

## On-Time Public Comments

Cook Inlet, Kodiak, Westward, and Arctic Shellfish, Shellfish General Provisions, Prince William  
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February 15, 2022

Dear Board of Fish,

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.

Aaron Gerlovich  
55733



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February 18, 2022

Dear Board of Fish,

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.

Adam Galindo



March 07, 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.

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.

Adelbert Dewees

Oak Hill  
32759





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February 26, 2022

Dear Board of Fish,

Hello. Alan Frerich here We live in central Minn just south of where Kenei Keith Holman is from . We don't fish enough but love doing it . Mostly pan fish is what we go for . Responsibility is up to EVERYONE meaning ADFG and everyone else so please make it fair so the fish can get back up and reproduce. Also some day we are going to get back up there to do some fishing and looking around again thank you

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.

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.

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Alan Frerich

Oak park  
56357





February 17, 2022

Dear Board of Fish,

I have been living in Alaska since 1992 and I am an avid fisherman. I feel this proposal 283 is bad for the state.

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.

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.

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?

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Alan Paulson

Anchorage  
99516



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March 11, 2022

Dear Board of Fish,

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?

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Alden Chamberlain

Hotchkiss  
81419



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

February 14, 2022

Dear Alaska Board of Fisheries,

Can you please let the fish come here to the rivers and creeks, because the rivers here in Chignik Lagoon don't have that many fish? It is good for you to let more fish go up the river because then we will get lots more fish. The fish are good for catching. So all of you guys are good at catching fish but you are not thinking right because you are letting other people catch all of our fish. The people would be broke because there would be no fish to catch.

Fishes are good to be fried. Last summer my sister and my brothers were trying to catch fish. Then my sister and I didn't catch anything and my brothers didn't catch any fish either. It was the best time I caught a fish because my mom told me to try and try again. Then I caught one and it was fun because it made me feel like we need more fish for everyone.

Sincerely,  
Alec Billadeau  
3rd grader in Chignik Lagoon



# Aleutians East Borough School District

P.O. Box 429, Sand Point, Alaska 99661

Ph. 907-383-5222 FAX 907-383-3496

Serving the children in the Alaskan communities of:  
**Akutan, Cold Bay, False Pass, King Cove, and Sand Point**  
[www.aebbsd.org](http://www.aebbsd.org)



PC008  
1 of 1

March 10, 2022

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Comments on Proposal 282**

Chairperson Carlson-Van Dort and Board Members:

My name is Patrick Mayer and I am the superintendent of the Aleutians East Borough School District (AEBSD). By nature, I am an optimistic person, but I am very concerned about the future of education and the viability of our communities in the Aleutians East Borough (AEB) should the proposed changes surrounding proposal 282 (Area M salmon fishery) be approved.

The Aleutians East Borough was established in 1987. The articles of formation consisted of two priorities: Fisheries and the formation and support of a borough wide school system.

The original communities served by the Aleutians East Borough School District included Sand Point, King Cove, Cold Bay, Nelson Lagoon, False Pass, and Akutan. All schools in any community tend to be a focal point. Concerts, book fairs, extracurricular events, bake sales, local meetings and even church services take place at schools. Schools provide, especially in rural Alaska, an intrinsic tie between young and old as multiple generations have often attended and graduated from the same institution. It is a huge part of who we are as a community.

On the academic we provide a K-12 education for our students. We endeavor to prepare our students for life beyond high school by promoting the pursuing of a vocational education track or attendance at a four-year university. On the community side of the house, our students and families are very close. Families have been graduates of our AEBSD schools since they were opened. Banners adorn the walls of the gymnasiums and parents and community members fill the stands. Recently, I was able to be present to watch both King Cove School and Sand Point School depart for regional basketball. There was a spirit tunnel for the students to run through in King Cove and a pep assembly at Sand Point School. Both events were constructed to support the teams prior to their departure. Smiles were endemic and the excitement was contagious. *What would we do if the schools weren't there?*

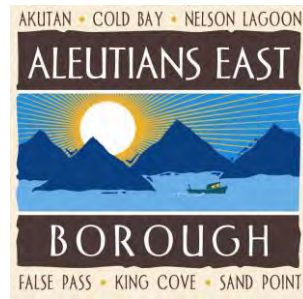
I am concerned for the stability and even the very existence of our communities in the Aleutians East Borough. Staggering inflation on an already high cost of living threaten to push people out. The communities in the Aleutians East Borough have historically been susceptible to diminished fishing allocations and fishing stocks which have directly impacted the local economies. Fish Taxes for our communities matter. There is an old saying that "when the school goes away, so does the community". Nelson Lagoon was closed in 2011 and Cold Bay in 2014 due to declining enrollment. For the first time ever, the enrollment at Sand Point School has dropped below 100 students. Throughout the Aleutians East Borough, we have been experiencing declining enrollment since 1990. This is in large part due to the decline of our fisheries and the associated downsizing of fish processing facilities.

Fisheries are the economy out here and any further restrictions will decimate much of the AEB. With the proposed changes being considered through proposal 282, we can only assume that this pattern of school closures and community devastation would continue. Please do not let our Aleutians East Borough communities slide off of the economic and educational cliff. Please do not support proposal 282.

Sincerely,

Patrick Mayer,  
Superintendent





March 11, 2022

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

RE: Aleutians East Borough Opposed to Proposal 282

The Aleutians East Borough encompasses the communities of Akutan, False Pass, Nelson Lagoon, Cold Bay, King Cove and Sand Point. The waters of the Borough also include the fishing areas outlined in 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan and in 5AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula. Our local fishermen, processors and communities would be severely negatively impacted by Proposal 282, that would needlessly further restrict salmon fishing in our region. The Aleutians East Borough urges the Board of Fisheries to reject this out-of-cycle, allocative proposal.

Proposal 282, as described by the Alaska Department of Fish & Game (ADFG) Staff Comments (RC 2), is allocative, and under Board policy should not have been elevated from an agenda change request to an out-of-cycle proposal, absent compelling new information. The reason for the proposed changes as stated in ACR 7, now Proposal 282, is to increase Chignik sockeye escapement. Chignik escapement has remained relatively consistent since 2018 and total Chignik escapement in 2021 increased compared to the previous 3-year average. There is a lack of new information for the basis of this out-of-cycle proposal.

As noted by ADFG Commissioner Vincent-Lang at the recent House Fisheries Committee, the Department will begin another round of genetics studies of the Area M fisheries, and take up a full review of escapement goals next year. It would be more appropriate for this proposal to be taken up in the normal cycle next year, when significantly more data will be available for the Board to make an informed decision. It would be a waste of Board time and resources to rush in making drastic changes to any management plan just to reevaluate the following year when more information is available, with possibly no benefit to Chignik stocks but at the cost of collapsing entire communities in Area M.

According to RC 2, Proposal 282 as written would reduce the three June salmon fishing openings in the Shumagin Section and Dolgoi Area beginning June 15, from 88 hours to just 40 hours each. In July, there would be a 49% reduction of fishing hours and all July openings would be just 18 hours. The restricted fishing times would be lifted only if the Department expects the mid-point of the Chignik early-run escapement to be met, which hasn't happened in 7 of the last 10 years.



It should be noted that the Dolgoi area and the Shumagin Islands Section are fishing areas just outside two of our largest fishing communities, Sand Point and King Cove. This proposal will directly impact local fishermen that normally fish in these areas and indirectly impact other Area M fishermen as fishers move to the other open areas. RC 2 states that Proposal 282 'would likely reduce the harvest of all species of salmon in the Alaska Peninsula Management Area' and 'likely result in increased gear conflicts between the purse seine and drift gillnet fleets'.

The new proposed salmon fishing restrictions would limit opportunity for local fishermen and processors to help harvest one of the largest forecast Bristol Bay salmon runs in history. This strain on the local and State economy would be without any significant boost to Chignik escapement. The WASSIP study shows that even in times of high abundance, harvest rates of Chignik-bound salmon in the Shumagins and Dolgoi are low, and insignificant in times of low abundance.

The current management plan is working. ADFG has emergency order authority and the Commissioner used this authority in 2018 and again in 2020 to curtail fishing in Dolgoi and the Shumagins when Chignik sockeye escapement was low. The Board amended the management plan in February 2016 establishing the Dolgoi Island Area and setting a sockeye harvest cap in the area. In February 2019 the Board closed the Dolgoi Area to seine vessels for all of June. Also in 2019, the Board realigned the set gillnet, drift gillnet and seine gear fishing schedules in June, resulting in 73% increased hours of closed 'windows' in June with no fishing nets in the water in the South Alaska Peninsula area. The Southeast District Mainland has remained closed to salmon fishing in June for the past 4 years. South Alaska Peninsula fishermen continually share in the burden of conservation for Chignik-bound salmon under the current management plan.

The Board of Fisheries should consider all submitted South Alaska Peninsula and Chignik proposals, including Proposal 282, during the regular upcoming 2022/2023 cycle. In the interim, the Alaska Department of Fish and Game has in-season emergency management authority and has used that authority appropriately as needed. Proposal 282 would needlessly restrict legitimate mixed-stock salmon fishing in the South Alaska Peninsula without benefit and outside the normal Board cycle process. The Aleutians East Borough urges the Board of Fisheries not to accept Proposal 282 at this time.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alvin D. Osterback'.

Alvin D. Osterback, Mayor

[aosterback@aeboro.org](mailto:aosterback@aeboro.org)



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February 25, 2022

Dear Board of Fish,

I am a life long born and raised Alaskan. My hope is that my 2 year old son will see a better fishery than I have!

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.

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.

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.

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.

Alex Carey



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February 22, 2022

Dear Board of Fish,

Long time fisherman out of Anchorage. Fish from the MatSu to the Kenai and Russian River. My interest is improving fishing opportunities for the disabled community. The more fish in the rivers and streams, better the opportunity for disabled Alaskans like my 36-year old son to go fishing and catch the occasional fish.

Kenai River king salmon have not been meeting spawning objectives for years. Proposal 283 allows the commercial harvest of kings when we haven't met the lower escapement goals. This smacks of the old joke about being unable to meet your standards: When your standards are too high, and you can't meet them, what do you do? Lower your standards. Which is the absolutely wrong thing to do.

This proposal prioritizes commercial fisheries over rebuilding the Kenai king run to historic levels. Passing this means that you have completely given up on rebuilding the run to historic level. Defeat this proposal

Alex Gimarc

Anchorage  
99515





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February 18, 2022

Dear Board of Fish,

I make the long journey from the east coast every few years to fish for salmon and trout because, in general, AK has done a fairly good job of protecting its fish stocks. Believe me, between lodges, hotels, guides, rental cars and flights I have spent more money than I care to total up. To me, king salmon are the tops when it comes to AK salmon fishing. However, I don't have to tell your fisheries experts that the king returns throughout AK are shrinking. Even the famed 100,000 plus runs on the Nush don't seem to be as reliable as they once were. That is why I have stopped fishing the Kenai, home of record breaking fish, for Kings. They are just too valuable. That is why proposition 283 is such a terrible idea. The thought of losing any more of these magnificent fish so that a few commercial operations can make more profit is not worth the risk. How about the hurt that could be put on the lodges, hotels, guide services and the jobs that they provide if the king stocks are further depleted? That is why I am against this proposition.

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.

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.

Alfred Schwentke

Windsor  
06095

Alfredo Aboueid  
F/V *Alaskan Frontier*  
P.O. Box 26  
Chignik Lagoon, Alaska 99565

January 18, 2022

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

Subject: Proposal 282 (ACR 7) and Chignik Red Salmon Management

Dear Alaska Fisheries Board:

I strongly support Proposal 282 (ACR7).

A reduction in fishing time in the Shumagins and Dolgoi area is needed when the Chignik early-run is not meeting the mid-point of its escapement goal.

Beginning in 2018, early-run reds entering the Chignik Management Area have consistently been fewer than that required for escapement. The Chignik late-red run has also experienced less than adequate escapement in two of our last four seasons.

It is well known that Area M in the Shumagins and Dolgoi harvest red salmon headed to Chignik in June and July. Cutting back the intensity of these fisheries would allow more red salmon into Chignik waters. The time is right for this. Chignik depends on the two Chignik River red runs economically and culturally. Chignik needs the Board to intervene to prevent any further damage. Our runs have been compromised and need to be built back. A start is to make certain that escapements are achieved on both runs. Passing Proposal 282 is the minimum that should be done.

In addition to reducing interception impacts on Chignik red salmon in Area M, Chignik deserves the best science applied for inseason management and post season analysis. That is not occurring. Chignik commercial fishermen are paying for genetic sampling of Chignik's two runs, but the department is opposed to using the data for inseason management which I believe should be a high priority project. The Department does use the July genetic samples post season for assigning escapement numbers by run but not the August sample results which is unreasonable. Board oversight is needed along with improved collaboration between ADF&G and Chignik stakeholders and their representatives.

Thank you for considering my input.

I am, *Alfredo Aboueid*





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February 17, 2022

Dear Board of Fish,

I do not support lowering the king salmon escapement. King Salmon populations are already distressed!!!

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 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.

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allen Walburn

Larsen Bay  
34102



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February 25, 2022

Dear Board of Fish,

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.

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.

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.

Alley Stanley  
Haskell  
79521



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February 16, 2022

Dear Board of Fish,

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Ally Yeats

Bluffdale  
84065





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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I live in Chignik Bay and everyone in our community is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. The mainstay of our economy is our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Aloys Kopun*



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March 02, 2022

Dear Board of Fish,

I was born, raised, and currently live in Anchorage. My dad owns a cabin in Sterling where he lives during the summer. We have fished up and down the Kenai River from the mouth dipnetting to Centennial Park, the Russian-River Ferry, and the middle-upper Kenai on various float trips. I make trips to the Kenai every single weekend during the runs, but I have been alive in this state for all 25 years of my life and never once caught a king salmon on the Kenai. Bi-catch from commercial vessels is unavoidable, and so we cannot all capitalism and increased commercial demands to dictate our state's vital resource management. A balanced, and responsible resource management plan for our fisheries is extremely important to me. To allow my family to continue to catch fish to feed us through will so we don't have to buy as much red meat, and so that I can pass on this way of healthy living from the gifts of the land to future generations.

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.

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Amanda Allard

Anchorage  
99515



Submitted By  
Amy Foster/Jack Foster Jr  
Submitted On  
3/11/2022 11:49:03 PM  
Aff at on

Phone  
907-383-3633  
Ema  
[amyfoster5@yahoo.com](mailto:amyfoster5@yahoo.com)

Address  
P. O. Box 254  
Sand Po nt, A aska 99661

Amy and Jack Foster Jr

P. O. Box 254

Sand Po nt, A aska 99661

March 11, 2022

Aaska Board of F sher es

Subject: Proposa 282. Oppos t on to Proposa 282

The mp cat ons of Proposa 282 and the dramat c consequences f the proposa s fru tfu w be davast ng to our v hood and f shery. My husband and I are both Area M Set net perm t ho ders, who n the past have been forced out of a oca f sh ng area, the SEDM due to regulat ons set forth upon our f shery from another area, Area L, and now restr ct ng us as wr tten n the proposa , cutt ng our f sh ng t me n the Shumag n ls ands by more than 50%. Forc ng us to work n unpred ctab e weather, strong currents and rough seas, w th the major ty of us work ng n open sk ffs that are 18 to 21 feet n ength w th nets attached to the shoreward s de of the rocky beach. Three forty hour open ngs n June w devastate the set net f shermen from mak ng a susta nab e v ng or be ng ab e to beg n the start up of f nanc ng a f shery ( nsurance, fue , boat and gear ma ntenance, grocer es, etc) under the current nguage of the proposa . Last summer dur ng the month of June 2021 my husband and I stugg ed to catch a sa mon to de ver w th 10,000 pounds of a spec es be ng de vered dur ng the ent re month of June. Th s trend a so transp red w th many other set net f shermen. For the proposed 18 hour per ods n Ju y, I tru y wonder w th a the unknown var ab es of weather, t des f we wou d be ab e to sp ash our nets n the water. It can take between 2 to 4 hours to set the nets dur ng an opener and we usua y beg n tak ng the nets out of the water depend ng on the weather 6 hours but norma y 4 hours before the cose of the f sh ng per od. That equates to 18 m nus 10 to 6 hours equa s 8 to 12 hours of our nets cons stent y f sh ng n the ocean waters. Th s s not feas b e nor an adequate so ut on to our f shery.

My quest on s there any new ev dence of nformat on prov ded w th escapement eve s n the Ch gn k area n regards to escapement due to the fact that escapements have been re at ve y cons stent the past f ve years. In the past, Board act ons were addressed, through emergency order for conservat on on the Ch gn k run wh ch n turn hurt us as f shermen n our area. G ven th s author ty n 2018 and 2020, there s no conservat on need to a ter Area M Management p ans n an out of cyc e meet ng, know ng that the departments forecast for the Ch gn k runs w meet the r escapement goa s n 2022. Th s proposa 282 reads as an a ocat on proposa and not a conservat on proposa , ead ng back to more than 40 years of Ch gn k f shermen advocat ng for restr ct ons on the Area M South Pen nsu a F shery n order to ncrease f sh ng opportun tes n Area L when many years there were abso ute y no conservat on ssues or concerns w th n the f shery. Th s ssue w be further ta ked about n the 2023 meet ng of the board of f sher es.

W th n the Ch gn k Watershed s the r a dec ne n the smo t cond t ons assoc ated w th hab tat degradat on, s the r an ssue w th nutr ent nput, anoma ous ocean cond t ons, poor smo t cond t ons, unusua env ronmenta cond t ons or product on ssues w th n the r ver system of outm grat ng Ch gn k smo ts? Restr ct ons n an out of area f shery such as the Shumag n ls ands cannot remedy these prob ems or mater a y ncrease returns to Ch gn k.

By cons stent y po nt ng f ngers and b am ng our area s unw se by a ter ng a mangement area n Area M that has severe y e mated and mpacted one area of s gn f cance the South East D str ct Ma n and area, recent y the Do go area and now try ng to take the Shumag n ls and area a negat ve y affect ng the v hood of myse f, my fam y, my commun tes, bus nesses and oca y estab shed f shermen by tak ng away more areas sn't the correct answer to the s tuat on at hand.

A quest on I have to ask w th Proposa 282 s th s a conservat on ssue, an a ocat on ssue or s t a d scr mat on ssue of what has been transp r ng throughout the years n regards to our f shery. Look at a the sc ent f c data, our ecosystem, our current changes n env ronmenta cond t ons. Our ocean s huge, spread ng upon hundreds of thousands of m es and notab ey not a the f sh trave up to one watershed, the r are numerous sa mon streams at every corner you turn w th n these s ands and ma n and.

We are f shermen our commun ty s dependent upon f sh ng and any changes to reduce oru f sh ng t me or restr ct us from f sh ng s detr menta to our v hood. I ma ask ng the BOF to reject or take no act on Proposa 282 at th s meet ng.

Amy and Jack Foster Jr





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March 09, 2022

Dear Board of Fish,

Fishing for Kings on the Kenai is one of our families favorite memories. We did catch and release and did not harvest. Why let commercial fishermen ruin 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.

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.

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.

Amy Annanie

Nine Mile Falls  
99026



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March 08, 2022

Dear Board of Fish,

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.

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.

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.

Andrea Nykamp

Anchorage  
99507



Submitted By  
Andrew chadwick  
Submitted On  
2/13/2022 7:27:30 PM  
Affiliation  
Guide

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Seldovia, Alaska 99669

The idea to give the east side set nets, known as kongs, to be in the water when the kenai river is set for another year of under escapement is a travesty to one of the most important sport fisheries in the state. As an inriver user sport fish guide who has volunteered my time to help with the kenai and kongs of the river for many years, I know from thousands of hours of onriver experience that when the set nets go out the numbers of kong salmon returning to the river falls drastically. If we want to save this fishery we should be further reducing set net hours, not increasing them! The end result is that east side set net fishery is no longer sustainable!

"PROPOSAL 283... AGAINST. At a time when late run Kenai chinook are at historic lows, this simply is the wrong proposal at the wrong time. Board members, ask yourselves... why even consider going down this path when the entire unfished run-size failed to scratch the lower bound SEG in the past three years? Bottom line, Kenai kongs are in trouble. It is incumbent upon you to do EVERYTHING in your power to increase the numbers. If anything, you should be giving ADFG even MORE prescriptive guidance to achieve escapements spread within the full range of the OEG to help restore the iconic Kenai kongs to historic abundance... NOT letting them fall through the escapement floor! In contrast, this ill-conceived proposal seeks yet again to LOWER the conservation bar for a horribly depleted stock... but wait, only for the "special" people. A double standard for conservation is the last thing the late run kongs need. This foolish proposal only increases the risk that the conservation objective WILL NOT BE MET in 2022. If that should occur, four consecutive years of escapement failure is certain to place this population in a "stock of concern" status. Do you really want that blood on your hands? Please.... JUST SAY NO!



Submitted By  
Andrew  
Submitted On  
3/1/2022 9:44:07 AM  
Affiliation  
Professional sports guide & concerned citizen

Phone  
Chadwick  
Email  
[Chad0050@gmail.com](mailto:Chad0050@gmail.com)  
Address  
48313 Rustic Ave  
Soldotna, Alaska 99669

We need to do everything we can to save our Kenai kings. Guides and sportsman are willing to give up fishing for them. Commercial fishers, who comparatively take more kings than the sport should not be allowed to place and scramble king king set nets when the run forecast is so low that it states closing the river to sport fishing.

The 600 foot fishery is assumed to take proportionally fewer kings than sockeye.... that is the whole impetus to use it, right?

But does it?

The days when we fished the full foot ESSN's (July 19) vs full foot 600 ft (July 20) during the same stat week last year, there was no preferential chook savings by going to 600 ft...

Proportionately ~500 sockeye per chook were harvested with either strategy!

When the 600 ft rule was inserted into the management plan, it was assumed that would allow more sockeye harvest while dodging the majority of king salmon that were assumed to swim in deeper water as they approach the river mouths...

As it turns out, we were dead wrong.

Rather than saving kings salmon, the 600 ft rule is effectively just keeping extra full foot ESSN hours beyond the weekly cap.



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February 22, 2022

Dear Board of Fish,

To even consider allowing extra commercial set net fishing hours at a time when the in river fishery for king salmon is closed is a travesty to the most important sport fishing river in the state of Alaska. The kenai river sport fishery and the tourism it brings in is the life blood of the kenai/Soldotna area. Not set netting.

In times of such low abundance to allow set nets in the water which indiscriminately kill many king salmon each opener will completely undo any savings that would be made in river by closing the sport fishery.

When the run is so bad that the state mandates closing sport fishing it is imperative to keep the #1 enemy of king salmon-set nets OUT of the water.

As an in river user I can tell from thousands of hours on the river that when the set nets go out the next 3 tide cycles are a near ghost town for fresh incoming king salmon. We need to be giving every single returning king salmon an opportunity to spawn, and that means keeping the set nets off the beach.

Also, we have seen it each even numbered year. The sonar counts will be high as a reflection of high pink salmon numbers. We must not allow this to be used as justification to allow extra netting. These next few years are extremely important as the entire future of the kenai river king salmon run is hanging on by a thread. We can not allow the loss of any additional king salmon, be it to sport harvest or nets.

We must save this fishery and do whatever we can to bring these fish back. If that means no nets and no sport harvest so be it! If we don't do something now- we will loose these fish forever.

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 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?

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.

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.

Andrew Chadwick

Soldotna  
99669



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February 25, 2022

Dear Board of Fish,

Allowing the nets in will be the final nail in the coffin for Kenai River kings. On pink years the sockeye counter reflects the large numbers of pinks onto the sockeye count and over counts sockeye by a wide margin. The commercials will use this margin of error to allow the nets to go in. 1 or two set net opener will kill more kings than an entire open season of catch and release. If there's not enough kings for the sport fleet to even catch and release there are not enough for the commercial!

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.

Andrew Chadwick  
Soldotna  
99669



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March 07, 2022

Dear Board of Fish,

Just vote no! There is no amount of set net money that justifies decimating the last remaining king salmon we have on a year with a run so weak that justifies a complete closure of the in river fishery.

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.

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.

Andrew chadwick  
Soldotna  
99669





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March 08, 2022

Dear Board of Fish,

The 2022 pre season forecast is for the lowest king run in recorded history.

Why would managers want to allow indiscriminate king salmon killing set nets in the water when we should be doing everything possible to try and rebuild the run?

Allowing a few more set net openings will make the setnetters a negligible amount of money but will cost the kenai river big time when it comes to its increasingly rare king salmon!

Do not allow the nets in if the run is so low sportsfisherman can not 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.

Andrew chadwick  
Soldotna  
99669



Submitted By  
Andrew Manos  
Submitted On  
3/11/2022 8:55:29 PM  
Aff at on

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Madam Chair, member of the board

This submission regards to proposal 282. I don't not believe that the ACR that generated this proposal met the criteria to be taken up out of session at this meeting. Any issues of conservation can and has been addressed by in season emergency order. ADFG and is fully aware and attentive issues of conservation with Chignik salmon runs. The department has acted twice in recent history to stop the area M salmon fishery when they had concern over the Back Lake sockeye salmon run. This is an alternative proposal that has no business in an out of cycle session.

By taking this up out of cycle the board has significantly decreased the opportunity for public engagement. As an out of cycle proposal the board is not able to engage all available tools to make a meaningful impact for the Chignik fishery. There are no alternatives available from which to choose the best path forward. As we heard from the department during deliberations, they were not planning and have not had time to compile all the data necessary to make an informed decision.

To speak directly to proposal 282, what is being proposed has no clear benefit for Chignik but has a huge negative impact for area M fishermen. I agree the fishermen from Chignik that there is a problem, and I empathize with any fisherman that has to sit on the beach and watch a season go by. We have been shutting portions of area M down since 2015 and so far it has not seemed to help. This is not the time to throw another dart at the map and hope the problem goes away. This is the time to engage the scientific tools at the council's disposal and find a meaningful effective solution. In this situation I do not believe that hurting the communities of Sand Point, False Pass, King Cove, Cord Bay, and Nelson Lagoon will do anything to help the community of Chignik. If this board genuinely wants to help a community that needs help, they need to identify what is actually causing the harm.

Sincerely

Andrew Manos



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February 18, 2022

Dear Board of Fish,

I've fished the upper Kenai predominately for the last 25 years and I'm seeing some improvement in the numbers of King Salmon breeding in the creeks that feed into Kenai lake. I take that as a positive sign that things are trying to turn around. It may take 5-6 years before we are able to tell if the returns are better. Too soon to reverse any constraints on the commercial fishing.

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.

Andrew R. Pulliam

Palmer  
99645



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February 16, 2022

Dear Board of Fish,

The problem is that the present mismanagement of the Kenai River king salmon is depleting the run as well and that's from data going back to the 90s. It just keeps getting worse and worse on the return numbers and is basically at the point now that you can't really catch a sport caught king salmon and keep it in the Kenai River. Obviously prop 283 is bad and should have never even gotten to a proposal but big money keeps talking louder than the importance of huge Kenai River king salmon for us people. They need to fix the problem by stopping commercial fisheries from taking the last King salmon whether it's by stopping the high seas bycatch raping, pillaging and wasting by the huge trawlers and or to intercepting the kings in the east side set nets in the name of red salmon but certainly not returning to the present mismanagement system which is continually depleting the run as well! Talk about choosing between two losing solutions! Either way we lose! Wow! Thanks!

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.

Andy Cizek  
Soldotna  
99669



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February 24, 2022

Dear Board of Fish,

My wife and I have a home on the Kenai River and have fished on the Kenai every year since 1989. The king salmon runs are way down in quantity and in size of fish. By allowing commercial fishing to further shrink the size of the king salmon run on the Kenai you will endanger the long-term health and viability of an important economic driver of the Kenai Peninsula.

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.

Andy Tallman

Kenai  
99611



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March 08, 2022

Dear Board of Fish,

I am the owner-operator of a wilderness fishing lodge north of King Salmon. I now tell our clients it is unlikely they will catch a king, and even then, they will have to release it. No one should be killing any kings in Bristol Bay, we are on the brink of extinguishing them. Why would you even consider giving anyone the opportunity to kill a wild king salmon at the present time? The probable extinction of wild kings is happening on your watch.

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.

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.

Anthony Behm

Honolulu  
96825-1137





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March 11, 2022

Dear Board of Fish,

I live in Kenai, Alaska. Fishing is important to us as a way of life and substance for our families. To maintain the ecosystem balance we must keep our fish protected and keep a sustainable population of fish to continue year after year.

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 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.

April Hall

April Hall

KENAI  
99611



Area M Seiners Association

Comments on Proposal 282

Commercial, Personal Use, Sport, and Subsistence Regulatory Proposals

Committee of the Whole—Groups 1-3

for the

Statewide All Shellfish (Except Prince William Sound, Southeast, and Yakutat) and Prince William Sound Shrimp Only

Alaska Board of Fisheries Meeting, Anchorage, Alaska

March 26—April 2, 2022

The Area M Seiners Association submits these comments on Proposal 282 before the Alaska Board of Fisheries at its March 26-April 2, 2022, Anchorage Meeting. Proposal 282 is an out-of-cycle proposal to restrict Area M fisheries in the Dolgoi Island Area and Shumagin Islands Section. The rationale for Proposal 282 is that such restrictions are necessary to address a conservation concern regarding the early run of sockeye salmon in Chignik (also known as the Black Lake run). The restrictions would be imposed from June 15 to July 25 unless the Black Lake run is expected to meet the midpoint of its current Biological Escapement Goal or a commercial salmon fishery opens in Chignik.

The Board should reject Proposal 282 for the following reasons, among others:

- **Proposal 282 Is an Allocation Proposal.** As the Alaska Department of Fish and Game (Department) has recognized, Proposal 282 does not address a conservation concern and, to the contrary, is an allocative proposal.<sup>1</sup> When the Department granted Agenda Change Request (ACR) 7 and placed Proposal 282 on its agenda, the best available information indicated that the Black Lake run had not met its Biological Escapement Goal (BEG) for four years. However, updated data from the Department show that the run met its BEG in 2019. Moreover, while escapements in 2018, 2020 and 2021 were below the BEG range, additional analysis of historical escapement data shows that they were well above a Sustainable Escapement Threshold (SET), a level at which the run has consistently demonstrated an ability to sustain itself.<sup>2</sup> In addition, after the Board accepted ACR 7, the Department released its preliminary 2022 forecasts, in which it is projecting a return to Black Lake of 639,000 sockeye, allowing for escapement of 400,000 sockeye (the midpoint of the current BEG range) and a

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<sup>1</sup> RC 2, Alaska Department of Fish and Game, Staff Comments on Commercial, Personal Use, Sport, and Subsistence Regulatory Proposals, Committee of the Whole—Groups 1-3, for the Statewide All Shellfish (Except Prince William Sound, Southeast, and Yakutat) and Prince William Sound Shrimp Only Alaska Board of Fisheries Meeting, Anchorage, Alaska, March 26—April 2, 2022 at page 123 (Regional Information Report No. 5J22-01) (hereafter, RC 2).

<sup>2</sup> See Appendix A.





harvest in Chignik of 239,000 Black Lake sockeye.<sup>3</sup> This new information, which was not available to the Board when it accepted ACR 7, makes clear that there is no conservation concern for the Black Lake run under the Board's policy, set forth in regulation, for management of sustainable salmon fisheries (which defines a "conservation concern" as a chronic inability to meet a sustainable escapement threshold over a period of four to five years). Because it is now clear that Proposal 282 is a purely allocative proposal, it should not be used to re-write Area M management plans at an out-of-cycle meeting in contravention of Board policy and regulation.

- **Further Restrictions on the Dolgoi Island Area Fishery Will Not Result in Material Increases in the Black Lake Run.** Since the Western Alaska Salmon Stock Identification Program (WASSIP) study in the mid-2000s, the Board has reduced fishing time in both the Dolgoi Island Area and Shumagin Islands Section,<sup>4</sup> placed a cap on harvests in the Dolgoi Island Area,<sup>5</sup> and, in 2019, altered the June fishing schedule and excluded purse seine vessels from the Dolgoi Island Area (as a result of which most fishing in that Area is now by set netters).<sup>6</sup> In addition, in 2018 and 2020, in response to low Chignik returns, the Department used its Emergency Order (EO) authority to further restrict fishing hours in both the Dolgoi

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<sup>3</sup> Preliminary 2022 Westward Region Salmon Forecasts, ADF&G Advisory Announcement for Immediate Release: 12/14/2021, Table 2.

<sup>4</sup> The June management plan that was in effect when the WASSIP study was conducted was adopted by the Board of Fisheries in February 2004. That plan established a fishing schedule that began at 6:00 AM on June 7 and ended at 10:00 PM on June 29. Fishing periods were 88 hours in duration interspersed by 32-hour closures, except for the final fishing period of 64 hours. This schedule provided 416 hours of concurrent opportunity for all gear types (set gillnet, purse seine, and drift gillnet). E. Fox *et al.*, South Alaska Peninsula Salmon Annual Management Report, 2020, *etc.* at 4 (ADF&G Regional Information Report No. 4K21-01 (Nov. 2021)) (hereafter, 2020 South Peninsula Mgmt. Rpt.). In 2013, the Board modified the June schedule for purse seine and drift gillnet gear by delaying the start date to June 10, which reduced fishing time by 64 hours. *Id.*

<sup>5</sup> In 2016, the Board established a harvest trigger for the Dolgoi Island Area, as defined in WASSIP, for the period from June 1 through July 25. Once 191,000 sockeye are harvested in that area, based on fish ticket information, the portion of the West Pavlof Bay Section south of Black Point (statistical area 283-26) and waters of the Volcano Bay Section (statistical areas 284-37 through 284-39) are closed to commercial salmon fishing through July 25, although portions of the West Pavlof Bay Section south of Black Point (statistical area 283-26) may reopen to commercial salmon fishing on July 17. *Id.*

<sup>6</sup> In 2019, the Board modified the June management plan so that the first commercial fishing period would begin on June 6 at 6:00 AM and close at 10:00 PM on June 8, a 64-hour fishing period for set gillnet gear only. Beginning at 6:00 AM June 10, all gear types are allowed to fish for an 88-hour fishing period that ends at 10:00 PM on June 13. That fishing period is followed by a 32-hour closure for all gear types. The commercial salmon fishery then reopens for three more 88-hour fishing periods, followed by closures of 32 hours each. The final commercial fishing period in June ends at 10:00 PM on June 28. *Id.* at 4-5. In addition to modifying the fishing schedule, the modified the management plan to close the waters of the Volcano Bay Section of the Southwestern District (statistical areas 284-37 through 284-39), the Belkovsky Bay Section of the Southwestern District (statistical area 284-42), excluding those waters inside of a line between Voaponni Point and Bold Cape, and the South Central District (statistical areas 283-15 through 283-26) to purse seine gear. Except for the excluded waters within the Belkovsky Bay Section, this closure corresponds to the Dolgoi Island Area as defined in WASSIP; that is, the purse seine fleet has been excluded from essentially all of the WASSIP Dolgoi Island Area. *Id.* at 5.



Island Area and Shumagin Islands Section.<sup>7</sup> The Department retains that authority and can exercise it if necessary in 2022.

As a result of these measures, recent harvests in the Dolgoi Island Area have been low, especially in June when, according to WASSIP, the Black Lake run is more likely to contribute to the harvest:

Dolgoi Island Area Sockeye Harvests <sup>8</sup>		
Year	June	July
2018	11,941	42,698
2019	30,993	132,835
2020	2,521	65,765
2021	10,830	152,496
<i>Average</i>	<i>14,071</i>	<i>98,449</i>

Further reductions on these already low harvest levels, which will fall most heavily on the set net fleet, will not result in material increases in the Black Lake run. Moreover, the Department has stated that it is not yet able to evaluate the effect of the modified fishing schedule and the exclusion of the seine fleet from the Dolgoi Island Area that the Board adopted in 2019. The Board should not impose additional restrictions on the small Dolgoi Island Area fishery when it is not yet able to evaluate the effect of these management measures, especially the exclusion of the seine fleet from that area in 2019.

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<sup>7</sup> In 2018, the Department reduced the last two openings in June from 88 to 40 hours for a total reduction of 96 hours for all gear types. In addition, the Department did not open portions of the Dolgoi Island Area during the July 14, 18 or 22 openings due to the poor early run in Chignik. This reduced fishing in those portions of the Dolgoi Island Area by 108 hours. *Id.* at 47-48 (App. A16); *see also* Memorandum from Dawn Wiburn to Nick Sagalkin re 2018 Chignik Salmon Season Summary at 4 (ADF&G Oct. 2, 2018) (“In response to the poor 2018 Chignik river sockeye salmon early run, unprecedented management actions were taken by the department in the Area M South Unimak and Shumagin Islands fishery. The department again took action in the post-June fishery (Mid-July) by leaving a portion of the Dolgoi Island Area closed during scheduled fishing periods.”). The area that remained closed comprised the waters of the Volcano Bay Section of the Southwestern District south and east of a line from Arch Point to a point on the Belkofski Peninsula and the portion of the West Pavlof Bay Section of the South Central District south of Black Point. *See* E. Fox *et al.*, South Alaska Peninsula Salmon Annual Management Report, 2018, *etc.* at 47-48 (App. A16) (ADF&G Regional Information Report No. 4K19-01 (Jan. 2019)) (hereafter, 2018 South Peninsula Mgmt. Rpt.).

In 2020, although the 191,000-fish trigger was not reached in the Dolgoi Island Area, the Department closed the area to all remaining openings on June 13 and reduced the last two openings in the June Shumagin Islands fishery to 40 hours each. This reduced fishing hours in the Dolgoi Island Area by 264 hours and reduced fishing hours in the Shumagin Islands by 96 hours. The Department took these actions because, on June 13, the Chignik River sockeye escapement was the second lowest recorded escapement in the history of the Chignik River weir operation.<sup>7</sup> Due to continued low escapement of sockeye to the Chignik River, the Department kept the Dolgoi Island Area closed through July, or a reduction of 249 fishing hours in that area. 2020 Alaska Peninsula and Aleutian Islands Salmon Season Summary at 5 (ADF&G Advisory Announcement Dec. 2, 2020).

<sup>8</sup> RC 2 at 132.

- **Further Restrictions on the Shumagin Islands Section Fishery Will Not Result in Material Increases in the Black Lake Run.** According to the WASSIP study, the harvest rate on the Black Lake run in the Shumagin Islands Section is in the single digits.

Harvest Rates on Black Lake Subregional Reporting Group in the June and Post-June Fisheries by Area Strata as Reported in WASSIP <sup>9</sup>						
Area Stratum	2006		2007		2008	
	June	Post-June	June	Post-June	June	Post-June
Shumagin Islands	5.4%	1.6%	2.3%	1.4%	3.7%	1.0%
Dolgoi Island	12.6%	1.6%	2.3%	2.4%	1.6%	0.4%

It is important to note that, as reported in WASSIP, these rates were biased high.<sup>10</sup> However, even with that bias, the harvest rates on the Black Lake run in the Shumagin Islands Section are similar to those that the Board has previously determined do not present conservation or allocation concerns. For example, in Finding 2004-229-FB, the Board found that similar harvest rates of perhaps 4 to 7 percent “would mean that roughly 95% of each run was subsequently available to commercial, sport, and subsistence harvests in more terminal locations.” (*Id.* at 4.) The Board “agree[d] with prior boards” that found that the impact of such harvest rates “is negligible” and “would not produce detectable results or measurable benefits” in terminal areas. (*Id.*)

The same is true here: given the low harvest rates on the Black Lake run, the impact of the Shumagin Islands fishery on the Black Lake run is negligible and reducing the sockeye harvest in that fishery would not produce detectable results or measurable benefits to the Black Lake run. This is especially true in years of record-breaking Bristol Bay sockeye runs and low returns to Black Lake, such as 2021. According to the WASSIP study, Bristol Bay runs are the dominant contributors to the June fishery in the Shumagin Islands in most years and time strata:

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<sup>9</sup> C. Habicht et al., Harvest and Harvest Rates of Sockeye Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2006-2008 at 731-33 (Appendices F64-F66) (ADF&G, Special Publication No. 12-24 (Nov. 2012)) (hereafter, WASSIP, SP 12-24).

<sup>10</sup> According to WASSIP, “when considering harvest rates, it is important to recognize that they are likely overestimates of true harvest rates. This is because our estimates of stock-specific escapement are almost certainly biased low (see Eggers et al. 2012) and we are also unable to account for harvest of WASSIP stocks outside of the WASSIP area. Each of these contributes to estimates of stock-specific total runs (denominator in harvest rate calculations) that are biased low, which results in harvest rate estimates which are biased high.” *Id.* at 35.



Mean Percentage Contributions of Black Lake and Bristol Bay Sockeye to Harvests in the June Shumagin Islands Fishery as Reported in WASSIP <sup>11</sup>			
Year	Temporal Strata	Black Lake Percentage Contribution	Bristol Bay (All Subregional Groups Combined) Percentage Contribution
2006	Stratum I (6/7-6/13); H=105,366	7.1%	46.0%
	Stratum II (6/14-6/20) H=176,663	28.8%	49.1%
	Stratum III (6/22-6/29) H=159,219	9.2%	61.4%
2007	Stratum I (6/7-6/13); H=118,519	1.0%	80.2%
	Stratum II (6/14-6/20) H=310,690	0.2%	89.3%
	Stratum III (6/22-6/29) H=422,989	3.3%	89.4%
2008	Stratum I (6/7-6/13); H=0 <sup>12</sup>		
	Stratum II (6/14-6/20) H=309,801	3.5%	85.5%
	Stratum III (6/22-6/29) H=339,204	4.7%	73.9%

As these data indicate, the contributions from the Bristol Bay runs far outweigh the contributions from the Black Lake run. The dominant contributions from the Bristol Bay runs were especially evident in 2007, when they contributed from 80% to 90% of the harvests

<sup>11</sup> T. Dann *et al.*, Stock Composition of Sockeye Salmon Harvests in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2006-2008 at 184-86 (App. D1-D3) (ADF&G, Special Publication No. 12-22 (Nov. 2012)) (hereafter, WASSIP, SP 12-22). “H” is the total number of sockeye reported to have been harvested in the Shumagin Islands fishery each temporal strata. *See id.*

<sup>12</sup> There was no fishing effort during this time stratum. *See id.* at 12.



compared to contributions ranging from 0.2% to 3.3% from Black Lake. A similar, although slightly less lopsided pattern was observed in 2008.

In recent years, there have been record-breaking Bristol Bay runs and low returns to Black Lake. Under these circumstances, it is reasonable to expect that the contributions of the Bristol Bay runs to the Shumagin Islands harvest would be even higher and the contributions of the Black Lake run would be even lower. This is borne out by the observation of Shumagin Islands fishermen, who have confirmed that the harvest was dominated by smaller Bristol Bay fish migrating to the west, with no evidence of larger Chignik fish migrating to the east.

In a mixed-stock fishery, the presence of multiple stocks buffers impacts on any one stock, especially a weak stock.<sup>13</sup> Given the dominance of Bristol Bay runs in the Shumagin Islands fishery, the low harvest rates on the Black Lake run documented in the WASSIP study, and the recent record-breaking Bristol Bay runs, further restrictions on the Shumagin Islands fishery are not necessary to protect the Black Lake run, especially since the Department retains its EO authority in the event of unusually low sockeye returns to Chignik.

Further support for this conclusion is found in the fact that the restrictions imposed on mixed-stock fisheries in areas east and west of Chignik have not helped the Chignik runs. There is no evidence that the restrictions imposed on fisheries in Cape Igvak, the Southeast District Mainland, the Dolgoi Island Area and the Shumagin Islands District in recent years have resulted in material increases in returns to Chignik. Department managers report that, when the Department has used its EO authority to reduce Area M fisheries in recent years, they have not detected any increase in Chignik returns.

- **The Recent Low Returns of the Black Lake Run Are Not Due to Area M Fisheries; They Are Most Likely the Result of Environmental Factors that Cannot Be Cured by Restricting Area M Fisheries.** The Area M Seiners Association contracted ICF, an international consulting firm with substantial expertise in fisheries science and management (including expertise in Alaska salmon fisheries) to examine the causes of recent low returns of the Black Lake run. ICF's report, which it is submitting to the Board in response to Proposal 282, finds no evidence that Area M fisheries have caused recent low returns for the Black Lake run. Rather, ICF concludes that the most likely causes of relatively low returns in recent years are some combination of changes in freshwater habitat and/or anomalously warm ocean temperatures. Although there are some mixed signals regarding freshwater habitat, on balance the evidence indicates that the freshwater habitat remains productive. It is therefore reasonable to expect that run sizes will rebound as warm ocean temperatures abate. Indeed, as noted above, the Department's 2022 forecast is for a Black Lake return of 639,000 fish to Chignik, which would allow for escapement of 400,000 fish (at the midpoint of the BEG range) *and* a harvest of 239,000 Black Lake sockeye in Chignik. Because restrictions on Area M fisheries cannot in any event address the environmental causes of the recent low returns of the Black

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<sup>13</sup> See Appendix B (D. Lloyd, Relative Effects of Mixed Stock Fisheries on Specific Stocks of Concern: A Simplified Model and Brief Case Study (Reprinted from the Alaska Fishery Research Bulletin, Vol. 3 No.1 Summer 1996)).



Lake run, there is no need to impose further out-of-cycle restrictions on Area M fisheries under these circumstances.

- **Proposal 282 Reflects Hostility to Mixed-Stock Fisheries that Is Inconsistent with Alaska Law and Policy.** Proposal 282 is the latest in a long line of proposals from Chignik to reduce mixed-stock fisheries in Areas K and M. These proposals have targeted mixed-stock fisheries in areas to the east and west of Chignik in a misguided effort to increase fishing opportunities in Chignik, even in years when there were no claimed conservation concerns. The Chignik Regional Aquaculture Association, which has made or supported many of these proposals, states in its Mission Statement that it “strongly opposes all interception fisheries that target directly or indirectly on Chignik bound salmon,” regardless of the presence of a conservation concern.<sup>14</sup> This extreme and absolute position is all about allocation and not conservation and is contrary to the fisheries management philosophy of the Board and Department. If it were adopted by the Board, it would close multiple fisheries throughout the State, including the Western and Perryville fisheries in Chignik,<sup>15</sup> and completely undermine the State’s position in Pacific Salmon Treaty negotiations. Indeed, when Canadian reports recently took aim at Southeastern Alaska salmon fisheries for intercepting British Columbia-bound salmon stocks, Department Commissioner Vincent-Lang called the reports an “unfair and biased attack on Alaska salmon fisheries” and a “special interest hit piece.”<sup>16</sup> As similar attacks, such as Proposal 282, are leveled against Area M fisheries, it is important to remember that mixed-stock fisheries are far more common in Alaska than single-stock terminal fisheries. Alaska has always recognized that mixed-stock marine fisheries have as much right to harvest salmon as fisheries opened in streams where salmon originate. Salmon are common property that belong to everyone, and there is no priority allocation for stakeholders closer to the stream of origin.
- **Proposal 282 Has a Cost-Benefit Ratio on the Order of 15 to 1.** In addition to examining the causes of recent low returns to Chignik, ICF analyzed the costs and benefits of Proposal 282. ICF used a retrospective analysis that looked at the costs to Area M fisheries and the benefits to Black Lake escapement if Proposal 282 had been in effect over the past ten years. According to ICF’s analysis, the cost-benefit ratio of the proposed restrictions on the Dolgoi Island Area and Shumagin Islands District fisheries is on the order of 15 to 1. That is, the proposed restrictions would reduce harvests in the Dolgoi Island Area and Shumagin Islands District fisheries by **15 times** the increased escapement in Chignik. This cost-benefit ratio would be even higher in years such as 2021, when there is a large Bristol Bay run migrating through the Shumagin Islands District. Because there is no conservation concern justifying

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<sup>14</sup> Available at [Mission Statement | Chignik Regional Aquaculture Association](#) (last visited March 8, 2022).

<sup>15</sup> According to WASSIP data, the Western and Perryville District fisheries harvested sockeye that originated outside of Chignik, with Bristol Bay, North Peninsula, South Peninsula, and East of WASSIP origin sockeye making contributions to the harvests in those Districts. See WASSIP, SP-22 at 41-43 (Tables 15-17).

<sup>16</sup> ADF&G Press Release (Jan. 13, 2022), available at [https://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2022\\_01\\_13](https://www.adfg.alaska.gov/index.cfm?adfg=pressreleases.pr&release=2022_01_13) (last visited March 7, 2022).

the proposed restrictions, the Board should not adopt restrictions that would impose such a heavily lopsided cost on Area M harvests in an out-of-cycle meeting in which allocation issues cannot be fully explored.

- **The Board Should Defer Consideration of Proposal 282 until the 2022-2023 Meeting Cycle When Other Responses to Low Returns of the Black Lake Run Can Be Considered.** Area M Seiners Association contracted with Steve Martell to examine the productivity of the Chignik sockeye runs. According to Dr. Martell's paper, an alternative harvest policy based on a fixed harvest rate would have a much higher utility during periods of low abundance, where fisheries would not be subjected to an absolute closure, but could operate within restrictions or limits (e.g., time-area closures) that would prevent exploitation rates from exceeding harvest rate objectives. This is an issue that can be explored in the 2022-2023 meeting cycle, at a meeting addressing the Chignik (as well as the Area M) fisheries. It cannot be explored in an out-of-cycle meeting addressing only Area M. The Board should resist the temptation to "do something" when there is no conservation concern, the Department retains its EO authority in the event of a conservation concern, there is no reason to believe the proposed action will have any detectable benefit in Chignik, the action would impose heavily lopsided costs on Area M, and other more promising actions cannot be considered until an in-cycle meeting.







## Appendix A

### **Proposal 282 Is an *Allocative* Proposal Not a *Conservation* Proposal. The Board Should Not Attempt to Re-Write Area M Management Plans in an Out-of-Cycle Meeting for Allocative Purposes.**

In its comments on Proposal 282, the Department states that it is neutral “on this allocative proposal.”<sup>17</sup> The Department’s characterization of Proposal 282 as an allocative proposal, not a conservation proposal, is correct. The Board should not attempt to re-write the Area M Management Plans in an out-of-cycle meeting based on allocative proposal.

The Board’s policy for management of sustainable salmon fisheries defines a “conservation concern” as a “concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a stock above a sustained escapement threshold (SET).” 5 AAC 39.222(f)(6). “[C]hronic inability” is “the continuing or anticipated inability to meet escapement thresholds over a four to five year period, which is approximately the generation time of most salmon species.” 5 AAC 39.222(f)(5).

A “sustained escapement threshold” or “SET” is “a threshold level of escapement, below which the ability of the salmon stock to sustain itself is jeopardized” and “can be estimated based on lower ranges of historical escapement levels, for which the salmon stock has consistently demonstrated the ability to sustain itself.” 5 AAC 39.222(f)(39). “[T]he SET is *lower* than the lower bound of the [biological escapement goal (BEG)] and *lower* than the lower bound of the [sustainable escapement goal (SEG)].” *Id.* (emphasis added).

Although the Department has not set a sustainable escapement threshold for the Black Lake run, the brood table for the run shows that, **historically, the run has been able to sustain itself when escapements were well below 350,000 fish.** The following table shows brood years in which, according to the Department’s data, parent escapements were less than 350,000 fish and the total return for those brood years. Between 1922 and 2017, there were 33 years with escapements less than 350,000 fish, and 15 years with escapements less than 179,000 fish. In 31 of these years the total return exceeded the parent year escapement; that is, **it has consistently demonstrated the ability to sustain itself at these escapement levels.**

Black Lake: Total Returns for Brood Years with Parent Escapements < 350,000 <sup>18</sup>		
Brood Year	Parent Escapement	Total Return
1922	86,421	963,814
1923	4,642	380,359

<sup>17</sup> RC 2, Alaska Department of Fish and Game, Staff Comments on Commercial, Personal Use, Sport, and Subsistence Regulatory Proposals, Committee of the Whole—Groups 1-3, for the Statewide All Shellfish (Except Prince William Sound, Southeast, and Yakutat) and Prince William Sound Shrimp Only Alaska Board of Fisheries Meeting, Anchorage, Alaska, March 26—April 2, 2022 at page 123 (Regional Information Report No. 5J22-01).

<sup>18</sup> K. Schaberg et al., Review of Salmon Escapement Goals in the Chignik Management Area, 2018, at pages 30-32 (Appendix B3) (ADF&G, Fishery Manuscript Series No. 19-02, Feb. 2019).





1926	289,099	530,194
1930	92,955	377,485
1931	96,201	1,128,231
1933	223,913	621,400
1935	194,636	419,709
1937	205,613	809,550
1938	175,972	1,025,570
1940	176,307	505,379
1944	291,844	334,093
1945	217,882	245,534
1949	213,269	308,534
1950	125,126	625,689
1951	125,126	625,689
1952	34,155	230,820
1953	168,375	357,607
1954	184,953	142,421
1955	256,757	554,495
1956	289,096	208,168
1957	192,479	350,512
1958	120,862	242,370
1959	112,226	340,946
1960	251,567	774,756
1961	140,714	571,645
1962	167,602	693,473
1963	332,536	698,703
1964	137,073	755,726
1965	307,192	1,948,144
1967	328,000	240,667
1968	342,343	1,210,286
1972	326,320	912,950
1975	326,563	361,227

Given this data, despite low returns in recent years, the Black Lake run has not demonstrated a “chronic inability, despite the use of specific management measures, to maintain escapements ... above a sustained escapement threshold.” Although the Department previously reported that the run had not met its *biological escapement goal* (BEG) goal for the past four years, updated data show that the run met its BEG in 2012, 2013, 2015, 2016, 2017, **and 2019** and is projected to do so again in 2022. And, although the run did not meet the lower end of the BEG in 2014, 2018, 2020 and 2021, in each of those years the escapements were well above historic levels from which the run has consistently demonstrated the ability to sustain itself. Accordingly, there is no evidence that the run has been, or is anticipated to be, below its *sustainable escapement threshold* for a period of four to five years.



The following table provides the Department's most recent estimates of escapements for the Black Lake run since 2012 (*i.e.* for the past ten years) and the projected escapement for 2022, and indicates whether the escapement met (or is projected to meet) the Department's BEG of 350,000 to 450,000 fish and whether the escapement was (or is projected to be) above 179,000. As noted, since 1922, escapements were below 350,000 in 33 years and below 179,000 in 15 years, and yet the run consistently has been able to sustain itself.

Black Lake Escapement Estimates <sup>19</sup>			
Year	Escapement	Met BEG?	More Than 179,000?
2012	356,513	Yes	Yes
2013	401,052	Yes	Yes
2014	342,404	No	Yes
2015	426,817	Yes	Yes
2016	410,922	Yes	Yes
2017	428,350	Yes	Yes
2018	182,991	No	Yes
2019	379,444	Yes	Yes
2020	179,200	No	Yes
2021	296,033	No	Yes
2022 (Projected)	400,000	Yes	Yes

In sum, the available data supports the Department's view that Proposal 282 is an allocation proposal, not a conservation proposal. The Board should not attempt to re-write the Area M management plans in an out-of-cycle meeting to address allocation concerns.

Under 5 AAC 39.999(a)(1), the Board will, in its discretion, change its schedule for consideration of a proposed regulatory change in response to an agenda change request only for a fishery conservation purpose or reason, to correct an error in a regulation, or to correct an effect on a fishery that was unforeseen when a regulation was adopted. ***The Board will not accept an ACR that is predominantly allocative in nature in the absence of new information found by the Board to be compelling.*** 5 AAC 39.999(a)(2). These limitations on ACRs reflect "the importance of public participation in developing management regulations" and the Board's recognition that "public reliance on the predictability of the normal board process is a critical element in regulatory changes." 5 AAC 96.625(e). Because new information now demonstrates that Proposal 282 is an allocation—not a conservation—proposal, the Board should decline to make changes to the Area M management plans based on that proposal in an out-of-cycle meeting.

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<sup>19</sup> The Department's most recent escapement estimates were provided to Mike Tillotson of ICF by K. Schaberg. The Department's projected escapement for 2022 is in Preliminary 2022 Westward Region Salmon Forecasts, ADF&G Advisory Announcement for Immediate Release: 12/14/2021, Table 2.

**D. Lloyd, Relative Effects of Mixed Stock Fisheries on Specific Stocks of Concern: A Simplified Model and Brief Case Study (Reprinted from the Alaska Fishery Research Bulletin, Vol. 3 No.1 Summer 1996)**

## **Appendix B**





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**Relative Effects of Mixed Stock Fisheries  
on Specific Stocks of Concern:  
A Simplified Model and Brief Case Study**

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**Denby S. Lloyd**

Reprinted from the  
Alaska Fishery Research Bulletin  
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## Relative Effects of Mixed Stock Fisheries on Specific Stocks of Concern: A Simplified Model and Brief Case Study

Denby S. Lloyd

**ABSTRACT:** An algebraic model is presented that allows comparison of changes in total catch, stock-specific catch, and stock-specific harvest rate for various fisheries harvesting the same stock of concern under conditions of change in the stock's abundance. The model operates without detailed estimates of each fishery's complete stock composition and without ongoing assessment of each component stock's biomass or population size. Rather, observations or assumptions of the proportional contribution ( $p_i$ ) of the stock of concern to each fishery's total catch, combined with presumptions of change in that stock's abundance ( $\theta_i$ ), are sufficient to illustrate proportional changes in catch and harvest rate under management prescriptions for constant harvest rate and for constant total catch. Results indicate that mixed stock fisheries, especially those with low  $p_i$  from a particular stock, are only slightly affected by and exert very small influence upon changes in abundance of that stock, even if total harvests remain constant. In contrast, single stock fisheries with high  $p_i$  are more directly affected by and exert more substantial influence upon changes in the stock's abundance. Because the presence of other stocks in a mixed stock fishery dilutes its relationship to any stock in particular, such a fishery may not need to be managed nearly so precisely as another fishery for which a common stock supports the bulk of the harvest.

### INTRODUCTION

The harvest of specific stocks of fish in mixed stock fisheries often generates questions of both biological and social concern. This is especially true when 1 or more of the stocks taken in an otherwise robust fishery is in decline. Conflicts exacerbate when the stock has other potential users, disputes focusing on appropriate sharing of management restrictions to help reverse the stock's decline. The attendant technical debate generally centers around the accuracy and precision of estimates of the stock's contribution to the fisheries and the effect of the harvests on the stock in question. Social debate can often range much further.

Obtaining accurate information on relative stock contribution to most mixed stock fisheries and evaluating a fishery's impacts on the component stocks are not easy tasks. At a minimum the origin of contributing stocks taken (e.g., determined by tagging experiments, scale-pattern analysis, or genetic stock identification) and their respective catches must be known. To evaluate the impact of the fishery on each stock, however, requires even more—that is, detailed knowledge of each component stock's respective total annual biomass or population size. And if stock identifica-

tion is not available each year, then to estimate catches and impacts over time, some indication of each stock's ongoing relative vulnerability to the fishery is required.

Rarely is all this information available, largely because this type of comprehensive data gathering is very expensive. Facing these constraints, managers and research biologists often need to fashion and defend some enterprising assumptions about stock composition, relative vulnerability, and annual stock size in order to estimate harvest or harvest rate, or to set prescriptions for harvest controls on component stocks. In a regulatory context such tacit uncertainty can lead to public perception that technical guidance is lacking at a time when decisions must be made.

This paper presents an alternative model, not nearly so data-intensive, with which to anticipate the relative potential impacts of various fisheries on a stock facing population decline. Specifically, this algebraic model factors out the need for most of the data inputs normally associated with estimating stock composition and calculating stock-specific harvest rates. To illustrate use of this model, a case study is presented of 2 Pacific herring *Clupea pallasii* fisheries in Alaska that purportedly harvest fish from the same stock: the Dutch Harbor food/bait fishery and the Nelson Island

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sac roe fishery in relation to spawning biomass of the Nelson Island stock.

There have been a number of attempts to characterize the relation of a mixed stock fishery to its various component stocks (Ricker 1958; Paulik et al. 1967; Hilborn 1976, 1985), but these have focused primarily upon calculation of optimum or maximum exploitation rates and rely upon some detailed estimates of individual stock-recruitment parameters. As a practical matter, such data often are not available (Healey 1982). For many management questions, more simplified approaches may well be sufficient.

## METHODS

The model relies upon estimates or assumptions of (1) the proportion of the fishery's total catch ( $\rho_x$ ) composed of fish from the stock of particular interest,  $x$ , and (2) the change in population size ( $\theta_x$ ) exhibited by that stock between one period or year to the next. Model outputs describe (1) yearly percentage changes in total catch ( $\theta_c$ ) and in stock-specific catch ( $\theta_{c,x}$ ) if fishing intensity were to remain constant, and (2) yearly percentage changes in harvest rate ( $\theta_{\mu,x}$ ) on the stock and its catch ( $\theta_{c,x}^*$ ) if the fishery's total catch were to remain constant. In the face of a particular stock's anticipated, presumed, or observed decline, values for  $\theta_c$ ,  $\theta_{c,x}$ ,  $\theta_{\mu,x}$ , and  $\theta_{c,x}^*$  give readily understandable measures of the stock's importance to the mixed stock fishery, the potential impact of the fishery on that stock, and the relative impacts on affected fisheries. Such comparisons can be useful in evaluating management and regulatory decisions necessary to address stock declines, especially in the face of uncertain or frequently unavailable data. This process might also placate legitimate concerns over fairness among multiple users.

### Parameters and Definitions

The only inputs required are measurements or assumptions of  $\rho_x$  and  $\theta_x$ . Other parameters, such as total and stock-specific catches and total biomass or population size for the stock in question, can be input, but they are not necessary to derive rates of change in total catch, harvest rate, and stock-specific catch.

Let  $C_x$  be a fishery's catch of stock  $x$  and  $C_y$  be a fishery's catch of all other stocks combined, so that total catch is  $C = C_x + C_y$ . Let  $N_x$  be the abundance of stock  $x$ , so that harvest rate is  $\mu_x = C_x \cdot N_x^{-1}$ . The proportion of stock  $x$  in the total catch is  $\rho_x = C_x \cdot C^{-1}$ .

The catch of a single stock in a mixed stock fishery in year 1 is

$$C_{x,1} = C_1 \rho_{x,1}. \quad (1)$$

The harvest rate in year 1 is

$$\mu_{x,1} = \frac{C_{x,1}}{N_{x,1}}. \quad (2)$$

The proportional change in stock abundance between years 1 and 2 is

$$\theta_x = \frac{N_{x,2} - N_{x,1}}{N_{x,1}} \quad \text{or} \quad N_{x,2} = (\theta_x + 1) N_{x,1}, \quad (3)$$

where  $N_{x,2}$  is the stock size in year 2 and  $N_{x,1}$  is the stock size in year 1.

For simplicity and to focus attention, the model assumes that between years 1 and 2 stock  $x$  is the only stock to change biomass or population size. The model also assumes that other aspects of vulnerability (e.g., migratory pathways and timing, gear efficiency, etc.) for all stocks in the fishery remain constant.

### Constant Harvest Rate

If in year 2 the fishery's overall intensity were to remain the same as in year 1, then respective harvest rates on all stocks, including  $x$ , would remain the same,  $\mu_{x,1} = \mu_{x,2} = \mu_x$ . The catch of stock  $x$  would thus decline by the same factor as the stock's size declined. Using equation (3),

$$C_{x,2} = \mu_x N_{x,2} = C_{x,1} (\theta_x + 1). \quad (4)$$

Given that abundance, harvest rates, and thus catches from other stocks remain constant, the total fishery catch of all stocks would decline by the numerical amount that catch of stock  $x$  declined:

$$C_2 = C_1 - (C_{x,1} - C_{x,2}). \quad (5)$$

Model output, in terms of the rate of change in stock-specific catch and under conditions of constant harvest rate, is simply equivalent to the proportional change in stock size, as derived from equation (4):





$$\theta_{c,x} = \frac{C_{x,2} - C_{x,1}}{C_{x,1}} = \theta_x. \quad (6)$$

The rate of change in total catch under constant harvest rate is

$$\theta_c = \frac{C_2 - C_1}{C_1}. \quad (7)$$

This equation can be simplified using relationships in equations (5), (4), and (1), such that

$$\theta_c = \rho_{x,1} \theta_x. \quad (8)$$

This percentage change in total fishery catch ( $\theta_c$ ) under constant harvest rate or fishing intensity results from the change in 1 component stock's abundance and the fishery's consequent change in catch effected by that stock alone.

Whereas individual stock harvest rates remain constant, changes in total catch and stock- $x$  catch change the proportion of stock  $x$  in the total catch. Thus, in year 2

$$\rho_{x,2} = \frac{C_{x,2}}{C_2}. \quad (9)$$

### Constant Total Catch

If in year 2 the fishery were to increase in intensity to make up for the lower availability of fish from stock  $x$ , thus keeping total catch in year 2 the same as in year 1, then respective harvest rates on all stocks would increase. The increased harvest rate on stock  $x$  is of particular concern.

The increase in total fishery catch from  $C_2$  to make  $C_2^* = C_1$  would equal the number of stock- $x$  fish not caught under constant harvest rate (see equation (5)):

$$C_2^* - C_2 = C_{x,1} - C_{x,2} = C_1 - C_2. \quad (10)$$

However, the stock composition of this incremental increase in total catch would not be solely from stock  $x$ . In fact, the increment ( $C_2^* - C_2$  or  $C_1 - C_2$ ) would display the same stock composition as the rest of the catch in year 2. Consequently, the total number of fish taken from the stock of concern would be the original amount calculated under constant intensity plus the

product of  $\rho_{x,2}$  times the increment in total catch needed to make up for the shortfall, or

$$C_{x,2}^* = C_{x,2} + [(C_1 - C_2) \rho_{x,2}]. \quad (11)$$

The new harvest rate on stock  $x$  would then be

$$\mu_{x,2}^* = \frac{C_{x,2}^*}{N_{x,2}}. \quad (12)$$

Model output, in terms of change in harvest rate on stock  $x$  with total fishery catch remaining constant between years 1 and 2, is

$$\theta_{\mu,x}^* = \frac{\mu_{x,2}^* - \mu_{x,1}}{\mu_{x,1}}. \quad (13)$$

This output equation can be simplified to relate change in harvest rate directly to  $\rho_x$  and  $\theta_x$  by first defining  $\mu_{x,2}^*$  from equation (12), then using relationships outlined in equations (11), (9), (4), and (3):

$$\mu_{x,2}^* = \frac{C_{x,1} C_1}{N_{x,1} C_2}. \quad (14)$$

Therefore,  $\theta_{\mu,x}^*$  from equation (13) can be derived from equations (14) and (2):

$$\theta_{\mu,x}^* = \left( \frac{C_1}{C_2} \right) - 1. \quad (15)$$

Equation (15) can then be expressed in terms of  $\rho_{x,1}$  and  $\theta_x$  by substituting values from equations (5), (1), and (4):

$$\theta_{\mu,x}^* = \frac{-(\rho_{x,1} \theta_x)}{1 + (\rho_{x,1} \theta_x)}. \quad (16)$$

This percentage change in harvest rate under constant total catch results from decline in abundance of stock  $x$  and subsequent intensification of the fishery on the entire mixture of stocks to maintain the same year 1 total catch level in year 2.

Corresponding change in catch of stock  $x$  if total catch remained constant is



$$\theta_{c,x}^* = \frac{C_{x,2}^* - C_{x,1}}{C_{x,1}} \quad (17)$$

This can be simplified similarly to the derivation of equation (14).  $C_{x,2}^*$  from equation (11) can be rewritten as

$$C_{x,2}^* = \frac{[C_{x,1}(\theta_x + 1)C_1]}{C_{x,2}} \quad (18)$$

Therefore, using equation (16)

$$\theta_{c,x}^* = \frac{\theta_x - (\rho_{x,1}\theta_x)}{1 + (\rho_{x,1}\theta_x)} \quad (19)$$

The change in stock- $x$  catch under conditions of constant total catch, in the face of population decline, results from intensification of the fishery on the entire mixture of stocks modified directly by a reduced abundance of stock  $x$ .

## RESULTS

The model derives 4 equations based solely upon an estimate of the proportion of total catch contributed by a stock of concern and an estimate of percentage change in that stock's abundance.

Assuming constant fishing intensity, thus constant harvest rates, the rates of change in stock- $x$  catch and total fishery catch are modeled by

$$\theta_{c,x} = \theta_x \text{ and } \theta_c = \rho_{x,1}\theta_x$$

Under a different management prescription to keep total fishery catch the same from year 1 to year 2 (denoted with symbol \*), proportional changes in stock- $x$  harvest rate and catch are modeled as

$$\theta_{\mu,x}^* = \frac{-(\rho_{x,1}\theta_x)}{1 + (\rho_{x,1}\theta_x)} \text{ and } \theta_{c,x}^* = \frac{\theta_x - (\rho_{x,1}\theta_x)}{1 + (\rho_{x,1}\theta_x)}$$

Although these equations are valid for both increases and decreases in stock size, results here are described primarily with regard to stock decline. Figures 1 and 2 depict the relationships of  $\theta_c$  and  $\theta_{\mu,x}^*$  to proportion

of catch ( $\rho_x$ ) at various levels of decline in stock  $x$  ( $\theta_x$ ).

Results are fairly intuitive for fisheries in which stock  $x$  composes the entire catch ( $\rho_x = 1.0$ ). When fishing intensity is constant from year to year (Figure 1), total catch will decline by the same proportion as the stock size reduction ( $\theta_c = \theta_x$ ). Changes in harvest rate resulting from keeping total catch constant (Figure 2) are also straightforward. If the stock declines by half, then the harvest rate on that stock would double ( $\theta_x = -0.50$ ;  $\theta_{\mu,x}^* = 1.0$ ). If the stock were to decline by only 25%, then the resulting harvest rate would have to increase by 33% ( $\theta_x = -0.25$ ;  $\theta_{\mu,x}^* = 0.33$ ) in order to maintain the same total catch.

Not so intuitive are the effects on total catch and harvest rate when the stock does not compose all of the fishery catch ( $\rho_x \neq 1.0$ ). Simply because a component stock declines by a certain proportion does not mean that impacts on or effects of a mixed stock fishery and a single stock fishery are the same. For example, if a prescribed management objective were to prevent any increase in harvest rates (i.e., maintain constant fishing intensity; Figure 1) of various fisheries on a stock that declined 50% ( $\theta_x = -0.50$ ), reductions in total catch in a fishery for which  $\rho_x = 1.0$  would be by half ( $\theta_c = -0.50$ ). However, total catch for a fishery with  $\rho_x = 0.1$  would only be reduced by 5% ( $\theta_c = -0.05$ ). This latter result occurs because a 50% decline in stock  $x$  affects only the original 10% that stock previously contributed to the fishery; abundance of other contributing stocks remains unchanged.

Similarly, that same mixed stock fishery with low  $\rho_x$  would not exert much additional pressure on the declining stock, even if fishing intensity increased to keep total fishery catch constant (Figure 2). Increase in harvest rate for a fishery with  $\rho_x = 1.0$ , in the face of  $\theta_x = -0.50$ , would be 100% ( $\theta_{\mu,x}^* = 1.0$ ), whereas  $\theta_{\mu,x}^*$  for a mixed stock fishery with  $\rho_x = 0.1$  in the face of the same stock decline would only be about 5% ( $\theta_{\mu,x}^* = 0.053$ ). In other words, the harvest rate of the single stock fishery would double, whereas the harvest rate of the mixed stock fishery would increase only a few per-cent. The latter result is derived from the fact that any incremental increase in harvest intensity, required to keep total catch constant and make up for the shortfall in availability of the declining stock, would be exerted against the entire mixture of stocks present, not just on the specific stock of concern.

Percentage change in stock-specific catch under conditions of constant harvest rate are simply equivalent to changes in population size ( $\theta_{c,x} = \theta_x$ ) and are not dependent upon the contribution of the stock to total fishery catch. Under conditions of constant total



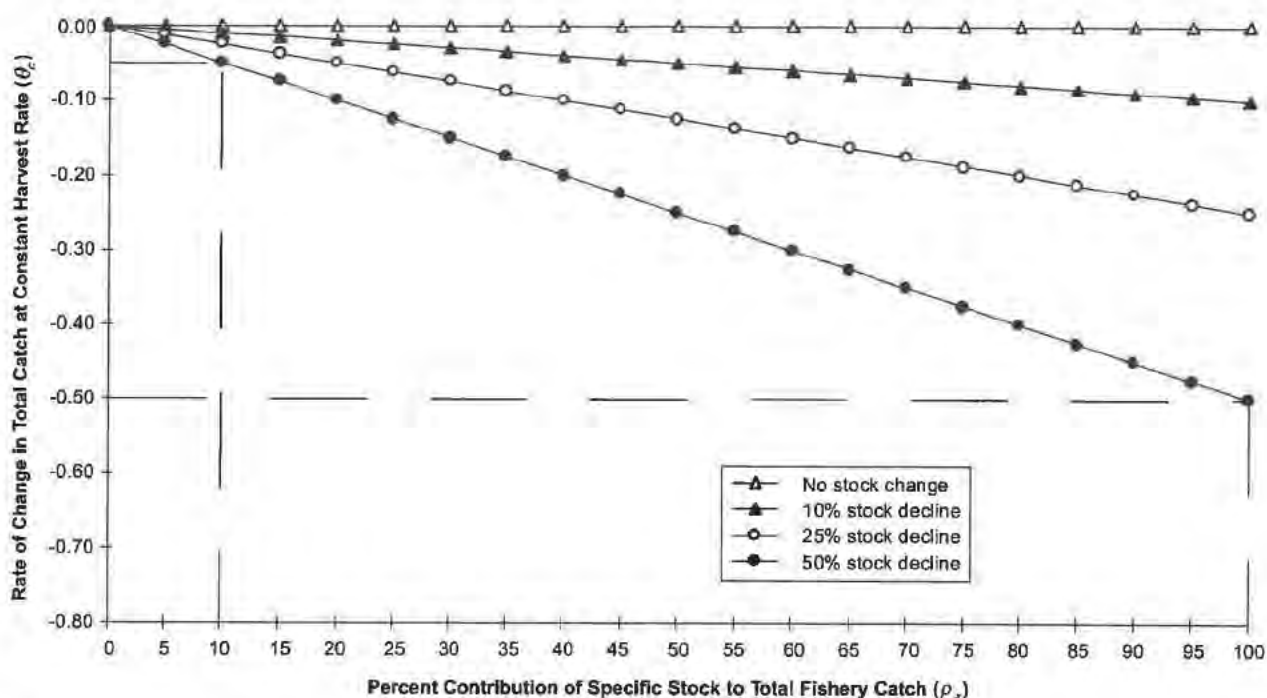


Figure 1. Change in total catch needed to keep harvest rate on a declining stock constant, as related to the stock's previous contribution to the fishery. Dashed-line examples shown are for  $\rho_x$  of 0.1 and 1.0, with  $\theta_x = -0.50$ .

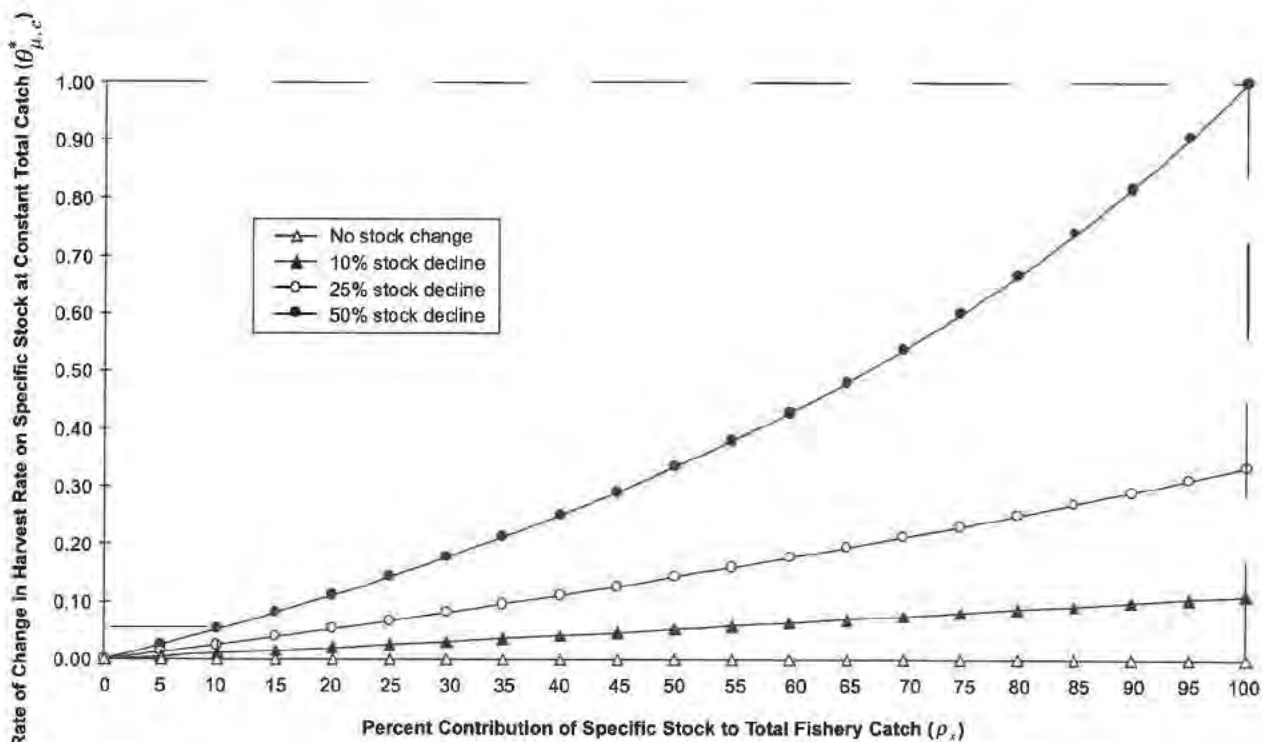


Figure 2. Change in harvest rate on a declining stock, given total fishery catch remains constant, as related to the stock's previous contribution to the fishery. Dashed-line examples shown are for  $\rho_x$  of 0.1 and 1.0, with  $\theta_x = -0.50$ .



catch, however, changes in stock-specific catch are directly influenced by  $\rho_x$ . Figure 3 depicts  $\theta_{c,x}^*$  showing much greater accommodation to reduced population size by fisheries with low  $\rho_x$ ; there is almost no accommodation by those fisheries in which stock  $x$  is the major contributor.

Although attempting to maintain constant harvest rates is a common fishery management objective, it is actually total catch that is adjusted to accomplish this objective. Figure 4 depicts the difference in changes to stock-specific catch under imaginary conditions of reducing total catch to keep harvest rate constant and under more static conditions of maintaining a constant total catch for various fisheries of differing  $\rho_x$ . This figure illustrates a large difference in effect on stock  $x$  for those fisheries with high  $\rho_x$ , indicating that some management control of total catch may be necessary. But for mixed stock fisheries in which the stock contributes only a small proportion of the total catch, there is little difference in effect between allowing the fishery to continue previous total catch levels and attempting to fine-tune that fishery's total catch so that an individual harvest rate and stock-specific catch exactly match changes in the contributing stock size.

## CASE STUDY

In Alaska annual catch quotas for single stock herring fisheries are generally established under a constant harvest rate strategy (Funk and Harris 1992) based upon annual estimates of spawning biomass. In western Alaska about 6 apparently discrete spawning stocks support distinct sac roe fisheries, from the Alaska Peninsula and Togiak through the Yukon-Kuskokwim delta and further north to Norton Sound. A herring food/bait fishery near Dutch Harbor, in the Aleutian Islands, presumably takes a mixture of the western Alaska spawning stocks and is managed under a total catch quota calculated each year based upon preseason estimates of the large Togiak spawning biomass in Bristol Bay.

In the late 1980s and early 1990s, several of the western Alaska stocks were in decline, notably those spawning at Nelson Island. Funk et al. (1991) describe the limited information available on stock composition of the Dutch Harbor food/bait fishery. Based upon presumed migratory routes, timing of fisheries, some scale-pattern analyses, and respective biomasses of western Alaska stocks, they estimated that the Nelson Island stock may contribute approximately 2–3% of

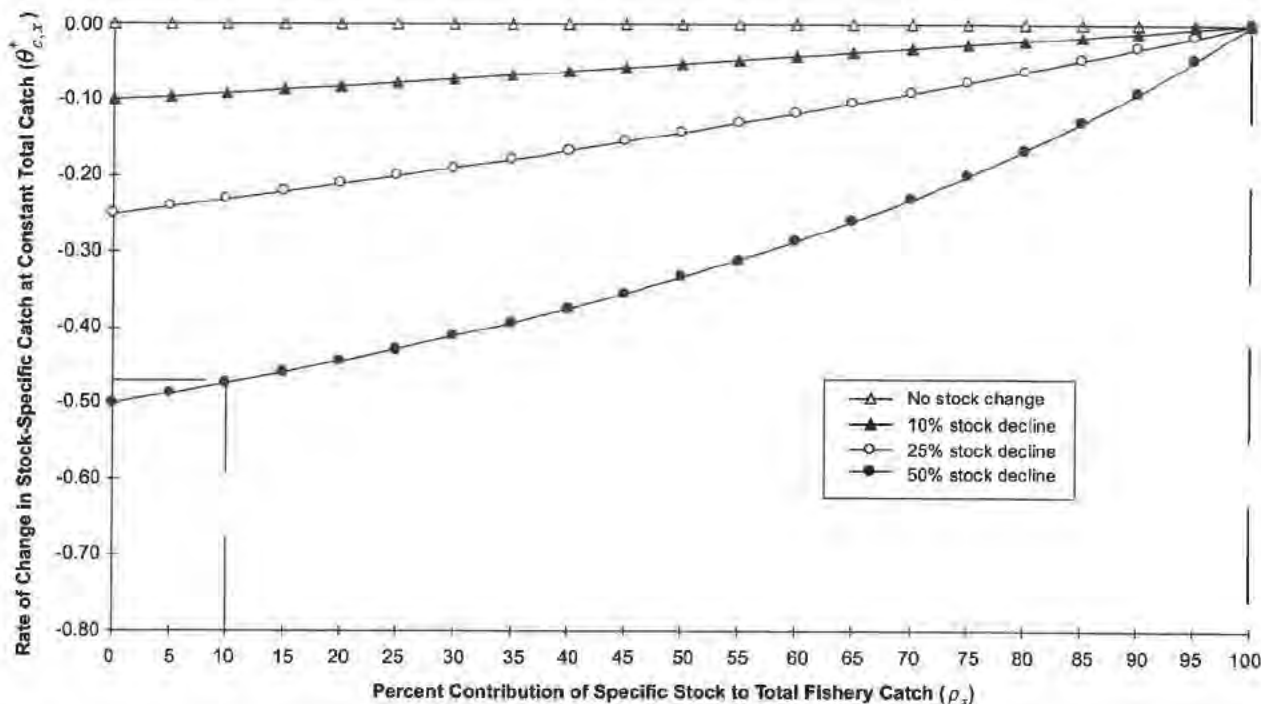


Figure 3. Change in stock-specific catch on a declining stock, given total fishery catch remains constant, as related to the stock's previous contribution to the fishery. Dashed-line examples shown are for  $\rho_x$  of 0.1 and 1.0, with  $\theta_{c,x}^* = -0.50$ .

the Dutch Harbor harvest. Funk (1991) and Funk and Harris (1992) report spawning biomass estimates for the Nelson Island stock of 2,705 tons in 1990 and 2,385 tons in 1991, a Dutch Harbor harvest of 820 tons in 1990, and a Nelson Island allowable harvest of 205 tons in 1990 (actually, no commercial harvests were taken at Nelson Island due to lack of a market). Although the model requires only values for  $\rho_x$  and  $\theta_x$ , all of these estimates are used (Table 1) to more clearly illustrate hypothetical changes in this case study.

Though the stock decline was not very substantial (11.83%, for a  $\theta_x$  rounded to -0.12), the differences in  $\rho_x$  for the Dutch Harbor and Nelson Island fisheries (0.03 and 1.0, respectively) result in some definite differences in their potential responses in catch and harvest rate. If, under assumptions of this model, the Dutch Harbor fishery were to have maintained the same harvest rate in 1991 as in 1990, then its total catch (820 tons) would need to have been reduced by only 3 tons, for a  $\theta_c$  basically indistinguishable from zero (i.e., no change). For the Nelson Island fishery to have maintained a constant harvest rate, its total catch (205 tons) would need to have been reduced by 12% (24 tons), for a  $\theta_c = -0.12$ , which is readily distinguishable from zero.

If both fisheries were to have been allowed to maintain their total catch for 1991 the same as for 1990, then harvest rate of the Dutch Harbor fishery on the Nelson Island stock would not have noticeably increased, by about 0.3%, for a  $\theta_{\mu,x}^*$  indistinguishable from zero, whereas the Nelson Island harvest rate would have increased by about 13%, for a  $\theta_{\mu,x}^*$  of 0.13.

Regarding changes in stock-specific catch, letting the Dutch Harbor fishery maintain a constant catch level between years ( $\theta_{c,x}^* = -0.12$ ) was pragmatically equivalent to attempting to adjust total catch to keep harvest rate absolutely constant ( $\theta_{c,x} = -0.12$ ). In either case the Dutch Harbor catch of Nelson Island herring would similarly adjust to reduced abundance of the stock.

However, for the Nelson Island fishery, under constant total catch,  $\theta_{c,x}^*$  is zero whereas attempting to achieve a consistent harvest rate would require a substantial correction ( $\theta_{c,x} = -0.12$ ). Thus, to achieve the same objective, in this case constant harvest rate, the total Nelson Island catch must be reduced about 12%, but there would be no practical reason to alter the total mixed stock Dutch Harbor fishery catch.

For Dutch Harbor at low  $\rho_x$  there is little difference between strategies of constant harvest rate and

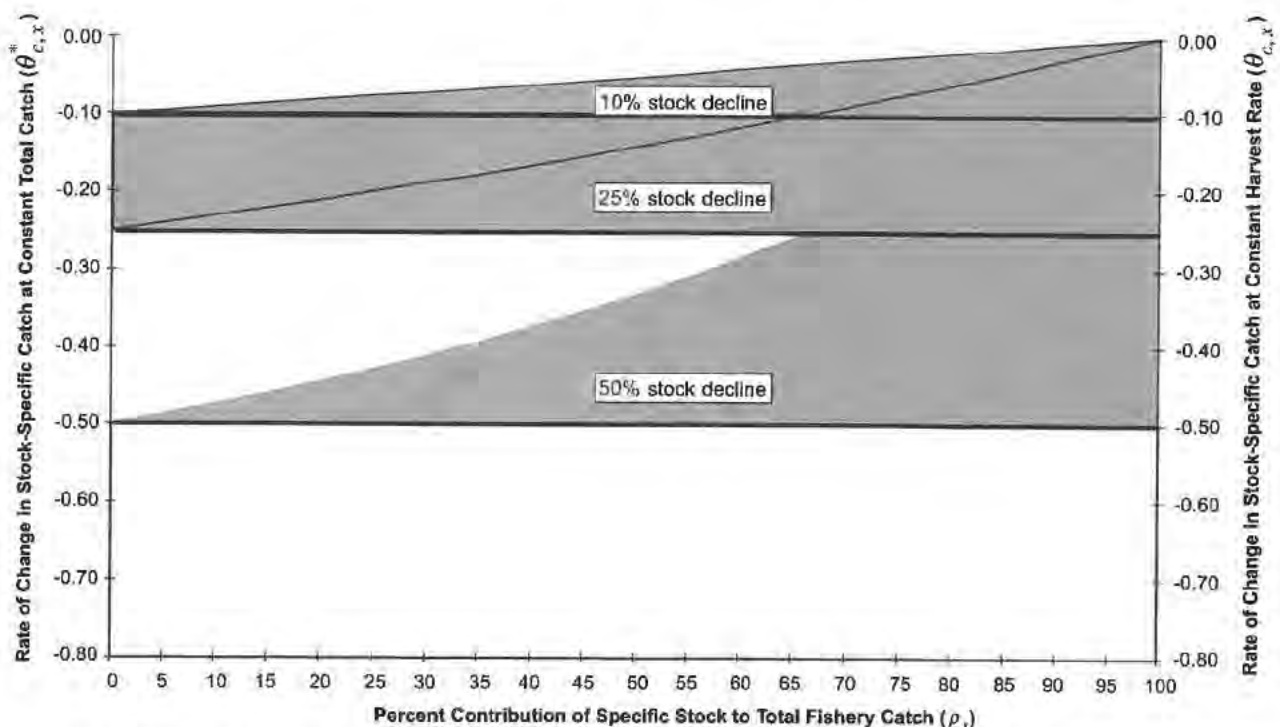


Figure 4. Difference between changes in stock-specific catch (filled areas), given total fishery catch remains constant (upper sweeping boundaries), compared to constant harvest rate (dark, lower horizontal lines), at various rates of stock decline.



Table 1. Model worksheet and illustration for Dutch Harbor food/bait fishery and Nelson Island sac roe fishery on the Nelson Island herring stock, 1990 and 1991.

	Model Parameters	Dutch Harbor Fishery Tons of Fish	Rates and Percents	Nelson Island Fishery Tons of Fish	Rates and Percents
Inputs					
Initial conditions:					
1990 stock size (tons)		2,705		2,705	
1990 total fishery herring catch		820		205	
Initial proportion of fishery catch composed of stock in question	$p_x$		0.03		1.00
Resulting tons of fish from stock harvested in fishery		25		205	
Resulting fishery harvest rate on stock of concern			0.91%		7.58%
Proportional change in stock size, from 1990 to 1991	$\theta_x$		-0.12		-0.12
Illustration					
For constant fishing intensity (harvest rate) in 1991:					
Stock size in 1991		2,385		2,385	
Tons of fish to be taken from stock in 1991, at same fishing intensity		22		181	
Decline in total fishery catch		-3		-24	
Resulting total fishery catch		817		181	
1991 proportion of stock in the fishery catch			2.65%		100.00%
Proportional change in total catch			-0.35%		-11.83%
Proportional change in stock-specific catch			-11.83%		-11.83%
On to constant harvest level (total catch) in 1991:					
Increase in harvest to make up deficit		3		24	
Resulting total fishery catch		820		205	
1991 proportion of stock in the fishery catch			2.65%		100.00%
Additional fishery harvest of stock of concern		0		24	
Total 1991 harvest of stock of concern		22		205	
Resulting harvest rate on stock of concern			0.91%		8.60%
Proportional change in harvest rate			0.36%		13.42%
Proportional change in stock-specific catch			-11.52%		0.00%
Output (calculated solely from $p_x$ and $\theta_x$ )					
Constant harvest rate between 1990 and 1991:					
Proportional change in total catch	$\theta_c$		0.00		-0.12
Proportional change in stock-specific catch	$\theta_{c,x}$		-0.12		-0.12
Constant total catch between 1990 and 1991:					
Proportional change in harvest rate	$\theta_{h,x}$		0.00		0.13
Proportional change in stock-specific catch	$\theta_{c,x}^*$		-0.12		0.00

Table 2. Effect of raising  $\rho_x$  for the Dutch Harbor food/bait fishery and intensifying  $\theta_x$  for the Nelson Island herring stock.

	Parameter	Dutch Harbor Fishery	Nelson Island Fishery
<b>Inputs</b>			
Initial proportion of fishery catch composed of stock $x$	$\rho_x$	0.06	1.00
Proportional change in stock size	$\theta_x$	-0.50	-0.50
<b>Output</b>			
<i>Given constant harvest rate:</i>			
Proportional change in total catch	$\theta_c$	-0.03	-0.50
Proportional change in stock-specific catch, given constant harvest rate	$\theta_{c,x}$	-0.50	-0.50
<i>Given constant total catch:</i>			
Proportional change in harvest rate	$\theta_{\mu,x}^*$	0.03	1.00
Proportional change in stock-specific catch	$\theta_{c,x}^*$	-0.48	0.00

constant catch, but for Nelson Island at high  $\rho_x$  there is a substantial difference. The proportion of the Dutch Harbor fishery composed of Nelson Island spawning stock is so low that a moderate stock decline has little or no bearing on the mixed stock fishery (or the fishery on the stock), yet impacts to and response required of the local Nelson Island fishery are much more substantial.

The model can be used to examine more extreme situations as well. The Nelson Island stock can potentially fluctuate widely between years (Hamner and Kerkvliet 1994), more than the 12% decline noted between 1990 and 1991. Moreover, the contribution of Nelson Island herring to the Dutch Harbor catch might conceivably be higher than estimated by Funk et al. (1991). By changing population decline to  $\theta_x = -0.50$  and doubling the proportional contribution of Nelson Island herring to the Dutch Harbor fishery ( $\rho_x = 0.06$ ), then model outputs can be recalculated to compare more extreme effects of the Dutch Harbor fishery on the Nelson Island herring stock (Table 2). Even assuming more impact to this stock by mixed stock catches at Dutch Harbor, it is the local Nelson Island fishery that must be adjusted in response to the stock's decline; adjusting catch in the Dutch Harbor fishery would still be inconsequential (Figure 5).

Although managers may be more immediately concerned with declining stocks, this model can also be used to examine relative benefits to various fisheries gained through increases in abundance. Using inputs from the example above, but rather than declining in half, assume the Nelson Island stock doubled ( $\theta_x =$

1.0) as it did between 1991 and 1992 (Hamner and Kerkvliet 1994), then  $\theta_c$  for Dutch Harbor would be 0.06 compared to a  $\theta_c$  for Nelson Island of 1.00;  $\theta_{\mu,x}^*$  for Dutch Harbor would be -0.06; and  $\theta_{c,x}^*$  for Nelson Island would be -0.50. Figure 5 illustrates these conditions as well; little difference in stock-specific catch between strategies of constant harvest rate and constant catch for Dutch Harbor but substantial gains for the Nelson Island fishery under constant harvest rate rather than constant catch. Consequently, doubling of the Nelson Island stock biomass would hardly be felt in the Dutch Harbor fishery, while total catch at Nelson Island could double without increasing its harvest rate. Thus the benefits and costs of single stock fluctuations apply much more directly to single than to mixed stock fisheries.

Finally, although not derived entirely from the model's simplified equations, the model can illustrate the effect of applying strict proportional reductions on total mixed stock catch in fisheries of low  $\rho_x$  in the face of a single stock decline. In the case of a 50% reduction in biomass ( $\theta_x = -0.50$ ), in year 2 there would be no discernible difference in harvest rate ( $\mu_{x,2} = 0.91\%$  to  $\mu_{x,2}^* = 0.92\%$ ) or stock-specific catch ( $C_{x,2} = 12.30$  tons to  $C_{x,2}^* = 12.49$  tons) for the Dutch Harbor fishery (at  $\rho_x = 0.03$ ) under either harvest strategy. Yet, loss to the fishery as a whole ( $C_2^* - C_2$ ) would be 1.5% of total catch (>12 tons) if total catch were reduced to keep harvest rate absolutely constant.

If the quota was reduced by half under a mistaken impression that a 50% reduction, rather than a 1.5% reduction, in total catch at Dutch Harbor must be im-

posed to match a 50% decline in the Nelson Island stock, then the costs would even further exceed the benefits. Applying consequent  $p_{x,2} = 1.52\%$  to the reduced quota (410 tons) would give a stock-specific catch savings of <6 tons of Nelson Island herring out of the reduced population size of 1,353 tons (i.e., a 0.4% "savings") at a cost of 410 tons (50%) of total catch to the Dutch Harbor fishery. In this case, almost 70 tons of catch at Dutch Harbor would be forfeited for each of the 6 tons of Nelson Island stock saved. Yet, these savings would be an insignificant contribution to the Nelson Island stock's total biomass.

## DISCUSSION

Ricker (1958), in an early evaluation of a mixed stock fishery and its several component stocks, noted:

*Most of the conclusions arrived at from the analyses above could, I believe, be reached*

*by "intuition" or common-sense reasoning, without actual computation... The value of these calculations and others similar is mainly to provide objective models which can be cited in justification of a particular regulation. What is common sense to one man may seem ridiculous to another. The calculation of benefits and losses under prescribed conditions is the only way to resolve such arguments.*

Sometimes regulatory questions must address comparison of 2 or more fisheries upon a shared stock of fish, rather than a single fishery upon 2 or more stocks. Just such a debate surrounded management of the Dutch Harbor and Nelson Island herring fisheries and occupied the Alaska Board of Fisheries from the mid 1980s through the early 1990s. In the face of decline in the Nelson Island stock, the board wished to share the management burden across both fisheries in some comparable manner but found little technical information available to assist them.

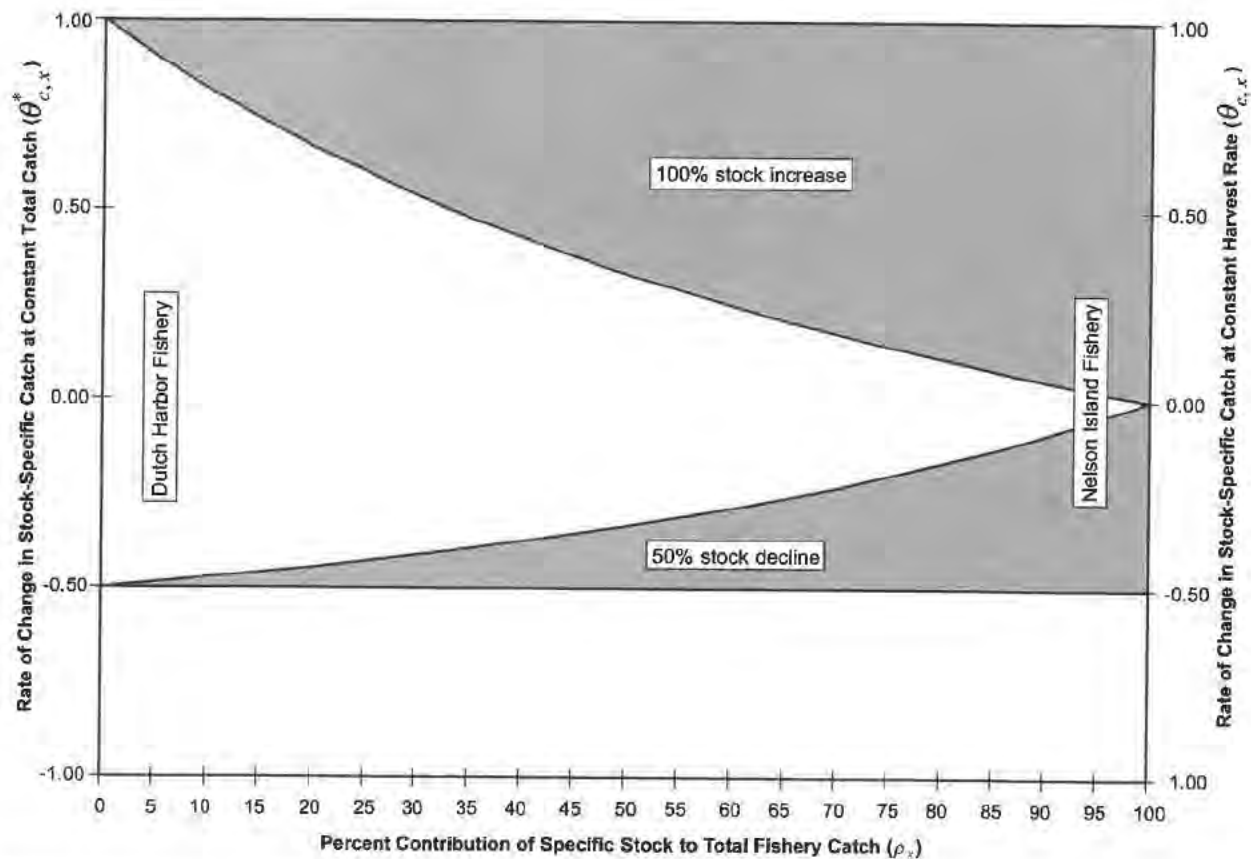


Figure 5. Comparison of potential changes in catch of Nelson Island herring in Dutch Harbor and Nelson Island fisheries, given total fishery catch remains constant compared to constant harvest rate;  $\theta_x = -0.5$  and  $+1.0$ .



This paper presents a simple method to compare the relative effects of different fisheries on a common stock of concern. Results indicate that a mixed stock fishery, for which a specific stock contributes only a small portion of the total harvest, may have little relative effect on the stock, even if it is in substantial decline and total harvest of the fishery remains unchanged. Catch reductions or changes in harvest rates need not be the same among fisheries sharing a stock of concern in order to effect similar responses by the fisheries or to exert similar influence upon the stock. For example, not all fishery catches would need to be cut in half to maintain a consistent harvest rate on a stock that declines by 50%. The algebraic model and brief case study developed here illustrate that, in the face of changes in abundance ( $\theta_x$ ), the proportional contribution ( $\rho_x$ ) of a stock to a fishery's harvest dramatically influences that fishery's total and stock-specific catch and the effects of that fishery (e.g., harvest rate) on the stock.

Various scenarios within the case study illustrate the robustness of the model. Initial assumptions need not be especially accurate, so long as there is a substantial difference in the  $\rho_x$  of fisheries being compared, which is usually the case between mixed stock fisheries and more stock-specific ones. Of course, this model presumes that only the single stock of concern fluctuates in abundance from year to year. While this is seldom strictly true in the real world, such an assumption can be valid as long as there is not substantial covariance in the abundance of contributing stocks. It would be possible to expand this model to allow for an increase or decrease in aggregate abundance of

stocks other than  $x$ . Generally, if such  $\theta_y$  were to be positive while stock  $x$  declined, then the differences between fisheries of low and high  $\rho_x$  would be even more pronounced than described here. Conversely, if  $\theta_x$  and  $\theta_y$  were both negative, then the differences between fisheries would be less distinct.

Many times the data needed to conduct a detailed examination of various fisheries' relationships to fluctuating stock abundance are simply not available, yet management concerns must still be addressed. This model illustrates a rather apparent, but sometimes overlooked, notion that the proportion of total catch contributed by a particular stock affects the responses of fisheries to the stock's decline.

Specifically, fisheries that rely heavily upon the stock of concern have a much more direct relationship to any fluctuations in the stock, whereas such influences and effects are diluted by the presence of other stocks in a mixed stock fishery. If the proportion ( $\rho_x$ ) is quite small, then the effects on stock  $x$  of a constant catch or a constant harvest rate policy would be nearly identical, but the difference between such policies on total catch of the mixed stock fishery could be substantial.

This model can be used for a number of fishery types, whether they are quota-based or exploitation rate-based, such as those for herring, groundfish, and shellfish. Extension of this model to escapement-based salmon fisheries is discussed separately (see Lloyd 1996 in this issue) because salmon fisheries are generally managed upon fixed annual escapements, with allowable catch and harvest rates both fluctuating greatly depending upon harvestable surpluses.

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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I live in Chignik Bay and everyone in our community is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. The mainstay of our economy is our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Arlene Kopsu*



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February 26, 2022

Dear Board of Fish,

my family loves to fish. We grew up doing it from generations before us. We come to Alaska to enjoy the nature and fishing and beauty it has to offer. Fishing should not be limited to the average household because commercial fisheries would only benefit and the average joe would lose. I love salmon, but if it meant boycotting eating salmon for the rest of my life if this gets passed, I will. Because nothing tastes better and more rewarding then a fish you caught yourself or from your family. Keep us human!

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.

Ashlie Johnson



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March 05, 2022

Dear Board of Fish,

As a relatively new resident to Soldotna, moving here in August 2020, it was easy to see how much salmon fishing means to this community and this state. It was just as easy to realize salmon fishing, particularly king fishing, is not what it used to be years ago. Hearing stories about the days past makes me wish I was born a few decades earlier to be able to partake in truly giant king salmon fishing. I cannot grasp the idea of allowing more by-catch for commercial fishing before king salmon escapement goals are met. If sportfishers are asked to modify their tactics and retention of kings each year because return numbers are not meeting the goal, why should commercial fishing be allowed to start pulling from the already small returns before kings even make it into the river?

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.

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.

Austin Brandes

Soldotna  
99669

Submitted By  
Ava Suzanne Metcalfe  
Submitted On  
3/11/2022 8:30:14 PM  
Affidavit on



PC033  
1 of 1

I really enjoy fresh Prince William Sound shrimp from my favorite fisherman and am an Alaskan that wouldn't have access to the best shrimp in the world shrimp without the commercial fishery. Please continue to allow it. Thank you.



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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I am from Chignik Bay and have fished with my Dad since I was a little kid. I have dreams of owning my own boat someday and fishing in Chignik like my Great-Grandpa, Grandpa, and Dad have done. I am working hard to achieve that dream but these past few seasons have made that very difficult. I'm also trying to make money to help pay for my college education. I'm not the only one trying to do all these things. Everyone in Chignik is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. Our economy is built on our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for the Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Axel A Kopun*



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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I am from Chignik Bay and have fished there for over 40 years. Everyone in our community is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. The mainstay of our economy is our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Axel S. Kopun*



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March 08, 2022

Dear Board of Fish,

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 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.

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.

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.

barbara bogart



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February 25, 2022

Dear Board of Fish,

I've been fishing since I was old enough to walk, My dad always made sure to take me even when his friends strongly objected. My husband's family has had property on the Kenai since the early 80's and built themselves a nice house recently where we stay all fishing season. Since my husband was a kid he has fished the Kenai, and every year we go we see the dwindling escapement numbers of both sockeye and chinook. Our family practices a subsistence lifestyle as best we can. Sourcing our food from nature and gardening is incredibly important to us. It's frightening to me to think that in just a few years my son will not be able to fish for kings, that the giant salmon will be wiped out by commercial fisheries, who waste this precious resource with far greater reach than ours. Please consider all of us small Alaskan families who feed our children with wild resources. Thank you.

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.

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.

Bayley Barton  
99502





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March 09, 2022

Dear Board of Fish,

My name is Ben Collier. I have lived in Alaska on the Kenai Peninsula for over 45 years. I am a retired Bering Sea commercial fisherman, having spent over 25 years as a deckhand/captain on all ocean waters in Alaska and beyond. After retiring in commercial arena, I have become a full time sport fishing guide on the Kenai Peninsula (over 15 seasons). I believe in sustainable commercial fishing and sustainable fishing practice all around. I feel that our management practices are using a reverse method, by this, I mean it is well known that the majority of King salmon premature mortality happens in the Bering sea and around Kodiak by the trawl fleet, and marine mammal predation. It is sad that these fisheries have been able to pay their way past regulations to limit King salmon mortality and by catch limits. If these limits were more strict, we would not be arguing about how to manage the meager amount of Kings returning to Peninsula and Alaskan rivers. The Marine Mammal Protection Act is out dated and does not encourage resource sustainability. Putting one user group in front of the other is not the answer.

1. Do the research
2. Identify where the majority of kings are being lost
3. Stem the loss

It seems simple, but it is very complex. Lowering the acceptable King salmon escapement # on the Kenai River to allow more commercial fishing is deplorable at a time when we are on the precipice of decimating the species. Also proposing this at a meeting when sports fishermen are under represented is disturbing. This decision will bring about more loss of confidence in the Fisheries Council.

ADF&G has used the Kenai river sonar as a weapon to encourage overfishing, by counting fish traveling upstream on the tides, then extrapolating the # to make it seem like there are many more fish than there really are. I have personally seen the counting of hundreds of thousands of pink salmon and labeling them sockeye. This is deplorable, these decisions undermine public confidence and put the agency we fund and count on in poor light.

While I have digressed into the weeds a bit, this is to illustrate the solution to resource recovery, is not as easy as limiting commercial or sport fishermen in the vicinity of the Kenai river. We have put restrictions on both user groups for over 2 King salmon life cycles with no acceptable recovery. Unfortunately some think that proposing to lower escapement #'s on the Kenai River will somehow help the fishery recover or sustain. This is the proposal of an uneducated person, I would recommend getting all persons up to speed on the complex issue at hand, best resource management practices.

I do not have the solution, that is what the board of fish is for, to use best information/science to make effective decisions to protect the resource. With a desperate proposal like 283, you are proving that there is no accountability and that loss of public confidence is justified.

As long as we manage with the "revenue over resource" type mentality, all fishermen and generations to come, will have to find a way to enjoy fishing for pink salmon, because soon that will be all that returns.



Protect all wild fish populations in Alaska and the revenue will follow.

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.

Ben Collier

Sterling  
99672



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March 12, 2022

Dear Board of Fish,

Thank you for taking the time to review comments from the public on these matters. Your time as Board members is precious, and the current stack of days due to COVID and unnecessary revisiting of actions taken in 2020 make your time and attention even more critical.

I would like to begin by stating my opposition to Proposal 283.

I believe re-opening the Late Run King Salmon Management plan is a short sighted response to a challenging - but not unexpected - situation. Reopening the plan will disenfranchise stakeholders and will exacerbate tensions in the small communities on the Kenai Peninsula. Further, de-linking the work of conservation among different user groups ignores over three decades of hard work by stakeholders and professional staff to find some sense of equity in king salmon fishery restrictions. I believe the course of action that would do that least harm to the fishery, and to the integrity of the Board of Fisheries public process, would be for the Board to withdraw support for considering Proposal 283, and dispose of this proposal by taking no action. Second to that, if the Board feels it must hear this issue out (just two years after passing it), then I hope you will respect the voices of hundreds of Alaskans and vote no to 283.

Finally, I'll note that this issue does not appear to have any biological need. Despite exceeding the sockeye goal in the Kenai for several years, the doom and gloom of "overescapement" has not come to pass. Please do not sacrifice the extremely limited number of Kenai River King Salmon for the even more limited benefits of a few more sockeye in commercial nets. I urge the board to maintain its commitment to conservation of the fishery.

I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Ben Mohr

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

My name is Ben Sweeney and I have been a Kenai Peninsula resident for 20 years, previously in Cooper Landing and currently in Sterling. I have fished the Kenai river top to bottom on average 50+ days a year in that time period for all species. What I haven't done since 2013 is fish for our beloved Kenai King. Why? Because every single fish matters in these repeatedly dismal returns and I took it upon myself from a moral standpoint almost a decade ago to not be the cause to lose another that could be avoided. This proposal is the definition of "moving the goalposts" to support and agenda of a small user group. Escapement not high enough? Just lower the escapement then. A ridiculous and detrimental proposition. I hereby state my strong opposition to this proposal. This and every fish and game population should be managed on scientific facts, not political wants.

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.

Ben Sweeney

STERLING  
99672



Chairwoman Carlson Van Dort, members of the Board,

My name is Benjamin Allan, Chignik AC Vice Chair, Chignik City council member and Fisherman;

I am in support of proposal 282.

I would like to thank the board for taking up action on proposal 282 out of cycle as area L is in a dire emergency with a need of corrective action outside our area for conservation. proposal 282 should have requested that the entire Southeastern district and South Central District Do you shut down until mid range escapement has been obtained in Chignik; It was thought that, that need was outside the ask of an out of cycle proposal. That being said this proposal will help to bring back more fish to help in conservation and I believe it is only a small fix on what needs to be a more holistic approach to repair terminal systems in Alaska.

Actions of the board, to area M That took effect starting in 2004 season, of removing the allocation that focused fishing on Bristol Bay stocks was removed, created a shift in effort to the east. This has resulted in the potential loss of the previous escapement as well as reduced yield and fishing time in Chignik, SEDM and has affected their own local stocks as well which have been masked buy the fish and game by reducing minimum escapement goals. You have the opportunity to help redirect fish back to the river system that your predecessors have allocated away from that system.

South Peninsula fishery needs to be internally re allocated to focus catching in the Western districts and on the plentiful stocks that are Strengthening every year; but this is something that will have to be taken care of during a regular cycle and that is not what this proposal is here to do. This proposal is helping the river system get some of his fish back so that it can make escapement and rebuild the Chignik run to the Extraordinary System it once was and restore opportunity to subsistence users and maybe one day a commercial fishery again.

Interception fisheries are parasitical by nature and there is nothing wrong with the catch of surplus to a reasonable degree, but as with any parasite if it is allowed to overwhelm the host both the host and parasite or inevitably destroyed. Due to the location of the Shumigan islands a large amount of mixed stocks go through it. Just because one of the mixed stocks in an area of interception is doing well, does not exclude need for protections that can be given to an area that is suffering. Fishing effort can be moved westward giving shareholders in the South



Peninsula fishery opportunity without destruction of eastbound stocks. If Bristol Bay runs began to collapse the entire South Peninsula cape fisheries would be shut down without question as it was in 1974; and by not taking action you are showing preferential treatment to not only an interception fishery but also between two terminal runs which should never be the case.

The ADF&G has reduced our areas fishing to its maximum restrictions and reduced fishing in a minor way in some known interception areas at times, making an inconsequential effect, but they do not feel comfortable reaching any further without Board directive. So we ask that you accept the proposal 282 giving them full backing of the state to make that decision, as they now feel that achieving escapement could be allocative and they feel that the best way to achieve the escapement is to lower the bar which effectively reduces yield in future years, which is not the right direction to go. ADF&G has explained that it has no other tools in its management toolbox to help rectify this situation and any other correction would be stepping out of management and into allocation. Chignik had some amazing fishing season in the past and because of this portions of our stocks became allocated to other groups that were not doing as well. I would think that the board could at least allocate enough fish to get escapement back to the preferred MSY mid range as the state constitution directs.

Thank you for your consideration and I appreciate the difficulty and responsibility of the decision you must make.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin Allen".

Benjamin Allen



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February 15, 2022

Dear Board of Fish,

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.

Benjamin Birch

Anchorage  
99515-3646



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February 15, 2022

Dear Board of Fish,

I am a 67 year resident of Alaska and have been Sportfishing since I was 8 years old and also commercial fished for 15 years. I am very concerned about the health of the King salmon runs statewide, and particularly in the Kenai River. I was very pleased with the actions taken by the Board in 2020 to help rebuild the Kenai River run, but now have great concerns that those actions may be diluted by Proposal 283 that will be considered at your March meeting.

Passing Proposal 283 would prioritize 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 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.

Bill Eckhardt

Sterling  
99672





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February 20, 2022

Dear Board of Fish,

I live in Minnesota and have seen first hand the damage caused by over fishing in some of our lakes. I would not wish this on any other body of water. I enjoy sport fishing and hope to have to opportunity to fish for kings salmon in years to come on my visits to the Kenai.

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.

Bill Walls

Lakeville  
55024



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February 19, 2022

Dear Board of Fish,

I've been fishing the Kenai river since 1980 I love this river....I fish the Kenai May thru October, I do occasionally fish the salt out of Deep Creek and Homer once or twice a year. I live just off the river in the Riverwood subd. Please save this awesome fishery so my five children and grandkids can enjoy for years to come  
Thxs Bob

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.

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.

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.

Bob Peters

Kenai  
99611



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February 15, 2022

Dear Board of Fish,

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.

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.

Brad Kirr  
Palmer  
99645



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February 17, 2022

Dear Board of Fish,

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 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.

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.

Brad Mitchell

Eugene  
97402



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March 07, 2022

Dear Board of Fish,

I have been spending my summers in Alaska for over 30 years. First coming to the Kenai peninsula when I was just 15 to visit my uncle who was stationed in Anchorage. Each summer after that I increased the amount of time I spent on the peninsula fishing the Kenai. I now am on a mission to bring my 6 kids to share my love of the Kenai. We spend our vacation time each summer solely on the Kenai. Over the last 30 years I have slowly seen the fishery suffer at the hands of commercial needs. If the state keeps prioritizing commercial betters and trawlers over their sports and recreational fisherman and conservationists we you stand to lose a great more than just a species of fish in the Kenai. You stand to lose your tourism dollars.

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.

Bradley Wood

Silver City  
88061



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February 16, 2022

Dear Board of Fish,

I have been fishing the Kenai for 30 years and it is a disgrace what it has turned into. Stop letting the kings die.

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.

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.

Brandon Kaiser

Anchorage  
99515



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February 25, 2022

Dear Board of Fish,

Why risk such a special resource? The last of its kind. I'd sure like for my son to be able catch and release some of these special giants one day. Please protect them.

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.

Brandon Pasley





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March 11, 2022

Dear Board of Fish,

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 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.

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.

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.

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Brant Oliver



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February 17, 2022

Dear Board of Fish,

Hi, I have grown up in Anchorage Alaska and have been fishing the Kenai river and most all the rivers on the peninsula for almost 40 years now. The Kenai holds one of the most diverse and special fishable ecosystems in the world, but you should all know this by now. I am a firm believer that if we lower the escapement goal for any fish species returning to a river system that already suffers from historically low return numbers we are going in the wrong direction. It does not matter WHAT is leading to the low return numbers, allowing more boats, nets, and rods to keep taking more and more year after year is what will eventually lead to a complete shutdown of the fishery. I know for a fact that some of the members on the Board of fisheries don't understand this even though they have more at stake with their own commercial fishing endeavors, because if they did they would see the writing on the wall and sell off anything they have invested in commercial fishing and retire before they are forced to retire. If there is to be a future for the Kings of the Kenai and the rest of south central Alaska we MUST raise the escapement numbers across the region and limit commercial catch and by-catch even if it means shutting down the King fishery for a few years.

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.

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.

Brent Bartholomew

Anchorage  
99507



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February 16, 2022

Dear Board of Fish,

I am firmly opposed to proposition 283 as I feel the King run on the Kenai is and has been in serious trouble for many years, as a Alaskan Fishing guide I have gone as far as completely stopping all fishing for Kong's including Catch and release because of this period of lie abundance. Although I realize most wont take the drastic step that I have to help save the King Salmon I encourage you to take the most conservative approach possible when setting the upcoming seasons and please keep in mind the generations of future fishermen and women who would like an opportunity in the future to be able to again fish for these magnificent creatures once this period of low abundance has passed by us. thanks for your consideration Capt. Brent Bauer

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.

Brent Bauer

Vancouver  
98682



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February 17, 2022

Dear Board of Fish,

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.

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Brett Coffman

sterling  
99669



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February 23, 2022

Dear Board of Fish,

Been fishing the Kenai river since 1994. It's a shame to see what has happened to the king salmon run. No the once plentiful Kenai king salmon is just about gone. Need more restrictions on commercial and sport to bring it back

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.

Brett Gianella

West Linn  
97068



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February 24, 2022

Dear Board of Fish,

60 plus year Alaska resident who who would like to help rebuild the Kenai River King Salmon by limiting both commercial and sport fisheries ability to retain kings until numbers are sustained

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.

Brett Muller

Anchorage  
99517





Submitted By  
Brett Roth  
Submitted On  
3/11/2022 5:30:40 PM  
Affiliation  
Fisher

March 9th 2022

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Comments Submitted By:

Brett Roth

PWS Commercial and Noncommercial Shrimp, Salmon and Halibut Commercial Fishery

7810 Casey Circle

Anchorage, AK. 99507

2022 BOF Comments

## Background

I greatly appreciate the opportunity to comment and will be focusing on several proposals in my comments and why I personally am very against two of them and think several others could improve the fishery. I will also explain how myself, and a large number of other PWS commercial shrimpers prosecute this fishery for the benefit of families and our customers- the customers of this incredible resource. I regret that I will not be attending the meeting until March 28th, I had a trip planned before the meeting date changed. If a hybrid call option is available I will use it. I understand the difficulties the Board has dealt with scheduling meetings of over the past few years and appreciate the commitment to the public process.

In my 2018 comments to the board I wrote *"Fundamentally, I am committed to three things: more research, erring on the side of conservation in management of the fishery and a longer commercial season for the benefit of customers desiring fresh product and fishers who are trying to develop a business in a tough open access fishery."* Five years later, nothing has changed regarding my fundamental goals.

In 2018 I also commented that *"I, and others like me, utilize the fishery in a way different from most fisheries in Alaska in that we are not only fishermen but also direct marketing operations*

*(catcher-sellers) that provide the public with incredibly fresh, often same day, direct from the*

*fishermen seafood that would be the envy of white-table cloth chefs worldwide."* This also has not changed, and anything as interest in the fishery grows and seasons contract it is getting more difficult to do. I also wrote that *"I respect my fellowfishers desire to diversify but I recognize the typical model is to catch as much fish as quickly as possible and that is not the optimal model for a spot prawn fishery."* and *"Different fishers will always have different priorities and I would prioritize this fishery as having the opportunity to develop in a way that allows more Alaskans to enjoy these incredible shrimp and for them to permeate more deeply into our culinary culture. We have one of the world's greatest foods here and to catch it quickly and freeze it is a missed opportunity."*

I know I have been quoting myself, but I want to emphasize that as I've developed this business since starting in the fishery in 2014 my experience of this fishery being a unique opportunity for direct marketers to provide happiness and joy for the everyday Alaskan customers have been consistent and, anything, have only grown stronger. In a given year we will sell prawns to 50 to 100 different individuals, typically in small quantities.

PWS Spot Prawns fishers can flourish with an economic model that differs from many other commercial fisheries in that a longer season with more fresh product can be very beneficial to boats and the consumer. While small boat commercial fishers are familiar with the dynamics of higher prices and happy fresh fish consumers since the implementation of IFQs for Halibut and Salmon for example, the direct relationship between catcher and seller in the PWS shrimp fishery is a different in that the resource is typically consumed locally and a strong relationship is formed between harvester and consumer. In fact, what perhaps has changed since 2014 is we see this business





mode taking hold more and more with fishermen directing marketing the salmon, halibut, blackcod etc. on-line - often a frozen and beautifully prepared product. The PWS spot prawn fishery is well managed, unique and has a huge amount of participation and interest for a fishery of this size - although the board should be aware of and respect. These are the best shrimp in the world and fishermen have a supply problem, not a demand one.

Finally, in 2018 I was involved in authoring two proposals, proposals 218 and 219 which proposed moving the start date of the Shrimp fishery back to May 1st as we wished to shorten the back end of the season, having it end by August 15th. I supported these in part because I was (and am) concerned with the harvest of egg bearing shrimp at the beginning and end of the season in our fishery. I did not submit similar proposals this year but two proposals in particular have caught my attention and have me "paying defense" so to speak.

### Proposal 250

Proposal 250 suggests moving the season start date to March. I am opposed to this proposal. When the 2018 proposals were made to move the start date to May 1st it was commented that it would be a catastrophe, at a minimum this proposal is so a catastrophe but that is not the main reason I think the board should reject it. An earlier start date would result in even larger harvest of egg bearing shrimp which could have negative consequences for the stock and therefore is far too risky to consider even if the board were to see the catastrophe change as a benefit. For the record, I and many others with significant time in the fishery would be negatively impacted by the catastrophe aspects of this proposal and certainly do not see that as a benefit. On the issue of spawner shrimp, in a personal communication with me in 2018, Laurie Convey, from Canada DFO in BC which prosecutes the largest commercial spot prawn fishery in the world shared that they do not start the season any earlier than May 1st specifically to AVOID potential harvest of egg bearing females and allow for improved growth and value of the shrimp prior to harvest. Of note, they are permitted by regulation to open much earlier than May 1st and this is a management decision, however I think this proposal as written would put the department in a box where they would almost have to open too early. As so, back in AK, during the 2018 BOF cycle there was a proposal in the Southeast and Yakutat Shellfish meeting, proposal #79 that suggested moving the October 1st start date of the Southeast AK Spot Prawn fishery to "an unspecified date in April" in order to avoid egg bearing females and better use survey data in the management of the fishery. What I found very interesting though was the department comments from the SE managers which not only **supported** the concept but also **"recommends that the board consider an opening date of May 15 in order to maximize potential benefits"**. I'm sure there are other biological benefits to moving the start date to May, and the egg bearing shrimp that we are catching during this time carry larvae that are very developed and eyes can be clearly seen on the eggs. The earlier start date is a catastrophe again for fishers that are going to me partcipants in the fishery, have developed early summer markets, have developed the business plans around the current mode but also has very real biological concerns. The board should reject proposal 250.

### Proposal 247

Proposal 247 seeks to set a minimum limit of pots in the fishery of 50. The department opposes this proposal because "the current limit of 100 pots or fewer allows fishery managers to target the GHL closely and provide maximum opportunity due to a controlled harvest rate that extends the season. I concur with the department and would add on the relevant point that a controlled harvest rate that extends the season benefits many fishers and local consumers engaged in direct sales of fresh shrimp. This proposal is designed to create a rapidly prosecuted season which results in shrimp going to freezers and only benefits certain types of operations, which largely are not the type of operations currently engaged in this unique fishery. Finally, this would have a negative impact on Alaska consumers who depend on the relationship with individual fishermen to source their preferred shrimp and benefit from a season of a longer duration. While individual Alaskans could purchase frozen shrimp I do not think they would be the target market for as much of the harvest as they currently are. The board should reject proposal 247 because it hampers our excellent management and could make targeting the GHL more difficult, exacerbate a race for fish in a fishery that benefits most from high quality fresh product and will have a negative impact on Alaska consumers.

### Proposal 246

This proposal seeks to eliminate the TAH threshold of 110,000 pounds for there to be a commercial fishery. I support this proposal, not because having a minimum is a good idea but because the current minimum is highly a catastrophe again for commercial users. The current limit of 110,000 *surplus* pounds in order to have a commercial fishery may be too conservative generally. It is particularly problematic that the majority user, noncommercial, is prosecuting a fishery below the 110,000 pound threshold reducing any potential conservation benefits of this threshold. I add that there are other proposals, most notably 240, that could achieve similar benefits possibly in a more comprehensive manner.

Personally, I think prosecuting a commercial fishery and a noncommercial fishery during times of low abundance should be done very cautiously and with significantly reduced harvest or at times no harvest at all to allow for rebuilding. However, below 110,000 pounds I do hope there is still room for both groups to have some equitable harvest opportunity and think that the data provided by the commercial fishery in particular would be helpful to managers in determining stock trends and health because the logbook data is geographically and temporally specific, ongoing and robust. Losing the annual collection of this logbook data unnecessarily during a time of lower abundance is a concern and should only happen if there is a serious stock concern. Were to be at a level where we are concerned with that concerned with the stock then the elimination of harvest effort opportunity should not be born solely by commercial fishers.

It is important to remember that the commercial fishery benefits many Alaskans that enjoy shrimp and can only access it through our local fishermen. The board should not ignore the potential data collection benefits of removing this restriction and should create a situation where conservative harvest can continue to occur by users in a way that allows to markets that have been developed to stay connected to the fishery and everyone to participate. The benefits to Alaskans are real and the department can and will manage conservatively even without this conservative guideline. At a minimum the catastrophe aspect of this guideline needs to be addressed.



## Proposal's 244 and 245

These proposals modify the harvest based on the previous year's harvest. The board may have an opportunity to try and seed something interesting here and it's worth a look. I'd suggest the Board think about what's done in the IFQ halibut and sablefish fisheries as well as how Canada uses similar provisions in the recreational halibut fisheries allowing them to liberalize effort when they are targeting the recreational halibut with the knowledge that going over the GHL has consequences in the following year. In fact, Canada's considering a 3 fish halibut daily limit in the recreational fisheries this year in part based on this approach. These proposals could generate opportunity for Alaskans who are steering towards conservation. The board should consider them and the more important part of the proposal in my eyes is the part that deals with "overages" as opposed to the "underages" since the underages are not a conservation concern.



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March 07, 2022

Dear Board of Fish,

I live in Coeur d' Alene, Idaho. I've always wanted to fish the Kenai River for big kings. Unfortunately, the numbers have been so low that I haven't made it a priority. I would love to see the numbers increase and live out my dream of reeling in a big king on the Kenai!

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.

Brian Baker

Coeur d' Alene  
83815



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March 08, 2022

Dear Board of Fish,

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.

Brian Bouthiller

Peachtree City  
30269



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March 11, 2022

Dear Board of Fish,

I'm a 51 year old sport fisherman from Phoenix. I've been fishing the Kenai since 2006. We have progressively watched the most incredible king salmon fishery degrade in to a shadow of its past. This fishery means so much to those of us that have experienced what it can be. Please, for once make the sound economic and biological choice not to pass 283.

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 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?

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 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.

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Brian Bowers

Scoto  
85260





## BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310  
DILLINGHAM, ALASKA 99576  
PHONE (907) 842-5257

Tribal Councils  
Served by BBNA:

Aleknagik  
Chignik Bay  
Chignik Lagoon  
Chignik Lake  
Clarks Point  
Curyung  
Egegik  
Ekuk  
Ekwok  
Igiugig  
Iliamna  
Ivanof Bay  
Kanatak  
King Salmon  
Kokhanok  
Koliganek  
Levelock  
Marikotak  
Naknek  
New Stuyahok  
Newhalen  
Nondalton  
Pedro Bay  
Perryville  
Pilot Point  
Port Heiden  
Portage Creek  
South Naknek  
Togiak  
Twin Hills  
Ugashik

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

March 10, 2022

Subject: Letter of Support for Proposal 282

Dear Chairman Burnett and Board Members,

The Bristol Bay Native Association (BBNA) strongly supports the purpose of Proposal 282, which would reduce the opening periods in the South Unimak and Shumagin Islands fisheries to protect the Chignik salmon returns. BBNA is the regional non-profit Alaska Native organization for the Bristol Bay Region, of which the five Chignik-area villages are a part.

Exceptionally low returns of Chignik sockeye from 2018 to 2021 have prompted state and federal managers to restrict commercial fishing and even subsistence harvests in the Chignik waters. While these restrictions have largely been supported by the communities and stakeholders as necessary for conserving the runs, additional action is required. The conservation burden should not fall exclusively on the Chignik communities when their sockeyes are still being harvested elsewhere.

Fishermen in the area have been adaptive to changes in resource abundance and marketability. Notable changes have been the development and subsequent closures of King, Dungeness and Tanner Crab, shrimp, and herring fisheries. While the opportunity to participate in these other fisheries locally is no longer available, the sockeye salmon fishery remains the staple that ties the subsistence and market economies together. It is also at the core of maintaining cultural, familial, and community well-being.

At this time, ADF&G simply must provide additional protection for Chignik sockeye in their migration corridor. Proposal 282 will do that while maintaining a balanced burden of conservation and the potential for commercial harvests in both fisheries. We realize there may be some wordsmithing of the proposal in the board process, but we strongly support the concept of



reducing the opening periods in the South Unimak and Shumagin Islands fisheries until the mid-point of the Chignik escapement is reached or there are commercial openings in the Chignik fishery.

Sincerely,

BRISTOL BAY NATIVE ASSOCIATION

A handwritten signature in blue ink, which appears to read "Bruce Baltar", is positioned below the printed name.

Bruce Baltar

Acting President & Chief Executive Officer





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February 26, 2022

Dear Board of Fish,

I guided the Kenai River between 2002 and 2016. There was a significant decline in both early and late runs during this period. I fault State of Alaska for failure to buyout the set nets surrounding the river mouth and not setting larger non gill net zones to prevent annihilation that allow so much overfishing of these King Salmon. Time for all parties to share in the rebuild of these unique King Salmon. I am against Proposal 283.

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.

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.

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.

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Bruce Hewitt

Burbank  
99323



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March 07, 2022

Dear Board of Fish,

I live in Utah and come to the Keani often to fish for red and king salmon. Over the years I have seen a drastic decline in the number of king salmon making the trip back to their spawning beds in this great river. Commercial fishing, not the small number of sport fishermen are the cause. Please stop further decline in this fishery by NOT passing prop 283.

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.

Bruce Jolley

Orem  
84058



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March 09, 2022

Dear Board of Fish,

I'm a 40 year Alaska Resident and moved to Alaska after fishing the Kenai as a 25 year old guest to the state. Nothing is more dear to me than this river and it's existence. I'm crushed by the past decisions to ignore our king salmon at the expense of a commercial industry. We all need equal skin in this game to succeed.

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.

Bruce Morgan

Anchorage  
99507



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February 17, 2022

Dear Board of Fish,

I love fishing in Alaska. The opportunities are endless. But passing Proposal 283 will prioritize 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 of commercial operators preference, further risking the king salmon run in the Kenai River.

I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings of the Kenai River.

Thank you,  
Bruce Odelberg

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.

Bruce Odelberg

Kirkwood  
95646



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February 18, 2022

Dear Board of Fish,

Thank you for the opportunity to comment. I am a 65 year old sport angler and former commercial fisherman (Chignik) who fishes primarily in the Kenai River drainage. Our family owns a cabin on the upper Kenai River, in Cooper Landing, and we spend a lot of time on the river in our drift boat. I have a great deal of sympathy and appreciation for the efforts of commercial fisherman but I have an even greater concern for the resource.

Proposal 283 might be a good idea but it isn't a good idea right NOW.

Let's take a breath and let the kings get back on solid ground before tinkering with the regulations.

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. While I love a big king on the end of my line I haven't even targeted them on the Kenai for over a decade. Anything we do to hazard their recovery is unwelcome and extremely risky.

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.

Bruce Service

Anchorage  
99507



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March 07, 2022

Dear Board of Fish,

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.

Bruce Smith

Yakima  
98908-5724



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February 16, 2022

Dear Board of Fish,

I've witnessed first hand the decline in kings. Something needs to be done now and changing the rules to allow more predation by commercial fisheries is not it.

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.

Bryan Hansen

Bluffdale  
84065





Submitted By  
Bryan Kirby  
Submitted On  
3/11/2022 10:44:43 PM  
Affiliation

Phone  
907 232 8111  
Email  
[Bryan.Kirby@gmail.com](mailto:Bryan.Kirby@gmail.com)  
Address  
HC 89 Box 809  
Wetland, Alaska 99688

Proposed 257: 5 AAC 58.0xx and 5 AAC 77.5xx. East Cook Inlet Razor Clam Sport and Personal Use Fishery Management Plan.

I am in support of this.

I have been part of the Sustana AC for a few years now and I see the value of having a management plan vs not having one in when there is a stock of concern. I believe by having this plan the razor clam harvest will be more transparent.

Proposed 259 / 256 5 AAC 58.022. Waters: seasons: bag, possession, and size limits; and specific provisions for Cook Inlet-Resurrection Bay Saltwater Area.

I am in support of these.

I have been taking people across the inlet to the Crescent River drainage and also to Point Creek for the last 15 years with my charter company. I take an average of 20 trips a year with 6 people on each trip and the last 3 or so years it has been 2 boats so that would be 12 people per trip. The last 3 or so years I have taken an average of about 115-120 people camping each year to the west side of Cook Inlet. From all of those people I would say there are maybe 10-15 people that get more than 2 buckets (10 gallons) of clams in a day. The proposal by ADF&G is very reasonable and will help with keeping the clam population abundant.



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February 26, 2022

Dear Board of Fish,

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.

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 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.

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.

Bryana Sims

Kenai  
99611



Submitted By  
Buck Laukts  
Submitted On  
3/11/2022 5:52:40 PM  
Aff at on

Phone  
9072990112  
Email  
[Buck.magcfsh@gmail.com](mailto:Buck.magcfsh@gmail.com)  
Address  
41630 G adys Ct  
Homer, Alaska 99603

Proposa 282

I support taking NO ACTION on proposa 282.

I have fished the set net, g net and se net fsheries in Area M since 1989. My wife and I raised our family in Fa se Pass where we lived for 25 years. We currently live in Homer and fish and work in Fa se Pass, King Cove, Sand Point and Dutch Harbor. I've chosen to fish there, because I love the country, and I love the resilient, competitive, hard working local fishermen.

The Board started this chain of events by breaking its own policy. As the Department states in the comments this is an alternative proposal. It should never have been taken out of cycle. So right off the bat some members of the Board appear very motivated to take action, any action, even if it is a flawed proposal like 282. Alternatively I urge you to take up Chignik alternative and other proposals next year when you have the benefit of diverse public proposals in cycle. Please have the benefit of the Department's latest science (e.g. productivity analyses and revised escapement goals).

The Board's first principle should be to do no harm. Why do economic harm on three Alaskan communities (Fa se Pass, King Cove and Sand Point) in the HOPE of helping one? HOPE is not a strategy. Did the Board act on curtailing the Dog Islands and section get the desired result? Did curtailing the Kodiak salmon and Igvak history get a commensurate benefit for Chignik? Hard to say? We then they probably weren't very precise management tools.

The Department has shown it has the authority to manage any real unforeseen conservation issues this coming season as it has in the past.

As a fisherman I know that there is no correlation or cause and effect between my sockeye catch and Chignik stock conservation. This past season we caught a lot of sockeyes. It had been a very long time since sockeye set in the June fishery. But the sockeye we caught were 3.5 pound fish and going west. I don't need a genetic stock analysis to know that what we caught were not Chignik fish. This season we have the largest sockeye forecast ever in Bristol Bay. The Board would be negligent to curtail opportunity in Area M to harvest the state's valuable resources. Fueling our processors and fishermen will be essential to maximize the value of the Bristol Bay run.

I'd like to remind the Board that we are in an economic crisis of unparalleled dimensions. Fuel and transportation costs and supply chain disruptions are going to our very challenging for our businesses. Our remote coastal communities are in peril. No Area M fisherman wants to hurt Chignik residents. We all need to survive, but this proposal isn't the right approach for Chignik. Please do no harm until you can identify a better course of action than simply cutting our fishing time.

A good friend from King Cove probably said it best about our mixed stock fishery: "The river where we fish is right outside our harbors. That's why our communities are there. It's all in the ocean, but the fish come by from June to September. It's not a ways predictable, but that's all we have to rely on."



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February 15, 2022

Dear Board of Fish,

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.

Callie Benjamin

Anchorage  
99501



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March 07, 2022

Dear Board of Fish,

I live in Arizona and I come to fish camp on the Kenai annually which I have done for the past 8 years. The salmon in the Kenai have been effected by the over fishing of the commercial fisherman for several years now. Passing Proposal 283 will just add to the over-fishing and I believe will have a lasting and devastating effect on the Kenai River and king salmon. Do not pass 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.

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.

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.

Candace Shelton

Tucson  
85719



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February 19, 2022

Dear Board of Fish,

King Salmon fishing needs to be Closed for 7 straight seasons in order to facilitate their recovery without harassment by anyone including commercial harvest by using a smaller mesh net and limiting the depth of the net.

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.

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.

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.

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Carol Keller

Soldotna  
65616



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February 16, 2022

Dear Board of Fish,

Give Kings a chance, don't lower escapement #,  
You have a choice- low commercial #'s now or no kings in future- temporary or permanent!

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.

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.

Cartier Wendy

Soldotna  
99669





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February 24, 2022

Dear Board of Fish,

Changing these regulations will lead to a drastic increase in harvest of king salmon who's population is in dire need of protection, just so a few setnetters can make an extra few hundred to few thousand dollars each. Allowing the nets to go in even if the run is hurting so much they close the river to sport harvest is Putting the future of the kenai king run in dire peril! It's not worth it!! Set net king harvest numbers are not recorded properly with many fish falling out of the nets dead before they get pulled and a great many fish being brought home as home pack for personal use so as to not be recorded.

If you don't believe it go walk the kasilof beach personal use set nets in June. You will see more dead kings being pulled out of the nets than sockeye! Now imagine this on a commercial level!

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.

Cayla Chadwick  
Soldotna  
99669



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February 18, 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.

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.

Charles Bowman

Hartsburg  
65039



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March 12, 2022

Dear Board of Fish,

I am a lifelong Alaskan that has sport fished for king salmon on the Kenai for as long as I can remember.

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.

Charles Courtright

Eagle River  
99577



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: Comments on Proposal 282**

Chairperson Carlson-Van Dort and Board Members:

My name is Cherilyn Lundgren and I live in Sand Point. I am employed with Aleutians East Borough School District as the Business Office Specialist. I have worked for the district for 16 plus years. I am also the wife of an Area M seiner and have children that fish Area M.

I am writing to oppose Proposal 282. The impact this would have on our communities would be devastating.

The Aleutians East Borough is home to over 3000 Alaskans, many with a heritage in the Eastern Aleutians that goes back hundreds of years. Our population has always been dependent on fishing. We have no other industry that sustains our communities. Without jobs to sustain our families through the winter, many families would be displaced from their homes. Without fishing, we cannot maintain our cities and local jobs. This will have immeasurable impact on our families and schools. The School District employs locals, who know and care for our children. We may need to cut those jobs because of the loss in enrollment and revenue.

Since I have worked with the School District, I have seen the effects fishing has on our communities. The School District had 6 schools in our District and 2 of the 6 have closed. The other 2 small sites have struggled over the years to keep the student count above 10. We are still struggling to keep the student count above 10. Sand Point has dropped below 100 for the first time since the Aleutians East Borough School District formed. This will have a financial impact on the School District funding for this upcoming school year. Fortunately, the Borough has helped with funding to keep these schools in operation when they have dropped under the student count required for State funding. Without the revenue from the fish taxes, there is no guarantee the Borough would be able to help the schools stay open.

Thank you for your time.

Sincerely,

Cherilyn Lundgren



**CHIGNIK INTERTRIBAL COALITION  
427 AIRPORT ROAD  
CHIGNIK LAGOON, ALASKA 99565**



PC080  
1 of 1

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

March 11, 2022

**Support Proposal 282**

Dear Chairman and Board Members,

These comments are submitted on behalf of the member tribes of the Chignik Intertribal Coalition (CIC). The CIC comprises Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay, and Perryville.

Exceptionally low returns of sockeye between 2018 and 2021 have prompted a concerted effort by our communities and tribal members in conserving our runs. At this time, additional actions are required to ensure the sustainability of our main resource.

Our tribal members have been adaptive to changes in resource abundance and marketability. Our sockeye salmon remains the primary element that ties the subsistence and commercial fisheries together. It is also at the core of maintaining our cultural heritage and community well-being.

Proposal 282 asks only that fishing time in the Shumagins and Dolgoi Islands be reduced if the midpoint of the Chignik River early-run sockeye salmon escapement goal range is not being met. This is reasonable. Proposal 282 will do that while maintaining commercial harvests in both the Shumagin and Dolgoi Island areas and potentially increasing the number of sockeye salmon returning to CMA.

The Shumagin and Dolgoi Island salmon fisheries should not be exempt from sharing the burden of conservation on stocks immediately bordering their fishing areas.

Sincerely,

George Anderson

Chignik Intertribal Coalition, President

March 10, 2022

Alaska Board of Fisheries

Board Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

The Chignik Lagoon Village Council would like to express that the vitality of this community is extremely dependent on the Chignik salmon runs which fuel the subsistence and commercial fishing livelihood of our people. The mainstay of our economy are the two sockeye runs which have gone from historically strong to now very weak. The early run has not even reached the lower end of its escapement goal since 2017.

Passing proposal 282 would be monumental to Chignik (and other fisheries who rely on Chignik as a hatchery to sustain their runs), as it calls for Shumagins and Dolgoi fishing areas to assist in reaching our early run escapement goals. This proposal is reasonable because Chignik-bound sockeye are caught in both areas, therefore the burden of conservation should fall on the shoulders of both. The Chignik fishery is suffering now, but other fisheries will suffer in the future as the Chignik River acts as a hatchery for other runs. Proper escapement is of the utmost importance for conservation of these runs and future fisheries.

Chignik communities have small representation, so we need your help to protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

Chignik Lagoon Village Council





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February 18, 2022

Dear Board of Fish,

I live in Redmond, Washington and have seen Puget Sound fisheries decline to where there is very limited fishing. It would be terrible to see the Kenai River fisheries reach a similar outcome due to a short-term management perspective. The proposal is an incredibly bad idea to lower escapement goals to allow commercial fishing as it risks putting the King Salmon fishery on a death spiral that will forever limit future fishing opportunity for all.

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.

Chris Chu  
Redmond  
98053





Submitted By  
Chris Every  
Submitted On  
3/10/2022 11:42:07 AM  
Affiliation

I am in support of proposal to 283.

If there are any thoughts from the commissioner, BOF members, ADF&G (Commercial and Sport) to allow the ESSN fishery to have some harvest opportunity during an Inver-King Salmon closure, ESSN fishermen would greatly appreciate your suggestions.

I believe we should be allowed to fish on ADF&G's project on of the SEG.

Most fishermen in Alaska are allowed to fish on an ADF&G project on of achieving the SEG or OEG. Why should the ESSN fishery be held to a different standard.

The proposed restrictions are very bias toward the Setnet group.

All user groups are allowed to participate in the sockeye fishery except the ESSN group.

ESSN should be allowed to participate now that the 600 fishery has been placed on the table. (Numbers are the proof)

Last, it seems to me that we are fighting the entire state to be allowed to fish, when the regulation book states the commercial fishermen are to be the primary harvester of sockeye salmon,

Let's work together and get the ESSN in the water.



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February 18, 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.

Chris Stephend

Sterling  
99673



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March 08, 2022

Dear Board of Fish,

I own a cabin on the Kenai river and enjoy the benefits of being allowed to fish this beautiful river, while I would love the opportunity to catch a king, I fully understand the need for all of us to carefully manage and control the continued stocks of these magnificent species, to allow commercial fisheries to start to harvest again would be unfair to others and to the the species itself. I would be in favor of stopping all fishing of kings for up to a five year period if it meant the restoration of kings for the future.

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.

Christopher Batters

Anchorage  
99515



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February 19, 2022

Dear Board of Fish,

We have a house on the Kenai River and have seen the king salmon run diminish every year. This fishery needs better management and it is hard to argue that stopping set nets near the Kenai will enhance escapement. The incidental harvest of chinook salmon is not insignificant and likely more than what is taken by all sport fisherman. This is a favorite river amongst tourists and needs protection from commercial fishing.

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.

Christopher Manion

kenai  
99611



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February 28, 2022

Dear Board of Fish,

I am an Alaskan resident residing in Palmer AK. I work on the North Slope as a facility operator. I have lived in Alaska for just shy of 20 years. I love to hunt and fish and enjoy all that Alaska has to offer. I am frustrated with the bad judgement when it comes to fishing regulations that have a bias toward the commercial side of the industry. I remember being able to fish local rivers in the valley for King salmon. Around 2008, that all changed and has yet to return to what it was prior. Now the same thing has happened on the Kenai and other rivers on the peninsula. Why is it so hard to take the high road and regulate our fisheries with the mindset of preserving it rather than only thinking about how much money you can stuff in your pockets. The majority of revenue from commercial fishing doesn't even stay in Alaska. Sport fishing has always been more profitable for Alaskans. How much money and how many businesses need to disappear before this makes sense? I urge you to do the right thing and vote NO on proposal 283 and make the priority about preserving our resources instead of exploiting them.

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.

Christopher Meltz

Palmer  
99645



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March 08, 2022

Dear Board of Fish,

Hello I am a 54 year resident of Alaska  
I have been fishing the Kenai River since 1974  
and have lived on the River for the last 10 years  
The king fishery's impact has limited tourism for at least the last five years  
I firmly believe that the fishery needs to be closed period no salt, set net, or river fishing  
Thank you

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.

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.

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.

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.

Christopher Mizo

Kenai  
99611



February 24, 2022

Dear Board of Fish,

I recently acquired my property in Alaska after 20 years of traveling to the Kenai to fish and vacation. I am appalled at the impact on the king salmon fishery over the last several decades and encourage the Board to make common sense decisions to provide consistent and fair protections that apply to all - commercial and non-commercial. I bought property so my children and grand children will have the opportunity to catch a king salmon someday and understand the beauty of Alaska and all it stands for.

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.

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Signed  
Chris Smith

Christopher Smith

Soldotna  
99669





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February 16, 2022

Dear Board of Fish,

I am a lifelong born and raised Alaskan, I grew up fishing the Kenai river and have been all over the state fishing. I have retired and now live in Kenai on the river and it's very personal to me to preserve the resource. Our community is very tourism driven and history has shown the massive increase in tourism to our community started after Les Anderson caught the world record king salmon on this river. Without the world class fishing this river is known for that bring tourists from all over the world to our state. These businesses lose their livelihoods. Tourism is one of the biggest industries for our state. People who come to fish buy fishing gear, fuel, food, hotels. They support our entire local economy where their money supports our community and year round Alaskans. Commercial fishing does not support any of the local businesses and most crew are from other states so what money is made does not support our state. Please do not pass this proposition. Our king run is in severely threatened status and needs to be protected at all costs

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.

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.

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.

Christopher Trueblood  
Kenai  
99611



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February 15, 2022

Dear Board of Fish,

I live in Anchor Point and dipnet the Kenai. I'd be happy to give up on that completely if it would help the kings. If cutting back commercial would help I'm all for that. I do believe the catch further out in the ocean has an even bigger impact but helping kings where we can is something I support. Or open it for all to catch and put them on the endangered species list in the near future. History is watching what we do today and will judge us.

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.

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 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'm not as sure about this. I don't envy you your jobs.

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.

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Christy Tyler



# Long-term perspectives on freshwater habitat in the Chignik Watershed

By: Dr. Daniel Schindler, University of Washington School of Aquatic and Fisheries Sciences,  
deschind@uw.edu;

(11/2021 presentation to the Alaska Corps of Engineers, Anchorage, AK)

## ***EXECUTIVE SUMMARY***

1. The Chignik watershed functions as a diverse network of rearing habitats (Sockeye rearing occurring in Black and Chignik lakes, Chignik River and Lagoon)
2. Climate warming has improved the growth conditions of juvenile sockeye salmon in the Chignik watershed (producing larger fry; Chignik Lake which provides important early-run and late-run rearing habitat will improve from increased warming);
3. Importance of Black Lake for growth of juvenile sockeye is highly variable among individuals and among years (Annual diversity occurs in rearing strategies and habitats used (Black L, Chignik L. and Chignik Lagoon);
4. While Black Lake has undergone some transformations which began in the late 1960's, current monitoring indicates that the lake and its outlet area on Black River have stabilized over the last decade. There is no evidence that either geomorphic change or climate change has negatively impacted sockeye production from the watershed. In fact, long-term ecological monitoring throughout the watershed shows conclusively that juvenile rearing conditions have improved substantially from the 1960s to the present as lakes have warmed up with ongoing climate change.
5. A future loss of important early-run rearing habitat could develop. Alec River, the principal spawning habitat for the early run enters Black Lake via two channels; the south channel flows into the lake's smaller, lower basin while the north enters the lake's primary, larger basin. If the south channel were to expand to cause the loss of the north channel flow, sockeye fry access to the lake's main rearing area could be severely compromised leading to lower early-run productivity. The potential risks and benefits to sockeye of different habitat interventions that would stabilize flows from the north and south channels should be assessed as part of ongoing scientific research in the watershed.



6. Based on computer modeling and analysis of historic data, increasing the elevation (volume) of Black Lake will likely have little effect on sockeye rearing use and survival in Black Lake due to elevated temperatures with expected future climate conditions. However, warming trends are very likely to continue improving the growth opportunity provided in Chignik Lake. Thus, maintaining connectivity among the various habitats throughout the Chignik watershed will ultimately provide resilience to the overall sockeye salmon stocks in this ecosystem;
7. Annual low returns in Chignik's early-run and late-runs are likely associated with greater early-marine mortality and the possibility of reduced pelagic (blue-water) rearing conditions in the Gulf of Alaska, that have had similar effects on other sockeye systems draining to the Gulf throughout this region.



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March 07, 2022

Dear Board of Fish,

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.

Cody Marvel



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February 16, 2022

Dear Board of Fish,

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.

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Colby Duxbury

Stanwood  
98292



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February 16, 2022

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Colby Duxbury

Stanwood  
98292





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February 20, 2022

Dear Board of Fish,

I live in MN but vacation in Kenai. My friends own a resort on the Kenai River and he is a guide. I have fished all my life both here and in Alaska. I feel that lowering the escapement goal of King Salmon would be a detriment to the future populations in the river. I am a big fan of catch and release, as I truly love the sport of fishing. Please don't endanger the future of sport fishing.

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.

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Colette Fitterer

Brainerd  
56401



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February 16, 2022

Dear Board of Fish,

I'm a long time Alaskan (50+years) who has fished and followed fish politics all my years in Alaska.

I'm also a former member of the F&G Citizen Advisory Council. I oppose any regs that would reduce the Kenai River King run. No where else in the world is there a fisheries resource available to the general public like the Kenai Kings. They should be managed to only increase their numbers. Thanks for considering my point of view

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.

Con Bunde

Anchorage  
99517

**CONCERNED AREA M FISHERMEN**  
35717 Walkabout Road, Homer, Alaska 99603  
(907) 235-2631

Chairwoman Marit Carlson Van Dort, Alaska Board of Fisheries  
Alaska Board of Fisheries  
P.O. 25526  
Juneau, Alaska 99802-5526

March 10, 2022

Dear Chairwoman Carlson-Van Dort and Board of Fisheries members:

Re: **Proposal 282** -- 5 AAC 09.365 South Unimak and Shumagin Island June Salmon Management Plan and 5 AAC 09.366 Post-June Management Plan for the South Alaska Peninsula.

**CAMF (Concerned Area M Fishermen) opposes proposal 282, and recommends the Board take NO ACTION on this proposal at this time.** The Board will consider regulatory changes for the Alaska Peninsula and Chignik salmon fisheries at its regular 2022/2023 meeting cycle. The Alaska Department of Fish and Game has recently completed an escapement goal review for the Chignik system, and it seems highly likely that the escapement goals under which the Chignik system is managed will be changed for 2023. The basis for the proposed management of the Shumagin Island fishery, as contemplated in Proposal #282, could well be rendered moot by different escapement goals in place for Chignik in 2023. Also, the Department has forecast the Chignik system will meet its escapement goals and provide for a harvestable surplus for the 2022 season, for both the early and late sockeye runs. In addition, the Department has previously used its emergency authority to restrict the South Peninsula fisheries if it appears the Chignik system is dramatically below its escapement goals, and they could certainly do so in 2022 should this forecast prove significantly inaccurate. For these reasons, CAMF believes it is premature to take Board action, which may significantly impact the South Peninsula fishery for 2022, when the landscape for management of the Chignik system could change dramatically in the following season.

CAMF represents 110 salmon gillnet permit holders (about 75% of the active drift gillnet fleet) who fish the Alaska Peninsula. A significant portion of our membership lives on the Kenai Peninsula, Kodiak, and the coastal communities of the Alaska Peninsula. While CAMF members do not participate directly (other than members who also hold set net and seine permits) in the Shumagin Islands fishery we also depend on it. Many of our members are local residents. Almost all our members use facilities in Sand Point, King Cove, and False Pass for services that are vital to our fishery. These towns rely on fish tax revenue that fishers provide, and we rely on processing companies, numerous local businesses, and harbor facilities to keep our operations going. If the proposal is passed as written there could be a change in fleet dynamics, and economic cost, that is at this time hard to quantify.



CAMF has been active in the Board process for over 30 years; and has contributed in part to the development of these current management plans. CAMF representatives also served on the Western Alaska Salmon Stock Identification Project (WASSIP) Advisory Panel from which much of the science on the western Alaska salmon fisheries was derived

In the attachment to these comments, we review the South Peninsula June fishery, including the history and importance of the fishery and prior Board actions and findings. There has been a long history of regulatory action in this fishery and we urge Board members to review this history for familiarity. The Board of Fisheries has held three in-cycle Alaska Peninsula meetings—in 2013, 2016 and 2019--after the release of WASSIP. We include BOF actions taken at these meetings that directly address issues related to Proposal 282--which is the first Agenda Change Request generated proposal accepted by the Board for this fishery in 25 years.

Also included with these comments are portions of NPAFC Newsletter No.36 pages 26 to 32 “*Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries*”, which is a valuable synopsis of WASSIP. In addition, we discuss WASSIP results, including harvest rates, stock composition, and variability between fisheries and yearly seasons.

Thank you for taking the time to review these comments. CAMF again urges the Board to take no action on Proposal 282 at this March 2022 meeting and instead wait to address these issues during the regular meeting cycle next when all of the information pertaining to the Chignik system is available for Board consideration.

Sincerely,

Steve Brown, President  
35717 Walkabout Rd.  
Homer, AK 99603





Figure 1.



### Harvest Rate vs Stock Composition of all WASSIP fisheries with a Harvest Rate greater than 1%

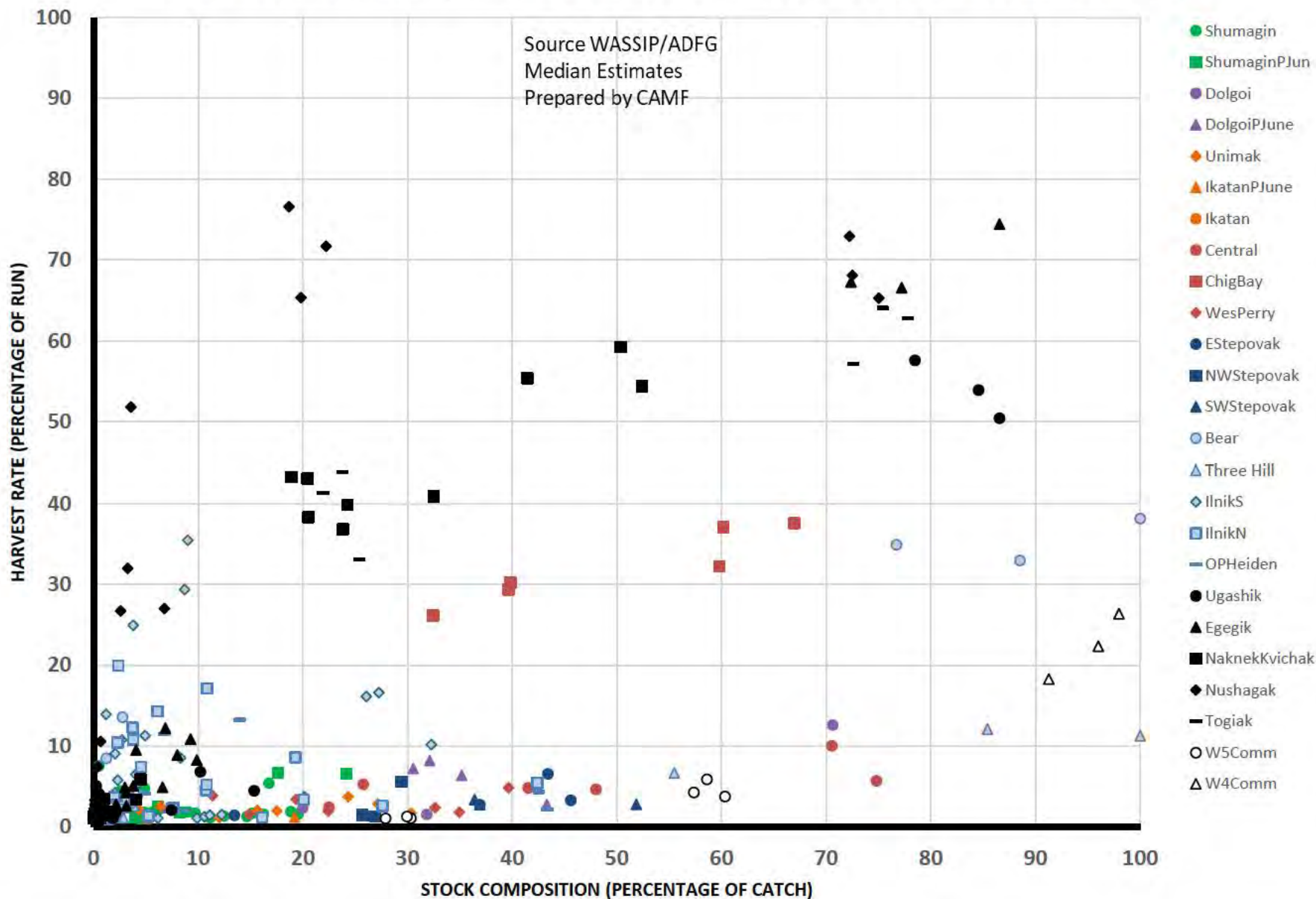
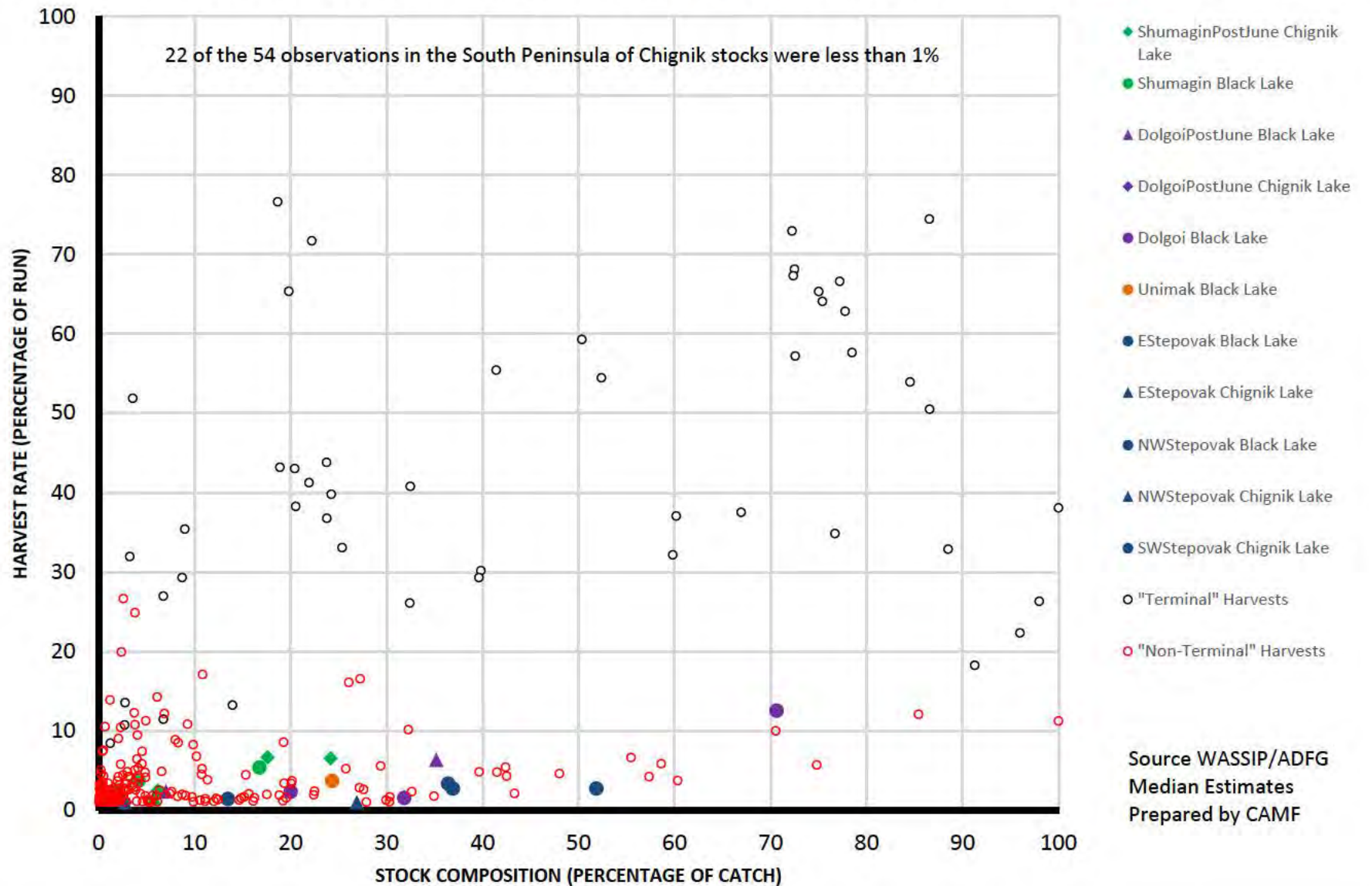


Figure 2.



## South Peninsula Fisheries of Chignik Stocks are Highlighted (06,07,08)

### Harvest Rate vs Stock Composition with Harvest Rates Greater than 1%



## Stock Composition Compared to Harvest Rate.

While detailed estimates of stock composition and harvest rates for years after WASSIP are not possible it is possible to make general references comparing different fisheries throughout Western Alaska.

**Figure 1** is a scatter plot with Harvest Rate on the vertical axis and Stock Percentage of Catch on the horizontal axis for all WASSIP fisheries during all years (2006-2008). Fisheries with harvest rates of less than 1% on a given reporting stock in a given year are excluded to reduce clutter; consequently, 340 of the 1777 possible combinations remain and are represented on the plot. In general, fisheries prosecuted in terminal areas have higher harvest rates but not necessarily higher stock percentages. The Shumagin Is. fishery, shown in green, is characterized by low harvest rates. Reduction in fishing opportunity in the Shumagin Is. would provide limited benefit to the Chignik fishery.

**Figure 2** is the same plot as Figure 1 but differentiates “terminal fisheries” (black circles) and “non-terminal fisheries” (red circles) with the South Peninsula fisheries highlighted. 22 of the 54 observed South Peninsula fisheries during WASSIP fall below the 1% harvest rate threshold on the plot. Notice again a vast majority of the black circles represent higher harvest rates, while red circles occupy lower harvest rates. On the other hand, black and red circles are represented at all stock composition rates.

Simply having a high stock composition in any given fishery has little significance in fisheries management without information about the size of the catch compared to the size of the run. CAMF is firmly committed to future research, we always have been. We are strongly against future studies that don't include harvest rate estimates, which in turn, promotes propaganda against our long standing mixed-stock fisheries. We look forward to working with the department in any well-thought-out plan and believe they have the ability in the future to produce the same world-class science they have produced in the past.

Due to the low harvest rates of the Shumagin Is. fishery CAMF believes that the board's Mixed Stock Policy should be applied, and Proposal 282 is an allocation decision. If the proposal where to pass little gain would be achieved in the Chignik Area.

## WASSIP Results

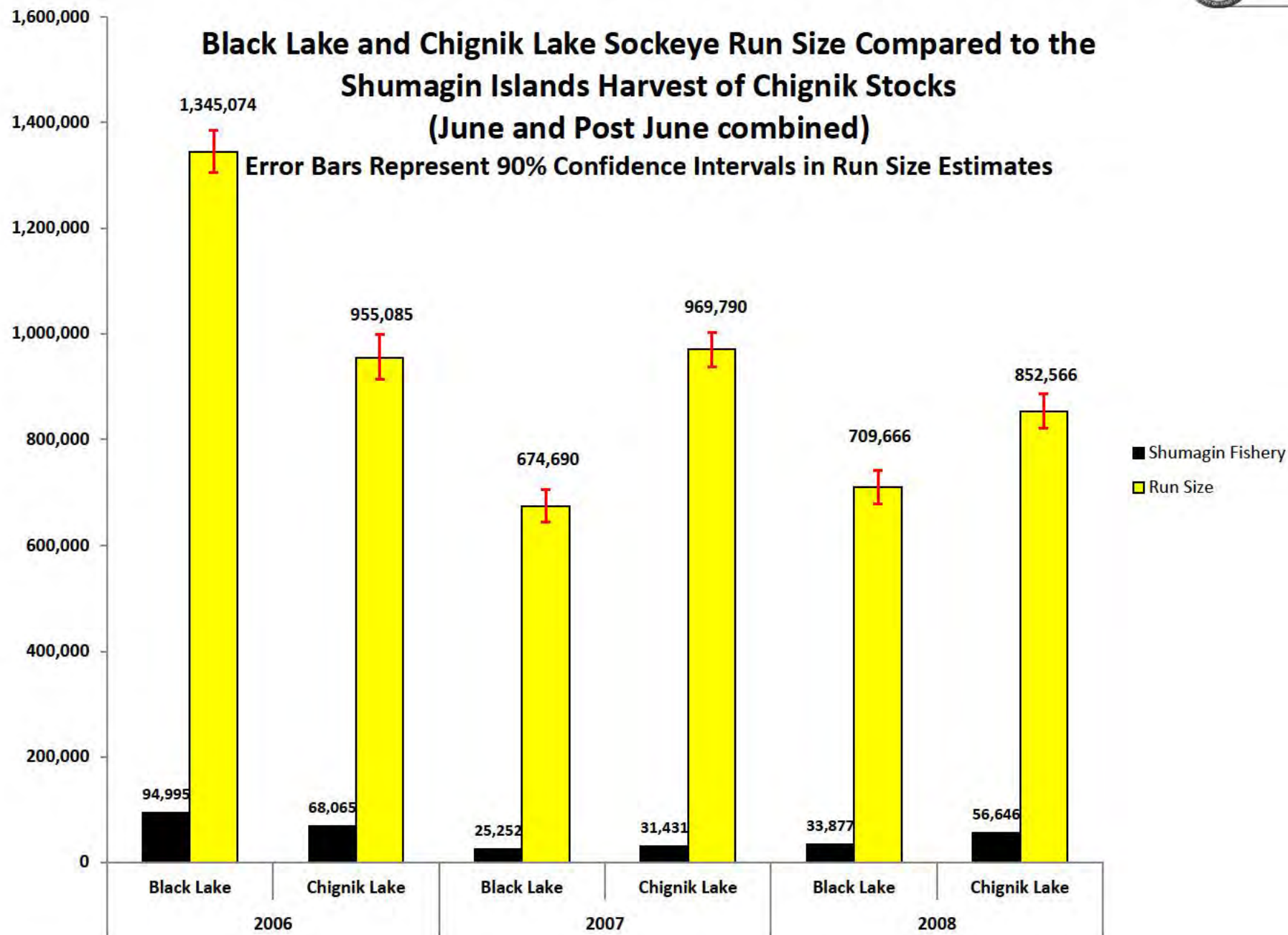
**Figure 3** compares the run size of the Black Lake and Chignik Lake reporting stocks to the sockeye catch in the Shumagin Is. during the WASSIP years. In 5 of 6 observations the 90% confidence interval range is greater than the Shumagin Is. median estimate.

**Figures 4 and 5** details the portion of the total run estimated (median values) returning to the Chignik Management Area and is represented by the bright red portion of the pie graphs in the figures. The gold section of the pie graph represents the Shumagin Island fishery directly related to Proposal 282.



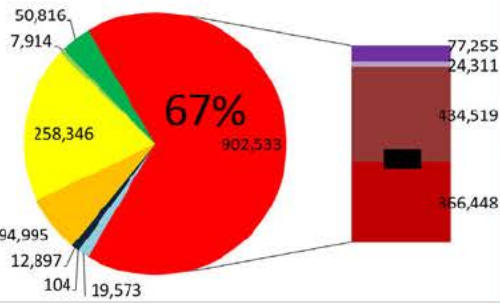


Figure 3. Black Lake and Chignik Lake Run Size compared to Shumagin Is. Harvest.

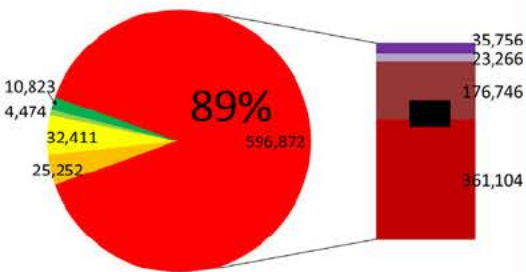


Number of Sockeye are Median estimates per WASSIP

2006



2007



2008

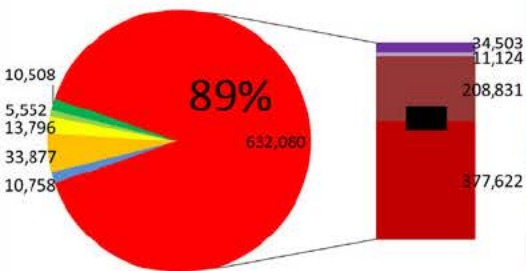


Figure 4. Sockeye returning to Chignik Management Area.

# Black Lake Reporting (WASSIP Total Run)



PC097  
7 of 22

Ikatan, Dolgoi I. and Shumagin Is.  
Include  
Harvest in June and Post-June

Median catch estimates shown for each area each year



Sockeye Returning to Chignik Management Area

Escapement

Escapement Goal Range  
350K to 400K

**Escapement**  
2006 366,448  
2007 361,104  
2008 377,573

**Chignik Bay**  
2006 434,519  
2007 176,746  
2008 208,831

**Central**  
2006 77,255  
2007 35,756  
2008 34,503

Escapement

Central

Western and Perryville

**West Perry**  
2006 24,311  
2007 23,266  
2008 11,124

Dolgoi Island

	June	Post-June
2006	171,745	86,601
2007	16,051	16,360
2008	11,248	2,548

Shumagin Is.

	June	Post-June
2006	73,914	21,081
2007	15,618	9,634
2008	26,992	6,885

Ikatan

	June	Post-June
2006	7,736	178
2007	3,946	528
2008	10,508	99

Unimak

	June
2006	50,816
2007	10,823
2008	10,508

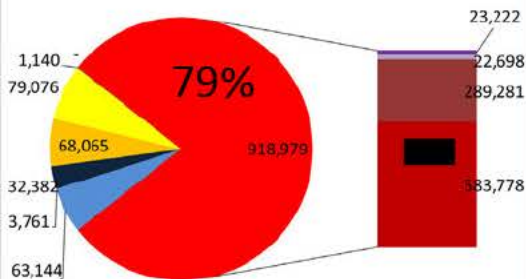
Unimak

Source ADFG WASSIP  
Median Values

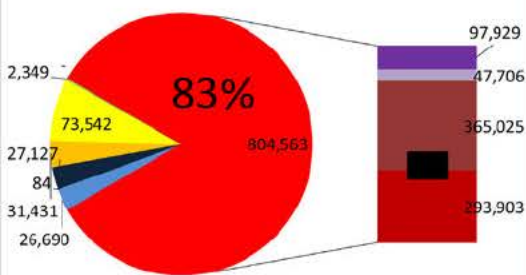
Prepared by Tom Wooding



2006



2007



2008

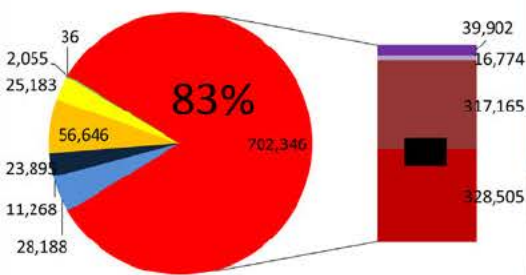


Figure 5. Sockeye returning to Chignik Management Area.

# Chignik Lake Reporting (WASSIP Total Run)



PC097  
8 of 22

Ikatan, Dolgoi I. and Shumagin Is.  
Include  
Harvest in June and Post-June

Median catch estimates shown for each area each year



<b>Escapement</b>	<b>Chignik Bay</b>	<b>Central</b>
2006 583,778	2006 289,281	2006 23,222
2007 293,903	2007 365,025	2007 97,929
2008 328,505	2008 317,165	2008 39,902

Escapement

E. Stepovak

NW Stepovak

SW Stepovak

Western and Perryville

<b>West Perry</b>
2006 22,698
2007 47,706
2008 16,774

Dolgoi Island

Dolgoi Island

Shumagin Is.

Shumagin Islands

	June	Post-June
2006	5	79,071
2007	2,303	71,239
2008	1,025	2,548

	June	Post-June
2006	3,536	64,529
2007	6,836	24,595
2008	0	56,646

Unimak

Ikatan

Unimak

Ikatan

	June
2006	0
2007	0
2008	36

	June	Post-June
2006	0	1,140
2007	1	2,348
2008	0	2,055

Source ADFG WASSIP  
Median Values

Prepared by Tom Wooding



## WASSIP and Regulatory Changes Afterward

The 9-year, 9-million-dollar WASSIP study was essentially a snapshot of longtime Western Alaskan salmon fisheries in the years 2006 to 2008 for sockeye, and 2007 to 2009 for chums. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the study. Steve Brown and Pat Martin were CAMF's Advisory Panel representatives.

The full sockeye report can be found at:

<https://www.adfg.alaska.gov/FedAidpdfs/SP12-24.pdf>

There are some important factors to consider when examining the harvest rate results. In the report on page 35 of “Habicht, C., A. R. Munro, T. H. Dann, D. M. Eggers, W. D. Templin, M. J. Witteveen, T. T. Baker, K. G. Howard, S. D. Rogers Olive, H. L. Liller, E. L. Chenoweth, and E. C. Volk. 2012. Harvest and Harvest Rates of Sockeye Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2006-2008.”

*“Most genetic stock identification studies for salmon in Alaska limit reporting to calculated stock proportions in the sampled fishery strata. The extension of estimated genetic stock proportions in WASSIP fisheries to stock-specific harvest rates represents a broader application of genetic stock identification than first envisioned for the WASSIP study. Estimation of harvest rates provides a fundamentally different view of stock-specific fishery impacts, but requires detailed assessments of harvest and escapement for WASSIP fishery stocks, with explicit statements of uncertainties associated with each. However, when considering harvest rates, it is important to recognize that they are likely overestimates of true harvest rates. This is because our estimates of stock-specific escapement are almost certainly biased low (see Eggers et al. 2012) and we are also unable to account for harvest of WASSIP stocks outside of the WASSIP area. Each of these contributes to estimates of stock-specific total runs (denominator in harvest rate calculations) that are biased low, which results in harvest rate estimates which are biased high. While stock-specific harvests and harvest rates have been estimated for Bristol Bay sockeye salmon (Dann et al. 2009; Dann et al. 2011), these estimates were based upon a much more limited geographic range of fishery sampling, robust stock assessment, and a greatly reduced genetic baseline relative to WASSIP.”*

In addition, the WASSIP study comments on variability and making inferences within and outside WASSIP years on page 38.

*“Like most other scientific studies, WASSIP analyses represent environmental and fishery conditions during a specific period of time. Nonetheless, these studies are conducted so that future scientific and policy activities may be better informed. We expect that WASSIP results will be cited for many years to come as the most comprehensive data set available to examine stock composition of sockeye and chum salmon in commercial and subsistence fisheries of Western Alaska. However, while this three-year data set provides some measure of interannual variability in stock composition, some caution must be exercised when extrapolating the results to years not analyzed because changes in relative abundance among reporting groups, prosecution of*



*fisheries, or migratory behavior due to ocean conditions might affect distribution of stock-specific harvests among fisheries.”*

This snapshot was taken with the regulations that existed at the time of the study. Since then, regulations have changed, more specifically they have changed with respect to the Proposal 282 which you are considering at this meeting.

The changes to the fishery are best described in ADFG Regional Information Report No.4K21-12, “South Alaska Peninsula Salmon Annual Management Report, 2020, and Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amilia Islands Management Areas” by Elisabeth K.C. Fox, Tyler D. Lawson and Ross L. Renick. Pages 4 and 5.

<https://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2021.12.pdf>

*“In 2013, the BOF discussed proposed changes to the regulations involved with the June management plan. The BOF modified the June schedule for seine and drift gillnet gear by delaying the start date to June 10, which reduced fishing time by 64 hours. The June fishing schedule for set gillnet gear remained unchanged (Appendix B1). During the February 2016 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the BOF made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365) and the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366) by adopting regulations to limit the number of sockeye salmon harvested in the Western Alaska Salmon Stock Identification Program (WASSIP) described “Dolgoi Island Area” (statistical areas 283-15 through 283-26 and 284-36 through 284-42; Appendix B3). From June 1 through July 25, a harvest limit of 191,000 sockeye salmon, based on fish ticket information, was created. Once this harvest limit is reached, the portion of the West Pavlof Bay Section south of Black Point (statistical area 283-26) and waters of the Volcano Bay Section (statistical areas 284-37 through 284-39) are closed to commercial salmon fishing through July 25 (Appendix B3). However, the portion of West Pavlof Bay Section south of Black Point (statistical area 283-26) may reopen to commercial salmon fishing on July 17 (Appendix B3). All other statistical areas are managed in accordance with each prescribed management plan.*

## **2020 MANAGEMENT PLAN**

*During the February 2019 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the BOF made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365) by amending subsection (d) that establishes the June fishing schedule. The first commercial fishing period began on June 6 at 6:00 AM and closed at 10:00 PM on June 8, a 64-hour fishing period for set gillnet gear only. Beginning at 6:00 AM June 10, all gear types were allowed to fish for an 88-hour fishing period that ended at 10:00 PM on June 13. That fishing period was followed by a closure of 32 hours for all gear types. The commercial salmon fishery reopened for 3 more 88-hour fishing periods, followed by closures of 32 hours each. The final commercial fishing period in June ended at 10:00 PM on June 28. Additionally, the BOF added a new subsection to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365(g)) to close the waters of the Volcano Bay Section of the Southwestern District, the*

*Belkofski Bay Section of the Southwestern District, excluding those waters inside of a line between Vodapoini Point (lat 55°01.88'N, long 162°24.80'W) and Bold Cape (lat 55°01.24'N, long 162°16.40'W), and the South Central District to purse seine gear."*

These regulatory changes most likely reduced the total harvest rate of sockeye in the South Peninsula on the Black Lake and Chignik lake reporting stocks in years beginning 2013 which are quantified on Figures 4 and 5.

The relative abundance changes in recent years may also contribute to a change in stock composition in the Shumagin Is salmon fishery which in turn would reduce harvest rates. For example, since the regulation change, the inshore Bristol Bay run has averaged 55.3 million sockeye (2013-2020) compared to 42.7 million during the WASSIP years while the Chignik total run averaged 1.8 million over the same time period and averaged 1.5 million during the WASSIP years.



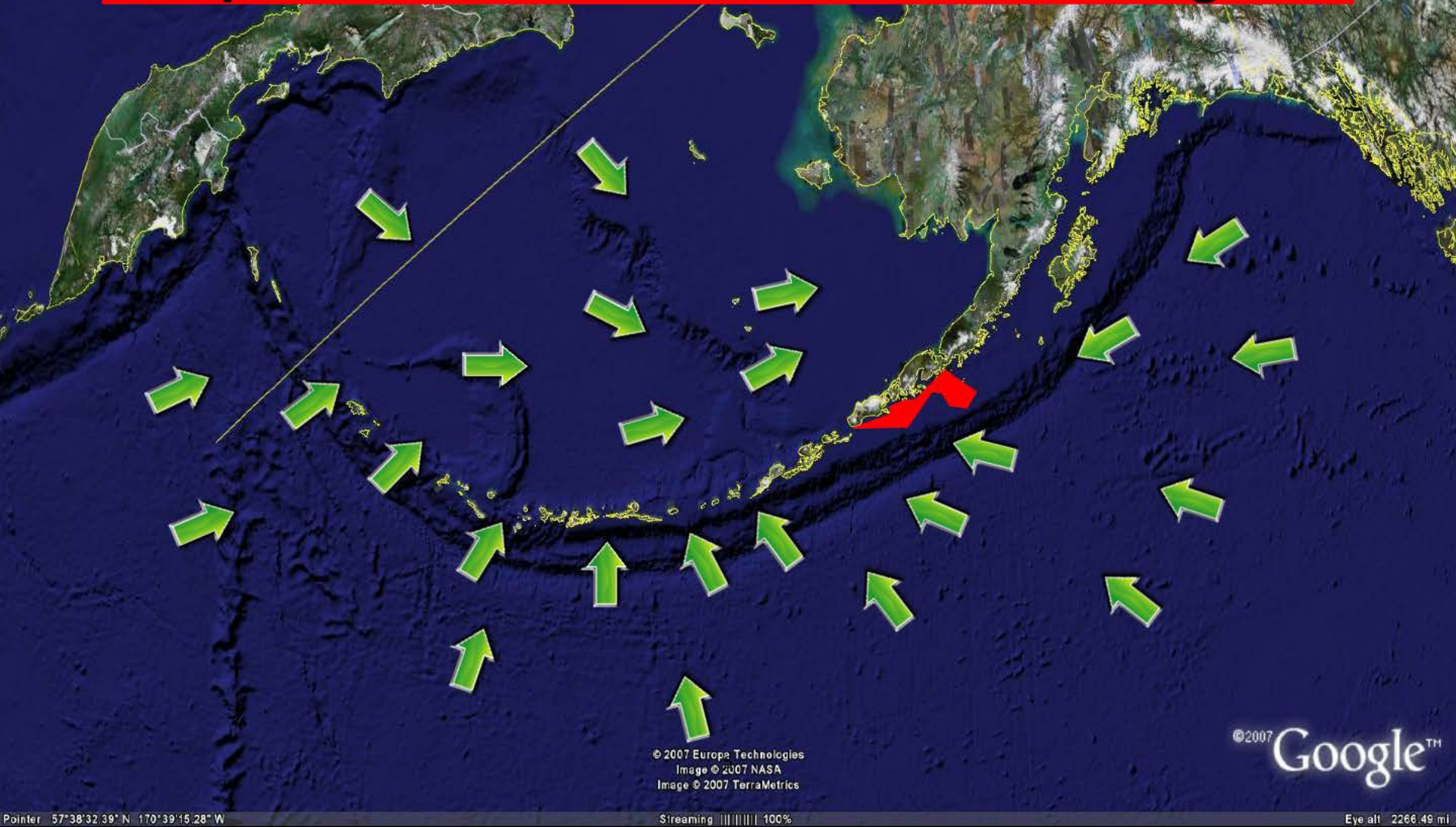


Figure 6. Due to the fact the migration occurs on a vast area of the ocean the SUSI fishery doesn't have the capability of achieving high harvest rates on a given stock



PC097  
12 of 22

**The SUSI June Fishery is small in size compared to the North Pacific and Bering Sea.**



© 2007 Europa Technologies  
Image © 2007 NASA  
Image © 2007 TerraMetrics

© 2007 Google™





## The June Fishery

Sockeye have been harvested at South Unimak and in the Shumagin Islands during the month of June for nearly a century. There's a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery is very valuable to its participants, to the Alaska Peninsula economy, and to the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past Boards have understood the value of the June fishery and have been committed to assuring us a viable sockeye harvest.

In 2004, the Board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that drastically cut our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The Board in 2004 recognized multiple problems with the prior plans – not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits – and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage Board members to review the findings prepared by the Board in 2004 (2004-229-FB).

In adopting these changes to the June fishery management plan, the key question the Board asked was whether the fishery would still perform within historical levels of harvest. The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The harvest of sockeye in the June fishery has ranged from roughly 1.95 million fish in 2017 to 660,000 in 2014, averaging 1,175,990 for the period 2010-2019.<sup>1</sup> During the same time period, the harvest of chum ranged from approximately 179,000 chum salmon in 2015 to 697,000 in 2009 and has averaged around 406,000 fish for period. These harvest levels are in the lower middle range of our historical catches for both species, and are smaller than the **error** in estimates of the size of the Bristol Bay sockeye and AYK chum runs after the season is over. Harvests of this magnitude are biologically insignificant.

The most recent season 2021 which is not included in the latest AMR produced the highest catch since at least 1979 for both sockeye and chum salmon. The SUSI June catch of sockeye was approximately 3.53 million and the catch of chum was about 1.17 million.

Nor did the 2004 plan result in any significant increase in the amount of effort. The number of permits fished remained relatively constant from prior years, and is considerably lower than the number of permits that fished during the 1980s and 1990s.

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<sup>1</sup> See South Alaska Peninsula Annual Management Report, 2020, Regional Information Report 4K21-12 (November 2021), at 64, Appendix B5.

Area M fishermen well understand the need to control their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet participates in “chum harvest pools” where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. But it must also be recognized that occasionally there will be years when the presence of chum in Area M waters is so continuous that they are hard to avoid, and that at some point, vessels need to fish if they are to maintain a reasonable sockeye harvest. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as by-catch to our harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery.

Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on a number of studies of the June fishery – including tagging; genetic stock identification (GSI), including the recent Western Alaska Salmon Stock Identification Program (WASSIP); and mark-recapture – certain conclusions have become clear:

1. Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock;
2. The chum salmon harvested in our fishery originate from a wide geographic area – Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, South-central Alaska – and only about a third are AYK summer chum;
3. Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are not even present in the June fishery; and
4. Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing. (Figure 6)
5. Chignik bound sockeye are present in June fishery harvests, however harvest rates are low. (Figure 4,5)

In sum, the June fishery has little biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting a viable fishery to be prosecuted there. Proposals seeking to further restrict the Area M fisheries are based on the myth that there is, or should be, a priority allocation for stakeholders closer to the stream of origin of salmon stocks. This attitude is in direct conflict with the position of the State of Alaska as signatory of the Pacific Salmon Treaty, which recognizes the intrinsic equity claim for fisheries near waters where salmon grow to maturity. The State vigorously maintains that there is at least as much, if not more right to harvest based on the idea of contributions to growth in contrast to



stream of origin. Within Alaska salmon are a common property resource that 'belong' to everyone, not just those nearest the stream of origin. The current June fishery management plan is working well, and data from WASSIP confirm the basis for prior Board actions and findings. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the nine-year study.

The following pages include the “*Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries*”, which provides important background information concerning the study. Which was printed in the internationally recognized NPAFC newsletter.







# Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries

By Erica Chenoweth, Eric Volk, and Bill Templin  
Alaska Department of Fish and Game (ADF&G)



Map of Alaska with inshore and marine waters included in the WASSIP study highlighted in blue and ADF&G salmon management areas.

coastal western Alaska, including state-managed marine and inshore waters on both sides of the Alaska Peninsula, Bristol Bay, the lower portions of the Yukon and Kuskokwim River drainages, Norton Sound, up around the east side of the Bering Strait to Point Hope, and Kotzebue Sound.

WASSIP's origins date back to the 1990s, when stakeholders and fishery regulators became acutely aware of the need for improved science-based information to better understand catch composition of diverse fisheries in western Alaska, so that informed decisions on allocations could be made.

**The Western Alaska Salmon Stock Identification Program (WASSIP)** is a unique collaboration among stakeholders and scientists to address long-standing questions about harvest patterns of chum and sockeye salmon in western Alaska fisheries. Born from frustration with widely divergent regulatory decisions based on limited and controversial data, WASSIP created a framework for representatives from affected stakeholders in western Alaska to collectively design a scientific study to address critical information gaps in a highly contentious commercial and subsistence fishing environment.

While engaged in the largest salmon genetics study ever conducted (collecting over 325,000 samples), we established a process where representatives of major regional fishery interests accepted responsibility for the design of scientific investigations that would inform regulatory decisions they must live with. Spanning more than eight years, WASSIP analyzed more than 225,000 tissues to determine stock-specific compositions, harvests, and harvest rates of sockeye and chum salmon in subsistence and commercial fisheries across a vast region of



Naknek gillnet sockeye salmon fishery in Bristol Bay. Photo credit: © ADF&G used with permission





Picking salmon from the net on the Alaska Peninsula.  
Photo credit: Gene Conservation Laboratory, Lisa Fox, ADFG

Of particular concern to chum fishermen in the Arctic, Yukon, and Kuskokwim regions and to sockeye fishermen in Bristol Bay were catches of chum and sockeye salmon in regulatory Area M, on the North and South Alaska Peninsula. It was widely assumed that fisheries in Area M were intercepting excessive levels of salmon bound for distant regions. Previous

tagging and genetic studies for sockeye and chum salmon provided some useful information, but study limitations and a lack of comprehensive sampling hindered their utility.

Following the Area M Alaska Board of Fisheries meeting in 2004, tensions boiled over leading to pointed discussions among ADFG leadership and stakeholders to envision the kind of study that would provide the necessary fishery-specific information to understand stock-specific impacts from the many fisheries in western Alaska. Recent advances in genetic stock identification (GSI) provided a practical method for wide-scale salmon stock discrimination and the means to effectively address these questions.

In 2004, the ADFG and affected stakeholders began drafting proposals to rally financial resources and create a study design. In 2005, the federal government pledged financial support if a unified study design was agreed upon by all stakeholders. For more than a year, the fledgling group embarked on intense discussions to gain consensus on a plan. In 2006, a second advisory panel meeting was held, where elements of a draft Memorandum of Understanding (MOU) were discussed at length, and eighteen months later, an acceptable MOU was signed and adopted.



Subsistence users around Alaska.  
Photo credit: © ADFG used with permission





Advisory Panel representatives and ADFG staff at meeting in Anchorage, Alaska, fall 2012 (left). WASSIP results and presentation methods are discussed (right).  
Photo credits: Gene Conservation Laboratory, ADFG.

The challenge of reaching these agreements among many stakeholders with widely divergent interests should not be minimized. Signatories to WASSIP represent major fisheries interests and stakeholder groups, including local governments, corporations, and fishermen associations. The 10 signatory groups other than ADFG were Bristol Bay Native Association, Bering Sea Fishermen's Association, Yukon River Drainage Fisheries Association, Lake and Peninsula Borough, Association of Village Council Presidents, Kawerak Incorporated, Tanana Chiefs Conference, Aleut Corporation, Aleutians East Borough, and Concerned Area M Fishermen. WASSIP began with federal funding, which provided for just a single year of sampling in 2006.

The hard-won WASSIP MOU forms the foundation and framework of the program. It established the tripartite structure for WASSIP consisting of the (1) Advisory Panel (11 signatories, including Alaska Department of Fish and Game), (2) ADFG (department staff in genetics, stock assessment, and biometrics), and

(3) an expert technical committee.

Advisory Panel members reviewed and approved elements of the study plan and, in addition, played a direct and tangible role in the development of specific technical and programmatic components. ADFG technical staff was responsible for all analyses and reporting.

The technical committee was composed of four internationally recognized scientists in the fields of genetics, population dynamics, biometrics, and salmon life history and migration. These were Drs. Milo Adkison from the University of Alaska, Robin Waples from NOAA Fisheries, and Tom Quinn and Bruce Weir from the University of Washington. They provided an independent source of critical technical insight into all methods and analyses that are the foundation of WASSIP data.

It was further stipulated that samples would be analyzed as a complete set; no analyses would begin until three years of samples had been collected and approved for both species; and no reporting of results would occur until all analyses for both species were complete. All project decisions were made by consensus; all meetings were open to the public; and all information was publically available.

An important expectation for WASSIP stakeholders was increasing public trust through an interactive process and ensuring that results were disseminated in an open and understandable way. In addition to public meetings, the primary mechanism for disseminating information was the [WASSIP website](#), where agendas, meeting minutes, and documents (including final reports, data files, posters, and maps) were posted and remain accessible today. A highlight of the website is the availability of technical documents, which trace the development of methods and techniques between ADFG, the Advisory Panel, and the expert technical committee, both in their original white paper form and in a more complete and readily citable report form.



Spring 2012 WASSIP Advisory Panel meeting.  
Photo credit: Gene Conservation Laboratory, ADFG





Pelvic fin held out to show the axillary process on ocean bright salmon. The tissue is non-lethally sampled for genetic analysis.  
Photo credit: © ADFG used with permission



Dockside genetics sampling.  
Photo credit: © ADFG used with permission

From 2007 to 2009, WASSIP was fully funded by the State of Alaska and continued comprehensive sampling for both species. Agreement was reached on various technical components of the study, such as selection and development of genetic markers to increase stock resolution, methods to build the genetic baselines (the spawning stocks sampled to characterize genetic stock structure), and the best way to report results. For example, while Asian stocks of chum salmon are harvested in some western Alaska fisheries and Asian populations were included in the genetic baseline, the main concern of WASSIP was to describe the harvest of local western Alaska stocks. Therefore all Asian populations were reported as a single stock. Likewise, all North American populations from east of Kodiak Island were reported as a single stock. Further resolution is possible, but the decision was made to gain the greatest precision and accuracy for stocks important to WASSIP. For sockeye salmon, the scope of the baseline was even more specific and included only one group outside of the WASSIP area, described simply as "East of WASSIP".

Another early and important decision was to use single nucleotide polymorphisms (SNPs) as the marker type for the project due to the potential for high throughput analysis. ADFG was able to draw on an archive of tissues, DNA, and genetic markers available from throughout the ranges of both species made possible by collaborative research among U.S. scientists and scientists from Korea, Japan, Russia, and Canada. As an example, the collaboration made possible through PacSNP allowed for the development of the initial range-wide SNP baseline for chum salmon (See Seeb et al. 2008, Templin et al. 2012, Templin et al. 2014, and Seeb et al. 2011).

The main goal of WASSIP was to better understand the impact of all western Alaska fisheries on each of the two species and stocks of interest. In order to meet this overarching goal, genetic baselines were expanded, commercial and subsistence fisheries were sampled over several years to characterize temporal and spatial variability in stock contributions, and methods were explored and refined to maximize our capacity for stock discrimination in these fisheries. Meeting these lofty goals required an unprecedented level of effort on the part of all WASSIP



Gene Conservation Laboratory members often had to utilize helicopter transportation for baseline sampling.  
Photo credit: © ADFG used with permission





Dockside genetics sampling (upper left), sampling chum salmon (upper right), collecting fishery samples into a deep-well plate (lower left), and collecting baseline samples into a bulk sample bottle (lower right).  
Photo credit: Gene Conservation Laboratory, ADFG

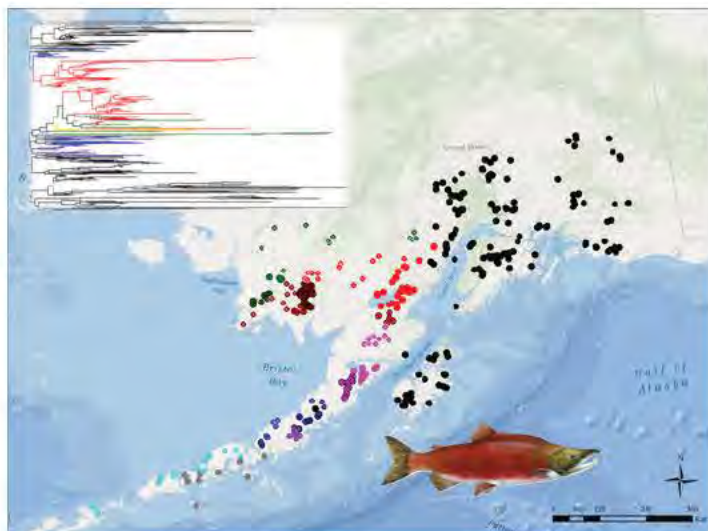
participants.

Complete WASSIP results are contained in nine reports. The foundation for the study is presented in the first five reports documenting fishery sampling, establishing genetic baselines for each species, and estimating stock-specific escapements for each species. Results of mixed-stock fishery analyses are contained in two reports for each species: one documenting estimated stock compositions from genetic analyses and one providing estimates of stock-specific harvest numbers and harvest rates for chum and sockeye salmon in WASSIP fisheries. The last two reports for each species are closely connected. The stock composition of fishery catches shows the percentage of harvest represented by various stocks in WASSIP fisheries. These stock percentages were applied to the number of fish harvested in the fisheries to determine stock-specific harvest numbers. Stock-specific harvest numbers for each WASSIP fishery were divided by the total run for each stock to determine harvest rates. It was essential that stock composition, harvest, and harvest rate results for each species be considered together to gain a complete understanding and full context of study results. All results are accessible on the WASSIP website (see <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.reports>)

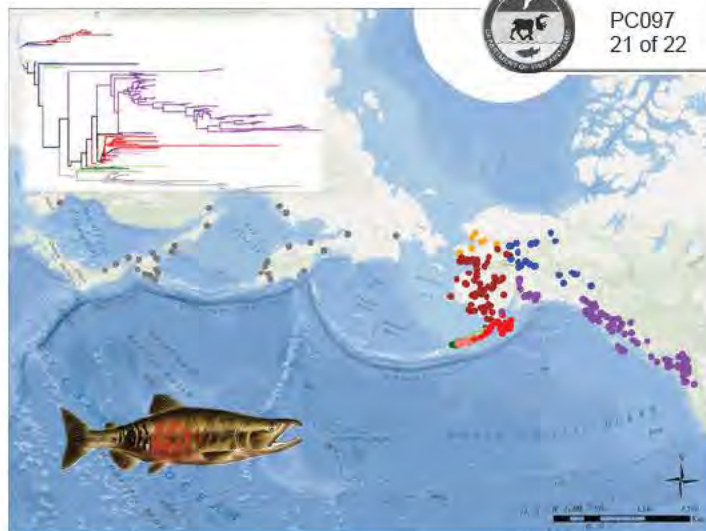


Lab staff working on extractions and genotyping.  
Photo credits: Gene Conservation Laboratory, ADFG





Sockeye salmon genetic baseline populations (39,205 sockeye salmon, 294 populations, 96 SNPs) and sockeye salmon genetic baseline structure. Genetic baselines are used to estimate the contribution of each stock to WASSIP catches.



Chum salmon genetic baseline populations (32,817 chum salmon, 310 populations, 96 SNPs) and chum salmon genetic baseline structure. Genetic baselines are used to estimate the contribution of each stock to WASSIP catches.

While results from the study cannot address all questions surrounding fishery impacts on chum and sockeye salmon stocks across this vast geography, WASSIP provided opportunity for representatives of major regional fishery interests to collaborate with technical experts on design of scientific studies to inform regulatory decision making.

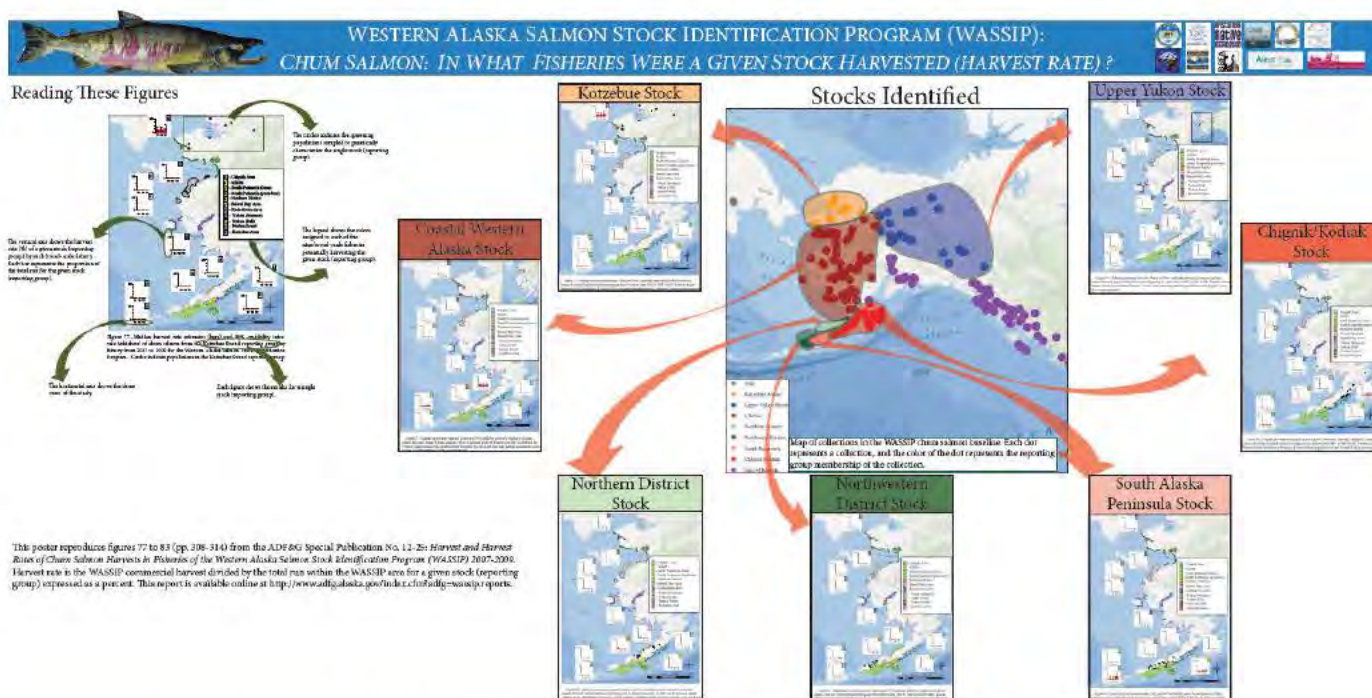
The results of this large and comprehensive effort will serve as a springboard for continued collaborative investigations on these species both within Alaska and throughout the Pacific Rim, thereby increasing our knowledge of population structure, migratory behavior,

stock-specific harvests, and post-glacial colonization.

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Example of posters available online: <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.posters>

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Seeb, L.W., W.D. Templin, S. Sato, S. Abe, K. Warheit, J.Y. Park, and J.E. Seeb. 2011. [Single nucleotide polymorphisms across a species' range: implications for conservation studies of Pacific salmon](#). Molecular Ecology Resources 11 Supplement 1:195-217.

## Further Reading

WASSIP final reports and citable technical documents:  
<http://www.adfg.alaska.gov/index.cfm?adfg=wassip.reports>

Posters of results with explanations on how to read figures from WASSIP publications:  
<http://www.adfg.alaska.gov/index.cfm?adfg=wassip.posters>



**Erica Chenoweth** received her B.S. in Natural Sciences from the University of Alaska, Anchorage. She served as an intern at the Kachemak Bay Research Reserve in Homer, Alaska, specializing in

marine science education and assisted in field work on many projects. She was also a research and technology assistant on the National Science Foundation-funded Native American Science Curriculum project. Since 2012 Erica has been a Fishery Biologist at the Gene Conservation Laboratory of the Alaska Department of Fish and Game, providing laboratory and publications support on a wide range of projects. She particularly enjoys collaborating with authors locally and statewide to help make the WASSIP publications a success and creating public outreach material on the program. Passionate about science literacy, Erica loves the great outdoors and historical research.



**Eric Volk** received his M.S. in fisheries from the University of Washington and his B.A.

in Biology from Cornell University. He has over 30 years of experience working with salmon for the states of Washington and Oregon and has been the chief salmon fisheries scientist with the Alaska Department of Fish and Game since 2008. His research interests have centered on determining stock identification and life history variability in salmonids and lamprey using otolith and statolith microchemical and microstructural techniques. Eric's work includes publications regarding pioneering methods leading to the common practice of thermal marking used to identify different hatchery salmon stocks today. Eric is a member of the NPAFC Working Group on Stock Assessment.



**Bill Templin** received his Master's Degree in Quantitative Fisheries Science at the University of Alaska Fairbanks modeling the interaction of migration, harvest, and escapement in a pink salmon

fishery in Prince William Sound, Alaska. He has since worked in the field of quantitative and applied fish genetics for 20 years, the last seven as laboratory director and principal geneticist for the Alaska Department of Fish and Game. The laboratory investigates population structure, stock composition of fishery harvests, parentage of hatchery individuals and migratory behaviors. Bill has also been involved in developing large-scale baseline datasets based on allozyme, microsatellite, and single nucleotide polymorphism markers at multiple scales. He is a member of the NPAFC Working Group on Stock Identification. Outside of work, Bill enjoys hiking, hunting, discussing philosophy and theology over beer, martial arts, and riding motorcycles with his wife.





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February 15, 2022

Dear Board of Fish,

I have been a guide on the Kenai for 8 years now, and even in my short time on the river, I have noticed a noticeable decline in numbers, as well as size of our Kings. Something needs to be done to help our states most iconic fish, and lowering the escapement goal to allow more commercial harvest of sockeye is not the answer. This decision would impact more kings than the run can afford. The state should be doing everything in their power to put more kings on the gravel

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.

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.

Connor Murphy  
38745 Self St  
Sterling



Dear Members of the Board,

Our membership has long had an interest in the PWS spot prawn pot fishery and feels modern management of the fishery has been limiting our ability to participate in this fishery without justification. It's important to point out that the current management strategy, which has only been in effect since 2010, was a drastic departure from the historical fishery in season timing and gear restrictions. These changes in the management strategy have turned what was once a small profitable shoulder season fishery for many local commercial fishermen into a glorified sport fishery that is largely participated in by hobbyists with little or no interest in making a profit. Since the implementation of the current management strategy management has used its ability to adjust pot limits and opener lengths to exclude participation by Cordovan fishermen despite our protests. We ask the board to question whether the current management is in line with the department's stated goal to "optimize economic benefits from fish and wildlife resources".

#### **Proposal #237 Support**

Current reporting rate and accuracy is unacceptably low in this fishery especially considering the ghl is often exceeded. I would encourage the Board to require some sort of timely reporting so that this fishery can be more actively managed to prevent overharvest.

#### **Proposal #238 Oppose**

#### **Proposal #239 Modify**

Pot limits per vessel has long been used in commercial, subsistence, and sport harvest in Alaska to limit harvest potential. Recently Shrimp fishermen in PWS have started exploiting this "spare pot" loophole in order to drastically increase the number of pots fished per vessel. Now vessels are regularly heading out with multiple permit holders aboard and multiple limits of shrimp pots which they call "spares". Once the vessel sets one permit holder's limit worth of shrimp pots they simply add marked buoys to their "spare pots" for the next permit holder on board and go set those. In this way they are capable of fishing far more gear per boat than was ever intended by the regulations.

We encourage the board to take this opportunity to clarify the regulation which already clearly states a maximum of 5 pots per vessel to include any spare pots aboard the vessel.





### **Proposal #240,#242,#246 Support**

The current spot prawn management plan does not differentiate sport, personal use and subsistence harvest in the TAH. Allowing sport and personal use harvest when the population is depressed below that which could support a commercial fishery should not be allowed as these user groups have the same priority under law. Noncommercial user group is the largest user of spot prawns in PWS and is often incapable of being managed to not exceed their GHL. Proposal 240 would be the preferred solution.

### **Proposal #247 support**

The first gear limit set on this fishery was in 1990 with a limit of 150 pots. When the fishery reopened in 2010 the current regulation with a limit of 100 pots was put into place. However, this modern harvest strategy also gave the department the ability to set pot limits yearly based on the number of registered participants. This was a mistake, adjusting gear limits based on registered participants is not a common practice in other Alaskan commercial fisheries and has no reason to be done here. Knowing a set number of pots gives some consistency to the daily harvest a fisherman can expect to achieve every year they participate. By lowering pot limits the department decreases the daily harvest potential of participants and therefore increases the cost to participate in this fishery. The department is incentivised to give participants the smallest number of pots they can as it slows the pace of the fishery and reduces participation thereby making management easier. The board should set a minimum gear limit like it has done in nearly every other fishery in Alaska.

The 2021 PWS Spot prawn fishery was a perfect example of the department's unwillingness to liberalize pot limits. In 2021 the fishery was open for a total of 112 days between April 15th and August 28th. The fishery opened with a 30 pot limit similar to the previous years but the CPUE and effort was much lower than previous years. Despite this slow start the department still had a 12 day closure from April 28th to May 10th and kept a pot limit of 30 pots for the second opener until May 15th. After May 15th they raised the limit to 40 pots for the rest of the season. The department ignored the existing management plan's requirement to set pot limits based on participation, cpue and ghl. This arbitrarily low pot limit resulted in a 124 day long season to harvest a 70,000lb ghl compared to 2020 when a 68,100lb ghl was harvested in 24 days.





According to CFEC the average gross earning per active permit for 2020 was \$5,466 in 2019 it was \$6,565. These would be fine averages if season length was 1-2 weeks. During a one week season the average participant could turn a profit. However, managing the season to last from 24 days in 2020 to 124 days in 2021 makes the ability of the average participant to pay expenses extremely unlikely.

Southeast Alaska manages spot prawn districts with individual GHL's comparable to PWS and does so in a much more efficient manner. District 1 and District 2 in southeast are both comparable to PWS in that they have approximately 50,000lb GHLs. These areas are managed with participants allowed to use 140 pots and season length is usually around 10 days.

#### **Proposal 248 Support**

This fishery has been underutilized for at least the last 20 years with a good portion of the ghl going unharvested every year due to low participation. An earlier start date would make rigging up and going before salmon season more viable for participants.

#### **Proposal 250 Support**

Before the 2010 management plan this fishery had always opened earlier than April 15th the most recent opening date before the closure in 1990 was March 15th. We are simply asking for the more historic fishing season dates. Gear conflict with noncommercial users is becoming more and more of an issue in the commercial spot prawn fishery and an earlier start date would allow the commercial fleet to harvest their ghl before many sport boats start fishing in the spring.

For fishermen that fish the Copper River the spring shrimp season is a good way to diversify and make a little money before the Copper opens on May 15th. The later opening date of April 15th gives them a smaller window to participate and then switch over to salmon fishing. To make matters worse the department has also begun making a habit in the spot prawn fishery of having a long closure during the last week of April, first week of May which results in an additional reduction of fishing opportunity for these participants.

In 2021 the fishery opened April 15th but then had a 12 day closure from April 28th to May 10th before reopening until August 28th. This was done with no justification as the majority of the GHL was still remaining and the harvest rate was slow. That





excessive closure eliminated any fisherman who also fishes the Copper river's ability to participate in the second opening and unnecessarily increased the expenses for shrimp fisherman and processors who had to leave their boat and crew idle mid season.

### **Proposal 251 Oppose**

We are in support of most of this proposal except for Section F which would make it illegal to fish a floating processor in these shrimp fisheries. Small scale floating processors have been harvesting in this fishery since it reopened in 2010 and should not be excluded. The department claims a similar regulation exists for the shrimp fishery in Registration Area A which is true. However, registration A put that regulation in place in the 1990s due to their inability to track harvest on floating processors in a timely fashion. This is not the case in modern PWS with plenty of cell phone coverage. Cell and Sat phones make daily reporting easy and with that reporting there is no reason to ban floating processors from participating.

The best quality and highest value shrimp are frozen at sea and allowing floating processors to work with other fishermen to freeze their own catch as well as others only benefits this fishery. The harvest volume in this fishery is so low it is extremely hard to make freezing at sea viable especially if you ban the ability to freeze multiple permit holders catch on one boat. Banning floating processors from being able to also participate in this fishery will do nothing to protect the species; it will only make an already economically difficult fishery even more so.

### **Proposal 252 support**

Allowing catcher boats to also act as tenders is allowed with salmon under the transporter regulation and that should be mirrored in shrimp fisheries. Fresh shrimp needs to be frozen or sold within three days of harvest. It makes no sense for 50 shrimp boats to all run back and forth to town every three days when they could simply consolidate their catch on one boat. The low volume in these fishery's make it difficult to afford a dedicated tender vessel and consequently this would greatly increase the profitability of this fishery. This would also increase the ability for processors from further ports such as Cordova to compete in the market which could drive prices paid to fishermen up.

### **Proposal 253 Support**

This bycatch regulation needs to be changed as it is foolish to be required to throw shrimp overboard as deadloss. The department's own data shows no harvest of spot





shrimp in this fishery since 1996 yet they oppose this proposal due to it increasing spot harvest? Currently a fisherman, if they wanted to, could throw every pink shrimp they catch overboard and it would not contribute to their bycatch allowance. The idea that fishermen currently keep low value pink shrimp and throw spot prawns over is ludicrous. This regulation will in no way increase spot harvest; it will simply help stop the wanton waste of pink shrimp by not requiring them to be discarded dead whenever they are harvested in excess of 20%.

#### **Proposal 254 Support**

The department has the ability to put observers on shrimp trawl boats and has in the past. The department currently bottom trawls this area frequently to do tanner crab surveys. If it's ok for the department to trawl this area targeting tanner crab why shouldn't commercial fisherman be allowed to trawl it to target shrimp as has been done in the past? If evidence of tanner crab mortality was to result from this small scale fishery we would of course ask for it's closure. There is little effort in the shrimp trawl fishery and an expansion of area closer to Cordova may encourage participation.



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March 09, 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.

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.

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.

Corey Jellison



Submitted By  
Corey Roche  
Submitted On  
2/8/2022 6:20:51 AM  
Aff at on

Phone  
9072297106

Ema  
[Akroche88@yahoo.com](mailto:Akroche88@yahoo.com)

Address  
8026 queen V ctor a dr ve  
Anchorage, A aska 99518

I strong y oppose proposa #283. It does not support preservat on of ate run k ng sa mon. It benef ts on y one user group, wh e ower ng object ves. Cons der ng the ast decade of k ng sa mon spawn ng numbers, now s not the r ght t me for non conservat ve measures.

Regards,

Corey Roche



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March 07, 2022

Dear Board of Fish,

I have been working on the Kenai river for 7 years now, and have been guiding for the last 3. In my time on the Kenai, I have personally seen the decline in big fish year after year. As a guide and a conservation minded angler I understand the importance of proper management. This river, and the king salmon that swim it are my livelihood. Seeing the continued mismanagement of this resource is extremely disheartening.

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.

Cory Felde

Helena  
59602





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February 26, 2022

Dear Board of Fish,

I was a commercial fisherman for nearly 20 years, mostly Kodiak swine and halibut but also fished the bay for a season. I live at the mouth of the kenai and the roar of gillnettrrs coming and going in summer brings back memories! I am writing to ask that you vote down the proposal to allow more liberal commercial fishing for kings in any way. This unique fishery needs more, not less protection. We know what happens when fish numbers reach a critical low... please please don't allow it. Greed is a dangerous commodity, protect the kenai my friends!

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.

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.

Craig Baker

Kenai  
99611



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February 26, 2022

Dear Board of Fish,

I'm an Englishman living in NY. Each year I make a sport fishing trip to the Kenai, I spent in the range of \$10k.

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.

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.

Craig Smith



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February 20, 2022

Dear Board of Fish,

I

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.

Cy Porwall

Brained  
56401



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February 25, 2022

Dear Board of Fish,

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.

Cyndie Fox  
Anchorage  
99507





Submitted By  
Dae Baard  
Submitted On  
2/13/2022 6:08:31 PM  
Affiliation  
Fish ng guide

Phone  
5035519772  
Email  
[dae052@gmail.com](mailto:dae052@gmail.com)

Address  
2244 SW McGinnis Ave.  
Troutdale, Oregon 97060

I am writing to vehemently oppose Proposal 283. Once again lowering the bar to allow the take of more Kings commercially is absolutely the wrong thing to do, especially in this period of low returns which is an extension of a long existing trend of diminishing returns of the Kings. This proposal needs to be dropped.



Submitted By  
Dae Pedersen  
Submitted On  
3/3/2022 8:01:37 AM  
Aff at on



PC108  
1 of 1

Here are the reasons why I am against proposal 282

Our communities and people depend on fishing to survive, we all know that the Chignik also need fisheries to survive too. But to close down the whole Alaska Peninsula for a lake system that has, according to Chignik Aquaculture Association, has experienced a substantial loss of lake volume doesn't seem like the prudent thing to do.

ADFG has all the tools they need to manage SAP fisheries and have used them when needed. From what I read the Board will have much more information about escapement goals and habitat management for Back Lake system at regular 2023 meetings.

The sockeye we caught last June were so small I would be embarrassed to call them a Chignik fish. With Bristol Bay being run last year, that was the first June we actually caught sockeye in June in a long time.

Chignik is forecast to meet escapement goals this coming summer. We should not do anything drastic until we see what ADFG has in mind for Back Lake before shutting more areas down. We should wait for regular scheduled cycle meeting for area M and area L.

Thank you,

Dae Pedersen .



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March 08, 2022

Dear Board of Fish,

The protection of the Kenai King Salmon should be of utmost priority not only in protecting the species, but helping it recover. This is a world renowned resource that can only be found here.

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.

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.

Dan Graham

Wasilla  
99654



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February 18, 2022

Dear Board of Fish,

The kings are pretty much gone, STOP overfishing Kings and STOP by catch

you might see a calif address but Ive been fishing the kenai for 19 years.

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.

Dan Periat  
pescadero  
94060



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February 27, 2022

Dear Board of Fish,

I've lived in Anchorage for 40 years and make weekly trips to fish the Kenai from May 7th to September 7th every year! I have witnessed the decline of the King Salmon fishery over the years and am **STRONGLY OPPOSED** to Proposal #283 which would increase the risk of yet additional incidental by-catch of Kings by Commercial fishing! **PLEASE DO NOT RISK ANY MORE HARM TO THIS TREASURED FISHERY!!!**  
DB

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.

Dana Bertolini

Anchorage  
99516-1425



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February 19, 2022

Dear Board of Fish,

The Board of Fisheries has been a failure for the last three or four decades. SAVE the Kenai!!!!!!  
Shut it down for at least 5 years.

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.

Daniel Adams

Kasilof  
99610



To whom it may concern,

I am a young fisherman and subsistence user who lives in the Chignik Area and I support Proposal 282 because I believe it's a step forward in conserving and protecting our salmon runs that these communities so heavily rely on. I think ADF&G and the Board of Fisheries need to start taking more actions like this. Not only in the area that I live in but in all areas that are struggling to catch fish for food in these rough times. Stop putting politics over the science and common sense that could potentially reverse many years of damage done to our state's resources and communities. I appreciate you taking time to read my letter.

Thank you

Daniel C Grunert





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March 10, 2022

Dear Board of Fish,

I live in Anchorage and enjoy the abundant fishing resources offered to residents for sports fishing. It is imperative that Alaska fisheries is represented in a balanced manner between residential and commercial fisherman.

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.

Daniel McCue

Anchorage  
99507



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February 15, 2022

Dear Board of Fish,

I work at Home Depot. Fish the Kenai and the Swanson river's most of the summer. My favorite fish to eat is the king salmon but have not kept one in five years just to let them breed.

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.

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 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.

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.

Daniel Meyer

Kenai  
99611



Submitted By  
Dane Norma  
Submitted On  
3/11/2022 6:04:17 PM  
Affiliation

Phone  
9073500885  
Email  
[akdanma79@gmail.com](mailto:akdanma79@gmail.com)  
Address  
36045 Reef Dr  
Kena, Alaska 99611

Board members,

I support proposal 283. The ESSN fishery has shouldered more than its share of the burden of conservation due to low king salmon abundance. This proposal allows for a limited and targeted fishery to harvest surplus sockeye salmon which significantly reducing the catch rate of king salmon. This proposal allows for an additional tool for the managers to use to allow for some harvest opportunity when the management to biological goals.



Submitted By  
Darius Kasprzak  
Submitted On  
3/11/2022 5:55:50 PM  
Affidavit on

March 11, 2022

BOF Comments

Boards Support Section

PO Box 115526

Juneau, AK 99811

### **Proposals 264 & 265- OPPOSE**

### **Proposals 266, 268, & 270- SUPPORT**

Honorable Charles Carson-Van Dort and BOF members,

I'm Darius Kasprzak, of home port Kodiak. I own and operate the 46' jig vessel F/V Marona, and hold a Kodiak area Tanner Board permit which I have utilized on multiple vessels.

I am opposed to proposals 264 & 265- I believe that amending the 14 day Dungeness gear operation period would lead to more "mudded down" partially buried and lost pots.. hence more ghost fishing, and add tons of more lost gear on the seafloor to entangle the anchor fukes, of a vessel.

I support proposal 266; **as regarding the 750 pot limit portion of said proposal-** For the past several decades, I have commercially jigged rockfish and Pacific cod in the Kodiak Archipelago. Over the past several summers, the amount of Dungeness gear crowding nearshore anchoring locations (especially on the East side of Kodiak) has become downright hazardous.

After a hard day of fishing, it has become challenging to thread my way through Dungeness gear and anchor for the night. Almost every bay and cove with good hold good bottom on the East side, has become absolutely saturated with Dungeness gear.

For instance, to seek refuge from strong southwesterly winds at Kodiak Bay, I often have a difficult time now finding enough space between pots, to anchor with adequate anchor line scope and angle (so as not to drag anchor in heavy wind). This is with a heavy anchor and chain, and a powerful hydraulic windlass to assist.

Recreational vessels and sailboats with hand or electric windlasses may need to deploy more anchor line (and thus more scope and angle) to compensate for lighter anchors.. which results in a larger swinging radius and more space required between pot gear- in order to minimize entanglement risk with vessel prows, and underwater hydroprotrusions.

A scope and angle of approximately 5 to 1 is considered customary for the safe anchoring of most vessels in normal conditions; therefore a swinging radius of at least about 5 times water depth (plus settling/ maneuvering margin) is necessary for safe anchoring between pot gear. The availability of spacing between Dungeness pot gear, is getting scarcer every season, in the most important "bottle" anchoring sanctuaries on the East side.

**I wish to state ADAMANTLY that safe, near shore anchoring locations are a resource to be shared, enjoyed, and depended on**



by all Mariner stakeholders and their vessels operating in the Kodiak Archipelago- not just crab fishers.



PC117  
2 of 2

**I consider a 750 Dungeness pot limit to be a satisfactory proposal- to address the burgeoning (Dungeness gear) congestion problem around Kodiak Island.**

I support Proposa 268- I believe that the current tanner Ba rd harvest strategy, is ready to be updated.

I support proposa 270- as a Kodiak area tanner Ba rd permit holder/ harvester, I am proud of the sustainability potential of this fishery when prosecuted with the current 20 pot maximum. I believe that the Kodiak area fleet has adequately demonstrated its catching power with a 20 pot limit, and I prefer to fish at that same limit, even in the event of a higher than 2 million pound GHL.

Thank you for considering my comments!

- Darus Kasprzak



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February 17, 2022

Dear Board of Fish,

I live in Anchorage and my folks have a place on the Kenai River that we have used for over 30 years. I have done a lot of Kenai King fishing over those years and am seriously concerned about the run being wiped out. I am more than happy to give up the ability to fish for Kings on the Kenai in order to preserve them long into the future.

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.

Daryl Romo



Submitted By  
Dave Lowery  
Submitted On  
2/15/2022 12:38:03 PM  
Affiliation

Phone  
907-953-5202  
Email  
[lowerydb@yahoo.com](mailto:lowerydb@yahoo.com)  
Address  
34715 Keystone drive  
Seldovia, Alaska 99669

I would like to see the board of fish to vote NO On proposition 283.  
The Escapement needs to be increased not reduced.



Submitted By  
Dave Maternowski  
Submitted On  
2/23/2022 4:31:13 PM  
Affiliation

I write this comment in regards to Prop 283, which calls for a new tool for fisheries managers to cap take on harvest of excess sockeye in Upper Cook Inlet. As a conservation minded resident and someone whose livelihood is centered around productive Kena sport fisheries, I am compelled to encourage the Board to vote 'no' on prop 283 and support regulations that are fully dedicated to the overall health of Kena king salmon.

If I read the proposal correctly, 13,500 kings would have to escape before this new tool could be used, putting setnetters out to harvest sockeye, provided the Kena and Kasof runs can support it. **I would argue that the opener for setnetters should not be available until the bottom end of the OEG, or 15,000 late run kings have escaped.**

This would still offer another tool in the toolbox for managers to use, and help harvest excess sockeye after the king and sockeye runs, and still allow for a more conservative escapement number.

I urge the Board to vote no, unless the proposal is changed to account for the passage of 15,000 kings past the mile 14 sonar before any openers are granted to setnetters provided the other criteria is met.



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March 12, 2022

Dear Board of Fish,

i am against Proposal 283, don't mismanage our fisheries!

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.

Dave Zerda





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February 25, 2022

Dear Board of Fish,

I live in Anchorage. My Grand parents have had a home stead along the Kenai River since the late 60's. We drive the funny river road ever single summer to go fishing with our family.

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.

David Chadwick

Anchorage  
99504



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March 08, 2022

Dear Board of Fish,

Kenai has great fishing and the Kings are not the numbers I'd like to see.

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.

David Datteri

Fort Bridger  
82933



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March 12, 2022

Dear Board of Fish,

I have commercial fished and am a current guide on the Kenai River. With the economic value of sport fishing and the subsistence value of fish to local residents we should be talking about doing away with set nets in Cook Inlet, but instead you are talking about reducing the escapement of king salmon into the Kenai river. That is the craziest idea I have heard in many years. If your goal is to kill the king salmon run in the Kenai river then lowering the escapement goal. You should consider raising the goal.

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.

David Goggia

Kenai  
99611



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February 17, 2022

Dear Board of Fish,

I live in Whittier and have lived in Alaska for close to 50 years. During that time I've fished in many places in the State of Alaska and have operated a charter business in Prince William Sound. Responsible management of our fisheries have, and continue to be, a concern to me. Lowering the escapement threshold is the wrong proposal...at the wrong time! Please don't pass Proposal 283.

Thanks in advance,  
Dave Goldstein  
Whittier, Alaska

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.

David Goldstein

Whittier  
99693



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February 16, 2022

Dear Board of Fish,

46 year resident, fish the Kenai. If we keep on this path, we are going to end up with no salmon in Cook Inlet period.

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.

David Hubbard

Anchorage  
99517



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February 24, 2022

Dear Board of Fish,

I don't think that the Kenai river king salmon should even be tampered with from all fishing, sports fishing, commercial fishing and subsistence harvesting. They have been declining for years now and once they are gone, they are gone for good! Sure there is ways of stocking king salmon but they are nothing like wild. With catch and release that has been happening just shows that the might buck takes precedence over protecting wild stocks and when I have brought up problems with catch and release, I have had some show me the data proving that but I tell them my eyes are enough proof on seeing kings played to the point that they get hooked again to just let someone pull them in and of course, some will also have to take the king out for pictures. Not only that, some play fish way too long and when they are turning on their sides before being landed is not a good thing at all.

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.

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.

David Johnson

Anchorage  
99504





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February 16, 2022

Dear Board of Fish,

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.

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.

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.

David Kuper

Big Lake  
99652



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February 24, 2022

Dear Board of Fish,

I live in Washington state. I have been coming to Alaska for the last decade to fish and hunt. I follow the fish counts closely and clearly see the difference when the commercial fishing is active. last year was more balanced and would like to see it continued. I strongly oppose proposal 283.

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.

David Lindenmuth

Lincoln  
99147



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February 16, 2022

Dear Board of Fish,

I live on the Kenai River in Cooper Landing. The steady decline of our world-famous king salmon population is very troubling. Please do all you can to protect these amazing fish and our 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.

David Lisi



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February 17, 2022

Dear Board of Fish,

I have fished and recreated on the Kenai River for over 50 years. In the past I have also guided for Kings and Silvers for many years. Due to poor return numbers and my personal choice I haven't fished a single day for Kings in the last 8 years.

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.

David Pearce

Anchorage  
99515





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February 27, 2022

Dear Board of Fish,

I currently live in South Carolina, but lived in Florida for more than 40 years. I have seen the result of uncontrolled commercial fishing has done to the fish populations there. I believe the fish populations MUST be managed in a responsible manor to maintain a healthy fishery for generations to come.

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.

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.

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.

David Peterson

Boiling Springs  
29316



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March 08, 2022

Dear Board of Fish,

Living up in Willow. Fish the rivers in this area as well as the kenai and Russian

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 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.

David Rochlen





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February 17, 2022

Dear Board of Fish,

My name is David Szott. I head a group of 10 guys from NJ that travel every year to fish Alaska. We have come to love, respect and cherish the incredible fishery.

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 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.

David Szott

Morristown  
07960



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February 22, 2022

Dear Board of Fish,

My wife and I have a home in Soldotna and spend all summer fishing the Kenai River. We have friends and family that come up from the lower 48 to enjoy all that the area has to offer. Fishing the Kenai is at the top of everyone's list.

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.

David Thiede

EAGLE RIVER  
99577



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February 16, 2022

Dear Board of Fish,

Like most Alaskans I cherish the great Alaska wilderness and want it to continue to thrive. Fortunately the Alaska Constitution requires us to protect our natural resources by saying, "Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses. But we have failed to protect the king salmon and it is being rapidly depleted.

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.

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.

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.

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David Vought

Sterling  
99672



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February 19, 2022

Dear Board of Fish,

Vote no. The river needs to heal

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.

David Zaboroskie

Soldotna  
99669





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March 04, 2022

Dear Board of Fish,

I have lived in Chugiak and Willow for 44 years. I believe in a fair sharing of Alaska's resources, including fish. EVERYONE knows that the Kenai Kings and the Susitna River and tributary kings are in trouble. EVERYONE needs to share in cutting back not only the catching directly of kings in these watersheds, but the incidental catching of kings as a bycatch of reds. I have many friends that are commercial fishermen and all of them feel the same way. The future salmon runs depend on EVERYONE and all groups cutting back on not only the catch but the bycatch of king salmon. Don't kill the Holden goose. Thank you for reading and hearing this message.

Sincerely,  
Dean S Vogt  
Chugiak

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.

Dean Vogt

Chugiak  
99567





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March 09, 2022

Dear Board of Fish,

Living in Sterling, fish is a major food resource for our family. It is important for us to be able to have access to this resource on our own. We would struggle to purchase commercially harvested fish. Alaska resources for Alaskans.

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.

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.

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.

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Debbie Eckhardt

Sterling  
99672



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March 03, 2022

Dear Board of Fish,

We haven't made escapement goals in years and we are losing our king salmon! Lowering the goal is not the answer :-(

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.

Debbie Imhof

Wasilla  
99687



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February 17, 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.

Deborah Franklin

Rhineland  
54501



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February 24, 2022

Dear Board of Fish,

I live in Soldotna Alaska and have fished the Kenai River for king salmon since 1989. It is upsetting to see the once great fishery in the shape it has been for the last several years. We need to do whatever it takes to get it back to a sustainable fishery. Even if it means closing king salmon fishing for several years.

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 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.

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.

Del Hoagland

Soldotna  
99669





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February 28, 2022

Dear Board of Fish,

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.

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Deloris Houger

St George  
84770





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February 28, 2022

Dear Board of Fish,

have lived in Alaska many years and have always been restricted in fishing until enough salmon got to spawning streams it is a good system and stay in effect

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.

Deloris Houger

St George  
84770



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February 27, 2022

Dear Board of Fish,

We fish the Kenai River year round, especially enjoy fishing for Kings on drift boat Mondays, I have only caught 4 kings in the last 2 years, please don't make it harder to catch a few Kings by giving more fish to the commercial nets, it's tough enough these days to get a fresh King on the BBQ.

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.

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.

Denis Hippert

Sterling  
99672



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February 24, 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.

Dennis Gease  
36701 v



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February 24, 2022

Dear Board of Fish,

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?

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.

DENNIS GEASE

KENAI  
99611



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February 15, 2022

Dear Board of Fish,

I have fished the Kenai Peninsula waters since 1968 and personally would like to see a 5 year moratorium on kings so the run can truly recover. This band aid approach does not appear to be working.

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.

Dennis Johnson

Eagle River  
99577





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February 17, 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 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.

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.

Dennis Morris

Wasilla  
99654



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February 15, 2022

Dear Board of Fish,

I'm retired, moved here from Fairbanks 5 years ago mostly for fishing opportunities. Kings have been declining for years, sport fishermen participate in king closures, commercials continue to want more kings. If we all take a break from kings, hopefully there will be a rebound of kings. It's not always about the selfish wants of the commercials, let's be fair to the resource.

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.

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?

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.

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.

Dennis Nilsen

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

I own and operate a sport fishing business on the kenai and will be entering my 14 year , this proposal has nothing to do with the benefit for improving the king salmon which ultimately is EVERYONES goal but if you research between the lines it's beneficial for Comercial fishing and ultimately hurting the king salmon further in it's road to becoming nonexistent in the future of our prestigious river. I've never been one to comment on past discussions in this matter but I have to teenagers that I'd love to think they will have a opportunity to see what a kenai king actually looks like when they become adults.

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.

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Derek Gardner

Soldotna  
99669



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February 19, 2022

Dear Board of Fish,

Stop killing our non existence kings, STOP!

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.

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.

Deryl Beckel

Sterling  
99672



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March 11, 2022

Dear Board of Fish,

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.

Destry Lind

Anchorage  
99516





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March 12, 2022

Dear Board of Fish,

Vote NO! on 283, I would if I were in your shoes.

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.

Diana Kuest

Anchorage  
99511



Don Bumpus  
P.O. Box 167  
Chignik Lagoon, AK 99565

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



January 10, 2022

Subject: **ACR 7 (Proposal 282)**

Dear Members of Alaska Board of Fisheries,

As the author of ACR 7 now listed as Proposal 282, I ask that you recognize why its passage is essential for the sustainability of the Chignik early-sockeye salmon run.

There are multiple years now where the Chignik early-run has failed to reach the lower end of the escapement goal. The consequences to Chignik are not just commercial fishery and subsistence closures for the last four years, but more poor returns in the future from those past failures to meet minimum escapements.

By current regulations, the Shumagin and Dolgoi fisheries are under no obligation to reduce the interception of Chignik-bound sockeye salmon or any other non-local stock when a stock is in jeopardy of not meeting escapement. According to ADF&G's WASSIP study, these are leading harvest areas where Chignik-bound sockeye salmon migrate.

Integrating Chignik escapement requirements into the management plan for the Shumagin and Dolgoi fisheries is one reasonable way to address the problem. Proposal 282 offers a solution, and one that is fair to Chignik and Area M.

I strongly encourage the Board to pass Proposal 282.

My best, ***Don Bumpus***



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March 07, 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?

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.

Thank you,  
Don Meilner

Don Meilner

Palmetto  
34221



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February 18, 2022

Dear Board of Fish,

The iconic State fish of the great State of Alaska, the mighty king salmon, and in particular the unique Kenai kings, need all the protection they can receive, now more than ever.

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.

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.

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.

Don Yagura

Gig Harbor  
98332



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February 19, 2022

Dear Board of Fish,

Proposal 283 is completely illogical. Lowering the Kenai Rivers king salmon escapement goal just so commercial fisheries can catch more sockeye salmon is like asking to take Cook Inlet beluga whales off the endangered species list just so commercial fisheries can catch more sockeye.

These belugas need a minimum of about 50 pounds of sockeye's per day during July to gain enough fat to survive the winter. Commercial fisheries and belugas compete for the same resource and that threatens beluga whales survival. So should we remove belugas from the endangered species list to end the conflict?

Both Cook Inlet beluga whales and Kenai King salmon cannot be genetically replaced if destroyed by commercial fisheries. Both of these illogical attempts would be absolutely unbelievably self destructive. If we were going to make a resource mistake it should be one that over restricts users and gives the resource a break, NOT the other way around.

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.

Donald Johnson

Soldotna  
99669



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February 19, 2022

Dear Board of Fish,

As an Alaskan Master Guide, I have the privilege of both using Alaskan Wildlife resources while also managing sustainability of Wildlife resources. Alaskan Fisheries are in severe decline and in my opinion based on supporting Data, The Chinook Salmon natural run in Cook Inlet is Dire. We still may have time to reverse this trend of Decline However it will not be possible without the Opposition of Proposal 283..

As a current land owner and user of Alaskan fishery resources on the Kenai river, The decline is not a problem of one specific user but all users. As it will be painful for all who are affected.. We all must sacrifice today in order to have a chance at stronger resources tomorrow..

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.

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Donald Willis

Enumclaw  
98022





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February 15, 2022

Dear Board of Fish,

Please vote NO on proposal 283. Save the famous late run king salmon. Stop the greed and save the Species. The early run of king salmon has already been destroyed all for \$\$\$\$\$. Be responsible.

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.

Donna Kessler

Anchorage  
99516



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March 09, 2022

Dear Board of Fish,

Just stop!! Common sense. The precious King Salmon first before any kind of fishing. Escapement met before any fishing. Please let them survive. The mis-management of the king salmon is obvious. Keep it equal, sport and commercial to save our precious salmon. Commercial fisherman will survive and sports fisherman will survive with strict restrictions to save the salmon, if not the salmon WILL NOT survive.

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.

Donna Kessler

Anchorage  
99516



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February 17, 2022

Dear Board of Fish,

We live in the Kenai Keys., on the river at mile 42. Since 1970's — We have seen a steady decline in King salmon- . Preserving King Salmon fishery for future generations is exceedingly important.,

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.

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.

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.

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Donna McLeod

Sterling  
99672



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February 17, 2022

Dear Board of Fish,

Hi,

As an avid fisherman. This is not a management proposal it's production fish catch increase. Simply add a 1-2 extension to other fishing boundaries. Lest the Kenai Kings thrive.

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.

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.

Doug Razzano

Phoenix  
85028



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March 07, 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.

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.

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Douglas Hath  
Rancho Palos Verdes  
90275





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February 25, 2022

Dear Board of Fish,

I live in Kenai on the bluff about five miles south of the mouth of the Kenai river , Fishing the Kenai for Kings was one of the things I used to enjoy every summer, the King run has been devastated to the point that I no longer fish for them and if drastic restrictions are not put in place to save the remaining fish it won't matter in a few years there will be nothing left for anyone to fight over . The Trawl fleet kills and dumps thousands of fish a year overboard as bycatch , and nothing is done , if the commercial set netter and guides are allowed to fish before escapement into the river is meet the fishery is doomed , you might as well kill them all and get it over with .

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.

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.

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Duane Hahn

Kenai  
99611





February 16, 2022

Dear Board of Fish,

I was born in Alaska, and I've lived on the Kenai peninsula for about 7 years now. I have still never caught a Kenai king. Why? Because I believe it is irresponsible to fish for them in the current state that they are in. The decisions being made the past few years blow my mind. People used to throw 60 pound fish back because they knew they would get a bigger one. Now a 60 pounder is a really lucky day. Lowering escapement goals will only lead to the complete destruction of the trophy kings we still have. Shut the king fishing down, at least for a few years! At least try to bring back our kings!!!!

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 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?

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.

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.

Dusten Kirker  
Kenai  
99611



Submitted By  
Dwain Foster Sr.  
Submitted On  
3/11/2022 1:43:38 PM  
Affidavit on

Phone  
9072273619  
Email  
[captcod3091@ao.com](mailto:captcod3091@ao.com)

Address  
P.O. Box 162  
Sand Point, Alaska 99661

Members of the Alaska Board of Fish

My name is Dwain Foster Sr. I am a lifelong resident of Sand Point. I own both salmon seine and setnet permits for Area M and have actively fished here for over 50 years.

I am writing in opposition of Proposal 282. Proposal 282 seeks to severely restrict Area M fishing times in both June and July. This action would be crippling to our communities.

In October 2021, the Department clearly stated that ACR 7 (now Proposal 282) was an allocation issue, NOT a conservation issue. In years past when Chinook has not met escapement goals, the Department has used its emergency order authority. In 2021, Chinook met its late run and total escapement and neither one is listed as a stock of concern. With this being said, there is no conservation need to change the Area M management plan out of cycle when we are to be brought before the board in 2023. ADF&G forecasts that Chinook will meet its escapement goal in 2022, which clearly proves that Chinook fishermen are once again advocating restrictions on us that have no real benefit to them.

I urge you to not support Proposal 282. This clearly is an allocation and not conservation and if the Board were to adopt these changes, it would go against Board and Department policy.

Thank you,

Dwain Foster, Sr.



Submitted By  
Dwight Kramer  
Submitted On  
2/1/2022 2:19:52 PM  
Affiliation  
self

### Comments on Proposal 283

While I sympathize with the anguish and financial hardship the commercial set net community feels as they watch hundreds of thousands of sockeye salmon swim by, I also understand the importance of protecting the Kena River LRKs in the present state of continuing extreme low abundance. Anytime we have species that show decline and failing to sustain itself at even the lowest measurements of established escapement goals becomes incumbent on all user groups to accept restrictions necessary to protect that species and give it an opportunity to rebound. First, always.

As users, both sport and commercial, we have to face the reality that until the LRKs are once again at healthy numbers, near the mid-range of the OEG or higher, none of us will ever enjoy full fisheries without restrictions of some sort. We cannot keep treating the lower bound of either the SEG or OEG as thresholds where we expect to have harvest opportunities on a fish over the bare minimums if we ever expect this run to become vibrant once again.

For these reasons I am **OPPOSED** to this proposal.

I also don't understand the premise bringing this proposal forward at this time. It makes no sense on many levels;

It's out of cycle and most people interested in UCI and Kena River fisheries issues won't expect something like this or even know it's on the agenda for the March meeting. This is unfair to other user groups that would have certainly wanted to be involved in the BOF test and discussion portions of the process.

This proposal does not consider the ramifications it would have on other user groups whose harvest restrictions would be based on the OEG at a higher threshold for opportunity. Would the sport fisheries want equal opportunity based on the same SEG parameters as commercial? If so, would the harvest in both fisheries jeopardize the OEG standards for spawner recruitment and further harm all efforts to further rehabilitate the Kena River LRK stocks?

It's especially puzzling, why it's so important to bring this proposal forward at this time when the Kena escapement levels over the past 3 years have been well below either escapement goal and the forecast for this upcoming season is the most dismal in history. It seems counterproductive and inconceivable to even consider going back to a lower spawner escapement level just for the sake of keeping more of these fish, needed for recruitment, and for an opportunity to harvest another species at the same time.

I believe this proposal is shortsighted and lacks full consideration for how it could ultimately affect other user groups and further jeopardize any recovery efforts regarding our LRK stocks. Regulations presently in place are in reference to the established OEG and any further additional discussions regarding LRKs should center around the OEG for the highest standard necessary to help rebuild this run.

Thank you for the opportunity to provide comments on this proposal.



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February 16, 2022

Dear Board of Fish,

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.

Dylan Chamberlin



Submitted By  
Ear Cuzzort  
Submitted On  
1/31/2022 4:09:22 PM  
Aff at on

Phone  
9072235210  
Ema  
[egcuzzort@gmail.com](mailto:egcuzzort@gmail.com)

Address  
17623 Rache C rc e  
Eag e R ver , A aska 99577

I'm unab e to understand why persona use shr mpers n PWS have had the number of pots reduced ast year to two pots per vesse , down from f ve pots n years past, under the gu se that shr mp are be nh over f shed, wh e commerc a shr mpers had an ncrease to the number of pots a owed. Makes no sense.





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February 16, 2022

Dear Board of Fish,

I've caught salmon to feed my family from the Kenai River for the past 43 years so I witnessed the destruction of the world's greatest king salmon run. I know commercial fisherman who fish the Kenai River red salmon run and they have lied all along about their catch of king salmon, and they have significantly contributed to the destruction of the king fishery. Don't help them completely destroy this run of kings. 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.

Ed Tompkins

Palmer  
99645





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February 16, 2022

Dear Board of Fish,

I visited the Alagnak river last year. What a tremendous experience. I would love my children and anyone else to experience the same or better.

Please think of the little guy that pays a lot of money for the way nature should be. Alaska is truly the last frontier. Commercial fishing is just to make as much money as possible. Outdoorsmen enjoy it so much more. Don't ruin a good thing.

Thank you, and planning another trip with the kids next time.

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.

Ed Wetzel

Cochran  
16314



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March 07, 2022

Dear Board of Fish,

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.

edward parra

Kansas City  
64119



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February 16, 2022

Dear Board of Fish,

Please, please, please, NO on Fisheries Proposal 283. To me, these late run Kenai King salmon are the heart and soul of the Kenai Peninsula and could very well be ranked among the most special fish on Earth deserving of their world famous reputation. These fish have placed the Kenai Peninsula on the map as a "must see" fishing destination for many, many people. Over the years, the human factor has arguably taken its toll on these special fish, and we have the collective responsibility of faithful stewardship not for ourselves but for generations yet to come. Shall the destruction of these fish be our legacy? Over the last 20 years, it certainly is looking that way. I fish, and let me be the first to give it up what I love doing to save what I love even more, the precious Kenai King Salmon. Certainly, the biggest takers will feel the most pain, but that burden is the price of saving this fishery for us all, and these fish deserve nothing less. The fisheries board must act with courage and conviction to reverse the massive decline of this run over so many years. I urge the BoF to save these fish AND do everything possible to bring their numbers back for posterity. Do this and restore our collective confidence in the ability of the Board of Fish to manage our most precious PUBLIC resource. Everybody knows we are simply taking too many fish. Everybody knows that lowering the escapement bar for success on paper is not the answer. I would venture to say that such a solution is shortsighted, lacks historical perspective, and is not the path for successful fisheries management. More egregiously, Proposal 283 lacks empathy for those generations yet to come. Previous generations delivered on their promise to us, and we must not fail in our solemn responsibility to those yet to come, for they deserve nothing less and it is not too late.

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.

Edward Vey

Palmer  
99645



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February 16, 2022

Dear Board of Fish,

I have owned property on the Kenai River for over 30 years and have a vested concern about the health of the river. I believe lowering the escapement of the fish will be detrimental to 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.

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.

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.

Edwin Tripp

Yuma  
85367



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March 10, 2022

Dear Board of Fish,

Dear members of the Board of Fish. First, I'd like to thank you for your commitment to public service. Your work on this Board is often a thankless task, but please know your time and efforts are greatly appreciated.

Second, I'd like to provide some comments in opposition to Prop 283. While it may be well intentioned, this proposition is contrary to what should be a goal for you, me and ALL Alaskans: the preservation of our cherished king salmon. Kenai River king salmon runs are dangerously low and either you believe in preserving them or you don't--it's as simple as that. This proposition would add setnet fishing time even when the department recognizes that king runs are low in the Kenai. Setnets are indiscriminate killers and if given more time, MORE KINGS WILL DIE in these nets. That should NOT be an acceptable option for the Board.

Additionally, the burden of conservation should be shouldered by all of the user groups. No one likes fishing restrictions, but paired restrictions spreads the pain of conserving Kenai River king salmon to both commercial and sport fishers. They also serve to reduce the rancor or anger that develops when one user group is singled-out to bear the brunt of conservation. Paired restrictions are a matter of equity. This proposition threatens decoupling those paired restrictions.

Last, I oppose this proposition because simply hearing this board generated proposal--out of cycle--destabilizes the whole Board of Fish process. Why have 3 year cycles when you're going to continually re-hash the difficult decisions from each meeting? There is NO biological reason with this proposition. It has to be exhausting to Board members to face the same difficult decisions, year after year--it certainly is to user groups. It also adds so-called "fish wars" to every legislative agenda and even the Governor's office. Honestly, why would you want to create such instability?!?

In closing, I strongly encourage Board members to REJECT prop 283. It's anti-conservation, it's unfair and its destabilizing. Many thanks for your kind consideration of my thoughts and comments.

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.

Eldon Mulder

Anchorage  
99504



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February 18, 2022

Dear Board of Fish,

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?

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.

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.

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Ellen Elaine Rainey

Kenai  
99661





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February 15, 2022

Dear Board of Fish,

You need to vote NO on 283. The king salmon run is for more important than putting fish on tables for the rich! Save the Kenai salmon, nothing less!

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.

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?

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.

Eric Eckard

WASILLA  
99623



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February 18, 2022

Dear Board of Fish,

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?

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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.

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.

Eric Jean  
Soldotna  
99669



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February 15, 2022

Dear Board of Fish,

I have been sport fishing the Kenai river for 33 years. It's very important to me to protect the Kenai so future generations (including my children) will have the opportunity's that were available to me.

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 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?

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eric mauro

Eagle River  
99577



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March 02, 2022

Dear Board of Fish,

My name is Eric Spade and I live in Eagle River, AK. I have been fishing on the Kenai Peninsula since 1996 and am embarrassed and disappointed by the lack of competent management of the fisheries there. No place and no species is this more relevant than the Kenai River King salmon population. I am not anti-commercial fishing, but it is high time that Cook Inlet commercial interests be put on the back burner due to the decreased population/escapement of Kings on the peninsula and in the Mat-Su streams (Mat-Su silvers are another fish population of concern due to commercial quotas). I urge the Board not to lower King escapement on the Kenai. If anything increase the escapement. Users (sport and commercial) will have to live restrictions until this fishery is restored. My family dip nets on the Kenai and we have gone years without harvesting a king due to restrictions, it's time for everyone to do their part and accept restrictions for this once fabulous fishery.

Thank you for your time, and so the right thing,  
Eric Spade

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.

Eric Spade  
Eagle River  
99577





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February 18, 2022

Dear Board of Fish,

My name is Eric Wallis. I served for 23 years in the Army and I am a two tour combat Vet. I retired in Alaska mainly for the fishing! I could have lived anywhere in the world, but I chose Alaska as my home!

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.

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.

Eric Wallis

Eagle River  
99577



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March 12, 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.

Erica McDaniel



Ernie Carlson  
*FV Desperado*  
PO Box 21  
Chignik, AK 99564  
(907) 749-4042



PC181  
1 of 1

Alaska Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

January 7, 2022

Dear Board of Fisheries,

Subject: PROPOSAL 282 (ACR 7)

As a lifelong Chignik resident and subsistence and commercial fishermen I support PROPOSAL 282. My concern is the viability/sustainability of Chignik's two sockeye runs. The repeated escapement shortfalls on the early run are alarming. For the last four years the early run has not met ADF&G's targeted escapement of 400,000 or the prescribed minimum escapement goal of 350,000. This is unprecedented. Chignik cannot survive economically or culturally at the current rate of persistent sockeye salmon run failures.

Respectfully I ask for Board to pass PROPOSAL 282 calling for the Area M Shumagins and Dolgoi Islands fisheries to be pared-back on fishing time starting on June 15<sup>th</sup> when the Chignik early-run sockeye escapement level set by the Department is not being achieved. This is reasonable knowing, per WASSIP, that Chignik sockeye salmon are harvested in both areas, and there are no terminal-sockeye runs in either area prior to late summer.

Under current regulations, the Shumagins and Dolgoi fisheries are not accountable for stock conservation or aiding terminal-area escapements. These deficiencies were part of why high-seas salmon fishing was stopped in the 1960's. Accountability and management of migrating sockeye salmon intercepted in the Shumagins and Dolgoi areas through July is urgently needed well beyond just limiting time, area, and gear.

According to 5 AAC 39.222, policy for the management of Alaska sustainable salmon fisheries, the burden of conservation should be allocated across user groups. It is time for this policy to be applied to the Shumagin and Dolgoi fisheries by passing PROPOSAL 282.

Thank you

Sincerely,

*Ernie Carlson*



Submitted By  
Ernie Kirby  
Submitted On  
3/4/2022 8:11:32 PM  
Affiliation  
Bottom Line Charters

Phone  
9073738234  
Email  
[info@bottomlinecharters.us](mailto:info@bottomlinecharters.us)  
Address  
12725 E KAYE MARIE CT  
Palmer, Alaska 99645

PROPOSAL 257, 5 AAC 58.0xx and 5 AAC 77.5xx. East Cook Inlet Razor Clam Sport and Personal Use Fisheries Management Plan. Ernie Kirby owner/operator Bottom Line Charters, I support this proposal.

PROPOSAL 256, 5 AAC 77.518. Personal use clam fishery. Ernie Kirby owner/operator Bottom Line Charters, I support this proposal. As a charter operator who has taken people to the west side of Cook Inlet for the past 17 years this proposal is needed.

PROPOSAL 256, 5 AAC 77.518. Personal use clam fishery. Ernie Kirby owner/operator Bottom Line Charters, I support this proposal. As a charter operator who has taken people to the west side of Cook Inlet for the past 17 years this proposal is needed.



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February 16, 2022

Dear Board of Fish,

I live in Palmer and am an Alaskan for the sport fishing and nature. Alaska residents cannot experience the fishing that our parents and grandparents had access too because of over-fishing and mismanagement. We cannot decrease escapement goals or our children will be lucky to see salmon, especially king.

Strong escapement numbers are not being achieved, and this is being reflected in ever decreasing fish populations. 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.

Ethan DeBauche  
Palmer





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February 19, 2022

Dear Board of Fish,

I'm against this proposal I live on the Kenai River and have seen the decline of the world famous Kenai king we need to do everything possible to protect the survival of this one of a kind fish. Also the use of centimeters as a scale of size is a great example of the smoke and mirrors in this proposal. We measure everything in the fish and game regulations in inches. Please vote no on this proposal.

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?

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 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.

Evan Harding

Kenai  
99611



Submitted By  
Ezekiel Brown  
Submitted On  
3/10/2022 3:34:34 PM  
Affiliation

Phone  
9075702725  
Email  
[ezekiel.brown@gmail.com](mailto:ezekiel.brown@gmail.com)  
Address  
PO Box 1219  
Cordova, Alaska 99574

Members of the Board, My name is Zeke Brown, I have fished for sport, subsistence and commercial in Cordova and Prince William Sound my whole life. I currently commercial fish for salmon, Tanner crab and shrimp trawl and pot fish in PWS. Proposal #237 Support Current reporting rate and accuracy is unacceptable. I would encourage the Board to require some sort of monthly reporting so that the fishery can be more actively managed to prevent overharvest. Proposal #238 Oppose Proposal #239 Modify Pot limits per vessel has long been used in commercial, subsistence, and sport harvest in Alaska to limit harvest potential. Recently Shrimp fishermen in PWS have started exploiting the "spare pot" loophole in order to drastically increase the number of pots fished per vessel. Now vessels are regularly heading out with multiple permit holders aboard and multiple limits of shrimp pots which they call "spares". Once the vessel sets one permit holder's limit worth of shrimp pots they simply add marked buoys to the "spare pots" for the next permit holder on board and go set those. In this way they are capable of fishing far more gear per boat than was ever intended by the regulations. I encourage the board to take this opportunity to clarify the regulations which already clearly state a maximum of 5 pots per vessel to include any spare pots aboard the vessel. Proposal #240, #242, #246 Support The current spot prawn management plan does not differentiate sport, personal use and subsistence harvest in the TAH. Allowing sport and personal use harvest when the population is depressed because that which could support a commercial fishery should not be allowed as these user groups have the same priority under law. Noncommercial user groups are the largest user of spot prawns in PWS and are often incapable of being managed to not exceed the rGHL. Allowing the noncommercial user groups to harvest a gear when the population is under 110,000 lbs TAH could put the species at risk of overfishing. I suggest the board adopt the following alternate language for proposal #242 to mirror the commercial fishing regulation: Modify 5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan (a) The department shall manage the sport and other noncommercial shrimp fisheries in the Prince William Sound Area as follows: (1) the guideline harvest level for shrimp taken by pot gear in noncommercial fisheries is calculated as follows: [60 PERCENT OF THE TOTAL ALLOWABLE HARVEST FOR THE AREA] (a) When the total allowable harvest is greater than 200,000 pounds of spot shrimp by round weight, the guideline harvest level for the noncommercial pot gear fishery in the waters described in 5 AAC 31.210(a) is 50 percent of the total allowable harvest for the area. The department will, to the extent practicable, manage the fishery to allow no more than 50 percent of the guideline harvest level to be taken from any one statistical area. (b) When the total allowable harvest is greater than 110,000 pounds but less than 200,000 lbs of spot shrimp by round weight, the guideline harvest level for the noncommercial pot gear fishery in the waters described in 5 AAC 31.210(a) is 60 percent of the total allowable harvest for the area. The department will, to the extent practicable, manage the fishery to allow no more than 50 percent of the guideline harvest level to be taken from any one statistical area. (c) When the total allowable harvest is less than 110,000 pounds of spot shrimp by round weight, commercial and noncommercial pot gear fisheries will be closed except subsistence. (d) When the total allowable harvest is less than 110,000 but above 15,000 pounds of spot shrimp by round weight, the guideline harvest level for the subsistence pot gear fishery is 15,000 pounds which is the amount reasonably necessary for subsistence as determined by the board. (e) When the total allowable harvest is less than 15,000 pounds of spot shrimp by round weight commercial and noncommercial pot gear fisheries will be closed. Proposal 243 support Proposal #247 support The department has two mechanisms to manage harvest in the fishery, pot limits and opener length. However they manage a most soy using pot limits despite our requests otherwise. Commercial fishing is by definition a profit making endeavor and the department should manage fisheries to be harvested in the most efficient way possible. The department's interference with the pace of the fishery in order to benefit a select few fresh market fishermen should not be allowed. Additionally the department's management has created a season that stretches far into salmon season and makes it hard for fishermen to make that part of the season in the Copper River to participate. ADFG has begun making a habit in the spot prawn fishery of having a long closure during the last week of April, first week of May which results in a drastic reduction of fishing opportunity and eliminates a most profitable opportunity available before the copper river opens May 15th. For example, in 2021 the Spot prawn fishery was open for a total of 112 days between April 15th and August 28th. The pace of the fishery was extremely slow but the department still had a 12 day closure from April 28th to May 10th. The department kept a pot limit of 30 pots until May 15th and then expanded it to 40 pots for the rest of the season. That excessive closure eliminated any fisherman who also fishes the Copper River's ability to participate in the second opening and unnecessarily increased the expenses for shrimp fishermen and processors who had to leave the boat and crew during the season. The extremely long season was due to the excessive slow pot limit and shows the department's unwillingness to raise pot limits even with no biological or regulatory justification. For the fishery to be commercial viable we need to harvest the resource efficiently in 2 weeks tops. There is no way for me to pay for fuel, insurance and bait to go fish 25 pots at a maybe 2 lbs per pot cue. Proposal 248 Support As one of the few participants in the fishery I strongly urge the board to approve this proposal. The fishery has been underutilized for its entire existence with a good portion of the gear going unharvested every year due to low participation. The department's claim of egg laying earlier in the season is unfounded in my experience. On the April 15th start date I have seen a most no egg-bearing females when compared with the fall season. While I agree they must lay the eggs at some point in the winter I have seen no evidence that this is between March 15th and April 15th. The fishery simply overtops with too many other fisheries at its current start date for me to participate in this and the bad weather and lack of catch product on from processors in the fall makes it hard to participate in that season. Proposal 250 Support Gear conflict with noncommercial users is becoming more and more of an issue



in the commercial spot prawn fishery as well as enforcement of commercial fishing boats hauling noncommercial pots and sealing that shrimp. This would also be a much better time for many participants including myself and the local processors to be fishing as it doesn't overlap with the summer salmon season as badly. Concerns of gear loss due to ice are overblown, there's plenty of ice moving during the current opener in April and I have not lost any gear to ice. Proposal 251 Oppose I am opposing this proposal due to Section F which would make it illegal to fish a floating processor in these shrimp fisheries. Small-scale floating processors have been harvesting in this fishery since it reopened in 2010 and should not be excluded. The best quality and highest value shrimp are frozen at sea and allowing floating processors to work with other fishermen to freeze their own catch as well as others only benefits this fishery. I personally was planning on registering my boat as a floating processor for the 2022 season and working with a couple other shrimpers to purchase and process their catch until I saw this proposal. This proposal is another example of the department exceeding their authority in order to benefit a certain type of commercial fisherman over another. With the reporting requirements in this proposal there's no reason the department can't manage floating processors as well. Proposal 252 support Allowing catcher boats to also act as tenders is allowed in salmon under the transporter regulation and that should be mirrored in shrimp fisheries. Fresh shrimp needs to be frozen or soiled within three days of harvest. It makes no sense for 50 shrimp boats to all run back and forth to town every three days when they could simply consolidate their catch on one boat. The low volume in these fisheries makes it difficult to afford a dedicated tender vessel and consequently this would greatly increase the profitability of this fishery. This would also increase the ability for processors from further ports such as Cordova to compete in the market which could drive prices paid to fishermen up. Proposal 253 Support This bycatch regulation needs to be changed as it's foolish to be required to throw shrimp overboard as dead loss. The department's own data shows no harvest of spot shrimp in this fishery since 1996 yet they oppose this proposal due to increasing spot harvest? Currently a fisherman, if they wanted to, could throw every pink shrimp they catch overboard and it would not contribute to the bycatch allowance. The idea that fishermen currently keep low value pink shrimp and throw spot prawns overboard is ludicrous. This regulation with no way to increase spot harvest; it will simply help stop the wanton waste of pink shrimp by not requiring them to be discarded dead whenever they are harvested in excess of 20%. Proposal 254 Support The department has the ability to put observers on shrimp trawler boats and has in the past. I personally have not seen any king or tanner crab mortality from this fishery in the western sound. As far as I know there's no king crab population in eastern Prince William Sound and the department currently bottom trawls the area frequently to do tanner crab surveys. If it's ok for the department to trawl this area targeting tanner crab why shouldn't commercial fisherman be allowed to trawl to target shrimp as has been done in the past? If evidence of tanner crab mortality was to result from this small-scale fishery I would be the first to call for its closure.





Submitted By  
Fimon basarg n  
Submitted On  
3/10/2022 10:55:47 AM  
Aff at on

Phone  
9072991560  
Ema  
[Ph\\_basarg\\_n@gma\\_.com](mailto:Ph_basarg_n@gma_.com)  
Address  
Pobox 2884  
Homer, Alaska 99603

He o Mr. Cha r an boardmembers I Fimon Basarg n am an owner of a Kodak tanner permit an due to the January 15th opening date I have lost multiple seasons due to frozen harbor in homer and launch ramps and other various impediments and due to extreme weather and ice build up! It's making it next to impossible to make it out of homer harbor and changing the weather to kodak. It would really help us out if the opening date would be moved to February 1st where it would be far less challenging and a safer trip and fishery for the future. Please consider looking into this! Thank you! God bless!



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February 22, 2022

Dear Board of Fish,

I strongly oppose Proposal 283!!!! SAVE THE KINGS!!!!!!

Instead of catering to the demands of the greedy commercial fisherman, do what is right for the sportsfisherman who bring the money into the state!

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.

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 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.

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.

Floyd Ring

Discovery Bay  
94505

Submitted By  
Francis Estabrook  
Submitted On  
2/13/2022 5:19:53 PM  
Affiliation  
Anger



PC188  
1 of 1

PROPOSAL 283... **AGAINST.** At a time when late run Kenai chinook are at historic lows, this simply the wrong proposal at the wrong time. Board members, ask yourselves... why even consider going down this path when the entire unfished run-size failed to scratch the lower bound SEG in the past three years? Bottom line, Kenai chinooks are in trouble. It is incumbent upon you to do EVERYTHING in your power to increase the run numbers. If anything, you should be giving ADFG even MORE prescriptive guidance to achieve escapements spread within the full range of the OEG to help restore the iconic Kenai chinooks to historic abundance... NOT letting them fail through the escapement floor! In contrast, this ill-conceived proposal seeks yet again to LOWER the conservation bar for a horribly depleted stock... but wait, only for the "special" people. A double standard for conservation is the last thing the late run chinooks need. This foolish proposal only increases the risk that the conservation objective WILL NOT BE MET in 2022. If that should occur, four consecutive years of escapement failure is certain to place this population in a "stock of concern" status. Do you really want that blood on your hands? Please.... **JUST SAY NO!** Submitted by Francis V Estabrook, MD



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February 23, 2022

Dear Board of Fish,

I've lived on the peninsula and fished the Kenai river since the 1990's and have watched the run of large Kings get decimated by commercial fishing, the set netters being the worst offenders. Lower the number of spawners and you guarantee that the large Kenai Kings will never return.

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.

Frank casey

Clam Gulch  
99568

Frank Kashevarof Jr.  
P.O. Box 52  
Seldovia, AK 99663  
(907) 351-5617



PC190  
1 of 1

Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, Alaska 99811

January 3, 2022

Subject: Proposal 282

Dear Alaska Board of Fisheries,

I support Proposal 282. Its adoption would better insure that the Chignik early-run remains sustainable for future generations. The issue is that our early-run escapement is not being met. This has been the situation for the past four years even with total annual closures, through June and July, of the entire Chignik Management Area.

Proposal 282 is is totally grounded on stock conservation. Since the Shumagin Islands and Dolgoi Area fisheries harvest Chignik-bound sockeye salmon, through July based on the Department's WASSIP report, it is prudent that these fisheries share in the responsibility for Chignik's early-run escapement being met.

Fishing time in Shumagin Islands and Dolgoi Area would be reduced, under Proposal 282, only if the Chignik early-run is not expected to meet the mid-point of the Department's escapement goal. This is not too much to ask. Chignik is dependent on the viability of the early-run for subsistence, culture, and economic sustainability.

Best regards,

*Frank Kashevarof Jr.*

Best regards,

*Frank Kashevarof Jr.*



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February 26, 2022

Dear Board of Fish,

We have dear friends that live in There, and we come to visit them so I can enjoy fishing. I gladly pay the fees to fish. And I enjoy the fish for the year! When I am fishing I see many people enjoying the time fishing, friends and the treasurer of having the treasure of salmon to enjoy year around.

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.

Frank Vonada

Lower Lake  
95357





March 03, 2022

Dear Board of Fish,

I have been aa Alaskan resident, sports fisherman, for most of the last 39 years. During those years the Kenai King fishery has been decimated and miss managed so that commercial fishing for reds could occur, while ignoring the harvest of by-catch king salmon. Please do not pass Proposition 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.. Don't punish most of the residents of Alaska to placate a few commercial fisherman,.

The OEG is the OEG set escapement threshold 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.

As sport and subsistence fishermen like myself and my neighbors, 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 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.

Fred king  
38434 Down Riggers St  
Kenai  
99611-5936

Email address: [alasking@gci.net](mailto:alasking@gci.net)  
Phone number: 9073492997



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February 24, 2022

Dear Board of Fish,

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.

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?

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.

Fred Larson

Anchorage  
99502



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February 24, 2022

Dear Board of Fish,

I have been a resident of Alaska since 1979. I have a place on the Kenai River and have been there since the early 1980's. The Kenai Kings were abundant and provided much recreation for residents and tourists. During my time on the Kenai I have seen the King population continually decrease until now there aren't any Kings or I should say very few Kings coming back to the Kenai River. If we want Kenai Kings to recover we need to stop some of the commercial fishing that prevents Kings from entering the Kenai. I commercial fished for several years and fishing for Reds we would catch Kings that were supposed to be returned to the waters where they were caught. Unfortunately during my commercial fishing we were only able to return 1 or 2 Kings to the water as the rest became pinned in the nets and because of the tides they would drown. I realize the people that became commercial fisherman that fish as part of their living want to fish for Reds no matter what happens. If we want Kings to return to the Kenai River, something needs to be done, like closing the river to King fishing for an extended period of time so they can recover. I am currently against the 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.

G. Bruce Talbert

Sterling  
99672

January 26, 2022

Garrett Olsen  
3107 SW 171 Street  
Burien, WA 98166

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

Subject: Proposal 282 (ACR 7)

Dear Alaska Board of Fisheries,

Proposal 282 calls for reduced fishing time in the Dolgoi Islands and Shumagins if the Chignik early sockeye run is not making escapement.

As a Chignik commercial fisherman for 38 years, I support the proposal.

Area M's south side is principally a sockeye and chum salmon interception-fishery in June and July, and within the eastern reach Chignik-bound sockeye are harvested in the Dolgoi and Shumagin waters (F&G WASSIP study). Chignik's early-run has failed for the last four years by providing no fishery and inadequate escapements. Proposal 282 offers one solution to the problem. Other measures could be appropriate. I see Proposal 282 as a minimum step in the right direction.

When Proposal 282 was presented to the Board as ACR 7, several months back, a few suggested that the proposal could be allocative. Nothing in the proposal is allocative. It was brought to the table for the sake of conservation and sustainability of the Chignik early-sockeye salmon run. Chignik stakeholders have been doing their part, and now is the time for Area M to assist by reducing their interception of Chignik sockeye salmon when there is an escapement shortfall. Under the Board's Policy for Sustainable Salmon Fisheries, it is justified and ethically appropriate. Thank you for considering my comments.

Sincerely,

*Garrett Olsen*







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February 16, 2022

Dear Board of Fish,

Stop allowing bycatch of king salmon. Our run is almost gone!!

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.

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.

Gary Canterbury

Kenai  
99611



To: AK BOF

Statewide meeting

March 2022

From: Gary Hollier

Kenai, AK

Subject: Fry Data

in Skilak & Kenai Lakes

and then combined

Fall of 2020 - 53,981,990

Fall of 2021 - 13,694,448

of which 50% were

1 year holdovers from

2020



2017	Skil	25,693,134	1.18E+13	3,440,885	0.99573	0.9420	0.0546	490	6.00E-08	3.45E-04	3.44E-04	25,500,121	3.0770E+1
	Ken	1,936,917	3.11E+10	176,247	0.9952	0.9940	0.002	371	1.62E-06	4.75E-06	3.17E-06	1,927,581	1.1770E+1
	Both	27,630,051	1.19E+13	3,445,395								27,511,005	
2018	Skil	21,741,420	3.07E+12	1,753,433	0.98990	0.8177	0.1722	1089	3.17E-09	4.20E-03	7.00E-04	21,521,810	3.0127E+1
	Ken	1,288,687	2.11E+10	145,264	0.9968	0.9935	0.003	924	1.70E-07	9.36E-06	9.18E-06	1,284,504	2.0965E+1
	Both	23,030,107	3.10E+12	1,759,440								22,806,313	3.0337E+1
2019	Skil	18,210,862	1.57E+13	3,968,251	0.98426	0.7104	0.2739	1438	1.71E-06	3.20E-03	3.20E-03	17,924,223	1.5256E+1
	Ken	1,475,864	2.23E+10	149,397	0.9939	0.9800	0.007	1140	2.45E-05	6.77E-05	4.40E-05	1,466,861	2.2101E+1
	Both	19,686,726	1.58E+13	3,971,063								19,391,084	1.5278E+1
2020	Skil	7,031,576	6.97E+11	834,989	0.96612	0.6950	0.2709	797	3.65E-06	3.20E-03	3.08E-04	6,793,346	6.5094E+1
	Ken	2,065,176	3.26E+10	180,434	0.9915	0.9915	0.000	473	4.05E-06	4.05E-06	0.00E+00	2,047,705	3.2025E+1
	Both	9,096,752	7.30E+11	854,262								8,841,051	6.8297E+1
2021	Skil	42,073,699	5.89E+13	7,673,023	0.99507	0.9930	0.0021	797	5.15E-08	3.53E-06	3.50E-06	41,866,275	5.8296E+1
	Ken	11,121,053	1.40E+12	1,182,216	0.99952	0.9970	0.002	473	1.05E-07	4.16E-06	4.04E-06	11,115,715	1.3963E+1
	Both	53,194,752	6.03E+13	7,763,563								52,981,990	5.9693E+1
2022	Skil	11,885,750	2.13E+12	1,458,767	0.98311	0.4780	0.5049	524	3.80E-07	9.41E-03	3.52E-03	11,685,000	2.0568E+1
	Ken	2,011,964	4.54E+10	212,982	0.99875	0.6870	0.312	3185	4.46E-06	2.11E-03	9.73E-02	2,009,449	4.5266E+1
	Both	13,897,714	2.17E+12	1,474,232								13,694,448	2.1020E+1



Original Message  
From: Frothingham, Alyssa (DFG)

<[alyssa.frothingham@alaska.gov](mailto:alyssa.frothingham@alaska.gov)>

Sent: Wednesday, February 16, 2022 8:45 AM

To: Marston, Brian H (DFG)

<[brian.marston@alaska.gov](mailto:brian.marston@alaska.gov)>

Subject: RE: Registration



PC197  
2 of 5

*TO: Alaska BOF  
statewide meeting  
March 2022*

*From: Gary Hollen  
Kenai, AK*

*Subject: Area Registration  
and permits / statistical area*

Stat #            24421    24422    24431

**24432**    24441    24442    Grand Total  
*North K-Beach*

Count of cfec permits    107    116    59

**49**    59    38    428

*NKB*

-----Original Message-----

From: Marston, Brian H (DFG)

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Sent: Wednesday, February 16, 2022 8:23 AM

To: Frothingham, Alyssa (DFG)



Table 1. Late-run Kenai sockeye salmon brood table. Note: Hidden enhanced was not subtracted to estimate spawners.

Brood Year	Spawners	Adult Return													Return per Spawner	Run	Total Harvest	Harvest Rate
		0.2	1.1	0.3	1.2	2.1	0.4	1.3	2.2	3.1	1.4	2.3	3.2	2.4	3.3			
1968	115545			0	169641	894	0	657176	77265	0	1456	53737	0	0	0	960169	8.3	
1969	72901	0	894	0	37929	7740	0	209347	94190	0	10719	66771	3356	0	0	430947	5.9	
1970	101794	0	1548	0	65999	6143	0	195322	136422	0	0	136620	8869	0	0	550923	5.4	
1971	406714	0	4472	0	57003	10019	0	338382	299954	0	10340	266227	0	0	0	986397	2.4	
1972	431058	0	5738	0	564078	17738	0	1656310	182117	0	1140	120729	0	0	0	2547851	5.9	
1973	507072	0	8966	0	153573	0	0	1825724	87313	0	0	50410	0	0	0	2125986	4.2	
1974	209836	0	0	0	59726	1710	0	488947	94517	0	0	143167	0	0	0	788067	3.8	
1975	184262	0	0	0	162573	0	0	623465	209203	0	0	60132	0	0	0	1055373	5.7	485350 301088 0.62
1976	507440	0	1391	0	457669	6092	0	804033	95053	1142	2930	136815	0	888	0	1506012	3.0	1374607 867167 0.63
1977	951038	0	41798	0	212799	3251	0	2421274	67308	0	18530	347053	0	0	607	3112620	3.3	2268567 1317529 0.58
1978	511781	0	0	0	136820	0	0	3250866	67217	0	38048	285747	6343	0	0	3785040	7.4	2096342 1584561 0.76
1979	373810	0	1295	29452	259051	4699	0	565799	149644	0	11216	292947	4810	2125	0	1321039	3.5	797838 424028 0.53
1980	615382	0	3655	18199	218853	2613	690	1597876	271442	0	14942	545024	0	0	0	2673295	4.3	1481394 866012 0.58
1981	535524	825	0	7818	301195	2217	0	1244961	295294	0	6783	605230	0	0	0	2464323	4.6	1176410 640886 0.54
1982	755672	4413	1392	36636	803813	1950	2978	7661502	297352	0	23314	744869	0	9482	0	2766442	12.7	2766442 2010770 0.73
1983	792765	1216	0	22901	795150	0	0	4465204	262695	0	49747	3878906	0	10975	0	9486794	12.0	3981411 3188646 0.80
1984	446297	0	0	2383	547407	4,517	0	1,662,723	701,759	7,674	19,946	905,800	6,291	609	0	3,859,109	8.6	1,286,678 840,381 0.65
1985	573,761	0	4,130	4,862	314,370	20,065	0	1,568,911	297,302	0	4,858	372,746	678	0	0	2,587,921	4.5	2,496,016 1,922,255 0.77
1986	555,207	1,727	4,959	15,702	390,370	3,222	2,037	834,890	140,049	0	11,395	752,587	0	8,200	0	2,165,138	3.9	2,945,961 2,390,754 0.81
1987	2,011,657	0	5,664	48,620	771,535	4,509	0	7,009,121	300,271	0	105,416	2,096,054	1,114	14,322	0	10,356,627	5.1	9,391,896 7,380,239 0.79
1988	1,212,865	405	1,146	0	150,926	7,079	0	1,491,076	292,223	596	21,861	573,931	2,853	4,544	0	2,546,679	2.1	6,054,519 4,841,654 0.80
1989	2,026,619	3,919	0	16,807	352,278	77,839	0	2,469,188	555,383	1,407	17,207	948,211	0	16,440	0	4,458,679	2.2	6,656,274 4,629,655 0.70
1990	794,616	1,133	3,459	5,931	222,285	13,834	0	771,248	189,043	0	10,973	283,961	2,423	3,405	0	1,507,693	1.9	3,224,183 2,429,567 0.75
1991	727,146	1,592	4,331	10,275	662,798	22,619	0	2,764,304	251,886	1,839	17,583	689,932	2,928	2,958	3,030	4,436,074	6.1	2,182,082 1,454,936 0.67
1992	1,207,382	0	2,610	8,468	345,350	10,423	0	3,442,905	140,639	0	19,992	293,917	2,775	4,497	0	4,271,576	3.5	8,235,298 7,027,916 0.85
1993	997,693	0	0	14,950	288,883	7,055	0	816,311	196,799	1,642	12,461	330,508	14,864	6,306	0	1,689,779	1.7	4,446,195 3,448,502 0.78
1994	1,309,669	0	1,762	0	484,075	77,318	0	1,727,282	439,229	1,822	17,644	291,648	9,532	0	2,322	3,052,634	2.3	3,886,918 2,577,249 0.66
1995	776,847	0	3,402	8,637	429,006	16,262	0	1,039,246	154,484	0	15,060	230,897	0	2,266	610	1,899,870	2.4	2,628,555 1,851,708 0.70
1996	963,108	0	0	13,177	254,663	26,314	0	1,532,580	157,933	0	25,384	246,751	2,554	2,402	0	2,261,757	2.3	3,696,067 2,732,959 0.74
1997	1,365,676	0	1,765	0	230,281	16,857	0	2,141,616	327,086	1,220	16,829	873,668	0	10,985	6,095	3,626,402	2.7	4,610,042 3,244,366 0.70
1998	929,090	0	3,740	3,017	701,989	12,436	0	2,710,969	314,136	1,356	30,290	677,566	6,351	3,477	0	4,465,328	4.8	1,902,219 973,129 0.51
1999	949,276	1,833	0	11,713	499,236	4,232	0	3,957,730	426,477	0	18,160	807,582	14,996	10,825	2,279	5,755,063	6.1	2,984,568 2,035,292 0.68
2000	696,899	4,396	634	19,641	562,552	7,454	0	4,988,074	123,670	0	67,227	1,253,952	2,279	23,772	4,682	7,058,333	10.1	1,814,779 1,117,880 0.62
2001	738,229	0	0	12,693	133,740	4,837	0	1,102,407	103,974	0	52,226	279,858	4,682	3,540	0	1,697,957	2.3	2,189,670 1,451,441 0.66
2002	1,126,616	1,906	38	13,104	281,726	10,825	0	2,837,840	156,677	0	95,584	227,610	0	3,403	0	3,628,712	3.2	3,466,762 2,340,146 0.68
2003	1,402,292	0	0	4,682	213,585	23,772	0	1,267,159	150,560	0	20,902	235,750	3,403	0	0	1,919,813	1.4	4,439,571 3,037,279 0.68
2004	1,690,547	0	0	7,289	315,905	14,785	0	1,764,966	239,153	0	8,272	858,115	4,316	8,142	15,658	3,236,600	1.9	5,705,141 4,014,594 0.70
2005	1,654,003	0	0	3,403	148,984	3,403	0	1,598,266	168,314	0	23,800	2,857,849	0	0	0	4,804,018	2.9	6,109,173 4,455,170 0.73
2006	1,892,090	0	7,048	4,316	841,212	101,060	0	2,438,848	340,712	0	79,654	1,172,388	0	21,043	0	5,006,280	2.6	2,848,597 956,507 0.34
2007	964,243	4,316	8,272	0	498,542	71,399	0	2,151,603	739,778	0	21,043	876,917	0	0	6,808	4,378,678	4.5	3,601,777 2,637,535 0.73
2008	708,805	0	8,142	0	591,917	11,447	0	1,987,848	261,588	0	0	519,456	0	0	0	3,380,397	4.8	2,082,431 1,373,626 0.66
2009	848,117	0	22,894	0	438,640	14,150	0	2,160,200	246,112	0	14,894	903,197	0	9,368	0	3,809,455	4.5	2,430,414 1,582,297 0.65
2010	1,038,302	0	6,893	13,616	416,994	27,232	0	1,671,965	314,687	0	21,515	1,121,581	0	28,965	1,939	3,625,388	3.5	3,596,458 2,558,156 0.71
2011	1,280,733	0	13,616	0	895,559	18,713	0	2,119,496	185,225	0	45,340	1,221,727	3,113	8,197	1,047	4,512,033	3.5	6,263,091 4,982,359 0.80
2012	1,212,921	0	0	2,230	240,206	10,283	0	1,057,626	75,078	0	24,788	57,899	0	0	0	1,468,110	1.2	4,769,681 3,556,760 0.75
2013	980,208	0	1,938	992	147,848	8,094	0	586,542	184,646	0	6,686	171,698	0	0	0	1,108,445	1.1	3,628,121 2,647,914 0.73
2014	1,218,342	1,530	3,468	0	662,868	37,164	0	2,956,384	104,727	0	8,254	34,198	0	1,077	0	3,809,669	3.1	3,404,034 2,185,693 0.64
2015	1,400,047	881	2,179	0	292,337	9,627	0	1,231,517	97,176	0	18,845	614,731	0	4,728	959	2,272,980	1.6	3,819,016 2,418,969 0.63
2016	1,119,988	0	983	2,337	1,019,327	0	0	2,649,780	180,518	0						3,711,842	2,591,855	0.70
2017	1,071,064	271	939	6,072	490,759	19,313										2,595,720	1,524,656	0.59
2018	886,761	2,716	8,530													1,566,210	679,450	0.43
2019	1,457,031															3,542,442	2,085,411	0.59
2020	1,505,940															2,394,018	888,078	0.37
2021	2,241,825															3,992,341	1,750,516	0.44
Mean (1975-2013)	982271	710	3999	9270	403097	17253	146	2213024	253592	479	25962	744371	2469	5670	1156	3681198	4.2	3370572 2402941 0.68

Genetic estimates of stock-specific harvests.

Preliminary age composition catch allocation model estimates of stock-specific harvests.

Average of 1968 to 2015





Table 1. Kaslof sockeye salmon brood table.

Brood Year	Spawners	Adult Return													Return per Spawner	Run	Total Harvest	Harvest Rate
		0.2	1.1	0.3	1.2	2.1	0.4	1.3	2.2	3.1	1.4	2.3	3.2	2.4	3.3			
1968	90,958			0	86418	115	0	42653	14079	0	0	2588	0	0	0	145853	1.6	
1969	46964	0	231	0	12833	204	0	85255	6389	0	0	5484	0	522	0	110919	2.4	
1970	38797	0	0	0	38507	299	0	8744	69392	0	0	51297	0	0	0	168239	4.3	
1971	91887	0	0	0	36811	268	0	107438	101308	0	0	49258	0	0	0	295083	3.2	
1972	115486	49	494	0	115995	0	0	103393	114377	0	0	38332	0	0	0	372639	3.2	
1973	40880	0	473	0	119001	2433	0	176558	38748	0	0	4521	0	0	0	341734	8.4	
1974	71540	0	2753	0	206299	0	0	80966	34636	0	1350	16890	0	0	0	342896	4.8	
1975	48884	0	0	0	180735	0	0	114556	20631	0	0	8677	0	0	0	321500	6.6	
1976	142058	440	1801	0	246019	0	0	368132	33934	0	0	41369	0	0	0	691693	4.9	121242 72358 0.60
1977	158410	0	4087	0	149225	0	0	358492	51558	0	0	46809	0	0	0	610171	3.9	377033 234975 0.62
1978	119165	0	0	0	172123	465	0	364997	104687	0	0	53408	0	0	0	610171	3.9	391215 232805 0.60
1979	155527	0	2465	0	407690	0	0	204991	112060	0	2937	52479	0	1199	0	783821	5.0	459937 340772 0.74
1980	188314	0	0	0	264207	577	0	485118	258171	0	3504	71144	0	0	0	1082721	5.7	303099 147572 0.49
1981	262271	0	0	0	854061	1742	0	679270	220031	0	0	95613	236	2489	0	1853442	7.1	400433 212119 0.53
1982	184204	0	2187	0	529984	267	0	345805	266602	0	1718	141028	0	0	0	1287592	7.0	559968 297697 0.53
1983	215730	748	0	0	348596	484	0	353642	239227	0	244	65366	0	0	0	1008308	4.7	626472 442268 0.71
1984	238413	0	709	0	255882	382	0	163788	252891	0	1476	90632	934	0	0	766694	3.2	924183 708453 0.77
1985	512827	0	143	0	62021	129	0	133572	123311	0	769	49795	0	0	0	369740	0.7	635243 396830 0.62
1986	283054	0	0	596	101750	0	0	232645	189244	0	0	150016	0	0	0	674252	2.4	1656695 1143868 0.69
1987	256707	0	656	775	133031	162	0	330225	248546	0	0	174387	0	0	0	887782	3.5	1506147 1223093 0.81
1988	204336	214	0	0	159892	738	0	197694	173302	0	0	133336	0	0	0	665176	3.3	1058045 801338 0.76
1989	164952	0	0	0	63863	590	0	189085	145680	0	0	113166	0	0	0	512385	3.1	994511 790175 0.79
1990	147663	0	567	0	147703	0	0	110369	174950	0	0	68223	0	0	0	501812	3.4	544439 379487 0.70
1991	233646	0	0	0	222798	0	0	414977	205588	0	0	102874	0	0	0	946237	4.0	452927 305264 0.67
1992	188819	0	386	0	185940	0	0	453802	122402	0	1496	51892	0	0	0	815919	4.3	606635 372989 0.61
1993	151801	0	0	0	145659	0	0	155518	125775	0	1801	92168	441	0	0	521361	3.4	889417 700598 0.79
1994	218826	0	0	0	195201	1883	0	297531	196873	0	0	74041	0	0	0	765529	3.5	610403 458602 0.75
1995	202,428	682	388	0	237,182	373	0	190,926	56,162	0	1,141	42,235	1,019	491	0	530,599	2.6	615804 396978 0.64
1996	264,511	0	0	0	208,276	1,202	0	377,605	109,373	0	1,958	53,153	0	0	0	751,566	2.8	621,669 419,241 0.67
1997	263,780	0	403	0	217,593	707	0	279,338	118,996	0	0	65,542	0	0	0	682,580	2.6	874,728 610,217 0.70
1998	259,045	0	1,386	0	206,816	4,941	0	264,189	248,417	0	1,194	65,365	0	0	0	792,308	3.1	824,737 560,957 0.68
1999	312,481	0	1,542	0	279,767	1,343	0	224,666	511,584	0	0	139,448	538	0	0	1,158,888	3.7	532,835 273,790 0.51
2000	263,631	0	2,972	0	614,279	1,272	0	468,763	191,547	0	0	109,599	0	0	0	1,388,432	5.3	826,369 513,888 0.62
2001	318,735	966	1,287	0	420,057	1,918	0	573,939	515,285	0	0	114,216	0	0	0	1,627,669	5.1	751,059 432,324 0.58
2002	235,732	0	4,747	0	663,235	7,708	0	292,890	222,994	0	0	58,449	0	0	0	1,250,022	5.3	667,235 431,503 0.65
2003	353,526	0	10,152	0	517,851	1,852	0	603,710	282,320	0	1,989	142,431	0	0	0	1,560,304	4.4	862,230 508,704 0.59
2004	523,653	0	7,406	0	622,458	2,836	0	501,436	298,674	0	0	58,286	0	0	0	1,491,097	2.8	1,420,613 896,960 0.63
2005	360,065	0	5,672	0	128,287	24,088	0	255,738	255,738	0	0	209,155	0	0	0	878,678	2.4	1,227,018 866,953 0.71
2006	389,645	0	8,066	0	226,513	12,034	0	249,075	207,535	0	0	41,424	0	0	0	744,647	1.9	1,879,917 1,490,272 0.79
2007	365,184	1,719	8,596	0	110,448	21,782	0	66,847	237,982	0	0	37,013	0	0	0	484,387	1.3	1,157,209 792,025 0.68
2008	327,018	0	11,741	0	215,278	28,080	0	268,221	318,776	0	0	31,544	0	0	0	873,640	2.7	1,575,445 1,248,427 0.79
2009	326,283	0	42,815	0	346,060	11,636	0	324,152	227,315	0	0	83,653	0	0	0	1,035,630	3.2	1,104,972 778,689 0.70
2010	295,265	1,906	19,460	0	467,313	29,448	0	409,452	415,209	0	720	32,518	639	929	0	1,377,594	4.7	818,623 523,358 0.64
2011	245,721	4,191	18,970	0	246,611	12,219	0	97,688	188,641	0	954	117,098	0	0	0	686,373	2.8	809,736 564,015 0.70
2012	374,523	2,232	5,522	0	143,497	9,406	0	152,743	191,458	0	0	4,671	0	0	0	509,530	1.4	632,426 257,903 0.41
2013	489,654	0	7,664	0	284,613	32,073	0	74,533	247,799	0	0	3,170	0	0	0	649,852	1.3	1,003,071 513,417 0.51
2014	440,192	0	22,034	0	376,236	9,182	0	195,978	81,837	0	2,913	12,071	0	0	0	700,251	1.6	1,102,934 662,742 0.60
2015	470,677	0	4,743	0	317,073	5,803	0	434,680	34,300	0	0	24,048	0	120	0	820,766	1.7	1,174,899 704,222 0.60
2016	239,981	0	9,391	825	359,785	0	0	234,081	52,526	0								480,774 240,793 0.50
2017	358,724	96	331	509	594,828	10,763												801,902 443,178 0.55
2018	388,009	0	8,718															717,164 329,155 0.46
2019	373,416																	613,252 239,836 0.39
2020	541,651																	845,000 303,349 0.36
2021	516,859																	925,474 408,615 0.44
Mean (1975-2010)	253,794	185	3,879	38	286,328	4,407	0	313,946	207,871	0	582	82,235	106	134	0	899,718	3.9	816,931 563,137 0.66

Genetic estimates of stock-specific harvests.

Preliminary age composition catch allocation model estimates of stock-specific harvests.

Average of 1968 to 2014



Table 1. Susitna sockeye salmon brood table.

Brood Year	Spawners	Adult Return													Return per Spawner	Run	Total Harvest	Harvest Rate
		0.2	1.1	0.3	1.2	2.1	0.4	1.3	2.2	3.1	1.4	2.3	3.2	2.4	3.3			
1999														0	0			
2000											589	28,113	0	0	0		28,703	
2001							0	157,173	26,403	0	268	49,897	1,147	230	0		235,117	
2002				12,182	231,804	0	0	367,152	33,646	0	2,021	61,425	896	0	0		709,126	
2003		7,774	1,733	15,076	101,249	2,336	896	260,130	29,321	0	1,538	27,171	0	0	244		447,468	
2004		8,112	1,414	24,588	57,372	3,617	0	140,590	40,724	0	0	71,592	212	0	0		348,222	
2005		2,951	5,409	5,867	91,176	4,328	0	71,973	15,750	244	965	32,992	0	0	0		231,655	
2006	415,791	5,867	3,097	10,482	98,345	3,413	0	299,940	22,049	0	5,247	37,337	0	0	0	1.2	465,772	49,981
2007	322,718	30,716	3,169	90,136	65,062	21,191	0	130,741	39,321	698	819	29,663	0	0	0	1.3	580,297	257,579
2008	299,736	1,745	4,456	7,028	79,149	11,240	0	219,616	17,708	0	2,184	30,239	0	0	413	1.2	448,856	149,120
2009	207,409	4,910	5,247	9,950	95,723	15,322	0	102,628	39,237	0	413	53,351	413	0	0	1.6	320,359	112,950
2010	184,472	9,691	18,823	4,341	120,288	0	0	331,872	17,837	0	985	41,585	232	0	0	3.0	306,140	121,668
2011	307,681	5,078	980	27,133	142,781	7,531	0	211,428	25,261	319	1,087	51,512	0	273	0	1.5	538,537	230,856
2012	135,948	2,063	1,433	23,119	93,567	11,517	0	192,001	32,594	0	0	1,766	0	0	0	2.6	320,917	184,969
2013	219,130	15,396	6,224	2,686	117,455	0	0	97,288	31,749	221	0	7,351	0	0	0	1.3	417,316	198,186
2014	161,770	538	552	0	140,357	444	0	139,056	1,409	0	360	13,928	0	0	0	1.8	304,974	143,204
2015	367,871	0	648	172	111,980	0	0	134,931	26,439	0	356	68,062	0	0	0	0.9	585,240	217,369
2016	293,401	0	1,005	0	71,773	347	0	153,306	18,232	0							429,634	136,232
2017	200,850	0	1,969	0	169,236	0											398,425	197,575
2018	161,027	0	1,946														272,746	111,719
2019	172,949																260,972	
2020	200,705																249,747	
2021	334,034																411,138	
Mean (2006-2010)	286,025	10,586	6,958	24,388	91,714	10,233	0	216,960	27,230	140	1,929	38,435	129	39	59	1.6	424,285	138,260

Genetic estimates of stock-specific UCI CF harvests.

Preliminary age composition catch allocation model estimates of stock-specific UCI CF harvests.

Complete brood year returns.

Average 2006 to 2014



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March 02, 2022

Dear Board of Fish,

My home is on the lower Kenai River near river mile 12. I am a retired ADF&G biologist who spent 20 years working to preserve and protect anadromous fish habitat and populations throughout South Central Alaska including Kenai Peninsula. My last five years of service were at the Kenai River Center. I urge the Board of Fisheries to vote No on Proposal 283. This valuable King Salmon resource cannot be managed in such a way that any of the five salmon species or other resident fish population is put at risk of decline or extinction by any user group allocated access to these resources.

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.

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.

Gary Liepitz

Kenai  
99611



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February 16, 2022

Dear Board of Fish,

Do not reduce the escapement goals for Kenai River King salmon. Goals have already been reduced to a level which is endangering the sustainability of this fishery. No

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.

Gary Tanghe

Sterling  
99672





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March 08, 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.

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.

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.

Geoff Lundfelt

Anchorage  
99507



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February 19, 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.

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.

George Bennett

North Pole  
99705



Submitted By  
George Gundersen  
Submitted On  
3/11/2022 5:13:25 PM  
Aff at on

Phone  
9073861308  
Ema  
[gotosaak@hotmail.com](mailto:gotosaak@hotmail.com)

Address  
P.O. Box 51  
Sand Point, Alaska 99661

I, George P Gundersen, would like to go on record opposing Proposal 282. I think it should not be on this agenda and it did not meet the criteria for an out-of-cycle item. We haven't been able to fish the southeastern district main and for at least six years which has not made an improvement in the Chignik area. Also the seine feet moved out of Dog in June which also showed no improvement in Chignik. I believe that Back Lake is the problem.



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March 08, 2022

Dear Board of Fish,

ADF&G continuing to aim for the bottom of the Kenai late-run king OEG has not and will not work. ADF&G must start aiming for returns at the top of the OEG. Kenai kings are the most constrained salmon species in the river. The river (and adjacent Inlet) management needs to prioritize for the most constrained stock, regardless of how user groups are affected. Prop 283 continues to focus managers on the bottom of the OEG despite the risk to the river's most constrained stock. Proposals like this one will allow continued killing of kings despite weak returns, and proposals like this one will ultimately cause the extinction of Kenai kings.

A Sidebar: It is time for the BoF to reconsider the use of traps in Alaska. They would allow for maximum harvest of targeted species like sockeyes, while eliminating non-selective harvest of non-target species, like Kenai kings. Gillnets, regardless of mesh size, catch or damage far too many non-targeted fish like kings. Traps are superior from a conservation and management standpoint.

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, or when we clearly have continued weak king returns.

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. And by the way, the bottom of the OEG doesn't seem to be producing enough returning fish to be viable. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

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. ADF&G should be aiming for the TOP of the OEG, not the bottom like they have been. The bottom of the OEG doesn't seem to be improving the king return, and Prop 283 would make things even worse by killing more kings even when Kenai king returns are obviously in an extended period of low abundance.

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 "overescapement" 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. I can't believe it was even put forward. Stay the course and protect the kings.

George Krumm

Estacada  
97023



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Good day, I'm a fourth generation Area M fisherman who is trying to make an honest living and it is getting harder and harder to accomplish this feat. We belong to a mixed stock marine fisheries that has given us the right to harvest salmon the same as other fisheries. This proposal 282 has turned into an allocation issue instead of fisheries management. Mixed stock fisheries are common in Alaska and should be protected by the Board. For example, according to WASASIP data, the sockeye fisheries in the Western and Perryville Districts in Chignik are themselves mixed-stock interception fisheries. WASSIP shows that they harvested sockeye that originated outside of Chignik. East of WASSIP and Bristol Bay sockeye made up a large portion of fish caught in these districts. The Board needs to manage fisheries on sound scientific data and not by political pressure.

Glenn Gardner





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February 16, 2022

Dear Board of Fish,

I live in Eagle River Alaska. I have fish the Kenai since 1975 and while we may never see the glory days of 70 & 80 pound kings we owe it to our children and grandchildren to try to preserve this world class fishery. Additionally kings are a huge economic engine for the Kenai peninsula. Let's be realistic; com fish already get the absolute lion's share of this limited resource.

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.

Glenn Peterson

Eagle River  
99577



March 07, 2022

Dear Board of Fish,

I live near Ottawa Ontario Canada and winter in Hudson Florida. After 31 years in the Canadian Forces I retired into two subsequent jobs. Moving with the military gave me lots of opportunities in Canada and Europe to fish. I've fished three times in Alaska, both fresh and saltwater and always the Kenai in hope of the big one!

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 support this statement even when it impacts my expensive guided trip. The stock of large kings is unique and must be preserved.

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.

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 have been impressed with the Alaska fishery management in general. If one has the ability to do an actual count and limit the harvest accordingly, why use an estimate. There's too much margin for error. Err on the side of conservation.

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. YES; DITTO

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.

I've seen the decline of sport salmon fishing in British Columbia since my first posting there in 1966. King salmon in particular now seem rare. The Kenai and the King salmon are a very special resource that I'd like to fish again.

Gordon Beech

Carleton Place  
K7C 0B1



Gordon Scott  
March 11, 2022

Box 847, Girdwood AK, 99587

907 244 7607

Comments for March 26 - April 2, 2022 Board of Fisheries Meeting

Dear Chairman Jensen and Fish Board Members

Here is a summary of my positions on various PWS Shrimp Proposals, with details following.

Proposal 237	SUPPORT	
Proposal 238	OPPOSE	
Proposal 239	OPPOSE.	suggest changing. (See below detail)
Proposal 240	SUPPORT	see note below
Proposal 241	SUPPORT	define shrimp
Proposal 242	SUPPORT	see note below
Proposal 243	SUPPORT	
Proposal 244	SUPPORT	see note below
Proposal 245	SUPPORT	see note below
Proposal 246	SUPPORT	see note below
Proposal 247	OPPOSE	.see note below
Proposal 248	OPPOSE	see note below
Proposal 249	SUPPORT	
Proposal 250	OPPOSE	see note below
Proposal 251	SUPPORT	
Proposal 252	OPPOSE	see note below

Discussion relating to PWS SHRIMP Proposals:

**Proposal 239                      OPPOSE.**

Yet I suggest changing this so that no more than the legal amount of pots allowed to fish may be carried.

The ability to carry more gear than is allowed to be fished enables illicit fishing activity, as shrimp pot gear is not required to be tended and monitored. This is a very different scenario than the oft cited analogy that you are allowed to carry more than one fishing rod. The big difference is that that fishing rod must be attended.

**Proposals 240, 242, and 246                      SUPPORT**

I suggest they need to be looked at together to find the best solution for all participants so that the Burden of conservation of the resource is shared equally. As it is now, the burden of conservation is mainly borne by the customers of the Commercial fishers.

It should be noted that there is currently a 10% burden of conservation that is already shared equally, as the Department uses the 90% confidence level of the TAH which is calculated by the surplus model. This is an excellent conservative element already in place. And there should not be a 40% penalty on top of that that is not equally shared.

All of the people of Alaska deserve access to this resource equally, as they are for other resources.



**Proposals 244 and 245      SUPPORT**

These are modeled on some provisions of the IFQ Halibut and Sablefish fisheries. These fisheries target catches are also determined annually, and this system has been working well for over 20 years.

These are proposed mainly because the current regulations in the non-commercial regulations do not allow the Department to manage the catches to the GHL. In fact those catches have been a roller coaster, with some very large percentages over GHL harvested recently, even in consecutive years since the last Board Cycle.

If these provisions are not put into place, then history has shown that this trend of significant over-harvest will repeat itself.

I welcome other ways to mandate that the Department manages this fishery within or near the GHL.

**Proposal 247      OPPOSE**

This does not allow for a slow paced and more valuable fresh marketing fishery. This would reduce the value of the current fishery. There is plenty of opportunity for anyone to participate in this open access fishery currently.

**Proposal 248 and 250      OPPOSE**

These would push the fisheries more into the egg bearing season, thereby harming the resource regeneration.

**Proposal 252      OPPOSE**

This will speed up the harvest, which will reduce the stability and value of market supply to Alaskan shrimp buyers

Thank you for the opportunity to comment, and your consideration of these positions.

Respectfully  
Gordon Scott





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February 16, 2022

Dear Board of Fish,

I live in Chugiak and have spent years making the drive down to the Kenai to go fishing. In recent years, however, my trips have become fewer and fewer. It is no longer worth the drive as the once incredible fishery has declined substantially even in the last 10 years.

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.

Grant Gullicks  
Chugiak  
99567





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March 11, 2022

Dear Board of Fish,

Save the Kings. I and other Canadian friends spend a lot of money every year to come and fish the night Kenai King Salmon. Truly best fishery when it is rolling that I know of. God Bless the Kenai and the Kings.

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?

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 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.

Grant Kuypers

Paradise Hill  
S0M 2G0



February 15, 2022

Dear Board of Fish,

I have been on the Kenai peninsula since 1985. Lowering the escapement goals is just a bad idea. I have seen first hand the demise of our once great Kenai River King Salmon Fishery. Please do not change the goals. We should be increasing them if anything to help the fishery be maintained for future generations.

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.

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 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.

Greg Andersen

Kenai  
99611

Submitted By  
Greg Brush  
Submitted On  
2/14/2022 7:31:12 AM  
Aff at on



PC211  
1 of 1

The last Board of Fish meeting heard an overwhelming and clear cry for Kenai king conservation. The people spoke, loud and clear. This was fact based and data driven: we are losing our beloved wild kings! Anyone who lives here and has fished this river for decades can see it, feel it... and the data clearly supports that sickening gut feeling. To deny this is nothing short of disgusting. For this reason, many conservative changes were made, including a "big fish protection" under 34" rule for sport anglers and adopting an OEG range. Cut sport opportunities as we lose commercial, across the board... anyone with a shred of conscious is in favor of less opportunity and more conservation. It's so important, now more than ever. No smoke and mirrors, no games; in layman terms- To a man for one "goat post" repeated year after year is a recipe for disaster. We know this. We've seen this. We are living this. Now, a Board generated proposal to allow more commercial fishing in Cook Inlet when our project is slower than ever, we haven't hit the bottom of the OEG (let alone the mid or top, where we should hit occasionally) is being considered. How sad. Please stand tall and strong against greed; be there for the resource; put sustainability first; break the cycle of neglect; represent our children; just vote NO against Ms McIntosh's Board generated proposal, giving our kings a fighting chance!!! As for me, a commercial fisherman of 34 seasons on the Kenai? You'll once again see me and mine in 18 inches of water fighting for reds this summer, instead of marjeting, selling and prostituting whatever's left of our genetically unique Kenai kings.



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February 22, 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.

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.

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.

Greg Davis  
99515





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February 15, 2022

Dear Board of Fish,

I was born in Anchorage and am 75 years old and we have a place in Poachers Cove. I have fished the river since my early 20"s when you could keep one King everyday. Now it's an anomaly if you catch one at all let alone able to keep it to eat. We need to do everything we can to preserve this run.

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.

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.

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.

Greg Svendsen

Anchorage  
99516





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February 19, 2022

Dear Board of Fish,

I live in Anchorage am 75 years old and have been fishing the Kenai fiver my whole life. Why would you consider jeopardizing the world class King salmon run on the Kenai when a sport caught fish is worth 10X more to the economy than a commercial caught fish. It has been said that each one of those Kings are worth \$1000.00 to the economy in food, gas, motel, tackle, boats, motors, cabins, guides, etc. please save them. The average set netters is making \$7500.00 a year with a few making more so the statistics say. I learned this when I spent time time during governor Walkers tenor serving on a fact finding committee formed of commercial and sports fishermen. This does not make any sense economically. Thank you.

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.

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.

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.

Greg Svendsen

Anchorage  
99516



Submitted By  
Greg Wallace  
Submitted On  
12/21/2020 12:46:28 PM  
Affiliation

Phone  
907 738 4058  
Email  
[gwbonycreek@yahoo.com](mailto:gwbonycreek@yahoo.com)  
Address  
207 M St.  
Sitka, Alaska 99835

My name is Greg Wallace. I am a Dungeness crab permit holder from Sitka.

I am submitting comments on proposal 214. I am asking for the language to include "in addition to the requirements specified in 5 AAC 32.050 a commercial Dungeness crab pot, whether circular or square with vertical sides, does not exceed 18 inches in height, a maximum outside diameter, length or width not exceeding 50 inches and a maximum volume not exceeding 35,348 cubic inches."

For points of discussion, the above stated maximum volume of 35,348 cubic inches is consistent with what is now the maximum created by the the largest legal round pot, a 18" high by 50 inch diameter pot.

I don't believe the use of square pots would be a burden on enforcement efforts, as the computation of volume for a square pot is simply length x width x height.

For comparison sake a 44 inch square pot of maximum height 18 inches has a volume of 34,848 cubic inches, very close to the maximum currently legal and a 45 inch x 45 inch x 18 inch high square pot would exceed the volume limit and be illegal.

Seventy of my 300 pots are 38"x38" x 14" high square pots. The volume only being 20,216 cubic inches. I haven't found that they outfish my round pots but they have two advantages. One significant difference is they make a much more stable stack on my deck where they can fit tightly against each other, making a safer load in rough weather. The other is that with relatively small pots hanging bats are easier kept from interfering with the door triggers.

In conclusion I don't believe there are biological or enforcement issues with the use of square pots kept within the same size constraints of the round pots.

Thank you for considering my requests.



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March 05, 2022

Dear Board of Fish,

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.

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 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.

Gregg Dunlap





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March 01, 2022

Dear Board of Fish,

Dear Board of Fisheries Members;

I am a 20 year resident of Alaska and have spent time on the Kenai river every year since I first arrived in May of 2001. I was present and gave commentary at the last Board of Fisheries meeting in Anchorage where the historic changes were enacted. I thought that there was a great amount of effort by sport fishermen, subsistence fisheries and by commercial interest at that meeting to bring about the guidelines for the various Alaska fisheries including the Kenai river kings. I hope that we can all stay the course to continue to enact needed laws to protect and regrow this amazing fish. I know it was hard this last summer for the commercial interests but this is not the time to go backward. We need to study the situation and make constructive changes to help make it possible to have fair sport fishing, subsistence and commercial fisheries. This is going to take several years of hard work to find out how to do it. Please stay the course.

Thank you;

Gregory Kisling  
Sportfisherman, Anchorage AK

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 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.

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.

Gregory Kisling

Anchorage  
99502



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February 24, 2022

Dear Board of Fish,

We live in WA state. My son & have been fishing the Kenai since 1995 for sockeye, kings & coho. Great times! The king fishing is nothing compared to what is was!

Protect that river at all costs!

H.A. & Alex Bales

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.

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.

H.A. Bales

Fife  
98424





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February 26, 2022

Dear Board of Fish,

Hello, my name is Haile Peveto. I currently live in Washington state, and am originally from Oregon. I have fished in Alaska a few times and fish up and down the west coast. Fisheries management is crucial for Alaskans because sportfishing is not only an important food source, but an economic powerhouse for the whole state. We need to rebuild the king salmon runs to support sport and commercial regardless. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? This seems illogical and against the wishes of most native Alaskans. Survival of kind salmon is what we have at risk here, please Vote NO on Proposal 283 to support the native species and show Alaskan natives and returning visitors you are listening to what is important to us!

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.

Haile Peveto

Bellingham  
98225



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March 07, 2022

Dear Board of Fish,

I live both in Seattle and in Los Angeles and like many within my sphere of influence (2 million and counting), Alaska is one of the true last frontiers and over fishing isn't helping Alaska.

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.

Hannnah Palmer

seattle  
98109



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February 17, 2022

Dear Board of Fish,

I live in Kenai River and have stopped fishing for kings on the Kenai for over 10 years because of the decline in numbers I think everyone including commercial fisherman and trawlers included should stop killing King Salmon

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.

Hans Brons

Soldotna  
99669



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February 19, 2022

Dear Board of Fish,

I am a 40 year Alaskan with a home on the Kenai River in Sterling. I have seen and enjoyed the days when 90,000 king salmon entered the river. The Kenai River king salmon species is a precious resource that we must preserve.

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.

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.

Harold Hollils

Anchorage  
99515



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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.

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.

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Harry Browning

YULEE  
32097



Dear Alaska Board of Fisheries,

I am a 12<sup>th</sup> grade student at Chignik Lagoon School of the Lake and Peninsula School District (LPSD) and I am writing to you about our local escapement. As of late, the sockeye escapement of the Chignik river has been extremely low, and it is getting increasingly harder to catch subsistence fish for our family and all the other families here in our village. Fishing is important to everyone in this village because it has been part of our cultural heritage for so long and we can't simply let this be lost. It is damaging our food security, causing severe hardships to everyone here. There has been studies that Area M is being allowed to intercept sockeye before enough escapement goes up our river, which we believe is causing a major problem for our run here.

Fishing for Sockeye has gotten especially bad since 2018 when there have been very minimal fishing openings, or even no fishing openings at all. My dad told me in 2018 that it was the first time in 100 years that we had no fishing at all, which is very shocking. The fishing business has been part of our culture ever since my grandfather was still young, and subsistence fishing has been part of our culture for even longer than that, close to a millennium. This overall is causing our heritage to wither away, and we cannot allow it to perish for good.

Our food security depends so much on our access to sockeye since it has been a part of us for so long and I don't want to imagine what would happen if we forgot the taste of fresh fish. I know that my grandmother likes to have sockeye several times a week, and if we can't catch subsistence for her, what will she do about that? The fishing business is the core reason why all of us here are able to afford living here. If there are no sockeye to catch for businesses, the businesses will stop buying fish from us here, and then the people of our village can't afford living here. That means that everyone will have to abandon the village and go live elsewhere. We cannot allow this to happen to the community.

Area M is being allowed to catch sockeye before enough escapement comes here for there to be an opening for those of us here, which is not exactly fair for us. We believe that Area M should not be allowed to catch Chignik sockeye until there is enough escapement here so we can have access to our local resource and the run will be sustained in the long term. By doing this, those of us here where I live can have an early run in and not have to wait way later for there to be an opening, or not having an opening at all during a fishing season.

We cannot allow our heritage and food security to die. Area M should be restricted from fishing for Chignik sockeye during fishing seasons. It is the only way, please help us.

Sincerely,

Henry Dustin Erickson





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February 23, 2022

Dear Board of Fish,

40 year Alaskan resident who has watched the decline of salmon, we all need to help to restore this once great fishery.

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.

Henry Garbowski



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February 25, 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.

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.

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Hunter Hahn  
Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

I grew up on the Kenai River fishing it in the 80' and 90's. I still live in the Peninsula and now make my living as a sport fishing guide on the Kenai and Kasilof Rivers. In all my years on this River, I have watched the numbers of returning Chinook Salmon dwindle. I think the wrong answer is to continually lower the escapement goal so that it can be satisfied and allow more commercial opportunity. We need to conserve this amazing resource and I think we as stewards of the resource need to held responsible for its outcome. Leave the politics out of management.. Let us manage this run conservatively so that our future anglers can partake in its return.

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.

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.

Ian Flannery

Soldotna  
99669-1792



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February 23, 2022

Dear Board of Fish,

I live in Sterling Alaska and I am a fishing guide on the Kenai river. Not sure why we would put in new rules at BOF to protect king salmon only to take them away. It's time for us to worry more about the extinction of king salmon than over escapement of sockeye!

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.

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.

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Ian McDonald

Sterling  
99672



## Review of Proposal 282 to the Alaska Board of Fisheries

Michael Tillotson, John Brandon, Calvin Lee and Greg Blair

### Executive Summary

Proposal 282 would restrict fisheries in the Dolgoi Island Area and Shumagin Islands Section. The rationale for Proposal 282 is that restrictions on the Dolgoi Island Area and Shumagin Islands Section fisheries are needed because the early run of sockeye salmon in Chignik has not met its biological escapement goal for the past four years (as discussed below, updated data show the goal was met in one of those years).

Although post-2018 escapement levels have been low by recent standards, early-run Chignik River sockeye salmon have also experienced periods with low escapement in years past, and in all but a few of those low escapement years the subsequent returns were above replacement. Indeed, ADF&G's preliminary 2022 forecasts predict the early-run of Chignik River sockeye salmon will be 639,000, which would allow for the midpoint of the biological escapement goal (400,000 fish) to be met with a harvest of 239,000 fish.

The Dolgoi Island Area and Shumagin Islands Section fisheries are mixed-stock fisheries that harvest fish from multiple runs of salmon. Like other mixed-stock fisheries, which are prevalent in Alaska, their impact on any one stock (including a weak stock) is buffered by the presence of other stocks. Since 2018 there has been no direct correlation between recent harvest levels in the Dolgoi Island Area and Shumagin Islands Section and low escapement of early-run Chignik River sockeye salmon.

The best available evidence indicates that the most likely cause of the recent low escapements for the early run of Chignik River sockeye are anomalous ocean temperatures. The freshwater habitat of the Chignik River system appears to remain productive. Thus, it is reasonable to expect that, as anomalous ocean temperatures abate, run sizes and escapements will rebound. Out-of-cycle management changes to the mixed-stock fisheries in the Dolgoi Island and Shumagin Island Areas are not warranted under these circumstances.

Proposal 282's restrictions would be imposed if the Department does not expect the early run of Chignik River sockeye to meet the midpoint (400,000 fish) of the current biological escapement goal, which is based on a range of escapement levels estimated to result in the maximum sustained harvest yield. A retrospective analysis of the effects of Proposal 282, had it been in effect over the past 10 years, shows that it would have triggered effort restrictions in the Dolgoi Island Area and Shumagin Islands Section fisheries in seven years of those years. The proposed restrictions would not have been necessary in retrospect to satisfy the lower range of the escapement goal (350,000) in three out of seven years when the midpoint goal was not met during 2011–2021. And of the four years during the last decade in which the early run of Chignik sockeye salmon did not reach the lower range of its escapement goal, the benefits under Proposal 282 would have been insufficient to have met that goal in all but one year.

The restrictions Proposal 282 would impose on the Dolgoi Island and Shumagin Island Area fisheries would have a far greater cost in terms of reduced harvests in those fisheries than benefits in terms of increased escapements for the early run of Chignik River sockeye. On average, our retrospective analysis shows that the costs would outweigh the benefits by about 15 to 1.



Salmon populations are inherently dynamic and subject to fluctuations in run sizes. These population fluctuations can vary on time scales ranging from interdecadal to centennial scales (Rogers et al. 2013). Many factors have been linked to variability in salmon populations. For example, different life history characteristics and environmental conditions in spawning habitat can affect salmon populations. (Braun and Reynolds 2014). Additionally, climate patterns in the North Pacific Ocean have correlated with historically sharp increases and decreases in salmon populations (Mantua et al. 1997). Anomalous warm ocean conditions led to a marine heatwave in the Northeast Pacific from 2014 to 2016 and even more recently from 2018 to 2019 (Amaya et al. 2021; Litow et al. 2020). The ecological effects of the marine heat wave have been documented at multiple trophic levels ranging from plankton to forage fish and top marine predators (Arimitsu et al. 2021, Batten et al. 2021; Rogers et al. 2021; Suryan et al. 2021). Sockeye salmon (*Oncorhynchus nerka*) were affected in various ways from altered food webs, changed migration patterns, and increased competition with other salmon species (Cheung and Fröllicher 2020; Connors et al. 2020; Fergusson et al. 2020; Yasumiishi et al. 2020). Variability in abundance of salmon populations can cause disparate harvest rates on different salmon runs from year to year in mixed stock fisheries common in Alaska. Harvests from mixed stock fisheries contain different proportions of salmon runs from year to year (Dann et al. 2012). Evaluating the effects of mixed stock harvests on multiple salmon runs is difficult without accurate genetic data to differentiate between different salmon runs, particularly for smaller stocks/populations (Connors et al. 2019). Models have been developed to utilize genetic stock identification alongside age composition data to provide estimates of population composition (Cunningham et al. 2018). Other models have been developed that indicate mixed stock fisheries have limited effects on stocks of concern when the proportion of that stock is small; the influence and effects on that stock are diluted by the presence of other stocks in the fishery (Lloyd 1996). These tools and methods provide important information in mixed stock fisheries when there is concern about a particular run.

## Introduction

The authors are members of ICF's Fish and Aquatic Sciences Team. ICF is an international consulting firm with expertise in fisheries science and management (among other fields of expertise). ICF was retained by the Area M Seiners Association to evaluate Proposal 282 before the Alaska Board of Fisheries. Dr. Michael Tillotson is a Senior Fisheries Biologist at ICF specializing in salmon ecology, evolution, and population dynamics. He has studied population-level responses to environmental change in both Pacific and Atlantic salmon ranging from Northern California to Western Greenland, including extensive experience with sockeye salmon in Western Alaska. Dr. Tillotson obtained his PhD from the University of Washington during which time he spent multiple field seasons studying salmon in the watersheds of Bristol Bay. Dr. John Brandon is a Senior Biometrician at ICF. His background is in population dynamics modeling, fisheries stock assessment and management strategy evaluation, with a PhD from the University of Washington. Calvin Lee is a Senior Biologist at ICF. His background is in population genetics and fisheries monitoring, with an MS from the Estuarine and Ocean Science Center at San Francisco State University. Greg Blair is a Senior Fisheries Biologist at ICF. His background is in salmonid population assessments, management, and habitat evaluation and restoration planning, with an MS from the University of Washington. During his time with the University of Washington he was the project lead for the Kvichak research project for the Fisheries Research Institute.

## Author affiliation and background



Recently, Chignik River Sockeye salmon, which is comprised of a genetically distinct early run and a late run, has been of particular concern due to low returns (Ross 2021; Creelman et al. 2011). The most recent data from the Alaska Department of Fish and Game indicate that the early run met or exceeded the minimum biological escapement goal (BEG, 350,000 – 450,000 fish) in two of the last five years (2017 and 2019)<sup>1</sup>.

The Alaska Board of Fisheries policy defines a salmon fishery as a “conservation concern” when the stock is unable to meet a sustained escapement threshold (SET) over a four-to-five-year period (Policy for the management of sustainable salmon fisheries 5 AAC 39.222(f)(6)). It is important to note a SET limit would be lower than the lower bound of the BEG (5 AAC 39.222(f)(39)), because the SET is a limit related to conservation, and the BEG is an estimate used to manage escapement for maximum sustained harvest yield. We are not aware of a SET level having been determined for early-run Chignik River sockeye salmon but given the historical spawner-recruit data presented in the first section below, there is no indication that recent escapement levels have been consistently below a threshold that would present a conservation concern.

Two hypotheses related to environmental and habitat conditions have emerged as possible reasons for recent low returns. First, changes in freshwater habitat have been evaluated as affecting out-migrating smolts (e.g. Ruggerone, 2003). Second, recent climate events such as the marine heat wave have altered ocean conditions for salmon and may have affected marine survival. A third hypothesis relates to removals through harvest having depressed returns in recent years.

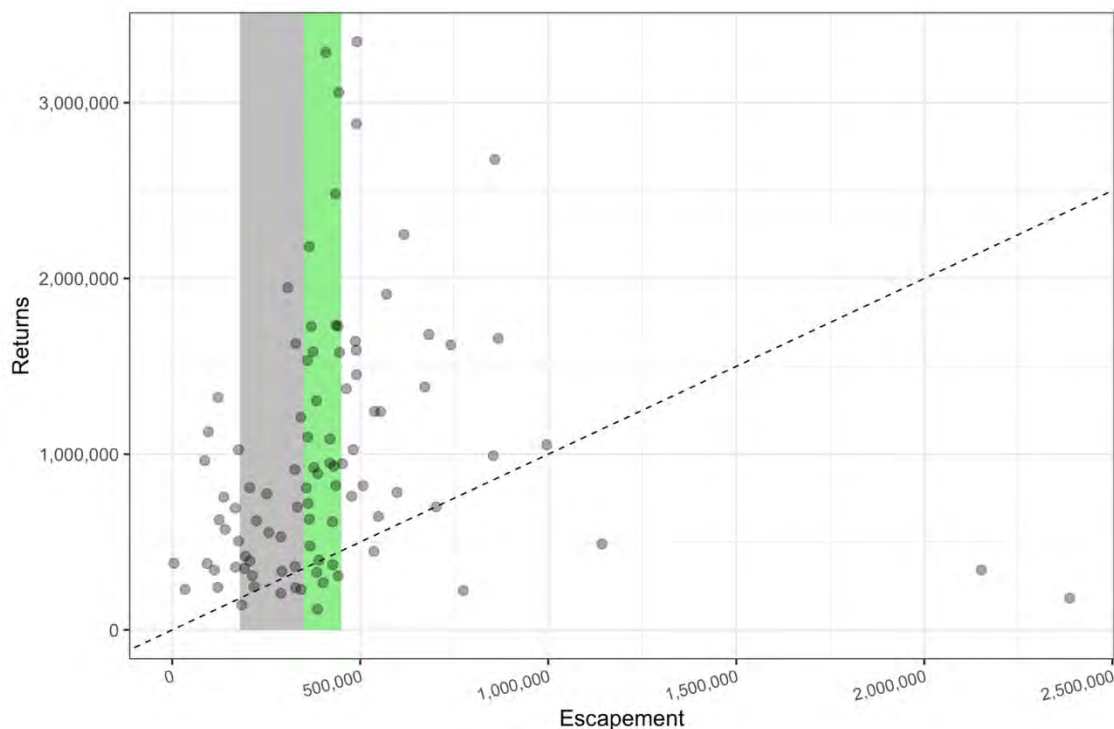
In this comment we use data from early-run (Black Lake) and late-run (Chignik Lake) Chignik River sockeye salmon to evaluate the effect of freshwater habitat on smolt abundance and/or quality as a possible hypothesis for low run sizes in recent years. We also evaluate evidence for changes in marine conditions as a factor for low returns, as well as how harvest levels in the Dolgoi Island Area and Shumagin Islands Section compare to Chignik River sockeye salmon returns since 2011. At the end of this comment, we provide a retrospective cost benefit analysis. This examines how the restrictions on fishing effort under Proposal 282 would have affected the sockeye salmon harvest in the Dolgoi Island Area and Shumagin Islands Section during the last decade and compares the reduction in harvest for those areas to the escapement benefit for early-run Chignik River sockeye salmon.

## Previous years with escapement levels below the BEG

Estimates of escapement and subsequent returns (i.e., spawner-recruit data) are available for early-run Chignik River sockeye salmon during 1922–2015 (Appendix B3 in Schaberg et al. 2019; Schaberg *pers. comm.*). Among other things, these data provide a long-term perspective that includes previous years when escapement levels were similar to those during 2018–2021. In other words, years when escapement was between 179,200 and the lower range of the current BEG (350,000; Figure 1 grey shaded area).

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<sup>1</sup> Updated brood tables from 1983 onwards used in these analyses were obtained from ADF&G (K. Schaberg *pers. comm.*). The updated early-run Chignik escapement estimate for 2019 is 379,444 sockeye salmon. The previous 2019 escapement estimate as noted in Proposal 282 was 345,918.



**Figure 1.** Escapement and returns (spawners and recruits) are shown for early-run Chignik River sockeye salmon during 1922–2015 (the last year complete returns are available). The grey shaded region shows the range of escapement corresponding with levels observed during 2018–2021 (i.e. between 179.2K and 350K). The green shaded region shows the BEG range (350–450K). The dashed line denotes the 1:1 replacement line.

Although post-2018 escapement levels have been low by recent standards, early-run Chignik River sockeye salmon have also experienced periods with low escapement in years past, and in all but a few of those low escapement years the subsequent returns were above replacement (i.e., returns were greater than the parental spawning escapement; Figure 1). These data demonstrate that early-run Chignik River sockeye salmon have exhibited resiliency in terms of compensatory recruitment in response to low escapement levels in the past. Indeed, ADF&G’s preliminary 2022 forecasts predict the early-run of Chignik River sockeye salmon will be 639,000, which would allow for the midpoint of the biological escapement goal (400,000 fish) to be met with a harvest of 239,000 fish<sup>2</sup>.

Likewise, it is important to note that the current biological escapement goals are set to achieve an escapement level that has been estimated to correspond with the greatest potential for maximum sustained yield for the harvest (e.g., Schaberg et al. 2019). So, while escapement below this goal would not be expected to result in the maximum sustained yield for the harvest, that is not the same thing as a period of escapement below the BEG necessarily resulting in early-run Chignik River sockeye salmon having fallen below a self-sustaining threshold.

Potential explanations for low early-run Chignik River sockeye salmon returns since 2018 are nevertheless of interest because Proposal 282 would link fishing effort in the Dolgoi Island Area and Shumagin Islands Section with early-run Chignik River sockeye salmon returns relative to the BEG for

<sup>2</sup> Preliminary 2022 Westward Region Salmon Forecasts, ADF&G Advisory Announcement 12/14/2021: <https://www.adfg.alaska.gov/static/applications/dfnewsrelease/1349085563.pdf>

- It has been hypothesized that the observed changes in the Black Lake watershed have reduced the productivity and/or carrying capacity for juvenile sockeye, particularly during warm years when summer water temperatures in the shallow Black Lake may exceed physiological optima (e.g. Ruggerson et al. 2003).
- The effects of these changes are hypothesized to negatively influence both the Black Lake and the Chignik Lake populations through increased competition in Chignik Lake as Black Lake fry migrate downstream to avoid unfavorable thermal conditions (Westley et al. 2008); increased competition in Chignik Lake may then lead to reduced growth with negative consequences for overwinter survival in the lake and poorer smolt quality (i.e. length, weight or condition factor).
- Ruggerson (2003) concluded that these habitat changes have affected the Chignik stock complex and in part resulted in smaller productivity gains realized by the Chignik runs relative to other Alaskan salmon populations since the 1970s.
- Direct evidence of these hypothesized impacts is limited, and more recent research (e.g. Westley et al. 2008, Griffiths et al., 2013, Walsworth et al., 2020) by the University of Washington Fisheries Research Institute (FRI), which works extensively in the watershed, has generally indicated that negative impacts are not occurring.
- For example, Walsworth et al. (2020) reported that, contrary to expectation “Our results demonstrate that, even in years where most juvenile growth for surviving individuals was accumulated in Chignik Lake, the Black Lake stock can be highly productive”.
- Unpublished data from FRI support the notion that freshwater growth conditions remain favorable for sockeye in both the Chignik and Black lakes. Sockeye fry have been sampled in each lake near the end of the summer growing season (~September 1) since the 1960s. Since 2005 the average lengths of sampled sockeye in both lakes have remained 1 to 2 mm above the long-term means (Figure 2).

### Changes in smolt quality and abundance

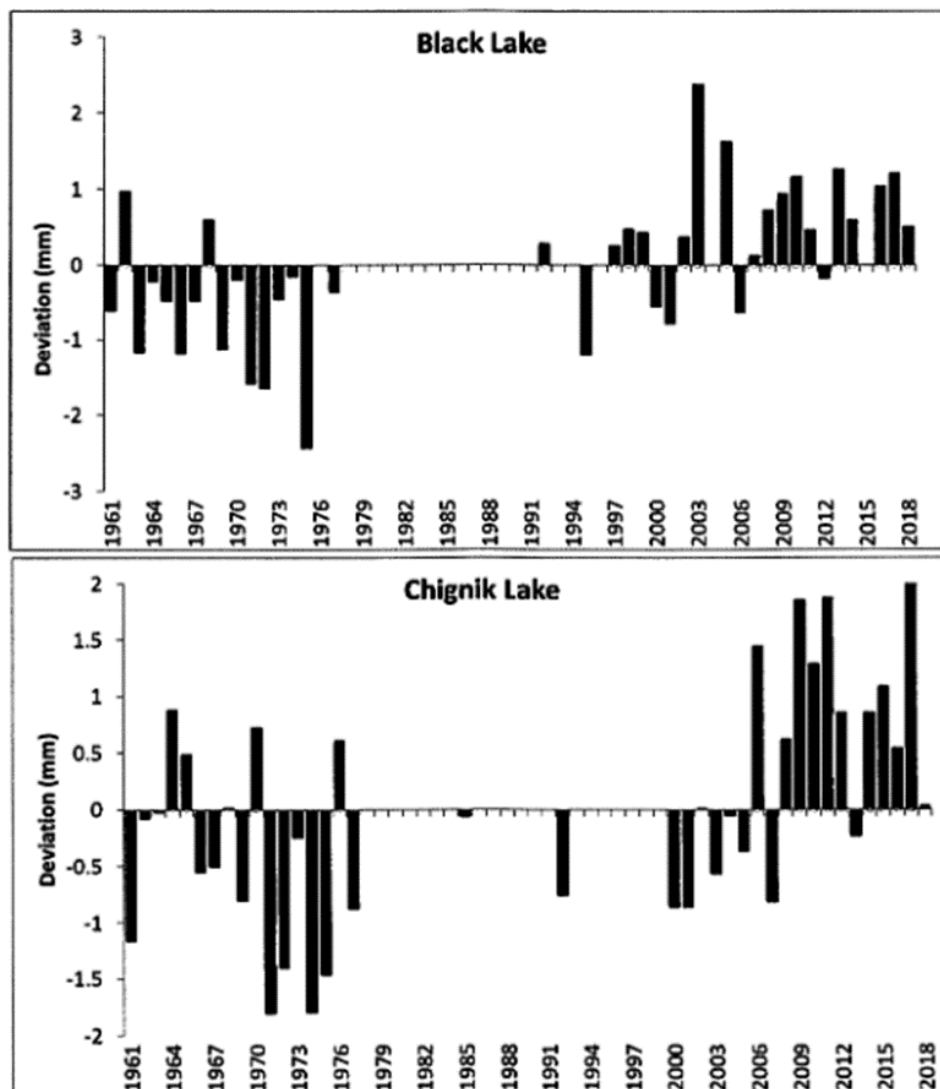
- Substantial changes in the Black Lake watershed have been documented over at least the last five decades (e.g., Ruggerson 2003). These changes have collectively reduced the depth and volume of Black Lake (Ehakeem and Papanicolaou, 2008) which may result in closer coupling of air and water temperatures.
- Additionally, in recent decades, a combination of cyclic variability and climate change have resulted in relatively warm air and water temperatures in Western Alaska (Litzow et al. 2020).
- However, in general, these warmer conditions have proven beneficial for freshwater growth and overall productivity of the region’s sockeye salmon stocks (Cline et al. 2019).

### Freshwater habitat changes

that run. The premise of the proposed restriction rules is presumably that harvest levels in the Dolgoi Island Area and the Shumagin Islands Section are a key factor in the early-run of Chignik sockeye salmon having failed to reached its BEG in recent years. Below we provide a review of alternative hypotheses that could explain recent Chignik River sockeye salmon escapement levels, including environmental and habitat conditions related to recruitment, and we also examine harvest levels in the Dolgoi Island Area and Shumagin Islands Section in recent years.



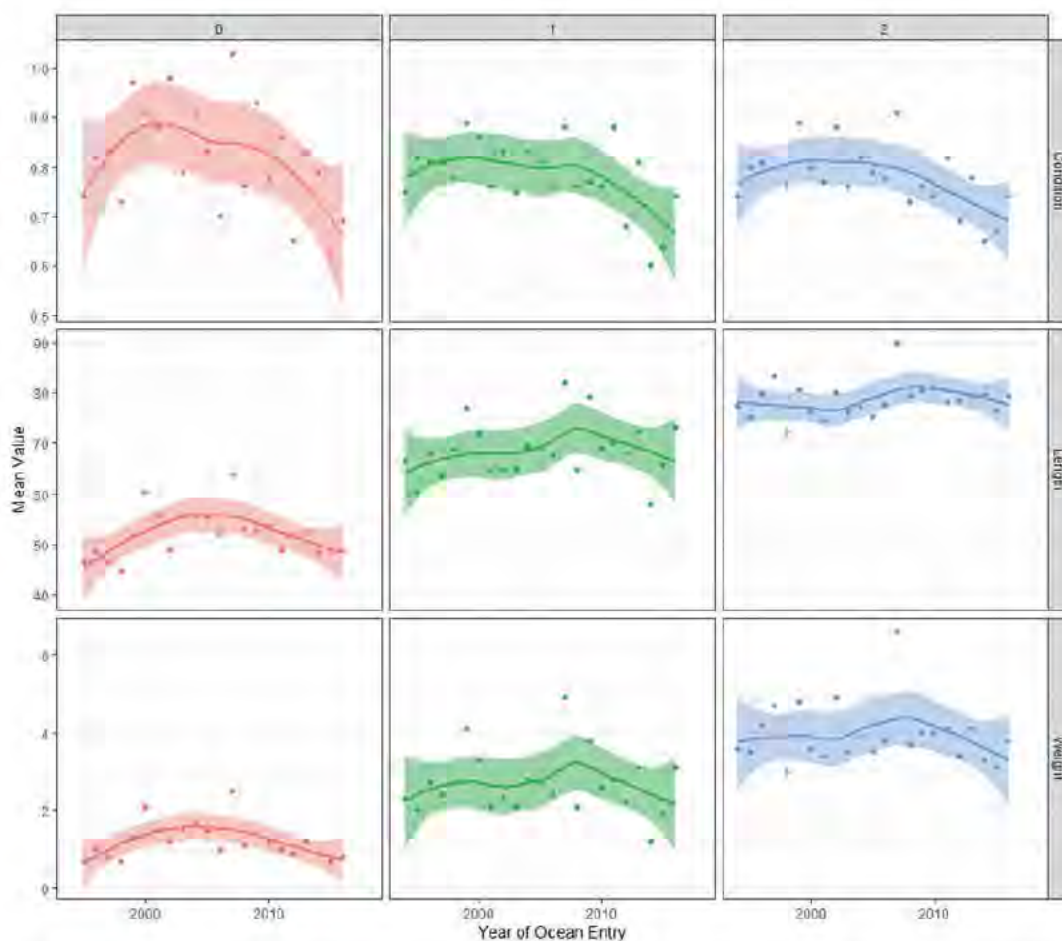




**Figure 2.** Average body sizes (fork length) of juvenile sockeye salmon caught in tow net surveys on September 1 in Chignik and Black lakes from 1961 – 2018, expressed as deviations from the long-term average (63.3mm Black Lake, 61.5mm Chignik Lake). Positive values denote better-than-average growth in that year, negative values denote worse-than-average growth in that year. Note that several years of data are missing during the 1980s and early 1990s. UW-FRI unpublished data. (Figure taken from RC47: Letter from Dr. Daniel Schindler to Alaska Board of Fisheries, February 17, 2019.)

- Separate from the FRI fry sampling, ADFG operated a smolt monitoring project between 1994 and 2016. Smolt data are from the combined outmigration of sockeye salmon from both lakes (Figure 3). Average smolt length, weight and condition factor<sup>3</sup> remained relatively stable during this period, though there is some indication of declining smolt quality since ~2012.

<sup>3</sup> The condition factor (K) is a measure of weight-to-length, where higher values represent fish that are in better body condition (i.e., less skinny), and is calculated as,  $K = (W / L^3) \cdot 10^5$

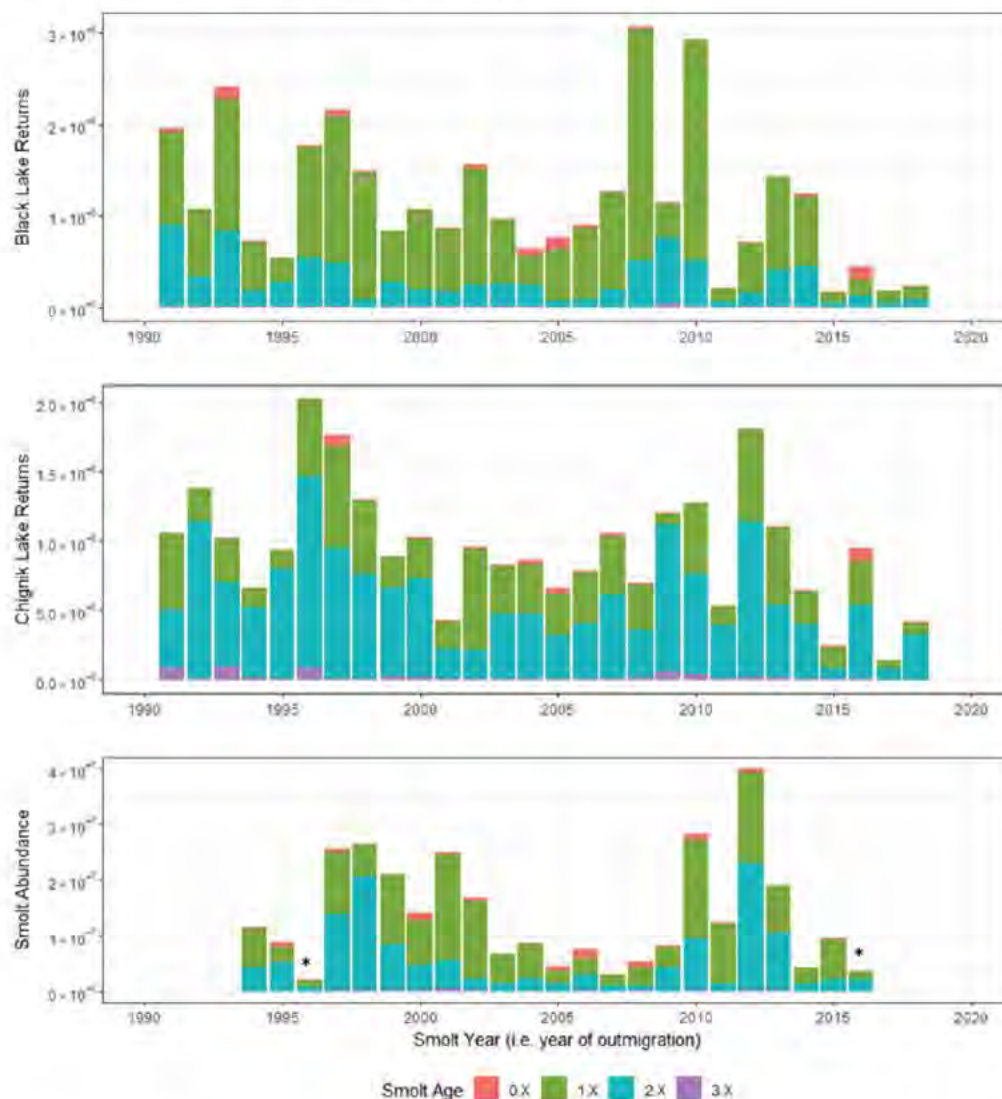


**Figure 3.** Mean length(mm), weight(g) and condition factor of Chignik smolts sampled by ADFG during outmigration; 1994-2016. Lines and shaded areas show LOWESS smoothing. Numbers in the top facets correspond with Age 0, Age 1, and Age 2 smolt.

- The FRI length data on September 1 (Figure 2) and ADFG smolt monitoring data (Figure 3) appear somewhat contradictory. The FRI data indicate larger sockeye at the end of the summer for both lakes whereas the ADFG data indicates smaller size of out-migrating smolts.
- However, a direct comparison of the FRI and ADFG data is problematic. First, the early and late runs are not distinguished during smolt enumeration, so changes in smolt quality may reflect changes in the relative abundances of two population with differential growth rates (e.g., declining size-at-age could indicate increasing prevalence of slower growing Chignik Lake smolts).
- Additionally, in many sockeye populations smolt age is negatively correlated with freshwater growth (Cline et al. 2019). Faster growing individuals may achieve a physiological threshold and initiate smolt transition, while slower growing individuals may delay migration for one or more years. This growth-migration response can lead to a counterintuitive situation where average smolt size-at-age declines in response to improved freshwater growth conditions because the largest individuals migrate to sea at younger ages (Tillotson and Quinn, 2016).
- The survival implications of such reductions in smolt age are uncertain. In many salmon populations larger smolts have been shown to experience improved marine survival. In the Kvichak River a shift from age-2 to age-1 dominance was associated with the loss of very large returns, but the population nevertheless continues to produce substantial harvestable surpluses (Rich et al., 2009; Tillotson and

Quinn, 2016). Across Bristol Bay populations climate warming has driven a trend toward dominance by age-1 smolt with no apparent negative impacts as the stock complex continues to produce record runs (Cline et al. 2019).

- With regard to low Chignik River sockeye salmon run sizes since 2018, critical years of smolt data are missing or suspect due to operational difficulties (2016<sup>4</sup>, 2017 and 2018). These smolt years would have produced returns primarily in 2018-2021.



**Figure 4.** Upper and middle panels show adult returns for Black Lake and Chignik Lake runs by age from smolt years 1990-2018; bottom panel shows combined Black Lake and Chignik Lake smolt abundances and age composition estimated based on ADFG screw trap catches for smolt years 1994-2016. Smolt enumeration reports indicate that abundance estimates in 1996 and 2016 (those years are plotted with an asterisk \*) were likely undercounts resulting from poor operating conditions for sampling equipment.

<sup>4</sup> The smolt enumeration report for 2016 reports poor sampling conditions due to heavy fouling of the traps and low catches

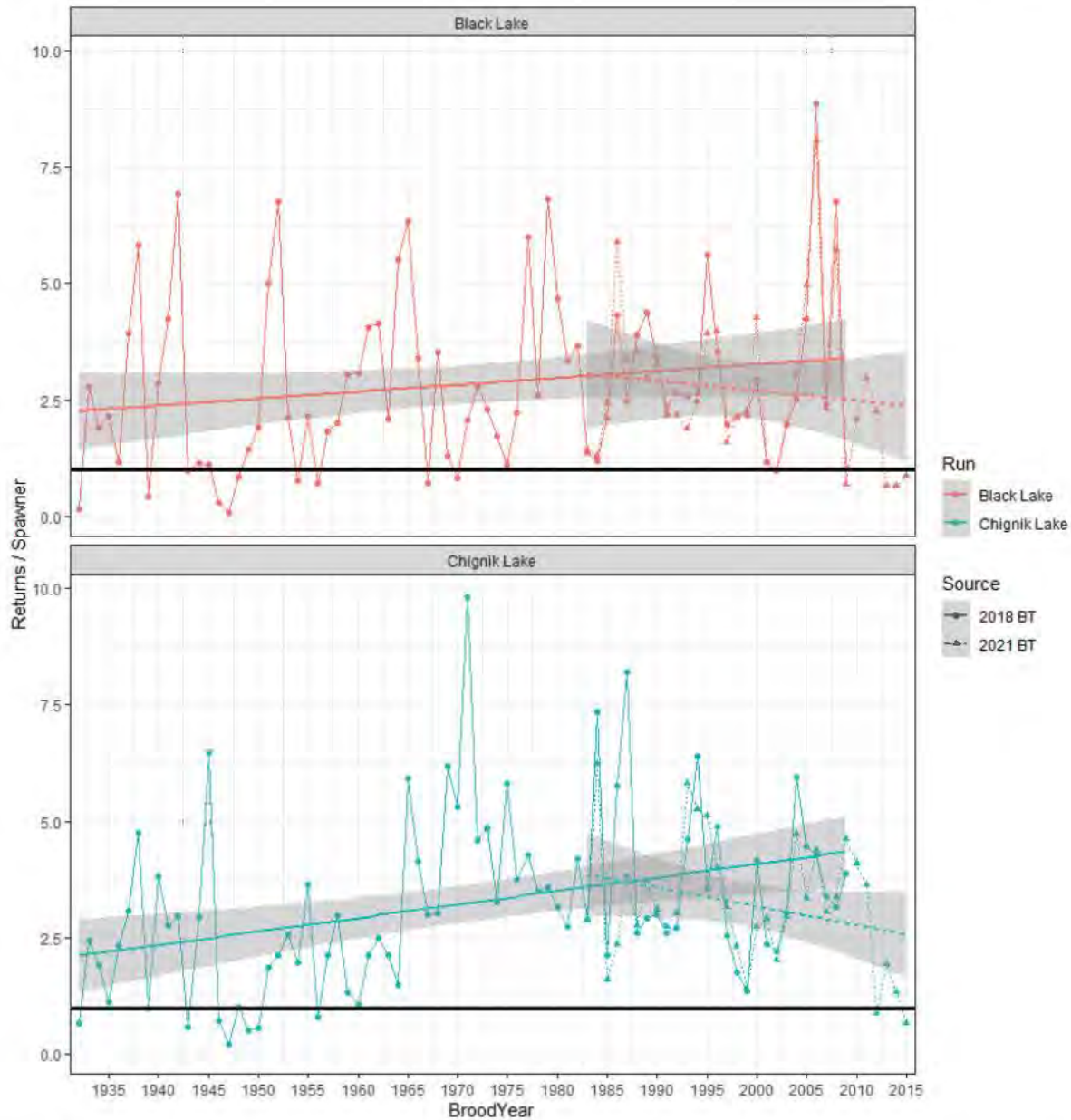


- There is no doubt that the physical habitat and geomorphology of Black Lake has experienced persistent change over multiple decades. These changes have reduced the overall volume of available rearing habitat for the Black Lake population, and also amplified the effect of warming associated with climate change and internal climate variability (i.e. the Pacific Decadal Oscillation).
- Despite these changes, available evidence suggests freshwater growth conditions have actually improved over time, and that juvenile sockeye from both populations can exhibit a range of rearing behaviors that take advantage of multiple habitats. While conditions in Black Lake may now lead to early outmigration in warm years, there is no evidence that this behavior has negative impacts on either stock. Given that growth is limited by low temperatures in Chignik Lake, increased competition for resources resulting from Black Lake fish rearing in Chignik Lake is likely to be buffered by favorable growing conditions in the recipient habitat (i.e. Chignik Lake) during warm years.
- Habitat change in Black Lake has been ongoing over multiple decades while no concurrent long-term decline has been observed in the productivity of either the Black Lake or Chignik Lake populations (Figure 5). Based on the updated brood tables, the trend in returns-per-spawner since the mid-1980s has been slightly negative, though this is driven primarily by low productivity during the four most recent brood years with complete data (2012-2015), and neither trend is statistically significant. In any case, despite substantial year-to-year variability, the long-term average productivity of both runs has remained relatively stable despite substantial habitat changes in the watershed.

### Summary and interpretation of freshwater habitat and productivity

- Smolt monitoring was reinitiated in 2019 and based on data from 2019 and 2020 the trend towards smaller smolt size has not persisted [Olson, M. (ADF&G) *unpublished data*]. However, substantial changes in sampling locations and methods (sampling moved downstream to Chignik Lagoon and fish are caught using a beach seine) confound the comparison of these data with prior results and no estimates of smolt abundance are produced from the new sampling approach.
- Data from the ADF&G Chignik smolt enumeration project indicate that the abundances of out-migrating sockeye were relatively low during 2014, 2015 and 2016, but comparable to a period of low smolt abundance that lasted from 2003-2008, years both populations had average adult returns (Figure 4). Total runs during years in which these smolt primarily returned (2005-2011) averaged over two million fish.





**Figure 5.** Returns-per-spawner (R/S) for Black Lake and Chignik Lake sockeye populations; brood years 1932-2015. Brood tables were updated in 2021, but not for the complete time-series. New data are shown separately with dashed lines and triangle markers. Revision of the previous brood tables generally resulted in minor changes in estimated R/S except for Chignik Lake in 1986 and 1987 where prior estimates appear to have been erroneously large. Shaded areas show linear trends based on the 2018 and 2021 brood tables. Bold black line shows replacement productivity.

### Evidence for changes in marine survival

- Although smolt abundances appear to have been relatively low during the most recent years with estimates (fish that would have returned primarily during 2016-2019), low adult returns since 2018 do not appear to be *primarily* a result of low freshwater productivity. Similarly low smolt migrations produced adult returns that were typically between 1.5 and 2 million during the 2003-2008 period.



- Inference is complicated by the fact that critical years of smolt data were not collected (2017 and 2018) and smolt abundances have not been estimated since 2016. However, the 2018 return was primarily composed of smolts from 2015 and 2016. Comparing the 2018 total Chignik run of ~540,000 adults to the production of smolt years 2003-2008 suggests that marine survival may have declined by sixty percent or more relative to the earlier period. The presumed undercount of smolts in 2016 suggests that this is a conservative estimate of the decline.
- Marine survival of salmon remains in many ways a black box, but there are several plausible hypotheses that could explain this apparent >60% decline in marine survival:
  1. Some characteristics of smolts (e.g. length) or their behavior (e.g. date of ocean entry) may result in unusually high mortality during or shortly after their seaward migration. This transition is commonly reported to be critical in determining overall marine survival, and mortality during this period is likely size-selective. Under this hypothesis, although mortality occurs in the marine environment it nevertheless is driven in part by freshwater conditions through their impact on growth or migration timing.
  2. A related possibility is that early marine survival has declined rapidly independent of smolt quality or phenology. For example, atypical ocean temperatures may reduce food resources during this critical transition period, or an increasing predator field may reduce the number of surviving post-smolts.
  3. Unfavorable marine environmental conditions may also have a more diffuse impact on marine survival. An atypically warm marine environment may provide fewer or less energy-dense prey resources, a novel or increased predator field and can also influence metabolism. These factors may act individually or in concert to reduce total survival during the typically 2-3 year period of marine residence.
  4. A fourth possibility related to marine survival is that the harvest rate has increased substantially on Chignik bound adult sockeye. Assuming that Area M harvest is the primary source of non-terminal harvest of Chignik sockeye, this would require either a) a large increase in the total Area M sockeye catch or b) a large increase in the proportion of the Area M catch comprised of Chignik origin fish. We investigate this possibility further below, by examining harvest levels in the Dologi Island Area and Shumagin Islands Section from 2011 to 2021.
- The lack of smolt abundance estimates after 2016 creates a substantial impediment to partitioning the relative influence of marine and freshwater influences on low Chignik sockeye returns since 2018. Nevertheless, the single return year for which the majority of contributing smolt were enumerated (2018) suggests a marked decline in marine survival relative to a period of comparable smolt production (smolt years 2003-2008, return years 2005-2011).
- A further confounding issue is the unknown origins of sampled smolts. It is not possible to fully rule out a scenario in which the production of Black Lake smolts has declined dramatically relative to the Chignik Lake. This could help to explain the relatively large decrease in overall productivity of the Black Lake population.
- Multiple interacting processes could have driven this ostensibly rapid decline in marine survival. However, apart from hypothesis 4 (i.e., substantially increased harvest in other areas), the plausible explanations are associated with a rapid shift in environmental conditions (as opposed to a long-term decline in productivity as a hypothesized consequence of Black Lake habitat changes). This is not to say that habitat conditions have played no role, but rather that their impact would have been realized

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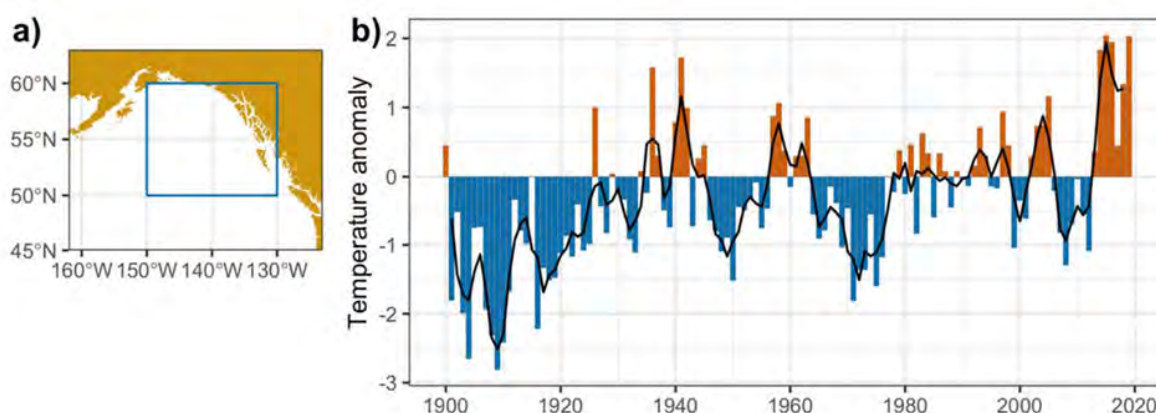


through reduced resilience to environmental extremes rather than as a direct driver of lower freshwater productivity.

- Based on these observations it is then necessary to compare the relative likelihood of two possibilities: 1) Anomalous environmental conditions were the primary driver of low Chignik sockeye returns between 2018 and 2021 or 2) a large increase in harvest of Chignik bound sockeye occurred during this period.

### Marine environment vs. Harvest as the primary driver of low Chignik returns

- The recent period of low returns of Chignik Sockeye has coincided with unprecedented climatic conditions in the Northeast Pacific. Extreme sea surface temperatures began in 2014, peaked in 2016, returned to near normal in 2017 before again returning to record highs in 2018-2019 (Figure 6, Amaya et al. 2020; Litzow et al. 2020; Walsh et al. 2017; Di Lorenzo and Mantua 2016). Peak values during the 2014-2016 event reached nearly  $2.5^{\circ}\text{C}$  above normal, and over  $2.5^{\circ}\text{C}$  in some areas during the 2018-2019 event (Amaya et al. 2020). Peak warming occurred during the summer for the 2018-2019 event versus in the winter for 2014-2016 (Amaya et al. 2020).



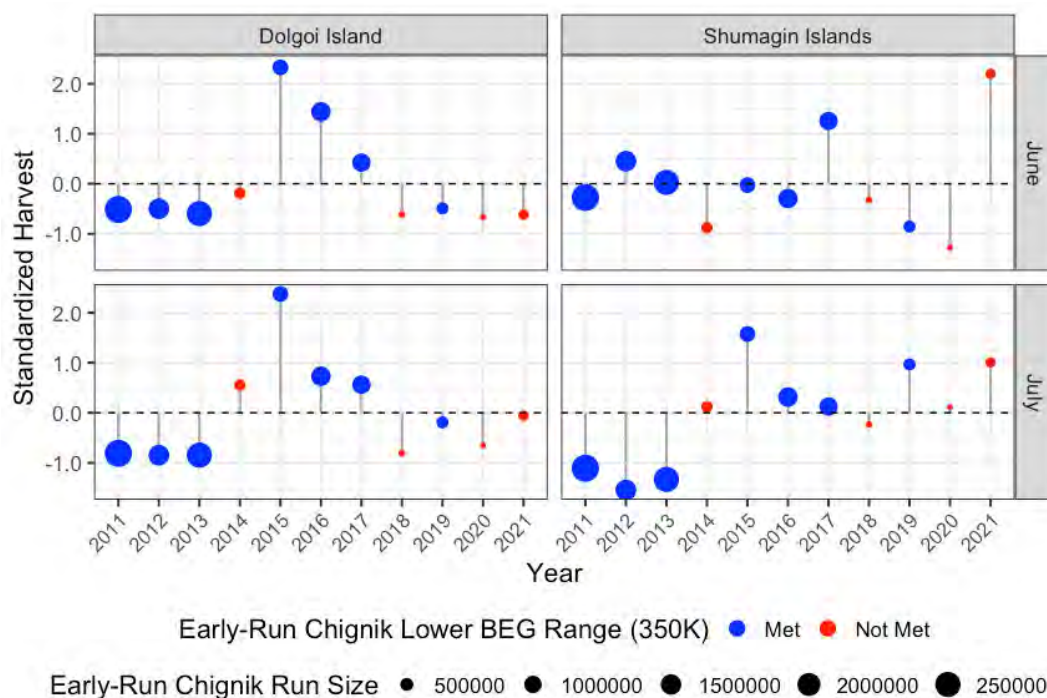
**Figure 6.** Observed Gulf of Alaska SST anomalies for comparison with preindustrial simulations. a) Area in the Gulf of Alaska for which observations and simulations are compared. b) Time series of area-weighted annual anomalies from ERSSTv5. Black line plots three-year running mean anomalies. Taken from Litzow et al. (2020).

- Sea surface temperature anomalies in the Gulf of Alaska have not only been exceptionally high, but this condition has also persisted across multiple years.
- The 2016 smolt year stands out as rather anomalous for several reasons. First, in the context of this low-productivity period, the adult returns produced by 2016 smolt were relatively large (especially for the Chignik Lake population, where total adults produced was above the long-term average). This likely in part reflects the extent of the 2016 smolt undercount, but the age composition of this smolt year was also atypical, with a large proportion of returning adults having been age-0 smolts.
- The 2017 return to more typical GoA SST may in part explain the more typical production of Chignik sockeye from the 2016 smolt year.
- A stated goal of Proposal 282 is that *“This proposal links fishing time in the Shumagin Islands and Dolgoi Islands Area to sockeye salmon escapement to the Chignik River.”* As described above, harvest in the Shumagin Islands Section and Dolgoi Island Area is composed of multiple stocks of salmon, with the proportion of Chignik River sockeye in the harvest varying by month and year in

each area (Dann et al. 2012). Here, we examine two possible hypotheses for the recent and rapid reduction in early-run Chignik River sockeye salmon escapement that involve the Dolgoi and Shumagin Islands harvest. Each of these hypotheses assumes that, since at least 2006–2008, the Dolgoi and Shumagin Islands harvest has been removing Chignik River sockeye salmon, but that something related to the harvest has changed in terms of its effect on Chignik River sockeye salmon escapement in recent years.

- One hypothesis is that the proportion of early-run Chignik River sockeye salmon in the Dolgoi and Shumagin Islands harvest has increased since 2018. Under this hypothesis, even if the total annual sockeye harvest in these areas had not increased, removals of Chignik River sockeye salmon would have nevertheless increased, which could have consequently depressed the escapement of those runs in recent years. We are not aware of any updated stock composition estimates since the WASSIP 2006–2008 study, however, that could be used to evaluate this hypothesis. Hence, this hypothesis cannot be ruled out, but it seems unlikely that there would have been a substantial increase in the proportion of early-run Chignik River sockeye salmon in the Dolgoi and Shumagin Islands harvest since 2018, given record high Bristol Bay sockeye salmon runs in recent years.
- A second hypothesis is that harvest levels in the Dolgoi and Shumagin Islands areas have been higher than average in recent years. Under an assumption that the proportion of Chignik River sockeye in the harvest has not decreased since 2006–2008, higher than average harvest levels during 2018–2021 would have resulted in more early-run Chignik River sockeye being removed in these areas than in previous years, depressing escapement to some degree. Unlike the hypothesis that the proportion of the harvest composed of the runs of Chignik River sockeye salmon has increased, it is possible to examine whether overall harvest levels in the Dolgoi and Shumagin Islands have been higher than average during recent years. Figure 7 shows the standardized harvest levels during 2011–2021 in these areas during June and July. From 2018 to 2021, when early-run Chignik River sockeye escapement was below the midpoint of the BEG, the sockeye salmon harvests in the Dolgoi Island Area were below their 2011–2021 average harvest level (Figure 7). Therefore, the below average harvest levels in the Dolgoi Island Area during 2018–2021 would be expected to have removed *fewer* early-run Chignik River sockeye salmon than usual since 2011, assuming the June and July proportion of the Dolgoi harvest that is composed of early-run Chignik River sockeye salmon remained constant on average.
- The Shumagin Islands harvest since 2018 was more variable with respect to its average level over the last decade compared to the Dolgoi Island Area (Figure 7), but there is no clear pattern between harvest levels in the Shumagin Islands and early-run Chignik River sockeye salmon escapement since 2018. For example, in 2018 and 2020, the years with lowest early-run Chignik River sockeye salmon escapement, the Shumagin Islands sockeye harvest was either below or approximately equal to its average 2011–2021 level in both June and July.



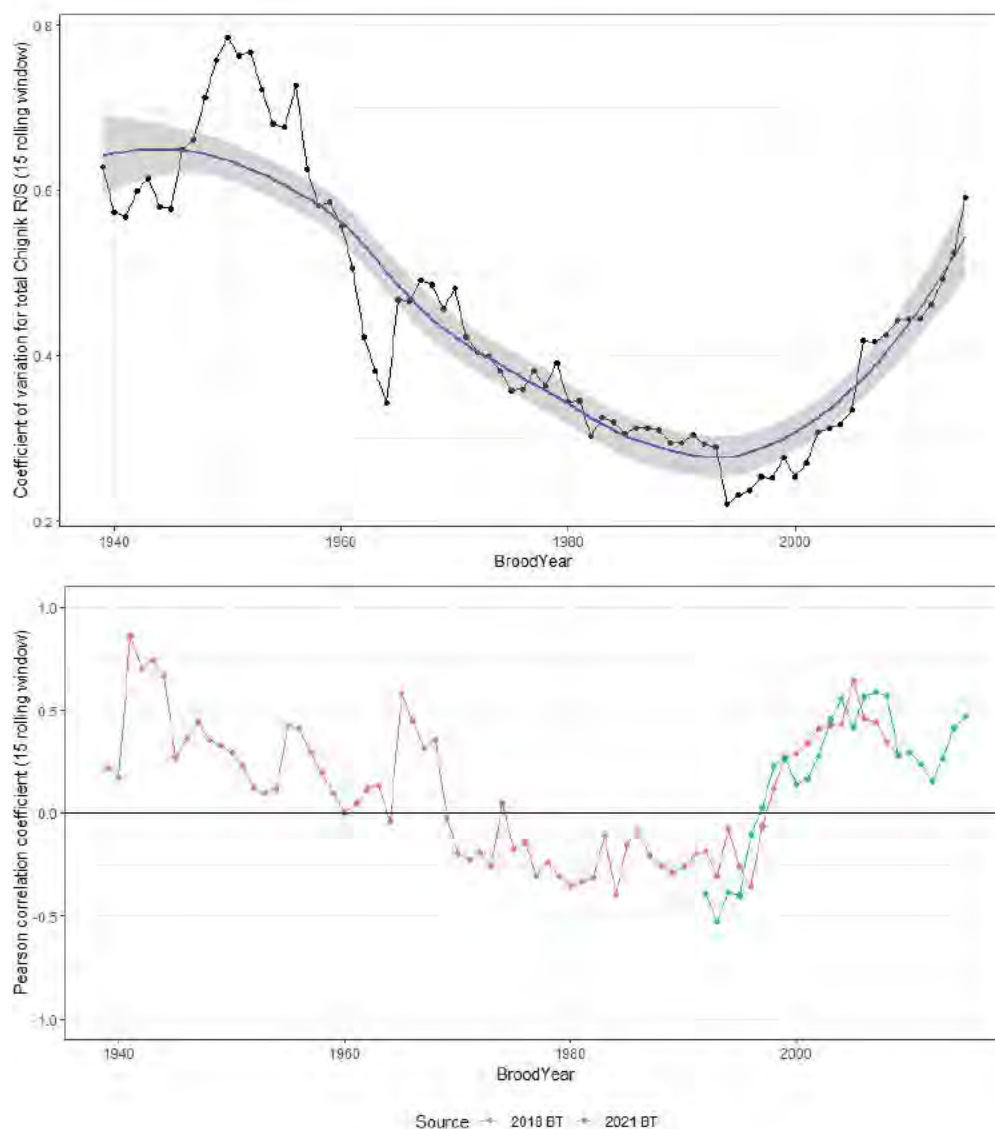


**Figure 7.** Harvest levels in the Dolgoi and Shumagin Islands are shown by month and across years during 2011–2021. Harvest levels are scaled (normalized) to the average annual harvest over that time period: A standardized harvest value of zero on the y-axes represents the average sockeye salmon harvest in an area-month stratum during 2011–2021; negative values are below average sockeye salmon harvest and positive values are above average sockeye salmon harvest in an area-month stratum. The size of the points is plotted relative to the early-run Chignik River sockeye salmon run size that year. Smaller points represent years with smaller relative run sizes during the last decade, and vice-versa. The point colors represent whether the lower range of the BEG (350,000) for early-run Chignik River sockeye was met or not each year.

### Synchrony and variability of Chignik sockeye

- It is now well established that diversity within salmon populations and their habitats provides resilience against environmental change and reduces interannual variability in abundance through the “portfolio effect” (Hilborn et al. 2003; Schindler et al. 2010; Brennan et al. 2019).
- The diversity that underlies the portfolio effect is manifest across many scales, and each Chignik run is composed of unique spawning populations which exploit multiple rearing habitats. As such, each population no doubt benefits from its own life-history diversity and the substantially intact habitats of the watershed.
- However, at the population level the Chignik portfolio is relatively weak. If productivity is highly synchronous between the early and late runs then the year-to-year variation in the Chignik stock complex should be relatively large. If the populations are asynchronous, then the highs and lows of each should counteract one another, dampening variability.





**Figure 8.** Time-series of variability and correlation in the productivity of Chignik sockeye, brood years 1939-2015. Top panel shows the coefficient of variation of recruits/spawner for a backward-looking, rolling 15-year rolling window. Blue line and shaded area show LOWESS smoothing. Bottom panel shows the Pearson correlation coefficient between Chignik Lake and Black Lake recruits/spawner over a backward-looking, 15-year rolling window.

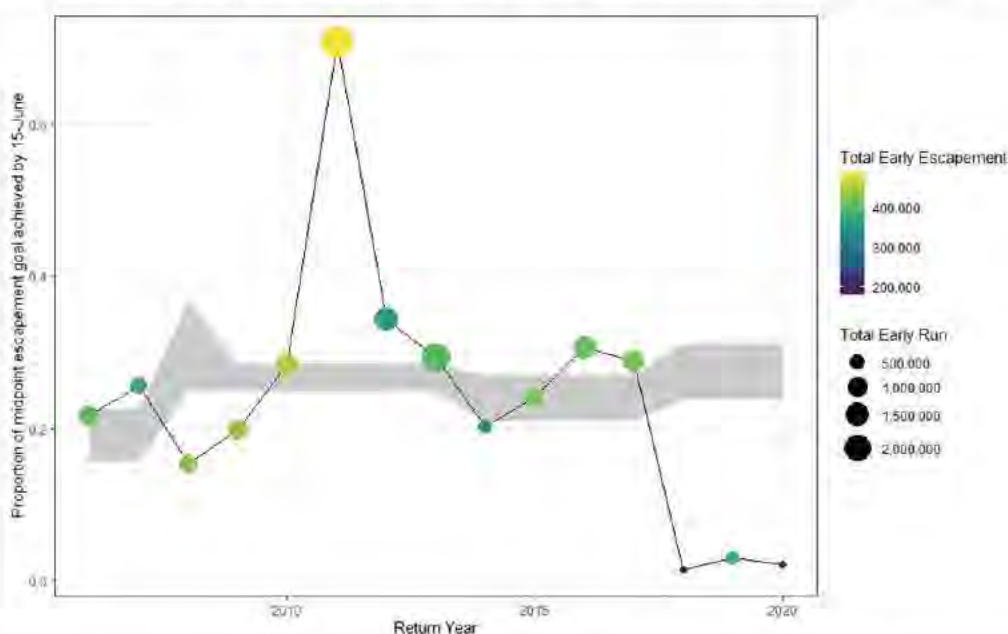
- Correlation, either positive or negative, between the two runs could feasibly arise from either mechanistic or stochastic processes. A negative correlation could reflect competition for freshwater resources, while a positive correlation could reflect the synchronizing effect of a common marine environment.
- While the mechanisms that drive the relationship between the Black Lake and Chignik Lake sockeye productivity are no doubt relevant and interesting, they are also beyond the scope of this evaluation. However, the existence of positive correlation in productivity, regardless of its source, provides important context for interpreting the recent period of low returns.



- Examination of the correlation between Black Lake and Chignik Lake productivity, and the interannual variability in the productivity of the stock complex indicates that the populations have been relatively synchronous since ~2000 and that variability, measured as the 15-year coefficient of variation, has been increasing over this period (Figure 8).
- These findings do not provide an explanation for the root cause of recent low returns, but rather indicate that the potential for very small or very large returns has increased relative to a period between 1970 and the mid-1990s where the stocks' productivity was weakly, negatively correlated and interannual variability was rather low.

### Evaluation of June 15<sup>th</sup> date as indicator of run size and return timing

- The proposed rule would take effect based on whether the Black Lake run is expected to achieve its midpoint escapement goal as evaluated on June 15<sup>th</sup>. The specifics of this "expectation" are not defined, but it seems reasonable to assume that this may be based on observed escapement relative to ADFG interim sockeye escapement targets. The interim escapement target for Jun 15<sup>th</sup> is ~25-30% of the early run midpoint escapement goal.
- From 2006 through 2017 at least 15% of the midpoint had been achieved by June 15<sup>th</sup>, and all years except 2008 and 2009 had achieved the lower interim target by this date (Figure 9). Even in 2014 when both the total Black Lake run and escapement were relatively low, more than 20% of the midpoint had been counted by June 15<sup>th</sup>.
- Since 2018 less than 5% of the midpoint had been achieved by June 15<sup>th</sup>, even in 2019 where total run and escapement were comparable to 2014.
- It is unclear whether the small escapements observed by June 15<sup>th</sup> in recent seasons are a result of small overall run sizes, or if it may be in part influenced by shifts in run timing. The proposed regulation would be highly sensitive to run timing, and so additional evaluation seems warranted.



**Figure 9.** Proportion of annual Early Run midpoint escapement goal achieved by Jun 15<sup>th</sup> for return years 2006-2020. Shaded area shows the interim escapement target range on June 15<sup>th</sup> as a proportion of the midpoint escapement goal (400,000). Point size and color indicate the total early run escapement and run size, respectively.

## Retrospective cost-benefit analysis of Proposal 282 restrictions on the Dolgoi and Shumagin Islands sockeye salmon harvest during 2011-2021

Proposal 282 would restrict fishing in the Shumagin Islands Section and Dolgoi Island Area from June 15 to July 25 unless the Department expects the mid-point of the biological escapement goal range for the early-run of Chignik River sockeye to be met or until the first commercial salmon opening in the Chignik Management Area.

This analysis applies Proposal 282's restrictions retrospectively to available harvest and escapement data during 2011–2021. The June and July proportions of early-run Chignik River sockeye salmon in the Dolgoi Islands Area and Shumagin Islands Section harvests are extrapolated to 2011–2021 from the WASSIP stock composition estimates from 2006–2008 (Dann et al. 2012).

Four questions are addressed: (1) What would the average annual loss of harvest have been in the Dolgoi Island Area and Shumagin Islands Section under the proposed restrictions for those years during 2011–2021 when the midpoint escapement goal for early-run Chignik River sockeye salmon was not met? (2) In the same set of years, what would the resulting escapement benefit of the proposed restrictions have been to early-run Chignik River sockeye salmon? (3) In those years, did early-run Chignik River sockeye salmon meet the lower range of the biological escapement goal (350,000) and, if not, would the escapement benefit from the proposed restrictions have been sufficient to meet the lower range of the biological escapement goal? (4) Likewise, in those years, what was the cost-benefit ratio measured in terms of annual loss of harvest in the Dolgoi Island Area and Shumagin Islands Section versus the escapement benefit to early-run Chignik River sockeye salmon?

### Data and Assumptions:

- Annual June and July harvest numbers during 2011-2021 are from Tables 282-1 and 282-2 in ADF&G comment RC2 (ADF&G 2022).
- Likewise, whether the midpoint escapement goal was reached, or not, for early-run Chignik River sockeye salmon each year during 2011–2021 ADF&G comment RC2 Table 282-5 (ADF&G 2022).
- Only years during 2011–2021 where midpoint escapement was *not* met were included in the analysis.
- Updated estimates of annual escapement, harvest and run size for early-run Chignik River sockeye salmon were obtained from ADF&G (K. Schaberg *pers. comm.*).
- June and July stock composition estimates for the harvest in the Dolgoi Island and Shumagin Islands areas were from the WASSIP study (Appendix D1-D6 and E1-E8 of Dann et al. 2012).
  - The expected proportions of the harvest in each area composed of early-run Chignik River sockeye salmon was estimated by fitting a mixed-effects logistic regression to the stock composition proportions across temporal (e.g. weekly) WASSIP sampling periods during 2006–2008. Two independent regression models were fit to estimate the expected proportion of early-run Chignik River sockeye salmon in each area.
  - The form of the regression in the *R* computing language for each area was:

$$p \sim month + (1 | year)$$

- Where: *p* corresponds to the mean of the estimated proportion of early-run Chignik River sockeye salmon during a temporal sampling period in an area (i.e. depending if regression was being fit to the proportions for Dolgoi or Shumagin Islands), during a given *month* (i.e. June or July) in that area, and *year* was treated as a random effect on the expected proportion of early-run Chignik River sockeye salmon in the harvest for that area-month stratum.

- The number of assigned early-run Chignik River sockeye salmon was assumed to be a binomially distributed random variate, given the number of genetic samples in each temporal sampling period and the corresponding mean of the estimated stock composition proportion for that sampling period. WASSIP samples collected during August were excluded from the analysis.
- The resulting estimates were found to be similar in value to a global average proportion calculated across years for the time-period samples in a given area-month stratum. Unlike a simple average proportion approach, however, the estimates from this mixed-effects regression account for the correlation in estimated proportions between samples from each area within a given year.
- Reductions in fishing effort under Proposal 282 followed the interpretation of ADF&G (Figures 282-6 and 282-7 in RC 2). The calculations in this analysis assumed that midpoint escapement was not expected to be met in June or July, and hence the full reduction in fishing hours would have occurred in the Shumagin Islands Section and Dolgoi Island Area. In June, the total allowable fishing time was assumed to be reduced from 416hrs to 272hrs (65.4% of fully allowed effort). In July allowable fishing time was assumed to be reduced from 249hrs to 126hrs (50.6% of fully allowed effort). The percentage of resulting harvest was assumed to be equal to the percentage reduction in fishing time (e.g., June harvest under the full restrictions was assumed to be 65.4% of the harvest that month).

### Results and Conclusions

The estimated proportions of early-run Chignik sockeye salmon for the area-month strata that were used in the analyses are shown in Table 1. The results for harvest-escapement loss-benefit calculations for the area-month strata are shown in Table 2. The estimated escapement benefits resulting from the proposed harvest restrictions in the Shumagin Islands Section were generally similar in magnitude to those from the Dolgoi Island Area, but the harvest lost under the restrictions would have been substantially larger on average in the Shumagin Islands Section.

**Table 1:** Expected proportions ( $p$ ) of early-run Chignik River sockeye salmon by area-month harvest stratum based on the regression fit to WASSIP stock composition assignments.

Area	Month	Estimated Proportion of Early-Run Chignik Sockeye in the Harvest ( $p$ )
Shumagin Islands	June	0.057
Shumagin Islands	July	0.040
Dolgoi Island	June	0.409
Dolgoi Island	July	0.139

**Table 2:** Intermediate calculations showing the escapement benefits for early-run Chignik River sockeye salmon by area-month stratum in each year that did not meet the midpoint escapement goal during 2011–2021. The expected proportion ( $p$ ) of early-run Chignik River sockeye salmon in the harvest for each area-month stratum follows Table 1. Harvest is the reported sockeye salmon harvest (all runs) for each area-month stratum in each year. Restricted time is the fraction of fishing time allowed under Proposal 282 in each area-month stratum. Restricted harvest is calculated as the product of Harvest and Restricted time. Harvest lost is the difference between Harvest and Restricted harvest. Escapement benefit is the product of Harvest lost and  $p$ .

Year	Area	Month	$p$	Harvest	Restricted time	Restricted harvest	Harvest lost	Escapement benefit
2012	Dolgoi	June	0.409	29,900	0.654	19,550	10,350	4,233
2012	Dolgoi	July	0.139	36,700	0.506	18,571	18,129	2,526
2013	Dolgoi	June	0.409	14,411	0.654	9,423	4,988	2,040
2013	Dolgoi	July	0.139	36,993	0.506	18,719	18,274	2,546
2014	Dolgoi	June	0.409	79,488	0.654	51,973	27,515	11,253
2014	Dolgoi	July	0.139	242,039	0.506	122,478	119,561	16,657
2018	Dolgoi	June	0.409	11,941	0.654	7,808	4,133	1,690
2018	Dolgoi	July	0.139	42,698	0.506	21,606	21,092	2,938
2019	Dolgoi	June	0.409	30,993	0.654	20,265	10,728	4,388
2019	Dolgoi	July	0.139	132,835	0.506	67,218	65,617	9,142
2020	Dolgoi	June	0.409	2,521	0.654	1,648	873	357
2020	Dolgoi	July	0.139	65,765	0.506	33,279	32,486	4,526
2021	Dolgoi	June	0.409	10,830	0.654	7,081	3,749	1,533
2021	Dolgoi	July	0.139	152,496	0.506	77,167	75,329	10,495
2012	Shumagin	June	0.057	641,213	0.654	419,255	221,958	12,717
2012	Shumagin	July	0.040	120,063	0.506	60,755	59,308	2,386
2013	Shumagin	June	0.057	513,513	0.654	335,758	177,754	10,184
2013	Shumagin	July	0.040	154,953	0.506	78,410	76,543	3,079
2014	Shumagin	June	0.057	239,482	0.654	156,584	82,898	4,749
2014	Shumagin	July	0.040	395,465	0.506	200,115	195,350	7,859
2018	Shumagin	June	0.057	406,806	0.654	265,989	140,817	8,068
2018	Shumagin	July	0.040	337,209	0.506	170,636	166,573	6,702
2019	Shumagin	June	0.057	246,419	0.654	161,120	85,299	4,887
2019	Shumagin	July	0.040	534,937	0.506	270,691	264,246	10,631
2020	Shumagin	June	0.057	118,596	0.654	77,544	41,052	2,352
2020	Shumagin	July	0.040	393,403	0.506	199,071	194,332	7,818
2021	Shumagin	June	0.057	1,168,998	0.654	764,345	404,653	23,184
2021	Shumagin	July	0.040	541,694	0.506	274,110	267,584	10,765

The results aggregated across areas and months are shown for each year in Table 3. The average annual harvest lost was 398,742 sockeye salmon in the Shumagin Islands Section and Dolgoi Island Area combined. The average early-run Chignik River sockeye salmon escapement benefit was calculated as the product of the harvest lost and the proportion of that number that is expected to be composed of early-run Chignik River sockeye salmon. This assumes that all early-run Chignik River sockeye salmon that were not harvested would have survived and returned to Black Lake to be counted towards the biological escapement goal that year. The annual escapement benefit under Proposal 282 would have averaged 27,101 additional early-run Chignik River sockeye salmon per year.

**Table 3:** Combined Dolgoi and Shumagin Islands sockeye salmon harvest and resulting early-run Chignik River sockeye salmon escapement benefits are shown by year, with the restricted harvest level and harvest lost under Proposal 282. The “Minimum BEG met”, and “Minimum BEG met with benefit” columns show whether the lower range of the BEG (350,000) was met in a given year, and whether the escapement benefit from the proposed effort restrictions on the Dolgoi and Shumagin Islands harvests would have resulted in escapement having reached the lower range of the BEG for each year.

Year	Harvest	Restricted harvest	Harvest Lost	Early-run escapement benefit	Early-run escapement <sup>a</sup>	Early-run escapement with benefit	Minimum BEG met?	Minimum BEG met with benefit?
2012	827,876	518,131	309,745	21,862	356,513	378,375	Yes	Yes
2013	719,870	442,310	277,559	17,849	401,052	418,901	Yes	Yes
2014	956,474	531,150	425,324	40,518	342,404	382,922	No	Yes
2018	798,654	466,039	332,615	19,398	182,991	202,389	No	No
2019	945,184	519,294	425,890	29,048	379,444	408,492	Yes	Yes
2020	580,285	311,542	268,743	15,053	179,200	194,253	No	No
2021	1,874,018	1,122,703	751,315	45,977	296,033	342,010	No	No
Average	957,480	558,738	398,742	27,101				

a. Previously 2013 escapement for early-run Chignik River sockeye salmon were estimated to have been below the midpoint (400,000) of the BEG. It seems likely therefore that the in-season restrictions under Proposal 282 would have been triggered during 2013, and that year is retained in these analyses. Given the updated escapement estimates, however, the 2013 run is now estimated to have reached the midpoint of the BEG.

From 2011 to 2021, the early run of Chignik River sockeye salmon did not meet the midpoint of the current biological escapement goal range (400,000 sockeye) in seven years. The proposed restrictions would not have been necessary in retrospect to satisfy the lower range of the escapement goal (350,000) in three out of those seven years. And of the four years during 2011–2021 in which the early run did not reach the lower range of its escapement goal, the benefits under Proposal 282 would have been insufficient to have met that goal in all but one year. The cost-benefit ratio from Proposal 282 would have been 398,742 sockeye salmon lost on average to the Dolgoi and Shumagin Islands harvest vs. 27,101 additional early-run Chignik River sockeye salmon benefitting escapement per year, or a cost-benefit ratio of approximately 15 to 1 (Table 3).



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Submitted By  
ILIA KUZMIN  
Submitted On  
3/9/2022 1:02:04 PM  
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Homer, Alaska 99603

Hello Mr. Chair and board members my name is ILIA KUZMIN and I'm a permit holder in the Kodiak tanner crab fishery. I would like to ask the board to move the opening date from January 15th to February 1st. There are 2 reasons that affect my ability to go fishing on time and 1. For the past years the cold weather in Homer freezes the harbor and it's hard to get out of the harbor 2. Weather is usually better beginning of February. So please consider my request and change the opening date to February 1st...



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Greetings to all concerned:

From: Jack & Barbra Donachy

To: Alaska Board of Fisheries  
Board Support Section

March 11, 2022

Re: Proposal 282 - Chignik River Salmon and Intercept Fisheries.

Greetings to all:

My wife, Barbra Donachy, and I moved to Chignik Lake in the summer of 2016. Having consistently read and been told that the state of Alaska uses science to manage its salmon runs, we have been shocked and dismayed upon studying how the Chignik run is managed to learn that any notion that “science” is informing run management is a fiction.

An intercept fishery, by its very nature, cannot be supported by data. Board managers confirm this when instead of offering scientific rationale for permitting the interception of Chignik River salmon they reference “tradition” and observe that Area M fishermen “already own boats.”

It should be pointed out that Chignik area fishermen also “already own boats,” and residents here have been relying on the subsistence harvest of Chignik River salmon for untold generations prior to Area M commercially intercepting Chignik River fish.

The other tiresome, unscientific rationale presented again and again by the Board of Fisheries and its associate ADFG biologists is that “we really don’t know what’s causing low salmon returns” to the Chignik River. Of course you don’t know. Simply counting fish at the Chignik River Weir is not the same thing as studying the run. In order to make an honest scientific study, the Board and biologists would need to begin by paring down variables affecting the run. While it’s true that some variables are beyond human control, the most obvious factor the Board and biologists could and *should* control for is the intercept fishery: suspend it until a better understanding of what is impacting the Chignik’s salmon runs can be determined.

**From a purely scientific viewpoint, *all* commercial salmon fisheries should be operated**





**as terminal fisheries.**

As to economics, while maintaining the nonscientific status quo benefits fishermen further down the peninsula, it is having a *catastrophic* impact on Chignik fishermen, our communities, and our families. A further point is this: Area M fishermen are taking salmon while they are still growing. A terminal fishery, located in the waters near the Chignik River, would ensure that A) salmon are being harvested at their maximum weight and maximum economic value, B) that escapement goals could be far more accurately managed, and C) that commercial processing/packing plants would have a consistent economic incentive to maintain a viable presence in Chignik Bay.

Barbra and I would like the Board to begin managing the Chignik Run based on science.

We support Proposal 282 as a step toward a more science-based approach.

Sincerely,  
Chignik Lake Residents Jack & Barbra Donachy

**Jack Donachy**  
**Chignik Lake, Alaska**



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February 17, 2022

Dear Board of Fish,

Lower the escapement for a year and study the results.

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.

Jack Rogers

Castle Dale  
84513



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February 16, 2022

Dear Board of Fish,

I live and work on the Kenai river, and this measure is extremely concerning. Our Kenai river king salmon are already facing a serious decline, and this proposition would allow for even more incidentally caught kings. All this supports is greed.

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?

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.

Jacquelyn Bowman

Cooper Landing  
99572



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February 22, 2022

Dear Board of Fish,

I'm from Minnesota and actually have never visited Alaska; however, I have numerous friends that have left to move to Alaska for the fishing and outdoor possibilities.. I believe extending the commerical fishery will greatly impact not just your tourism but also your future residents that are deciding to move to your state. I hope you take this into consideration.

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.

Jake Blong



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

Subject: Support for Proposal 282

Dear Alaska Board of Fisheries,

Can you help protect our sockeye run? I think it's very important to note that there are no salmon streams that are being monitored for escapement in the Shumagin Island Section and Dolgoi Island Area and the fish they are catching are bound for the Chignik River where the escapement goal is not being met. This modification will greatly improve the chances of meeting the escapement goals in the Chignik Management Area which in turn will protect the sustainability of our Salmon run, not just for the profitability of commercial harvesters but also, more importantly, to conserve the culture and subsistence capabilities of the communities and maintain the balance of the salmon ecosystem. I would like the Alaska Board of Fisheries to approve Proposal 282.

Thank you,

James Anderson  
City Council Member  
Box 86  
Chignik, AK 99564





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February 17, 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.

James Connell

Marcola  
97454



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March 11, 2022

Dear Board of Fish,

I m a 20 year Air Force veteran in 1962 I and my family were assigned to ELmendorf AFB after 2 four 4 Yrs I retired in 1975. I hired on with ALASCOM for 20Yrs. I lived in ANC. Retired in 1991 from ALASCOM. I moved Sterling Ak on the Kenai river. I have fished the Kenai for 60 years. The last 15 years has been a disaster King returns below minimum levels. I have had to buy my King a year from a out state commercial fisherman living on Kbeach Rd in the summer. The Board needs to do their job manage the fishery and ( stop) the Kenai River commercial fishing. Sincerely Jim.

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.

James Fena

Sterling  
Sterling  
99672



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February 22, 2022

Dear Board of Fish,

My brothers and I started a salmon sport fishing guide service on the Kenai River in 1978. Fishing was wonderful in the late "70's" into the "80's". In the "80's" emergency fishing by the Central District commercial fishermen became commonplace. Limited Entry was implemented in 1972 to prevent over harvest, as was the case in the "50's" until the "crash" that came in the early "60's". Allowing commercial fisheries to fish twice a week can sustain a fishery. However, in the "80's & 90's" the use of continuous commercial fishing periods proved to be a great way to produce another "salmon crash" on the Kenai and Kasilof Rivers. Now you want to lower king salmon escapement numbers with Proposal 283 so commercial fisheries can get more emergency fishing time. Apparently greed amongst the commercial fisheries is very difficult to control! ADF&G's incompetence even has produced poor escapement levels for the sockeye salmon, which is largely due to allowing too much emergency fishing periods.

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.

James Johnson

SOLDOTNA,  
99669



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March 10, 2022

Dear Board of Fish,

Please bring this fishery back to what it was in its glory days. Packed hotels, restaurants, and all local businesses thrived during the king season.

The greater good has to be protecting our local economy.

James Nelson

Sterling, Alaska

Resident for 35 years

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.

James Nelson

Sterling

99672



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March 09, 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 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.

James Schwanke

Kenai  
99611





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February 23, 2022

Dear Board of Fish,

Though I am not a resident of your great state, I have been fishing the Kenai River off and on for almost 20 years. I have seen the king population at it's highest and now at it's worst. I have seen the river choked by the commercial fisherman where no sockeye are coming into the river. I have spent two weeks fishing kings and never landing one. You can give reasons for that but we all know the commercial fisherman have decimated the population. As a fisherman of the Kenai and someone who lives Alaska, please don't vote to give any more power or put any commercial fisherman anywhere near 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.

James White

Butler  
41006



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February 18, 2022

Dear Board of Fish,

If this Kenai fishery continues on the politically driven path chosen by commercial interests not only fisherman and charter operations the past twenty years, soon there will never be large Kenai kings nor a king run! The entire king salmon fishery in the state needs to be protected and that may involve closing polluck fishing which kills more kings than anything! Managing these fisheries should be a priority void from political and economic interests

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.

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.

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.

James Yassick



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March 02, 2022

Dear Board of Fish,

Lowering the escapement numbers for Kings I am completely against.

If the Department of fish and game would outlaw catch and release in the Kenai river, then I may have a different opinion but, so many people don't realize how long it takes to revive a king salmon after being fought out and then released immediately which I see most people do. Kings take a long time to revive after being caught and netted. The survival rate on catch and release is extremely low. If you want to guard the escapement numbers of kings, just close it down! Just because catch and release still brings people to the area to Fish, certainly does not help the survival rate. Thank you.

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.

Jamie Lyons

Kenai  
99611



Submitted By  
James Wurtz  
Submitted On  
3/9/2022 6:54:15 PM  
Affidavit

Phone  
2067699063  
Email  
[wurtzfisher@gmail.com](mailto:wurtzfisher@gmail.com)  
Address  
1368 Chuckanut Dr  
Bellevue, Washington 98005

As a young aspiring fisherman who has only recently been able to invest in my own boat and license I am greatly concerned about the Board and Departments potential to reduce time and remove area from our fishery. I have been fishing Area M since 2008 in the summer salmon fishery as well as winter cod and crab but more recently my primary source of income and the passion keeps me working in this area is the salmon fishery.

In the time I have spent in and around Sandpoint and Knap Cove I have grown a huge amount of respect for the local fishermen and their efforts to maintain a healthy and environmentally responsible industry, fishing here is the lifeblood of the community, every year people look expectantly towards the salmon fishery as the most important and community driven aspect of the summers. It is in the lifeblood, the long days, working together with your family, sharing salmon with your neighbors and community members. This has not been a new tradition in Area M and False Pass but goes back generations before statehood as the primary way to prepare for a good sustenance to the community that we have here year round.

Historically there has not been evidence that these mixed stock fisheries have adversely affected any stock of fish despite multiple management plans by the Board over the past decades. In fact the very attribute of multiple stock means there is a significant protective buffer against any one weak stock.

Alaska has a way maintained that mixed-stock marine fisheries, opened in waters where salmon grow to maturity, have as much right to harvest as fisheries opened in streams where salmon originate. Salmon are common property that belong to everyone, not just those situated near salmon freshwater habitat. There is no priority allocation for stakeholders closer to the stream or origin of salmon stocks. Mixed stock fisheries are far more common in Alaska than single stock terminal fisheries and should be recognized and protected by the Board.

Proposition 282 is about allocation, not conservation. When returns to Chignik are unusually low, the Department can use its emergency order authority, as it did in 2018 and 2020, to restrict Area M harvests in an attempt to protect Chignik runs. Given that authority, there is no conservation need to alter the Area M management plans in an out-of-cycle meeting, especially given the Department forecast that the Chignik runs will meet the escapement goals and allow for significant commercial harvests in Chignik in 2022.

Historically the Board has taken significant actions to reduce multiple fisheries in an effort to increase runs to Chignik primarily targeting Kodiak and Area M fishermen as well as in 2018 and 2020 the department took emergency order actions to further restrict Dog Is and Shumagin Is and area fisheries. These actions failed to lead to corresponding increases in Back Lake returns and without valid scientific data to back up these actions making significant improvements to the Chignik returns.

If you follow the data from the WASSIP studies the proportion of the harvest impact in 2006 and 2007 was in the Dog Is and Area (14.5% in 2006 and 4.7% in 2007), which has led the Board and the Department to impose significant restrictions on that fishery. The proportion of the total Back Lake run harvested in the Shumagin Is and Area was 7.0% in 2006, 3.7% in 2007 and 4.7% in 2008. These harvest rates, which, according to WASSIP, were based high, are in line with those the Board has previously determined do not present conservation or allocation concerns.

Chignik fishermen have long blamed fisheries in other areas for problems with the fisheries, including fisheries in Cape Igvak, the Southeast District Mainland, the Shumagin Is and the Dog Is and Area and have persuaded the Board and the Department to impose significant restrictions on these fisheries. However, those restrictions have not coincided with increased returns to Chignik. For example, in 2019 and 2020, harvest in the June Shumagin Is and Dog Is and Area fisheries were well below average, yet the

returns to Back Lake were still depressed. In 2020, the June Shumagin Is and fishery harvested only 118,596 sockeye and the June Dog Is and fishery harvested only 2,521 sockeye. The low returns to Back Lake that year cannot be attributed to these low harvests. Notably, the decline in Back Lake run sizes coincided with a long-term decline in the overall condition of out-migrating Chignik sockeye smolts from 2007 to 2016, to the lowest levels since at least 1993 (see Chignik River System Sockeye Salmon Smolt Sampling Report, 2019-2020 at page 24, Figure 7), and anomalous ocean conditions. The decline in smolt conditions may have been associated with habitat degradation; according to the Chignik Aquaculture Association's Mission Statement, Back Lake has experienced a loss of substantial lake volume and an net tributary, the Alec (Scow) River, has been re-routed to where circulation, nutrient input, and fry access into the main basin are compromised. Fortunately, the Department's 2019 and 2020 smolt study showed a significant improvement in the condition of out-migrating smolts (d.) and the anomalous ocean conditions have abated, which might help explain the Department's forecast of 2022 Back Lake returns well above its escapement goal range. The evidence as a whole strongly suggests that recent low Back Lake run sizes resulted from a combination of unusually poor smolt conditions and an unusual ocean environment rather than intercept fisheries.

The real driver for the Shumagin Is and June fishery is the availability of Bristol Bay sockeye, which experienced both a record run size and ocean conditions that resulted in the availability in the Shumagin Is and fishery in 2021. As fishermen, we can distinguish summer, west-migrating Bristol Bay sockeye, in 2021 our catch was overwhelmingly comprised of Bristol Bay sockeye. This is consistent with WASSIP data; in 2007 and 2008, when Bristol Bay sockeye contributed between 73.9% and 89.4% of our harvests, the Back Lake run contributed only 0.2% to 4.7%.

Because ADF&G has the ability to close area and reduce fishing time in the event of an emergency I think it is not prudent to make changes to the current fishing schedule and allocation until there has been enough time to do a thorough analysis and review corresponding data.

A decision that will affect so many people's livelihoods should be given a thorough vetting. This can be established during the previously designated 2023 meeting schedule when at the same time there will be a full review of Chignik management, harvest opportunities, escapement sockeye runs. Any pressing need to act in 2022 as opposed to during the next cycle meeting in 2023 is weakened by ADF&G's forecast that Chignik runs will meet escapement in 2022. The Department's preliminary forecast for Chignik is for an early run of 639,000, with escapement of 400,000 and harvest of 239,000.

Thank you for listening to our fishermen and their concerns, I hope to have a healthy and prosperous summer and with the best for all of our Alaskan fishermen statewide.

Thanks – Jamie and Ma Wurtz

F/V Paragon, Silver Bay Fisherman in Area M





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February 16, 2022

Dear Board of Fish,

I live in Utah. Salmon is an important part of my diet and I want plenty of salmon for generations to come.

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.

Janae Frazer  
Bluffdale  
84065



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February 22, 2022

Dear Board of Fish,

Harvesting as a way to get to abundance makes no sense- practically or economically.

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.

Jane Holtan

Brainerd  
56401



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February 19, 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. This is not in the best interest of the fishery.

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.

Janelle Manion

Kenai  
99611



Jason D. Alexander  
213 Airport Road  
P.O. Box 69  
Chignik, AK 99564

January 4, 2022

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

Subject: Support Proposal # 282 (ACR 7)

Dear Alaska Board of Fisheries Members:

As a 40 plus year Chignik commercial fisherman, who has experienced fluctuations in Chignik sockeye runs, never have I seen such a continuation of runs failures as currently occurring. Chignik's the early and late runs are in serious trouble. Since 2018, the early run has repeatedly failed to reach minimum escapement (350K) or even close to the 400K level set by the Department for a commercial fishery.

When Chignik is not achieving escapement in June and July, the Shumagins and the Dolgoi islands should be reduced to less fishing time. These are known harvest areas for migrating Chignik-bound sockeye salmon.

Escapement goals are a priority for run sustainability and MSY, and escapement requirements across fishing areas are to be shared proportionately. Passing Proposal 282 would go a long ways toward ensuring Chignik escapement is reached on poor run years.

Undoubtedly Area M fishermen in the Shumagins and the Dolgoi area would like the Board to make no changes to their current fishing schedule in the Shumagins and Dolgoi area regardless of the impact on the Chignik runs. If the shoe was on the other foot, they might think differently. If Bristol Bay stocks as an aggregate were not meeting escapement goals would the Board permit the south side of Area M to continue to harvest irrespective---probably not. Area M should be required to lessen its impact on Chignik bound sockeye salmon when Chignik escapement deficiencies arise.

I support Proposal 282 and respectfully ask the Board to do likewise.

Thank you

Respectfully,

Jason Alexander



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March 10, 2022

Dear Board of Fish,

I've lived on the Kenai Peninsula for the past 41 years. I used to fish the Kenai with my dad when I was young and the fish were plentiful. Now I hardly fish it at all. I've watched the steady decline on our king salmon and I'm disappointed that my son will never know what the river used to produce.

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.

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.

Jason Avigo

Soldotna  
99669





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February 18, 2022

Dear Board of Fish,

While I am not a resident of Alaska, I have travelled to your beautiful state for its world class salmon fishery several times over the past decade. Even when I don't have a trip planned, I stay apprised on the fishing conditions via reports from the Alaska Department of Fish and Game. And those king salmon reports -- and harvest restrictions -- give me pause when I think about Proposal 283.

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 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?

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.

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Jason HALE

LITTLETON  
01460

Email address: jayhalepal@aol.com  
Phone number: 16177925543



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February 17, 2022

Dear Board of Fish,

I like to fish down on the kenai.

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.

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.

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.

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.

Jason Hasegawa

Anchorage  
99507



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March 09, 2022

Dear Board of Fish,

I have been fishing the Kenai and Kasilof Rivers for the past 30 years. It high time to put the king's first and the sport and commercial fishing interest second. This proposition is nothing short of being irresponsible with proper management of the resource. It makes perfect sense to let the fish show up before the commercial fisheries use the set nests on the east side. It also makes sense for sport fishing not to take place or at a minimum catch and release until the lower end escapement goal has been met. Please do not let prop 283 pass the fisheries can't take any more abuse.

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.

Jeff Bressler

Kasilof  
99610



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February 15, 2022

Dear Board of Fish,

I'm a resident of the Kenai peninsula, I fish the rivers and bays year round. I moved to Alaska to enjoy these amazing fisheries, that include the Kenai King Salmon, I have seen first hand the effects of bycatch on the kings on Kenai and Kasilof rivers. I believe the negative impacts of that far outweigh the benefits of additional red salmon harvest. Give them a chance to recover.

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.

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.

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.

Jeff Hodges

Fritz Creek  
99603



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February 18, 2022

Dear Board of Fish,

Please do not pass this. This is not management. Follow the science.

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.

Jeffrey Johnson

Anchorage  
99507





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February 16, 2022

Dear Board of Fish,

I live in Kenai and do most of my fishing on the Kenai River. It's a travesty how the board has let the Kenai King run become so decimated over the years . This fishery needs to be shut down.

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 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.

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Jeffrey Pfile

Kenai  
99611



Submitted By  
jeffrey sherman  
Submitted On  
3/9/2022 10:44:29 AM  
Aff at on

Phone  
5035102575

Ema  
[sherman@askaheart.com](mailto:sherman@askaheart.com)

Address  
2400 TAGALAK DR  
ANCHORAGE, Alaska 99504

Please keep the regulations tight for commercial fishing in Cook Inlet. Do not lower the escapement goals for the Kenai King Salmon. The only way to get Kenai King Salmon to spawn in the rivers is to let them get to the spawning grounds. Get the nets out of Cook Inlet or they will go on to end up in Puget Sound.



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March 07, 2022

Dear Board of Fish,

I live in Seattle and Miami but Fish all over the world but primarily in Alaska. MANY of my close friends are commercial fisherman in Alaska as are similar friends in Canada - how do you feel if we support Canada over fishing like your are proposing?! Don't be ignorant don't rob Peter (tourism) to pay Paul (commercial). DO NOT EXTEND COMMERCIAL FISHING OR I WILL DO EVERYTHING I CAN TO NOT FISH IN ALASKA.

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.

Jeffrey Valcik

Seattle  
98109

To Whom It May Concern:

I am writing to support Proposal 282. I am a Registered Dietitian Nutritionist that works and lives in Chignik Lagoon. Food security is a huge issue especially in rural Alaska. There is no store here and we either must have our groceries flown down from Anchorage or King Salmon or barged up from Seattle. This is not sustainable. All families that live in the Chignik Area, use Chignik fish to keep food on the table during our long winter months. Without this fish run, we struggle to keep our families fed. This is why I support Proposal 282. I would like to see ADF&G as well as Board of Fish members do even more with conservation to help our weak fish runs and to restore a strong fishery so our children have the same opportunities to provide for their families as so many generations before them have.

Thank you for your time,

Jennie Grunert, RDN, LD, CDCES

Registered Dietitian Nutritionist, Licensed Diabetes Care and Education Specialist





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February 15, 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.

Jennifer Greene

Anchorage  
99502





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February 16, 2022

Dear Board of Fish,

I'm a 28 year Alaskan and have raised a family here. Fishing the Kenai kings was a part of my kids upbringing. I have not fished for kings in years because of the low numbers. Please protect the resource for my grandkids to enjoy.

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.

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.

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.

Jens Laipenieks

Anch  
99517



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February 18, 2022

Dear Board of Fish,

Please do not allow anymore additional Chinook or commercial fishing in the Cook Inlet or Kenai river! Please start using PURE science to manage all our species, including By-catch, and quit "bowing" to special interests. It's also time to regulate and restrict guides on the middle river. They're ruining our resource, environment and trout fisheries now that they can not "financially" guide for Chinooks on the river!

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.

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.

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.

Jerald Blackson

Sterling  
99672-0609



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February 24, 2022

Dear Board of Fish,

If you completely wipe out king salmon one river at a time not only will Alaskas economy go down it will effect so many lives that depend on the salmon to feed their families through the winter. Who says it'll stop there? Once the kings are gone what's next? Sockeye? Cohoe? Once you completely pillage the kings you'll move on to the next species and wipe them out along with Alaskan native villages and families. I hope you make the right choice on preserving alaskas wild life and Alaskans way of life instead of filling your pockets fueled by your greed

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.

Jeremy Heffele

Kasilof  
99610



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March 11, 2022

Dear Board of Fish,

I've been in Southcentral Alaska for over 40 years and enjoy fishing on the Kenai peninsula and in PWS. I hope to be able to continue this activity in the future

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.

Jerome Birch

Anchorage  
99509





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February 18, 2022

Dear Board of Fish,

I live in Renton Wa and have been working in Alaska and fishing the Kenai for more than 25 years. I realize you have a tough job balancing commercial red fishing with Kenai sport fishing, but my experience is consistent. When the nets come out the fishing on the Kenai is good, when they are in virtually no fish including Kings are caught. The bi-catch of Kings in the set nets should be an embarrassment to fish & game. A few years ago, I went to one of the processors at the mouth of the Kenai for supplies and watched a set netter bring in his catch of sockeye, which was great, but the problem was he had three "totes " filled with large king salmon. All the restrictions of single hook, no bait, catch and release for sport fisherman will not compensate for the decimation of the King run caused by the "bi-catch", especially the miles and miles of set nets from below Deep Creek to the mouth of the Kenai. This cannot continue if you want to save the best "King" fishery in the World. I will end with one anecdote that tells the whole story. About 10 or 12 years ago they closed all commercial fishing for I believe it was 3 to 5 days and I happened to be there at the time. It was the greatest single day of King fishing I have ever witnessed. It just happened to coincide with a "fishing trip" by the then Governor of Alaska! Based on what the Governor saw fishing on the Kenai was still great. Thanks for your time and my rant. JerryD

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.

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.

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. Thanks Jerry D'Ambrosio

Jerry Dambrosio

Bellevue  
98006





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March 07, 2022

Dear Board of Fish,

We fish at least every other year in Alaska and would like to see the preservation of the King Salmon

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.

Jerry Diamond  
Smithville  
64089



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February 20, 2022

Dear Board of Fish,

I disagree with this plan, the Kenai river kings are already at risk. This plan will put them further endanger of smaller runs in the future. If we want to continue to use these fish as a resource for commercial, personal, and sport fishing alike. We need to all come together and find the best management plan we can to boost these numbers and to provide opportunities for our children in the future

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.

Jesse Deaton  
Valdez  
99686



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February 15, 2022

Dear Board of Fish,

I am a sportsman who live in the Anchorage Burrough. At a time when escapement goals are currently not being reached, lowering the escape to goal would only jeopardize the fishery further for all users of the fishery. It would be asinine and irresponsible to lower the goal. Please consider the future of the fishery and not just the current market price for the commercial industry.

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 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.

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Jesse Funk

Anchorage  
99504



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February 15, 2022

Dear Board of Fish,

Local resident and sports fisherman on 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.

Jim Brady

Sterling  
99672



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March 01, 2022

Dear Board of Fish,

Alaskan resident for almost 56 years and KenI Peninsula resident for almost 30 years. The king run has been decimated. Every year in season changes are made and remade and still there is no good news in regards to this run. And now more irresponsible decisions are being considered which will only benefit the commercial set netters and further destroy the king salmon runs in Cook Inlet. Eventually Alaska will reach the point of having nothing but hatchery fish because all the native king runs will be gone and never to return.

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.

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.

Jim Trombley

Kenai  
99611





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March 12, 2022

Dear Board of Fish,

I grew up in the Interior of Alaska and now live in Anchorage. One of the perks of living in Alaska's largest city is that I can now fish one of the world's greatest sport fishing waters on a regular basis. Whether it is a long weekend or a quick day trip, the Kenai River is a go-to spot to get out of the city and re-connect with this paradise we call home.

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.

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.

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.

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Joe Balash

Anchorage  
99502



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February 15, 2022

Dear Board of Fish,

I will return to my cabin on the Kenai in Sterling for the 22nd summer. Being retired since 1992 from the AF after serving 35 years, we cherish the opportunity to spend the entire summer fishing in our back yard and spending quality time with our wonderful neighbors and family members.. We cherish these moments and thank the wonderful State of Alaska for this great and special opportunity. .I trust the work and decisions of the Board to keep managing this valuable resource for everyone's enjoyment. Thank you Alaska

6The 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.

Joe Coniglio

Parker  
80134



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February 17, 2022

Dear Board of Fish,

The escapement numbers are biological numbers. Set by fish and game. Lowering the numbers won't solve the problem. Commercial fishing..esp. by catch and foreign ships with no respect for the N.A. management model are the problem. Please address the problem.

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.

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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.

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Joel Bouse



Submitted By  
John F B thos  
Submitted On  
2/25/2021 12:08:18 PM  
Aff at on

Phone  
9073515230  
Ema  
[b thos n@out ook.com](mailto:bthosn@outlook.com)  
Address  
POB 39636  
N n ch k, A aska 99639

Concern ng proposa s # 255 and 258 to cose a tte neck and butter cam harvest n Kachemak Bay waters...I do not support th s act on.

Wh e the waters/beaches c ted at Ch na Poot, Jaka of may show dep et on of both c ams, th s s s mp y due to the bu k of c ammers us ng those areas. I don't...and have no d ff cu ty harvest ng 80 c ams n an hours effort at the beaches I go to...wh ch are not any of those that were stud ed.

The beaches l c am are more d ff cut t to wa k around on, have arge rockd areas and are not n the ma n K'bay area waters...and there s st p enty of both tte neck and butter var ety.

Change the recommendat on to cos ng those c ted beaches...an act on that s probab y a ready be ng done n some manner or another. To cose the who e bay s not nd cated or necessary and w not serve to rev ta ze the over harvested popu ar beaches.



Submitted By  
John B thos  
Submitted On  
12/22/2021 12:44:36 PM  
Aff at on

Phone  
9073515230  
Ema  
[bthosn@outlook.com](mailto:bthosn@outlook.com)

Address  
12145 Rache Road  
N n ch k, A aska 99639

Strong y support the efforts by ADFG to have a management p an for subs stance c amm ng on the east s de Cook In et beaches.

By do ng th s n the "subs stance" arena t exc udes non res dent part c pat on....wh e a ow ng A askan res dents to have frst crack at a resource, razor and other c ams, w thout hav ng out of state fo ks make the numbers needed to have an "open ng" to h gh. Th s w a ow A askans potent a y the fastest return to some opportun ty to razor c am oca y.

I support a further restr ct on to th s open ng to res dents of the Kena Pen nsu a on y, or as a frst pr or ty. Other A askan commun t es do th s, part cu ar y n hunt ng area 23, for moose w th oca res dents be ng ab e to eas y part c pate and other A askans hav ng restr ct ve s gn up requ rements, ke hav ng to phys ca y trave to area 23 to get a tag months pr or to open seasons.

E ther way, hav ng a management p an to be ab e to open, and cose f/as needed s a smart move and shoud be approved as soon as poss b e.

Let's not have a debac e ke the Be uga wha es of Cook In et be ng r fe shot/s aughtered by Bethe area nat ves under subs stance category when they have zero h story of wha ng. (ADN repeated art c es years back as the Be uga's of Cook In et "d saappeared" and nsuff c ent management efforts were made to stab ze the popu at on and nat ve "v s tors" nto Tyonek n part cu ar herded and r fe shot Be uga's...w th Bethe nat ves be ng the most reported "v s tors" do ng non h stor ca "wha ng trad t ons".

F na comment, hope the spr ng survey s a good news th ng and that some return to east s de Cook In et c amm ng s poss b e n 2022.





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March 10, 2022

Dear Board of Fish,

I have been fishing the Kenai for the past 25 years, and over the past few years, my 2 king limit has yet to be reached.

If the commercial fleet is allowed to net more, then you can kiss sportfishing good by. I wonder how many other industries that sport fishermen support by coming to the river to catch that king. Most people fly up for around two weeks and with a very limited chance to catch a king, then those dollars will end up elsewhere.

So you either support the local economy or you are telling them, screw you.

VOTE NO ON THIS PROPOSAL.

John Butler

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.

JOHN BUTLER

ORANGE  
92869



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February 15, 2022

Dear Board of Fish,

Vote NO on 283, KEEP the Kenai River King Salmon management plan.

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.

John Cho

Soldotna  
99669



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February 20, 2022

Dear Board of Fish,

riverfront owner on the Kenai and would love to see Kings return in numbers sustainable for the future. I am willing to sacrifice my king fishing until later to make sure they return. This should also be the views of commercial fishers.

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.

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.

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.

John Dolbinski

Anchorage  
99502



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March 11, 2022

Dear Board of Fish,

As an avid sportsman and fisherman who comes to Alaska often to fish and recreate I oppose proposal 283 as it is written. The rules for king salmon recovery should apply equally to the commercial fish and and sportsman regarding catching/killing/harvesting said species. It is imperative that the Kenai King Salmon fishery recover to a sustainable population level. Thank you for listening, please vote NO on Proposal 283. A

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?

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JOHN FEND

Eagle  
83616



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March 01, 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.

John Iverson

Soldotna  
99669





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March 08, 2022

Dear Board of Fish,

40 year resident. I believe that "shared pain" is the fairest way to manage fish and game. I sympathize with the commercial fishermen losing income, but reduced salmon available to non-commercial people has the same effect; we pay more for groceries and lose a great recreational opportunity. Too, many small businesses reap the rewards of sport fishers shopping in their stores. There is no easy answer to this.

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.

John Klingel  
Fairbanks  
99712



February 24, 2022

Dear Board of Fish,

My wife and I are retired Alaskans currently living on in Moose Pass. We love the area and all the land offers, fishing, hunting and scenery. We VERY concerned about our natural resource the mighty King Salmon and how it will survive in the future. That is why we're sending this letter in the hope it will help sway your decision to stay the course on your previous decision

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 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.

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.

John Smart

Moose Pass  
99631



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February 15, 2022

Dear Board of Fish,

Ladies & Gentlemen,

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.

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Thank you in advance,

John D. Thompson  
FedEx Flight Operations/Sport Fisherman/Business Owner

Saint Charles, MO. 63304

John Thompson

SAINT CHARLES  
63304-4511



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February 27, 2022

Dear Board of Fish,

John weber is the name. I'm a fishing guide down here on the kenai and kasilof river going on ten years now. I am on my hands and knees begging BoF to take into concern the longevity and lively good of these kings. I'm not from here, but I do live here now. This place is unlike anywhere in the world. There is no where in the world that produces these genetic monsters. And the numbers are showing that these fish are disappearing at a humbling rate. Please do your part and keep this place unique with its kings. Let's put salmon on a pedestal and protect these fish. Let's not sell these fish for bottom dollar price to meet demand. Anyone from here knows these fish are so much more than \$pound. Please do not be like every else in the world that has disregarded their home due to money. Put the king on a pedistal. Save the kings, by all measure. I am no on prop 283, do not lower the escarpment goal, shoot for the stars when protecting these things. Do not rob Peter to pay Paul. If you have never caught or fished for these amazing creations, I suggest you book a trip on the kenai and give yourself that moment to understand what you are voting for when you say yes to 283. No on 283, No on 283... [REDACTED] NOOO ON 283! Love your state, defend your state, protect your state. Again this is just coming from some kid that was never born here. It baffles me that individuals from this state was t to bleed it only while they are on this earth, with zero remorse for what the state will look like for later generations.

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.

John Weber

Cooper Landing  
99572



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February 15, 2022

Dear Board of Fish,

I have a son who is a licensed guide , was on the Kenai , but now guides on the Nushagak, and I was a Kenai River Guide back in the 90's, it is important to me and my family that doing everything possible to preserve the Kenai King should be done. Do not let commercial fishermen continue to damage this fragile fishery. There is really no good reason to harvest any Kings during these historic low 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.

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.

Jon Stolski

Baxter  
56425





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February 16, 2022

Dear Board of Fish,

I've fished in Alaska for 20 years. For the last 10 or so, I've spent 2 weeks fishing the Kenai in September. It's one of my favorite places on this planet. Managing the Kenai salmon runs, the foundation of the eco system, is very important to me.

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.

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.

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.

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.

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Jon Swearer

spring city  
19475



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February 17, 2022

Dear Board of Fish,

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.

Joseph Cartier

Dylan  
Soldotna  
99669



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February 17, 2022

Dear Board of Fish,

I lived in Alaska for many years and currently travel back as a sport fisherman annually and contribute thousands of dollars to the Alaskan economy. It is an old battle between sport fishing and the commercial fleet. One I delt with in the late 70's, 80's and 90's. The same argument over and over. To jeopardize the Alaskan tourism industry and economy for this short-sided view and lack of managing this great resource is a shame. Please vote "No" on Proposal 283.

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.

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Joseph Defilippis

Mesa  
85213



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March 09, 2022

Dear Board of Fish,

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.

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.

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joseph driscoll

SEASIDE  
93955



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February 15, 2022

Dear Board of Fish,

I have been fishing Kings on the Kenai for nearly for 40 years. I have a home on the River and hope with proper management we will once again see Kings thrive as they did in the 1980s and '90s. We have all been sacrificing over the last few years to save the run. Don't throw that away now to benefit a few individuals.

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?

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.

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Joseph Vidrine

Anchorage  
99517





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February 24, 2022

Dear Board of Fish,

It takes very little common sense to see how the Kenai king salmon run has been decimated over the years and that the only thing that has provided any chance of the run coming back are the conservation restrictions put in place over the last decade. We all know how proficient the commercial fishing fleet is at catching fish and that at this point to allow them to fish for kings would be catastrophic. Thank you for your consideration in this matter.

Concerned Alaskan, Blake Zollinger

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.

joseph zollinger  
EAGLE RIVER  
99577



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February 16, 2022

Dear Board of Fish,

This is absolutely ridiculous.

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 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?

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.

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Joshua Abrams

Washington  
27889



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February 26, 2022

Dear Board of Fish,

I live in Anchorage, I fish once a year on the Kenai for an enjoyable experience and hope to take home a few fish to eat over the year. I have many friends that base their livelihood on sport fishing. Sport fishing is considered population control to keep the ecosystem in tact. Commercial fishing takes zero environmental precautions, disrupts the eco system, kills a large amount of unintended wildlife, and negatively impacts sport fishing.

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 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.

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Joshua Bleznak

Anchorage  
99507



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March 07, 2022

Dear Board of Fish,

joshua shuman Harrisburg pa I have been to Alaska on fishing trips and the only thing that you should be concerned about is protecting the king salmon . I think that all sport fishing should also be shut down for king salmon till the numbers say that its safe to fish for them

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.

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joshua shuman

HARRISBURG  
17110



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March 10, 2022

Dear Board of Fish,

I currently live in Pennsylvania, but was fortunate to call Alaska “home” from 2014-2017. During my time there, I had the great pleasure of fishing The Kenai several times each year, including for kings. I am 51 years old, have been fishing my entire life and can confidently say that fishing in Alaska is an experience unlike any other.

I will continue returning to Alaska, whenever I’m able, and I intend to bring friends and family with me, so they can also enjoy these wonderful experiences.

I’m hopeful that through this petition, Proposal 283 will be defeated. Thus, preserving the king salmon population for recreational fishing that we can all continue to enjoy.

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.

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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.

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JP Connelly

Garnet Valley  
19060





Submitted By  
Juan Manos  
Submitted On  
3/11/2022 2:07:58 PM  
Affiliation  
F/V Scotch Cap

Phone  
9072509470  
Email  
[juan.manos@gmail.com](mailto:juan.manos@gmail.com)  
Address  
Rams Creek Loop  
KING COVE, Alaska 99612

Madam Chair & Members of the Board,

What can I say that hasn't already been said about the draconian proposal 182. I could try and inundate you with the science and numbers but at this point I imagine you've got enough of that from scientists much more qualified than me. Yes, Area M is a mixed stock fishery. Yes, there is a long history of this, dating back to the early 1900s when Pacific American Seafoods (now Peter Pan Seafoods) built a cannery in 1911 in King Cove. Yes, we harvest a small proportion of fish that transit to various parts of the state. To deny the history of Area M's mixed stock harvest is unreasonable, but equally unreasonable is to assume that we are the major contributors to the failures of any of the various runs that are in decline or failing throughout the state. As described by a paper that examined the effects of mixed stock fishery on a stock of concern, "Results indicate that a mixed stock fishery, for which a specific stock contributes only a small portion of the total harvest, may have little relative effect on the stock, even if this is a substantial decline and the total harvest of the fishery remains unchanged." (Lloyd 1996). From the most applicable science to date, the Western Alaska Salmon Stock Identification Program (WASSIP), Area M's harvest rate of Chignik bound sockeye is in the low single digits, which I believe would qualify as a small portion of the total harvest.

What is happening in Chignik is clearly a concern. The cause of this though is exponentially more confounding, confusing, and convoluted. Making regulatory changes to this neighboring Area M fishery out of cycle and without the benefit of current ADF&G analyses for both Area M and Area L seems myopic and ineffective in actually figuring out what is going on in Chignik and how it can be solved. As a fisherman, the thought of sitting on the beach waiting for fish is a not only a disturbing idea but indeed a harsh reality that has played out for us in Area M for the last five August even years, dating back to 2010. And the reality of those even years is that often June and July are what kept our seasons afloat. My first year owning and running a boat in 2012, I waited until September 17th in hopes of a late Pink or Coho run to fish on, it didn't happen. I arrived late in June that year, missing more than half the month, and July was dismal. Were it not for the good people at the Alaska Division of Economic Development who helped finance my operation and who opted to push back my first loan payment a year, I don't think I would have made it.

Since 2013, I have attended and testified at every in-cycle Board of Fish meeting for our area. And at every meeting the South Peninsula has lost something. In 2013 we lost three days of fishing in June, in 2016 it was a hard cap on sockeye harvest in the Dogo area (I believe windows for July were agreed for a gear types as well), and in 2019 the purse seiners were completely removed from the Dogo area in June. And at each of these meetings we were told it was a compromise. After hearing that word for nearly 10 years now it's hard to see such changes as being anything but a loss. But even so, after each of these management changes we hoped, that at the very least, it would do something to help our Chignik neighbors and any other communities in the state that rely on salmon. Unfortunately however, that doesn't seem to be the case. At some point we will be compromised out of a viable fishery. Boats will try to leave or be sold, our communities that rely on the fishery will suffer, and it will lead to destruction as we are compromised out of existence.

I know there is no proverb a smoking gun or arrow to the heart set of facts or information that will convince you one way or another. However, if you are to take action on this proposal and limit our June and July seasons by nearly half, that will be an arrow to the heart of our entire area. Please consider holding off making any changes out of cycle and instead examine the management plans of these areas next year at the regularly scheduled meeting. When the entirety of these management plans can be viewed and assessed as a whole and not in the vacuum of once specific out of cycle proposals.

Respectfully,

#### LITERATURE CITED

Juan Manos

Lloyd, D. S. 1996. Relative Effects of Mixed Stock Fisheries on Specific Stocks of Concern: A Study. Alaska Fishery Research Bulletin 3(1):21-31.

Submitted Mode and Brief Case



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March 08, 2022

Dear Board of Fish,

I have lived in Alaska for 40 years. My family and I have enjoyed fishing the Kenai, Resurrection Bay, etc. We do not need more commercial fishing in our rivers.

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?

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.

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.

Julie Erickson

Anchorage  
99511



Submitted By  
Karen S. McGahan  
Submitted On  
2/21/2022 11:58:17 AM  
Affiliation  
Cook Inlet Set Netter

Phone  
907 252 1136  
Email  
[bouderpoult@alaska.net](mailto:bouderpoult@alaska.net)  
Address  
54025 Kena Spur Hwy  
Kena, Alaska 99611

IN FAVOR: PROPOSAL 283

This is the first glimmer of hope we have seen for our fishery (which has a long history) to remain viable. We have 3 generations of our family currently fishing on our fish site, which is located on Samatof Beach in N. K. Sk.

I have been a resident of N. K. Sk. for 58 years, and my husband has been here for 67 years. We have been involved in commercial fishing for almost all of that time. My husband first fished on this beach as a crew member in 1955. At that time, our adult children held the permits, and we again are crew. Since 2011, there seems to have been a systematic effort by our own government to decimate our Cook Inlet Commercial Fishing Industry. The "proposed restrictions" have never been based on biology, nor have they been equitable or appropriate. The result has been huge overescapements of sockeye salmon in the Kena River and the Kasof River. We fish 12 miles north of the Kena River. The set net fishermen have never targeted Kings. Our money fish, and the fish we need to fish are the sockeyes. In 2021, we had a total of 5 fishing openings. 2 of these were impossible for us to fish during the whole opening due to extreme tides, and no access to our beach. As soon as the sockeye run started to appear on our beach, we were shut down. And then there was a huge sockeye run which went way over the established optimum escapement goal established by the department.

So we waited. Hoping for an opening. Finally, we thought we would get openings after the late run King Management plan ended on July 31st. But no, we remained closed for the season. How do we hire crew or expect our college-age help to wait to see if they will fish? It's impossible.

This proposal will give us a chance to harvest the sockeyes that we target, and also help the Kena River to be healthy for future runs. The consistent overescapement of sockeye salmon the last few years will have an impact on the future runs that certainly won't be good for anyone.



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February 19, 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.

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.

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.

Another item on this proposal reads CM when have we ever measured in centimeters. The Regulations we have to read through all read in inches!

Kathleen Harding

Kenai  
99611



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To ADFG Board Members:

I moved to Alaska in 1979. I immediately fell in love with the Alaska way of life. I learn to bait my own fishing hook and clean my own fish from my aunt Edna when I was 10 years old. I quickly used these skills to fish the waters of Alaska, catching salmon, halibut and the other jewels of the waters of Alaska. The most precious jewel of the waters of Alaska were the Prince William Sound shrimp. I discover them, much to my delight, by the efforts of the dedicated commercial fishermen.

It is much to my chagrin that ADFG is trying to control and decrease the ability of the commercial fishermen to supply us with the Prince William sound shrimp on the open market.

I have friends who shrimp off their boats, catch a few now and then, but not a reliable source for my needs. I love shrimp and make great southern shrimp and grits. Don't take my shrimp away from me! This 90 year old lady needs her commercial fishermen. I still like to fish but do not know how to shrimp or swim.

There are others like me who don't really realize ADFG is attempting to limit their seafood supply, but are also affecting the income of the hard-working commercial fishermen. Sounds unfair in all aspects to me. How would you like someone to constrict your income? Please reconsider your proposal.

Respectfully,

Katy Nalley  
Anchorage, Ak





March 01, 2022

Dear Board of Fish,

Life long alaskan, grew up enjoying alaskas resources. Lowering the OEG is only going to hurt our future. When you set a goal you arnt meeting the solution is not to lower the goal to meetable level, the solution is to address issues that will allow for meeting the goal. Our Cook Inlet commercial fisherman take a percentage of the run as do the sport fisheries, our main problem is an ocean survival rate from bycatch and lack of feed due to overpopulation of stocked fish, and obviously climate change. Certain factors are out of our hands but addressing bycatch and limiting stocking is our next step. The local comm fleet and sport fish have sacrificed enough but now is not the time to give a hand out for a small minority of commercial permits. It does not make sense from an economic value or a ecological benefiting decision. Oppose prop 283 and will be at the board of fisheries to voice my opinion.

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.

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.

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.

Keenan Vonbirgelen

Anchorage  
99502



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February 23, 2022

Dear Board of Fish,

I live in the valley and am a die hard fisherman at heart, favorite species to target is king. Sadly there numbers dwindling fast and they need are protection if their gonna make a comeback

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.

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Keevan Dinkel

Wasilla  
99654



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March 11, 2022

Dear Board of Fish,

I live in Oregon and have been fishing the Kenai for the past 3 years. Preserving this valuable resource and maintaining a healthy and robust King Salmon run each year should be one of the highest priorities for Board of Fisheries. All efforts to protect the King Salmon run should put in place even if it means impacting commercial fishing. We must protect this valuable resource

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?

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.

Keith Frede

Bend  
97003





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February 15, 2022

Dear Board of Fish,

I'm against Proposal 283. In order to protect and maintain a struggling king salmon return, we can not harvest our way back to abundance by allowing more fishing in the commercial sector.

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.

Keith Holtan

Kenai  
99612



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March 03, 2022

Dear Board of Fish,

Lowering the escapement for Kenai Kings to help the Commercial Fisheries is robbing from Peter to pay Paul. Keep the escapement numbers where they are. I don't have a clue what people must be thinking to propose we take from the Kenai so commercial fishing has more options. We have not been able to fish for Kings for over 20 years in my family as we saw the numbers declining and quit fishing for them 30 years ago. We need to continue to rebuild the king salmon runs. . We do not have the proper escapement of Kings on the Kenai that we need to bring it to a healthy number. Do not make changes that will hurt the build up of Kenai King runs.

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.

Kelly Sidebottom

Palmer  
99645





March 1, 2022

To: Alaska Board of Fisheries  
From: Kenai River Sportfishing Association  
Date: March 1, 2022  
RE: Opposition to Proposal 283

**Kenai River Sportfishing Association (KRSA) opposes Proposal 283 which ignores the Optimum Escapement Goal (OEG) adopted by the Alaska Board of Fisheries in 2020 for late-run Kenai River King Salmon and liberalizes commercial gillnet harvest at a time of record low numbers and chronic inability to meet established escapement goals for this iconic stock of king salmon.**

- Fewer than 13,000 large Kenai Late-run Kings returned to Cook Inlet in each of the last three years. This is less than one third of the long-term average of 42,000 per year.
- The 2022 forecast (16,004) is the lowest preseason forecast ever issued.
- Escapements have failed to reach either the OEG or SEG minimums in three consecutive years and five of the last nine.
- Recent data indicates that low King escapements continue to produce low returns under current conditions.

Proposal 283 seeks to allow the east side commercial set gillnet fishery to continue to fish within 600 feet of shore even when sport and personal use fisheries were closed due to critical low numbers under paired restrictions identified in the current management plan. Commercial set gillnet fishing would be allowed when the Kenai River late-run King Salmon escapement is below the current OEG established in the plan (15,000-30,000) but escapement exceeds to lower end of the SEG (13,500).

This proposal would effectively increase the commercial fishery harvest of Kenai River late-run King Salmon, reduce spawning escapement, and increase the imbalance in allocation of fishery impact in favor of the commercial set net fishery.

***1. The proposal fails to adequately protect spawning escapement of the Kenai River king salmon.***

The Kenai late-run King OEG was adopted at the 2020 Board meeting expressly to protect spawning escapements during poor run years. The OEG provides a 1,500 fish buffer relative to the SEG to avoid low numbers at the cliff edge of long-term conservation and yield problems. As abundance declines, every spawning fish becomes precious. The OEG recognized great uncertainties in productivity of Kenai Kings at low escapements where we have never been before. It also provides insurance for forecast errors - actual runs have been overforecast by 50-90% in the last three years.



**2. The proposal prioritizes current yields of Sockeye over conservation and future yield of Kings.**

cost of continuing commercial limitations for years to come.

Proponents of this proposal will point to the sonar count of Sockeye salmon and claim that hundreds of thousands these fish have gone unharvested. While it is true that the Sockeye sonar counts are more than management objectives, it is not true that all the excess would be harvested with increased commercial set net fishing identified in this proposal. Fewer than 100,000 additional Sockeye would likely be taken. This would amount to less than 10% of the annual commercial harvest of Sockeye in the Upper Cook Inlet and far less than 1% of the annual commercial harvest of Sockeye in the State.

The proposal violates the express direction in the management plan [5 AAC 21.359 (a)] to "manage the late-run Kenai River king salmon stocks primarily for sport and guided sport uses in order to provide the sport and guided sport fishermen with a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of inriver restrictions."

The proposal is contrary to the precautionary principle in the Policy for Management of Sustainable Salmon Fisheries [5 AAC 39.222 (c)(5)] which directs that stocks and fisheries shall be managed conservatively in the face of uncertainty. The Kenai King run is in the midst of an unprecedented period of low abundance, declining fish sizes and poor productivity. They are in a hole they have never been in before and future prospects for recovery are the very definition of uncertain.



4. **The process for proposal review, out-of-cycle with the normal Cook Inlet meeting, does not afford adequate opportunity to consider complex tradeoffs among finely-balanced management plans governing Upper Cook Inlet fisheries.**

The normal Board cycle considers dozens of proposals representing a wide spectrum of viewpoints. The process allows for a thorough consideration of issues and tradeoffs. This is the sole proposal identified for Upper Cook Inlet in the 2022 statewide meeting which will not allow for a thorough consideration of all related concerns. The paired commercial and sport fishery provisions in the Kenai King-plan are the lynch pin in Upper Cook Inlet management during periods of low abundance. Pulling on that single thread will unravel the carefully-crafted fabric of interacting management plans and produce a landslide of unintended consequences throughout Upper Cook Inlet fisheries.

**In summary, KRSA strongly opposes Proposal 283. It fails to adequately protect spawning escapement of Kenai River king salmon at a time of record low numbers and uncertain prospects for the future. It jeopardizes the future health of the Kenai King Run for the marginal benefit of catching a few more sockeye now. It violates long-established Board policies for equitable sharing of conservation burdens and precautionary management for sustainability. Finally, out-of-cycle consideration of a single issue will likely produce unintended consequences in the complex of existing Upper Cook Inlet salmon management plans.**



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February 15, 2022

Dear Board of Fish,

Save Ar salmon, stop this bill in its tracks. Thank you

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.

Kent Smith

Soldotna  
99669



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February 15, 2022

Dear Board of Fish,

Thank you for your service on the Board of Fish!

We need to protect the Kenai River King Salmón for the next generations. Please let the run rebuild.

Thanks Kevin Branson

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.

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.

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Kevin Branson

Anchorage  
99508





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February 15, 2022

Dear Board of Fish,

Since 2008 i have spent a month in AK in July. I have seen the number of Kings drop in the Kenai. first size and then numbers. While i do not fish Kings in the Kenai i will tell you they are a National Treasure that must be protected!! also if they hit the endangered specie list look out. Then it will get shut down far worse than now. DO NOT DROP THE ESCAPENT NUMBERS!!!! Its clearly a sell out to comfiss.

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.

KEVIN GROSS

Becker  
55308



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February 17, 2022

Dear Board of Fish,

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 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?

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.

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Kevin McElhaney

Anchorage  
99515



Submitted By  
K ey Thompson  
Submitted On  
3/9/2022 10:10:30 AM  
Aff at on

Phone  
9079526890  
Ema  
[thompsonsdp@ao.com](mailto:thompsonsdp@ao.com)  
Address  
P.O. Box 116  
Sand Po nt, A aska 99661

Members of the A aska Board of F sh

My name s K ey Thompson. I am a 29 year res dent of Sand Po nt, AK. I am an Area M perm t ho der and have been nvo ved n the sa mon f shery s nce 1993.

I am very d sappo nted that Area M f shermen must aga n spend t me, money and resources defend ng our f shery before the Board. In 2001, 2004, and 2006, the state prosecuted the WASSIP genet c work wh ch became the standard for sa mon stock dent f cat on n Western A aska. WASSIP data c ear y shows very ow harvest rates on Ch gn k bound ear y run sockeye n both the Do go and part cu ar y the Shumag n areas of Area M.

In 2019, the Board took act on that e m nated the se ne f shery n the Do go ls and area n June comp ete y. Th s was a comprom se that that se ne feet agreed to. The resu ts of th s act on have not even had the t me to be rea zed yet, as adu t sockeye w not return unt 2022 at the ear est from 2019 spawners. S nce that act on, Do go harvests have fa en dramat ca y w th no apparent benef t to Ch gn k ear y run sockeye.

The author of Proposa 282 c ear y does not have the stated conservat on n m nd n wr t ng th s proposa . The drast c cuts presented by the proposer requ re the Area M f shery to be gutted n order to save a sma amount of Ch gn k bound sockeye as shown by WASSIP data. The goa of the proposer s for Ch gn k to e ther h t the m dpo nt of ear y run escapement of 400,000 (ADF&G data nd cates that s nce 1980, that has happened on y 46% of the t me) or have a commerc a sa mon open ng.

Sad y, the fact s that the Ch gn k ear y run d d suffer some setbacks recent y. However, th s s not the t me or p ace to be mak ng an a ocat on grab. The board has the opportu nty to rev ew a the data at ts 2023 cyc e when ADF&G w present much more n-depth nformat on on the cond t on of Ch gn k sockeye stocks. It may be that the Ch gn k Management P an has the ab ty to be adjusted to a ow f sh ng t me and recovery of the ear y run sockeye.

In conc us on, the Department reta ns ts E.O author ty and has used t n 2018 and 2020 w th c osures n both the June and Ju y f sher es n Area M to protect Ch gn k ear y run sockeye. Board act on every t me a f shery doesn t meet an escapement goa underm nes the Department s know edge and author ty n manag ng hea thy f sher es across mut p e areas.

S ncere y,

K ey Thompson



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February 18, 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.

Kim Frederick

Providence  
84332



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February 27, 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 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.

Kim Miller

Waconia  
55387





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To BOF ,  
I'm a lifelong Alaskan who has enjoyed Spot Shrimp from PWS for decades .. (excepting a big lull for Exxon Valdez...)  
I don't own a boat , so I depend on the Commercial folks...  
This is the only way for me to get shrimp.  
I hope you allow a viable commercial fishery so that  
My family can continue enjoy the best shrimp on the planet.  
Thanks,  
Kirk McGee

Sent from my iPhone





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March 04, 2022

Dear Board of Fish,

My fiancé and his family own property on the Kenai and we spend every summer up there. I want our future children and their children to have these fond memories as well.

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.

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.

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.

Kirsten Fuchs

Greenacres  
99016



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March 07, 2022

Dear Board of Fish,

Please vote no on Proposal 283.

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.

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. The estimates have been higher than actuals each of the last 5 years. Basing decisions on estimates rather than actuals is a death sentence to the Kenai King Salmon because it will enable commercial fishing before sufficient king salmon have actually made it into the river, based on the OEG.

I am grateful the Board had the courage in 2020 to take action to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections while promoting 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.

Thank you for your continued courage and vigilance.

Sincerely,

Kristin Mellinger

Kristin Mellinger

Soldotna  
99669



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February 28, 2022

Dear Board of Fish,

King Salmon numbers are declining. We must include conservation measures do all Alaskans have access to King Salmon.

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.

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.

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Kristine Hutchin

Eagle River  
99577





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February 17, 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.

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.

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.

Kyle Spaulding

Apt 4 Anchorage  
99502



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February 17, 2022

Dear Board of Fish,

As Chair of the Washington State Academy of Sciences Working Group on Environmental Quality, Sustainability, and Climate Change and as Chair of the Washington State Salmon and Steelhead Hatchery Reform, I strongly oppose Proposal 283 based on the Science.

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.

Larry Dalton

Silverdale



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March 12, 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 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.

Larry white

KENAI



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February 18, 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.

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.

Laura Edmondson

Anchorage  
99516



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February 23, 2022

Dear Board of Fish,

We have a home on the Kenai River and are fortunate to be able to fish this river. I have not fished for the king salmon for 6 years due to the low numbers that return to spawn with holes that the return number will increase. Please do not lower the escapement, allow the king run to flourish once again.

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.

Laura Tallman

Soldotna  
99669





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February 19, 2022

Dear Board of Fish,

I live in Anchorage, I've lived here since 1976. And I've watched as the Kenai River king salmon fishery has virtually disappeared. The number of large kings over 60 lbs has plummeted to almost nothing. I blame this on two things: commercial fishing and letting tourists fish and keep large fish. This is a world class of salmon, folks, and needs to be preserved. Why not limit the size of fish kept to promote survival of the big ones? I don't see why any tourists come to the Kenai to fish for king salmon. I've given up. There is still time to save this resource. Who knows, maybe in ten years it will come back to when I first came here.

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?

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.

Lawrence Hale

Anchorage  
99516



Submitted By  
Leah Jackson  
Submitted On  
3/9/2022 9:27:27 PM  
Aff at on

Phone  
907-513-8240  
Ema  
[mrs.acksonteaches@yahoo.com](mailto:mrs.acksonteaches@yahoo.com)  
Address  
52500 Leah St.  
Kena , Alaska 99611

IN FAVOR proposa 283

I am wr t ng to et you know I am n favor of th s proposa . It s cruc a and cr t ca for a ow ng oca set net commerc a f sherman to have a fa r and eth ca opportun ty to harvest f sh. The state const tut on guarantees us th s r ght, but n recent years we have not been granted the opportun ty to f sh as we shou d due to EXTREMELY unfar pa red restr ct ons. Th s proposa g ves me hope that we may see t me w th our net n the water yet aga n. P ease, cons der the oca fam es who have f shed these beaches for generat ons. P ease, pass th s proposa . Pa red restr ct ons are based on po t cs, not b o ogy- get r d of them ent re y! Thank you.



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March 07, 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.

Lee Ann Ross

Bend  
97703



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February 17, 2022

Dear Board of Fish,

Have fished the Kenai for years. Would be a shame for it to be more decimated for king fishing.

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.

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.

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.

Lee Johnson

Baxter  
56425



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February 24, 2022

Dear Board of Fish,

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.

Lee Stafford

Soldotna  
99669





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February 25, 2022

Dear Board of Fish,

We are 53 year Residents of Alaska and have fished the Kenai , Homer and currently have a boat in Valdez and fish PWS. Please do what is right and oppose 283

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.

3The 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.

Leonard and Diane Jewkes

North Pole  
99705



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March 07, 2022

Dear Board of Fish,

I have fished the Kenai ever since the 1980's and remember what a thrill it was to catch kings over 60lbs. The Kenai today is still a great salmon river but the king fishing is a small fraction of what it once was. Please allow conservation to work and bring back the mighty king salmon

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.

Leonard Dullea jr

Peabody



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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 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.

Levi Forrest  
Solditna  
99669



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February 23, 2022

Dear Board of Fish,

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.

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Levi Robinson



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

February 14, 2022

Dear Alaska Board of Fisheries,

Please don't let other people catch too many of our fish because we need food too. We are running out of fish. Our parents and grandparents like to go fishing. Let's share the fish.

We like to smoke fish. You should try it someday. You should try it someday because it's yummy and good for you. It doesn't take many fish either. It doesn't take many fish because it is a small process. We also make this very sweet fish. We put brown sugar on it and bake it in the oven.

Sincerely,  
Lillian Anderson  
Chignik Lagoon  
In 3rd Grade





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March 11, 2022

Dear Board of Fish,

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.

Linda Leary

Eagle River  
99577



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February 16, 2022

Dear Board of Fish,

I am a forty-three year resident of the state of Alaska and have watched our fishing resource be managed to death. Every River on the road system from Homer to Talkeetna used to be full to the brim with fish. Now there are no fish to be caught in any river of the Susitna Valley, every river is closed to the taking of all salmon. I'm tired of the sportfisherman being totally cut off from harvesting to feed their families and the commercial fishermen are allowed to continue fishing. If you are going to close the resource to one group close the resource for all groups and allow the salmon runs to replenish.

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.

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.

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.

Linda A Schmitt

Chugiak  
99567



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March 09, 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 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.

Linda Schwanke

KENAI  
99611



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March 12, 2022

Dear Board of Fish,

Please vote no on Proposition 283 and protect Kenai salmon.

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.

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Lorali Simon  
Palmer  
99645



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February 26, 2022

Dear Board of Fish,

I have been spending the summer on the Kenai river for the past 15 years. Please Do not change the Kenai River plan in favor of commercial fisherman.

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.

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.

Lorie Crawford

Boise  
83713





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February 15, 2022

Dear Board of Fish,

I no longer live in Alaska full time, but I was born and raised there and return every summer to spend time at my cabin in Willow and fish on the Kenai. Over the many years I lived in Alaska full time, one of the most enjoyable activities I regularly participated in was fishing for Kings in the Kenai. I would like to think that my grandson will have chances to fish for those world famous fish in the future.

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 further damage to future runs by extending commercial openers that will exacerbate the problem of King Salmon by-catch.

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.

Lorran Skinner

Burien  
98166



February 23, 2022

Dear Board of Fish,

My name is Lucas Noling. I was a fishing guide on the Kenai river every summer through college. I still visit from time to time. The kings on this river are amazing fish and must be protected at all costs. Please do not lower escapement goals. You are holding in your hands the last true run of king salmon with magnum genetics in the world. To do anything but protect them would be a tragedy.

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?

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.

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.

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.

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Lucas Noling  
Portland  
97222



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February 18, 2022

Dear Board of Fish,

We own a home on the Kenai River and actively fish the river 9 months out of the year.

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.

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Thank you.  
Lyndel Brady

Lyndel Brady

Sterling  
99672



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March 10, 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 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.

M Hausenfluke



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March 08, 2022

Dear Board of Fish,

We live in Kenai and have been fishing Cook Inlet water for 40 years. The sport fishery has done nothing but deteriorate under your management. It is time for serious change.

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.

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.

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Mack Padgett

Kenai  
99611





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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

My husband is from Chignik and has fished there all his life. We have a home there and we all fish together as a family. We depend on salmon fishing for our livelihood. My oldest son is hoping to buy a boat someday so he can follow in the footsteps of his Great-Grandfather, his Grandfather, and his Dad. All 3 of my kids are trying to make enough money to pay for higher education as well. In reality, everyone in Chignik is dependent on salmon fishing in some way. The Chignik salmon fishery puts food on our table and a roof over our heads. The fishery funds the City of Chignik and thus keep the lights on in our houses and provides the fuel to heat our homes. It is the reason for Chignik's existence. Our salmon runs are essential for subsistence and commercial fishing. Our economy is built on our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for the Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Magda Kopun*



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February 16, 2022

Dear Board of Fish,

The Alaska fish ecosystem plays a huge role and I feel that that bill is being wreckless and not protecting wildlife.

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.

Makinsie Davis  
West Haven  
84401



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March 07, 2022

Dear Board of Fish,

Please do not do anything to lower King Salmon escapement goals. The drop in numbers has had a devastating impact to sports fishing and tourism. Commercial fishing must be regulated

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.

Marc Walch

Soldotna  
99669



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February 24, 2022

Dear Board of Fish,

Please do NOT approve Proposal 283. It's bad for King Salmon. Our Chinooks are gradually going the way of the buggy whip. I'd like to see them come back and thrive.

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 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.

Margaret Nelson

Anchorage  
99507



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February 19, 2022

Dear Board of Fish,

Please do everything in your powers to protect the kenai king salmon! I've never fished the Kenai for king out of a desire to see the run come back strong and thrive- please help me be part of the solution- lets leave some mighty Chinook for our great grand children!

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.

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.

Maria Robinson

Anchorage  
99516





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February 24, 2022

Dear Board of Fish,

My husband and I own Kenai river property. Approximately 20 years ago I caught my one and only king and it weighed 62 pounds bigger than anything my husband ever caught! I oppose proposition 283!

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.

Marjorie Newman

Eagle River  
99577



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February 17, 2022

Dear Board of Fish,

Vote no. Save what's left of the Kings, do your job and protect the Kings.

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.

Mark Arkens

Soldotna  
99669



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February 15, 2022

Dear Board of Fish,

This should never pass. We need to take care of a unique species of fish. Put fish first for all to use down the road

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.

Mark Cohen

Anchorage  
99516



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February 21, 2022

Dear Board of Fish,

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.

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.

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.

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.

Mark Glassmaker

Soldotna  
99669



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March 11, 2022

Dear Board of Fish,

As 40 year user of this resource I am appalled that the once magnificent king runs will be further decimated by Proposal 283.

Alaska State constitution specifically puts resource conservation and public use before commercial harvest. Proposal 283 will put commercial harvest interests ahead of all else, primarily restoration of the gene pool of the once world famous Kenai kings.

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.

Mark Kromrey

Chugiak  
99567





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February 17, 2022

Dear Board of Fish,

My name is Mark Lambert, and I annually make a trip to Alaska for one reason: to fish for salmon. The health of the fisheries in the whole state is important to me and all of my several friends I bring to your great state. Without proper management you will lose the attraction that brings such a vital boost to your economy. If the fish are not there in good numbers, people simply won't come. And I don't know the numbers but I bet the tourism the salmon bring in small groups of fishermen far outweighs the economic boost of the commercial fisheries, or in other words the commercial fishermen do not provide an economic boost that is as far reaching as the sport fishermen.

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.

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Mark Lambert

Twin Falls  
83301



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February 18, 2022

Dear Board of Fish,

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 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.

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.

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.

Mark Madden

Anchorage  
99502



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March 07, 2022

Dear Board of Fish,

Fished the Kenai at BIG SKY last July. Caught sockeye but came to Alaska primarily for the Kings. Caught only one in 4 days fishing and was not able to bring aboard for picture. Believe it will hurt sport fishing trade if this continues. In my opinion, reduce the catch of commercial harvest to allow the thrill of Kings on rod and reel.

Good luck Joe

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.

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.

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mark maitz

schnecksville  
18078



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February 24, 2022

Dear Board of Fish,

We own property on the Kenai River and I have not fished for kings for at least 15 years! I would like to make the Kenai River great again and passing proposition 283 is not going to do it.

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.

Mark Newman

Eagle River  
99577



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March 07, 2022

Dear Board of Fish,

Our globe's waters are too precious to give commercial fishing even more time in the water. Please do not take away this resource from the people of Alaska and future generations

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.

Mark Oliver

Sicklerville  
08081





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March 05, 2022

Dear Board of Fish,

Im a sportsman raising my family in Alaska. We live in Chitina and Anchorage and fish and dipnet the Kenai and Copper. We dipnet in large part to ensure we are able to harvest the fish we can't catch sport fishing.

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.

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.

MARK SPENCER

Anchorage  
99502



Submitted By  
Mark Wacker  
Submitted On  
2/7/2022 1:50:14 PM  
Aff at on

Phone  
907-394-8378  
Ema  
[akfshoogy@gmail.com](mailto:akfshoogy@gmail.com)  
Address  
PO Box 753  
So dotna, A aska 99669

BOF,

I am wr t ng n regards to proposa 283. To say I'm strong y aga nst th s proposa s a mass ve understatement, and I hope you fee the same. I cannot understand the rat ona e that wou d cause someone to support the certa n harvest of MORE k ng sa mon mmed ate y fo ow ng the worst run n recorded h story. It's rrat ona , destr ct ve, and downr ght se f sh to say the east. I do understad that ESSN members are try ng the r best to prov de more opportun ty for themse ves, but unfortunate y they cannot accomp sh that w thout s mutaneous y r sk ng a frag e run of genet ca y s gn f cant ch nook that may be on the br nk of anh a at on. If ever there was a t me to deny further bera zat ons, t's now. Th s cou d be the t pp ng po nt, and you want to be on the r ght s de of h story on th s one; the s de an overwhe m ng major ty of A askans are on!

Mark Wacker



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March 07, 2022

Dear Board of Fish,

Please do not pass this bill! If you do you are allowing the big machinery of the money people take over ! I have seen the devastation they do to the sport of your fishing and it is terrible!

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.

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.

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.

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Marlis Key

Casper



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February 24, 2022

Dear Board of Fish,

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 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.

Martha Woodard

Kenai  
99611



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February 21, 2022

Dear Board of Fish,

I know that I don't live in Alaska, but I still view it as the last frontier. My wife and I love visiting your great state. The fishing and hunting are fantastic. I fear commercial fishing in the Kenai during the king runs would do irreversible damage to the population.

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.

Martin Coffey

GASTON  
47342





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February 16, 2022

Dear Board of Fish,

I live in the Kenai area because of the natural resources. Sport and personal use fishing is very important to me and my family. The commercial interest to should be limited just as the other users. Obviously there is a greater financial interest to boost open commercial fishing. Before they get a larger share how about one season of observers and see if the claimed king bycatch number is honest. Wildlife officers are checking personal use but are they checking commercial setnetters?

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.

Martin Thurber

Kenai  
99611



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February 24, 2022

Dear Board of Fish,

I've been an Alaska resident for 36 years, fishing the Kenai and many other Alaskan Rivers for salmon. I believe mismanagement and unknowns on the open sea have lead to the near extinction of Kings in the Kenai and many other area rivers. I don't believe you can continue decreasing the spawning stock and continue to have King salmon in the Kenai or other Cook Inlet rivers. Fishing at the mouth of the Kenai needs to be restricted for commercial fishers as well as other users, as King Salmon stocks are significantly down from previous years.

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.

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 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?

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Mary Anderson

Anchorage  
99516



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February 26, 2022

Dear Board of Fish,

Prop 283 should receive a resounding NO vote. It shouldn't even be considered. This proposal will allow for the killing of More Kings and will never allow for enough returning Kings to keep the population healthy. Should this type of proposal be allowed then eventually the Kenai River Kings will become endangered then it will become a Federal fish. This will never come to good for anyone using this resource. Everyone must be willing to give up something for the maintaining the species. This proposal is nothing more than the fox guarding the henhouse. Vote No!! Please for this magnificent species keep the fox away.

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.

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.

Mary Mundell

Ninilchik  
99639



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February 16, 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.

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?

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Matt Ashcraft

Eagle Mountain  
84005





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February 26, 2022

Dear Board of Fish,

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.

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?

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.

Matt Lewallen

Anchorage  
99515





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February 15, 2022

Dear Board of Fish,

This plan is asinine, and only a complete idiot would support it. We all know, even if you idiots on the Board of Fisheries want to bury your heads in the sand and try to avoid it, that the Kenai River fishery is in big trouble... especially the chinook runs. Now, on the heels of reports that the sockeye fishery is expected to see extremely low numbers this coming year, you want to cut corners... put the chinook fishery at continued risk... so the commercial ocean rapists can take more sockeye? Idiots... all of you. You won't stop until the Kenai chinook run is completely gone.

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.

Matt Lund  
Anchorage  
99507



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February 16, 2022

Dear Board of Fish,

I've been to Alaska fishing salmon once and can't wait to go again. My uncle goes every year and he has invited me to go with him again. The fishing was like nothing I've experienced in Utah. I can't wait to go again and I don't want the resource to be abused or taken advantage of.

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 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.

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.

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Matt Taylor

Riverton  
84096



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February 26, 2022

Dear Board of Fish,

I enjoy fishing the Kenai and hope to someday enjoy with my grandkids. Please stop allowing the over fishing of this river.

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?

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.

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Matt Weller  
55082



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February 15, 2022

Dear Board of Fish,

I live on the Kenai River and want to help protect the King run and see it rebound!

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.

Matthew Richards

Soldotna  
99669



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February 15, 2022

Dear Board of Fish,

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?

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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.

Max Eckhardt





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February 15, 2022

Dear Board of Fish,

As a life long resident and sport fisherman of the Kenai, I have seen the alarming decline of the Kenai kings first hand in just my short lifetime. The Kenai is home to one of the last great King salmon runs in the world and we have a moral obligation to choose their preservation over the very minimal economic impact of commercial fishing.

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.

Max Handley  
Kenai  
99635



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February 15, 2022

Dear Board of Fish,

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?

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McKinley Holtan  
99503



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February 18, 2022

Dear Board of Fish,

Recommend not passing this bill. Think long term. Follow the science not the money. We are long term residents and want to see our kings return

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.

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.

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Meredith Johnson

Anchorage  
99507



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February 27, 2022

Dear Board of Fish,

My name is Michael Ahart and I live in La Grange, TX. Please do everything possible to protect and improve the fisheries of Alaska with emphasis on the Kenai River. As we all know, this a truly unique and special resource worthy of protection and 283 is a poor idea.

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.

Michael Ahart

La Grange  
78945



Submitted By  
M chae Kurtz  
Submitted On  
10/4/2021 3:52:45 PM  
Aff at on

1. Attn; Board Members;

- My name is M chae Kurtz. I am presently a active arema m purse se ner. dr fted arema m for 4 years . and have purse se nerred for 51 years.
  - oppose an agenda change request for th s year rather than or norma cyc e. A though Ch gan t met ts excement goa s and f shed everyday the ater part of the season they are request ng a agenda change. w th cov d st a factoer and th s meet ng would be v rtua . wou dn't be here to have th s meet ng on schudue where hopefu uy we cou d be n person? wou d say n person nteract on wou d be much better for nformat on.

n my 51 years n arera m have seen many d fferant scenar eous, mean ng weather / feet s ze f sh ng t me/ d fferant caps/area c oaures. after a we have done noth ng stands out as someth ng that effects ch gn k for the better or worse. cou d t be that back ake s hav ng env ronment prob ems and they need adjust there escapament goa s? Cou d t be they need a mangement p an where they f sh outs de and make a v ng unt the agon a adjustes? Now they want to have more c osures n the Shumag ns s ands wh ch the wass p study showes hasn very tte mpact on ch gn k.

The th ng about the Shumag n s and s that there are on y a few sets. So when you have a sma feet or arge feet they a end up on the same sets and catch does not change dramt a y. As for the agenda change request regurad ng the June chum catch, fee there s no cause for that. Both the 1987. tagg ng study and recent y the waass p study show the june f sher narema m has tte effect on ayk summer and fa chums. on the years where we have a sp ke n june chum catch they are usa y arge y compr sed of 2 to 3 pounds,wh tch are Hoka do and Russ an. I thank the board members for rerad ng my comments.

M chae Kurtz owner/sk pper F/V N cho as M chae





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February 17, 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.

Michael Logan

PalmerPalmer  
99645



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February 17, 2022

Dear Board of Fish,

Hello, I am a born and raised Alaskan. I love to participate in local fishing opportunities. Over the years the option to target a King Salmon off the road system has dwindled to a very small chance of success. We, my family would love to see these fish come back to fishable numbers. Maybe we could limit trawlers in our waters to help protect our King Salmon. Just a thought.

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.

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.

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Michael Logan

Palmer  
99645



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February 26, 2022

Dear Board of Fish,

Hi, I am from southern Illinois and only get up to Alaska every couple of years and it is important to keep the sport fisheries thriving, So many of the King Salmon fisheries are pressured too much already without adding more commercial fishing. There is more gain made from sport fishing than meets the eye, it starts with airfare and ends in the mom and pop places where a few bucks are spent.

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.

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Michael Logue

Brownstown  
62418



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February 22, 2022

Dear Board of Fish,

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 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?

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Michael Peacock

Kasilof  
99610





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February 15, 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 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.

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Michael Schierman

Wasilla  
99623



Submitted By  
Mchae Towe  
Submitted On  
2/12/2022 10:26:09 AM  
Aff at on  
F sherman

Chairman and members of the Board,

My name is Mchae Towe. I have lived and commercially fished salmon out of Cordova for the past 17 years. My wife and I, along with our 3 young children, have been participating in the PWS shrimp fishery for going on 4 years. We operate in this fishery aboard our 32 foot bow picker.

### Proposal #238 Oppose

### Proposal #247 support

As a commercial fisherman, I would like to see management strategies undertaken which would optimize the efficiency of the fishery. More pots would mean a shorter season and less overhead for the commercial users. My family and I currently enjoy the fishery as time together on water, but it has little economic value due to the inability to efficiently harvest the GHL in a timely fashion. I would like to see management strategies that would optimize the commercial viability of this fishery.

In my experience, this fishery can support a higher potential. A higher minimum potential of 50 seems a reasonable starting point to give the users a greater chance to find and harvest the quota in a more timely fashion.

The potentials each season have been adjusted based on registered participants. It seems that may be a fine strategy for the sport user group, but in a commercial fishery it decreases the economic incentive to go out and harvest the resource (which is already capped by the GHL anyway). With the current potentials, an average 3 day trip typically yields \$226 after \$824 of expenses. If the potential were increased to 50, then a 3 day trip would yield **\$1216** after \$884 of expenses. (Please see the financial breakdown at the end of my comments for a picture of profits/expenses from a typical fishing trip on my vessel).

As the fishery stands right now, it is difficult to realize much of a profit with drawn out seasons and potentials that retard the pace of the fishery. **A management strategy in which opener lengths are adjusted according to the number of pots registered to be fished would make for a more viable commercial fishery.**

### Proposal 248 Support

### Proposal 251 Oppose

### Proposal 252 support

As a commercial shrimp fisherman, much of my overhead in this fishery is fuel. It is very inefficient for each vessel to run small quantities of shrimp on long distances to make a landing. Most of the fishing areas that are open are far from any place one can land and sell shrimp. A vessel can only hold shrimp for a short time unless it has the ability to freeze on board. This forces us to run our product on long distances at a high fuel cost. With current potential restrictions, it is highly probable that a single vessel will catch enough shrimp to justify the cost of returning to port to make a delivery. Often, I am happy to break even in this fishery. This is not economically sustainable from a commercial standpoint.

The ability for a catcher vessel to tender shrimp for others would allow the vessels which are participating to at least strategize or work together to realize profits and keep the overhead reasonable.

### Concluding Thoughts

My wife and I are fishermen raising 3 children in Cordova. We began participating in this fishery to see if it could serve as a means to supplement and diversify our fishing income. This fishery has been an amazing opportunity for us to enjoy time on the water as a family, but needs a few changes to be commercially viable.



From an **economic** standpoint, I would quit this fishery. The reason my family and I continue to operate in this fishery is because we have a blast with our kids exploring the sound looking for shrimp. But this is a commercial fishery. We are also trying to run a business. I have heard from other fishermen things like, "I'm happy to break even" or "I just want to get my home pack". This mentality does not make for a thriving industry. There are a few regulatory changes proposed which could turn this narrative around and allow fishermen to realize some profits in this fishery. **Regulatory changes which increase the economic feasibility of this fishery, while maintaining sustainable management strategies, would be a huge benefit to commercial operators.** Thank you for your time.

## An example of the economics of this fishery

I present the following example of the economics of this fishery based on numbers from historical data from ADF&G surveys as well as from my own commercial experience. I have listed all the numbers used so one can see the breakdown, but what's important here is the value of the catch versus the overhead. I will use my vessel's data regarding fuel consumption and runtime. This year's fishery will be in area 1 so I'll run the numbers as though fishing in Unakwik.

A reasonable catch per pot usually hovers around 2 pounds of white shrimp per pot for a 24-hour soak (note: fish and game's survey pots soak for about 20-22 hours per "Operational Plan: Assessment of Spot Shrimp, Panda uspatyceros, Abundance in Prince William Sound, 2015 through 2017"). Typically, we take the shrimp on water and lose roughly half the weight. I sell take-and-leave shrimp for \$14 a pound to a processor. Let's assume a 25-pot limit as was in place in 2019. Unakwik in Area 1 is roughly 80 nautical miles from my landing port of Cordova. I typically travel at 20 knots when laden with pot gear and burn 19 gallons of fuel per hour at that speed. I can typically hold shrimp for up to 3 days. Okay, let's run the numbers for what may be considered an adequate or average catch:

### Pot pulls per trip

Pot limit: **25 pots**

Soak time between pot pulls: 24 hours

Days fished before needing and going: 3 days

Number of Pot pulls: 75 pots

### Total Value of Catch per trip

Catch per pot: 2 pounds white shrimp

$$2 \text{ lbs/pot} \times 75 \text{ pots} = 150 \text{ lbs}$$

Total harvest of white shrimp: 150 pounds white shrimp

Total harvest adjusted for take: 75 pounds

Price per pound take-and-leave shrimp: \$14 per pound

$$75 \text{ pounds} \times \$14 \text{ per pound} = \$1050$$

## Total value of catch per fishing trip (landing)= \$1050

**Cost of trip** (Note: For simplicity I am only showing the major costs. The actual overhead is slightly higher)

## Fuel

Distance traveled to and from fishing ground (round trip): 160nm

Speed traveled: 20 nm/hr

Time traveled: 8 hours

Fuel burn rate: 19 gal/hr

Fuel burned traveling: 152 gallons

Fuel burn on fishing days: 12 gallons per day for 3 days = 36 gallons

Total fuel: 188 gallons

Fuel Cost (at \$4 per gallon): **\$752**

## Gear

Per Boat: \$60

Fishers: \$25

## Total overhead for 1 trip prior to landing: \$824

$\$1050 - \$824 = \$226$

## Total Profit= \$226 per 3 day trip

This profit per trip for time spent on water does not make sense from a business standpoint. Yes, it is possible to do better, but also much worse. These numbers I present are representative of fairly typical shrimp fishing. However, this is not reflective of a lack of the resource. **It is reflective of gear efficiency.** If one were to run the numbers with double the spots, then one can see how the math begins to pencil out for a viable commercial operation.

Value of catch would go to \$2100 where the overhead per trip would remain fairly the same other than bait (another \$60). So the same length trip could yield **\$1216** (versus the previous \$226). Now the fishery begins to make economic sense.

Furthermore, shrimp boats were allowed to be tenders for each other, suddenly overhead decreases by a huge margin. Some boats could eliminate the need for a towed trawl and could save upwards of \$750 per 3 days on water. A vessel such as mine could then expect to earn **\$2,000** per 3 days on water on average. From a management standpoint, this would decrease the season length, but greatly increase profitability.

I have heard some fishermen like the season lengths protracted so that they may participate in the fishery as time allows. Some like to keep pots so they can easily manage a smaller number of pots. There is a subsistence fishery and sport fishery to serve this exact purpose. A commercial fishery is supposed to be of economic benefit for the users and the state. Specifically, **Proposal 247 and proposal 252** would make for a more viable commercial fishery from an economic standpoint without excluding any of the current user group.

If there are any questions concerning my comments I'd be happy to take them over. I can be reached at (907)253-6453. Included this as bait as I felt this is the bottom line of what we as a fishing fleet are dealing with as **commercial** operators. I know every fisherman's vessel and market situations vary so there is certainly some different numbers, but this is how it looks for many of us.



March 01, 2022

Dear Board of Fish,

Michael Tuhy here... I have been sport fishing the Kenai @Tower Rock Lodge for 31 years and seen lots of changes and sadly, the diminished King populations. If you follow strictly the biological science and the economical data it is impossible to arrive at any other conclusion... let alone the future importance of tourism.

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.

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.

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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.

Michael Tuhy

Soldotna  
99669





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February 19, 2022

Dear Board of Fish,

I live on the Kenai River and I hate seeing the extermination of the Kenai Kings. Action must be taken protect the species for our river. The pressure from the commercial fisheries is too much. If action is taken now to help, the population can rebound and everyone can benefit. If nothing is done, there will be nothing left to protect and nobody can enjoy the Kenai Kings.

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.

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.

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.

Michael Watson

Sterling  
99672





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February 25, 2022

Dear Board of Fish,

I've lived in cooper landing and now Girdwood. I fish the Kenai during the spring summer and fall for catch and release trout and steelhead. I harvest some sockeye. I quit targeting king salmon 12 years ago because I saw a drop in their survival. I figured the state of Alaska could manage this fishery better. But seeing this proposition disgusts me. Bycatch is a huge problem in the fishery industry and to let commercial nets go out during a time when kings need to get up the river is absurd. There's rules that are set out and the commercial fishery should abide by them also and remain closed as sport fishing is. The sockeye use the same route as the kings! Come on quit killing the kings, they are a special breed.

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.

Michelle White

Girdwood  
99572



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February 15, 2022

Dear Board of Fish,

I am a born and raised Alaskan. While I live in Anchorage, I am also a land owner on the Kenai River. As we have all seen the decreasing King run and strong Sockeye runs, I understand the position you are faced but I would like to urge you to consider the need to rebuild and protect the King run. The King run is vital to the economics of the Kenai Peninsula.

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?

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.

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Mike Brown

Anchorage  
99515



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February 16, 2022

Dear Board of Fish,

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?

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Mike DeMaria

Greensboro  
27406



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February 17, 2022

Dear Board of Fish,

I travel all the way from Pennsylvania to fish the Kenai River for kings. All this would do is reduce my chances and my friends' chances to catch a fish of a lifetime. We are all opposed to proposal 283. Thank you.

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.

Mike Drewnowski

Franklin  
16323



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February 16, 2022

Dear Board of Fish,

I live in Sterling Alaska. I have fished the Kenai River since the early 70's. I think it very important, not only me but to future generations, that responsible, balanced management of Alaska's fisheries is critical to improving the Kenai River Fishery.

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?

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Mike Griffin

Sterling  
99672





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February 16, 2022

Dear Board of Fish,

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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.

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.

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Hansen Mike

Price  
84501



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March 12, 2022

Dear Board of Fish,

I was born and raised in Alaska since 1957. I fish and hunt all over the state and have property on the Kenai and Chulitna rivers.

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 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?

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mike huston

anch  
99501



March 08, 2022

Dear Board of Fish,

I lived in Alaska from 1997 until 2004. As an avid outdoorsman and outdoors enthusiast I spent a significant amount of time on the Kenai Peninsula fishing. The river was under serious pressure back then from both the commercial harvest of King Salmon as well as the sports fishing. It was declining but nothing like today. I continue to visit Alaska every summer for at least one month. I spend thousands of dollars supporting the local economy. However as I walk through the stores I don't see near the number of people that I saw back then during July and August. At one time you could find a parking spot at any of the boat launch areas unless you were there by 4 am. Now there is no problem finding a spot as there are far less people traveling to Alaska to fish the Kenai river. As a sportsman in all my yrs fishing the Kenai I have kept 1 King Salmon and it was an under 30" fish that had a hook down in it gills from being caught previously. Otherwise I would have released it. When the river shuts down to sport fishing including catch and release for Kings things are so bad that every fish makes a difference. To allow the commercial fishing to continue at this point makes absolutely no sense whatsoever. To vote yes on prop 283 is not the the beginning of the end to the Kenai King salmon because that is already in motion. Yes to 283 is THE END of the Kenai Kings. Vote No and protect this species for generations yet to come.

Thanks

Mike

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.

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.

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.

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on this proposal. Stay the course and protect the kings.

Mike Kasecky



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February 20, 2022

Dear Board of Fish,

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.

mike marlatt

Pillager  
56473



Submitted By  
Mike Sullivan  
Submitted On  
3/5/2022 2:00:40 PM  
Affiliation  
Resident  
  
Phone  
907 602 2577  
Email  
[ms\\_fagship@yahoo.com](mailto:ms_fagship@yahoo.com)  
Address  
10647 Fagship Circle  
Anchorage, Alaska 99515

PWS Shrimp Fishery:

Greetings---I'm a 50 year Anchorage resident who enjoys local seafood, especially the sweet shrimp from PWS. This delicacy is a rare local seafood that can be enjoyed fresh from the ocean. I'd like to offer comments on the proposals before you that would limit my ability to purchase this product from local fishermen. Specifically I strongly support Proposals 240, 242 and 246.

I also support Proposals 244 and 245 to increase the ability of ADFG to manage the noncommercial shrimp fishery in concert with the management of the commercial fishery. This is critical to ensuring healthy harvest levels for this important resource and a valuable paying feed.

I'm a senior citizen without the expensive or expensive boat that's required to participate directly in this local fishery. It's not only too expensive but impractical for a 68 year old and unable to safely operate a vessel to access the dangerous waters of PWS. My ability to secure this common property resource depends on being able to purchase shrimp from local fishermen. It's grossly unfair that current harvest limits apply only to commercial fishermen thereby limiting myself and most other Alaskans ability to consume this special treat, while the best boat owners consume, give away and keep even substantial amounts of PWS shrimp.

Currently the availability of such shrimp is often limited to a few weeks a year. Some years much less time, in rare years a little more. I'd appreciate a longer season with more reliable delivery dates. Current management is skewed towards the sport fishery to the detriment of the vast majority of Alaskan residents in general and area residents in particular. All users should share in the conservation of and access to this public resource. The BOF should adopt policies that protect shrimp populations and share the burdens of conservation. Current management is very unfair to all nonboat owners.

I appreciate your consideration of my comments and look forward to the BOF adopting an equitable management strategy for this important local fishery. Thanks much





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February 16, 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.

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 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.

Mike Wheat  
Soldotna  
99669



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March 02, 2022

Dear Board of Fish,

This should not even be a proposal, the state of Alaska needs these Salmon to bring life back to the community, and the people of the world. Also my grandchildren need to know the thrill of fighting one of these magnificent King Salmon .

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.

Monte Kiggins

Anchorage  
99517



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February 17, 2022

Dear Board of Fish,

I've traveled to Alaska fishing 40+ times. Look at the king numbers from 2001. Don't destroy the fishery anymore just for money

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.

Monte Wzite

Billings  
59102



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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I am from Chignik Bay and have fished with my Dad since I was a little girl. I am trying to save up money to pay for college after I graduate from high school. These past few seasons have made it hard to do so. Everyone in Chignik is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. Our economy is built on our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for the Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

*Mylia Kopun*



Submitted By  
Nancy H strand  
Submitted On  
3/8/2022 11:42:11 PM  
Affiliation  
Pioneer Alaska Fisheries Inc.

Phone  
907-399-7777  
Email  
[bear@alaska.net](mailto:bear@alaska.net)  
Address  
Box 674  
Homer, Alaska 99603

## Hatchery Committee Meeting

Pioneer Alaska Fisheries Inc.  
Box 674 Homer, Alaska 99603  
907-399-7777  
March 8, 2022

Greeting Board of Fisheries

1. Please consider applying the Sustainable Salmon Policy 5 AAC 39.222 as a guide for the Hatchery Committee to create specific frameworks for meaningful non-regulatory actions for hatchery issues of concern.

5 AAC 39.222(a)(3) To effectively assure sustained yield and habitat protection for wild salmon stocks, fishery management Plans and programs require specific guidance principles and criteria, and the framework for the recruitment contained in this policy.

Three concerns that would be addressed with a framework are to

1. determine acceptable or unacceptable stray rates,
2. transparently archive hatchery data and activity on the ADFG website
3. Rebalance Regional Planning Teams ADFG voting members with backgrounds in ecology genetics and other specialties.

Alaska has specific hatchery guidance principles and criteria in our laws and policies to assure sustained yield. Few comprehend and apply hatchery principles and criteria, because most have never read the complex hatchery laws and policies so application anguishes or is not consistent.

Hatchery Fishermen are confused by the lack of framework that carries there is more than **Economy** involved in artificial production of salmon. There is also **Ecology** and **Genetics** purposefully designed into law to effectively assure sustained yield of wild salmon starting with the mandated intent of the PNP Hatchery Act.<sup>[1]</sup>

When these laws and policies were created, they were attended by 147 ADFG personnel of the FRED<sup>[2]</sup> Division. This army had no harvest constituency but was disbanded in 1991, so the ADFG oversight over hatchery laws has been fragmented ever since.

Just stating "we follow the laws" without following the laws, jeopardizes salmon. It needs application.

The Sustainable Policy asks for a "framework for the recruitment contained in this policy". The Hatchery Committee can begin to provide with the department, this structure of guidance to apply these principles and criteria.

## Acceptable stray rate

Mark tag ab hatchery stray sampling proportion data needs to get off the shelf and be integrated into guidance principles and criteria using the anadromous waters catalogue for a living working structure designed to ensure wild fish productivity and genetic diversity is not overwhelmed further by hatchery fish genetics.

There is a sorely needed specific framework to guide the department on a defined acceptable or unacceptable rate of straying under the hatchery permits. This problem has no consistency to align with the Genetic Policy, Comprehensive Plans, Escapement Goal and the Sustainable Salmon Policy. Presently this known risk to wild salmon has no metric.

For the application of sound, precautionary, conservation management practices,<sup>[3]</sup> unacceptable straying in wild systems can use the framework already available of the interactive anadromous waters catalogue by applying a GIS layer where the Mark Tag Lab photo



sampling results of straying can be applied and a scaling software that “considers factors including environmental change, habitat loss or degradation, data uncertainty, limited funding for research and management programs, existing harvest patterns, and new fisheries or expanded fisheries”<sup>[4]</sup> which in hatchery terms means remote releases.

**Archive Hatchery Data** Means having easy access to information open to the BOF, the Department and the public to provide history of annual Management Plans AMPs, Permit Allocation Requests PAR, Regional Planning Team minutes, Hatchery Permits, Hatchery Service Contracts, egg sales, etc.

**Regional Planning Team diversity of knowledge creates balance for sustained yield of wild fish priority.**

Thank-you for your consideration.

Please consider putting together a task force that can help

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<sup>[1]</sup> PNP Hatchery Act Section 1. INTENT. It is the intent of this Act to authorize the private ownership of salmon hatcheries by qualified nonprofit corporations for the purpose of contributing, by artificial means, to the rehabilitation of the state's depleted and depressed salmon fishery. The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.

<sup>[2]</sup> Fisheries, Rehabilitation, Enhancement and Development Division

<sup>[3]</sup> 5 AAC 39.222 (a)(1)

<sup>[4]</sup> 5 AAC 39.222 (a)(2)



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February 18, 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.

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?

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.

Natalie Casebeer

Soldotna  
99669



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February 25, 2022

Dear Board of Fish,

This measure supports no local community with regards to future consideration. Weaker returns will result in loss of kenai kings for our youth and future generations.

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?

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Nathan Blome

Anchorage  
99516



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February 15, 2022

Dear Board of Fish,

Please figure out a way to catch sockeye without continuing to endanger the genetically unique Kenai kings. Kenai kings are iconic and deserve so much more protection than they are given. Please for our childrens children find a better way to harvest sockeye without endangering kings. Thank you!

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?

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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.

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Nathaniel Sims

Albuquerque  
87106



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February 17, 2022

Dear Board of Fish,

I am Nick Ohlrich co-owner of Alaska Drift Away Fishing. We have been guiding the Kenai and Kasilof for 18 years. Our business stopped targeting native run king salmon on the Kenai and Kasilof rivers in 2013. The deciding factor for us to stop was the brilliant ideas of BOF to reduce the in-river escapement from 25,000 to 15,000 kings "in order to preserve the late-run Kenai Kings. Really? How does reducing the escapement help? I see how the reduction allows for more net time, more money to be made on the COM end, but fail to see how this helps King Salmon.

Here we are again, BOF wanting to reduce the escapment for Kenai Kings. I'm assuming this is for the benefit and sustainability of Kings, as it was super effective when it was cut in half during the BS meeting in the winter of 2013.

I understand that managing a resource with intense Sport and Com interests like the Kenai is not easy, and will never please everyone/anyone. Which in a sense, should make regulating the resource with integrity and ethics easier. Fish first should be the mentality. It is fun to talk about sustainability, ethical management, etc, but unfortunately actions speak louder than words. The actions of the past decade and beyond by ADFG and BOF do not support sustainability, ethics, or integrity. They do showcase greed, deep self interest, and corruption.

Being a guide or a commercial fisherman is a choice and privilege, not a right. Most seem confused by this. If your family has been doing this for generations it still does not become a right. Destroying a species because "I have to feed my family, or I have bills to pay" is not good enough. Get a real job.

Depending on a fish that is born in a river, then swims around the ocean for several years, to come back to that river to spawn, sounds like a sustainable career, then [REDACTED] is deeply intertwined in your DNA makeup.. A fun way to make money, but [REDACTED].

I also know that the majority of the problem stems from ocean conditions as I have dug fairly deep into the topic trying to gain more understanding. Which is much harder than blaming the set netters or King guides for the depletion of Kenai Kings. In my opinion if BOF/ADFG actually did their jobs with ethics and intergrity and made a strong stance to preserve Kenai Kings when they had the chance in 2013 the King population would be better but not by leaps and bounds. Surely the thousands of Kings that went into COM nets and Guide boats since 2013 would have been better to let spawn.

So what is the prupose of reducing the escapement again? Are facts painting a picture that the current escapement of 15,000 will definitely keep the King fishing closed on the Kenai and restrictions on the Com industry, which equals less money for Com for the future?

It seems fairly obvious that the state of the King run really cramps the Com balance sheet. Why not take off your sustainability mask and just kill off the run and be done with it versus this slow bleed and trying to act as tho BOF actually cares. I'm sure this would be the best option for BOF.

Let me guess a new escapement of 7,000? I'm sure part of the deal will allow Kenai guides to keep





fishing too. GEEZZ thanks!. In a few years from now what will be the move once the Kenai gets shut down due to it not meeting the new escapement? Or will this new escapement be the one that turns the run around and we'll be back to a robust return of 50,000 kings?

The fact that we are in this situation, and I'm spending time writing this to a board that obviously does not care is disquisting. SO BOF here is your chance to do your job with ethics and integrity. How will you know if your are operating under those measures? Easy, it will be a sensation that noone on the board has ever felt.

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.

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.

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?

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.

Nicholas Ohlrich

Girdwood  
99587



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February 25, 2022

Dear Board of Fish,

Please vote no on

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.

Nicholas Peters

McCleary  
98557



Norine Jones  
111 Airport Road  
Chignik, Alaska 99564

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

January 15, 2022

I support Board of Fisheries Proposal 282 and ask that you likewise support it.

The following is offered on why Proposal 282 should be passed:

1. Chignik is totally dependent, culturally and economically, on its Chignik River early and late sockeye salmon runs;
2. Chignik's early run has met not the lower end of the escapement goal for the last four years. Failure to meet escapement goals, in back to back years, expectedly will bring future hardships;
3. No Chignik sockeye salmon fishery has occurred on the early run and in only two of the last four years on the late run;
4. In Area M, early-run Chignik sockeye salmon are a viable component of the Dolgoi Island Area and Shumagin Islands catch from mid-June through July (ADF&G WASSIP);
5. The Shumagins and Dolgoi fisheries currently lack any regulation addressing stock conservation, specifically terminal-stock escapement requirements.
6. Under the Sustainable Fisheries Policy the burden of conservation is supposed to be shared and;
7. Chignik stakeholders need relief from carrying the entire conservation burden and Proposal 282 provides a solution.

Please pass Proposal 282.

Thank you and sincerely,

*Ms. Norine Jones*





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February 23, 2022

Dear Board of Fish,

I am an Alaskan that feels it is important that conservation efforts should be shared equally by all users groups.

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.

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.

Norman Straub

Palmer  
99645

Corporate Office  
2702 Denali St., Suite 100, Anchorage, AK 99503  
Phone: (907) 278.6100 Fax: (907) 276.3441

March 2, 2022

Via: Email and FAX

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

RE: Proposal 266 [Dungeness Crab Pot Limitations]

Dear Chairman VanDort and Board members:

We support proposal 266 as modified by the Kodiak Advisory Committee.

Dungeness fishing on Kodiak Island, due to our large sea otter population, is mostly limited to a relatively small area on the east side of the Island around Old Harbor and on the south end of Kodiak Island. The fishing effort in these areas has increased exponentially in the past couple of years ---- both the number of vessels fishing and the number of pots being fished by each vessel. In some areas, tenders are having a difficult time navigating between the Dungeness pots to pick up salmon and in other areas, salmon fishermen are pre-empted from fishing traditional spots because of the Dungeness gear. Finally, small boat Dungeness crab fishermen from Old Harbor are finding it increasingly difficult to find places to fish.

Consequently, Old Harbor fishermen submitted proposal 266 and strongly support a Dungeness pot limit for the Kodiak area. We had suggested a range for the Board to consider and differentiate between larger and smaller vessels --- with some deference to a couple of larger local vessels that had been fishing Dungeness crab for many years. The Kodiak Advisory Committee had a lengthy and robust discussion on the issue. There was significant consensus regarding the need for a pot-limit but less unity regarding differentiating between larger and smaller vessels. The larger pot limit for larger vessels was seen to advantage some newer entrants in the fishery and may also attract larger vessels to the fishery --- both of which the Advisory Committee didn't want. In the end, the Advisory Committee compromised on a recommendation of a 700 Dungeness Crab pot limit for all vessels.

Old Harbor still believes that the 700-pot limit is too large. However, we also feel that it's more important to immediately have the Board approve a pot-limit than it is to argue about further





reductions. This is the substance of compromise. We believe the Advisory Committee's compromise is a reasonable first step toward solving the issue of too many Dungeness pots.

If you have any additional questions regarding Old Harbor's support for the Advisory Committee's compromise recommendation on proposal 266, please do hesitate to contact me.

Very truly yours,

Freddie Christiansen, Chairman  
Old Harbor Native Corporation  
Fisheries Committee



**PACIFIC NORTHWEST CRAB INDUSTRY  
ADVISORY COMMITTEE (PNCIAC)**

March 3, 2022

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

Re: PNCIAC Recommendation to Board of Fisheries on Proposal 275

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (BOF) and North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors. PNCIAC, since its beginnings, has worked with the BOF, Alaska Department of Fish and Game (ADFG), the National Marine Fisheries Service (NMFS), and the NPFMC. Together, PNCIAC and the agencies have worked together to improve resource management.

**Proposals 275 (Observers)**

PNCIAC supports this proposal to extend the observer certification expiration period from 12 to 18 months. This proposal was submitted by ADFG and is intended to help retain good observers.

Thank you in advance your consideration.

Regards,

Steve Minor  
Chair  
PNCIAC  
[stevem@ppsf.com](mailto:stevem@ppsf.com)

March 10, 2022

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

RE: Opposition to Proposal 282

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Statewide shellfish meeting scheduled for March 26 – April 2. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including those that serve fleets in both the Chignik and Area M salmon fisheries. **We respectfully request the Board delay taking action on Proposal 282 and instead consider the proposal during the appropriate in-cycle meeting in 2023.**

Proposal 282 requests further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area and will thus have a significant negative impact on Area M fishermen, processors, and the communities dependent on these fisheries, such as Sand Point and King Cove. These fisheries are critically important to this region, so any further harm should be avoided or at least very carefully considered against other direct impacts.

The Board already (2019) increased the closed areas for all gear types in the South Peninsula June fishery and completely closed the Dolgoi area to seining in June, and there has not been sufficient time for the Board to evaluate whether these actions have had the intended effect on Chignik runs. In addition, there is evidence that a stronger contributor to the strength of the early-run Chignik sockeye fishery seems to be associated with habitat degradation in Black Lake and the corresponding length, weight, and overall condition of out-migrating smolt, which has been poor from 2007 to 2016. The Board should not support a proposal that results in further direct economic harm to the Area M fishery and communities, especially given the lack of clear, corresponding benefit.

There also does not seem to be a downside to delaying review of this proposal until the in-cycle meeting. The proposal is not necessary to address a conservation concern but is allocative in nature according to the ADFG staff comments. Late-run and total escapements were achieved in 2021, and total season sockeye escapement is near the five-year average and increased relative to the three-year average. The ADFG forecast is that Chignik runs will meet escapement in 2022, with an early run of 639,000 sockeye (escapement of 400,000 and harvest of 239,000). If a concern arises, ADFG could continue to use its existing emergency authority to enact further restrictions in Area M, evidenced by

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[www.pspafish.net](http://www.pspafish.net)

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202 431 7220



such actions in 2018 and 2020. Given this and given the complexity of salmon management in Areas M and L, it does not seem necessary or prudent to take immediate action at this meeting.

Waiting until the established meeting cycle is not only good public process but it will allow the Board to consider action in the context of ADFG's review of the Chignik escapement goals, which are being completed for the 2023 meeting cycle and may provide relief to Chignik fishermen. This seems like an extremely important factor to consider. In 2023, the Board can consider the full suite of information, including potentially new escapement goals, and all proposals related to these areas relative to each other.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Barrows".

Chris Barrows  
Pacific Seafood Processors Association



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February 16, 2022

Dear Board of Fish,

I run fishing lodges in Bristol Bay.

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.

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.

pat vermillion

Livingston  
59047





March 11, 2020

Dear Esteemed members of the Board Of Fisheries,

My name is Patrick Brown and I am writing to you in opposition of Proposal 282, formerly known as ACR 7. The economic impact of this proposal will be devastating to the fishermen of Area M, and will likely have a negligible impact on the strength of the Chignik run.

The South Unimak/ Shumagin Islands salmon fishery has been executed under our current management plan, with certain amendments, since 2004. From the years before Limited Entry, through the 80s, our schedule more closely resembled a 5 days per week of fishing opportunity across the South Peninsula waters. Up until 2018, Chignik has had a relatively stable and successful fishery, with virtually no escapement issues throughout its entire history. How can two relatively successful fisheries, which have co-existed for decades adjacent to each other, all of a sudden have a devastating impact on the other?

I believe there are larger ecological and environmental factors at play here, which need to be carefully looked at before we give Area M fishermen sole responsibility for the damages which have occurred in Chignik.

The Forecasted run for the entire Chignik area in 2018 was 1.749 million fish including 738,000 escapement and 1,011,000 harvest. The actual escapement for the year was 539,697 and barely any harvest occurred that year of sockeyes. In the Shumagin islands June Fishery of 2018, 406,806 sockeyes were harvested. In the post June fishery for the entire South Alaska Peninsula, 514,396 sockeye.

Even if every sockeye caught in the Shumagin Islands June and S. Alaska Peninsula Post-June fishery were Chignik-bound (Stock composition data from WASSIP does not support this), it still leaves the question, what happened to the other 288,101 sockeyes? In reality, Black Lake-bound sockeye salmon make up a small component of fish harvested in the Shumagin Islands, and it is very unlikely that this is the case.

While there is no definitive data on where these fish went, scientific data suggests that environmental conditions in the North Pacific may have played a role in the decline of certain stocks of finfish, and abundance of planktonic pyrosomes may have had an effect on ocean conditions resulting in the decline of salmon species.

According to a 2019 article on [science.org](https://www.science.org) website, entitled "Ocean heat waves like the Pacific's deadly 'Blob' could become the new normal," scientists began observing warmer than normal temperatures in the North Pacific, starting in late-2013. This trend continued through late-2016, resulting in ecological collapse from the bottom of the food chain up. In 2017, scientists from NOAA published their findings: 100 million cod fish had "vanished." The heatwave of water, known colloquially as "The Blob," had wreaked havoc on the food chain. It is estimated over half-million seabirds died off, washing up on beaches across southern Alaskan shores. As a result of this heat wave, toxic algae blooms had formed over



much of the north Pacific, and sea creatures typically found in the tropics had emerged much more north than they normally do.<sup>1</sup> These sea creatures are known as pyrosomes, aka sea pickles. According to a 2017 Newsweek article, “Mysterious Sea Pickles Invading West Coast in Bizarre Bloom,” scientists worried that the emergence of pyrosomes, aka sea pickles, and their impending die-off, could result in oxygen depletion due to the decomposition of organic matter. This is basically how the dead zone in the Gulf of Mexico was created, through rapid death and decay of organisms.<sup>2</sup> The emergence of these organisms is simply a symptom of an overall ecological problem.

As a set gill netter, I recall many years in recent history of algae blooms in the ocean and the formation of a mud-like material that would stick to our set net web. The material that stuck to our web made it visible in the water to fish, but I believe it also made the water less habitable and either made the salmon leave the area all together, or was a symptom of a larger problem which was high levels of toxicity and low level of available food source. The PSP studies that occur from our local clam beds through our local tribal organization are further proof that PSP levels are dangerously high and have been for several years. Either way, we have definitely seen the impacts of the “Blob,” and our fishery has suffered as such.

Furthermore, an environmental study done by the Army Corps of Engineers, published in October 2012, entitled “Black Lake Ecosystem Restoration Technical Report”, conclusively states: “The average volume of Black Lake over the past 50 years is estimated to have decreased by approximately 25 percent due to the lowering of the average lake water surface elevation with an additional 1 to 5 percent reduction due to lake sedimentation.”<sup>3</sup> However, the Biological escapement goal (BEG) of 350,000-450,000 fish, which has been in place for over half a century, has never been adjusted. With regards to the Proposal 282’s language of the anticipation of the “mid-point” of the run, which refers to the escapement of 400,000 sockeye,

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<sup>1</sup> “Ocean heat waves like the Pacific’s deadly ‘Blob’ could become the new normal.” Cornwall, Warren. 31 Jan 2019.  
<https://www.science.org/content/article/ocean-heat-waves-pacific-s-deadly-blob-could-become-new-normal>

<sup>2</sup> “Mysterious Sea Pickles Invading West Coast in Bizarre Bloom.” Main, Douglas. 22 June 2017  
<https://www.newsweek.com/mysterious-sea-pickles-invading-west-coast-bizarre-bloom-628338>

<sup>3</sup> “Black Lake Ecosystem Restoration Technical Report.” Army Corps of Engineers Alaska District. October 2012. P. 47.  
<https://www.poa.usace.army.mil/Portals/34/docs/civilworks/archive/BlackLakeTechnicalReportOctober2012.pdf>



ADFG data shows that in the years from 1970-2020, in 26 out of 50 years, the escapement did not exceed 400,000 fish. <sup>4</sup>

As a fisherman, I understand the frustration felt by weak runs, slow fishing, and lack of opportunity. The current fishing schedule we fish in the South Alaska Peninsula is never a guarantee of catching, but it is what we have operated under for years. Even after Limited Entry allocated our fishery, we have continued to see loss of time, area, and opportunity since the Permit system was enacted. We shouldn't have to be punished because of problems associated with other areas. In 2018 and 2020, we lost significant amounts of fishing time with negligible benefit to the CMA and the sockeye runs there. We have shared the burden of conservation, with minimal results, yet many will lead you to believe this is not the case.

I am a South Peninsula (Area M) fisherman, and I strongly urge you to oppose Proposal 282. There is no scientific evidence that shows that we are to blame for the collapse of the Black Lake run. It's time we start to listen to what the science says, instead of pointing the finger at others. Our ocean is still healing from the heatwave that occurred between 2013 and 2016, but any policy changes you make now could hurt our fishery for years to come.

Thank you for your time and consideration.

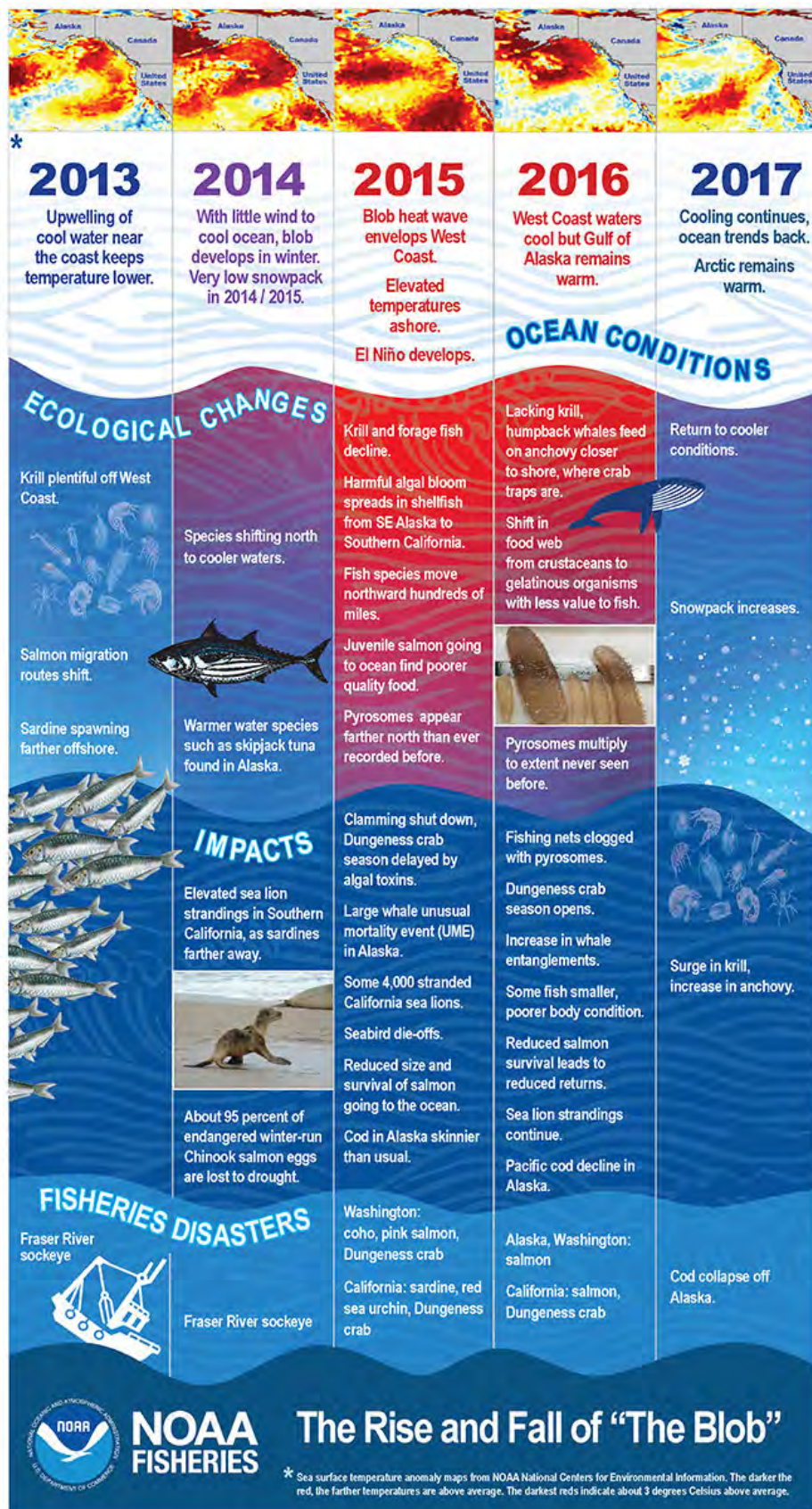
Sincerely,

Patrick Brown  
Sand Point, AK

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<sup>4</sup>"Chignik Management Area Salmon Annual Management Report, 2020"  
Ross L. Renick and Michelle E. Stratton. November 2021. P. 50.  
<https://www.adfg.alaska.gov/FedAidPDFs/FMR21-11.pdf>







Submitted By  
Patrick P McCormick  
Submitted On  
3/3/2022 2:03:37 PM  
Affiliation

Phone  
9072407285  
Email  
[mccormick.patrick@gmail.com](mailto:mccormick.patrick@gmail.com)  
Address  
10207 Chatham of Rock St  
Eagle River, Alaska 99577

P238

I oppose this as it has no biological or management reason for the closure.

P240

I support this proposal as it fairly allocates the resource, furthermore the sport fishing is open to anyone and is not limited entry meaning sport fishermen can participate in the commercial fishing and keep the sport for personal use if they so choose. Furthermore the commercial sport harvest is primarily sold to local residents who likely do not have the funds to participate in the sport and purchase fishing gear allowing more residents to share in the resource and not just wealthy boat owners.

P242

I support this proposal if P240 fails to pass. Conservation burden should be split fairly between user groups.

P 247

I oppose this proposal as this would allow those with capital to dominate the fishing. The PWS sport fishing is unique because anyone with a boat can participate. By creating a minimum legal amount of pots those with large boats who can effectively fish those pots and who can afford gear for those pots will have a distinct advantage over those who cannot safely fish that many pots or who lack the capital to purchase that many pots.

P 250 I oppose this proposal, weather in March is typically much worse and more dangerous than in April, this would unfairly advantage larger vessels and concentrate smaller vessels in small protected areas.

P 252 I strongly support this proposal, allowing fishermen to fish as a coop has no downside and would allow smaller less efficient vessels a better chance at delivering higher quality sport to market.

P 283. I strongly support this proposal. ADFG should have more tools to better manage our fisheries.

—  
**Patrick McCormick**

F/V Sportsman, Chugach View Outfitters

Anchorage, Alaska





Submitted By  
Patrick P. Kus  
Submitted On  
2/10/2022 8:40:20 PM  
Affiliation

Phone  
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Address  
P.O. Box 2843  
Kodiak, Alaska 99615

Comment from Patrick P. Kus

Kodiak

Re: Proposal 271

I am the proposer of proposal 271, and I would like to add some comments for you to consider in your discussions. I made this proposal to reduce the legal escape web size in the Area J Barbed Fishery in order to increase the efficiency of harvest, and reduce handling and mortality of undersize Barbed.

First, I would like to note that there is inconsistency across the regulatory areas. There are 3 areas where the legal size for Barbed crab is 5.50": areas A and D (Southeast and Yakutat, respectively) and the Kodiak, Chignik, South Peninsula and Eastern Aleutian districts of area J. For areas A and D, the minimum escape mesh size is 7.00", and for those districts of area J it is 7.25". Why should the minimum escape mesh size be larger for Area J?

I have fished in the Kodiak Barbed Fishery for many years, since the early 1970s, and I also own and operate a business that buys and reuses crab pots here in Kodiak. In my experience the 7.25" escape mesh size is too large to allow for efficient harvest of Barbed. Too many legal-size crab escape through it (I would say about 20-30%). This is why almost all participants in the fishery use the escape ring option; no one orders pots with the escape web panel option. The escape web option is inherently more efficient as it provides more escape surface area, and a higher percentage of undersize crab in the pot are able to escape, especially on longer soaks. In comparison, using escape rings leads to increased handling and mortality of undersize crab, and also decreases efficiency since crew have to spend more time sorting and returning undersize crab to the ocean.

So, what should the escape mesh size be? I would suggest that 6.75" would be the ideal size, which would still allow undersize crab to escape, but lower the escape rate of legal crab to an acceptable level. Also, I would note that the web does stretch to some extent when it is webbed in to the pots. I believe that this would result in more participants using escape web instead of the rings, which would result in decreased handling and mortality of undersize crab, and would increase harvest efficiency in the fishery. The 7.25" escape web size is just too large, and should be changed.

Thank you for your consideration.



Submitted By  
Patrick P. Kus  
Submitted On  
2/10/2022 8:36:23 PM  
Affiliation

Phone  
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[ppkus@acsa.alaska.net](mailto:ppkus@acsa.alaska.net)  
Address  
P.O. Box 2843  
Kodiak, Alaska 99615

Comment from Patrick P. Kus

Kodiak

Re: Proposal 273

I am the proposer of proposal 273, and I would like to add some comments for the Board to consider in the deliberations. I made this proposal to allow for the opening of pots in the area Kodiak ground king crab fishery in order to make it more economically viable.

As it currently stands, the area Kodiak ground king crab fishery is not really economically viable. Requiring the use of single-set pots in such a deepwater fishery makes it difficult to prosecute efficiently, and there is a much higher likelihood of gear loss. This is why pot openings are permitted in the BSAI, and indeed there is a profitable ground king crab fishery in those areas. So, why shouldn't pot openings be permitted for area Kodiak if there is enough quota to allow for it?

Further, if there is a concern that the quota in area Kodiak is just not large enough to allow for significant effort, there are mitigation provisions that could be used to limit participation and prevent overfishing. The most effective way would be to make the fishery super-exclusive, which would prevent the larger boats that fish in the BSAI from moving into area Kodiak. The advantages of such a provision would be two-fold: there would be less effort from larger-scale operations, thus slowing the fishery down, and a higher percentage of the participants would be local boats, which is appropriate in my opinion given the smaller quotas in area Kodiak. Also, the number of participants could be restricted by limiting the number of permits. And finally, a quota-based pot limit could be instituted. These are all established, effective tools that could be used to limit the fishery and allow the department to effectively manage it.

While the quota for ground king crab in area Kodiak is currently very small in comparison to the BSAI, I believe the Board should allow for the fishery to grow if the quota does increase in the future. King crab is a valuable commodity, and the fishery has the potential to bring local economic benefit, providing local jobs and tax revenue. I would argue that using pot openings is really the only way to make this fishery practically viable. The Board could also consider a sunset clause in any act on they take if there is concern about any long-term impacts.

Thank you for your consideration.



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February 15, 2022

Dear Board of Fish,

Don't even think about it!!!

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 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.

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.

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.

Paul Carlson

Kenai  
99611



Submitted By  
Pau Homberg  
Submitted On  
3/10/2022 12:23:26 PM  
Aff at on

Phone  
907-232-4252  
Ema  
[seakngpau@gmail.com](mailto:seakngpau@gmail.com)  
Address  
2855 N. Lazy Mt. Dr.  
Palmer, Alaska 99645

To the Board of Fisheries,

I have commercial fished in Area M a my life. I was born and raised in this area. I do not believe that the Board of Fisheries should have any meeting concerning Area M and Area L out of cycle. Any previous shut down of Area M or Kodiak has never benefited the Chignik fishery. There is historical data to back that up. ADF&G are experts in these fisheries and the board should take into account the respected opinion and recommendations. We see no reason for the BOF to address both areas in and out of cycle meeting.

Sincerely,  
Pau Homberg

January 3, 2022

Paul Johnson  
776 Chignik Road  
Chignik, Alaska 99564

Alaska Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Subject: BOF Proposal 282

Dear Alaska Board of Fisheries,

I support Proposal 282, which asks that the Dolgoi Area and the Shumagin Islands salmon fisheries be curtailed from June 15 to July 31 when Chignik is not meeting escapement. The proposal is not about allocation, only resource conservation.

The Chignik early-sockeye run has not achieved minimum escapement for the last four years and yet, Area M fishermen have been permitted to harvest east-bound sockeye salmon through July without any requirement to share the burden of conservation. It is not right that the Shumagins and Dolgoi areas are permitted to operate without regard to the escapement status of Chignik sockeye salmon when it is known from WASSIP data that Chignik sockeye salmon are significantly harvested in the fisheries there from mid June through July.

In fairness, a pull-back in fishing time in the Shumagins and Dolgoi areas is reasonable when the mid-point of the Chignik early-run sockeye goal is not going to be met.

Most sincerely,

***Paul Johnson***

Area L commercial salmon fisherman







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February 26, 2022

Dear Board of Fish,

I'm an Alaskan resident who resides in Anchorage and enjoys the fisheries available to residents from both a subsistence and recreational aspect. I do not target king salmon personally for subsistence or recreation due to the low returns. In regards to this proposition, it's hard to see how the Board can accept a proposition to reduce the king salmon escapement goals (which are already not being met) related to increased opportunity for commercial harvest of sockeye salmon. The currently approved escapement goals are supposedly based on the best available science, and the OEG is meant to improve the population. The proposition creates a contradiction between the idea that the established goals are based on the best available science above all else and the proposition to accept lower king salmon escapements goals, or meet minimum SEG, for commercial opportunity of sockeye salmon. Accepting the proposal implies there was incompetence or error in establishing the current escapement goals and it needs to be directly addressed as to when and to what nature the errors in evaluation of the best available science at the time resulted in the escapement of the current goals. Those who evaluated or misevaluated the data to establish the current goals need to identify their errors that justify further reduction in the escapement goals.

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.

In closing,

I appreciate the Boards attention to this issue. However, if the Board fails to acknowledge the king salmon's decline, and fails to vote down this measure in favor of commercial sockeye opportunity, there is little left to appreciate.

Paul Pribyl

Anchorage  
99516



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February 17, 2022

Dear Board of Fish,

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.

Paul Winn

Anchorage  
99518



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March 09, 2022

Dear Board of Fish,

We want salmon fishing on the Kenai Peninsula to be available for our grandchildren and their children and grandchildren.

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.

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.

Peggy Skaggs

Westcliffe  
81252



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February 27, 2022

Dear Board of Fish,

I live in Wasilla Alaska and have been fishing the kenai since the early 80s and have witnessed the up and down fishery for a long time, currently we're in a serious low abundance time period and believe it will continue for some time, the lack of 5 and 6 ocean fish should be at the highest of conservation, why would we even consider killing one, first and foremost conservation should be at the very top. Very sad day when there gone. Please do the right thing, build the stock back up, we're tired of not making escapement goals or hovering at the bottom of the OEG.

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.

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.

Pete Imhof

Chugiak  
99567

Submitted By  
Peter Hamre  
Submitted On  
3/11/2022 1:12:47 PM  
Aff at on



PC419  
1 of 1

I'd like to voice my opposition to Proposal 282, affecting changes to the salmon fishing schedule in the South Alaska Peninsula. There is a plethora of reasons that Proposal 282 is a bad idea.

1.) Back Lake is undergoing rapid habitat degradation for salmon rearing, due to natural causes. Chignik Regional Aquaculture Association commissioned a report in 2006 that accurately predicted the eventual dwindling of salmon returns to that system, as a result from the lake filling in. That report also noted that during the 1975/1976 ocean regime shift, when other Gulf of Alaska sockeye systems experienced a two to three-fold increase in production, Back Lake only increased about 30%, because of the marginal nature of its habitat, and its shallow water. Now, as sockeye systems across the Gulf are declining, possibly due to climate change, the marginal habitat of Back Lake becomes more apparent. Chignik Regional Aquaculture Association even went so far as to consult with engineering firm CH2M Hill to try to address the problem, but they concluded that redirecting the water flow to the original channel would be prohibitively expensive. Chignik stakeholders have known about this problem for many years, and choose now to redirect the blame towards Area M fishermen.

2.) The WASSIP study concluded that areas of Area M that currently have scheduled fishing time intercept an extremely small amount of Chignik-bound sockeyes, usually in the low single digits. Mind you, this is back in 2006-2008, when Chignik was having strong runs - the intercept rate is almost certainly significantly lower now. The proposal would cut Area M's time less than half, for catching an imperceptible amount of Chignik fish.

3.) ADF&G is reevaluating the SEG for Chignik this coming year - this is an off-cycle proposal that is using data that will not be relevant next year. Any changes to the fishing schedule should be done in the normal board cycle, with the most current data available.

4.) The economic impact to the communities of King Cove, Sand Point, Cord Bay, and False Pass would be staggering. With the decline of Gulf of Alaska cod, fishermen are extremely reliant on salmon for the livelihood. As of 2020, 3,420 people live in the East Aleutians Borough, most of whom are Indigenous; that's more than 30 times the population of Chignik, and as such, the economic impacts of this proposal must be considered.





3015 112<sup>th</sup> AVE. NE SUITE 150 BELLEVUE, WA 98004-8001 206.728.6000

March 11, 2022

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

**RE: Proposal 282: 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan and 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.**

Dear Chairmen Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment on Proposal 282 put forth pursuant to the Alaska Board of Fisheries. **Peter Pan Seafood Co, LLC strongly opposes Proposal 282.**

Peter Pan Seafood is a long-standing processor of Alaska's seafood. We have a processing facility in King Cove as well as a fisherman support facility at Sand Point. We have been processing in the South Alaska Peninsula since 1911. Our operations are intricately tied to and supported by the communities in which we reside. The health of these communities and our industry is dependent on sound management that protects the health of Alaska's fishery resource.

Regarding Proposal 282, we believe that the Department currently has all of the tools it needs to manage the mixed-stock salmon fisheries potentially impacted by 282, and that the Department has utilized those regulatory tools professionally for many decades, as it did in 2018 and 2020 in attempt to protect Chignik runs. We ask the Board of Fish to acknowledge the Department's science-based management practices by taking no action regarding Proposal 282 at this time; and fully consider these fisheries in 2023, when Area M is scheduled as part of the regular Board cycle.

Area M mixed-stock fisheries have been among the most highly analyzed fisheries in Alaska for decades, and the conclusion of each new study is the same:

- Area M mixed-stock salmon fisheries do not create any adverse impact on those stocks
- There is no correlation between Black Lake escapement and the Shumagin Island fisheries.

Proposal 282 has remarkable economic impacts directly effecting the harvesting and processing sectors, as well as communities. Over 500 captains and crew are participating in the Area M mixed-stock commercial salmon fishery. All engaged in fishing are supporting the grocery stores, vessel support services, and restaurants in the communities. This activity is synonymous for all communities that benefit from Area M harvest. To reduce Area M fishing time that has already been approved through a public and transparent process would be detrimental to the communities and livelihoods of the individuals that rely on these fisheries.

Proposal 282 is an out-of-cycle allocative action. Please recognize the Department's professional, science based in-season management abilities and defer any action until you can fully consider these habitat and management issues, already scheduled for the 2023 cycle.

Sincerely,

**Colby Boulton**  
Plant Manager  
Peter Pan Seafood Co, LLC



Submitted By  
Peter Schonberg  
Submitted On  
3/11/2022 8:34:08 PM  
Affiliation  
Area Managers

Dear Board of Fish Members:

I strongly object to proposal 282. I don't understand why this issue is being considered out of cycle as an ACR. The ADFG sockeye salmon forecast for 2022 shows harvestable surpluses for both the early and late run. The lack of a conservation concern takes away the urgency that would make this proposal valid as an ACR. Beyond this basic issue, the proposal does not address how reducing fishing time by half in two of the main area M fishing areas will solve the problem of weak Chignik sockeye runs. In fact, the best available science from the ADFG report shows that only a small number of Chignik sockeye are harvested in the Shumagin during June and July. A somewhat larger number have been taken in the past out of the Dog area, but harvest caps put in place by the Board of Fish in the last few years are ready to tightly limit the catch of Chignik reds. Any way you work the math, if one believes the science, the total number of Chignik reds taken in area M in a year are now ten thousands. Proposal 282 asks this Board to greatly damage the fishers and communities of area M to get half of these now ten thousands of fish to Chignik. I don't know the reasons for recent weak returns to Chignik, but implementing this proposal will not solve the problem and will cause great harm.

Thanks

Peter Schonberg



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March 08, 2022

Dear Board of Fish,

I have lived in Alaska for 45 years. I worked for ADF&G and then USFWS. I began fishing in the Kenai River in 1978 when we had large numbers of king salmon. It is very disturbing to see how king numbers have declined. Proposal 283 is a horrendous idea. We need to do everything we can to conserve and protect king runs on the Kenai. Commercial fishers should not be fishing for then at all, and I would not be opposed to completely closing sport fishing for kings (including catch and release) until king numbers have recovered.

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.

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.

Philip Brna

Anchorage  
99507





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February 16, 2022

Dear Board of Fish,

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.

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.

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.

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Quyen Kay

Anchorage  
99516

To: Chairwoman Marit Carlson-Vandort and Members of the Board,

I support Proposal 282. I bought a permit in 1991 and am now left with basically zero returns in a community falling apart from 4 years of failed runs on top of years of gradually diminished returns. The fishery in the lagoon has changed so much since then. It used to support most of the 90 or so boats in the lagoon sometimes but then in the late 90's management stopped opening all the area in the upper lagoon, and would only open it after the first 24 hours. This was a loss of traditional fishing area. Then the fishing openings were managed to achieve a smoother harvest for ease of processing as per governor direction and processor request.

In the late 80's the South Unimak June fishery area was expanded, adding area able to be fished along the mainland. In 2001, the GHL in the June Unimak/Shumagin fishery that kept the traditional harvest ratio of 5.8% South Unimak/1.5% Shumagins from shifting was removed and restrictive windows were implemented.

Historically the GHL was designed and implemented after the Board of Fish closed the June sockeye fishery in the South Peninsula in 1974, providing only small sockeye cap so that local chum could be pursued. This was because Bristol Bay was forecasted to have only a 200k sockeye harvest. It restrained the expansion of the fishery for almost 3 decades. In 2004 the window times were liberalized to be longer.

In 2004 it expanded the south Unimak fishable area farther east. All this undoubtedly expanded the South Peninsula opportunity to harvest Chignik sockeye. It was a gradual process spread over many decades. Since expanding the fishery into the Dolgoi's the WASSIP study identified large catches of Chignik sockeye, both first and second run.

Back in Chignik in 2001, a heavy rain washed out part of the weir where escapement is enumerated. Large amounts of sockeye over escaped into the river. I have yet to document why the fishery was not open for harvest since escapement was met. Because of this event, the department decided to manage for the lower bounds of escapement goals in 2002. This practice went on until it was discontinued in 2014 or 2015. The practice of managing for lower escapement, while it did usually meet the lower escapement goals, shifted the number of salmon escaped in June (around the historical peak) lower by nearly 130k because escapement intervals were also adjusted later into July. This makes little sense as a natural defense strategy of salmon is to travel in large groups so predators encountered, only take a small percent of the whole. In the 80's the first run was managed so that 400k sockeye escaped past the weir by June 30<sup>th</sup>. This ensured the first run was met as few second run sockeye enter the system in June. 200k more sockeye were to escape by July 31<sup>st</sup>. These are mostly second run. Then 50k in August. September was bonus/extra.

As salmon returning from first run escapements that were displaced temporally and lowered in escapement overall, in Chignik, and while having a more challenging interception gauntlet to pass through in the South Peninsula, the salmon became sparser in the lagoon. The big build-ups occurred less and less in the lagoon as the 2000's went on.





To make my boat and permit payments, it became more effective to search for sockeye out on the capes. I purchased the longer gear and fished the Lagoon less and less.

All this is to say that the sockeye runs in Chignik (and Chinook, too) have everything going against them. The most the fish and game has done is to manage for the yield of zooplankton in Chignik Lake. They don't have other tools really and are bound by regulation, and the commissioners who have emergency authority would prefer new tools/regulations come through the Board process. One of the only tools that the Department of Fish and Game does fadjust is escapements. They even lowered the Chinook escapements during the 2001-2002 BOF meeting from 1,450-2,700 spawners to 1,300-2,700 spawners. This action probably softened the appearance of impact generated by the extra days we would fish from smoothing out the harvest and lowered escapements. More days in a terminus fishery doesn't make for more fish like it does in an interception fishery.

Interestingly, not once over the years have I ever heard the Department suggest we could be experiencing even the slightest impact from interception. It would probably be considered an allocative thing to do so. But the impact in the South Pen can be seen when, over time, the Shumagin catches increase and Unimak catches decrease.

I think it should be more closely scrutinized that while the Bristol Bay stocks are mostly passed on to the North side by July 5th, there are still plentiful sockeye catches in the Shumagins. It was documented in 1990 that the seine fleet was so effective in the Shumagins that they were stopping the salmon from getting to the mainland. I believe this would have to apply to sockeye, too. Also in 1990, the fish and game who were much more protective of salmon stocks, thought the fishermen in the Shumagins had found a location to harvest Chignik sockeye. I grew up as a deck hand on my dad's boat backthen and believed that was just how the fish and game was. The department's mentality has shifted since then to one of basically procedural policy following.

All this is to say, there are all these things that can be reversed that will benefit Chignik salmon. Bristol Bay salmon not caught in the Shumagins still have to pass through Unimak. If they (sockeye) don't and are going East instead, then it's not a fishery on Bristol Bay stocks any longer.

I am aware some are going to suggest that there is a problem in Black Lake but any changes are stabilized since before 2012 as documented by the Army Corp of Engineers. And salmon if left to their devices, are resilient and adaptive. Unless and until it is documented as an environmental failure, every option used in the past anywhere Chignik salmon migrate should be employed. The excuse that there are too few salmon present anywhere to have a meaningful effect from preventing fishing mortality is false at best. Yes, it will take time to rebuild the runs but it took time to get here. Chignik salmon, the communities of Chignik, the fishermen and women invested here, all deserve (yes, deserve) to see the resource protected.

Please don't delay making every reasonable effort including passing Proposal 282. More solutions should be considered. This degradation of the run has been allowed for too long. Thank you. I will include supporting evidence and graphs post script.

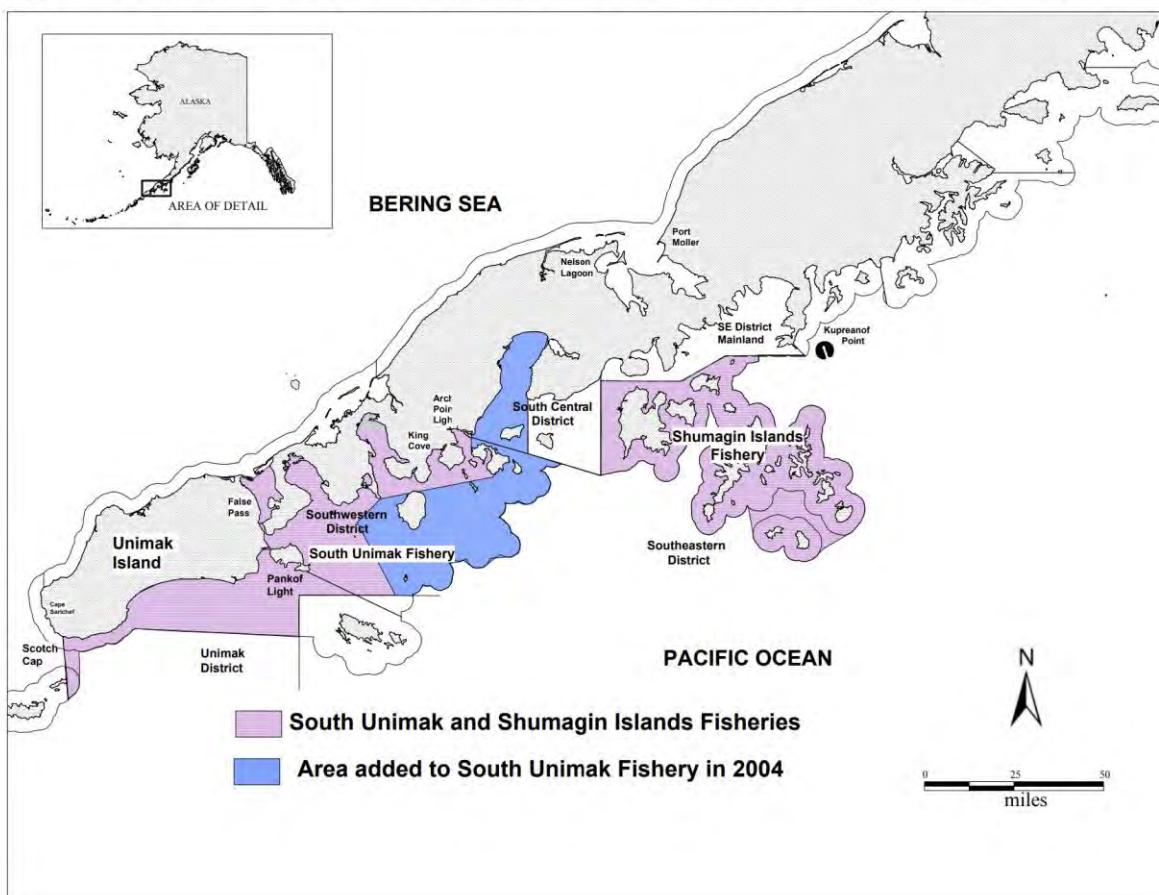
Sincerely,

Raechel Allen



The area able to be fished since 2004 was expanded greatly towards SEDM and Chignik.

**Appendix B3.**—Map of the South Unimak and Shumagin Islands June fisheries with areas open to fishing defined.



2004 South Peninsula Annual Management Report, p.99

### III. Problems with Current Plan.

In 2001, the board removed a longstanding sockeye salmon guideline harvest level (GHL) for the June fishery which equaled 8.3 percent of the total projected harvest of Bristol Bay sockeye each year; 6.5 percent was applied to the South Unimak fishery and 1.5 percent to the Shumagin Islands. The board also eliminated a chum cap that had been imposed on the June fishery, at various levels, since 1986. In place of the sockeye GHL and chum cap, the board established nine 16-hour open fishing periods (144 total hours), between June 10 and June 30 along with some other incidental prescriptions. The effect of this new management plan was a substantial reduction in sockeye salmon catches but not much reduction in chum salmon catches; the exact opposite of the long-standing June fishery management objectives of harvesting the historical percentage of sockeye while minimizing chum harvest.

Figure 2 Alaska Board of Fisheries, Findings on February 2004 Amendments... p.2, #2004-229-FB



### **A. Sockeye Salmon in the June Fishery.**

Several small tagging studies have taken place at South Unimak and in the Shumagins, from 1925 through the 1960s, but the largest, most recent, and most comprehensive was a study conducted by the department and contractors in both locations during the 1987 season.

For that study, 5,442 sockeye salmon were tagged at South Unimak and 1,545 were tagged in the Shumagin Islands during June and very early July. Almost all tag recoveries occurred in the Bristol Bay, North Alaska Peninsula, South Alaska Peninsula, and Chignik areas. There were high rates of tag return reporting and good assessments of terminal runs (catch and escapement) for stocks where tags were recovered. Based upon reasonable estimates and assumptions of tag loss, fish mortality, and tag reporting, the study estimated the stock composition of sockeye salmon harvested in the two fishing areas: 84 percent of the sockeye salmon harvested at South Unimak sockeye were bound for various systems in Bristol Bay, while 54 percent of those caught in the Shumagin Islands were destined for Bristol Bay.

*Figure 1 Alaska Board of Fisheries, Findings on February 2004 Amendments... p.2, #2004-229-FB*

The GHL plan that was removed in 2001 was based on historical catch data that protected the various stocks being intercepted. The loss of the GHL has been detrimental to Chignik. Coincidentally, the Black Lake salmon (1:3's) returning from the first year of lowered escapement which will be discussed later (2002) would have returned in 2007, the 2<sup>nd</sup> year of the WASSIP study. The same applies for 2008. This affected the WASSIP data, lowering the % in 2007 and 2008.



## Regulatory History

The South Unimak and Shumagin Islands June management strategy was decided on a year-by-year basis from 1972-1974 due to very low projected Bristol Bay sockeye salmon returns. In 1974, the South Unimak and Shumagin Islands fisheries were closed during June. In 1975, the BOF implemented an allocation plan where the South Unimak and Shumagin Islands June fisheries would be granted an annual guideline harvest level (GHL) based on the predicted Bristol Bay inshore sockeye salmon harvest. Based on historic catch data, 6.8% of the forecasted inshore Bristol Bay harvest was allocated to the South Unimak June fishery and 1.5% was allocated to the Shumagin Islands fishery. To reduce the possibility of overharvesting any segment of the Bristol Bay run, the GHL was apportioned to discrete time periods based on historical catch data. The distribution of the allocation by time period and percent was as follows:

<u>Time Periods</u>	<u>South Unimak</u>	<u>Shumagin Islands</u>
June 1 - 11	5%	9%
12 - 18	29%	28%
19 - 25	51%	41%
<u>26 - 30</u>	<u>15%</u>	<u>22%</u>
Total	100%	100%

If the guideline harvest for an individual time period was not reached, the unharvested portion was lost to the fishery. If the guideline harvest for an individual time period was exceeded, the overharvest was subtracted from the total season allocation.



Historical percentages of sockeye harvests between Unimak and the Shumagins was drastically altered in June. Effort shifted to the Shumagins in 2001 when the GHL was removed, however the effects of removing the GHL were masked by implementing restrictive fishing periods. In 2004, new liberal fishing periods were given virtually equally between the Unimak and the Shumagin June fisheries. The result of this has been a shift from the historic catch ratio that was applied when the GHL was created to a higher percent of the sockeye being caught in the Shumagins and closer to Chignik.

The following graph shows the shift in catch between areas over time and how June catches in the Shumagins have increased over time while they have decreased in the Unimak fishery. The effects of the GHL ending in 2001 and restrictive windows lifting in 2004 can be seen:

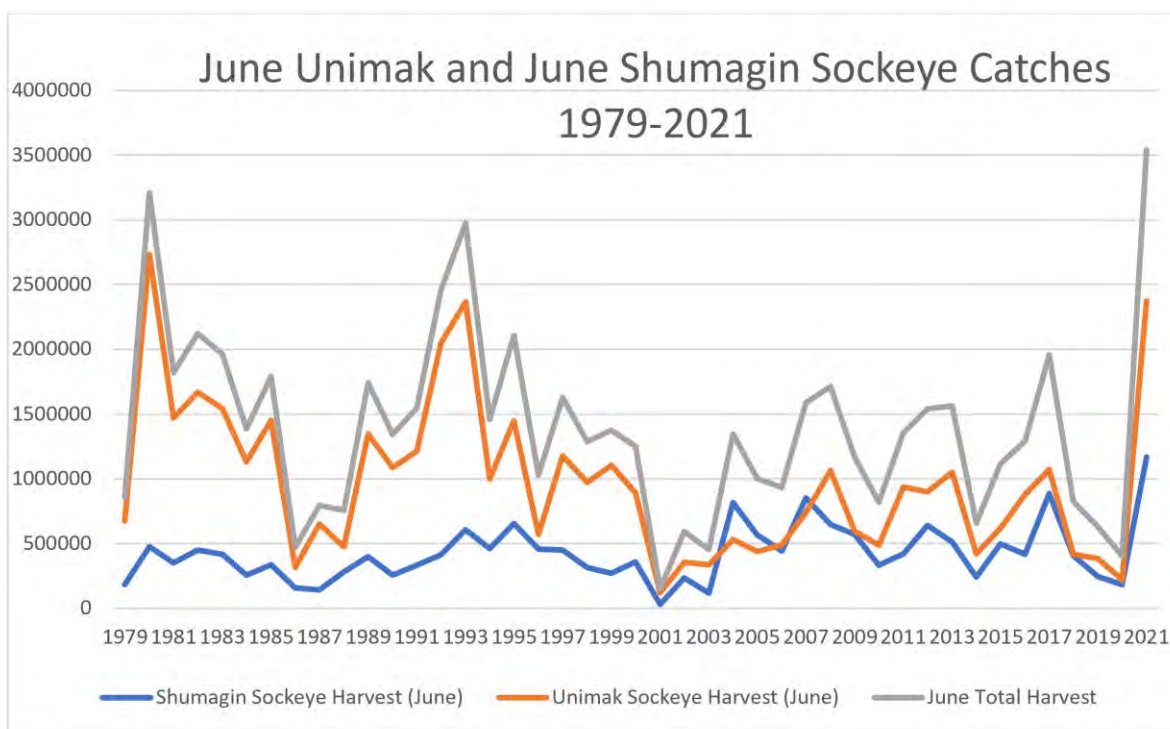
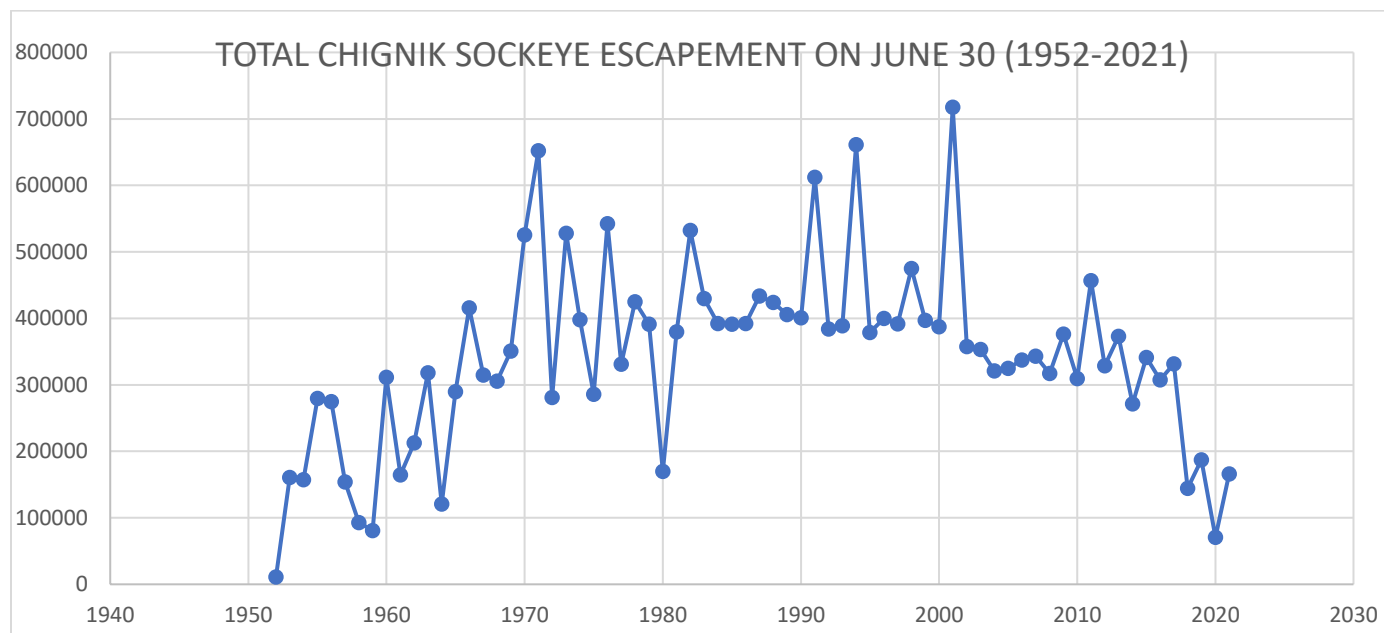


Figure 3 graph made from ADFG data



This graph shows that getting 400k escapement by June 30<sup>th</sup> provided for the healthy runs of the 80's and 90's and that less escapement in June corresponds with the poor fisheries of the 60's and 70's.



Above graph compiled from ADFG data.

The escapement over the years shows how management affects the returning salmon. Pre 80's were focused on rebuilding runs. Before that the effects of highseas interception from Korean and Japanese fleets were having effect.

The chart above also shows that less salmon after 2004 were getting into the river by June 30<sup>th</sup> when managing for low end escapement was practiced. Also, the escapement tables were changed so that the escapement was spread more evenly for the 1<sup>st</sup> run. Spreading evenly works well for buttering toast; not so much for salmon who prefer a peak timeframe, different for each distinct run.

The point I am trying to explain is that first run salmon are being collected through July now rather than 400k escapement by June 30<sup>th</sup> as was in the 80's. While some of those were second run, the vast majority were first run, thus assuring a solid escapement during the salmon's preferred timeframe.

With the first run being necessary to escapement in July now, it is important to protect these salmon as they pass through near interception fisheries even more.



1990  
ALASKA PENINSULA-ALEUTIAN ISLANDS  
GENERAL SALMON MANAGEMENT PLAN

SOUTH PENINSULA JULY - AUGUST

The 1990 pink salmon projected catch is 8 million fish. This is approximately 900,000 over the 1989 harvest of 7.1 million fish, and 1.2 million over the parent year (1988) harvest of 6.8 million. The 1980-89 average South Peninsula post June pink salmon harvest is 5,246,000.

The post June chum salmon harvest is projected to be approximately 700,000 fish which is over the 1989 harvest of 538,000 but well under the 1980-89 average of 1,060,000.

During 1980 a much larger than normal number of purse seiners caught record numbers of pink salmon in the Shumagin Islands. It became apparent that the purse seine fleet was effectively preventing the salmon from reaching their terminal locations and the runs were only mediocre east of Volcano Bay. Due to the fact that there is often considerable variation in the strength of runs going to different geographical locations, the amount of purse seine gear in the Shumagins will definitely be a factor in determining the amount of fishing time allowed in the Shumagins as compared to mainland terminal harvest areas.

It is speculated that large numbers of Chignik sockeye may be intercepted during July in portions of the Shumagin Islands Section. These locations do not have a documented history of substantial fishing effort until recently. The locations in question are:

- (1) The west side of Unga Island located between Bay Point and Archedin Point.
- (2) The portion of the Shumagin Islands Section located south of 55° N. lat. (which includes Mountain Point on Nagai Island).



in Chignik Lake into Black Lake and Chignik Lake origins. There appears to be a rough correlation between Chignik spawner abundance and Chignik yearling progeny index. Indices for the last three year classes (1968-1970) tend to be low.

Growth of Juvenile Sockeye and Interaction with Potentially  
Competing Resident Species

Parr (1972) presented a detailed analysis of abundance, growth and food habit studies of juvenile sockeye, threespine and ninespine sticklebacks, and pond smelt in Chignik and Black Lakes based on extensive analyses of samples of fish and plankton collected in 1968, 1969, and 1970. Only a brief discussion of the objectives and results of this M.S. thesis study will be presented here since copies of the thesis were forwarded previously. Additional data collected in 1970 and 1971 will be presented in tabular form.

By the 1960's the runs of sockeye salmon to the Chignik system had declined considerably since 1940. Fisheries Research Institute studies of the factors causing the decline have been reported previously by Narver (1966), Dahlberg (1968) and Burgner et al. (1972). The primary conclusions of these studies were that the carrying capacity of the nursery areas of the two lakes is the primary limiting factor in sockeye salmon production and that previous allocations of parent spawning escapements were responsible for underutilization of the Black Lake nursery areas and overutilization of the Chignik Lake nursery area. This was believed to have resulted in an increase in the abundance of resident species in Black Lake which could compete with the juvenile sockeye for food and space.

Narver (1966) and Dahlberg (1968) estimated the optimum spawning escapements to Black and Chignik Lakes which now serve as the target escapements under the present State of Alaska fishery management policy. The early segment of the run, going to Black Lake, is now regulated for higher spawning escapement, and the later segment to Chignik Lake, for lower escapement. The Institute study reported by Parr (1972) was undertaken to gain direct evidence as to whether the present policy is having the desired effect, that is, (1) to increase the abundance of juvenile sockeye in Black Lake, (2) to suppress the competitor species, and (3) rebuild the runs to pre-1940 levels. Parr's study focused on the following objectives: (1) to compare the food, abundance and growth rate of juvenile sockeye salmon, threespine and ninespine stickleback, and pond smelt which are potential competitors for food in the Chignik Lakes, (2) to determine what relationships (if any) exist between abundance, growth rate, and food habits, (3) to determine whether competition for food exists between and within the fish species, and (4) to assess the effects of competition for food on the growth rate of the sockeye salmon in the limnetic areas of the two lakes.

The objectives of the study were based on the hypothesis that an observable effect of competition should exist if competition is intense. If interspecific competition exists, a negative relationship may occur between abundance





## 2002 SOCKEYE SALMON MANAGEMENT

### *Chignik Lagoon Regulatory Markers*

In 1996, the Governor and local processors requested changes in management strategies to help enhance product quality. In response, Chignik ADF&G management staff modified the management strategy to help alleviate some of the quality problems in the Chignik Lagoon and provide for an even flow of escapement. During most of 1996 - 2001, the department implemented the following schedule for the Chignik Bay District openings: 1) initial openings were only allowed north of a line drawn from Humes Point to the Chignik Island markers and 2) after 24 hours the fishery was opened to the Mensis Point markers, which is located in the mouth of the Chignik River. This management action seems to have improved quality because processors have indicated an overall increase in the quality of delivered fish. Quality likely improved because salmon holding between Humes and Mensis Points were given an extra day to migrate upriver and escape the fishery. As warranted during the 2002 salmon season, opening and closing the waters between the Humes and Mensis Points markers will continue to be utilized as a management tool.

### *The June and Early July Fishery*

ADF&G intends to give the fleet advance notice prior to any impending fishery by news releases. By regulation, the first commercial fishing period can occur on June 1. However, since 1982, the first fishery usually occurs after June 11. Prior to the first commercial salmon fishing period, the following requirements must be met:

- 1) a minimum escapement of 40,000 sockeye salmon through the weir by June 12, and
- 2) a strong buildup of salmon in Chignik Lagoon must be present as indicated by the ADF&G test fishing program.

Subsequent openings will be determined from several factors including commercial catches, test fishing results, and meeting established interim escapement goals (Table 1). During June, commercial salmon fishing will be allowed only in the Chignik Bay, Central, and Eastern Districts. Commercial salmon fishing, as described by the Chignik Area Salmon Management



March 03, 2022

Dear Board of Fish,

Our family has been fishing the Kenai river for over 30 years. The king return has dwindled this whole period. Commercial fishing must cease or be heavily restricted. This includes the cook inlet commercial fishing the commercial fishing in river, the river guides. Lowering the escapement is such a joke. Lower the escapement and yay you meet your goal with the commercial fishing all season. Sport fishers are allowed to keep 2 kings out of the Kenai river. Professional guides can have 4 to 8 new clients each take 0 to 8 king out of the river each day after the commercial fishers take their hundreds if not thousand of returning kings. No river can handle this pressure. I you want all the craziness to continue you have to enhance this river.

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.

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.

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.

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.

randy bowen

kenai  
78230





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February 15, 2022

Dear Board of Fish,

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.

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 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?

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.

RAY RHASH

Tavernier  
33070



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February 15, 2022

Dear Board of Fish,

We live on the Kenai and hope that someday we will have strengthened the Kenai King run so our grandkids can fish the Kenai river. This will not happen if you passing 283. Please do not be fickle, give into pressure and reduce the numbers until escapement numbers do actually increase.

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.

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.

Rebecca Branson

Soldotna  
99669



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March 08, 2022

Dear Board of Fish,

Please vote no on Proposal 283, and maintain the Late Run King Salmon Management Plan in its current form.

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.

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.

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.

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.

Rebecca O'Hara

Anchorage  
99516



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February 15, 2022

Dear Board of Fish,

As a Soldotna resident and Kenai River angler, I would be very upset to see management going the wrong direction in protecting Alaskan king salmon. Please say no to proposal 283.

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.

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.

Reed Morrison-Plachta

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

The current management plan was put into place for a reason, King Salmon Conservation. Stick with the current plan.

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.

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.

Reuben Hanke

Soldotna  
99999



Submitted By  
Reuben Payne  
Submitted On  
2/15/2022 11:55:53 AM  
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PC431  
1 of 1

Please take a few minutes to think about the fishing in 1986 compared to today. If you weren't here in '86 think about '96. Not here...OK think about how fishing on the Kenai Peninsula or anywhere statewide was during the early 2000s. Ok, lets look at 10 years ago. The time to raise expectations is now...not over escapement goals. If you don't care about sport fishermen, fine... if you don't care about set netters, that's ok as so. If you could care less about dipnetters, drifters, or tourist...no problem.....please just care about the fish...they don't need you to lower the goal...they need you to raise the goal. I've lived for 30 years here and hate to see my business struggle with no kings....but I also have three sons that live here on the river and I hate to even think that they might never catch another king. Do the right thing.....



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March 01, 2022

Dear Board of Fish,

No on 283. Save our salmon heritage

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.

Rex Maurer

Hobart  
98025



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February 20, 2022

Dear Board of Fish,

Please protect our king salmon. Accidental catch is still catch and taking them out of our rivers. Look out for all people of Alaska and the USA. Not just the commercial fishermen.

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.

Rhonda Schwartz

Brainerd  
56401



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March 07, 2022

Dear Board of Fish,

Live in North Carolina and have enjoyed coming to Alaska to peruse salmon and halibut. I have noticed over the 20 years a decline in king salmon fishing. It would be disappointing to allow more salmon to be harvested.

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.

Rich Brannin

Wilmington  
28409



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February 15, 2022

Dear Board of Fish,

I have been spending thousands of dollars every year in Alaska to enjoy your fishing. Last year King Salmon closed the day I arrived. This proposition is a death sentence to your tourism and your citizens that depend on the income. There are other destinations in the world that welcome fishermen and responsibly manage their resources. Vote NO.

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.

Rich Calcut  
35803





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February 18, 2022

Dear Board of Fish,

I was born in Alaska and lived along the Kenai River for many years. I used to be able to catch kings from my dock....boy have things changed. I haven't fished for kings from my dock or my boat since 2008.

We need to keep paired restrictions in place. It makes no sense to allow the nets in the water when we are not meeting our escapement goals.

Passing Proposal 283 prioritizes a small group of commercial fishers 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 towards lightening 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.

RICHARD BUCY

kenai  
99611



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February 15, 2022

Dear Board of Fish,

I am a retired Alaskan. I have watched through the years as returns on king salmon have gotten lower and lower along with the size of these beautiful fish get smaller.

Reducing the escapement goal because it is not being met is lunacy. It's like Congress raising the debt ceiling because they overspend year on year. Doing so makes this goal meaningless. You might as well eliminate it and have a free for all and let all user groups take at will.

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.

Richard Davis

Soldotna  
99669



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February 18, 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.

Richard Erkeneff

Soldotna  
99669



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February 24, 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 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.

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.

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.

Richard Jameson

Anchorage  
99516



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March 05, 2022

Dear Board of Fish,

We live on the Kenai River and fish on the lower river. Since moving here about 20 years ago the king salmon run has declined to a point we need to better manage this problem and focus on the future king runs. The escapement goal is too low now and we see no improvement.

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.

Richard Larson

Kenai  
99611





Submitted By  
Richard McGahan  
Submitted On  
2/22/2022 9:38:46 AM  
Affiliation  
Cook Inlet Set Netter

Phone  
907 252 1134  
Email  
[bouderponton@alaska.net](mailto:bouderponton@alaska.net)  
Address  
54025 Kena Spur Hwy  
Kena, Alaska 99611

IN FAVOR: Proposal 283

I am a 67 year resident of Nikiski. I fished on Samatof Beach my first summer here in 1955, when my Dad drove truck picking up fish for McNeely, Lobbey and McNeely. Since then I have been a drifter also, and am now back fishing the same beach with my wife, daughter, son-in-law, and grandchildren. During all that time we have poor runs and good runs. We are used to having fishing restrictions during poor runs and are in agreement with that. But with the current regulations, we sit on the beach with our nets piled on the sand and watch over a million fish escape into the river. This is where the drifters fish, the sports fishermen fish, and the deep netters by the thousands, deep fish. We fish for sockeyes. The current regulations and "partial restrictions" are punitive, unscientific, unequitable and inappropriate. If the biologists are correct, the future runs will show the lack of foresight due to the consistent over-escapement of the last few years. This proposal gives us a chance to fish when there is a great run like last year. Also, lately the runs have been late. We need the biologists to have some attitude.



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February 22, 2022

Dear Board of Fish,

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.

Richard Miller

Waconia  
55387



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February 15, 2022

Dear Board of Fish,

I live (40+ years) and fish in southwest Florida routinely. The stock of snook, redfish and speckled trout were severely depleted, resulting in catch and release only for the past several years. The stocks have begun to rebound. We fished the Kenai almost every year and have done so since 2005. We refuse to harvest another king salmon due to the low escapement.. Florida stood firm on their position of catch and release only and all users have benefited from the years long closures. I hope you do the same.

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.

Richard Mohaupt

Punta Gorda  
33950



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February 17, 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.

Richard Nachazel  
5515



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February 17, 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.

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Richard Nachazel

Johns Creek  
30005





Submitted By  
Richard Person  
Submitted On  
3/11/2022 2:18:05 PM  
Affiliation  
Commercial Fisheries

I have participated in the PWS commercial Spot shrimp Fisheries since its reopening 2010. In general, I am satisfied with the prosecution of the fishery, but believe there is room for some changes in the management plan.

Currently, the entire burden of conservation is placed on the commercial fishing participants who catch the smallest share, i.e. 40% of the TAH.

In every fishery I am familiar with, the BOF has endeavored to spread the burden of conservation out evenly among all participants. Why should PWS spot shrimp be different?

As written, the PWS spot shrimp management plan causes the Commercial fishery to have not a harvestable surplus of 110,000 lbs, while allowing the sport fishery to continue as normal.

Proposals 240, 242, and 246 seek to rectify this in different ways.

**I would like to support Proposal 240** as the best method for correcting this imbalance. It presents a scaled-down harvest for the commercial fishery in times of low abundance.

**I strongly oppose Proposals 247, 250, and 252.**

The stated goal of these proposals is to "speed up" the fishery, presumably so some fishermen can move on to other fisheries that start in May.

Anger's over fishery benefits both management and markets.

Thank you for your time and consideration.



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March 05, 2022

Dear Board of Fish,

Have been fishing Kenai River and Cook Inlet since 1992. Built summer home in 2007 on Keystone Dr. I typically don't fish kings, but one of my most memorable mornings was when my wife and I along with two others limited out in less than 2 hours fishing with a guide in the Meadows. I released a 20 lb king. Net 53, 52, 35 & 26. My wife hooked up w/i 5-10 min. for the 52. Of course, I had the small one, but could brag that I caught the most. It seems to me there were 1500 kings enter the River that morning. (7/14/2004). Seems everybody around us was hooking up. We don't have days like that anymore.

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.

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.

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.

Richard Poe

Winter Haven  
33884



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February 18, 2022

Dear Board of Fish,

I like to visit AK and fish. We live in NC and have been to Kenai peninsula several times.

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.

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.

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.

Richard Schulz

Grifton  
28530



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March 01, 2022

Dear Board of Fish,

As an Almost 70 year Alaskan I have fished countless rivers and the Kenai is a treasure we need to protect.

Please do not sacrifice the future for an immediate economic gain.

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.

Rick Nerland

Anchorage  
99501



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February 26, 2022

Dear Board of Fish,

Im a retired Sport Fishing deck hand. Its important to protect the Kenai River kings now. I spend almost every day on either the Kenai or Kasilof during the fishing season. Sport fishermen should have an equal voice in fishing regulation.

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.

Rick Rector

Kenai  
99611





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February 16, 2022

Dear Board of Fish,

We have let the commercial fleet kill too many kings for years. It is time to state our ground and say enough is enough. Vote no.

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.

Rick Willis

Anchorage  
99507



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March 09, 2022

Dear Board of Fish,

I have been fishing in Alaska the last 30 years and I have seen the size of the King Salmon species shrink over that time. I have caught several fish in the 70 lbs. range, but that was 15 years ago. The average fish size now is under 30 lbs. and it is heart wrenching. If we continue on this trajectory, the salmon species will be lost to the Kenai forever. What has been done to protect this precious species has fallen short and will not save this species from extinction.

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.

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.

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.

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RJ Forte

Draper  
84020



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February 17, 2022

Dear Board of Fish,

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.

Robert Barton

Kodiak  
99615



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February 25, 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.

Robert Beruve

Anchorage  
Alaska  
99501



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February 16, 2022

Dear Board of Fish,

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.

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.

Robert Brukardt  
Eagle River  
99577





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February 18, 2022

Dear Board of Fish,

I am a sport fisherman and have been fishing in AK since I became a resident in 1999. I remember the king salmon runs to be fabulous and plentiful. My wife and kids and I would look forward to our week long King Salmon fishing and camping trip each year. Some of the best times of our lives. A few years ago, I took my son to a place we often fished (it was catch and release only at this point) and we didn't see or catch anything. He was shocked and asked me what had happened as it was so good back in the day. I do not support giving commercial fishermen more opportunities to catch sockeye salmon as I believe they are mainly responsible for the decline in the once prolific king salmon runs. They have become so efficient at catching fish in the saltwater, that far fewer salmon are making it to the spawning grounds. Please limit the commercial fishing minors we to not further decimate the runs that are at a fraction of what they once were.

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.

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.

Robert Chandler

Chugiak  
99567



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February 15, 2022

Dear Board of Fish,

I have sport fished the Kenai river for almost 50 years. As we all know, there will never be another river like it was in the world, but we can try to salvage what's left.

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 fishery management goals.

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.

Robert Estes

STERLING  
99672



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February 27, 2022

Dear Board of Fish,

SAVE THE KENAI KING AT ALL COST!!!!

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.

robert Hall

Kenai  
99611





March 08, 2022

Dear Board of Fish,

To lower the ESCAPEMENT goal is the WORST idea to come out of the Board of FISHERIES in years. The genetics of the KENAI RIVER KINGS, this strain is already destroyed from over fishing, not just from recreational fishing, dip net fishery, but the unwanted waste of BYCATCH in COOK INLET, the BOARD OF FISHERIES thinks about the COMMERCIAL FISHERIES more than trying to rebuild the fisheries as a WHOLE. VOTE NO on PROP 283,  
SAVE OUR KING SALMON

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?

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.

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.

Robert Lesko

Anchorage  
99502



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February 18, 2022

Dear Board of Fish,

Please vote no on 283. I've been going to Alaska for years fishing. The King fisheries need to be protected in Alaska. The Kenia river King salmon fishery is a skeleton of what it use to be. You've already lost my tourist dollars. I now fish other areas in Alaska for Kings. Please protect the Kenia river King fisheries for recreational fisherman before the crumbs are gone.

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.

Robert Sparre

Fair Oaks  
95628





February 16, 2022

Dear Board of Fish,

I live in Kenai and I am a sport fishing guide on the Kenai River. I have a BA and MS degree in fish and wildlife management.

My livelihood depends on having high quality salmon fishing for my clients. The Kenai River used to be known worldwide for producing huge world record King Salmon. However, all this has changed in the last 10 years when sustainable King Salmon numbers have drastically gone downhill. I voluntarily stopped guiding for King Salmon in 2012 when I realized the mighty Kenai Kings were in serious trouble from overfishing (Sport and Commercial); as well spawning habitat degradation. I continued to guide only for Sockeye and Coho salmon.

During these last 10 years I have witnessed the continual reduction in King Salmon escapement goals and numbers. Sport and commercial Eastside setnet fishing has continued pretty much unabated; with only sporadic closures.

Conservation is the wise use of our natural resources. The Board of Fisheries and Alaska Fish & Game have not used good conservation policies, regulations and rules to protect the ever-dwindling numbers of Kenai Kings. If we are to save the Kenai Kings for future generations, all sport (including catch and release) and commercial fishing targeting Kenai Kings must stop now!

Remember the history of the American Passenger Pigeon. There used to be millions of these great birds; endemic to North America. So many birds, that the skies in the United States would be darkened from the sunlight. Millions were commercially shot and killed east coast markets. There were few, if any, conservation measures instituted. This commercial killing, along with habitat destruction, eventually destroyed every Passenger Pigeon in the United States. The last bird died at the Cincinnati zoo in 1914. They are no more. Extinct now. Never to return to earth.

Without proper drastic conservation measures, I can easily see the same fate coming for the Kenai King Salmon.

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. Alaska Fish and Game has not adequately protected the Kenai Kings with proactive conservation measures. The sport fishing seasons should have begun with a total closure on sport /commercial fishing until adequate escapement numbers were obtained. Instead, F&G always opened the season to fishing and then would implement a few meaningless closures ONLY after they realized the escapement goals would not be met. This is not conservation. This has led to a constant decline in King Salmon numbers and will eventually lead to extinction of the great Kenai River King Salmon gene pool.

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.

ROBERT STANDISH

Kenai  
99611



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February 24, 2022

Dear Board of Fish,

I am a 37 year Alaska resident, living in Eagle River. I spend many days a year fishing the Kenai River for kings, silvers, reds, rainbow trout, and dolly varden. I have witnessed the decline of king salmon stocks throughout south central Alaska over the last 15-20 years. I would like to see recovery of king salmon numbers to something approaching the levels of the 1980's and 1990's so future generations will be able to enjoy the fishing that we had.

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.

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.

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.

Robert Wallick





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March 07, 2022

Dear Board of Fish,

Stop commercial fishing

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.

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Robert Young

Rochester  
98579



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February 26, 2022

Dear Board of Fish,

Keep commercial fisheries away from the Kenai River! Greedy humans are taking too much from the Earth.

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.

Robin Chadwick

Ludlow  
05149





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February 15, 2022

Dear Board of Fish,

I was born and raised in Alaska. Have fished the Kenai for years. Please vote no on proposal 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.

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.

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Rodger Ball  
Anchorage  
99503



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February 17, 2022

Dear Board of Fish,

I come to the Kenai to fish for Reds, it is CRAZY to let commercial fishermen catch 50,000 Reds in a fishing window & only allow 5,000 to enter the river! I refuse to come up on the low run years (such as this year) when comms will be again destroying runs of fish with no regard for in-river escapement. To let them catch more by passing Prop 283 is a crime! NO on 283!

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 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?

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.

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.

Roger Okamoto

Sac  
95828



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February 20, 2022

Dear Board of Fish,

Please do. Or vote to lower Kenai river King salmon escapement numbers. It is critical to aggressively protect this hatchery.

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.

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 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?

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.

Ron Keck

Sterling  
99672



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March 08, 2022

Dear Board of Fish,

I have been in AK my whole life, we need to manage fairly on this issue

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.

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.

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.

Ron Perry

Anchorage  
99501





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February 15, 2022

Dear Board of Fish,

alaska resident since 1972 kenai river property owner since 1979 mile 15 salmon run acres subdivision. I have watched the decline of the king runs for years and the many times the OEG has been lowered over the years to allow the commercial fishery to continue. the plan as written is a fair one for all the user groups and to lower it any further would be very detrimental to the kings, think of the fish and please do not allow this proposal #283 to pass.

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.

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.

ron tomblinson

anchorage  
99507





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February 18, 2022

Dear Board of Fish,

I live in Charlotte NC and have lived in Anchorage in the past for 12 years. My family has a boat in Seward and have enjoyed fishing in Alaska since the early 80's. It is imperative that this bill #283 is NOT passed. Due to the declining numbers of King Salmon and other species of gamefish. We have seen for just one example in the Homer Halibut fishery the declining numbers of Halibut and big Halibut due to the long liners which indiscriminately catch everything on the sea floor. They have overfished their areas in the Homer area and are pushing into the Seward area and doing the same there. When is enough, enough? If this trend continues we will see an end to once an envy of the World Fisheries in Alaska. I am afraid this will affect the King Salmon species with dire consequences, so please look into your soul and vote No on #283.

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.

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.

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.

Ronald Jackson

Charlotte  
28270



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March 01, 2022

Dear Board of Fish,

I have lived in Alaska for 49 years as of December 12, 1972. Fairbanks for several years and most of the time in Anchorage and the last 9 years in Sterling. I remember coming to fish the Kenai River every year since 1974, when snagging salmon was the way to catch them. And dip netting in 1981-1982 from the beach fronts in Kenai. I've watched some piss poor management always leaning to the almighty dollar benefiting the commercial and even out of state fishermen. I would sure like to see some good decisions made by this fish board for the citizens of Alaska whom all use our natural resources of salmon for their kitchen tables and freezers. We need a better way to preserve our natural resource then what has happened in the past. What are you afraid to loose. If it has not worked before, make a better decision. Save our icon King Salmon.

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.

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.

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.

Ronald Kruckenberg

Sterling  
99672



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February 26, 2022

Dear Board of Fish,

I've lived in Ninilchik for over twenty years and all I have seen is the king numbers fall off year after year. It's time to put a stop to it and set more commercial restrictions to protect our kings!

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.

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.

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.

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Ronald Lambert

Ninilchik  
99639



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February 20, 2022

Dear Board of Fish,

Gentlemen, my family and I have fished the Kenai River for 30 years. I have watched the decline of the King run with dismay.

Prioritizing the catch of more Reds by a small number of commercial fishermen does nothing to assist in the recovery of the King run. It will only increase the incidental catch of Kings at a time when every fish counts. The actions the Board took in 2020 were a step in the right direction in the recovery King run. Please vote No on Proposal 283 and continue the effort to restore a great fishery.

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.

Ronald Lee

Anchorage  
99504





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February 24, 2022

Dear Board of Fish,

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.

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.

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RONALD MCKAY

KENAI  
99611





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February 17, 2022

Dear Board of Fish,

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 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.

Ronald Meredith

Chambersburg  
17202



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February 20, 2022

Dear Board of Fish,

36 yr Alaskan resident. Kenai river property owner. Fish heavily in Kenai river.  
Degree in zoology-wildlife mgmt from UC Berkeley. Chairman of Kenai peninsula borough LEPC,  
local emergency planning committee.  
Member of Kenai river special management area advisory board.

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.

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.

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.

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.

Ronald Rogalsky

Kenai  
99611



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March 10, 2022

Dear Board of Fish,

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.

Ronald Shields  
Bristow, VA 20136  
Bristow  
20136



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February 15, 2022

Dear Board of Fish,

I have lived here on the Peninsula now for the past ten years. The king numbers have declined every year reducing the escapement goals is not at all responsible management. Please vote NO on 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.

Ronald Zahacefski



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

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I am from Chignik Bay and have fished with my Dad since I was a little kid. Everyone in Chignik is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. Our economy is built on our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for the Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

**Ronan Kopun**





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February 19, 2022

Dear Board of Fish,

I live in Soldotna for almost 20 years now, serve on the KRSA board and have a passion to keep our rivers filled with fish long after I'm gone., balanced management will accomplish this for generations to come.

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.

Ross Baxter

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

I appose lowering the escapement of King Salmon. I have lived in Alaska 60 years and have watched The king Salmon destroyed. Please do not pass amendment 283Keep the escapement were it is.

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.

Ross Harding

Kenai  
99611



Submitted By  
Roy Howard  
Submitted On  
3/10/2022 3:56:45 PM  
Aff at on

Phone  
9072232251  
Ema  
[G5ces@ao.com](mailto:G5ces@ao.com)  
Address  
2613 Kensington  
Anchorage, Alaska 99508

So I am concerned about the direction of management in Prince William Sound and would encourage you to continue the allowance for small commercial fishermen in this area. Sound shrimp.

In past years with respect to your management of the Prince William Sound shrimp fishery. I am concerned about the curtailing of the small fisheries commercial operation and the management of that. There are many of us who are unable or cannot afford to have personal craft that we can do our own shrimp fishery and so we depend upon the commercial fishermen for our supply of Prince William Sound shrimp.

With regards to management of fisheries, I recall a lecture at the University of Alaska in the 1970s reporting on the Prince William Sound fishery and also the Kachemak Bay fishery for crab and shrimp. To this day we have not been allowed to put pots out in Kachemak Bay. So I am concerned about the direction of management in Prince William Sound and would encourage you to continue the allowance for small commercial fishermen in this area.



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February 17, 2022

Dear Board of Fish,

I have fished the Kenai & Kaslof rivers on my visits to Alaska & have retained a few salmon to eat but normally do catch & release. Please help the Kenai recover from over fishing.

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 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.

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.

russell mcburney

Monterey  
93940



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March 08, 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.

Ryan Howlett

Soldotna  
99669





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March 01, 2022

Dear Board of Fish,

Local Resident and long time user of 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.

Ryan Hughes

Soldotna  
99669



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February 24, 2022

Dear Board of Fish,

I've lived and hunted in Alaska for over 25 yrs. I'm a retired veteran, small business owner and an Airline Pilot. Currently I see our fishery going away in what I feel is the boards interest to promote commercial fisheries over private. The numbers of fish returning are lower yet the board gives commercial operations a higher percentage of the escapement quota to the commercial fleet. With a dwindling harvest I wonder how many members of the board are on the payroll of the commercial fisheries and are not representing the residents of this state.

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.

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Ryan King

Fairbanks  
99712



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February 16, 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 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.

Ryan Morse

Anchorage  
99516



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March 08, 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.

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.

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Ryan Nykamp

Anchorage  
99507





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February 15, 2022

Dear Board of Fish,

Please vote no on 238, the bar is already lower than it should be.

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.

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Ryan Sexton

Meridian  
83646





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February 16, 2022

Dear Board of Fish,

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.

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.

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Samuel Eckhardt



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February 17, 2022

Dear Board of Fish,

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.

SANDRA BARCLAY

Haines  
99827



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February 22, 2022

Dear Board of Fish,

I live in California and have been fishing in the summer months in Alaska for the past 35 years and I am appalled at the fishery mismanagement! I want the king salmon to survive in this river and that, right now, is not possible without some immediate action.

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.

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.

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?

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.

Sandra Ring

Discovery Bay  
94505



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February 16, 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 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.

Sara Hansen  
Bluffdale  
84065



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February 16, 2022

Dear Board of Fish,

Absolutely NO!!!! As a resident of the peninsula this is a slap in the face!! Stop ALLOWING COMMERCIAL FISHING in COOK INLET to DECIMATE KING SALMON!!!

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.

Savage Ditmore  
Sterling  
99672





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March 12, 2022

Dear Board of Fish,

I am a lifelong Alaskan and registered nurse who occasionally sportfishes the Kenai River on years when we need fish in our freezer for our immediate family.

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. Not to mention, many of these commercial fishing vessels are taking resources outside of Alaska.

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.

Savannah Courtright

Eagle River  
99577



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February 15, 2022

Dear Board of Fish,

Live in seattle however make seasonal trips to the kenai targeting specifically kings. Seems this approach would impact the king fishery significantly as nets are non discriminatory. Opposed to prop 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.

Scott Bender



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March 01, 2022

Dear Board of Fish,

I've fished the Kenai River for Kenai Kings for close to 30 years. I have watched the King fishery substantially decline. We are getting close to the point of no return. Very sad to watch a special fishery go away. Please say no to Proposal 283. It's important that every king makes it back in river to save this fishery. Thanks for your time.

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.

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.

Scott Blahnik



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February 15, 2022

Dear Board of Fish,

26 Year Alaskan resident and landowner on the Kenai river since 1999. I have seen and experienced the rapid decline of a world class king fishery to include most king spawning rivers throughout Cook inlet. 283 does nothing to benefit future generations of Alaskans, commercial or sportsman. No on 283!

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.

Scott Coniglio

Anchorage  
99517





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February 15, 2022

Dear Board of Fish,

I'm a Soldotna Local and live work and fish here. You don't lower a goal because you can't reach it. This philosophy will destroy the very last king. We expect when you set a goal you achieve it or work towards it, imagine telling us the general public that we should lower our financial goals, just pay half your mortgage, half your taxes, half your bills.

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.

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.

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.

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.

Scott Daletas

Soldotna  
99669



Submitted By  
Scott Thorne  
Submitted On  
3/9/2022 8:00:46 PM  
Aff at on



PC499  
1 of 1

RE: 282

My name is Scott Thorne. I am a senior permit holder in Area M and have participated in the senior fishery since 1989 both as a skipper and crew member. I also have been fishing blackcod, halibut, cod and pollock out of Sand Point since 1989 and though not a resident, I consider Sand Point somewhat of second home for me and feel very connected to this community.

I am very much against this proposal. My main concern with Proposal 282 is that, as stated in the proposal text, its intent is to "reduce fishing time in the Shumagin Islands and Dog Islands and areas to sockeye salmon escapement to the Chignik River." This intent is contrary to the most recently generated science. The data from the WASSIP study from 2006-2008 illustrates this stating that the harvest impact of early-run Chignik sockeye from the Shumagin Islands fishery ranges from a low of 3.7% to 7%, a level which the board has previously determined, in an earlier finding, to not present a conservation or allocation concern. The Dog Islands area, with a slightly higher harvest impact, has already been significantly restricted.

Additionally, recent action taken by the board to limit Area M harvest in an effort to increase returns to the Chignik system have been shown to have no corollary effect. In 2018 and 2020, the Shumagin Islands and Dog Islands areas were further restricted by emergency order in an attempt to increase returns to Chignik yet this corresponded with a significant drop in the early-run size.

Proposal 282, as it is written, has the potential to reduce fishing time for seniors in the Shumagin Islands by 40% in the June fishery and almost 50% in the post-June fishery. These are obviously massive reductions in fishing time. I think most Area M salmon fishermen would attest that the fishery, currently, is very hot or messy. Reductions like this would render this fishery non-viable, not to mention the negative impacts to a lot of the communities of this area, which are completely reliant on fishing as an economic and social driver.

My desires for the board to not be pressured to make any changes whatsoever until the 2023 meeting cycle when Chignik and Area M are scheduled for evaluation together. At the 2023 meeting, more data from both fisheries can be evaluated as well as other sources of potentially negative influence such as warming ocean conditions that correlate to poor return years and an evaluation of the Chignik watershed as regards to spawning habitat, out-migration, etc.

I am truly sympathetic to Chignik fishermen but think that it's important to say that proximity to an annual salmon fishery does not prove culpability.

Thanks for the opportunity to comment,

Scott Thorne



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March 11, 2022

Dear Board of Fish,

Please no kill on king salmon. We've destroyed most of Alaska's returning king salmon with over harvest.

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 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.

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?

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.

Scott Weedman

Sammamish  
97074



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March 11, 2022

Dear Board of Fish,

I grew up on the Peninsula and fished the Kenai River as a child. I currently run my Guide business "Kenai River Recon" on the Kenai and Kasilof rivers. The Kenai River obviously is very important to me. If this proposal passes more King Salmon will be needlessly taken in order to satisfy the needs of a select group of commercial folks. We haven't made the SEG for the past few years so how will this proposal help to restore our King Salmon run? It won't, so we should not be putting nets out when we haven't even met the OEG. This type of management plan will eventually bring our Kings to near extinction!! We should not abandon our management plan that is currently in place, this is a step backwards in the wrong direction and will only hurt our King Salmon run further! I want to be able to fish for Kings again when the runs are strong enough just like when I was a child down here on the peninsula.

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?

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.

Sean Smart

Sterling  
99669





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March 07, 2022

Dear Board of Fish,

I have been fishing the Kenai since 1987. I guided on the river from 2005 - 2007. I fish the river almost every year and have watched a steady decline on these magnificent creatures. I love fishing for Kings, but have completely given that up on the Kenai. There is no reason other than human greed that these fish have suffered such devastating. I completely oppose anything that can further their demise.

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.

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.

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?

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Shane Redmond

Yuba City  
95993

Submitted By  
Shane T  
Submitted On  
2/17/2021 12:27:59 PM  
Aff at on  
ldk



PC503  
1 of 1

Proposition: 172

I am supporting proposition 172, salmon harvest should be changed from October to May. First, this plan is already working in Canada. Secondly, the saying that the salmon is better before laying eggs may be true, but if they can't lay the eggs then there will be no salmon. Third, we can make more money as a society if we sell them to tourists. Last, most tourists and other Americans don't like the eggs. In conclusion, the salmon season should be changed from October to May if we are considering our future.





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March 01, 2022

Dear Board of Fish,

I urge you to Vote NO on PROPOSAL 283. I live in Soldotna with my husband and three children. I am a lifelong Alaskan and moved to the Peninsula to be closer to the Kenai River. The sustainability of our fisheries is very important to me and I have witnessed first hand the decline of the Kenai River king salmon. We should be taking extreme measures to rebuild this unique stock of fish before its too late. Instead, some members of the Board want to LOWER the goal to harvest sockeye. Nevermind the fact that you're going stomp out the Kenai kings in the process.

This proposal is a step in the WRONG direction. It's only been two years since historic protections were put in place to SAVE THE KINGS.

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.

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.

Shannon Martin

Soldotna  
99669



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February 16, 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 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.

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.

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.

Shaun Churilla

Eagle River  
99577



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March 06, 2022

Dear Board of Fish,

Like logging, commercial fishing's days are numbered. Salmon runs on the Kenai have been mismanaged for years to favor commercial fishing. Time to put the fish first so there are some left for future generations.

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.

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 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.

Shawn Murray

Olympia  
98506



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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.

Sheila Hart

Laurel  
59044



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February 15, 2022

Dear Board of Fish,

We are writing to urge you to vote NO on Proposal 283. Ever since we moved here 17 years ago, the king population has significantly decreased and it seems that the Board just keeps voting year after year for proposals that will eventually totally destroy the king population in the Cook Inlet and Kenai River area altogether just so outside interests can make money and attract tourists who don't give a shit whether the fishery destroyed or not. In other words, you are more interested in money than you are about saving the king fishery. We stopped fishing for kings on the Kenai over 10 years ago when the population started to decrease. We're doing our part, so please do the right thing for a change and Vote No on 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.

Sheryl Miller

Soldotna  
99669





Submitted By  
Sofron Reutov  
Submitted On  
3/10/2022 12:22:13 PM  
Aff at on

Phone  
9073991350  
Ema  
[Safreutov@hotmail.com](mailto:Safreutov@hotmail.com)  
Address  
Po box 563  
Homer, Alaska 99603

He o Mr.Charman and a the board members, I Sofron Reutov own Kodak Tanner permit and due to January 15 opening date. This year 2022 was my first year I tried to go fishing for Tanner in Kodak, I couldn't drop my boat due to very thick ice pack around the boat yard launching dock. I tried once and couldn't break thru the ice, pulled my boat back out, Next day I hired an ice breaker, that ice breaker took 2 1/2 hours to break to the launching dock. That cost me over \$1,800.00. Finally made it out but was late 2 days for the opener and we all know Kodak opener. It was next to impossible to get out of Homer. It would really help Homer feet out, if the opening date would move to February 1st, then the ice pack becomes a lot less challenging. Please consider changing the date to February 1st. Thank you Mr.Charman and a board members



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February 25, 2022

Dear Board of Fish,

I am a sport fisherman mainly on the Kenai river I have not harvested a King salmon in over 10 years because of the low abundance

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.

Spencer Archibald

Soldotna  
99669



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Sent from my iPad. Madam Chair Marit Carlson-Van Dort

My Name is ,STANLEY MACK I'm a commercial fisherman in area M. I have fished all my like in this area. I would like to take this opportunity to express my concern regarding proposal 282. I. Am STRONGLY opposed to this proposal. And the board allowing to take the proposal out of sequence..This proposal will do nothing that will increase the return of the fishery in CHIGNIK. But have a major impact on the communities in this area..

I would like to introduce (4) important web sites that state very clear what the problem is..

1.BLACK LAKE ECOSYSTEM RESTORATION TECHNICAL REPORT.

2>NOAA FISHERIES\_\_march 05 2018 report—nearshore habitat for young salmon and other wildlife is slowly disappearing in CHIGNIK ALASKA

3-VOLCANOES AND EELGRASS TRANSFORM SALMON HABITAT

4-NATURAL HAZARDS,FISH HABITAT andFISHING COMMUNITIES IN ALASKA..

Madam Chair <each on of these web sites give the folks ,including the aqua culture non profit.group,a warning that the BLACK LAKE has a very serious problem.,and if this problem is not fixed ,one day ,i`m afraid that ,it might be to late...In doing my research I for out there are programs available to help fix this problem..

1 HABITAT RESTORATION

2 PACIFIC COASTAL SALMON RECOVERY FUND...

There is a lot more sites available..

I will be talking more about this issue at the meeting..also I would like to take this time to let you know that there is also a site on ALASKA CURRENT,this site showed us the current along the AK. Peninsula..I will explained the direction of the current and the natural habit of the salmon.

Also I read the WASSIP study and I found nothing that said the total run for CHIGNIK AND THE BLACK LAKE pass through this area.. just some first hand info,MY experience,The salmon that are being caught at DOLGOI all heading west.I know this,Because I drift gillnetter and have followed these fish from DOLGOI to UNAMAK..ALL MIXED STOCK.And the last few years the pinks have been taking over..

Madam Chair ..Thank you .....Stanley Mack..



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February 16, 2022

Dear Board of Fish,

Please protect the King Salmon

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.

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.

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.

Stephen Duprey  
Fairbanks  
99709



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February 20, 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.

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.

Stephen Helms

Anchorage  
99519





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March 10, 2022

Dear Board of Fish,

I MOVED TO ALASKA IN 1981 AND I HAVE FISHED THE KENAI EVERY SUMMER SINCE.

i HAVE NEVER CAUGHT A KING SALMON OVER 50 POUNDS BUT I STILL LOVE THE BIG FISH.

I HAVE KEPT KINGS IN THE 25-40 POUND RANGE AND I HAVE HELPED FRIENDS NET BIGGER FISH. GOOD TIMES!

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 Kings have been overfished and I have to wonder if I will ever see another King above 50 pounds.

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. It may be the beginning of the end for King salmon and the end of international tourists who come to the Kenai for a big fish. Catch and release is not the answer either. If a big King is fought for a while to give the fisherman that special experience, there is a good chance the fish will die before it can 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. We owe it to future generations.

STEPHEN Kehl

Kenai  
99611



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February 16, 2022

Dear Board of Fish,

I have lived in Alaska for 40 years. I have worked on salmon seiners, long liners and in fish processing. I have seen fisheries become shadows of their former abundance including Dungeness crab, pot shrimp, king crab and halibut ( a federal travesty). King salmon are on the ropes and your duty is to the people of Alaska and the resource. It is not to assure that the last king is shrink wrapped. Manage for the scarcity. King stocks have fallen drastically under your management. Fix it.

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.

Stephen R Poggi

Eagle River  
99577



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March 01, 2022

Dear Board of Fish,

My name is Sterling Lyman owner and operator of Absolute Alaska Adventures. We guide on the Kasilof River and book over 100 trips a year on the Kenai. Please do not lower escapement goals and focus on the future of our rivers and our fishing livelihoods. It is time that the future of fishing, the residents of Alaska along with sport fishermen take a front seat to commercial fishing profits!

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 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.

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.

Sterling Lyman

SOLDOTNA  
99669



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February 16, 2022

Dear Board of Fish,

36 year Alaska resident that enjoys the thrill of having a nice Chinook on the line. Equally as enjoyable and most satisfying is consuming that fish. Chances for a successful harvest have declined dramatically since the 80's.; both in the MATSU and on the Kenai. Please ensure this opportunity can be sustained, and enhanced, for the current and future generation of anglers. Please vote no on Proposal 283. Thank you in advance.

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.

Steve Gordon  
Palmer  
99645





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February 15, 2022

Dear Board of Fish,

I've lived in Anchorage since 1978.

I love to participate in dip netting on the Kenai river.

I strongly oppose any changes that put Less Fish in the Kenai.

The residents of the State should benefit from our resources, not a Seattle based fleet.

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 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.

Steve Harris

Anchorage  
99516





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Dear Members of the Board,

Attached please find a technical analysis that estimates optimum harvest rates, optimum escapement, and harvest policy considerations for Black Lake and Chignik Lake sockeye salmon stocks (Proposal 282). These results were based on sockeye salmon escapement and total return data for Chignik region collected between 1922 and 2021. In short, the data suggest that current escapement goals are conservative with respect to escapement levels associated with maximum sustainable yield. Data from recent decades for both of these stocks are less informative about optimum escapement; however, the data are informative about about the optimum harvest rate. Therefore, implementing a fixed harvest-rate policy would be of higher utility in comparison to a fixed escapement policy. Run-size forecasts and monitoring of in-season exploitation rates are necessary to successfully implement a harvest-rate policy.

Thank you for your consideration,

Steve

Steve Martell

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# Estimates of Optimal Escapement and Harvest Rates for Chignik Sockeye Salmon Stocks (Proposal 282)

Steve Martell PhD., Sea State Inc., Bainbridge Island WA, 98110

3/8/2022

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# 1 Executive Summary

Estimates of optimal escapement rates and optimal harvest rates for Chignik and Black Lake sockeye salmon stocks were obtained by fitting stock-recruitment models to brood table data for these two stocks. Models were fit to two different data sets representing a long time-series and a short time-series. The data set contains additional changes to correct for improvements in stock identification and methods for allocation catch to early and late runs.

For Black Lake (Early Run), maximum likelihood estimates (MLE) of  $S_{MSY}$  range from 356,000 to 521,000 based on the long and short time-series data sets, respectively. For Chignik Lake, the MLE estimates for  $S_{MSY}$  range from 296,000 to 356,000 based on the short and long time-series data sets, respectively. The 95% credible interval for  $S_{MSY}$  for Black Lake ranges from 327,000 to 625,000 based on the long time-series. For Chignik Lake the 95% credible interval is 248,000 to 498,000.

The probability that an escapement target of 450,000 for Black Lake is less than  $S_{MSY}$  is conservative based on all of the available data ( $p(450,000 < S_{MSY}) = 0.64$ ). The median value (risk neutral) for an escapement target that corresponds to  $S_{MSY}$  is approximately 420,000.

The probability that an escapement target of 400,000 for Chignik Lake is less than  $S_{MSY}$  is also very conservative  $p(400,000 < S_{MSY}) = 0.83$  based on all available data. The median value (risk neutral) value for an escapement target that corresponds to  $S_{MSY}$  is approximately 321,000.

As a result of long-term fixed escapement policies, data from recent decades provide little contrast to precisely estimate optimal escapement  $S_{MSY}$ . However, precision in the estimates of optimal exploitation rate ( $U_{MSY}$ ) are well informed by the variation in the observed total annual returns ( $R$ ) versus the relatively constant annual escapement ( $S$ ).

During periods of low marine survival rates that result in poor adult returns, a fixed harvest-rate policy would allow for fisheries to continue under certain conditions that limit fishing mortality. Fixed harvest-rate policies would require run-size predictions and in-season monitoring of exploitation rates.

# 2 Introduction

Escapement objectives for the Chignik river sockeye salmon are based on a range, where the current escapement goals are set at 350,000 to 450,000 thousand for Black Lake, and 220,000 to 400,000 thousand for Chignik Lake.

Estimates of optimum escapement and optimal exploitation rates for semelparous salmonid species can be obtained from fitting stock-recruitment models to escapement and total run size data. The simplest form involves fitting a linear model to the logarithm of returns per spawner versus spawners. The intercept of this regression defines maximum recruits per spawner, or the slope at the origin of the stock-recruitment curve. The slope of the regression line defines how survival rate changes with changes in escapement levels. Estimates of maximum sustainable yield reference points are obtained by solving the system of equations for  $\partial R/\partial S - C = 0$ ; in other words, where average catch is equal to average surplus production.

The simplest model that has been widely applied to sockeye salmon stocks in North America is the Ricker model  $R/S = -S$ . Schunte and Kronlund (1996, Can J. Fish. Aquat. Sci 53:1281-1293) noted that there is no analytic solution for the MSY-based reference points when solving this equation. However, the reverse transformation of solving and from estimates of  $S_{MSY}$  and  $U_{MSY}$  do exist. This same management-oriented approach was used to obtain estimate of reference points and the associated uncertainty. The overarching objective is to determine the probability of a given escapement target exceeding the optimum escapement that would produce the maximum sustainable yield. In this paper, a probability distribution for  $S_{MSY}$  was constructed by fitting a stock-recruitment model to the observed total return and escapement data using a Bayesian approach.



### 3 Analytical Methods

This section describes the data and methods used to address the overarching question – what is the probability of specific escapement targets exceeding the level that would produce the maximum sustainable yield?

#### 3.1 Data

Escapement data ( $S$ ) and total annual returns ( $R$ ) by brood year for early and late run Chignik sockeye salmon were obtained from Alaska Department of Fish and Game. There are two separate data sets: a short time-series spanning 1983 to 2013 and a long series dating back to 1922 to 2013 (Figure 1).

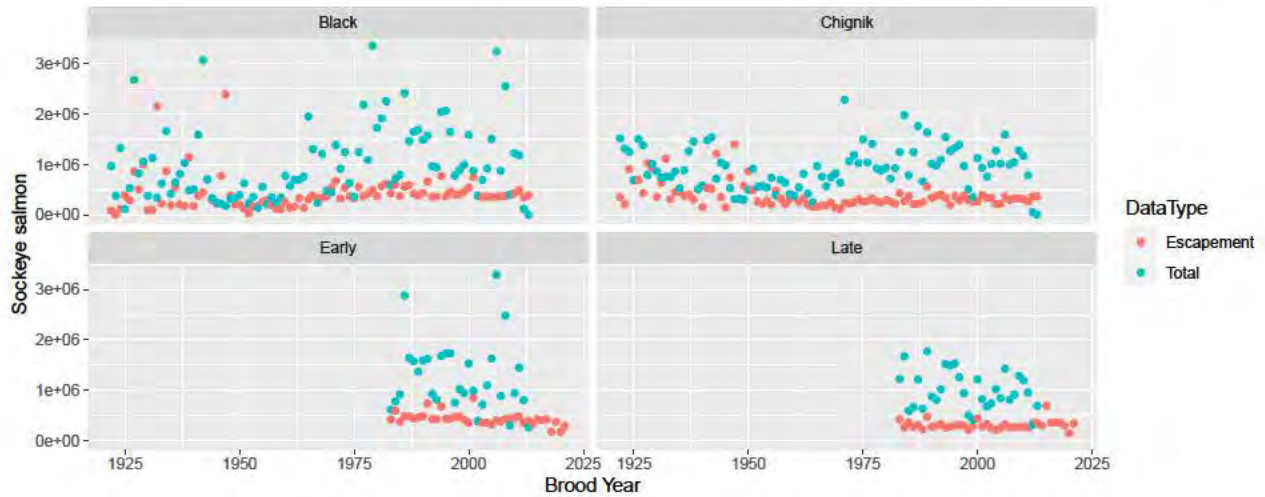


Figure 1: Time-series data sets for Total Run and Escapement for Chignik sockeye salmon stocks (Early Run = Black Lake and Late Run = Chignik Lake). The top row are the full data set from 1922 to 2013, the bottom row are the short time-series from 1983 to 2013 for Total Run and 1983 to 2021 for the Escapement.

#### 3.2 Stock Recruitment Models

The Ricker stock recruitment model can be transformed into a linear model, where a linear regression model was then fitted to the Escapement ( $S$ ) data (independent variable) versus the logarithm of the total returns per spawner ( $\ln(R/S)$ ) for each of the four aforementioned data sets.

$$\ln(R/S)_i = \alpha - \beta S_i + w_i.$$

The relationship between the regression parameters  $\alpha$  and  $\beta$  and the policy parameters  $U_{MSY}$  and  $S_{MSY}$  is given by

$$\alpha = U_{MSY} - \ln(1 - U_{MSY}), \quad \beta = U_{MSY}/S_{MSY}.$$

It is of note that there is no analytical solution for  $U_{MSY}$  in aforementioned definition of  $\alpha$ , and that efficient numerical methods exist to solve the equation for  $U_{MSY}$ . Point estimates of  $\alpha$  and  $\beta$  obtained from the linear regression fits represent the maximum likelihood estimates for the Ricker model. Maximum likelihood estimates of  $U_{MSY}$  and  $S_{MSY}$  from the regression fits to the short time-series data are shown in Figure 2 and the long-time series data in Figure 3.



### 3.3 Bayesian Estimates

Uncertainty in the policy parameters was estimated using a Bayesian approach. The joint posterior distribution ( $p(\theta|S, R)$ ) for the model parameters given the data is estimated by numerical integration using MCMC methods implemented using Jags in R.

$$p(\theta|S, R) \propto l(S, R|\theta)p(\theta) \propto l(S, R|S_{MSY}, U_{MSY}, \tau^2)p(S_{MSY})p(U_{MSY})p(\tau^2)$$

The marginal posterior distributions for the policy parameters  $S_{MSY}$  and  $U_{MSY}$  were estimated using the same linear regression model to predict the  $\ln(R/S)$ , where the residual error terms are assumed normal with and estimated precision term  $\tau^2$ . A non-informative beta prior distribution was assumed for  $U_{MSY}$ , and a weak log-normal prior for  $S_{MSY}$  with a log mean of 6.5 and a variance of 9.0. Further, bounds ranging from 0 to 3 million spawners for  $S_{MSY}$  were assumed for all data sets. A non-informative gamma prior was assumed for the precision parameter ( $\tau$ ).

## 4 Results

### 4.1 Maximum Likelihood Estimates

Maximum likelihood estimates of  $S_{MSY}$  and  $U_{MSY}$  from Ricker model fit to the short time-series data are shown in Figure 2.

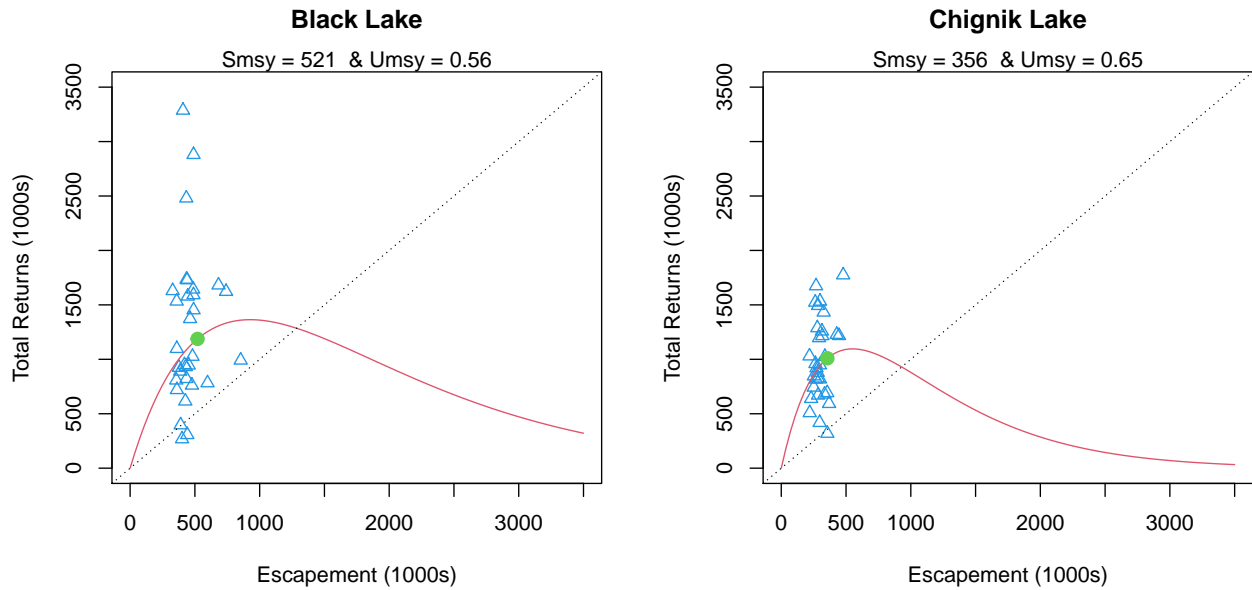


Figure 2: Ricker model fits to the short time-series stock-recruitment data for Black and Chignik Lake sockeye salmon. Data span 1983 to 2013 and the large green circle corresponds to the MSY estimates for escapement and total returns. Policy values for each model fit is noted in the figure subtitle.

Maximum likelihood estimates of  $S_{MSY}$  and  $U_{MSY}$  from Ricker model fit to the long time-series data are shown in Figure 3.

Restricting the data between 1922 and 1982 results in increasing the reference point estimates from 356,000 to 521,000 for  $S_{MSY}$  in Black Lake. A similar increase also occurs in Chignik Lake, where estimates of  $S_{MSY}$  increase from 296,000 thousand to 356,000 thousand. The origin of the stock recruitment relationship, which informs  $U_{MSY}$  is relatively unchanged when restricting the model fit to the short time-series. Black Lake



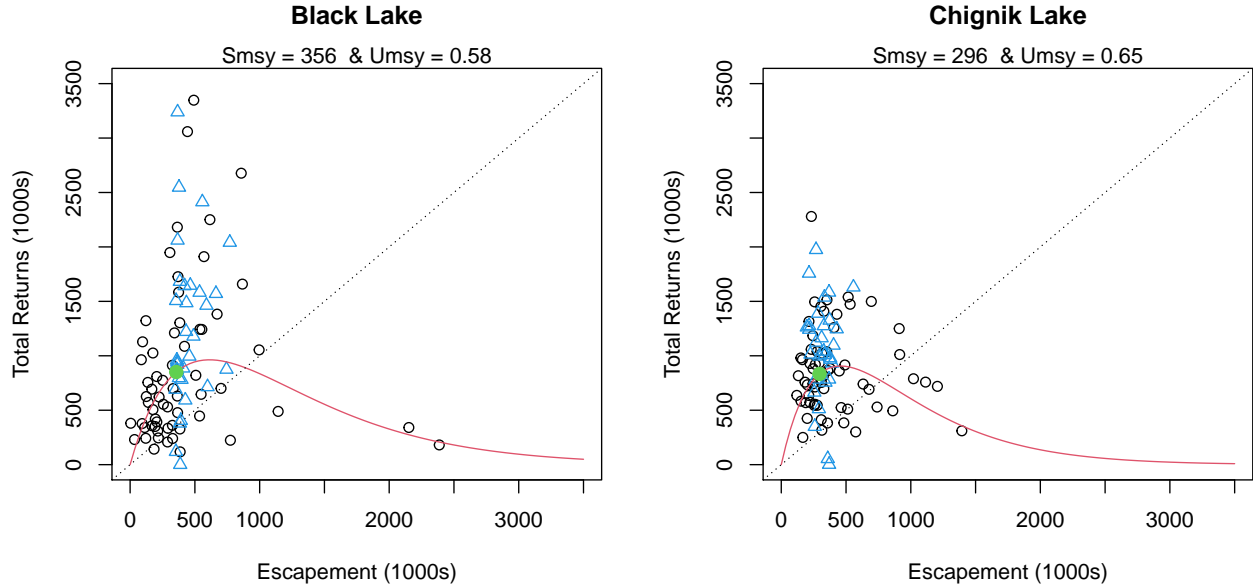


Figure 3: Ricker model fits to the long time-series stock-recruitment data for Black and Chignik Lake sockeye salmon. Data span 1922 to 2013, where the blue triangles correspond to data from 1983 and later.

estimates of  $U_{MSY}$  are approximately 0.58 per year and the optimal harvest rate ( $U_{MSY}$ ) for Chignik Lake is approximately 0.65.

Data prior to 1983 are informative about the maximum stock productivity; as a large number of escapement values were below the estimated  $S_{MSY}$  for both early and late run stocks. One of the results of managing a stock using fixed escapement is that the annual escapement values tend to concentrate around the target. This is observed in 3 when you compare the early data (open circles) with the contemporary data (triangles). Moreover, the longer time-series data is also more informative about density dependent effects at high spawner abundance than the short time-series. Again, a fixed escapement harvest policy would harvest the surplus above  $MSY$ , resulting reduced contrast in spawner abundance data in which to estimate  $S_{MSY}$  with higher precision.

## 4.2 Bayesian Model Output

### 4.2.1 Optimum Escapement

The results shown in Figure 4 were constructed using the marginal posterior samples for  $S_{MSY}$  from the Bayesian model. These cumulative probability density functions represent the probability of an Escapement target ( $S$ ) exceeding  $S_{MSY}$  based on the Ricker stock-recruitment model.

The probability of the escapement target of 350,000 to 450,000 for Black Lake is less than  $S_{MSY}$  is  $p(220,000 < S_{MSY}) = 0.01$  to  $p(450,000 < S_{MSY}) = 0.11$  based on the short time-series (Figure 4). For the long time-series data set, these probabilities change to  $p(220,000 < S_{MSY}) = 0.13$  to  $p(450,000 < S_{MSY}) = 0.64$  (Figure 4). For Chignik Lake, the escapement targets range between 220,000 and 350,000 spawners. The probability that these escapement targets are less than  $S_{MSY}$  is  $p(220,000 < S_{MSY}) = 0$  and  $p(400,000 < S_{MSY}) = 0.08045$ . Based on the long time-series, the probabilities are  $p(220,000 < S_{MSY}) = 0.0043$  and  $p(400,000 < S_{MSY}) = 0.83$ . Note that a value of 0.83 is equivalent to 83 chances out of 100, or 83%.

Using the results of Figure 4 the 5th and 95th credible interval for estimates  $S_{MSY}$ , along with the medial values, are summarized in Table 1. Credible intervals for the optimal exploitation rate  $U_{MSY}$  are summarized in Table 2.

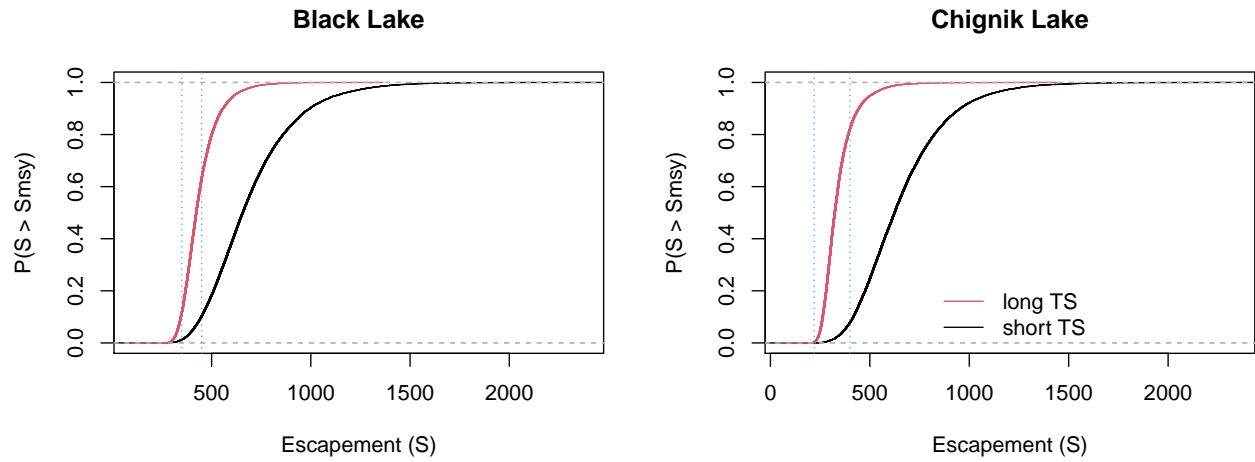


Figure 4: Empirical cumulative density distributions for the posterior samples for  $S_{MSY}$  based on the Ricker model. The red line is based on all data (1922 to 2013) and the black line is based on the short data set (1983 to 2013). The vertical dotted lines correspond to the current escapement goals.

Table 1: Estimates of  $S_{MSY}$  for Early (Black Lake) and Late run (Chignik Lake) ‘sockeye salmon stocks based on a long time-series (1922-2013) and a short time-series (1983-2013).

	Early 1983:2013	Early 1922:2013	Late 1983:2013	Late 1922:2013
5%	404	326	370	248
50%	654	420	622	321
95%	1127	612	1083	502

Table 2: Estimates of  $U_{MSY}$  for early and late run Chignik sockeye salmon stocks based on a long time-series (1922-2013) and a short time-series (1983-2013).

	Early 1983:2013	Early 1922:2013	Late 1983:2013	Late 1922:2013
5%	0.42	0.44	0.51	0.47
50%	0.52	0.54	0.57	0.59
95%	0.64	0.63	0.65	0.69

The data and results of this modeling exercise have demonstrated that estimates of  $U_{MSY}$  are much more robust than estimates of  $S_{MSY}$ . However, implementing a fixed harvest-rate policy requires a prediction about how large the total returns will be prior to the start of the fishery. The optimal annual catch each

yields during periods of higher than average returns. limited opportunities during periods of low returns; however, this comes at the expense of trading off large of the total returns. A fixed harvest-rate policy is less disruptive to the fishing community as it allows for policy (i.e., status quo), or (2) adopt a fixed harvest-rate policy, where annual harvest takes a fixed proportion There are two contrasting harvest policy options that the Board of Fish could consider: (1) a fixed escapement

## 5.2 Harvest Policy Considerations

Based on the observed data and assumptions herein, the results suggest that the current upper escapement range for Black Lake and Chignik Lake are conservative with the odds that they are above the optimum  $S_{MSY}$  value greater than 60/100 and 80/100, respectively.

## 5.1 Conclusion

Finally, estimates of optimum escapement should not be thought of as a conservation threshold target associated with the probability of extinction. There are many instances where both of these stocks have fallen below the combined threshold escapement limits, and yet the resulting returns per spawner can still be well above average. Specific conservation thresholds that are a function of the management parameters (e.g., 10% and 50% of  $S_{MSY}$ ) should be established such that appropriate decision tables can be constructed to assess outcome of alternative management actions. Under a fixed exploitation-rate harvest policy, these conservation limits would trigger a closure if the predicted returns fell below defined conservation thresholds.

An additional assumption that may bias policy parameters is the assumption of no error in the annual escapement estimates. In practice, there is observation error, as the escapement estimates are based on extrapolations from weir count data. In this assessment, and previous assessment of optimal escapements, all of the error structure is assumed to be model process error – in this case variability in survival rates from egg to adult. A linear mixed effects model would be more suitable for exploring the impacts of observation errors on policy parameters.

There are many assumptions in the underlying data, the least of which is that the regression estimates of the model parameters assume the underlying observations are independent. It is well known that stock-recruitment data violate this assumption and this usually leads to a bias in the management parameters. In the literature, this is known as time-series bias, and there have been many failed statistical attempts to correct for it. The direction of the bias is well known, and usually results in biased estimates of the slope at the origin (or  $U_{MSY}$ ) based on simulation studies. Furthermore, most stock-recruitment data sets show a negative correlation between the estimated policy parameters (i.e.,  $U_{MSY}$  and  $S_{MSY}$  in this case).

Based on the full time-series data, the upper range for escapement bounds for Chignik Lake sockeye salmon stocks are slightly conservative. Moreover, the lower range is well defined by the available data. The more contemporary data suffer from good management success, where inter-annual variation in annual escapements has been minimized at the expense of maximizing surplus harvest. Estimating the optimal escapement requires significant contrast in the independent variable which is in complete contradiction to fixed escapement harvest policies. However, due to natural variation in marine survival rates, the total return and escapement data are informative about the optimal exploitation rate.

## 5 Discussion

Marginal posterior samples (e.g., trace plots) and probability density functions for model parameters are summarized in the Appendix.



year is then set equal to  $U_{MSY}$  times the predicted total returns. If such a prediction, or in-season run-size estimate, is not available, then other management measures that limit exposure such as closed areas, gear, or effort restrictions would have to be designed to limit exploitation rate to below  $U_{MSY}$ . The simplest of policies would be, "If you don't want to catch more than 50% of the fish, then don't open more than 50% of the fishing grounds" (Carl Walters, 1999). Moreover, if the prediction over-estimates abundance, then its more likely that over-exploitation could occur without in-season monitoring of catch rates. This in-season monitoring is akin to in-season monitoring of escapement estimates. In years where the stock prediction is less than the realized, then there is no conservation risk associated with the prescribed fishery.



## 6 Appendix

### 6.1 Symbols and Definitions

Table 3: Definition of variables and symbols used in this document.

Variable	Symbol	Description
Return data	$R$	Total number of returns (catch + escapement)
Escapement data	$S$	Annual adult escapement to spawning grounds
Returns per Spawner	$R/S$	Total returns per spawner brood year
Intercept		Maximum returns per spawner at the origin of the S-R curve
Slope		Density dependent term for the Ricker S-R curve
Optimum escapement	$S_{MSY}$	Escapement associated with Maximum Sustainable Yield
Optimum exploitation rate	$U_{MSY}$	Harvest rate that will achieve Maximum Sustainable Yield
Estimated parameter vector	$\theta = \{U_{MSY}, S_{MSY}, \tau^2\}$	vector of unknown parameters to be estimated from the data

### 6.2 Escapement and Total Return Data

Table 4: Escapement and Return data for Black Lake (Early) and Chignik Lake (Late) sockeye salmon data used in this assessment.

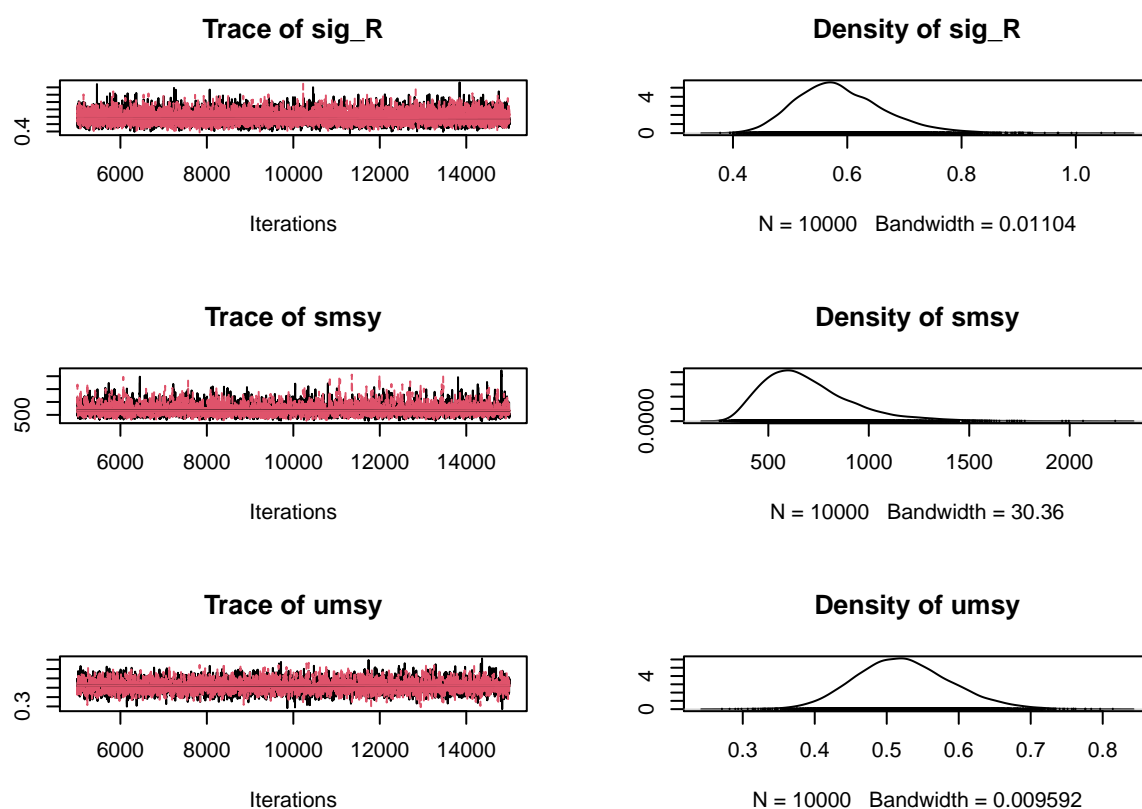
Year	Early S	Early R	Late S	Late R	Both S	Both R
1983	426177.7	615358.8	428034.3	1227156.2	854212.0	1842515.0
1984	597712.8	782694.1	268495.0	1673664.4	866207.8	2456358.5
1985	376578.0	924150.1	369260.0	592771.8	745838.0	1516921.9
1986	489566.2	2879788.4	283752.8	669717.5	773319.0	3549505.9
1987	486989.8	1643481.4	316753.2	1215574.4	803743.0	2859055.9
1988	444906.8	1579015.2	230850.2	638753.3	675757.0	2217768.5
1989	462967.8	1372353.5	478207.2	1773875.0	941175.0	3146228.6
1990	489086.7	1591721.3	281323.3	878566.8	770410.0	2470288.1
1991	740783.1	1622395.0	299314.9	817948.2	1040098.0	2440343.2
1992	429736.1	931302.2	336866.9	1024861.1	766603.0	1956163.3
1993	434924.4	821734.6	262452.6	1523354.6	697377.0	2345089.2
1994	682447.3	1681172.4	284461.7	1492964.6	966909.0	3174137.0
1995	440857.1	1729043.3	299062.9	1532720.8	739920.0	3261764.1
1996	435298.2	1734007.2	313838.8	1258196.0	749137.0	2992203.2
1997	477220.2	761236.7	298397.8	947540.5	775618.0	1708777.2
1998	481516.0	1025966.9	219612.0	508225.5	701128.0	1534192.4
1999	419636.0	948636.6	296330.0	418219.3	715966.0	1366855.9
2000	359544.2	1533530.6	445692.8	1216688.4	805237.0	2750219.0





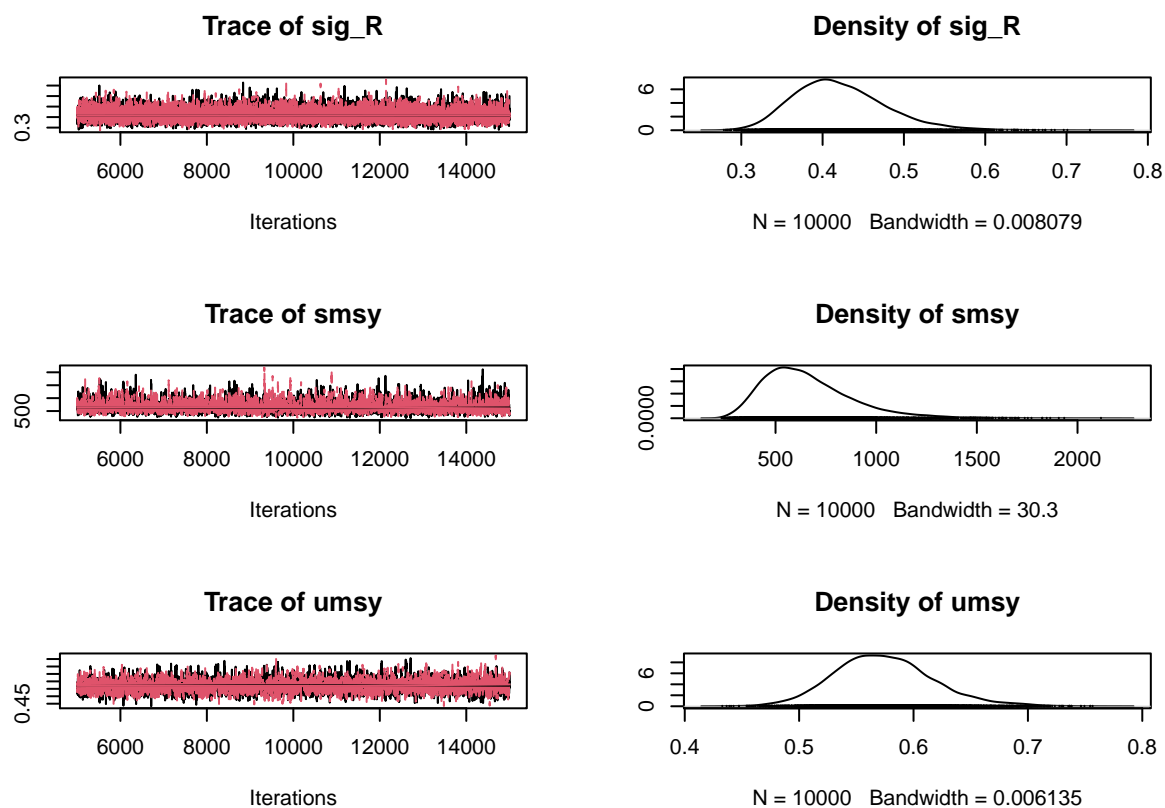
Year	Early S	Early R	Late S	Late R	Both S	Both R
2001	853473.2	991394.1	283444.8	826462.7	1136918.0	1817856.9
2002	390094.0	396808.3	334222.0	678699.2	724316.0	1075507.5
2003	361105.8	720022.0	250883.2	742696.3	611989.0	1462718.3
2004	360329.9	1097874.7	217930.1	1029374.7	578260.0	2127249.4
2005	328506.1	1629417.1	251950.9	846077.3	580457.0	2475494.4
2006	408232.9	3286885.1	327259.1	1432148.2	735492.0	4719033.3
2007	386728.3	889779.4	268244.7	816686.0	654973.0	1706465.5
2008	433841.0	2480092.8	272215.0	920422.0	706056.0	3400514.8
2009	441557.1	306971.2	278504.9	1288340.3	720062.0	1595311.5
2010	452191.3	946042.2	291721.7	1196759.0	743913.0	2142801.2
2011	489903.0	1452925.9	263913.0	959175.8	753816.0	2412101.7
2012	356512.6	808379.2	355878.4	318944.7	712391.0	1127323.9
2013	401051.6	268395.5	355050.4	691694.3	756102.0	960089.8
2014	342403.6	NA	309206.4	NA	651610.0	NA
2015	426817.0	NA	697082.0	NA	1123899.0	NA
2016	410921.9	NA	362253.1	NA	773175.0	NA
2017	428349.7	NA	364211.3	NA	792561.0	NA
2018	182991.5	NA	356706.5	NA	539698.0	NA
2019	379444.5	NA	302554.5	NA	681999.0	NA
2020	179200.4	NA	151777.2	NA	330977.6	NA
2021	296032.6	NA	344909.1	NA	640941.6	NA

Posterior samples for the early run short time-series.



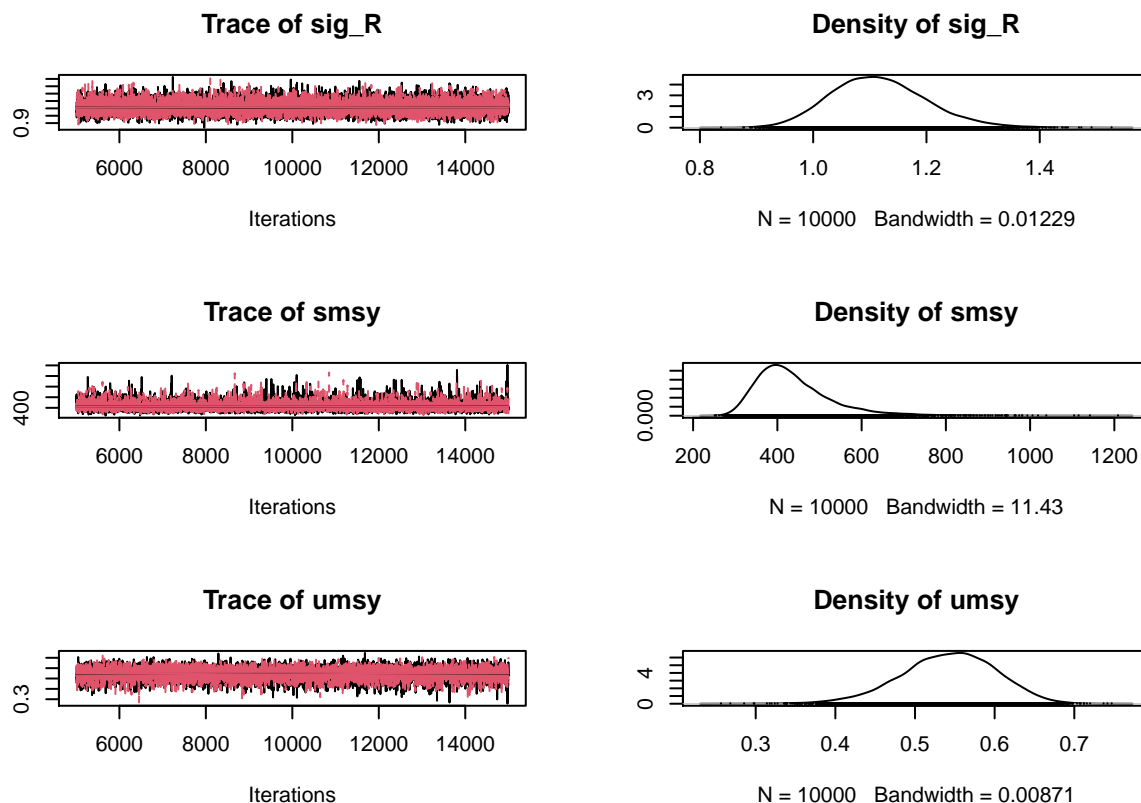
Posterior samples for the late run short time-series..

```
plot((t2$samples))
```



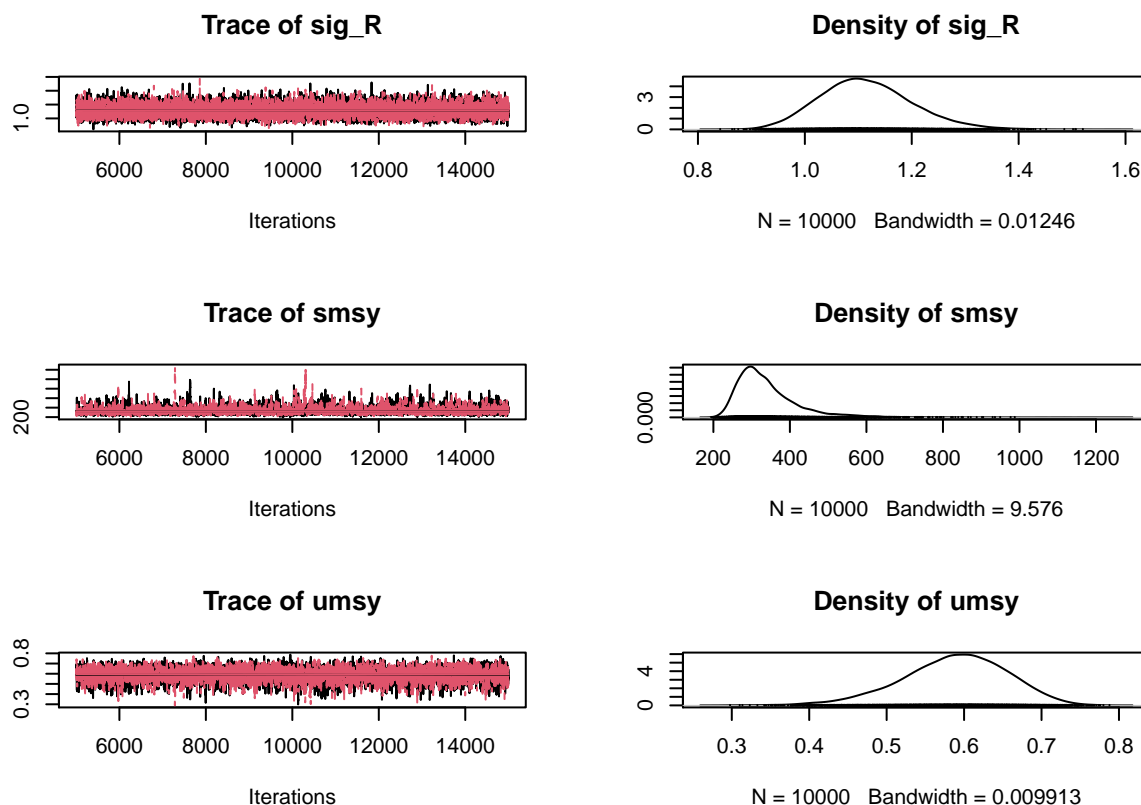
Posterior samples for the early run long time-series.

```
plot((t3$samples))
```



Posterior samples for the late run long time-series.

```
plot((t4$samples))
```





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March 08, 2022

Dear Board of Fish,

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?

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.

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.

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.

Steve O'Hara

Anchorage  
99516



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February 24, 2022

Dear Board of Fish,

I am a resident, lives here, works here, pays taxes and trade economically in Alaska. I employee 10 persons full time contributing to all of the communities. Allowing a group to commercialize our natural resource and use it for gain is not the value the board should be visualizing. the economic growth in communities relies on residences permanent in nature. Not a seasonal asset, seasonal help or taking from one of our treasured features. An Alaska resident has to survive a long winter and work hard for a short window to fish. Many times that window is the only opportunity to get some work done. Making it even more difficult to enjoy the summer in Alaska. If there is not enough fish then it should be across the board and equal to all. No group deserves a right to state they benefit a community more then the other. If there are no employees working year round then communities will suffer a greater consequence then the fishing community provides. The resource of Alaska needs to be used wisely to grow the community as a whole not one group who is profiting from the one treasured resource. Protect everyone, treat all the same. If I cant hire and keep employees then infrastructure will suffer with higher cost of employment and less available employees. We all like to fish, we all deserve the same chance as well as same limits. I don't sell my resource I use and enjoy it personally. As I should and deserve after a long winter.

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.

Steve OHara

Anchorage  
99507





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February 19, 2022

Dear Board of Fish,

This is a bad idea. We shouldn't be attempting to exploit one species at significant risk of another threatened species for monetary gain.

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?

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.

Steve Pearson  
Anchorage  
99503



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March 07, 2022

Dear Board of Fish,

The messages checked below are plenty.

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.

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 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.

Steve Shields

Carrollton  
75006



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February 16, 2022

Dear Board of Fish,

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.

STEVEN BLAHA

Willow  
99688



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February 15, 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.

Steven Brown  
Soldotna  
99659



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February 18, 2022

Dear Board of Fish,

Having fished the Kenai for 25 years, I have seen the decline just in that time of the fishery on the Kenai, smaller and far fewer Kings, please vote no to save the kings, thank you

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.

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.

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.

stuart ennis

naches  
98937





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February 25, 2022

Dear Board of Fish,

I have lived on the Kenai Peninsula for 24 years. I have raised my children here; I will retire here. I'm both former Executive Director of the local tourism office as well as the former GM of a local seafood processor. I also enjoy sportfishing. It is clear to me that "the Kenai" without king salmon won't be the Kenai as we know it, and Proposal 283 further risks that outcome.

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 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? Commercial fishing certainly plays a vital role in our local economy, but sportfishing is the industry that has a significantly bigger impact. So many of the other tourism-based businesses (whale watching, bear viewing, bars/restaurants, etc.) would drastically decline without folks coming here to fish. And sportfishing enthusiasts understand that harvesting king salmon, whether by fishing pole or set net, is not a wise choice.

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.

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.

Summer Lazenby

Soldotna  
99669



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February 17, 2022

Dear Board of Fish,

Live in PA. Visit and fish the Kenai River at least twice a year. Please vote No on proposition 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.

kirr susan

Canonsburg  
15317



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March 10, 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.

Susan P Nelson

Sterling  
99672



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February 18, 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.

Sydnee Allen  
Riverdale  
84405





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March 08, 2022

Dear Board of Fish,

Do not allow this to pass

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.

Tally Stone

Puyallup  
98375





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February 20, 2022

Dear Board of Fish,

I have fished my entire life. Conservation is the only way to preserve for generations.

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.

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.

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.

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.

Taylor Fitterer

Brainerd  
56401



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February 16, 2022

Dear Board of Fish,

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.

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Taytum Helgesen



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February 15, 2022

Dear Board of Fish,

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.

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Ted Smith

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

I have been fishing the Kenai for 70 years and previously enjoyed fishing for kings. I stopped fishing for kings due to declining numbers. Most of the long-term fishers have likewise done so to have a unique resource. The Kenai's biggest problem is greed by one group of users regardless of the conservation impact.

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.

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Ted Wellman

Sterling  
99672-9329





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February 18, 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.

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.

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Terry Bateman

Fairbanks  
99709





Submitted By  
Theresa Peterson  
Submitted On  
3/11/2022 4:30:16 PM  
Aff at on  
Alaska Marine Conservation Council

March 11, 2022

Board of Fish Comments

Boards Support Section

P.O. Box 115526

Juneau, AK. 99811

**PROPOSAL 264 – OPPOSE** - Amend regulation requiring operation of Dungeness crab pot gear once within a 14-day period.

**PROPOSAL 265 – OPPOSE** - Repeat regulation requiring operation of Dungeness crab pot gear once within a 14-day period.

**PROPOSAL 266 – SUPPORT- 750 POT LIMIT portion of proposal** - Establish Kodiak District Dungeness crab pot limits.

**PROPOSAL 268 – SUPPORT**- Adopt a new Tanner crab harvest strategy used to set annual harvest limits in the Kodiak, Chignik, and South Peninsula districts.

**PROPOSAL 270 – SUPPORT** - Amend pot limits for Kodiak District Tanner crab.

Dear Charles Carson-Van Dort and Members of the Board of Fish,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners, and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans. As a marine conservation group formed by commercial fishermen around the State in 1994, we appreciate the opportunity to provide input on conservation and community considerations on proposed management changes to the Dungeness and Tanner crab fisheries.

AMCC is **opposed to proposals 264 and 265** which seek to amend or repeat the 14-day requirement to haul Dungeness crab pots. Regular hauling of gear is a common practice for commercial fishermen to minimize impacts on the target species, bycatch species, and habitat. In addition, regular hauling of gear reduces impacts on fishermen and gear types prosecuting different fishermen in the same region. Regular hauling of crab pots benefits the conservation of the crab stocks by reducing lost gear and reducing ghost fishing mortality. When crab pots are left untended for weeks at a time they are more vulnerable to loss due to storms, waves, entanglement, getting buried in the sediment and algae growth. Crab stuck in pots buried by sand will eventually die. In our discussions with longtime Dungeness fishermen, fishermen have noted an increase in soft crab in recent years. Local observations have found that the soft crab do not harden up when stuck in a crab pot. Gear loss contributes to increased mortality of Dungeness, Tanner and king crab through ghost fishing and the impacts are increased when the fishery is concentrated in a small area. As noted in the ADF&G staff comments, from 2016 to 2020, 69% of the Kodiak District Dungeness crab was taken from three statistical areas, Trinity Islands, Adak Bay and Ugak Bay and within those areas gear is further concentrated in preferred fishing grounds.

ADF&G staff comments for proposals 264 and 265 note: *Studies from SE Alaska, British Columbia, and Puget Sound estimate Dungeness crab ghostfishing mortality due to lost pots at 2–7% of the annual Dungeness crab harvest. Applying these estimates to the 10-year average harvest for the Kodiak District (295,000 crab) equates to an estimated annual ghost-fishing mortality of 5,900–20,650 Dungeness crab. A study in Women's Bay near the City of Kodiak published in 2014 additionally estimated 16–37% of smaller sized red king crab (60mm) present in the study area were killed annually due to ghost fishing during the study period (1991–2008).*

In sum, AMCC believes that consistent and regular hauling of baited Dungeness gear is better for health of the crab stocks and the current 14-day requirement is best for the overall conservation of the resource. It is important to note that this currently legal to open the doors and remove bait when a vessel anticipates being away from the crab pots for more than 2 weeks. The gear can be left in the water but not actively fishing for extended periods of time.

**Proposal 266** seeks to establish Dungeness pot limits and restrict concurrent fishing. After significant community discussion, AMCC supports limiting the fishery to 750 pots and maintaining the historical fishing patterns of vessels to participate in other commercial



fshermen. It is common practice in Kodiak to leave crab gear soaking while participating in a salmon opening or prosecuting a long net trip. The 750-pot limit is fairly high when compared to other regions but captures the 635-pot average for the fleet from 2012 to 2021 and represents a reasonable compromise from our perspective. It is difficult for most vessels, particularly those engaged in multiple fisheries to monitor and consistently haul more than 750 pots and the limit intended to address issues with lost gear referenced above and congestion in inner bays expanded on below.

Under the current management structure for Dungeness crab there are no limits on the number of pots a vessel can deploy. In recent years, the Kodiak District has seen significant increase in effort and harvest as a result of strong harvests in 2019 and 2020 and good harvest and an exceptional price in 2021. There were 17,720 pots registered in 2021 in the Kodiak District by vessels that made landings. This figure is well above the 2012-2021 average of 7,170 registered pots and illustrates the magnitude of the issue.

The proposal seeks to address a significant problem with congestion of pots in bays which negatively impacts other fishermen. With an average of 61% of the Dungeness harvest occurring in June, July and August and an average of 68% of the harvest coming from three statistical areas as noted above, bays can become overwrought with crab pots and impact both the safety and prosecution of a fishery by others.

For example, in Moser Bay in 2020 and 2021, crab pots moved during storms and ended up tangled in setnets, leading to lost fishing time. The setnet tender increased run time to fish camps to avoid crab pots and when pots could not be avoided lost significant time untangling the pots. The seafloor near Lazy Bay bound for grounds near A Tak beach has to navigate through hundreds of pots which are hard to see when the weather is rough, the worst time to get in the water. The barge which delivers provisions to the A Tak processing plant and leaves with processed fish not fed fishermen that it could not get through the pots and asked fishermen to move them or they would have no choice but run them over, resulting in lost pots.

Jeff fishermen entering Ugak Bay and looking for a place to anchor up for the night have had difficulty finding a place to drop the anchor in between pots. The proposal reflects the changing nature of fishery with pots so that it is difficult to navigate a boat through them.

While the pot limit will not address all the identified issues, it will help and is consistent with the management of all other Dungeness fisheries. In Southeast Alaska the Dungeness fishery is managed with limited entry permits and tiered pot limits. There are 49 permits with a 300-pot limit, 43 permits with a 225-pot limit, 83 permits with a 150-pot limit and 98 permits with a 75-pot limit. In Washington there are permits for 500-pot limits and 300-pot limits and in Oregon there are three tiers of 200, 300 or 500 pots. Pot limits coupled with regular gear haul requirements will help mitigate impacts on the crab and other gear types fishing in the same area.

AMCC notes the challenges with enforcing the pot limits and supports issuance of buoy tags to aid in enforcement. While many restrictions are difficult to enforce, most fishermen operate the fishing business in full compliance with all regulations and abide by the regulations regardless of enforcement challenges.

AMCC supports **PROPOSAL 268** to adopt a new Tanner crab harvest strategy to set annual harvest limits in the Kodiak, Chignik, and South Peninsula districts. We applaud the considerable time and resources area crab biologists dedicated to update the harvest strategy under the current environment.

The proposed Tanner crab management plan is more reflective of stock status and provides increased opportunity to target smaller harvest. The plan updates long-term abundance thresholds used to open the fishery and implements a ramped harvest control rule that incorporates both mature male and mature female abundance when determining maximum legal male exploitation rates. In terms of management, the plan estimates the 400,000-pound district minimum GHL and estimates the requirement that at least 2 sections be open for a fishery to occur which were established when the status of the stocks was significantly higher than we have seen in decades. The proposed harvest strategy is tailored to exploitation rates in the past which has resulted in a successful fishery over the last 20 years.

AMCC supports **PROPOSAL 270**, to amend pot limits for Kodiak District Tanner crab. The winter Tanner crab fishery is somewhat unique in that it was designed with input from the community-based fleet. Fishermen wanted managers to factor in safety, equity, and conservation into how the fishery operates. If the daily weather update for the fishing grounds includes a gale warning, managers delay the fishery for 24 hours. Doing so provides for greater safety and equity in the fishery.

The fishery was also designed with input by fishermen to have a minimal impact on Tanner crab stocks. Crab pots can only be hauled from 8:00 in the morning until 6:00 at night, thereby reducing the mortality of discarded crab—those that are undersize or female. Minimizing the number of times a pot is hauled in a 24 hour reduces stress on the crab when handled on deck and the daylight only requirement limits the exposure of discarded crab to colder temperatures at night. Vessels are also limited to 20 pots depending on the total allowable catch of crab, which serves to both minimize the impact of the gear on the crab and even the pay going fed among vessels.

The current structure of the fishery is working well and the fleet can easily catch the quota with 20 pots fishing day night hours. The fleet has been conservatively managed and participating fishermen report catch data to area managers who carefully monitor the fleet to allow for maximum harvest. The fishery is very important to community-based fishermen and nearby vessels, captains and crew reside in Gulf of Alaska communities.

When the Tanner crab biomass improves and GHL increases, so does fleet effort. From 2003 to 2021, between 31 and 80 vessels participated in the fishery. The number of participating vessels increases and decreases with the GHL and this trend will no doubt continue as the stock status improves.



In 2022, 87 vessels registered and with 179 limited entry permits available, one can anticipate increased effort in 2023 based on the success of the fleet in 2022 with record high prices and good CPUE.

The proposal will maintain the 20 pot limit up to 2,500,000 pounds and increase by 10 pots if harvest is between 2,500,000 to 5,000,000. There is strong interest among the Kodiak-based fleet to maintain the small limit beyond 2,500,000 pounds. Discussions to date have expressed interest in maintaining the 20 pot limit regardless of the GHL or increasing to 25 or 30 pots if the GHL reaches 5,000,000.

With the understanding that vessels and pots will increase with increased GHL, why increase the number of pots vessels can use at the same time? If the GHL increases the fleet can still catch the quota with 20 pots. A simultaneous increase in vessels and gear will compress the season and increase crab mortality with increased handling.

It is important to maintain the integrity of the small boat fishery that fishermen and managers have worked hard to maintain. The Kodiak fleet is working to maintain a fishery for years ahead and have proven they can catch the crab with the current pot limit. Larger vessels do have the benefit of carrying larger, heavier pots which usually fish better than smaller pots used by smaller vessels. In short, the fishery is working well under the current limits and AMCC supports proposal 270 and encourages the Board of Fish to consider maintaining the 20 pot limit beyond 2,500,000.

Thank you for the opportunity to comment on the proposals under consideration by the Board of Fish.

Sincerely,

Theresa Peterson

Fisheries Policy Director

Alaska Marine Conservation Council



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February 16, 2022

Dear Board of Fish,

I don't not support prop 283, please keep native and subsistence based people on mind. We live off these fish. If they die my family does too

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.

Thomas James

Klawock  
99925



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March 07, 2022

Dear Board of Fish,

The king runs have been very poor due to the amount of commercial netting. This needs to be reduced in order to save the king population.

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.

Thomas Satterlee

Big lake  
32654





February 19, 2022

Dear Board of Fish,

I first fished for Alaskan salmon as a Coastguardsman assigned to a remote Loran Station in the mid-'70s. That experience has had me returning regularly. When my children were old enough I began bringing them, along with other family members to the Kenai - using guides, charter-air services, vehicle rentals, restaurants, paying licensing fees, and utilizing local lodging on an almost annual basis - all contributing the the economy of Alaskan Kenai residents, and to the benefit of the State in general.. Even with the pandemic, the family missed only one year and six of us returned again last summer. All competent economic data shows that a single Kenai King, as with most species fished both for sport and commercial use, is far more valuable as a sportfish than simply being taken commercially - more so if the species is simply a by-catch. We have watched the "death-spiral" of breeding success over the years of this magnificent species - to the point that they are fundamentally unfishable today by responsible anglers! The host of special regulations, bait restrictions, catch and release orders and the like over the past decade make the risk to the species eminently clear. The fact that AF&G has similar stringent restrictions in place for the upcoming season simply highlights in what dire condition the Kenai River kings stock is in.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283, would effectively allow commercial harvesting of the signature kings when AF&G's data clearly clearly reflects that the lower escapement goals are not being realized. The argument that catch-and-release is a reasonable surrogate for closed fishing is a charade given the sound scientific data demonstrating that such fish have an abysmally low survival rate.

The Board's decision in 2020 to protect the Late Run Kenai River king salmon was well taken but needs to be given an adequate period to succeed. Proposal 283 is a wholesale abandonment of that effort, to the advantage of a small group and the detriment of the clear need to conserve a species that has value to a wider range of Alaskans and non-Alaskans alike. From an economic standpoint alone, the OEG should oppose Proposal 283, and asisst in laying a solid base from which to preserve and restore the Kenai River king salmon stocks. Enactment of 283, would fly in the face of all sound species management knowledge, and, I fear, be the death knell of the Kenai River kings. I urge you not to be a willing party to such action.. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the Kenai kings.

Thomas Watts-FitzGerald

Coral Gables  
33134-4765



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February 16, 2022

Dear Board of Fish,

I primarily fish the Kenai River and Cook inlet for salmon and halibut. I'm devastated at the recent historic decline of the mighty king salmon in the Kenai, and urge you to do everything within your power to help reverse this trend. It's not too late - please!

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 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.

Thomas Yukman

SOLDOTNA  
99669



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February 16, 2022

Dear Board of Fish,

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.

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?

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.

Tim Anderson  
Highland  
84003





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March 11, 2022

Dear Board of Fish,

As a resident of Anchorage for 47 years and avid outdoorsman, including annual fishing trips to the Kenai River, I believe this new policy would further compromise King Salmon fishing there.

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.

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.

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.

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Tim Ranger

Anchorage  
99507



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February 15, 2022

Dear Board of Fish,

Avid fisherman in both river and salt. Have lived in Alaska for about 13 years total. We have seen kings basically disappear from most streams and something needs to be done to preserve the king run for years to come. Now is the time to stop all king fishing to allow the fishery to rebound.

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.

Timothy Frantz

Wasilla  
99654





Submitted By  
Timothy M. Chae Murphy  
Submitted On  
2/1/2022 5:40:20 AM  
Affidavit on

To the State of Alaska Board of Fisheries;

This comment is provided in regard to Proposal 282 regarding interception of Chignik bound sockeye in the Shumagin Islands and Dog Islands and sections of the South Alaska Peninsula.

Since its release to the public, and first exposure to the State Board of Fisheries showing the increased numbers of Chignik Bound sockeye intercepted in Area M, the WASSIP genetic study appeared to fall on deaf ears with the management and regulatory personnel of the State of Alaska since 2013.

In 2013, there were 0 proposals passed to effect meaningful regulatory change to allow the fishers in Chignik access to the resource that was and is clearly being intercepted in the South Alaska Peninsula.

In 2016, 1 somewhat ineffectual proposal was passed, proposal 186 which would place a "cap" on sockeye harvested in the Dog Islands and section, the proposal asked for a much lower "cap" number than what was passed as compromise with Area M stakeholders, but managers in Area M were simply unable to manage to the intent of the proposal the 1st year it was made law.

This "cap" is far too high, and in comparison, management in Area M's unwillingness to manage to the intent to limit interception in the area versus the North Shore Management Plan in the Kodiak salmon fishery allows a fraction of interception of Cook Inlet bound sockeye as we as ensuring short notice closures to prevent exceeding that cap.

In 2019, The fact that there was fishing gear in the water in June in the South Alaska Peninsula salmon fishery virtually 100% of the time was brought to light, and a proposal was passed to implement very short closures, so there would be small windows that Chignik bound sockeye would be able to pass. 2020 was yet another disaster for Chignik sockeye with NO commercial fishery.

While catches of sockeye in the South Alaska Peninsula were down in 2020, the Bristol Bay sockeye harvest was record setting, if the bulk of the sockeye intercepted in the Shumagin Islands were Bristol Bay bound sockeye the Area M sockeye harvest should've remained close to average.

The amount of boats in the South Alaska Peninsula has increased and with that the ability to intercept sockeye has created a condition where very few fish get by as seen by the lack of a sockeye fishery in 2018 and 2020 in Chignik as we as very low sockeye escapements from 2018 to 2021.

Passage of Proposal 282 is a small step in the right direction to return much needed resource to Chignik fishermen.

Timothy Murphy



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February 16, 2022

Dear Board of Fish,

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.

Tingey Melvin

Centerville  
84014



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February 15, 2022

Dear Board of Fish,

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.

TJ Nickel

Anchorage  
99504



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March 07, 2022

Dear Board of Fish,

Let the Kings reach their spawning grounds, give the local guides and tourist anglers the chance at catching the Kings

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.

Todd Hall

Aurora  
80015



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February 18, 2022

Dear Board of Fish,

Been fishing the Kenai with family and friends since mid seventies have seen many changes some good like horse power reduction, more bad erosion, to many guides with to much pressure on kings, to much set netting and commercial in Cook Inlet. Current plan for restrictions for all users is good. Also my family has property on the Kenai river ( lower) since 1984.

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.

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.

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.

Todd Halverson

Anchorage  
99515





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February 15, 2022

Dear Board of Fish,

Are you kidding me? This is such old news...and I'm 61 years old! Time for these people to grow up.

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.

Todd LaFlamme



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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.

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Tom Key

Casper  
82609



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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 F sherman

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907-830-5150  
Email  
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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 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 medical 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 of fisheries in ongoing 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 medical 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





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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  
Aff at on

Phone  
9072527818  
Ema  
[mracksonteaches@yahoo.com](mailto:mracksonteaches@yahoo.com)  
Address  
52500 Leah Street  
N k sk , A aska 99611

Regarding board generated proposa #283, I am a n favor of th s type of regu atory change.

After a decade of be ng a set net commerc a f sherman, I have watched w th sadness and frustrat on as the Kena R ver s over escaped year after year wh e ADFG has our nets out of the water. I support th s proposa because t w a ow for harvest ng of sockeye, a food that feeds the wor d, and better sc ent f c management of the Kena R ver. Pass ng th s proposa w not e m nate sportf sh ng or d p net persona use opportun t es, t w n fact a ow for an equ tab e harvest by ALL USERS, wh ch s n State of A aska Const tut on (Art c e VIII).

Thank you for propos ng ad ook ng at a ternat es the the management p an we are current y us ng.



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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  
Aff at on



PC558  
1 of 1

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 Kena and Kas of Rivers with set g net gear once the SEG of 13,500 Kena River late-run king salmon has been met.

2021, and previous years, experienced sockeye salmon returns to both the Kena and Kas of Rivers that substantially exceeded each river sockeye escapement management objectives. According to ADFG fish count website, the Kena River was to be managed to an annual 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 Kas of River was 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 Kas of 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 Kena River Late Run King Salmon Management Plan was modified. The UCI drift feet 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 Kena and Kas of Rivers.

Proposal 283 would provide limited opportunity to target sockeye within the ESSN when there is a harvestable surplus, while reducing the incidental hook 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



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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



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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  
Wace W. Henderer  
Submitted On  
3/10/2022 1:10:00 PM  
Affiliation  
City Council Member

Chairwoman Carson- Van Dort, and members of the Board;

My name is Wace W. Henderer. I am a resident and city council member of Chignik Alaska. I support Proposal 282. I feel this 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 at a hard 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 council members have approved a motion giving me permission to make this statement

Sincerely,

Wace W. Henderer





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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



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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



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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



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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**

<b>*Address</b> 860 Willow Dr. <b>Home Phone</b> (907)399-4256	<b>*City, State</b> Homer, Alaska <b>*Work Phone</b>	<b>*ZIP Code</b> 99603 <b>*Email</b> whum@acsalaska.net
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*\*Indicates a required field*



ALASKA BOARD OF FISHERIES

Regulation Proposal Form 2020-2021

Proposals must be received ~~Friday, April 10, 2020~~ **Friday, April 24, 2020**. The proposal deadline 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>



PC568  
2 of 7

**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 400 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



## 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			*
1995	1		*
1996	1		*
1997–2015	Closed by regulation		

\* 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



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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



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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.

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William Cohen

Soldotna  
99669



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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





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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.

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WILLIAM HESTER

PALMER  
99645



*William Jones*

Sincerely,

Thank you.

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.

Re: Support for ACR 7 {Proposal 282}

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

January 21, 2022

William Jones  
111 Airport Road  
Chignik, Alaska 99564





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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



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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



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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 now 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



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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.

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William McComas

La Conner  
98257





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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



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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.

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William Minnette

Eagle river  
99577



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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





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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.

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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?

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William Stroess

STERLING  
99672





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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 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. However, constant over harvest by reporting sport fishers shows that half of the time, the GHL 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 GHL 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 GHL. Over the last eleven years of the fishery, carry over GHL from under-harvest would have occurred twice, in 2012 and 2015, as proposed. Every other year it has been managed to the GHL without over harvest.

This proposal should be adopted because it holds the commercial sector accountable to harvest only within their allocated GHL. 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 GHL 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,



Brett Wilbanks, Chairman  
ShrimpPros Association

