
Affiliation

Alaska Board of Fisheries,

Please do consider this request from a lowly recreational fisherman who enjoys fishing on the Kenai Peninsula and Susitna Drainages and dipnetting on the Kenai River annually to provide a sufficient quantity of salmon to augment our family meals.

1. Please do not continue to manage the Kenai River for only one species - sockeye salmon. There are/were other species, such as king salmon and silver salmon, in the Kenai River, which tend to suffer in size and numbers due the great harvest efforts and the reported and unreported by-catch of other species (especially King Salmon) by the commercial fishing fleet. In addition, please be up front with the dipnetters and fisherman. Please consider having closures every Friday 0000 to Saturday 0700, to allow sufficient numbers of salmon to enter the Kenai and Kasilof Rivers, so the efforts by many Alaska families to pack and drive to dipnet can be productive.

2. Please do not open the Ninilchik River for fishing without bait when so few king salmon were returning to the river in mid-June, as was done in 2016. In 2015, opening the king salmon fishing with bait on July 1st was a boon and enjoyed immensely by my family and others on the Ninilchik River. And please do not count the 16-inch jack king salmon to indicate a large return of king salmon to the river.

3. Please do make greater efforts to restore the king salmon runs in the road-accessible Susitna Drainage. The Willow, Sheep, Montana, and other river king salmon runs were very prolific and were quite accessible and productive for the non-boat owner and non-commercial fisherman. My family would greatly appreciate your efforts to restore these king salmon runs.



Submitted By
Ron Maddox
Submitted On
11/15/2016 4:55:25 PM
Affiliation
none

Now facing \$30, 000 bank restoration cost, its very apparent that the increased power boat traffic on the mid-upper Kenai river is increasing at a very fast pace resulting in increased damage to the bank systemk. I would think it would be to everyones benefit to slow the traffic and property damage by declaring the these waters above the Soldotna bridge a designated drift boat fishery like the Kasiloff river. I would suggest this designation extend to Skilak lake outlet. I am cofident the biologist would be able to attest the the advantages of added protection for the fish while allowing continued fishing opportunities in a more responsible fashion. My neighbors of many years are complaining as they have witnessed the dramatic increase of motorized traffic and it direct impact on our river banks. Lets not create another lower river problem.



TO: Alaska Board of Fisheries
Upper Cook Inlet Meeting, February 23 – March 8, 2017
Anchorage, AK

FROM: South Central Alaska Dipnetters Association (SCADA)
February 9, 2017

SCADA Comments on Personal Use proposals for UCI meeting

Proposal 195: SCADA opposes this proposal. While we appreciate the efforts of the city of Kenai to keep the beaches clean, we feel that the Kenai River personal use fishery is extremely important to Alaskan residents. When ADF&G projects that the sockeye run is above 2.3 million, we feel it important that the PU fishery be liberalized just like the other fisheries, sport and commercial. In the past we have observed city crews cleaning the beaches effectively when the EO opened up to 24 hours. Not everyone uses the beaches to dipnet – some folks dip from a boat, others dip in areas outside of the Kenai beaches.

Proposal 196: SCADA opposes this proposal. We feel this is an ill-tempered proposal without justification. Just about anyone who dipnets from a boat ties off their nets to some part of the boat. Obviously, this is just trying to subvert a functional dipnet fishery from a boat.

Proposal 197: SCADA opposes this proposal. Another ill-tempered proposal not based on any biological consideration. Very few people anchor their boats while engaging in the active harvest of fish with a dipnet. In fact, those who do often choke off a pass through point where others are moving through the fishery, so it is typically frowned upon as it can cause a navigation hazard.

Proposal 198: SCADA opposes this proposal. Dipnetters use a variety of mesh sizes accordingly to personal preference, with a focus on what works best to harvest salmon for consumption. This proposal seeks to make the dipnet fishery less efficient, meaning less food in the freezers of Alaskan residents.

Proposal 199: SCADA opposes this proposal. Most people dipnet from the shore at the Kasilof personal use fishery. A few use boats to dipnet. A 10 hp limitation is good for a drift boat exiting downstream from a drift only fishery, but hardly appropriate for powering a boat at the mouth of the Kasilof. If the intent is to close this PU fishery to boats, then be forthright and just submit that proposal. Because that will be the practical effect of this proposal. Under-powered boats can cause navigation hazards to themselves and other boaters, and also may encourage use of very small watercraft which may not be appropriate from which to fish. Too small of craft can be a danger to participants – an underpowered vessel in a tidal area with dipnets is a sure recipe for an accident.



Proposal 200: SCADA is opposed to this proposal. This proposal seems to be attempting to create a regulation where there is not an issue. The only place to retain king salmon in UCI PU fisheries is the Kenai River. In these times of king conservation there is not a clamor from our members to retain more kings than allowed – and we fully support non-retention of kings as a necessary tool if required through paired restrictions.

Proposal 201: SCADA is opposed to this proposal. This proposal seeks to close bank dipnetting from the mouth of the Kenai River up to the Warren Ames Bridge, because of suggested habitat impacts. First, everyone seems to complain that cramming everyone on the Kenai Beach is a problem. But then this proposal seeks to double down on that very approach. Home owners along the South Bank of the Kenai River have long dipnetted from their properties, and some store their boats in this zone also. Quite a few people also like to dipnet from the Warren Ames Bridge area – yes there has been some habitat impacts around the parking area, but these impacts can be mitigated with a bank restoration project, which State Parks is considering. And yes there are walking trails in the areas each summer, but these impacts are temporary in nature and grasses sprout up each spring. Just like the hunting trails that spider through the Kenai Flats each fall from hunting activity. Did ADF&G also put in a proposal to the Board of Game to close the Kenai Flats to hunting because seasonal hunting trails develop each fall? And finally, does anyone think that there are no impacts from the huge icebergs that move back and forth across the riparian habitat each tidal cycle, every day through the winter? A better approach would be for ADF&G work in a constructive partnership with Alaska State Parks to complete bank restoration at the Warren Ames Bridge in a timely manner. This PU fishery feeds a lot of families – probably the largest resident-only fishery in the state. Keep this area open – quit trying to unnecessarily restrict public access for Alaskans to a public resource import as food!

Proposal 202: SCADA is opposed to this proposal. The Kenai Personal Use fishery has set dates to allow Alaskan residents to fish during the peak of the sockeye salmon run. Sockeye are the target fish, and by July 31 the run is typically winding down and other inriver fisheries are getting started, such as the coho fishery. Additionally, kings still entering the river in August tend to be the larger sized breeders, getting ready for spawning that peaks around August 20. Finally, we find on even years, pinks become much more abundant at the end of July. And as August approaches, sockeyes start to become watermarked. So we support the fixed end date of July 31. It provides an orderly transition between fisheries, and provides access in the PU fishery when sockeye is abundant.

Proposal 203: SCADA is opposed to this proposal. We do not support extending the Kenai River PU fishery into August. See reasons in proposal 202.

Proposal 204: SCADA supports this proposal. We support the idea of expanding the area upstream from the Warren Ames Bridge to Cunningham Park to dipnetting from a boat. This area has boat and motor restrictions, as it is in the Kenai River Special Management Area. Boats



that don't meet those restrictions (50 HP, 21-foot length) cannot dip net in the KRSMA. Expanding the area in KRSMA to dipnetting from a boat most likely would reduce the congestion in the lower river from the City Dock to RM4 where KRSMA starts. We would also suggest the idea of restricting very small watercraft also to this area of KRSMA, such as boats 25HP and under. The mix of very large and very small boats creates navigation and safety hazards, and an area separation might be a good way to reduce such hazards.

Proposal 205: SCADA submitted this proposal. When the department liberalizes the Kenai River sockeye sport fishery from 3 to 6 fish, we think that it would be a good idea to liberalize the area upstream to Skilak Lake to bank dipnetting from approved elevated light penetrating walkways on PRIVATE property. This approach can reduce congestion in the current area two-fold – property owners who may take a boat downstream could now dipnet from their own property, if they had made an investment in an ELP. Second, it would allow those property owners without a boat to fish responsibly from their own land, and reduce congestion on the Kenai beaches. Requiring dipnetting only from private property on an ELP would be easy to enforce – if you are not on an ELP, you can't be fishing, and it would not overlap with sport anglers who depend upon public access along the river.

Proposal 206: SCADA opposes this proposal. We would prefer that the area upstream of the Warren Ames Bridge be opened to dipnetting to Cunningham Park from a boat.

Proposal 207: SCADA supports this proposal. A proposal from the department on the PU fishery we support!

Proposal 208: SCADA opposes this proposal. There are size restrictions on Dolly Varden below Skilak Lake, so we don't support targeting Dolly Varden in the PU fishery, especially if our proposal is approved to open the area up to Skilak Lake to bank dipnetting from private property on ELPs when the department liberalizes the sport fishery for sockeye.



Submitted By
Susan Payne
Submitted On
2/9/2017 9:08:26 PM
Affiliation

February 9, 2017

Dear Board of Fisheries,

Word has come to Kodiak that you are being lobbied to take up the Kodiak Salmon Management Plans either at the Cook Inlet meeting in February or the Statewide meeting in March concerning the bycatch of Cook Inlet reds by the Kodiak Fleet. All this based on the Kodiak ADFG Genetics Report. I would like to bring a couple of points to the table to caution you on the conclusions of the report.

First, you will notice that the methods in the genetics report do not specify whether the Kodiak samples came from seiner or setnet fish. By the relative magnitude of the Cook Inlet caught reds as reflected by the bubbles at Kodiak's south end and Kupreanof Bay, it is clear that these were seiner caught samples which I have confirmed with Matt Foster of Kodiak ADFG. Any management decisions should be based on information gained from gear specific sampling.

During the Kodiak meeting, I learned that genetic studies have also been done in Area M and in Cook Inlet. However, those studies did not specify stocks outside of the area of concern noting these as "other". Before we can make solid conclusions about the genetics of catch, we will need a comprehensive and long term genetics study with with standardized methodology that encompasses all these areas at once. Otherwise, based on this limited study, Kodiak may be unfairly punished.

We have fished our setnet site in Kodiak since 2002. The 2014-2016 seasons, the years of the Kodiak genetics study, were non-typical due probably to the unusually warm winters. Fish travelled differently, both in their migratory path and in timing. Fish also came in compressed fluxes and fish sizes were significantly different. In 2015, reds and pinks were smaller than we had ever seen. We watched in dismay as schools of fish passed through our mesh. In 2016, the pinks were few but exceptionally large, with one pink weighing in at 14 pounds. With this cold 2016/17 winter we are hoping for a return to normal patterns of fish distribution, timing, and catch.

In conclusion, the Kodiak Management Plans already take into account the interception of fish going to Cook Inlet...this battle having already been fought. With changing climate, management cannot be an exact science and as setnetters we are trying to be patient with that. Management changes must protect traditional gear types. As stakeholders, we need specific proposals to assess and time to do that. Please postpone this debate.

Respectfully,

Susan Payne

Kodiak, AK



Chairman and Members of the Alaska Board of Fish,

I have fished North Kalifonsky Beach (stat area 244-32) for 28 years. I am in full support of proposal 136, which would give back a small portion of the fishing time that has been taken from this area since the Blanchard Line went into regulation.

This proposal is asking ADF&G to MAY open 244-32, after July 8 with limited gear and area to harvest surplus Kasilof stocks. NKB since before statehood was a harvester of these stocks.

The Kasilof River continually goes over its escapement goal, and the majority of the escapement is made up of smaller sockeye. Please let NKB have a small opportunity to harvest these surplus stocks.

The biggest opponent of this proposal will be setnetters on South Kalifonsky Beach.

No set net fish site before the advent of the Blanchard Line on NKB would have ever traded for a site on SKB. Now SKB gets twice the fishing time, catches twice the kings and reds.

I would hope the BOF would look at this gross inequity and let NKB have a limited opportunity to participate on the TRADITIIONAL Kasilof fishery.

Thank you,

Todd Moore

Soldotna Ak

Box 9162

2/1/2017





Submitted By
Todd O. Moore
Submitted On
2/6/2017 4:10:46 PM
Affiliation
ESSN

Members of the Alaska Board of Fish

I have setnetted North Kalifonsky Beach (NKB) for 28 years. NKB has been severaly impacted with the Late Run King Salmon Managment Plan, when on August 1 the plan goes from an estimated in-river goal to a estimated spawning escapment. This puts all the in river sport harvest directly on the back of ESSN fishermen. I would urge the BOF to take a hard look at this issue and look at passing proposal 165.

I support proposals 112, letting dual se net permit holders to fish both permits in the Kasilof terminal harvest area.

I also support proposal 124, which would loosed some restictions on fishing a very under utilized pink salmon run to the Kenai River.

Thank you,

Todd O. Moore

Submitted By
Todd O. Moore
Submitted On
2/6/2017 3:56:53 PM
Affiliation
ESSN

Members of Alaska Board of Fish,

I have setnetted North Kalifonsky Beach (NKB) for 28 years. I am Set Net permit holder and hold a State of Alaska shore fishery lease on NKB. I have fished 45 mesh deep gear and 29 mesh deep nets. I have found that shallow nets catch less king salmon and still harvest good numbers of red salmon.

If the BOF passed proposal 140, which would let fishermen voluntatily fish 29 mesh deep gear and add on 10 fathoms in lenght, I would changed all my gear. With this change in gear, it would still work in my ADI shore fishery lease. I am positive that my king salmon harvest would decrease and my sockeye harvest would be equivalent to fishing 35 fathom and 45 mesh deep gear.

This is definitty a forward thinking proposal that would save King salmon and still let me harvest red salmon when we are allowed to fish.

Please consider passing proposal 140.

Todd O. Moore



WRITTEN COMMENT Board of Fisheries - Upper Cook Inlet Finfish - Anchorage, 2017

Trevor Rollman - Northern District Setnetter

907-632-8664 rollmat@yahoo.com 3000 S. Saindon St. Wasilla, AK 99623

I give my consent to share my contact info on copies of my Written Comment

These comments will pertain to Proposals 209-218 regarding the Northern District set-net fishery. First, I'll make some general comments and points regarding our fishery in order to provide you with information which should prove pertinent to many, if not all ten of the proposals. Please take these general comments into consideration for all ten of the proposals even if I decline to comment on a specific proposal. Second, I'll give a position on individual proposals with comments specific to that proposal. I may also make reference my general comments and points in the first section.

Please refer to the attached map.

The Northern District is a set-net only fishery. It has traditionally been that way for nearly 100 years and by law for decades. Salmon runs to the Northern District in general, particularly sockeye, have been declining since the mid 80's. I, personally, have made a correlation between this decline and the expansion of the Central District off-shore set net fishery which ballooned in the 1980s. It is no mystery that this, paired with the drift fleet, intercept many salmon bound for Northern District commercial fishermen, sportsmen, and spawning grounds. As a result of this decline, the participation of set-netters in the Northern District has been reduced roughly 75% since that time. Most of those of us who remain are families passing on this historic tradition and life-style to their children and grandchildren. We greatly value this lifestyle and the income it provides, reduced now as it is compared to earlier years. Many of us are working hard to add value through direct marketing to niche markets.

This great reduction in participation in the fishery, coupled with the fact that we only fish two, 12hr periods per week (essentially never - twice since 1989 - being granted extra time by E.O.) results in an extremely low harvest rate of returns to the Northern District streams.

We are a unique fishery. Our season opens early for minimal harvest of Kings and stays open late to allow a minimal harvest of Silvers. The high economic value of this small proportion of the resource is invaluable to our small family operations and is valuable to the local economy, including allowing local processors an early start.

As a general rule, we would simply like to be able to humbly fish our two periods per week. No more, no less. Our best rationale for this is our minimal harvest rates as shown in GSI Data.

General Points Applicable to More Than One Proposal

1. Minimal Harvest Opportunity

a. Regular Season (June 25 - Closure) Two(2) 12-hour periods per week. That is 24 hrs fishing in a 168 hr week. **Fish pass through the N.D. untouched at least 144 of 168 hrs per week. 6/7 of the season.** Also, during open hours low tide prohibits fishing for hours for many fishermen.

b. King Season (Beginning Memorial Day - Regular Season) One(1) 12-hour period per week. 12 hrs fishing out of 168 hrs in a week. **Kings and early Sockeye pass untouched at least 156 of the 168 hours in a week.** Low tides exacerbate these hours.

2. Minimal Harvest

- a. Avg. Sockeye harvest rate by N.D. set-netters of Susitna drainage stocks, 2006-2013: **1.68%**
- b. Chinook harvest rate of N.D. stocks over roughly same time period: **0.5% - 1.5%**



***NOTE:** These first two are my most emphatic and universal points in my defense of Northern District set-netters. I can not stress enough the relevance of this as an argument against anyone who would say that we have "liberal" harvest opportunity (several of these proposals). The Department of Fish and Game has said that Northern District set-netters are "STATISTICALLY INSIGNIFICANT" (emphasis mine) when it comes to our miniscule impact on N.D. salmon stocks. Northern District set-netters are painted and perceived as massive over-consumers, the greediest of the bad guys. The reality is we are a small, traditional user group with a nearly imperceptible affect to escapements, yet giving a nice boost to the local economy.

3. Paired Restrictions are Dangerous and Inappropriate for the Northern District

Most paired-restriction proposals seek to tie a sport-fishing restriction on a certain stream system of group of streams to closure or severe restriction of an entire fishery - the whole Northern District. This sort of pairity is not fair and does not make sense.

4. Permanent Elimination of a Fishery - Extreme, Restrictive to ADF&G

Permanent closure of a fishery or season based on recent year's return fluctuations is not the right way to handle it. If escapement goals are not being met, ADF&G can use its Emergency Order authority to restrict that fishery or season, closing it for the season if that is necessary. Permanent elimination of the fishery/season would take that management tool away from the Department.

Comments on Specific Proposals

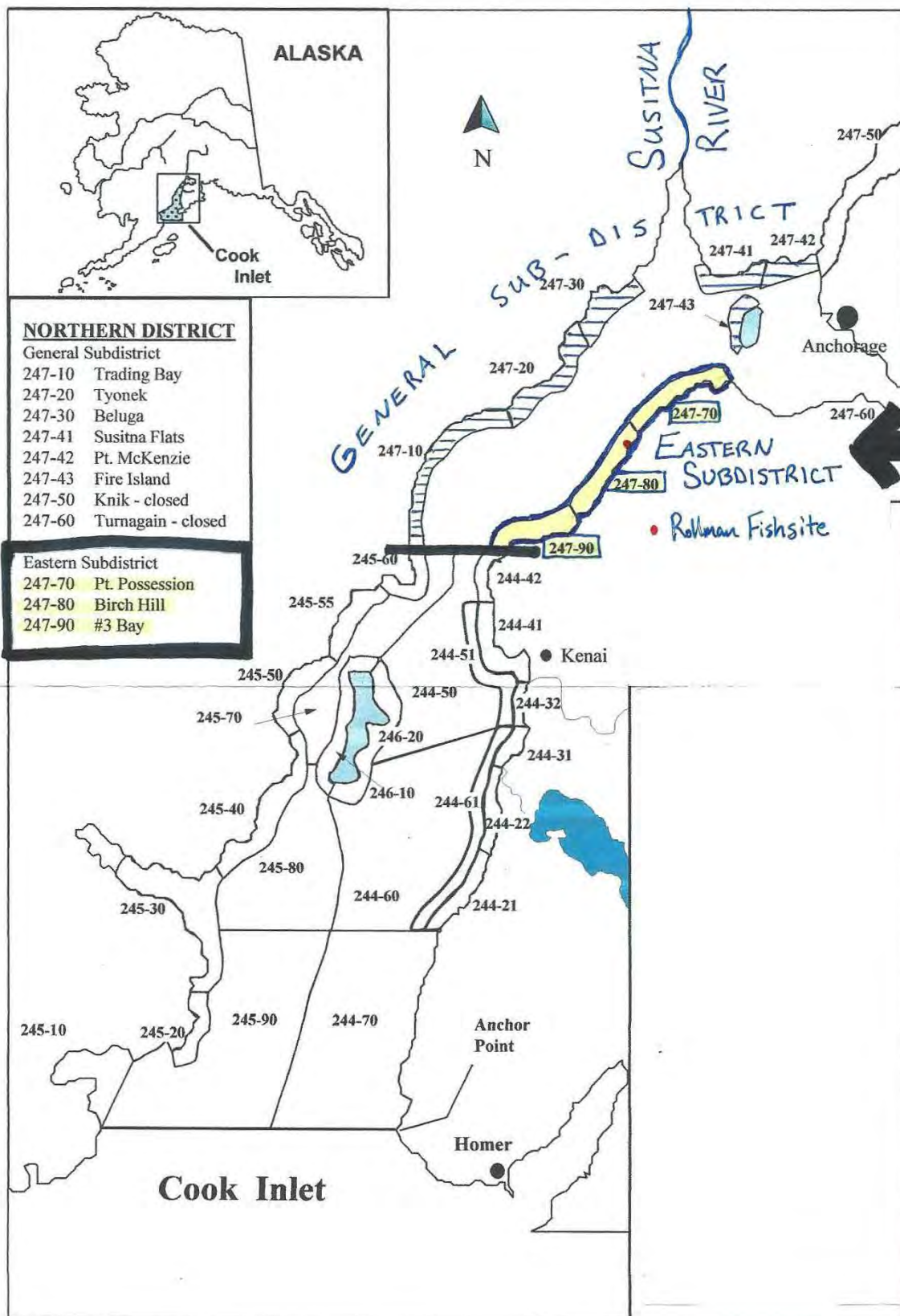
209 - Opposed. (General Points 1b, 2b, 4) This would result in the loss of an early economic resource available nowhere else in Cook Inlet. We catch not only a small number of kings but also some early reds. The price for these sought-after early fish is high and is a benefit to many locally. Please don't permanently eliminate a fishery.

211 - Opposed. (General Points 1b, 2b, 3) This is already a severely limited fishery. One 12 hr period per week. The Department has also shown that they will use E.O. authority to restrict this fishery even more when necessary. E.O.s have been issued in years past to completely close a period and or restrict some or all of our king periods to 6 hrs. A 6 hr opener is sometimes impossible to fish because of the timing of the tides.

212 - Opposed. (General Points 1a, 4) Section (a) of the Northern District Salmon Management Plan does state that one of its purposes is to "minimize" the harvest of Northern District coho. That purpose is then expressly met within the plan in section (d). Coho take is minimized through prohibiting the Department from granting additional fishing periods other than the two regular weekly periods either (1) when coho are projected to be the most abundant species, or (2) after August 15th. See **5 AAC 21.358** (d)(1)&(2). Based on our 24/168 hrs fished per week and the low participation rate which is even lower this late in the season, our harvest IS minimized already. The economic value of these fish go up later in the season; a boost to local economy. See comments on 209. We highly value these fish at the tail ends of our traditional fishery.

213-216 - I don't support these proposals in solidarity for fellow set-netters. It would not be right to eliminate their shore-fishery leases. Also see my general comment on pairity, 3. Also remember that this is one (kings) or two (silvers) 12 hr period(s) per week, not "liberal" harvest as is stated.

218 - In Favor. This proposal seeks to make the letter of the law match the original intent. The intent of stacking permits was to allow two sets of gear to be fished in one person's name. The current wording of this regulation makes that confusing. The proposed re-wording makes it clear.





United Cook Inlet Drift Association

43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438
• info@ucida.org •

February 9, 2017

Mr. Glenn Haight, Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Board of Fisheries Comment for Upper Cook Inlet Finfish Meeting

Commercial fishing groups in Upper Cook Inlet were compelled to use the courts to enforce Federal law regarding salmon management due to an improper delegation of authority to the State of Alaska and the National Marine Fisheries Service's (NMFS) abdication of their responsibility. On September 21, 2016, a three judge panel of the Ninth Circuit Court ruled unanimously in favor of the fishing groups.

The Court held that the Magnuson-Stevens Act (MSA) unambiguously requires a Regional Fishery Management Council to create a Fishery Management Plan (FMP) for each fishery under its authority that requires conservation and management. The panel further held that the Magnuson-Stevens Act allowed delegation to a state under the FMP, but did not excuse the obligation to adopt an FMP when a Regional Fishery Management Council opted for state management.

In order for NMFS to delegate management authority of the Cook Inlet Salmon Fishery to the State of Alaska, the state's management measures must be consistent with the MSA, the Ten National Standards, Essential Fish Habitat (EFH) requirements and other applicable federal law. For this transition to be as seamless and as orderly as possible, we encourage the Board of Fisheries to move towards compliance with the MSA at this 2017 UCI meeting.

The salmon resources in the Cook Inlet watershed are facing accumulating threats to their survival and some stocks are in decline from the effects of climate change, warm water, invasive species, urbanization and management schemes based on faulty or incorrect data. We need to utilize the best available science on these and other issues to ensure the sustainability of these resources, and the economies that are built on the harvest of surplus salmon stocks.



UCIDA has six proposals before this Board for consideration during the Upper Cook Inlet finfish meeting. Five of our proposals directly address 3 major problems in the UCI commercial salmon fishery:

- Regional managers are not currently able to manage the fishery to meet sockeye escapement goals because of prescriptive management regulations;
- Various escapement goals for the Kenai River are conflicting, confusing, and/or unsustainable;
- Sockeye, chum, pink and coho salmon species are under-harvested.

These management problems are the result of regulations that do not comply with the 10 National Standards under the Magnuson-Stevens Act.

Our proposals number 89, 90, 94, 117 and 129 address:

- Repealing mandatory time and area restrictions during July, including those based on the Susitna Sockeye stock of yield concern and the Susitna Sockeye Salmon Action Plan;
- Repealing the 1% rule;
- Repealing the Kenai River late-run sockeye Optimum Escapement Goal (OEG);
- Incorporating a provision for harvesting surplus salmon stocks into the considerations required for developing the Upper Cook Inlet Management Plan.

The MSA requires the use of best available science. The most recent scientific data from ADF&G has refuted flawed assumptions or faulty data that were used to justify mandatory time and area restrictions, the 1% rule and the use of the OEG. All of our scientifically based proposals above would move the fishery towards the goal of achieving maximum sustained yield.

Our proposals each have their detailed explanations in the proposal book. We are providing a broader overview of the systemic problems in the balance of this document.

Under-utilization of sockeye salmon

For the 6th consecutive year, the sockeye in-river goal in the Kenai River has been exceeded. In four of the five past years, the sockeye escapement goal in the Kasilof River has been exceeded. This systematic over-escapement has two significant negative effects. First, surplus salmon go unharvested (See Fig. 1), failing to achieve optimum yield and reducing the economic value of the salmon harvest to the industry, and regional and state economies (See Fig 2). Secondly, future salmon production is negatively affected by the over-escapements, decreasing the economic value of the salmon harvest in future years. These consequences are well documented in literature and in the long term data set for Cook Inlet.

Over the past three decades, the Kenai River sockeye escapement has tripled. In 1985, the escapement goal range was 350,000 – 500,000. Currently, the goal range is 1 - 1.2 million. During this time period, the average Kenai sockeye run size has decreased by 30%.

Fig. 1 Sockeye Escapements and Surplus 2011-2016

Year	Kenai River				Kasilof River		
	Inriver Goal* (Thousands of Sockeye)	Sonar Count (Thousands of Sockeye)	Est. Pounds Over Midpoint of Goal		Escapement Goal (Thousands of Sockeye)	Sonar Count (Thousands of Sockeye)	Est. Pounds Over Midpoint of Goal
2011	1,100-1,350	1,599	2,431,000		160-340	245	-
2012	1,100-1,350	1,582	2,428,000		160-340	375	705,000
2013	1,000-1,200	1,360	1,638,000		160-340	490	1,520,000
2014	1,000-1,200	1,525	2,635,000		160-340	440	1,093,000
2015	1,000-1,200	1,703	3,317,000		160-340	470	1,119,000
2016	1,000-1,200	1,384	1,647,000		160-340	240	-

This table includes only the Kenai and Kasilof sockeye runs because they are the only runs that are enumerated in a comprehensive way. The sockeye salmon in Upper Cook Inlet (UCI) that are returning to other systems may also be experiencing similar effects.

*5 AAC 39.222 (6)(f)(19) “inriver run goal” means a specific management objective for salmon stocks that are subject to harvest upstream of the point where escapement is estimated: the inriver run goal will be set in regulation by the board and is comprised of the SEG, BEG, or OEG, plus specific allocations to inriver fisheries.

When a goal is expressed as a range, the midpoint is the target. Over the years, the actual escapement should range both below and above the midpoint. If the goal range is consistently exceeded then the management objectives are not being met.

The chronic over-escapements shown in Figure 1 add up to hundreds of thousands of sockeye salmon and millions of pounds. This is salmon that is surplus to spawning needs, and it is being wasted. Commercial fishers were prevented from catching them, personal users and sport fishers did not catch them. The local and state economies were deprived of the benefit of the \$66 million value of these fish.

Fig. 2 Ex-vessel Value of Surplus/Unharvested Kenai & Kasilof Sockeye 2011-2016

Year	Est. Lbs. Over Midpoint of Goal	Avg. Commercial Price/lb. for Sockeye	Est. Ex-Vessel Value of Surplus - Unharvested Sockeye	Surplus/Unharvested as Percentage of Actual Harvest
2011	2,431,000	\$1.50	\$3,646,500	10.10%
2012	3,133,000	\$1.50	\$4,699,500	21.00%
2013	3,158,000	\$2.25	\$7,105,500	26.90%
2014	3,728,000	\$2.25	\$8,388,000	36.50%
2015	4,436,000	\$1.60	\$7,097,600	44.30%
2016	1,647,000	\$1.50	\$2,470,500	11.9%
Total	18,533,000 lbs		\$32,964,000	
Estimated First Wholesale Value Loss				- \$66,000,000

How and why is this \$66,000,000 economic loss happening?

The Board of Fish (BOF) has adopted salmon management plans for Upper Cook Inlet (UCI) that have become overly complex and cumbersome creating conditions where managers find it impossible to respond to real-time salmon run events. Adaptive management practices have been largely abandoned by the BOF in favor of highly prescriptive plans. In 2015, local biologists had to request a legal opinion prior to making management decisions during the salmon season.

The Kenai River is the only river in the state to have five different sockeye salmon goals. These goals are confusing to the public and fishery managers. There are disagreements between the commercial and sportfish divisions within ADF&G over which goals should be used when making in-season management decisions. The goals are often conflicting during the season due to misinterpretations and the uncertainties and often daily variations in the estimates of run timing, run strength and harvest rates. The “Optimum Escapement Goal,” or “OEG” for Kenai River late run sockeye exceeds the SEG. The misnamed OEG is also inappropriate to use for inseason management because the sport harvest must be counted prior to determining if the goal was met or missed, but the sport harvest isn’t known until 18 months after the season ends. The Kenai River OEG is incompatible with the findings of both of the latest ADF&G escapement goal reviews; it is confusing, redundant, conflicting and should be repealed.

Fig. 3 Kenai River Escapement Goals

Biological Escapement Goal (BEG)	600,000 - 900,000
Sustainable Escapement Goal (SEG)	700,000 - 1,200,000
In-River Goal (IRG) (by run size)	<p>< 2.3 mil: 900 - 1,100,000</p> <p>2.3 - 4.6 mil: 1,000,000 - 1,200,000</p> <p>> 4.6 mil: 1,100,000 - 1,350,000</p>
Optimum Escapement Goal (OEG)	700,000 - 1,400,000
<p>* The In-River Goal includes an allocation for in-river users that ranges from 200,000 to 650,000 depending on sockeye run size to the Kenai River. These large allocations cannot be harvested in-river without damaging critical salmon habitat.</p>	

Under-utilization of coho, pink and chum salmon

Similar factors are causing a gross underutilization of coho, pink and chum salmon in UCI. To realize the full economic benefit of our salmon resources, ADF&G and the BOF need to carry out their mission to return to maximum sustained yield management (MSY) for all salmon species in Cook Inlet.

In 2002, ADF&G conducted a marine tagging project designed to estimate the total population size, escapement, and exploitation rates for coho, pink and chum salmon returning to Cook Inlet (Willette et al. 2003). This study estimated the harvest rate of coho salmon in the commercial fishery at about 10% of the total run, the harvest rate of pink salmon in the commercial fishery at about 2% and the harvest rate of chum salmon in the commercial fishery at about 6%. (The harvest rate of coho was actually less than 10% because this project ended before the Kenai coho run started.)

Fig. 4 Average and Annual Number of UCI Salmon Commercially Harvested

	Coho	Pink	Chum
1975 - 1984	363,000	730,000	833,000
1985 - 1994	506,000	397,000	441,000
1995 - 2004	222,000	209,000	178,000
2005 - 2014	171,000	247,000	123,000
2014 Harvest	137,376	642,879	116,093
2015 Harvest	216,032	48,004	275,960
2016 Harvest	147,469	382,436	123,711

In Figures 5, 6 and 7 escapement needs and harvests by various user groups are shown for coho, pink and chum stocks. The data set is from 2014. Escapement needs are from ADF&G sources. Escapements are estimated for stocks with no established escapement goals, based on Willette et al. 2003.

Figure 5. Distribution of the 2,750,000 Coho Run in Upper Cook Inlet, 2014

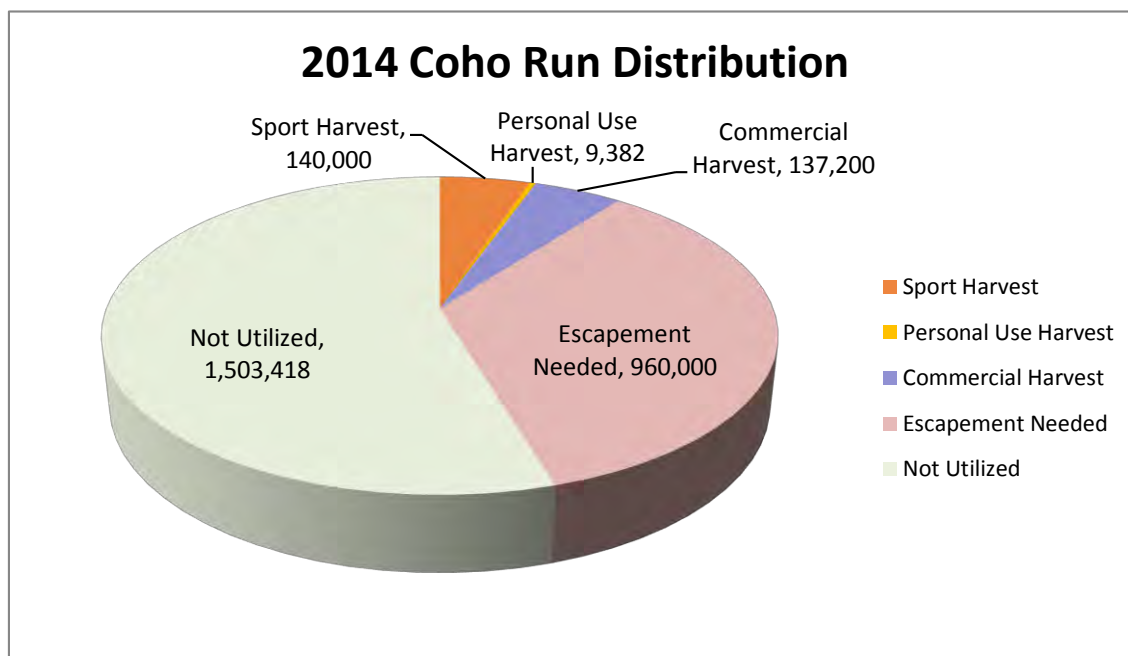


Figure 6. Distribution of the 20,000,000 Pink Run in Upper Cook Inlet, 2014

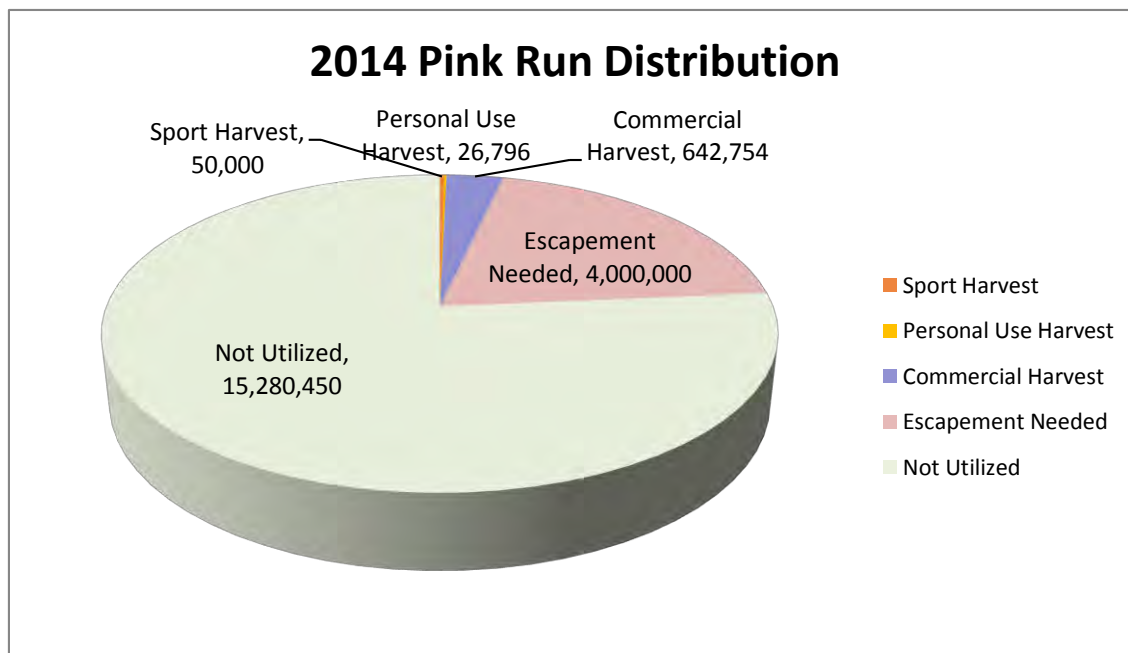
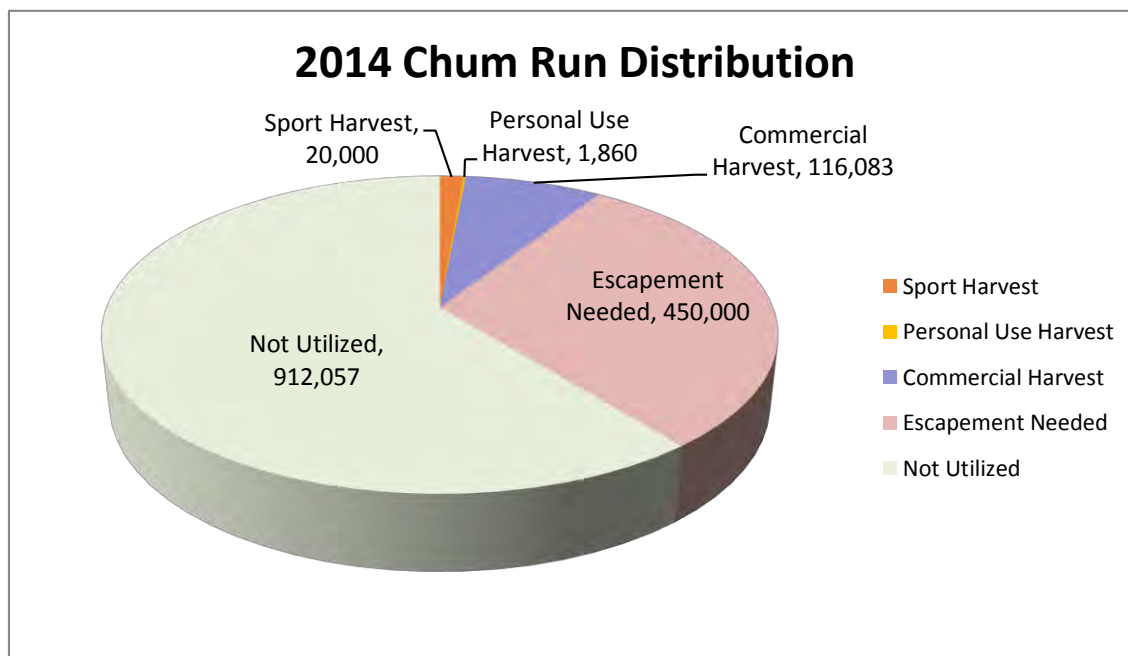


Figure 7. Distribution of the 1,500,000 Chum Run in Upper Cook Inlet, 2014



Summary of under-utilization of salmon – see Figure 8.

- About 30,000,000 salmon returned to UCI streams and rivers in 2014. These salmon returns to UCI are some of the largest wild, native returns in Alaska. After escapement needs (7,000,000), there were approximately 23,000,000 salmon available for harvest. Of the 23 million salmon available for harvest, only around 4.5 million were utilized.
- If harvested in the commercial fishery, the 23 million salmon would be worth over \$150 million dollars at the First Wholesale Value level.
- Non-utilized/unharvested describes those salmon in excess of escapement needs that have gone past the commercial, sport and personal use fisheries.
- These abundant salmon stocks should be available for harvest; however, the effects of current BOF and ADF&G management plans and policies result in over 80% of these stocks going unharvested. Specifically, 87.6% of the Chinook, 18.8% of the sockeyes, 84.0% of the coho, 95.5% of the pinks and 86.9% of the chum salmon stocks swim through UCI untouched.
- The non-utilized stocks represent millions of lost tax revenue dollars to the State Treasury, tens of millions of dollars in lost economic benefit to the regional economies, loss of food products and by-products, and lost jobs. These same non-utilized salmon represent an opportunity for growth and diversification in local, regional and state economies.
- The commercial sector is the only user group that has the capacity or the ability to harvest and monetize these surplus stocks.



Figure 8. Summary of all under-harvested stocks

2014 Upper Cook Inlet Salmon Stock Status & Harvest						
	Chinook	Sockeyes	Coho	Pink	Chum	Total - All Species
Total Run	250,000	5,500,000	2,750,000	20,000,000	1,500,000	30,000,000
Less Escapement Needed	(100,000)	(1,500,000)	(960,000)	(4,000,000)	(450,000)	(7,000,000)
Available Harvest	150,000	4,000,000	1,790,000	16,000,000	1,050,000	23,000,000
Commercial Harvest	4,600	2,343,032	137,200	642,754	116,083	3,243,669
Percentage	3.1%	58.6%	7.7%	4.0%	11.1%	14.1%
Sport Harvest	18,750	397,985	140,000	50,000	20,000	626,735
Percentage	12.5%	9.9%	7.8%	0.3%	1.9%	2.7%
Personal Use	50	506,079	9,382	26,796	1,860	544,167
Harvest Percentage	0.0%	12.7%	0.5%	0.2%	0.2%	2.4%
Total Harvest(s)	23,400	3,247,097	286,582	719,550	137,943	4,414,572
Percentage By Species	15.6%	81.2%	16.0%	4.5%	13.1%	19.2%
Unharvested	126,600	752,903	1,503,418	15,280,450	912,057	18,585,428
Percentage by Species	84.4%	18.8%	84.0%	95.5%	86.9%	80.8%



Submitted By
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Submitted On
1/20/2017 7:26:13 PM
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Sir:

I have been looking at the subsistence proposal on 204 which would extend the dip netting area up the Kenai River to Cunningham park.

As I am sure you are aware, the dipnet fishery creates a disaster on the beach in the present dip netting area caused by those that have no regard for the mess they leave when finished.

. I live three houses up from the Kenai River Bridge and four houses down river from the Cunningham park and fear for the garbage and the damage to my river bank that is very sensitive to the environment. With this proposal being from boats only, We know that when nature calls the bank of the river is where they will go to take care of business or cleaning of their fish. During high tide the river bank has been a continual challenge for me fighting the loss of the bank which will be accerelated problem with the extra foot traffic. I have lived at this residence for 37 years and do not want to think of the destruction this proposal 204 would create.

In addition to this problem that would be created, Cunningham park is not designed for the heavy use that this would bring.

Please consider that the little bennefit this might give to dipnetters, the damage would be a disaster to the environment.



Submitted By
Winton Voetmann
Submitted On
2/7/2017 4:17:33 PM
Affiliation
Alaskan

I believe that whenever there are sufficient numbers of Kenai River reds to allow for commercial fishing, then Alaskan personal use dipnetters should also be allowed to fish.