

RC

**Regarding Proposal 32 and RC 35
Submitted by CDFU**

We propose maintaining the current Copper River King Salmon Escapement goal which reads as follows:

The current regulation in the 5 AAC 24.361 Copper River Management Plan states: (a) The department shall manage the Copper River commercial, sport, personal use, and subsistence fisheries to achieve a sustainable goal of 24,000 or more for King salmon. For the purposes of managing these fisheries, the department shall consider the best available information regarding harvest, age composition, and escapement, including escapement information obtained from mark-recapture studies, aerial surveys, or by other means.

Proposed Escapement Goal

ADF&G's *Review of Salmon Escapement Goals in the PWS Management Area* (published at the Anchorage BOF workshop in October 17-19, 2017) seeks to create and implement an SEG range of 18,500 – 33,000 chinook. (See ADF&G Memorandum, RC 6.)

RC 35 proposes an OEG of 25,750 - 33,300 for king salmon.

An OEG should not be put into place for the following reasons:

Best Available Science

SEG's are scientifically defensible. The proposed OEG is not scientifically defensible and was proposed without the support of compelling data or scientific evidence. Therefore, it is incumbent upon the Board to reject this OEG, which would significantly limit the Department's ability to manage based on best available science.

If the proposed OEG is approved, we are effectively removing science and the department's scientific analysis from the Copper River King Salmon Management Plan. ADF&G has the authority to manage based on best available science and react to in season changes. That authority must be protected, due to the simple fact that user groups and the Board of Fisheries are not engaged in daily scientific analysis in the region; that is ADF&G's job.

Burdensome to User Groups and ADF&G Management Tools

An OEG by definition attempts to take into account allocation for user groups. However, without a way evaluate in season run entry and harvest volume up river it would be impossible for ADF&G to manage for this goal. This would place unreasonable burdens upon user groups who are facing lost opportunity.

Furthermore, all Alaskans who fall within the user groups in the Copper River Watershed are now without adequate notice and proper process participatory opportunities as a result of RC 35

As further advances allow the department to differentiate kings from reds with sonar the current escapement goal may bear revisiting. Until that time we would like to continue with the current king salmon management plan SEG.