



---

March 07, 2022

Dear Board of Fish,

Please do not pass this bill it will kill you fishery and you won't have me and my friends up there as a money spending tourist,

Tom key

Casper wyoming

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery.

Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tom Key

Casper  
82609



---

February 16, 2022

Dear Board of Fish,

The Kenai Peninsula relies on its salmon fisheries for financial survival. The economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tom Mader

Cooper Landing  
99572



Submitted By  
Tom Manos  
Submitted On  
3/7/2022 9:19:20 AM  
Affiliation  
Area M Fisherman

Phone  
907-830-5150  
Email  
[manostom@gmail.com](mailto:manostom@gmail.com)  
Address  
PO Box 749  
151 Okemo Road  
Girdwood, Alaska 99587

This comment is regarding Proposal 282

Do No Harm , the principle of nonmaleficence A key ethical principle put forward by Hippocrates almost 2500 years ago and is the guiding principle in the oath sworn to by medical doctors today. Hippocrates was reluctant to administer drugs and **engage in specialized treatment that might prove to be wrongly chosen.**

Nonmaleficence has most often been the guiding principle of the Alaska Board of Fisheries on issues of conservation and allocation In my 44 years of fishing in Alaska I have been involved in that process in almost every fishing area of the State of Alaska for number of different fisheries. I feel this board process has created perhaps the most successfully managed fisheries in the world both from a conservation and an allocation perspective.

What is going on in the Chignik salmon resource is of justifiable concern ,though its cause and remedy are not at all clear. Harmful and most likely unsuccessful remedies will seriously detract from the Board process now and in the future. My hope is that this board will act more like doctors following the principles of do no harm rather than the behavior of medieval bloodletting barber surgeons.

This proposal , if passed, will do much harm for the people , processors, and communities of western Alaska that rely on the Area M Salmon fishery. There is no reliable evidence that this proposal will be of significant economic, or conservation, benefit for Chignik.

ADF&G fisheries management has emergency order authority to address conservation concerns arising from interception fisheries in on going fisheries and they have exercised this authority in two of the last four years. Taking out of cycle Board action disrespects ADF&G management and any economic benefit for the Chignik fleet will be imperceptible , positive conservation impact will most likely be nil if you believe the current science and run predictions for 2022. This proposal may be harmful due to possibly deterring in season emergency action management efforts.

Passing this proposal will certainly be a dramatic and harmful bloodletting by a process that will appear to be guided by medieval barbers rather than the thoughtful wisdom of Hippocratic principles.

I urge the board to follow the principle of Do No Harm

Respectfully

Tom Manos



---

February 15, 2022

Dear Board of Fish,

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals. I have fished the river for 45 years and have witnessed first hand the decline in the number of kings. I definitely want them back for all users.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tom Wellman

Sterling  
99672



---

March 06, 2022

Dear Board of Fish,

I am a 49+ year resident of Anchorage and have always fished the Kenai Peninsula, unfortunately I have witnessed the decline of the Kenai River King salmon fishery, and I have/will support the conservation of all fisheries in Alaska, especially the Kenai River King salmon fishery for future generations.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Toney Hannah

Anchorage  
99515



Submitted By  
Tony D Jackson  
Submitted On  
2/28/2022 11:39:29 AM  
Affiliation

Phone  
9072527818

Email  
[mrjacksonteaches@yahoo.com](mailto:mrjacksonteaches@yahoo.com)

Address  
52500 Leah Street  
Nikiski, Alaska 99611

Regarding board generated proposal #283, I am all in favor of this type of regulatory change.

After a decade of being a set net commercial fisherman, I have watched with sadness and frustration as the Kenai River is over escaped year after year while ADFG has our nets out of the water. I support this proposal because it will allow for harvesting of sockeye, a food that feeds the world, and better scientific management of the Kenai River. Passing this proposal will not eliminate sportfishing or dip net personal use opportunities, it will in fact allow for an equitable harvest by ALL USERS, which is in State of Alaska Constitution (Article VIII).

Thank you for proposing and looking at alternatives to the management plan we are currently using.



---

February 15, 2022

Dear Board of Fish,

Born and raised in Alaska I now live out of state. I visit friends and family in Anchorage and the Kenai peninsula every summer and the Kenai river remains of the utmost importance to my family and Me.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Travis Derks

La Mesa  
91941



Submitted By  
Travis Every  
Submitted On  
3/11/2022 4:58:37 PM  
Affiliation

Members of the Alaska Board of Fisheries,

I am writing this in support of Proposal 283. Proposal 283 simply seeks to provide the Alaska Department of Fish and Game with an additional tool to harvest surplus sockeye salmon bound for the Kenai and Kasilof Rivers with set gillnet gear once the SEG of 13,500 Kenai River late-run king salmon has been met.

2021, and previous years, experienced sockeye salmon returns to both the Kenai and Kasilof Rivers that substantially exceeded each river's sockeye escapement management objectives. According to ADFG fish count website, the Kenai River was to be managed to an in-river goal of 1,000,000 to 1,200,000 sockeye in 2021. The final number of sockeye past the counter in 2021 was 2,441,825. 1,241,825 sockeye above the upper end of the goal. The Kasilof River is managed to a BEG of 140,000 to 320,000 with an OEG of 140,000 to 370,000. The final sockeye count in the Kasilof River for 2021 was 521,859. 201,859 sockeye above the upper end of the BEG.

The recent closure of the Cook Inlet EEZ to commercial salmon fishing was not discussed during any BOF meeting when the current Kenai River Late Run King Salmon Management Plan was modified. The UCI drift fleet had access to substantially more fishing area in 2021 than they will in 2022. This will only further increase the amount of harvestable surplus sockeye bound for both the Kenai and Kasilof Rivers.

Proposal 283 would provide limited opportunity to target sockeye within the ESSN when there is a harvestable surplus, while reducing the incidental chinook harvest by utilizing the 600ft fishery.

Travis Every





5303 Shilshole Ave. NW, Seattle, WA 98107-4000  
(206) 783-3818 • Fax: (206) 782-7195

March 11, 2022

Alaska Board of Fisheries  
Marit Carlson-Van Dort, Chair  
Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Public comment on Proposal 282**

Chair Carlson-Van Dort and Board Members:

On behalf of Trident Seafoods, I thank you for the opportunity to comment on **Proposal 282**, which requests further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area. **For the reasons detailed below, we ask the Board to delay taking any action until the in-cycle meeting in 2023.**

**Proposal 282 will have a significant impact on Trident's ability to serve both Chignik and Area M fleets.**

Trident Seafoods is a family-owned company, with shoreside processing and fleet support facilities in twelve Alaska communities, including Sand Point, False Pass, and Chignik. Our Sand Point facility is uniquely impacted by any Board action pertaining to Area M and Chignik, as it serves as the primary processor for salmon harvested in Chignik, while also being dependent on our Area M fleet's ability to access the Area M salmon resource. Reductions in Area M harvest opportunity will negatively impact the viability of operations in Sand Point, which will, in turn, decrease our ability to serve the Chignik fleet. Both of these salmon fisheries are important to the ongoing processing activity in the region and the communities they support.

**The complexity of Area M and L management necessitates the type of robust analysis that only an in-cycle meeting can provide.** As noted by Alaska Fish and Game (ADFG) staff during the October work session, Area M management is incredibly complicated and acting out-of-cycle at the end of long back-to-back Board meetings is not good public process. It is important to note that the Board did not produce a decision record after its last meeting where it took significant action to restrict fishing opportunity in Area M, as it did when it made major changes to the Area M management structure in 2004. This Board has been almost entirely reshuffled since the 2018 meeting, and an understanding of past management decisions will be essential to understand the impact of Proposal 282. For this reason, it is better for the Board to take a focused approach during the 2023 in-cycle meeting, where new members can consider a full suite of information and proposals related to Areas M and L.

**Potential future changes to Chignik escapement management support delayed action.** In October, ADFG indicated that it was planning on making significant changes to how it manages Chignik escapement goals and that these changes will be before the Board during the in-cycle meeting in 2023. These changes will impact how the Board balances the impact of management changes to Area M and Chignik. It therefore seems premature to consider a proposal that will have significant impact on the stakeholders of Area M, before the Board evaluates how changes to escapement goals will impact allocations.



**It is not clear that a conservation concern exists.** Late-run and total escapements were achieved in 2021. 2021 total season sockeye escapement is near the five-year average and actually increased relative to the three-year average. Neither run is listed as a “stock of concern.” ADFG forecasts that Chignik runs will meet escapement in 2022, as the preliminary forecast for Chignik is for an early run of 639,000 sockeye (escapement of 400,000 and harvest of 239,000).

In 2019, the Board increased closed areas for all gear types in the South Peninsula June fishery and closed the Dolgoi area to seining in June. These restrictions had significant negative impacts on harvesters, processors, and communities in Area M, *and have not even been given a full sockeye life cycle for the Board to evaluate their efficacy in increasing Chignik runs.* Looking at the fishery performance over the past four years, there does not appear to be a strong causal link to June harvest in the Shumagin/Dolgoi Island area and early-run Chignik sockeye; rather, the most direct connection to Chignik’s runs appears to be associated with habitat degradation in Black Lake and the corresponding condition of out-migrating smolt, which was poor from 2007 – 2019. The Board should not support a proposal that results in further direct economic harm at this point, especially given the lack of corresponding benefit.

**Even if a conservation concern existed, ADFG already has authority to restrict Area M harvests in order to minimize harvest of Chignik-bound sockeye.** ADFG used this authority in 2018 and 2020 to close the Dolgoi Island Area and reduce fishing times in the Shumagin Islands. ADFG can continue to use this authority as needed until all potential issues regarding Chignik runs can be explored in the next meeting cycle. Please do not support Proposal 282 at this time.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Shannon Carroll".

Shannon Carroll  
Director, Alaska Fisheries Development and Public Policy



---

February 15, 2022

Dear Board of Fish,

It is important to appear 283. The reduction in King Salmon in the Kenai River is a tragedy. We need to increase escapement to get numbers back up. Proposal 283 reduces king salmon through incidental catchment.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Troy Weiss

Anchorage  
99507



---

March 07, 2022

Dear Board of Fish,

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Ty Wyatt

Vancouver  
98682



---

March 12, 2022

Dear Board of Fish,

I split my time between Alaska and Washington DC, having a wife (Lisa Murkowski) in politics keep me busy. I also sit on the KRSA board. I fish on the Kenai, Naknek, Kvijack, Ship Creek, salt water in Prince of Whales. I see my/the catch rates change and at times completely shut off when the commercial fishermen have openers. Sometimes taking days for a river or bay to reload. Can't tell you how many days I have fished on the Kenai and caught zero reds after a set net opener. Not to mention the decline of King salmon over the last 30 years due to set net bycatch.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Verne Martell

Girdwood  
99587



Submitted By  
Wallace W. Hinderer  
Submitted On  
3/10/2022 1:10:00 PM  
Affiliation  
City Counsel Member

Chair Woman Carlson- Van Dort, and members of the Board;

My name is Wallace W. Hinderer. I am a resident and city counsel member of Chignik Alaska. I support Proposal 282. I feel it is a start of an attempt to restore escapement sufficiently capable of rendering returns, which allowed the 94 allocated permits to make a viable living. The city of Chignik whose existence depended on healthy Chignik runs is now a hairs breath from being no longer functional. If we are unable to rely on the volume of fish that resulted from careful management, The City of Chignik will die.

Please be advised that the Mayor and a majority of the counsel members have approved a motion giving me permission to make this statement

Sincerely,

Wallace W. Hinderer



---

February 15, 2022

Dear Board of Fish,

Former owner of Kenai River Inn and present owner of a house on the Kenai River since 2008. I have witnessed the progressive decline of Kings on the River.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Walter Bentley

Soldotna  
99669



---

February 24, 2022

Dear Board of Fish,

As a 52 year resident of the state I have watched the return of king salmon decrease, especially over the last 2 decades. I have fished kings, reds and silvers during these years. I want to see the king run grow and the red run to prosper. I think the commercial fishery needs to continue but not at the cost of reduced salmon runs.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Wayne Mundy

Kenai  
99611





---

February 19, 2022

Dear Board of Fish,

Reduce by catch of King Salmon by all lower Cook Inlet Commercial fisheries by shutting down all Lower Cook Inlet commercial fisheries when optimum escapement of King Salmon has not been reached.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

wayne wilken

Sterling  
99672



---

February 26, 2022

Dear Board of Fish,

My home is on mile 17 of the Kenai River. I have not fished Kings for the last 5 years to protect the greatest Kings in the world. Please stop any harvest to protect this species!!!!!!

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Wentworth James

Soldotna  
99669



**ALASKA BOARD OF FISHERIES  
Regulation Proposal Form 2020-2021**

Proposals must be received ~~Friday, April 10, 2020~~ **Friday, April 24, 2020**. *The proposal deadline has been extended given complications due the COVID-19 pandemic.*

**PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or E-MAIL  
dfg.bof.comments@alaska.gov or online  
<http://www.adfg.alaska.gov/index.cfm?adfg=process.proposal&board=fisheries>**

**BOARD OF FISHERIES REGULATIONS**

- Subsistence
- Personal Use
- Sport
- Commercial

**\*Which meeting would you like to submit your proposal to?**

- Prince William Sound Finfish & Shellfish
- Southeast & Yakutat Finfish & Shellfish
- Statewide Other Shellfish (excluding Southeast, Yakutat, and Prince William Sound)

**Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.**

**1. Alaska Administrative Code Number: 5 AAC 32.340 Registration Area H Inspection Points**

**\*2. What is the issue you would like the board to address and why?**

Dungeness Crab stocks seem to have recovered substantially in Cook Inlet and are now being seen and caught in other fisheries at relatively high numbers. I would like the Board to consider the 4 proposals submitted by me as a group to reopen the limited entry commercial Dungeness Crab fishery in Registration Area H, using the regulation changes as amended as appropriate developing a fishery using size, sex and season restrictions as is done in many other management areas. This fishery would be conducted as a test fishery reduced to 1/3<sup>rd</sup> of the former legal gear, become an exclusive fishery and have a shorter season. The open season would also be reduced in much of the area to allow a very conservative fishery to develop to see how the stocks have recovered. The permit holders can be responsible to collect whatever fishery data the department needs such as number of pots, duration of soak and size, sex and number of crab kept and released. Without some sort of starting point this fishery with approximately 100 limited entry permits will never reopen. The fishery is already limited to male Dungeness Crab 6 1/4 inches or greater in shell width. This proposal eliminates ADF&G from traveling to Seldovia where there is no ADF&G office.

**\*3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?**

5 AAC 32.340. Registration Area H Inspection Points. The inspection points for Registration Area H are at Homer [Seldovia,] and Seward, and at other locations that may be specified by the commissioner.

**\*Submitted By:**

Wes Humbyrd

**Individual or Group**

**\*Address**  
860 Willow Dr.  
**Home Phone**  
(907)399-4256

**\*City, State**  
Homer, Alaska

**\*Work Phone**

**\*ZIP Code**  
99603

**\*Email** whum@acsalaska.net

*\*Indicates a required field*

ALASKA BOARD OF FISHERIES  
Regulation Proposal Form 2020-2021

pg. 2 of 7



PC568  
2 of 7

Proposals must be received ~~Friday, April 10, 2020~~ **Friday, April 24, 2020**. *The proposal deadline is extended given complications due to the COVID-19 pandemic.*

PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or E-MAIL  
dfg.bof.comments@alaska.gov or online  
<http://www.adfg.alaska.gov/index.cfm?adfg=process.proposal&board=fisheries>

**BOARD OF FISHERIES REGULATIONS**

Subsistence       Personal Use       Sport       Commercial

**\*Which meeting would you like to submit your proposal to?**

Prince William Sound Finfish & Shellfish

Southeast & Yakutat Finfish & Shellfish

Statewide Other Shellfish (excluding Southeast, Yakutat, and Prince William Sound)

**Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.**

**1. Alaska Administrative Code Number: 5 AAC 32.310 Fishing Seasons**

**\*2. What is the issue you would like the board to address and why?**

Dungeness Crab stocks seem to have recovered substantially in Cook Inlet and are now being seen and caught in other fisheries at relatively high numbers. I would like the Board to consider the 4 proposals submitted by me as a group to reopen the limited entry commercial Dungeness Crab fishery in Registration Area H, using the regulation changes as amended as appropriate developing a fishery using size, sex and season restrictions as is done in many other management areas. This fishery would be conducted as a test fishery reduced to 1/3<sup>rd</sup> of the former legal gear, become an exclusive fishery and have a shorter season. The open season would also be reduced in much of the area to allow a very conservative fishery to develop to see how the stocks have recovered. The permit holders can be responsible to collect whatever fishery data the department needs such as number of pots, duration of soak and size, sex and number of crab kept and released. Without some sort of starting point this fishery with approximately ~~100~~ limited entry permits will never reopen. The fishery is already limited to male Dungeness Crab 6 1/4 inches or greater in shell width.

**\*3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say?**

5 AAC 32.310. Fishing Seasons. Male Dungeness Crab may be taken only as follows:

(1) Southern District:

(A) Subdistrict 1: From 12:00 noon June 1 to 12:00 noon on July 31 ;

(B) Subdistrict 2: From 12:00 noon June 1 to 12:00 noon on September 30 ;

(2) In the remaining waters of Statistical Area H, from 12:00 noon June 1 to 12:00 noon on September 30.

[There is no open fishing season for Dungeness crab in the Cook Inlet Area.]

**\*Submitted By:**

Wes Humbyrd

**Individual or Group**

**\*Address**

860 Willow Dr.

Home Phone

(907)399-4256

**\*City, State**

Homer, Alaska

**\*Work Phone**

**\*ZIP Code**

99603

**\*Email whum@acsalaska.net**

*\*Indicates a required field*



# DUNGENESS CRAB



PC568  
3 of 7

## COOK INLET

### Harvest and Effort

Commercial and noncommercial Dungeness crab fishing in Cook Inlet Management Area is closed. The commercial fishery in the Southern District was closed by EO beginning in 1991, although other districts remained open until 1997. The noncommercial fishery was closed in 1998. The commercial Dungeness crab fishery was developed in the Southern District during the late 1970s, driven by improved market opportunities caused by fluctuating catches in the Northwest Pacific. The highest annual harvest was 2.1 million lb in 1979 and the most participants was 108 in 1982 (Table 24). Harvests were above 1.0 million lb from 1978 to 1981

but declined in 1990 to 29,000 lb in the Southern District, the last year of the fishery. Although the fishery was closed in the Southern District after 1991, a limited entry program establishing 101 pot and 2 ring net permits was established in 1993. Participation was as low as 1 permit from 1992 to 1996 with crab landed from other districts besides the Southern District.

### Management and Regulations

There is no open fishing season for Dungeness crab in the Cook Inlet Management Area according to 5 AAC 32.310. Other regulations are not valid until Dungeness crab populations recover and a fishery is opened.

### Research

The Dungeness crab fishery was developed before any abundance levels were determined by a fishery-independent survey. ADF&G conducted annual (except 1999) pot surveys targeting Dungeness crab from 1990 to 2000. The survey area covered east and west of the Homer spit. The survey was discontinued because of the dramatic decrease in survey catch and the closure of the fishery; the last year of the survey yielded 9 total Dungeness crabs, 1 of them a legal male (Trowbridge and Goldman 2006; Figure 23).

After discontinuing the pot survey, the Kachemak Bay trawl survey was used to monitor any recovery of Dungeness crab abundance. There has been no indication of recovery and Dungeness crab levels have remained low. No directed surveys are planned for the near future. More detailed research information about directed Dungeness crab surveys can be found in Trowbridge and Goldman (2006).

In 2008, Dungeness crab appeared in significant numbers as non-targeted catch in the noncommercial Tanner crab fishery in Kachemak Bay. This prompted ADF&G to conduct a pot survey for Dungeness crab in 2009. The Dungeness pot survey was conducted from August 10 to August 13, 2009. In Mud Bay near the harbor mouth, 90 pots were set in the historical survey area and 15 pots were fished; the catch included 10 legal and 55 sublegal males, and 1 female. The 15 pots fished in the deep trench caught 7 females and 1 sublegal male. The pot survey indicated that the abundance of Dungeness crab in Kachemak Bay had not rebounded sufficiently to support a harvest (Trowbridge and Goldman 2006).

No targeted surveys have been conducted since 2008, but large-mesh trawl surveys have noted minimal Dungeness crab in their catch.



Table 24.—Commercial Dungeness crab harvest and effort in Cook Inlet Management Area, 1961–2015.

Year	Vessels	Landings	Harvest (lb)
1961	12	189	193,683
1962	15	269	530,770
1963	50	1,360	1,677,204
1964	22	341	423,041
1965	14	105	74,211
1966	5	28	129,560
1967	2	13	7,168
1968	7	224	487,859
1969	9	41	49,894
1970	10	50	209,819
1971	22	136	97,161
1972	24	206	38,930
1973	54	625	310,048
1974	38	619	721,243
1975	34	402	362,815
1976	19	123	119,298
1977	18	94	74,705
1978	49	668	1,215,779
1979	72	1,485	2,130,963
1980	54	1,183	1,875,281
1981	88	2,047	1,850,977
1982	108	2,310	818,885
1983	71	1,194	747,419
1984	102	1,687	800,208
1985	106	1,768	1,402,402
1986	83	1,069	563,862
1987	100	1,377	793,176
1988	84	1,305	719,275
1989	43	455	178,064
1990	23	112	29,502
1991	0	0	0
1992	1	1	7,108
1993	1	36	9,652
1994			<sup>a</sup>
1995	1		<sup>a</sup>
1996	1		<sup>a</sup>
1997–2015	Closed by regulation		

<sup>a</sup> Confidential data.



SPRING 2018

cod fish

50 FATHOM

pg. 5 of 7



PC568  
5 of 7







# Alaska crab is in high demand, but some fishermen are worried about stocks

Crab has been one of the hottest commodities since the COVID pandemic forced people in 2020 to buy and cook seafood at home and demand is even higher this year.

Crab is now perceived as more affordable when compared to the cost to enjoy it at restaurants, said global seafood supplier Tradex, and prices continue to soar.

That's how it's playing out for Dungeness crab in Kodiak and, hopefully, in Southeast Alaska, where the summer fishery got underway June 15.

Kodiak's fishery opened on May 1 and 76,499 pounds have been landed so far by just eight boats, compared to 29 last year. The Kodiak price this season was reported as high as \$4.25 a pound for the crab that weigh over 2 pounds on average. That compares to a 2020 price of \$1.85 for a catch of nearly three-million pounds, the highest in 30 years, with a fishery value of nearly \$5.3 million.

The pulls are skimpy, though, averaging just two crab per pot. Kodiak's Dungeness stocks are very cyclical and the fishery could be tapping out the tail end of a peak. Managers say this summer should tell the tale.

Southeast's summer Dungeness could see 190 or more permit holders on the grounds. Crabbers won't know until June 29 how



LAINE WELCH  
FISHERIES

much they can pull up for the two-month fishery after managers assess catch and effort information. The fishery, which occurs primarily around Petersburg and Wrangell, will reopen again in October.

Last season's combined summer and fall fisheries produced nearly 6.7 million pounds at the Panhandle, just shy of the Dungeness record of 7.3 million pounds set in 2002 and more than double the 10-year average.

Southeast crabbers averaged just \$1.72 per pound last season, down by more than a dollar for a 2020 fishery value of \$11.49 million.

Elsewhere, California crabbers fetched record prices for their Dungeness crab in a fishery that saw low landings and a shortened season that ran from Jan. 11 through early May.

The fleet of 359 crabbers fetched a record \$6.02 per pound for a catch of 3.6 million pounds, down 10 million pounds from the previous year. The value of this year's California fishery was \$18.7 million, down from nearly \$46 million in 2020.

At Las Vegas, a major crab market for the hotel and casino industries, television station KTNV said

Dungeness and snow crab legs have gone up between 17% and 33% in the past three months, reported Undercurrent News.

Alaska king crab legs have climbed 90% said John Smolen, owner of the Crab Corner Maryland Seafood House in Las Vegas

"We used to sell our Alaskan king crab legs for \$34.99 a pound, and we're currently selling them for \$59.99 a pound, which is still a very tight margin," Smolen said, adding that he believes the rise is the result of the pandemic depleting wholesale inventories.

"Until we can get our production way back up ahead of our usage and build up a reserve supply, I don't see the prices changing anytime soon," Smolen said.

Crab market expert Les Hodges added that "in order to maintain their gains, retailers must compete with the rapid opening of the food service sector in addition to a strong international demand for a resource that is limited in supply. Prices have been driven to all-time highs with more increases coming in the future for crab."

Kodiak-based Laine Welch writes Fish Factor, a weekly roundup of news and opinion about Alaska's commercial fishing industry that appears in newspapers and websites around Alaska and nationally. Contact her at [msfish@alaskan.com](mailto:msfish@alaskan.com).





Anchorage Daily News | Friday, January 7, 2022



ALAN BERNER / Seattle Times via TNS

Cooked, whole Dungeness crabs from British Columbia are selling for \$24.50 a pound at Pure Food Fish Market in the Pike Place Market in Seattle. Crabs average about two-pounds each, on Dec. 30.

# Off Washington state's coast, crabbers get early start to season, haul in bounty of Dungeness crab



---

February 15, 2022

Dear Board of Fish,

I am a second generation Alaskan fishing guide and have seen the decline on the Kenai. Now is not the time to lower escapement goals - every single King that is bound for spawning gravel needs a fair chance at getting there.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Will Stolski



---

February 15, 2022

Dear Board of Fish,

I live on the Kenai River, born & raised in Alaska. The decline off the King Salmon run in the Kenai River is alarming. Everything possibly should be done to preserve this unique run of King Salmon. I support restrictions on commercial & sport fishing. Close it to sport fishing & incidental commercial fishing. Let the run recover.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Cohen

Soldotna  
99669



---

March 01, 2022

Dear Board of Fish,

Born and raised on the Kenai peninsula and watching the Kenai king numbers diminish to the point they are at is incredibly sad. No additional changes that lower the chances for this historic run rebounds should be made. Especially if it's just in the interest of a group of individuals making a financial gain. The fish stock health should have the priority of financial gain. Protect the resource not someone's bank account.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Forrest

Soldotna  
99669



---

February 17, 2022

Dear Board of Fish,

Commercial fishing cones secondary to sports fishing or subsistence. If escapement goals are not met than commercial fisheries need to not be given priority over sports fishing and subsistence.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

WILLIAM HESTER

PALMER  
99645



William Jones  
111 Airport Road  
Chignik, Alaska 99564

Alaska Board of Fisheries  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

January 21, 2022

Re: Support for ACR 7 {Proposal 282}

I am a lifelong commercial fisherman with 60 plus years of family history fishing Chignik.

Chignik use to be a productive sockeye-salmon area. Since 2018 the Chignik fishery has been crippled. In the last four years, there has been with no fishing in June and July and only two years of late-run fishing. During this time, escapement goals have not been reached on the early-sockeye run and in two of the four recent years on the late run.

Chignik needs relief. That means management changes to where minimally, stock conservation should be moved to the forefront. ACR 7 is a first step calling for less fishing in the Shumagins and Dolgoi islands when Chignik is not meeting escapement. It is irrational that these areas, as known migration areas for Chignik-bound sockeye salmon, are not currently required to share any conservation responsibly.

While I recognize that in the Shumagins, Bristol Bay sockeye are the primary stock, I understand that Bristol Bay sockeye can readily be harvested in waters further west closer to False Pass and King Cove. When east-bound Chignik are not meeting escapement, Area M fishermen could adjust by moving to waters to the west. Chignik fishermen do not have options. Their entire fishing area is closed.

Thank you.

Sincerely,

*William Jones*



---

February 15, 2022

Dear Board of Fish,

I have lived at mile 17.5 of the Kenai River for over 20 years and have witnessed the demise of the demise of the King Salmon firsthand. I have been an advocate for completely closing all avenues of harvest of this great species for at least 7 full cycles of returning fish. 1st and 2nd runs would be unmolested giving them the best chance of returning to their past glory. Obviously, this would include the closing of commercial King Harvest as well by placing tighter restrictions on Mesh size and depth.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Keller

Soldotna  
99669





---

February 16, 2022

Dear Board of Fish,

I first came to Alaska in the early 1980's, and moved here permanently in 1995. Prior to that, I lived in Oregon and Southwest Washington. One of the biggest reasons I came to Alaska was the fishing, chiefly King Salmon! I had seen the incredible decline of the Columbia River fishery, with many spawning streams' runs of native Salmon and steelhead all but disappearing. And now I am witnessing the same politics and greed destroying the greatest cold water fishing in the world! King Salmon have been next to non-existent in the Mat-Su, the giant Kenai kings fished out. Kings should be declared endangered, and silvers aren't far behind. I haven't fished for Kings in most of the past decade, as restrictions and closures have become the norm...but I would voluntarily leave them alone to try to preserve the fishery, even without restrictions!! We are at a tipping point...maybe beyond....,

It is unconscionable to loosen restrictions on ALL users, especially the commercial interests that indiscriminately catch and waste ALL species in their nets. VOTING NO ON 283 IS A START. Then find a way to rid us of the massive destruction and wanton waste of the factory trawlers that I believe are the #1 reason for the mess we are in!

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William LeDoux

Wasilla  
99654





---

February 19, 2022

Dear Board of Fish,

I live in Soldotna and have been sport fishing for years. Fishing management requires sacrifice by all user groups to rebuild the King stocks. Vote know on 283 to support this goal and the economy of the Kenai peninsula.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Loper

Soldotna  
99669



---

February 25, 2022

Dear Board of Fish,

Hello! My name is William McComas, I am 22 years old and have been a guide on the Kenai and Kasilof rivers for the last 5 years. I believe balanced fisheries management is very important not only for the sport fisherman, but for the tourism which massively benefits local and state economy, local businesses with short "high season" windows and the environmental impact salmon have the river.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William McComas

La Conner  
98257



---

March 02, 2022

Dear Board of Fish,

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Melin

Anchorage  
99516



---

March 05, 2022

Dear Board of Fish,

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Minnette

Eagle river  
99577



---

March 11, 2022

Dear Board of Fish,

It's way past time to place conservation ahead of opportunity and the Kenai King should not be decimated in the interest of harvesting the more abundant species. I find it appalling this is a board generated proposal. I would expect it from the set netters but not from the BOF members who are charged with protecting our resources.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Niederhauser

Kenai  
99611



---

March 01, 2022

Dear Board of Fish,

I live and fish on the Kenai river. Restrictions to sport fishing of king salmon without restrictions for the commercial interception during low return periods is irresponsible and not acceptable

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Simpson

Sterling  
99672



---

February 18, 2022

Dear Board of Fish,

I live on the Kenai River. We retired to our current home because we believed that Alaska had its' house in order with the fish populations on the river. Then we saw the outdoor channels "Fish Wars" series about commercial fishing and how irresponsible it was and then experienced closures of sport fishing on the Kenai because of commercial fishing debauchery and greed. Shut the commercial fishing down before it completely destroys the native populations. Vote no on proposal 283 and put even more restrictive regulations in place to put in even stricter limits for commercial fishers! Just vote no on #283!!!

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

William Stroess

STERLING  
99672



---

February 17, 2022

Dear Board of Fish,

As an Alaskan who has fished the Kenai River on and off since 1993 I am opposed to the proposition. I personally think more needs to be done to save the King Salmon fishery. I've sadly seen how it has declined during the past 3 decades. I live in Soldotna and talk to tourists who most often agree it should be shut down but will continue to fish for them as long as the fishery is open. To allow this proposition to pass would severely cripple the King runs.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Zoa Loper

Soldotna  
99669





ShrimpPros Association  
PO Box 512  
Girdwood, AK 99587



March 11, 2022

Alaska Department of Fish and Game Boards Support Section  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Attn: Alaska Board of Fisheries  
John Jensen  
Marit Carlson-Van Dort  
Gerad Godfrey

Israel Payton  
John Wood  
McKenzie Mitchell

**Subject: Prince William Sound Shrimp Proposals**

To the Members of the Alaska Board of Fisheries,

***Shrimp are a natural resource which you are entitled to harvest or purchase fresh if you do not have the means to harvest.***

ShrimpPros is a nonprofit, unincorporated, association of commercial fishermen, with a participation history in the Prince William Sound pot shrimp fishery. Our intent is conserving and continuing to develop this modest fishery resource. The members include catchers, catcher-sellers, and marketing businesses. Several members participate in other fisheries, while many participate exclusively in this fishery.

Our common interest is in the conservation of this resource for future generations. We support management of this resource to sustained yield principles, as codified in state statute. The membership holds the following positions on these proposals before the board.

**PROPOSAL 237; SUPPORT**

Provide department authority to deny eligibility to participate in the Prince William Sound non-commercial shrimp fishery if a participant fails to comply with reporting requirements.

There is an evident need to secure accurate harvest information from all participants. This proposal attempts to account for the harvest from 10-12% of the non-commercial participants that fail to return permit harvest information to the Department. This is a simple way to encourage timely reporting and bears no undue burden to the private fisherman.



### **PROPOSAL 238; OPPOSE**

Close the commercial and noncommercial shrimp fisheries in Prince William Sound, as follows:  
Close shrimping season until mid summer or later.

There is no relevant scientific evidence provided by the proposer to justify such an action.

### **PROPOSAL 239; OPPOSE as written**

Allow noncommercial vessels to have additional shrimp pots on board.

The regulation, as interpreted, already allows this activity, as outlined in the SouthCentral Alaska Sport Fishing Regulations Summary Booklet. This proposal has no effect on the interpretation of current regulations. It does, however, contradict the intent of the existing regulation, which is to limit the fishing effort by having a maximum number of pots that can be fished from a boat.

In the year 2020, there were approximately 4500 sport permits issued, with approximately 2600 reported as fishing. There was an 89% reporting rate. The non-commercial pot limit was 3. The sport GHL was over harvested by 38%, or 38,368 lbs. Encouraging the carriage of excess gear undermines the management effort of limiting the number of pots that a sport boat is allowed to fish. This would codify, and make unenforceable, sport gear pot limits. This is currently the only management tool used by the Department to limit harvest to the allocated non-commercial GHL.

Enforcement of gear limits for non-commercial fishermen is almost impossible at this point. Direct experience with law enforcement in the field has verified this to be true. Pot gear can be fished remotely, without the vessel or permitted participant present. With the very limited LEO presence in PWS, this activity of illegal deployment of gear has been more prevalent. Now that the pot limit has been reduced to two pots per vessel, the practice of carrying more gear onboard has gained in popularity among the sport fleet.

There is also an existing regulation that is intended to limit the amount of sport fishing pots operated from any one boat;

5 AAC 55.022 (b) (5) (B) no more than five pots per person, with no more than five pots per vessel, may be used to take shrimp;

**The counter proposal** we would like the board to consider is to specifically limit, by regulation, the amount of sport pot gear that can be on-board **and** fished by a vessel. It is already required that deployed sport fishing pot gear must have the vessel identification on the buoy by regulation (5 AAC 75.035).

The intent would be to eliminate gray areas in the interpretation of existing regulation. Using terms like “unlimited” when allowing the carriage of spare and remotely deployable sport fishing gear enables the circumvention of existing regulatory intent, which is limiting the amount of gear used to sport fish for shrimp from each recreational vessel.



Our proposed alternative language would also eliminate the existing impediment to effective **enforcement** of the regulations. The outcome would include more effective management, since pot limits are the only tool currently used to manage the allocated sport GHL. The following is suggested language;

5 AAC 55.055. (a) (3) (C) no more than five pots in total per vessel may be used to take shrimp[, **REGARDLESS OF WHO OWNS OR IS OPERATING THE VESSEL.**]

5 AAC 55.055. (a) (3) [(D) **PARAGRAPH (C) ABOVE SHALL BE INTERPRETED TO PROHIBIT CARRYING OF SPARE POTS OR DEPLOYING MORE THAN ONE VESSEL LIMIT OF GEAR.**]

### **PROPOSAL 240; SUPPORT with amendments**

Modify PWS shrimp pot harvest strategy from a static split, between noncommercial and commercial, to a tiered percentage depending on the total allowable harvest level (TAH).

The proposed allocation does not address equity in times of high abundance. The commercial sector continues to bear the full burden of conservation in times of low abundance. As proposed, this action would have no effect on the fishery, either in conservation or allocation.

This proposal would be **SUPPORTED if amended** to reflect an equitable sharing of the burden of conservation and appropriately allocates GHL as follows:

TAH < 110K = 35% commercial GHL  
TAH >= 110K = 40% commercial GHL  
TAH >= 140K = 45% commercial GHL  
TAH >= 170K = 50% commercial GHL  
TAH >= 200K = 55% commercial GHL

Although the Department may cite conservation reasons for establishing a minimum threshold for a commercial fishery to open in the management plan, it must be repeated that we are talking about a harvestable SURPLUS model. The GHLs for both commercial and non-commercial fisheries are calculated from the 90% confidence level of the TAH which is determined by the harvestable surplus model. This means that the amount of shrimp that can be harvested (TAH) is in excess of any necessary minimum amount to ensure brood stock levels, with an additional 10% reserve. Therefore, the surplus is, by definition, available to be harvested without impact to the resource.

By seeking a modest allocation of the surplus during times of low abundance, the commercial fleet further demonstrates a leadership role in conservation, in hopes that stocks would improve by leaving a portion of the surplus on the bottom. That is balanced by modest increases in available GHL in times of high abundance, where the market would benefit directly from available surplus shrimp product.



Currently, In times of low abundance, when a commercial closure threshold would be met, the allocation of resource goes completely and entirely to approximately 2500 sport fishers, with an effective allocation of 100% of harvestable surplus. This places undue risk on the future of the commercial fleet by allowing unrestricted harvest by the non-commercial sector in times of low surplus abundance.

#### **PROPOSAL 241; SUPPORT**

Shrimp defined: “Shrimp” means a member of the order Decapoda in Alaska to include the **shrimp** as a whole

ShrimpPros Association generally supports clear definitions in the regulations which aids in resource management and regulatory enforcement.

#### **PROPOSAL 242; SUPPORT**

Establish a minimum threshold of Total Allowable Harvest (TAH) for spot shrimp before allowing a non-commercial fishery in Prince William Sound

Proposals 240, 242 and 246 attempt to address the imbalance in the burden of conservation for this resource. A minimum threshold amount of 110,000 pounds harvestable surplus for a commercial fishery to commence is arbitrary and punitive to the commercial sector. If this minimum threshold is necessary to preserve the resource, then no harvest should take place until recovery has happened. It is not reasonable that a majority allocation would still be allowed to harvest, unlimited, when a minimum level of surplus is available. The current regulation punishes one user group with no burden of conservation for sport fishermen.

The amount of shrimp allowed to be harvested are a surplus, with a 10% buffer allowed for conservation. If any one user group is shut down from a lack of surplus, then all user groups should be shut down for the same reasons.

It would be just as equitable to have no minimum threshold amount (PROPOSAL 246) and let the Department close the entire resource if necessary, until a biologically determined surplus amount of shrimp is available, per the sustained yield guided, harvestable surplus model being used. This equally shares the burden of conservation among the user groups, whether the fishery is open or closed.

This proposal does not address subsistence use, and is not covered with this proposed common minimum threshold for having a fishery. Subsistence use has been determined to be 9,000-15,000lbs annually.

#### **PROPOSAL 243; SUPPORT**

Closed waters in Registration Area E.

Because the PWS Shrimp Management Plan requires a three-year rotation of the open commercial areas, fishing pressure is artificially concentrated in productive areas. This

re-alignment of the statistical area would allow commercial shrimp fishing in Columbia Bay, which is already open to sport fishing. This will help to reduce concentrated fishing pressure in the commercial administrative Area 1 when fishing happens in the zone every three years on rotation. This is approximately a 30 day window where Area 1 is open to commercial fishing during the rotation, so any perceived impact to this particular bay would be both minimal and short in duration.

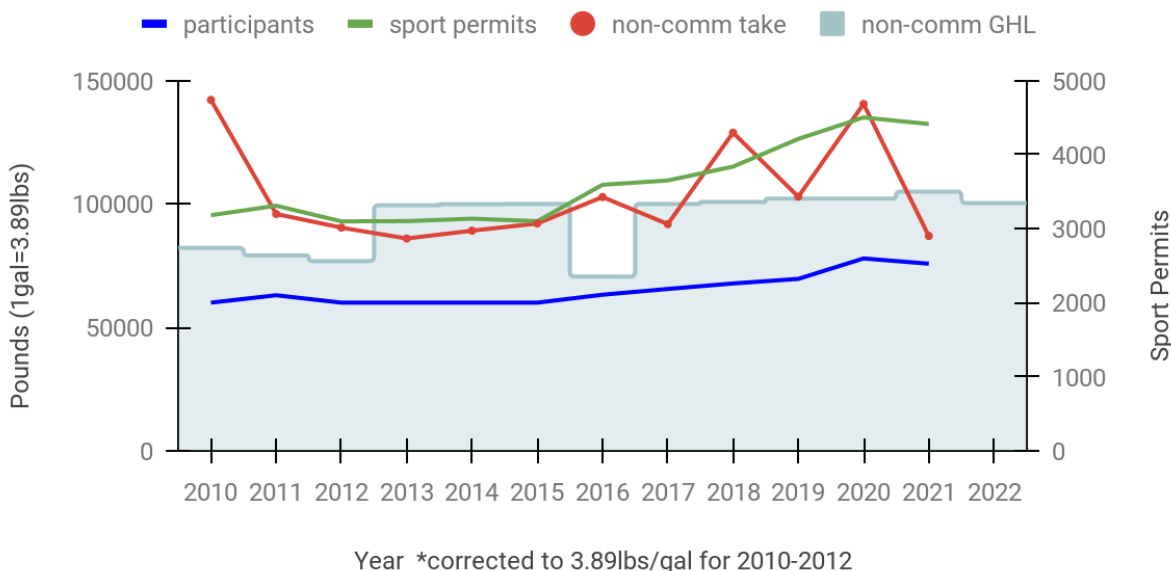
**PROPOSAL 244; SUPPORT**

Modify annual non-commercial shrimp guideline harvest level based on fishery performance in the prior season.

From 2010-2021, sport harvest has exceeded sport allocation half of the time. The last year of non-commercial GHL over-harvest in 2020, represented 56% of what the commercial fleet was allowed to take. In other words, the non-commercial fleet took all of their allocation, and then took an additional 56% of the commercial allocation, or 38,000 pounds more shrimp than they were allowed to take.

## PWS Non-commercial Shrimp Harvest

ADFG published data from fisheries reports



This proposal should be adopted because it would reinforce the PWS Shrimp Management Plan (5 AAC 55.055) and rightfully allow the non-commercial sector to catch their entire allocation, while permitting the Department to maintain their existing management strategy.

Although the Department may be against carry over of unharvested surplus from a prior year, there are no biological management reasons to hold back a future surplus harvest when a GHL target had been overfished in a prior year. This is purely administrative in nature, and would be applied to an already executed surplus model determined TAH.



This is the only way to ensure the Department manages the Board allocated GHL. It also allows the non-commercial sector to share in the burden of conservation of this resource, by not overfishing their allotment. This same concept is used for other fisheries with success.

The GHGs for both commercial and non-commercial fisheries are calculated from the 90% confidence level of the TAH which is determined by the harvestable surplus model. This means that the amount of shrimp that can be harvested (TAH) is in excess of any necessary minimum amount to ensure brood stock levels, with an additional 10% reserve. Therefore, the surplus is, by definition, available to be harvested without impact to the resource. However, constant over harvest by reporting sport fishers shows that half of the time, the GHG is exceeded by substantially more than the 10% factored into the surplus model.

This proposal would further benefit this fishery by allowing, in some years, the withholding of excess surplus to mitigate the impact of overfishing populations of shrimp. This proposal has zero impact on the existing allocation, since each user group is allowed to catch up to the GHG in total, but not allowed to take more than what was allocated.

#### **PROPOSAL 245; SUPPORT**

Modify annual commercial shrimp guideline harvest level based on fishery performance in the prior season

The commercial sector has consistently harvested up to the allocated GHG. Over the last eleven years of the fishery, carry over GHG from under-harvest would have occurred twice, in 2012 and 2015, as proposed. Every other year it has been managed to the GHG without over harvest.

This proposal should be adopted because it holds the commercial sector accountable to harvest only within their allocated GHG. It would also be possible because all surplus harvest model calculations are conservative and represent an abundance over what is necessary to achieve sustained yield. These GHG adjustments would be minor due to the tightly managed commercial fishery allocation by the Department, but ensures access to the available surplus, even when the commercial fleet is artificially contained within an administrative area, while the total calculated surplus TAH covers the entirety of the PWS fishing grounds.

#### **PROPOSAL 246; SUPPORT**

Eliminate the commercial shrimp fishery minimum total allowable harvest threshold.

The current regulation and management plan penalizes only one user group with an arbitrary minimum threshold for participation. The entire burden of conservation rests on the shoulders of the commercial fleet; representing the minority 40% allocation.



The GHs for both commercial and non-commercial fisheries are calculated from the 90% confidence level of the TAH which is determined by the harvestable surplus model. This means that the amount of shrimp that can be harvested (TAH) is in excess of any necessary minimum amount to ensure brood stock levels, with an additional 10% reserve. Therefore, the surplus is, by definition, available to be harvested without impact to the resource.

This proposal should be combined with proposal #240, to promote equity among user groups. Also, the Department should provide actual biological evidence that promotes this minimum surplus amount to be below a sustainable level, since by definition, it is a surplus. There is no biological benefit to leaving the minority commercial allocation of the surplus on the bottom at this magic amount of 110,000 lbs of surplus.

### **PROPOSAL 247; OPPOSE**

Establish a minimum pot limit to increase the pace of the commercial pot shrimp fishery.

This proposal would be detrimental to the value added, direct-to-market participants in the fishery, which rely on a longer harvest season. This would only benefit a small number of commercial participants and substantially reduce the earning potential for the remaining majority.

The Department has managed the commercial fishery to date with good results and this would remove fishery management options in the future.

### **PROPOSAL 248; OPPOSE**

Establish an earlier start date for the commercial shrimp trawl fishery.

Earlier than April 15 fishing for shrimp may take more egg-bearing females from the broodstock and would then directly impact the recruitment of more stock for future harvest.

### **PROPOSAL 249; SUPPORT**

Clarify areas open to commercial pot shrimp fishing in the Prince William Sound Area

This housekeeping proposal eliminates confusion and supports Department management.

### **PROPOSAL 250; OPPOSE**

Establish an earlier start date for the commercial shrimp pot fishery

The current Season start date is in alignment with the sustained yield management philosophy intending to avoid fishing during egg bearing periods. The current season dates avoid fishing when there are large percentages of egg bearing females, in order to protect broodstock.



However, it should be noted that the Department's reasons for opposing this proposal reveals a bias toward specific user groups, where non-commercial users have exclusive access close to the major ports, but the Department incorrectly claims that an earlier commercial start date would require further travel for non-commercial users.

**PROPOSAL 251; SUPPORT**

Establish permit and reporting requirements for shrimp floating processor vessels in the Prince William Sound Area.

**PROPOSAL 252; OPPOSE**

Allow vessels registered for the commercial shrimp fishery to also tender shrimp.

**PROPOSAL 261; OPPOSE**

Allow use of a ropeless system with submerged buoy in the Dungeness crab fishery

This technology is not ready for deployment and represents a severe burden to the fisherman and the environment, with no definitive biological benefits, only speculation and conjecture of perceived benefits. The failure rate and lost gear alone is enough of an environmental impact to cause any good stewards of the sea to question this approach.

Thank you for your consideration of these important comments from our membership.

Sincerely,

A handwritten signature in blue ink that reads "BWilbanks".

Brett Wilbanks, Chairman  
ShrimpPros Association