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

Eskelin, pg 34:

\[ .687 \text{ (Kenai-bound fraction)} \times \left( \frac{678 \text{ (3 year-olds)} + 1298 \text{ (4 year-olds)}}{19,711 \text{ (total run)}} \right) = 0.0688 \text{ of the total Kenai River late-run} = 6.9\% \]

Regs, pg 9

GENERAL REGULATIONS

Inclusive waters: The mainstream Kenai River from its mouth, devoted 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 decaled to prevent measurement until the fish has been permanently offloaded from a boat or removed from the river bank 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, Anchor Arm, 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 28 inches or longer that is released 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 the 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 Kalifovsky Beach Road, Soldotna, Alaska. (907) 262-9148.
- Kenai River mouth upstream to 300 yards below Skilak 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 Skilak 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, 1 in possession, in combination with coho (in season), sockeye, chum, or pink salmon less than 16 inches in length (see table below).

---

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. The 1 fresh-water year is implied.

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. 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.

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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." 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 $a_2$ age format can also be expressed as $4_{\text{sub}2}$. 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.\(^\text{66}\)

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

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\(^{66}\) 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.\textsuperscript{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

Because on average even tributary spawners mill in-river for 33 days up to 67 days,\textsuperscript{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.\textsuperscript{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).\textsuperscript{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.
ADF&G currently assumes a 6.4% catch-and-release mortality rate, averaging only the 1990-91 studies.\textsuperscript{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.

\textsuperscript{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 (0.064);

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.\footnote{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%)}

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,
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.

The will 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.

2/1/2017
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 ¾ in or smaller), whenever the Kasilof section is open for Emergency Opener’s to harvest Kasilof 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
Proposed 13.6

Beach Sections and Expanded Corridor

Upper Cook Inlet

Breakdown of Statistical Areas for Set-nets and the Expanded Corridor

North Kalitansky Beach 244-32 / South Kalitansky Beach 244-31
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, 50% or higher of Kasilof sockeye, where harvested in the North K-Beach sections.
Figure 6.–Stock composition estimates for the Kasilof and Kenai/EF sections set gillnet fisheries (Central District, Upper Subdistrict) divided into subsections from 2009.

Note: There are 2 subdistricts for each section and they are displayed from south to north.

In 2009 close to 50% of the North-K-Beach harvest was comprised of Kasilof Sockeye.


Gail Hollier 136 Proposal
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<th>Percent</th>
<th>Cum Percent</th>
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<td>99.6%</td>
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Kiss Salon Beach harvested from 1999-2016.

MKB harvested at all of Kiss Salon Beach.

All of Kiss Salon Beach harvested from 1999-2016.

Kiss Salon Beach harvested in 2003.

35% harvested in 2003.
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<th>North Kalifonsky Beach</th>
<th>rods harvied</th>
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<tbody>
<tr>
<td></td>
<td></td>
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<td>2,127,955</td>
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The total harvest on all Kalifonsky Beach was 5,876,196

\[
\frac{2,127,955}{5,876,196} \times 100\% = 36\%
\]

NKB harvested 36% of all red salmon harvested on all
of Kalifonsky Beach 1999-2016

Gary L. Hollmer
Proposal 136
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There was a total harvest on all Kalifonsky Beach of 5,876,196 reds from 1999-2016.

3,748,235 - SKB (64%)

5,876,196 - All KB (100%)

South Kalifonsky Beach - 344-31

3,748,235 reds harvested 1999-2016

SKB harvested 64% of all red salmon harvested on All of Kalifonsky Beach.
1999-2016

South Kalitansky Beach
244-31 SKB

33,373 Kings Harvested

From 1999-2016 there were 51,403 King Salmon harvested on all Kalitansky Beach.

33,373 - SKB 65%
51,403 - All KB 100%

SKB Harvested 65% of all King Salmon on Kalitansky Beach 1999-2016

Caryl L. Hallier
Proposal D6
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Terminal: 69.5%
**All ADF&E Data**

**Kasilof River - Escapement**

6,333,068 - Total Escapement in Kasilof River 1999-2016

3,891,227 - Age 2 Ocean Fish & Younger - 61.94%

**Kasilof River Escapement - 1999-2016**

3,891,227 - Age 2 Ocean Fish & Younger

6,333,068 - Total Escapement in Kasilof River

**Kasilof Terminal Fishery Age Comps 2004-2008**

615,026 - Age 2 Ocean Fish & Younger

888,377 - Total Harvest

69.23%
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 existing 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
Dear Chairman Jenson 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 escapement of king salmon into the Kenai River 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 Kenai River.

Thank you,

Gary L. Hollier
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.
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
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 depnetters 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.”
As a life long Alaskan, I urge you to move forward with the Northern Cook Inlet safety zone & the Kenai river harvest zone.
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
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 subsistance regulations (ANILCA). If dipnetters have restrictions of Alaska residents only, why not the commercial fisheries?
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.
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,

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission
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
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,

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission
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,

Jim Colver
Former Vice-Chair, Mat-Su Borough Fish & Wildlife Commission
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 comming 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
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.
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
907-586-8212
Email
sojohn61@hotmail.com
Address
329 Fifth Street
#1
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!
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.
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
Oct 28, 2016

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.
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 mouthlip 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.


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
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 and provide additional fish for harvest to other anglers.

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 Kasilof 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 Kasilof 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/Arcitic char per household in Cook Inlet Personal Use Fisheries.

We oppose this proposal.
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 mainstem 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 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
targets of selective harvest. See the above proposal 156 for more reasoning on why we should do all we can to protect our larger and older age class fish.

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 to 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.
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, crewwembers, 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
Kasilof River Special Harvest Area. SUPPORT We believe that one net per permit was the original intent of the regulation.

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 in-season 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 in-season 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 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. 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, 1501 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 Kasilof 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
Gary Chamberlain
Submitted On
2/9/2017 4:24:09 PM
Affiliation
Kenai River Professional Guide Association

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Email
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PO Box 3674
Soldotna, Alaska 99669

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”).

<table>
<thead>
<tr>
<th>KRSA Proposals</th>
<th>Pg.</th>
</tr>
</thead>
<tbody>
<tr>
<td>#103 Expand use of Kasilof windows</td>
<td>15</td>
</tr>
<tr>
<td>#127 Correct Kenai sockeye inriver goals &amp; clarify priority</td>
<td>18</td>
</tr>
<tr>
<td>#141 Limit set gillnet mesh depth</td>
<td>12</td>
</tr>
<tr>
<td>#149 Revamp Kenai Early-run King Salmon Management Plan</td>
<td>21</td>
</tr>
<tr>
<td>#162 Establish Optimum Escapement Goal for Kenai late-run king salmon</td>
<td>14</td>
</tr>
<tr>
<td>#191 Increase Kenai coho Salmon bag limit from two to three</td>
<td>24</td>
</tr>
<tr>
<td>#204 Extend upstream boundary of Kenai personal use boat fishery</td>
<td>26</td>
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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>
<thead>
<tr>
<th>Run size</th>
<th>Lower</th>
<th>Upper</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEG</td>
<td>--</td>
<td>700,000</td>
</tr>
<tr>
<td>OEG</td>
<td>--</td>
<td>700,000</td>
</tr>
<tr>
<td>Inriver goal (at sonar)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt; 2.3 million</td>
<td>900,000</td>
<td>1,100,000</td>
</tr>
<tr>
<td>2.3 – 4.6 million</td>
<td>1,000,000</td>
<td>1,200,000</td>
</tr>
<tr>
<td>&gt; 4.6 million</td>
<td>1,100,000</td>
<td>1,350,000</td>
</tr>
</tbody>
</table>

*Table 1. Kenai Late-run sockeye salmon goals.*
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.

<table>
<thead>
<tr>
<th>Inriver</th>
<th>ESCAPMENT GOALS</th>
<th>PROJECTED ESCAPEMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tier 1</td>
<td>900,000 1,100,000</td>
<td>680,000 850,000</td>
</tr>
<tr>
<td>Tier 2</td>
<td>1,000,000 1,200,000</td>
<td>760,000 930,000</td>
</tr>
<tr>
<td>Tier 3</td>
<td>1,100,000 1,350,000</td>
<td>850,000 1,060,000</td>
</tr>
</tbody>
</table>

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).

<table>
<thead>
<tr>
<th>Tier</th>
<th>Inriver goal</th>
<th>Harvest</th>
<th>Escapement</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lower</td>
<td>Upper</td>
<td>Lower</td>
</tr>
<tr>
<td>Opt.A</td>
<td>900</td>
<td>1,250</td>
<td>220</td>
</tr>
<tr>
<td></td>
<td>1,100</td>
<td>1,450</td>
<td>250</td>
</tr>
<tr>
<td></td>
<td>1,300</td>
<td>1,750</td>
<td>280</td>
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<td>250</td>
</tr>
<tr>
<td></td>
<td>1,300</td>
<td>1,750</td>
<td>280</td>
</tr>
</tbody>
</table>

**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](image)

**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](image)

**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.