Kenai River Late-Run Sockeye Salmon Management Plan (16 proposals)

PROPOSAL 88

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to increase inriver goal ranges, as follows:

Inriver goal ranges are designed to distribute escapement throughout the SEG according to run size with allowances for sport harvest upstream from the sonar. Sport harvest above the sonar currently ranges from about 200,000 to 400,000 per year depending on the number of sockeye available in river. Higher harvest levels from 250,000 to 500,000 can be expected in the upstream sport fishery with the higher fishing effort expected to accompany consistently higher sonar counts. Proposed revisions of inriver goals are as follows:

Run strength	Old	New
< 2.3 mil	900,000 – 1,100,000	1,000,000 – 1,400,000
2.3-4.6 mil	1,000,000 – 1,300,000	1,200,000 – 1,600,000
> 4.6 mil	1,100,000 – 1,500,000	1,400,000 – 1,800,000
		1,400,000 – 2,000,000*

* *Proposed Optimum Escapement Goal in years of Kenai late-run sockeye run sizes greater than 5 million.*

Proposed goals are derived as follows:

- Low end is based on SEG (750,000) plus 250,000 sport catch at low run size.
- High end is based on SEG (1,300,000) plus 500,000 sport catch at high run size.
- Tier widths are 400,000.

Proposed goals address two issues with the previous tiers which have developed over time.

1. The top end goals translate into escapements below the SEG due to growth in the sport fishery upstream from the sonar.
2. Narrow goal ranges are not practical to achieve given variable and uncertain run assessments.
3. The higher top end inriver goal during very large Kenai run sizes recognizes new information on high yields from large escapements and is designed to avoid overharvest of other Chinook and coho stocks in mixed stock commercial fisheries during years of high sockeye abundance.

What is the issue you would like the board to address and why? Recent data on production from large escapements of Kenai River late run sockeye indicates that maximum sustained yield is produced at levels greater than previously thought. Accordingly, ADF&G has recently increased the SEG from 700,000 – 1,200,000 to 750,000 – 1,300,000. The ADF&G analysis actually indicated that maximum yield is produced by escapements around 1.2 million but the escapement goal review committee elected to make only a modest increase in the SEG from previous levels. Inriver goal ranges, as measured in the Kenai River Late-run Sockeye Management plan are based on the SEG and need to be revised accordingly.

PROPOSED BY: Kenai River Sportfishing Association (HQ-F19-121)
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PROPOSAL 89

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to manage primarily for sport, personal use and guided sport anglers and increase the sustainable escapement goal range to 1,300,000-1,750,000 salmon, as follows:

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan

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

(b) The Kenai River late-run sockeye salmon commercial, sport, and personal use fisheries shall be managed to (l) meet the sustainable escapement goal (SEG) **range of 1,300,000-1,750,000** [700,000- 1,200,000] late-run sockeye salmon; (2) achieve inriver goals as established by the board and measured at the Kenai River sonar counter located at river mile 19; and (3) distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run.

(c) Based on preseason forecasts and inseason evaluations of the total Kenai River late-run sockeye salmon return during the fishing season, the run will be managed as follows:

(l) at run strengths of less than 2,300,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of **1,300,00 – 1,750,000** [900,000 – 1,100,000] sockeye salmon past the sonar counter at river mile 19; and

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, unless the department determines that the minimum inriver goal will not be met, at which time the fishery shall be closed or restricted as necessary; [THE COMMISSIONER MAY, BY EMERGENCY ORDER, ALLOW EXTRA FISHING PERIODS OF NO MORE THAN 24 HOURS PER WEEK, EXCEPT AS PROVIDED IN 5 AAC 21.365;]

(2) at run strengths of 2,300,000 - 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of **1,300,000-1,750,000** [1,000,000 - 1,300,000] sockeye salmon past the sonar counter at river mile 19 **between July 1 and August 14**;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than **24** [51] hours per week, except as provided in 5 AAC 21.365; [AND

(C) THE UPPER SUBDISTRICT SET GILLNET FISHERY WILL BE CLOSED FOR ONE CONTINUOUS 36-HOUR PERIOD PER WEEK BEGINNING BETWEEN 7:00 _P.M. THURSDAY AND 7:00 A.M. FRIDAY AND FOR ONE

CONTINUOUS 24-HOUR PERIOD PER WEEK BEGINNING BETWEEN 7:00 P.M. MONDAY AND 7:00 A.M. WEDNESDAY;]

(3) at run strengths greater than 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of **1,300,000 - 1,750,000** [1,100,000 - 1,500,000] sockeye salmon past the sonar counter at river mile 19;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than **51** [84] hours per week, except as provided in 5 AAC 21.365; and

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 36-hour period per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday **and for one continuous 24-hour period per week beginning between 7:00 a.m. Tuesday and ending 7:00 a.m. Wednesday.**

(d) The sonar count levels established in this section may be lowered by the board if noncommercial fishing, after consideration of mitigation efforts, results in a net loss of riparian habitat on the Kenai River. The department will, to the extent practicable, conduct habitat assessments on a schedule that conforms to the Board of Fisheries (board) triennial meeting cycle. If the assessments demonstrate a net loss of riparian habitat caused by noncommercial fishermen, the department is requested to report those findings to the board and submit proposals to the board for appropriate modification of the Kenai River late-run sockeye salmon inriver goal.

(e) Repealed 6/11/2005.

(f) Repealed 6/11/2005.

(g) Subject to the requirement of achieving the lower end of the sustainable escapement goal, the department shall provide for a personal use dip net fishery in the lower Kenai River as specified in 5 AAC 77.540.

(h) Subject to the requirement of achieving the lower end of the sustainable escapement goal, the department shall manage the sport fishery on the Kenai River, except that portion of the Kenai River from its confluence with the Russian River to an ADF&G regulatory marker located 1,800 yards downstream, as follows:

(1) fishing will occur seven days per week, 24 hours per day;

(2) the bag and possession limit for sockeye salmon is three per day, with six in possession, in the sport fishery, **the projected inriver run of sockeye salmon above the Kenai River sonar counter located at river mile 19 exceeds 1,750,000 fish** [UNLESS THE DEPARTMENT DETERMINES THAT THE ABUNDANCE OF LATE-RUN SOCKEYE SALMON EXCEEDS 2,300,000 FISH], at which time the commissioner may, by emergency order, increase the bag and possession limit as the commissioner determines to be appropriate; and

(3) if the projected inriver run of sockeye salmon above the Kenai River sonar counter located at river mile 19 is less than **1,300,000** [900,000] fish and the inriver sport fishery harvest is projected to result in an escapement below the lower end of the sustainable escapement goal, the commissioner may, by emergency order, decrease the bag and possession limit, as the commissioner determines to be appropriate, for sockeye salmon in the sport fishery above the Kenai River sonar counter located at river mile 19.

(i) For the purposes of this section, "week" means a calendar week, a period of time beginning at 12:00:01 a.m. Sunday and ending at 12:00 midnight the following Saturday.
(j) The commissioner may depart from the provisions of the management plan under this section as provided in 5 AAC 21.363(e).

What is the issue you would like the board to address and why? The current late run sockeye salmon management plan is failing to provide adequate opportunity for inriver users. The Kenai River is the primary source for salmon for south central Alaska, the state's most populated area by far. The economy of the Kenai River valley is also directly linked to salmon fishing opportunity and is being hard hit by the lack of opportunity. Inriver salmon contribute vastly more revenue to the state than commercially caught fish and the Kenai River can no longer support the demands of so many user groups. Priority exists for commercial fishermen to target sockeye salmon destined for a vast number of Cook Inlet rivers, many of which are not accessible by sport, guided sport, subsistence and personal use fishermen and none of which are so critically vital as a food source, a cultural identity and a way of life for so many Alaskans.

PROPOSED BY: Mike Adams (HQ-F19-056)
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PROPOSAL 90
5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.
Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to manage primarily for sport, personal use and guided sport anglers; increase the sustainable escapement goal; and limit commercial fishing periods, as follows:

Amend - 5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan
(a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for **sport, personal use and guided sport fishermen** [COMMERCIAL USES] based on abundance. The department shall also manage the commercial fisheries to minimize the harvest of Northern District coho, late-run Kenai River king, and Kenai River coho salmon stocks to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.
(b) The Kenai River late-run sockeye salmon commercial, sport, and personal use fisheries shall be managed to
(1) meet the sustainable escapement goal (SEG) range of **1,300,000 - 1,750,000** [700,000 - 1,200,000] late-run sockeye salmon;
(2) achieve inriver goals as established by the board and measured at the Kenai River sonar counter located at river mile 19; and
(3) distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run.
(c) Based on preseason forecasts and inseason evaluations of the total Kenai River late-run sockeye salmon return during the fishing season, the run will be managed as follows:
(1) at run strengths of less than 2,300,000 sockeye salmon,
(A) the department shall manage for an inriver goal range of **1,300,00 - 1,750,000** [900,000 - 1,100,000] sockeye salmon past the sonar counter at river mile 19; and
(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC

21.320, through July 20, unless the department determines that the minimum inriver goal will not be met, at which time the fishery shall be closed or restricted as necessary; [THE COMMISSIONER MAY, BY EMERGENCY ORDER, ALLOW EXTRA FISHING PERIODS OF NO MORE THAN 24 HOURS PER WEEK, EXCEPT AS PROVIDED IN 5 AAC 21.365;]

(2) at run strengths of 2,300,000 - 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of **1,300,000 – 1,750,000** [1,000,000 - 1,300,000] sockeye salmon past the sonar counter at river mile 19 between July 1 and August 14;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than **24** [51] hours per week, except as provided in 5 AAC 21.365;

[AND (C) THE UPPER SUBDISTRICT SET GILLNET FISHERY WILL BE CLOSED FOR ONE CONTINUOUS 36-HOUR PERIOD PER WEEK BEGINNING BETWEEN 7:00 P.M. THURSDAY AND 7:00 A.M. FRIDAY AND FOR ONE CONTINUOUS 24-HOUR PERIOD PER WEEK BEGINNING BETWEEN 7:00 P.M. MONDAY AND 7:00 A.M. WEDNESDAY;]

(3) at run strengths greater than 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of **1,300,000 – 1,750,000** [1,100,000 - 1,500,000] sockeye salmon past the sonar counter at river mile 19;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than **51** [84] hours per week, except as provided in 5 AAC 21.365; and

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 36-hour period per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday **and for one continuous 24-hour period per week beginning between 7:00 a.m. Tuesday and ending 7:00 a.m. Wednesday.**

…

(h) Subject to the requirement of achieving the lower end of the sustainable escapement goal, the department shall manage the sport fishery on the Kenai River, except that portion of the Kenai River from its confluence with the Russian River to an ADF&G regulatory marker located 1,800 yards downstream, as follows:

(1) fishing will occur seven days per week, 24 hours per day;

(2) the bag and possession limit for sockeye salmon is three per day, with six in possession, in the sport fishery, **the projected inriver run of sockeye salmon above the Kenai River sonar counter located at river mile 19 exceeds 1,750,000 fish** [UNLESS THE

DEPARTMENT DETERMINES THAT THE ABUNDANCE OF LATE-RUN SOCKEYE SALMON EXCEEDS 2,300,000 FISH], at which time the commissioner may, by emergency order, increase the bag and possession limit as the commissioner determines to be appropriate; and

(3) if the projected inriver run of sockeye salmon above the Kenai River sonar counter located at river mile 19 is less than **1,300,000** [900,000] fish and the inriver sport fishery harvest is projected to result in an escapement below the lower end of the sustainable escapement goal, the commissioner may, by emergency order, decrease the bag and possession limit, as the commissioner determines to be appropriate, for sockeye salmon in the sport fishery above the Kenai River sonar counter located at river mile 19.

What is the issue you would like the board to address and why? The current late run sockeye salmon management plan is failing to provide adequate opportunity for inriver users. The Kenai River is the primary source for salmon for southcentral Alaska, the states most populated area by far. The economy of the Kenai River valley is also directly linked to salmon fishing opportunity and is being hard hit by the lack of opportunity. Inriver salmon contribute vastly more revenue to the state than commercially caught fish and the Kenai River can no longer support the demands of so many user groups. Priority exists for commercial fishermen to target sockeye salmon destined for a vast number of Cook Inlet rivers, many of which are not accessible by sport, guided sport, subsistence and personal use fishermen and none of which are so critically vital as a food source, a cultural identity and a way of life for so many Alaskans.

PROPOSED BY: Cooper Landing Fish and Game Advisory Committee (HQ-F19-108)

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PROPOSAL 91

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Lower the Kenai River late-run sockeye salmon sustainable escapement goal, as follows:

First off, I would recommend that the goal for successful management of our fisheries should be based on harvest numbers, not on how high we can make the escapement levels. I believe that escapement should be set on a running average over time. If we know that an average escapement level of 874,276 sockeye produces a harvest 5.2 million, then each year's escapement goal should be set to achieve a 10-year average of 874,276 fish. If we go over that amount in one year, then we have to go under by an equal amount the next year, so to speak. Exceeding the appropriate escapement level year after year has led to greatly reduced harvests.

Secondly, managers must have the flexibility to allow fishing time and area to make sure the harvest goals are achieved. Time and area cannot be micro-managed ahead of time by the BOF and then expect harvest and escapement goals to be met in season.

What is the issue you would like the board to address and why? Kenai River sockeye escapement and escapement goals are by far the biggest driver for managing Cook Inlet commercial fisheries and in recent years escapement levels have become so high that the fishing has suffered tremendously. Harvest capability for all salmon in Cook Inlet are dependent on management for Kenai River sockeye.

Looking back to when Cook Inlet was managed for high production, we see that escapement was much lower. The 10-year period of 1979-1988 saw an average actual escapement of 874,276 sockeye. The resulting harvest for the years 1984-1993 was 5.2 million sockeye. The most recent 10-year harvest averaged 2.6 million sockeye, exactly half what it was with lower escapement levels. By contrast, the parent years of 2004-2013 averaged 1,499,051 sockeye escapement to the Kenai River, nearly double the amount that it used to be.

At the very minimum, it can be said that higher escapement into the Kenai River has not helped the harvest levels and that lower escapement levels did not harm the run sizes. The only result of increasing the escapement has been to stifle the commercial fishing industry.

PROPOSED BY: Teague Vanek (EF-F19-007)
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PROPOSAL 92
5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.
Reduce the Kenai River late-run sockeye salmon escapement goal range to 450,000-750,000 salmon, as follows:

Large returns came from 450,000 to 750,000 escapements. Return to these numbers. Since the escapement has doubled, returns are half.

What is the issue you would like the board to address and why? Kenai River sockeye escapement. A 1-1 spawner ratio could lead to a crash. Too many spawners equal smaller returns. In times of abundance, all users benefit.

PROPOSED BY: John McCombs (HQ-F19-036)
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PROPOSAL 93
5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan; and 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan.
Manage the personal use dip net fishery on the lower Kenai River subject to achieving the inriver goal, as follows:

Amend 5 AAC 21.360 (g) as below
5 AAC 21.360 (g) **The department shall manage the personal use dip net fishery in the lower Kenai River subject to the requirement of achieving the current in river goal as follows: If the commercial fisheries are restricted during the week from Sunday through the mandatory set net closure, the affected personal use fishery shall close as of 7:00 AM Friday, reopening at such time as a regular commercial period is fished.**

What is the issue you would like the board to address and why? There is no paired restriction for dip net PU and commercial fisheries in the Kenai River. Focusing the management of the PU fishery on the SEG, while the commercial fishery is managed to an In-River goal, as stipulated in

the current management plan is inherently unequal, and forces unequal distribution of the conservation burden.

My assumption is that a MAJORITY within all user groups would actually prefer to have harvest opportunity rather than fish swimming by; it may be the better option for the board to make all fisheries equally based upon achieving an SEG. The proposal I'm submitting here is based upon the scenario in which the BOF decides to retain an In-River goal.

A paired restriction is necessary to the management goal of managing primarily for commercial uses based on abundance. Beginning on July 20th, commercial fisheries may be further restricted or closed based upon a forecasted In-River Goal. A management decision to restrict the commercial fishery shall lead to the closure in the affected dip net fishery until such time as the commercial fishery has been reopened.

This restriction / closure may not seem like an equally paired restriction, however, excellent opportunities still exist in the sport fishery, with bag limits and opportunity more closely aligned to a stated objective of achieving an In-River goal. A complete closure of the commercial fisheries should lead to a closure in the sport fishery.

The intent of this proposal is to begin to share the burden of conservation at the current level of an In-River goal. Ultimately in order to promote regular openers for all commercial gear types as well as the PU fishery, managing to a SEG may be preferable to In-River goals.

PROPOSED BY: Nathan Hoff (EF-F19-105)

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PROPOSAL 94

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Implement an additional 24-hour closure in the Upper Subdistrict set gillnet fishery at run strengths greater than 4,600,000 Kenai River sockeye salmon, as follows:

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan

…

(c) (3) at run strengths greater than 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 1,100,000-1,500,000 sockeye salmon past the sonar counter at river mile 19;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than 84 hours per week, except as provided in 5 AAC 21.365; and

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 36-hour period per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday **and for one continuous 24-hour period per week beginning between 7:00 p.m. Monday and 7:00 a.m. Wednesday;**

What is the issue you would like the board to address and why? In the 2017 BOF meeting for Upper Cook Inlet Fin Fish the board approved the elimination of the mandatory 24 hour commercial set net closure on "Tuesday" when the Kenai River Sockeye run strength is expected to be greater than 4,600,000 sockeye salmon.

A Department assessment of the Kenai River Sockeye run strength greater than 4.6 million initiates much more allowable potential commercial fishing hours for harvesting this bumper crop of additional surplus fish. The "Tuesday" 24 hour mandatory set net closure window in earlier management plans was designed to allow some of that surplus return to reach the Kenai River and provide additional harvest opportunities for the Personal Use fishers and the Sport fishers inriver.

There was no biological or scientific reasoning to support the elimination of the "Tuesday" 24 hour closure window. This action resulted in a major loss of opportunity of surplus sockeye salmon in the Inlet to reach the Kenai River for the other two major user groups to share in the bounty. This resource is "owned" by all participants in each user group and the noncommercial users were unfairly penalized when surplus numbers reach record levels and the closure window was eliminated.

This requested change in the management plan reinstates the "Tuesday" 24 hour set net closure window during periods when greater than 4.6 million Kenai River sockeye are expected.

PROPOSED BY: Alaska Outdoor Journal/Gary Barnes (HQ-F19-111)

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PROPOSAL 95

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to remove and replace the provision to manage for commercial uses with a provision to manage for commercial, sport, and personal use groups, as follows:

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan

(a) [THE DEPARTMENT SHALL MANAGE THE KENAI RIVER LATE-RUN SOCKEYE SALMON STOCKS PRIMARILY FOR COMMERCIAL USES BASED ON ABUNDANCE.] **The department shall manage the Kenai River late-run sockeye salmon stocks based on abundance and acknowledge the value of all three major user groups - commercial, sport, & personal use - as viable management methods utilized to achieve a healthy and sustainable fishery.** The department shall also manage the commercial fisheries to minimize the harvest of Northern District coho, late-run Kenai River king, and Kenai River coho salmon stocks to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.

What is the issue you would like the board to address and why? Since statehood the Cook Inlet - Kenai River Late Run Sockeye Salmon stocks have been managed primarily for commercial uses based on abundance. Over the past 50 years the state's population has grown from 200,000 to 737,000 (2018) and a vast majority of those new residents (the resource owners) reside in the

Southcentral region of the state. It is acknowledged that nearly a half century ago the only viable means of managing salmon escapement numbers into our river systems, and specifically the Kenai & Kasilof rivers, was by commercial fishing set nets and drift nets.

The state has added more than a half million additional residents where a major portion of those rely on the resources of Cook Inlet, the Kenai Peninsula, and the Susitna/Knik regions to provide important recreational value as well as a vital food source for Alaskan harvesters. In addition, the visitor and tourism-related businesses and services, e.g. guides, lodges, & retail processors associated with the Kenai River late run sockeye salmon fishery have grown exponentially as well as seen major increases in the sport, personal use and subsistence user numbers. These fishery resources provide a vital infusion of money into local economies as well as create hundreds of seasonal and permanent jobs for Alaskans.

The management approach of "managing the Kenai River Late Run Sockeye Salmon stocks primarily for commercial uses based on abundance" as currently dictated in 5 AAC 21.360 (a) is outdated and creates a very disproportionate opportunity for the harvesting of these resources in today's world. Sport anglers and Personal Use harvesters continue to be ignored at present as a very capable and dependable management "tool" for controlling escapement numbers into the Kenai River no different than using commercial nets to harvest surplus fish. Whereas the commercial fishing industry of Cook Inlet has not created a single additional new job from the moment Limited Entry was adopted in 1974 and the number of commercial participants were frozen, the economic value of Cook Inlet fish resources to Alaska and the local communities and businesses relying on sport and personal use has grown and expanded at a very healthy rate year after year for decades.

The Department must adapt to a changing world with changing needs and priorities as it relates to our resources, economic development, and prosperity for Alaska. The proposed changes in this AAC wording (and philosophy) is to recognize the true value of each of the three major user groups and allow the Department to work between Commercial and Sport divisions to provide a more equitable distribution of surplus harvest based on the value not only to each individual user in each group but to the overall economic value each group contributes to Alaska's local economy. The Alaska State Constitution mandates the Department manage our fishery resources for all people of this state.

PROPOSED BY: Alaska Outdoor Journal/Gary Barnes (HQ-F19-112)

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PROPOSAL 96

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Increase the Kenai River sockeye salmon inriver goal, increase the sport limits, and pair closures, as follows:

Raise the Sockeye Escapement goal above the sonar in the Kenai River to 1.1 million to 1.3 million allowing a minimum of 400,000 fish for the sport fishing harvest

Draft reg: Increase daily bag limit to 6 fish per day/12 in possession. If fish are late, sockeye sport fishing will remain open on par with commercial fishing and both will close at the same time.

What is the issue you would like the board to address and why? Increase Kenai River Sockeye Allocation for Sport Fishing. Ref: ADFG Subsistence Report dtd 2014. It states the urban population is 612,475 (83%): sport fishermen harvested only 0.1% or the total fish resource. There are approximately +/- 300,000 resident sport fishermen. This is while commercial fishermen harvested 98.5 of the resource statewide. In 2014, there were 513 set gill net permits and 496 drift gill net permits that fished the Cook Inlet. This does not meet the intent of the Alaska Constitution Article VIII NATURAL RESOURCES that the natural resources are to be managed as a public trust providing for maximum use consistent with the public interests to provide people with common access for resources and based on sustainable yield . The 98.5% versus 0.1% isn't meeting the needs of the public maximum use benefiting all people with common access to the resource. The Kenai River is one of the few places where the public can gain road access to harvest fish.

To drive 300 miles round trip on the hopes of timing it just right to catch 3 sockeye per day is not economical. ADFG tries to manage the fish run to dribble fish into the river allowing maximum commercial harvest while providing minimum fish escapement. Management of the resource needs to satisfy both parties and not leave one user group to pick over the remains of the salt water harvest. There needs to be more fish in the river in greater amounts that will support a consistent sport fish harvest during the fish runs. I enjoy catching and eating salmon, not just fishing for it. My purpose is to harvest enough fish to last my family until next season. Based on the numbers above, sports fishermen are not receiving a fair allocation of the sockeye salmon resource.

I contend that 300,000 sports license holders harvesting 0.1% of the resource versus commercial permit holders harvesting 98.5% docs not comply with the intent of our constitution.

Furthermore, when fish were late as in 2018 with 51 % of the run arriving in August after the sockeye sports fishing was closed, the commercial permit holders were allowed to continue fishing. Only later in August was sports fishing reopened for a short period. Both parties should have been given equal opportunity to harvest the resource.

PROPOSED BY: Walt Arthur (HQ-F19-133)

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PROPOSAL 97

5 AAC XX.XXX. New section.

Create sport and personal use allocations of sockeye on the Kenai and Kasilof Rivers, as follows:

Under season limits in the regulation book.

Kenai River Sockeye dip net season limit is xxxxxx fish.
Kasilof River Sockeye dip net season limit is xxxxxx fish.
Kenai River Sockeye sports fishery season limit is xxxxxx fish.
Kasilof River Sockeye sports fishery season limit is xxxxxx fish.

What is the issue you would like the board to address and why? I would like the Alaska Board of Fisheries (BOF) to set a total allocation on the number of sockeye salmon for the Kenai and Kasilof dip net fishery and the Kenai and Kasilof inriver sport fisheries. By allocating a number to each fishery, and placing these numbers into management plans, these users would know how many fish they could harvest. This would hopefully eliminate the ongoing practice of always taking fish from another user group. I believe that the BOF and ADF&G have neglected their duty to the State of Alaska and our local community and users of this resource by not setting annual limits. The lack of a defined annual limit just adds fuel to the "fish wars" fire by not addressing this subject. For example, if the Kenai River dip net fishery had a harvest limit, they would know these fish were theirs and they could form rules to harvest accordingly. The current dip net fishery on the Kenai River is very successful. The same goes for the Kenai River sport fishery. If growth controls are not implemented on these user groups, the Kenai and Kasilof salmon fisheries will eventually fail or they will mandate the entire commercial fishery be closed to meet their unlimited demands. Without limits, as these fisheries are allowed to grow, we will witness the depletion of the salmon, and increased habitat destruction (note the Kenai River is already classified as an impaired water body during July).

In order for this regulation to work, an accurate daily count of the harvested salmon must be accounted for. Each user group can derive a harvest accountability system that works for them.

PROPOSED BY: Chris Every (HQ-F19-016)

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PROPOSAL 98

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Establish an annual limit for the Kenai River sockeye salmon sport fishery, as follows:

5 AAC 21.360(h) would be amended to add a new subsection (4) as follows:

(4) from July 1 – December 31, an annual limit of no more than 21 sockeye salmon may be retained in the entire Kenai River drainage sport fishery.

What is the issue you would like the board to address and why? According to 5 AAC 21.360(a), the department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance.

In recent years, because of poor king salmon runs to the Kenai River, many king salmon sport fishers and guides have concentrated their efforts on harvesting sockeye salmon. When Kenai River sockeye salmon runs are estimated to exceed 2.3 million fish, the department has the option of increasing the daily bag and possession limit as the commissioner determines to be appropriate. Often times, this means the bag and possession limits are increased to 6 sockeye salmon per day or 12 in possession. If a sport fisherman were to successfully fish the Kenai River for a week straight, this means they could harvest as many as 84 fish. For residents, this is in addition to liberal personal use limits of 25 fish per head of household plus 10 additional fish for each dependent.

This proposal seeks to put an annual limit on the number of sockeye salmon that can be harvested in the Kenai River sport fishery.

PROPOSED BY: Chris Every (HQ-F19-021)

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PROPOSAL 99

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Establish mandatory closed inriver fishing windows for sockeye salmon, as follows:

In order to establish a true pass-through fishery, the in-river fishery requires windows also.

What is the issue you would like the board to address and why? Windows do not achieve desired effect. This re-allocation hamstrings managers in sockeye management. Mandatory closures complicate management. More kings could spawn if they pass through.

PROPOSED BY: John McCombs (HQ-F19-033)

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PROPOSAL 100

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to open commercial fishing periods to stay within ten percent of daily inseason run projections, as follows:

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan

…

(b) The Kenai River late-run sockeye salmon commercial, sport, and personal use fisheries shall be managed to

(1) meet the sustainable escapement goal (SEG) range of 700,000-1,200,000 late-run sockeye salmon;

(2) achieve inriver goals as established by the board and measured at the Kenai River sonar counter located at river mile 19; and

(3) distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run; **and**

(4) manage and initiate allowable fishing times based on not exceeding a 10% margin of deviation above or below the calculated run size projection as it applies from day to day.

What is the issue you would like the board to address and why? For a great number of years the commercial division of fisheries for the Cook Inlet region has initiated early season management harvest strategies and fishing hours based on the pre-season forecasts. And as has been the case repeatedly in recent times, this initial aggressive harvest strategy based on theoretical expectations has resulted in major deficits in Kenai River late run Sockeye salmon early escapement numbers and major shortfalls based on realtime run projections.

5 AAC 21.360 (b) (3) mandates that the Kenai River late run sockeye salmon shall be managed to distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run.

The 21st century is creating management challenges unlike any the Department has had to face in the past. Climate change has created El Nino cycles with increasing frequency (every 3-4 years) and lasting 16 months or longer. Alaska has not escaped the detrimental impacts on our resources from ever-increasing ocean temperatures having significant effects on the food chain which equates to fewer returning salmon stocks in many years. Biologists have no control over the severity of these negative impacts on our fisheries nor do they have the means to assess potentially lower returning numbers in advance of the salmon returning to the region that may be a result of at-sea impacts from known and unknown variables.

So managing the commercial harvest of Cook Inlet - Kenai River sockeye salmon stocks at the front end of the run based on pre-season expectations is not a viable scientific method in today's world and results in excessive compensations in management harvest strategy as shortfalls in projection and escapement rise because the numbers supporting that method were not valid or dependable in the early season.

Note the word evenly in the AAC. We have not followed that requirement of the plan and have routinely over-harvested a disproportionate percentage of the front end of the run with this approach. With the flexibility of the management team to choose when and how often commercial fishing will occur, there is no reason not to adopt a scientific management plan based on realtime numbers for inriver counts and the day to day run projection. Minimizing excessive harvest actions and then compensations for shortfalls is a benefit to all three user groups - commercial, sport, & personal use. It is called more stability and reliability for users.

It is time to execute the Kenai River Late Run Sockeye Salmon Management Plan on the realtime numbers as they are available each day. The purpose of this proposed change is to manage commercial harvest fishing hours based on the Department's new goal to stay within a fixed amount of deviation from the daily realtime run projection without any speculation or unsubstantiated assumptions applied.

PROPOSED BY: Alaska Outdoor Journal/Gary Barnes (HQ-F19-110)
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PROPOSAL 101
5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.
Amend the preamble to the *Kenai River Late-Run Sockeye Salmon Management Plan* by removing minimize language and adding a provision for common property fishery harvest, as follows:

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan. (a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance. [THE DEPARTMENT SHALL ALSO MANAGE THE COMMERCIAL FISHERIES TO MINIMIZE THE HARVEST OF NORTHERN DISTRICT COHO, LATE-RUN KENAI RIVER KING, AND KENAI RIVER COHO SALMON STOCKS IN ORDER TO

PROVIDE PERSONAL USE, SPORT, AND GUIDED SPORT FISHERMEN WITH A REASONABLE OPPORTUNITY TO HARVEST SALMON RESOURCES] **The department shall also manage the common property fisheries with a reasonable opportunity to harvest salmon resources.**

What is the issue you would like the board to address and why? Delete unnecessary language in the Cook Inlet salmon management plans that restricts the flexibility for the managers to manage on a real time basis based on in season abundance to harvest the surplus salmon. This language has resulted in tens of millions of harvestable salmon going unharvested and negatively affects the commercial fishing industry, communities, national food source, economies and also decreases future salmon production resulting from the effects of over escapement. The sports fishery has a reasonable opportunity for the fact that salmon run in the thousands of streams in the Cook Inlet drainage from May to October and most all are open to sports fishing. If one system is not open for escapement reasons a sports fisherman has many other system they can fish. In comparison the commercial fisherman, when restricted or closed down, has no other area to fish because they are restricted to the areas and their gear type by their limited entry permit they own. There is unfair and has no parity in reasonable opportunity between commercial and recreational fisheries under the current management plans.

PROPOSED BY: Central Peninsula Fish and Game Advisory Committee (HQ-F19-099)
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PROPOSAL 102
5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.
Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to manage for the lower bound of the sustainable escapement goal and replace inriver goals with allocation ranges, as follows:

Add new sentence to 5 AAC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan
(b)(3) In any year when the number of spawners exceeds 1,030,000, the following year the department shall manage to the lower boundary (700,000) of the escapement goal.
(c)(1)(A) remove and replace with a direct allocation of up to 100,000 or xxx,xxx
(c)(2)(A) remove and replace with a direct allocation of up to 200,000 or xxx,xxx
(c)(3)(A) remove and replace with a direct allocation of up to 300,000 or xxx,xxx

What is the issue you would like the board to address and why? Kenai River Late-Run Sockeye salmon escapement goals. Consecutive 1,030,000 or larger back-to-back spawners lowers the yield available in successive years for all users. Many departmental, North Pacific Management Council and independent salmon research papers indicate that when years of high (1,030,000) plus spawners should be followed by low spawning abundance. "1) high spawning abundances in current and prior brood years is associated with low productivity (log recruits-per-spawner), 2) maximum productivity appears to be associated with low spawning abundance in the brood year and spawning abundance (near 1 million in the) prior brood year, and 3) spawning abundances either above or below this level in the prior brood year are associated with reduced population productivity." Cunningham, 2019. This finding is in agreement with the Brood Interaction model by Carlson & Tarbox in 1998. Willette's escapement goal analysis, back-to-back 1,030,000 or

larger spawner into the Kenai River do not achieve maximum or even near maximum yield for any user group. In any year(s) with over 1,030,000 spawners, the next year should be near the bottom of the recommended escapement range of spawners. Anytime the number of spawners exceeds 1,030,000, the next year should be at or near the bottom of the escapement (spawners) range. The current escapement (spawners) range is a 700,000 lower boundary to a 1,200,000 upper boundary with an SMSY value of 950,000 spawners. The new recommended escapement goal is a 750,000 lower boundary to a 1,300,000 upper boundary with an SMSY value of 1,025,000. To avoid these 1,030,000 plus spawners back-to-back in the late-run Kenai River Sockeye salmon, there are several regulatory changes recommended.

PROPOSED BY: United Cook Inlet Drift Association (HQ-F19-093)
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PROPOSAL 103

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Make numerous amendments to the *Kenai River Late-Run Sockeye Salmon Management Plan*, as follows:

Change SEG in (b) (2) to 600,000 - 1,000,000 sockeye salmon
Add to (b) (2) ADFG needs to obtain funding when possible to put additional sonars between RM 48-50 and RM 78-80 so an accurate count of sockeye can be established on the Skilak and Kenai Lakes. A counter below RM 5 would help with catch data and real time management as well.
Amend (c) (1) At run strengths of 3.5 million sockeye salmon or less;
Amend (c) (1) (A) The Department shall manage for an in river goal of 800,000-1,000,000 sockeye salmon. When King Salmon need to be preserved, the drift fishery will be used first to manage run goals. Remaining should stay traditional. Department may use EO's to update real time run information.
Eliminate (c) (2) in its entirety.
Replace (c) (2) At a run strength above 3.5 million sockeye;
Replace (A) The department shall manage for an in-river sockeye salmon run between 900,000-1,200,000. When King Salmon need to be preserved the drift fishery will be used first if possible to manage the run.
Eliminate (c) (2) (B & C) in entirety.
Eliminate all of (c) (3) in its entirety.
Amend (h) (1) to read; Fishing will occur 7 days a week, from 7:00am until 7:00pm.

What is the issue you would like the board to address and why? The tri-level of trigger points in this regulation for this or that, makes it almost impossible to manage a multi-use fishery. Time to make the process much simpler so the department can manage runs in real time, instead of projections which are now managing them. Good management requires flexibility. There is almost none in this regulation. A two-tier system would be much more efficient at making easier management practices. Management/Department has no idea how many spawners go into Skilak or Kenai lake. Only best guess estimates. By placing sonars between mile 48-50 and 78-80 would give us loads more info of how the run is really dispersed through the system. Over-escapement on the now more turbid Kenai is resulting in much smaller fry coming out of the Kenai Lake and

River and much lower survival rates. The dip net fishery needs to have separate/opposite times on the rivers from the commercial fisheries, for safety, less conflict and easier management.

PROPOSED BY: Mark & Elbridge Walker (EF-F19-119)

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