

February 5, 2024

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

Dear Board of Fisheries,

I'm a born and raised third generation Alaskan commercial fisherman. I grew up fishing the very tail end of many Alaskan fisheries—halibut, herring, cod, king crab, opilio, Bairdi. I will probably never get another chance to fish any of those again. No matter what other fisheries I've done, though, I always come back to seining or gill netting for salmon. Invested my life into it. Bought my own permit. Built a boat and a skiff. Invested lots of money into the state and the communities. If we get rid of the hatcheries, then there is a good chance that salmon will be unsustainable also. How can we keep the next generation going? Or this generation? Extremely low prices coupled with a huge drop in volume would be a disaster, with no actual proof that hatcheries harm anything. If nothing else, they must help, evidenced by record runs in the Bay and elsewhere. They are just being attacked by some radicals that want everything their way. I strongly suggest we stop them from trying to destroy our way of life. Thank you for your time.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level

may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) **Lack of Scientific Evidence:** Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) **Steady Increase in Wild Salmon Returns:** Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

Rick Corazza



Homer/Valdez, Alaska

February 12, 2024

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

Dear Board of Fisheries,

My family has been commercial fishing in Alaska since 1939 and seining for salmon in Prince William Sound since 1985. The local fishermen of PWS started the hatchery program there because many of their salmon streams were lost due to the earthquake and the sinking of the land in the Sound. In the nearly 40 years that we have seined in PWS and been part of the hatchery program we have watched its success, from helping to protect wild stocks to increasing the livelihood of everyone involved with hatcheries. Fishermen and their crews, tenders and their crews, processors and all the workers they employ, cities all over PWS and including Seward, Anchorage, Homer and even Southeast people have benefited from the hatchery programs. Several of the largest wild salmon fishery years have coincided with the largest hatchery stock years which is wonderful, and during smaller years the hatchery fish have helped to take pressure off the wild salmon, in both cases it is a win-win for fish and for people. I fully support the hatchery programs in Alaska and am thankful for the good science and stocking efforts and hard working people who participate in all aspects of the program. Many sportsmen do not know it but 72% of the price of every silver caught in PWS by sportsmen is paid for by the commercial fishermen through the hatchery project and cost recovery. It truly benefits everyone!

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

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I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Sonja Corazza



Homer, AK

Submitted by: Aaron Corbin

Community of Residence: Hendersonville, NC

Trawler bycatch is unacceptable. In no other fishery would the amount of waste be acceptable. To see cultures that have subsisted for thousands of years be forced to stop fishing and have fish flown in from other areas is just disgusting to watch.

As a former commercial fisherman and having been raised in Alaska I see no reason that fisheries management should allow this behavior to continue.

Zero bycatch. That's how trawling should be managed. When I return home and catch salmon or halibut if I were to waste some of those fish I would face a fine for doing so yet trawlers get away with it day in and day out.



John Wood, Chair [REDACTED]
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

February 4, 2024

Re: Upper Cook Inlet Proposals

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region. As you deliberate, we respectfully ask you to consider our comments:

Proposal 43 - OPPOSE

We oppose this proposal to amend the *Cook Inlet Salmon Enhancement Allocation Plan* to reduce hatchery production to 25% of the year 2000.

Hatchery Regional Planning Teams members include representatives from Alaska Department of Fish and Game and hold strong backgrounds in the science behind hatchery production, as well as a thorough understanding of local ecologies and regional fisheries. Their open public meetings include scientific reports and presentations based on the most current research available. We support this public framework and would like to see recommendations related to hatchery management to be made through RPTs who have vetted the matters.

Thank you for your time and consideration of our comments. We greatly appreciate the attention to the issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our comments, please don't hesitate to contact me.

Sincerely,

Jess Rude
Executive Director

Submitted by: Andrew Couch
Community of Residence: Palmer, Alaska

People know me as Andy Couch. I've guided salmon fishing trips, launching on day trips in the Mat-Su Valley for the past 40 years, including at Little Susitna River, Deshka River, and Unit 2 streams of the Susitna Drainage between Deshka Landing and Montana Creek. I also write a weekly fishing column for the Frontiersman Newspaper, primarily during summer months. My concern is the rapidly declining sport fishing salmon harvest opportunities within Northern Cook Inlet -- including the Susitna River drainage and Little Susitna River. The two primary salmon species historically harvested from this area by the sport fishery have been coho salmon and king salmon.

At the 2020 Board of Fisheries meeting the Board adopted changes, in August, designed to pass additional salmon through the Central Inlet drift gill net fishery to provide for Northern Cook Inlet salmon escapement needs and also to [provide reasonable salmon harvest opportunities for all Northern Cook Inlet user groups. I believe, because of old gear regulations, in place since the 1970s or earlier, that most of any additional harvestable surplus coho salmon have been taken in the Northern District set net fishery, thereby denying sport, guided sport, and other inriver user groups even the reasonable level of harvest that had been experienced in the past. Since Northern District commercial harvests often occur a week or more before salmon abundances are monitored by upstream weirs, several inseason salmon escapement goal shortages, that have occurred since the 2020 Board of Fisheries Meeting, have reduced sport fishing effort, harvest opportunities, and seasonal harvests considerable more compared to the Northern District commercial fishery. Even when goal levels are later achieved during a season, the much more conservative and less efficient sport fishery harvests considerably less salmon when only a minimal number of salmon above the escapement range threshold is allowed to migrate inriver. Northern Cook Inlet is so silty from the drainage of large glacial rivers that few salmon are taken in Northern District saltwater sport fisheries -- further exacerbating the issue.

I believe that more conservative commercial stipulations within the Northern District Salmon Management Plan and the Northern District King Salmon Management would provide a better sharing of the Northern Cook Inlet harvestable salmon surplus, throughout the entire run(s), and should also greatly reduce the amount of inseason restrictions, closures, and the threat of salmon spawning escapement shortages. Therefore, in order of priority, I support Northern District Salmon Management Plan Proposals 212, 214, 210, and 213 -- and the concepts they put forward. These proposal ideas could likely help restore some Northern Cook Inlet sport harvest opportunities, participation, and economic value within the first year of use.

Northern Cook Inlet king salmon stocks have been in decline since 2007, with 2023 having some of the lowest king salmon spawning escapements on record. Recent yield / harvestable surplus fish available during the past 5 years should easily qualify king salmon stocks, throughout the entire Susitna River drainage, as Stocks of Yield Concern. The

Little Susitna River king salmon stock should also have such a designation. Action I would suggest the Board should take at this meeting to address Kenai River and Northern District king salmon stock statuses. Support adoption of proposal 43 as a long overdue precautionary measure -- from an allocation standpoint nearly all directed sport, commercial, and personal use harvest of wild Upper Cook Inlet king salmon on has already been eliminated (and especially during the past two seasons). It is long past time to more equally address the issue of declining ocean production (a browning scientific community concern is that this decline may be partially caused by competition with hatchery pink salmon). I support Northern District King Salmon Management Plan proposals and concepts in order of priority: 207, 208, 210, 205, 206.

Consider a more reasonable sharing of salmon harvest opportunities with additional days of dip netting opportunity in Northern Cook Inlet. If Northern District commercial opportunity fished a more conservative number of nets per permit, the lower Susitna personal use fishery could have more than 6 or 7 days of harvest opportunity in an entire season. I therefore support, in order of priority Lower Susitna personal use proposals 228 (housekeeping) 229, 231, 230, 213.

Thank you for considering my thoughts, and always feel welcome to ask me questions about these Northern Cook Inlet salmon harvest opportunities that I would like to see maintained for additional generations of Alaskans to enjoy.

Proposal 1: Support	Proposal 43: Support	Proposal 137: Support	Proposal 202: Support
Proposal 205: Support	Proposal 206: Support	Proposal 207: Support	Proposal 208: Support
Proposal 210: Support	Proposal 212: Support	Proposal 213: Support	Proposal 214: Support
Proposal 228: Support	Proposal 229: Support	Proposal 230: Support	Proposal 231: Support

I wanted to add my personal support for proposal 238. The loss of large king salmon as a proportion of the Little Susitna River king salmon spawning escapement goal is dramatic. I worked for ADF&G as a fisheries technician on the Little Susitna River for a couple summers while I was attending college. I remember doing creel census work one year where the average Little Susitna king salmon caught by the sport fishery was between 29 and 30 pounds. Contrast that to 2023 where most of the king salmon caught from my boat were less than 20 inches / less than 1 pound. I only had one king salmon in 2023 caught from my guide boat that I would estimate as over 30 lbs -- all fish were required to be released without removing them from the water.

ADF&G has a large king salmon goal at Kasilof River using Crooked Creek Weir technology. It is not rocket science and already being done here in Cook Inlet with a weir project. This should include an amendment for Deshka River as well.

Proposal 238: Support

Submitted by: Carl Coulliette
Community of Residence: Sterling, AK

Proposal #167

I've been fishing and guiding professionally on that section of river for over 20 years now. I 100% support this proposal. It is imperative that action is taken in favor of this proposal. I am deeply concerned about the longevity of the silver salmon population. Further more, the amount of pressure that this section of river is experiencing the past few years is detrimental to this particular fishery. It is my opinion that this entire section in said proposal should be thoroughly and thoughtfully reviewed. I am in support of making it fly fishy only and stricter catch and release policies should be implemented.

Proposal 167: Support

11-6-2023

Alaska Department of Fish and Game
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Reference: 2023-2024 Board of Fisheries meeting

Subject: **Proposal 200 (enclosed)** seeking to close the Kasilof June 15-24 personal use gill net fishery.

To: Board members,

The author of this proposal sums up his recommendation by stating: **This is not equitable for all other user groups and has a negative impact on the declining King Salmon stocks**". The board should strongly reject this and similar proposals for their divisive language, lack of credible evidence and non-adherence to the management principles governing sustainability yield. Kenai king salmon stocks are on the decline and everyone is aware of the combative and competitive battle between the sports and commercial fishery groups. But sport fishing guides appear to be frustrated with targeted closures and now seek to invoke **diversity and equity as a non-scientific argument** to close down an Alaskans only-family based fishery. Personal use fisheries are non-commercial and should not become a political target when not supported by ADF&G guidelines ensuring that stocks are harvested at sustainable levels.

Per ADF&G's historical records, families have harvested salmon as a food source through subsistence and personal use regulations since 1982 when river guides were few and commercial fishermen were the dominant players. But, just because sport fishing and commercial guide numbers have increased and placed more demand on salmon stocks doesn't change the original premise on how or why personal use guidelines were developed. Alaskan families were to be allowed access to traditional salmon stocks to meet a traditional source of food. The Kasilof River personal gillnet fishery is implemented with nets that are spaced 100' apart, are confined to 1 mile N and S of the river mouth and is open for only 10 days prior to the opening of the Kasilof River dip net periods. It's mostly a family affair spread out over 2 miles of beach and avoids the combative crowds so prevalent during the dip net periods.

In 1996, Cook Inlet was closed to subsistence fishing and replaced with the current Kenai/Kasilof dip netting/set gillnet regulations under personal use guidelines. New regulations dictate "in-season management" allowing the fisheries to be closed if projected minimum sockeye or king salmon escapement goals will not be met. Nothing in proposal 200 supports any argument that the set gillnet fishery has been detrimental to the sustainable yield of either species or more specifically affects king salmon returning to both the Kasilof and Kenai rivers. Except for the 23 season, when the fishery was closed, gillnets only accounted for about 12% of the total personal use harvest each year on the Kasilof. King salmon numbers were reported as minimal with the majority targeting and returning to the Kasilof River and not the Kenai River. In addition, as outlined below, sockeye salmon escapement in the Kasilof

River was significantly over its escapement goals with more than 900,000 fish for both the 22 and 23 seasons.

Date 2023	Count 2023	Cumulative 2023	Cumulative 2022	Cumulative 2021	Cumulative 2020
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Date 2023	Count 2023	Cumulative 2023	Cumulative 2022	Cumulative 2021	Cumulative 2020	Cumulative 2019	Notes for 2023
Aug-27	2,358	932,896	971,604	521,859	545,654	378,416	North Bank 1,398; South Bank 960; Final Count
Aug-26	5,052	930,538	971,604	521,859	545,654	378,416	North Bank 3,018; South Bank 2,034

Chinook Salmon Harvest * numbers do not distinguish between kings returning to the Kasilof River as either hatchery, wild or incidental Kenai Kings				
YEAR	Fish Creek Dip Net	Kasilof River Gillnet	Kasilof River Dip Net	Kenai River Dip Net
2022	0	19	21	13
2021	3	94	9	50

I don't recall any language in the constitution or ADF&G regulations determining opening and closing access to salmon stocks based on equity, but considerable language on research and in season management to ensure stocks are harvested at sustainable levels. Set gillnet hours were reduced in 2021 and 2022 and completely closed in 2023 denying Alaskan families access to a traditional food source since the early 80's. It was strictly political and never justified under sustainable yield guidelines. The idea that these families should discard their gill net gear, purchase dip nets and stand shoulder to shoulder with other dip netters may not be a viable alternative. Families with elders and children who normally assist in hauling in nets and removing fish from the nets may not transition or participate easily into dip net fishery methods.

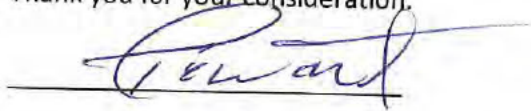
Social justice solutions are not practical for "in season management decisions" and definitely not defined under sustainable yield guidelines. If the rationale outlined under proposal 200 was somehow acceptable as an alternative to existing sustainable guidelines, wouldn't it also be consistently equitable

to suggest commercial guides/set netters relocate their assets to Bristol Bay to reduce over harvesting of king salmon stocks? Hardly, as it is well documented that under-harvesting is as detrimental to sustainable yields as over-harvesting salmon stocks. **Professional management decisions should not be encumbered by equity or political decision when falling outside sustainable yield guidelines.**

No justifications for the 2023 closure were ever presented by ADF&G, but it's obvious, the 2023 closure was based solely only on political pressure from the Kenai River guides and its affiliates. Forty years of traditional access by Alaska families for a necessary food source should not have been interrupted by political whims. Furthermore, and just as significant, equity based closures will only encouraged more divisiveness between the user groups.

The numbers of Kenai River king salmon harvested by the Kasilof set gillnet fishery has had a minimal and inconsequential affect on escapement goals. Sockeye salmon escapement in the Kasilof River has exceeded its escapement goals for at least the last 5 years (see table above), with escapements in 2022 & 2023 so high that many are now concerned over impacts to future returns in this watershed. **I strongly urge the fisheries board to keep the Kasilof River personal use set gillnet fishing periods of June 15-24 in place as there is no firm scientific-evidence the minimal king salmon harvest in this fishery is having any negative impact on either Kenai or Kasilof king salmon returns into the rivers.**

Thank you for your consideration.



Terry Cowart *



* 55 years Alaska resident, 3 years commercial fisherman
*40 years personal use set gillnet fishing

Referenced:

PROPOSAL 200 5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan. Close the Kasilof personal use gillnet fishery when Kenai or Kasilof Rivers sport fisheries are closed as follows: If the Kenai River is closed to the taking of King salmon or Kasilof River is closed to harvest of Native King Salmon on June 14 the personal use gill net fishery shall also be closed June 15- June25
What is the issue you would like the board to address and why? Closure of personal use gill net fishery June 15-25. When Kenai River is closed to taking of King Salmon or Kasilof River is closed to harvest of native King Salmon, the personal use gill net fishery on east side beach shall be closed. There is ample opportunity to obtain personal use fish using a dipnet in the Kasilof area. If not, that dip net fishery could be expanded. This would allow the department to avoid King salmon harvest in personal use fishery while still providing opportunity with dipnets. This gill net fishery was the last fishery to be implemented in Cook Inlet around 1998, yet is the only one now allowed to harvest King Salmon. **This is not equitable for all other user groups and has a negative impact on the declining King Salmon stocks in all of Cook Inlet. PROPOSED BY: Joe Hanes (EF-F23-053)**



Changing from set nets to dip nets may also cause concerns over safety, close quarters & hygiene.



Submitted by: Alan Crookston
Tide Chaser Fishery

Community of Residence: Kenai, AK

Intro: Hello. My name is Alan Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Summary: Time has now shown that the Optimum Escapement Goal (OEG) set in the 2020 BOF meeting was indeed set too high, and this number is showing a positive correlation that it is unattainable. Consequently, this unattainable OEG has placed the conservation burden primarily on the shoulders of the ESSN, which has led to multiple economic disasters for the entire ESSN. Nearly every year since the 2020 OEG was set, it has been unachieved, and consequently led to economic disasters because the ESSN has essentially not been able to harvest any salmon. Our gear has been ready to go, and the crews hired and trained, only to sit on the beach year after year with no means to support family and crew.

If this OEG is not changed back to a realistic number, like a range that has worked for over 100 years, as shown as part of this historic fishery, then this ESSN family fishery will become extinct! Small businesses will collapse, and families will be starved into another sector. This fishery has successfully existed in this community for 140 plus years, with successful administrative leadership and management plans in place. There is substantial evidence showing that this has not been the case these past five years. The biological fishery is not what is broken here; but rather it is the management plan that needs some adjustments.

Furthermore, the pairings set forth in the 2020 BOF meeting have proven to be discriminatory to the ESSN. The ESSN has had essentially ZERO opportunities to harvest the abundant sockeye, while all of the other user groups have been liberalized to harvest sockeye. We are simply asking for equity with the pairings. I believe that there is an opportunity for the ESSN to harvest sockeye based on the Large King SEG (13,500 - 27,000); This is a number that can save the ESSN and still protect the Kings.

Proposals Commenting on:

I strongly oppose proposals: 90, 106, 112, 141 and 150.

I am in support of proposals: 101, 112, 141, 150, 153, 154, 156, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 193, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 102: Support
Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support	Proposal 112: Oppose
Proposal 114: Support	Proposal 116: Support	Proposal 117: Support	Proposal 119: Support
Proposal 120: Support	Proposal 128: Support	Proposal 130: Support	Proposal 133: Support
Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Support	Proposal 150: Oppose
Proposal 151: Support	Proposal 152: Support	Proposal 160: Support	Proposal 161: Support
Proposal 163: Support	Proposal 164: Support	Proposal 173: Support	Proposal 176: Support
Proposal 177: Support	Proposal 178: Support	Proposal 179: Support	Proposal 180: Support
Proposal 181: Support	Proposal 185: Support	Proposal 186: Support	Proposal 189: Support
Proposal 190: Support	Proposal 195: Support	Proposal 196: Support	Proposal 197: Support
Proposal 198: Support	Proposal 199: Support	Proposal 200: Support	Proposal 211: Support
Proposal 215: Support			

Intro: Hello. My name is Alan Ted Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Please

I strongly oppose proposals 90 and 106.

I strongly support proposal 110. Proposal 110 will catch sockeye effectively, save the ESSN fishery, and it will not catch enough Kings to matter. This proposal will work, this proposal came with two years of planning and was put together with input and collaboration of the local ADFG area biologists.

Either way, we need to be able to catch sockeye close to shore during times of abundant sockeye. Please consider adjusting the plan to save this historic set net fishery.

Thank you for your consideration about this serious matter.

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support	Proposal 178: Support
Proposal 179: Support	Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose
Proposal 185: Support	Proposal 186: Support	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose
Proposal 195: Support	Proposal 196: Support	Proposal 197: Support	Proposal 198: Support
Proposal 199: Support	Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose
Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose
Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose
Proposal 215: Support	Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose
Proposal 232: Oppose			

Submitted by: Luke Crookston
Crookston Capitol

Community of Residence: Kenai, AK

Hello. I am Luke Crookston, I am a 4th generation set netter. I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River.

Our fish site is going out of business. Please let us fish. Every other user group gets to harvest sockeye but the ESSN. You need to put language into the plan that will force the commissioner to let us fish when the reds are running, or he will find a way to not fish us.

Also, when the reds are running we catch a very small amount of kings, you are welcome to come to our fish site any day that we fish and you can see for yourself, with your own eyes, the number of Kings that we catch, it is very small. And in close along the shore we hardly ever catch Kings....please come and see for yourselves.

Also,the Kings number still do not look good, and we haven't been fishing for many years, so we cannot be the problem.

Please let us fish close to shore when the reds are thick, or we will go out of business this year.

Submitted by: Nina Crookston
Tide Chaser Fishery LLC

Community of Residence: Kenai, AK

Hello, I married into a ESSN family 18 years ago. My husband have invested hundreds of thousands of dollars into this community and fishery, and thousands and thousands of hours. We have always hired local help and shopped at local stores and used local services as part of our business.

We wanted the fish site to be a good experience for our boys and their friends, as well as feed the world with world class protein.

Unfortunately we have never had an return on our investment, and my boys have never worked more than a few days a year fishing - if at all. We are now to a point where we are having to sell of pieces of equipment just to pay bills. If things do not change then our doors will close. The problem has not been a lack of fish, we see the sockeye swimming in droves by our beach site day after day, and week after week, only to see them go to other user groups - or wasted in overescapent. The problem has been the management plan and the administration of it.

If provisions are not put in place to allow the ESSN to harvest sockey when the reds are thick, then numerous businesses like ours will fail. I ask you to please make the adjustments that need to be made to save this historic fishery.

I strongly oppose proposals: 90 and 106

Thank you.

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support

Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Support	Proposal 150: Oppose
Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
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Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
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Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
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Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

PC61

Submitted by: Paul Crookston
Tide Chaser Fishery

Community of Residence: Kenai, AK

Intro: Hello. My name is Paul Crookston. I am a 3rd generation set net fisherman, I fish in UCI off of Salamatof Beach. I am the 5th site north of the Kenai River. I have been a set net fisherman my entire life (40+ years).

Summary: Time has now shown that the Optimum Escapement Goal (OEG) set in the 2020 BOF meeting was indeed set too high, and this number is showing a positive correlation that it is unattainable. Furthermore, the amount of Kings that would be harvested between the SEG and the OEG would be statistically insignificant - meaning that it would have zero bearing on the future of the Kings.

The massive over escapement of the Reds (hundreds of thousands) is NOT statically insignificant, it is wasting precious resources and having catastrophic impact on our fishery.

Every large kicking king salmon that we have ever caught we let go. If we think that it will have a change to survive, which is often the case, then we let them go, and we have been doing this for 30 years. If we do not think that the King will survive, the we send it to the processors for harvest.

The ESSN does not target the Large King Salmon. We have historically fished for Sockeye in the Salt waters of UCI, that is 98% of our harvest.

However, there is another in-river commercial user group that fishes in the freshwater, they fish in the returning and spawning grounds of the King Salmon, and they specifically target the large Kings. They use specific gear, tackle and bate designed to kill these Kings, and they, circle and re-recycle and recycle through their feeding holes until they are successful. That is there target! And when the gear is changed to "floss for reds" that same methods and means will also kill a King. When a King is flossed (snagged in the mouth) it usually breaks the line. Are these snagged and flossed Kings salmon surviving? The data would indicate that they are not. You cannot floss for reds without killing kings at the same time.

I would encourage the Board to seriously consider what the implications of a in river targeted King Fishery has had on the King salmon, and I would ask the BOF to please adjust the plan protect with Kings with more equity.

Furthermore, the pairings set forth in the 2020 BOF meeting have proven to be discriminatory to the ESSN. The ESSN has had essentially ZERO opportunities to harvest the abundant sockeye, while all of the other user groups have been liberalized to harvest sockeye. We are simply asking for equity with the pairings. I believe that there is an opportunity for the ESSN to harvest sockeye based on the Large King SEG (13,500 - 27,000); This is a number that can save the ESSN and still protect the Kings.

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Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
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Submitted by: Ted Crookston

Community of Residence: Kenai

I have been a setnetter in Cook Inlet 58 years - all of my adult life. I DO understand the issues.

Myth: The ESSN commercial fishing has caused the decline of UCI king salmon.

Fact: Distressed ocean conditions have caused the decline of king salmon generally throughout Alaska and the Kenai River system has been especially impacted, even further, by the strategic targeted plucking of spawning kings out of their very in-river spawning holes with near military precision.

Myth: Closing the ESSN sockeye salmon fishery is warranted and will restore the king salmon stocks.

Fact: The number of large kings harvested in the ESSN is statistically insignificant in the overall health of the king salmon stock; so, while conservation measures are warranted the complete closure of the ESSN sockeye fishery and the associated staggering loss is unfair, unwarranted and unnecessary.

Myth: There is no way to adjust and manage an ESSN sockeye fishery in these times of low king abundance so as to allow for a sustainable ESSN sockeye fishery.

Fact: There ARE IN DEED options available to adjust and manage the ESSN sockeye fishery to substantially reduce the king harvest while still allowing for some sustaining level of sockeye harvest.

I urge this Board of Fisheries, with all the faculty of my being, to engage as an entire board — utilizing all the experience and perspective available from each and every single board member to assess the options, understand the issues, listen to and comprehend the very experienced stakeholders and managers, foster an open and solution-oriented dialog so as to find a way forward to allow for a sustaining level of ESSN sockeye salmon harvest while making all reasonable efforts to conserve the king salmon stock.

If a spirit of collaboration, compromise, fairness and sound reason will prevail then a responsible wise and sustainable plan can surely be identified to enhance the rebuilding of the the king salmon stocks while also maintaining the bedrock of the historic traditional setnet fishery with its attendant community, culture and economy.

This is your charge, your obligation, your responsibility and your duty.

I look forward to meeting with all of you at the BOF meetings in Anchorage.

Submitted by: Wesley Crookston
Crookston Capitol, LLC

Community of Residence: kenai, AK

Wesley Crookston.

I am a 4th generation set net fisherman. I have fished with my great grandfather as a young child. When we fished together the fishing was really good and people were happy. When my great-grandfather died, I fished with my grandpa...this fishing was definitely less, but it was still OK. My dad has now bought the fish site from my grandpa, so now I fish with my dad... sort of... we really don't fish much. Every year get all of our gear ready to go, only to see the run go by and we go home broke and upset.

This will be the last summer that I give up my summer to fish on salamatof beach. If I cannot make any money this year, then me and my friends will have to do other work during the summer. I think my mom and dad will have to go out of business. And I need money for things like Hockey and Wrestling!

I am writing the Board of Fish asking that they make changes to the king salmon management plan, so that we can fish again.

Thank you,

I STRONGLY oppose proposals: 90 & 106

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
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Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
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Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose
Proposal 215: Support	Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose
Proposal 232: Oppose			

February 12, 2024

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

Dear Board of Fisheries,

I'm part of the commercial and sport fisheries in Valdez, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Nicholas Crump

[REDACTED]

Valdez, AK

Submitted by: Madalynn Dabranca
Community of Residence: Kenai Alaska

Zero fishing for east side set net site 2023 all other user groups had higher limits and extended days and hours for personal use fisheries looks like totally un fair and discriminating against our East side fishery destroying our local economy the board of fisheries needs to be fair to all user groups let us fish 😞

Proposal 1: Oppose	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Oppose	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Support
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Support	Proposal 81: Support
Proposal 82: Oppose	Proposal 83: Oppose	Proposal 84: Oppose	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 89: Oppose
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 94: Oppose	Proposal 95: Oppose	Proposal 96: Oppose	Proposal 97: Support
Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 106: Oppose	Proposal 107: Oppose	Proposal 108: Oppose	Proposal 109: Oppose
Proposal 110: Oppose	Proposal 111: Oppose	Proposal 112: Oppose	Proposal 113: Oppose
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Proposal 222: Oppose	Proposal 223: Oppose	Proposal 224: Oppose	Proposal 225: Oppose

Proposal 226: Oppose	Proposal 227: Oppose	Proposal 228: Oppose	Proposal 229: Oppose
Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose	Proposal 233: Oppose
Proposal 234: Oppose	Proposal 235: Oppose	Proposal 236: Oppose	Proposal 237: Oppose
Proposal 238: Oppose	Proposal 239: Oppose	Proposal 240: Oppose	Proposal 241: Oppose
Proposal 242: Oppose	Proposal 243: Oppose	Proposal 244: Oppose	Proposal 245: Oppose
Proposal 246: Oppose	Proposal 247: Oppose	Proposal 248: Oppose	Proposal 249: Oppose
Proposal 250: Oppose	Proposal 251: Oppose	Proposal 252: Oppose	Proposal 253: Oppose
Proposal 254: Oppose	Proposal 255: Oppose		

PC66

Submitted by: Dugan Daniels
Community of Residence: Coffman Cove, Alaska

I am a commercial fisherman as well as an avid recreational and subsistence fishermen. I am also on the board of directors for SSRAA in southern Se Alaska. With the current continuing decline orlack of opportunity and access to traditional seasons and traditional areas during the winter and spring seasons as well as the attack by WFC organization from Washington as well as the allowed bycatch of the amendment 80 fleet and the continued loss of allocation every year from the Pacific Salmon Treaty as well as the fast growing “Commercial Charter industry continuing to take more of the allocation of salmon and in turn reducing the amount and days of opportunity to make a living I feel very strongly that hatchery fish are the only fish allowing us to continue to make a living the way not only myself but every other commercial fisherman in most areas are able to stay in business. I also know from a long history of fishing that if ADFG would get onboard with the program the wild stocks of concern could be assisted in making a recovery. This would not be an option if there is no hatcheries to make it possible to increase the survival rate and in turn increase the number of fish returning to river systems which not only benefits fisheries but it benefits wildlife that have since the beginning of time depended on salmon returns are part of there annual food supply. Ias a commercial fisherman I get paid the same price for a hatchery fish as I do a wild fish. I also know that any fish is better than no fish at all. For example I grew up on the southern Oregon coast and was involved in several projects to enhance returns of salmon and personally watched it work very well and was excited to see returns and rivers with fish in them again. Then after coming to Alaska almost 40 years ago someone decided in Oregon that wild fish couldn’t compete for food due to the hatchery fish (which were the same stock of fish that have always been returning to each of those rivers (stocks of salmon to each river they return to are usually slightly different from river to river and it’s always been kept that way with projects I have been involved with.) now Oregon has not much if any commercial or sport opportunities to catch a salmon as in most cases Oregon discontinued salmon hatchery production on rivers south of the Columbia river and the only reason the Columbia continues to get returns and salmon is because of the hatchery programs that must continue due to man building dams and continuing to all trawl boats to due whatever they need to be able to continue the destruction of the ocean and generate tons of bycatch that is basically thrown away and wasted. To stop hatchery production in Alaska with ever increasing numbers of the Commercial Charter Industry as well as do it yourself out of state tourist fishing the only way to ensure we have fish for generations to come is with hatcheries. On my commercial side of things we keep getting cuts in opportunity and number of chinook to catch as one of the very few gear groups that is allowed to directly fish chinook salmon as the commercial charter industry is allowed to catch as many as they want well over there allocated number and in turn it comes off the number of fish my gear group is allocated. I am a long time resident of Alaska and have seen what good hatcheries can do and benefit the people of this state as well as the continuing incredibly large population of tourism growth every year that the only way to ensure that we continue to have Salmon opportunities is with hatchery fish. The only other option would be to eliminate the amendment 80 fleet’s continuing destruction of the ocean with support of the federal government and unless it’s witnessed personally most of the population doesn’t know how bad it is for the fish of all species and the ocean sea floor. So in closing I urge you the people chosen to make the right decision to continue to allow hatchery

production and push the department of fish and game to work with hatcheries to come up with a solution to assist with specific needs of certain rivers with stocks of concern to increase their survival numbers and in turn increase the number of fish returning to those systems as well as the Simplest FACT that ANY SALMON is better than NO SALMON AT ALL as all people in Alaska one way or another need salmon to survive whether they realize it or not. So please continue to support hatcheries to ensure fish for generations to come.

Thank You, Dugan Daniels

PC67

Submitted by: Brian Davenport
Community of Residence: Anchorage, ak

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The anglers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

January 29, 2024

Dear Chairman Wood and Board of Fisheries members:

I came to Alaska from Florida with the military - once I discovered "Alaska fishing" I am home. I primarily fish, and dip, the Kenai but love to fish Cook Inlet too.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I also support guides that guide clients for personal use (dipnetting) MUST be Alaska residents. This should be included in the personal use section of the sportfishing regulations.

Sincerely,

Jennifer Davis
Anchorage, AK

To whom it may concern at the Board of Fisheries Management

Upper Cook Inlet, East Side Set Net fisheries

I had the pleasure, and some times pain, of joining my family on my parents set net site to fish for sockeye salmon in the 80's, 90's and some of the 2000's. This experience is the touchstone of my life and my many future successes.

The experience of working with family, and hired help, at such a challenging and demanding job has molded my work ethic, my patience, my skill sets, and my family values. I know it affected all the people who were lucky enough and determined enough to take part in the fishery.

There are very few careers, or jobs, that teach the personal strength, power and humility that commercial setnet fishing does. All fishing types really, but we are talking about east side set net fishing. I know many youths, you do too, now who will not drop their phone to take part in life or work. This profession, for the ones who choose to continue to take the risks this work requires, this work will create better humans, people who understand safety, weather, family, commitment, risk, compromise, determination, patience, overcoming fear, and enjoying success.

On the Frostad site we worked side by side, women, men, children, teens, and the locals we employed through the years. I learned from my step father, his uncle, mother, my grandfather for a while, and the neighboring crews, fathers, and mothers.

The thought that somehow these 100 families' livelihoods, history, and culture will be scarified for the benefit of a few others is a sacrilege, and the people who make up the State of Alaska should never agree to it. What brings people to live and thrive in Alaska? Determination, hard work, history and a respect for the culture of the locals, that is "who" Alaska is. Canceling the future of this fishery will not save the fish, we need to work together to harvest responsibly, through all fisheries. We need more aquaculture and to share the resource more fairly than we are now.

I adamantly disagree with any more disruption of this fishing area. The families who choose to continue fishing the east side set nets are an Alaskan treasure. They should be given a chance to continue to fish and thrive.

Lisa Davis

Submitted by: Peter DeLuca
Community of Residence: Kasilof, Alaska

The state management of Kenai River King salmon needs to go forward with similar restrictions as put in place during the 2023 Kenai River sport fishing/commercial set net fishery until these stocks of Kenai River Kings increases to normal levels. (What Ever the Cost) The Kenai River is now being exploited by guides dropping off Sockeye sport fisherman on the banks of the river to catch their limits without supervision. Sometimes leaving trash and toilet paper behind. This also needs to be addressed as it seems to be getting out of control. It seems like the guides are just fishing the Kenai River to death without showing any responsibility. The Kasilof River is not too far behind the problems that the Kenai River is experiencing. It's not too late to move forward with more restrictions concerning the Kasilof River.

- | | | | |
|-----------------------|-----------------------|-----------------------|-----------------------|
| Proposal 1: Support | Proposal 2: Oppose | Proposal 3: Oppose | Proposal 4: Support |
| Proposal 43: Support | Proposal 75: Oppose | Proposal 76: Oppose | Proposal 77: Oppose |
| Proposal 78: Oppose | Proposal 79: Support | Proposal 80: Support | Proposal 81: Oppose |
| Proposal 82: Oppose | Proposal 83: Support | Proposal 84: Support | Proposal 85: Support |
| Proposal 86: Support | Proposal 87: Support | Proposal 88: Support | Proposal 89: Support |
| Proposal 90: Oppose | Proposal 91: Support | Proposal 92: Oppose | Proposal 93: Oppose |
| Proposal 94: Oppose | Proposal 95: Support | Proposal 96: Oppose | Proposal 97: Support |
| Proposal 98: Support | Proposal 99: Oppose | Proposal 100: Oppose | Proposal 101: Oppose |
| Proposal 102: Support | Proposal 103: Support | Proposal 104: Oppose | Proposal 105: Oppose |
| Proposal 106: Oppose | Proposal 107: Support | Proposal 108: Oppose | Proposal 109: Support |
| Proposal 110: Oppose | Proposal 111: Oppose | Proposal 112: Oppose | Proposal 113: Oppose |
| Proposal 114: Support | Proposal 115: Support | Proposal 116: Support | Proposal 117: Support |
| Proposal 118: Support | Proposal 119: Oppose | Proposal 120: Support | Proposal 121: Support |
| Proposal 122: Support | Proposal 123: Support | Proposal 124: Support | Proposal 125: Support |
| Proposal 126: Support | Proposal 127: Support | Proposal 128: Oppose | Proposal 129: Oppose |
| Proposal 130: Oppose | Proposal 131: Oppose | Proposal 132: Support | Proposal 133: Oppose |
| Proposal 134: Support | Proposal 135: Support | Proposal 136: Support | Proposal 137: Support |
| Proposal 138: Oppose | Proposal 139: Oppose | Proposal 140: Oppose | Proposal 141: Support |
| Proposal 142: Support | Proposal 143: Oppose | Proposal 144: Support | Proposal 145: Support |
| Proposal 146: Support | Proposal 147: Support | Proposal 148: Support | Proposal 149: Support |
| Proposal 150: Oppose | Proposal 151: Support | Proposal 152: Support | Proposal 153: Oppose |
| Proposal 154: Oppose | Proposal 155: Oppose | Proposal 156: Oppose | Proposal 157: Oppose |
| Proposal 158: Oppose | Proposal 159: Oppose | Proposal 160: Support | Proposal 161: Support |
| Proposal 162: Oppose | Proposal 163: Support | Proposal 164: Support | Proposal 165: Oppose |
| Proposal 166: Support | Proposal 167: Support | Proposal 168: Oppose | Proposal 169: Support |
| Proposal 170: Oppose | Proposal 171: Oppose | Proposal 172: Oppose | Proposal 173: Support |
| Proposal 174: Oppose | Proposal 175: Support | Proposal 176: Support | Proposal 177: Support |
| Proposal 178: Oppose | Proposal 179: Support | Proposal 180: Support | Proposal 181: Support |
| Proposal 182: Support | Proposal 183: Support | Proposal 184: Support | Proposal 185: Support |
| Proposal 186: Support | Proposal 187: Support | Proposal 188: Support | Proposal 189: Support |
| Proposal 190: Support | Proposal 191: Support | Proposal 192: Support | Proposal 193: Support |
| Proposal 194: Oppose | Proposal 195: Oppose | Proposal 196: Oppose | Proposal 197: Oppose |
| Proposal 198: Support | Proposal 199: Support | Proposal 200: Support | Proposal 201: Support |
| Proposal 202: Support | Proposal 203: Support | Proposal 204: Oppose | Proposal 205: Support |
| Proposal 206: Support | Proposal 207: Support | Proposal 208: Support | Proposal 209: Support |
| Proposal 210: Support | Proposal 211: Oppose | Proposal 212: Oppose | Proposal 213: Oppose |

Proposal 214: Oppose
Proposal 218: Oppose
Proposal 222: Oppose
Proposal 226: Oppose
Proposal 230: Oppose
Proposal 234: Support
Proposal 238: Support
Proposal 242: Support
Proposal 246: Support
Proposal 250: Support
Proposal 254: Oppose

Proposal 215: Oppose
Proposal 219: Support
Proposal 223: Oppose
Proposal 227: Oppose
Proposal 231: Oppose
Proposal 235: Support
Proposal 239: Support
Proposal 243: Oppose
Proposal 247: Support
Proposal 251: Support
Proposal 255: Support

Proposal 216: Support
Proposal 220: Oppose
Proposal 224: Oppose
Proposal 228: Support
Proposal 232: Oppose
Proposal 236: Support
Proposal 240: Oppose
Proposal 244: Support
Proposal 248: Support
Proposal 252: Oppose

Proposal 217: Support
Proposal 221: Oppose
Proposal 225: Oppose
Proposal 229: Oppose
Proposal 233: Support
Proposal 237: Support
Proposal 241: Oppose
Proposal 245: Oppose
Proposal 249: Support
Proposal 253: Oppose

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I've been going to the Kenai River since 2005. It started off with just my son and myself. In July ,2023 we had 26 people stay at RW fishing and my wife and myself back in September. We all enjoy going to the Kenai but something needs to be done to protect the fishing especially the king salmon. I think the last time we were allowed to target kings was 2018. I'm fine with that but taking so long to truly address the issues with the kings is not acceptable. I love fishing for sockeye but it's nothing like catching a big king. The king salmon runs on the Kenai river need to get back to what they used to be so future generations can enjoy fishing for them. Last year we spent nearly \$100,000 (food, lodging, guided trips, etc.)between all of us without including airfare or car rental. We are going back again this year.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

David Dias
South Lake Tahoe, CA

February 8, 2024

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

Dear Board of Fisheries,

My family has owned and operated seine boats for 33 years in the Prince William Sound. I raised my two boys on our boat and they now are both captaining their own boats. We are vested in a seafood processing business. The salmon business is our livelihood. Salmon hatcheries enhance the wild stock and strengthen our fisheries. This fact has been proven scientifically and statistically time and time again. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) **Lack of Scientific Evidence:** Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) **Steady Increase in Wild Salmon Returns:** Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

Heather Durtschi



Girdwood, Alaska

February 5, 2024

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

Dear Board of Fisheries,

I live in Girdwood, and I'm a part of commercial fishing and seafood processing. I currently share ownership of two Purse Seine vessels, CFEC permits, and equipment with my two sons that grew up in a family Alaska fishing business. Both boys traveled outside to attend University before returning to reside in Alaska and continue operating the family business. We rely on hatcheries in our fishing permit area to supplement harvestable amounts of salmon. Notably, we have witnessed historical record runs of wild salmon alongside our healthy hatchery returns in the thirty plus years in business.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate


salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

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- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Michael Durtschi

Girdwood, Alaska

January 31, 2024

Dear Chairman Wood and Board of Fisheries members:

I have been in Alaska for 36 years and my family goes fishing every summer to help feed my family.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Deborah Eckhardt
Sterling, AK

January 30, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska for nearly 70 years and sport fished on the Kenai Peninsula since I was 8 years old. Obviously I have witnessed changes in the abundance of Salmon during my lifetime. It is imperative that all reasonable and common sense actions need to be taken now to save the King Salmon. Accordingly, I ask the Board of Fisheries to adopt proposals 90, 106, 112, 141, and 150 submitted by the Kenai River Sportfishing Association.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Thank you for your service on the Board of Fisheries and for your consideration of my requests in this letter.

Sincerely,

William Eckhardt
Sterling, AK

February 12, 2024

TO: Alaska Board of Fisheries
Upper Cook Inlet Finfish Meeting 2024

RE: Support for Proposal 216

Reduce the commercial smelt guideline harvest level in Upper Cook Inlet from 200 tons to 100 tons

The Environmental Investigation Agency (EIA) and its supporters greatly appreciate the opportunity to submit public comments in support of Proposal 216 entitled “*Reduce the commercial smelt guideline harvest in Upper Cook Inlet from 200 tons to 100 tons*”.

The Forage Fish Management Plan (5 AAC 39.212) acknowledges the importance of forage fish, specifically including eulachon, as an essential ecosystem component to higher trophic level species. In prior Board of Fisheries discussions (e.g., the 2017 meeting) there were concerns referenced regarding how eulachon harvests may impact survival and rebuilding of endangered Cook Inlet beluga whales (CIBW). However, to date, there has been little attention, or recognition, of eulachon serving as an essential ecosystem component the Cook Inlet food web.

Eulachon are a critical prey for endangered CIBW emerging from a winter with limited food resources and entering a spring period of birthing and nursing¹. As a distinct population segment in Upper Cook Inlet, estimates of CIBW declined 2.3% annually from 2008 to 2018, then increased less than 1%/year to 2022². Through spring feeding on eulachon, CIBW can begin to rebuild their energy reserves, followed by feeding on king and coho salmon during the summer. But recent declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females.

Commercial harvests of eulachon in Upper Cook Inlet initially occurred in 1978, 1980, and 1998, with catches of 300, 4,000, and 18,900 pounds, respectively³. In 1998, ADF&G recommended an arbitrary 50-ton (100,000-pound) harvest limit for the Upper Cook Inlet commercial smelt fishery, resulting in a 1999 commercial harvest of 50 tons. Development of the Forage Fish Management Plan (5 AAC 39.212) closed the commercial fishery in Upper Cook Inlet from 2000 to 2004. With adoption of the Cook Inlet Smelt Fishery Management Plan (5 AAC 21.505), the commercial fishery reopened in 2005 with a 100-ton (200,000-pound) harvest limit, only hand-operated dip net as legal gear, and the intent to maintain this GHF until a general assessment of stock strength could be made. Based on a 2016 ADF&G study and a 2017 proposal, the board increased the GHF to 200 tons (400,000 pounds) in 2017.

¹ <https://www.fisheries.noaa.gov/resource/document/recovery-plan-cook-inlet-beluga-whale-delphinapterus-leucas>

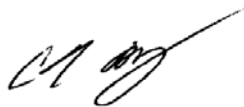
² <https://www.fisheries.noaa.gov/feature-story/new-abundance-estimate-endangered-cook-inlet-beluga-whales>

³ Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.

Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and ASL data are only opportunistically collected from the commercial harvest. Thus, the GHL increased from 50 to 200 tons over the past 25 years with no consistent assessment of changes in the eulachon population.

We urge you to pass Proposal #216 (changing the GHL back to the previous 100 tons level) because it follows the precautionary principle to ensure the commercial eulachon fishery's long-term sustainability while also promoting overall Cook Inlet ecosystem health and resiliency.

Sincerely,



CT Harry
Senior Ocean Policy Analyst

Submitted by: Mel Erickson
Community of Residence: Soldotna AK

Proposal 90, I oppose

Proposal 101 I support

Proposal 106 I oppose as written

proposal 107 I support

Proposal 135 I support , i go to chinitna bay almost every day for the last 10 years , the number of salmon have fallen drastically, not even enough fish for the bears anymore

Proposal 136. i Support, teh drift boats drop thier nets along the beach and next to river mouths, bears have learned to steal the salmon from the nets.

proposal 154 i support this proposal

proposal 155, I support this proposal

proposal 157 I support this proposal

proposal 158 I support this proposal

proposal 159 i support this proposal

Proposal 160 I oppose this proposal

proposal 161 I oppose this proposal

proposal 162 i support this proposal

proposal 171 i support this proosal

proposal 172 i support this proposal

Proposal 173 i oppose this proposal as written

proposal 174 i support this proposal

proposal 175 i support this proposal

proposal 1 I oppose section H, as it does not allow for halibut fishing north of Bluff point if a king salmon is onboard.

Proposal 4 I support this proposal

Proposal 1: Support With Amendments	Proposal 4: Support	Proposal 90: Oppose	
Proposal 101: Support	Proposal 106: Support With Amendments	Proposal 107: Support	
Proposal 135: Support	Proposal 136: Support	Proposal 154: Support	Proposal 155: Support
Proposal 157: Support	Proposal 158: Support	Proposal 159: Support	Proposal 160: Oppose
Proposal 161: Oppose	Proposal 162: Support	Proposal 171: Support	Proposal 172: Support
Proposal 173: Oppose	Proposal 174: Support	Proposal 175: Support	

Submitted by: Francis Estalilla
Community of Residence: Aberdeen, WA

SEE ATTACHED comments re Stock of Management Concern Action Plan AND Proposal 83

Proposal 1: Support	Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose
Proposal 43: Support	Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose
Proposal 78: Oppose	Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose
Proposal 82: Oppose	Proposal 83: Support	Proposal 84: Support	Proposal 85: Support
Proposal 86: Oppose	Proposal 87: Oppose	Proposal 88: Oppose	Proposal 89: Oppose
Proposal 90: Support	Proposal 91: Oppose	Proposal 92: Oppose	Proposal 93: Oppose
Proposal 95: Support	Proposal 96: Oppose	Proposal 97: Oppose	Proposal 98: Oppose
Proposal 99: Support	Proposal 100: Oppose	Proposal 101: Support	Proposal 102: Oppose
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Proposal 144: Oppose	Proposal 145: Oppose	Proposal 146: Support	Proposal 147: Support
Proposal 149: Oppose	Proposal 150: Support	Proposal 151: Support	Proposal 152: Oppose
Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose
Proposal 157: Oppose	Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support
Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support
Proposal 165: Support	Proposal 166: Support	Proposal 167: Support	Proposal 168: Support
Proposal 169: Oppose	Proposal 170: Support	Proposal 171: Support	Proposal 172: Oppose
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Proposal 181: Support	Proposal 182: Oppose	Proposal 183: Oppose	Proposal 184: Support
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Proposal 247: Support	Proposal 248: Support	Proposal 249: Support	Proposal 250: Support
Proposal 251: Support	Proposal 252: Oppose	Proposal 253: Support	Proposal 254: Support
Proposal 255: Oppose			

**PUBLIC COMMENTS FOR ALASKA BOARD OF FISHERIES
UPPER COOK INLET FINFISH
SUBMITTED BY FRANCIS V ESTALILLA, MD**

STOCK OF MANAGEMENT CONCERN (SMC) ACTION PLAN FOR KENAI RIVER LATE RUN KING SALMON (KRLRKS)

A. OPTIMAL ESCAPEMENT GOAL

The OEG of 15000-30000 large king salmon MUST be upheld in the Action Plan. **The board set the current OEG in 2020 with the intent of promoting stock recovery**, well before the designation to Stock of Management Concern (SMC) happened. **Imagine the ludicrous ABSURDITY of back-pedaling on that commitment** now that KRLRKS have been officially declared a SMC.

The recent Petition to list Southern Alaska chinook salmon under the federal Endangered Species Act specifically cites stock composition trends with depletion of female chinook in the population as a compelling argument for increasing escapement goals, NOT lowering them!

Stand firm in the name of conservation for your iconic state fish. The board MUST oppose ALL proposals seeking to lower the goal or to permit the set gillnet fishery (ESSN) to operate in any capacity at projected escapements less than 15000 large king salmon

B. STATUS QUO IS NOT AN OPTION

The entire point of this Action Plan is to further reduce the exploitation of returning KRLRKS. Any proposals that promote current levels of exploitation or that intentionally increase the potential impacts on the stock should be considered DEAD ON ARRIVAL. The Staff Action Plan has “status quo” as the first option for each of the fisheries impacting KRLRKS. In case anyone forgot, status quo is what has systematically led to the SMC in the first place. The misguided harvest management of the past is in dire need of meaningful reform, particularly the sport fishery which directly targets KRLRKS. The other options listed in each table after status quo are essentially blunt weapons... management actions in permanent regulation that severely limit in-season opportunity until the conditions of SMC de-listing are satisfied. **There is a better and more reasoned middle ground between status quo and these “blunt weapon” options.** There are currently 36 proposals before you specifically regarding the management of KRLRKS. Some of them are exceptionally well thought out from a conceptual perspective and deserving of your keen attention and thoughtful consideration for inclusion in the Action Plan, particularly Proposal 83 (P83).

P83 seeks to better balance conservation and opportunity with a much more disciplined and prescriptive harvest approach than status quo, while responsibly avoiding the more ominous “blunt weapon” options presented in Staff’s SMC recommendations.

The most significant features of P83 are:

- 1) **No fishing permitted below the lower OEG** for either the sport fishery or the ESSN's
- 2) Provisions that prescriptively promote **achieving a diversity of escapements throughout the full OEG range**, not just scraping for the escapement floor
- 3) Provisions for permitting reasonably **conservative and precautionary fishing opportunity** appropriately scaled to projected escapement levels within the OEG range.
- 4) Strict and intentional **conservation of nearly all females** by permanently prohibiting the retention of large king salmon in the sport fishery unless the OEG ceiling will be exceeded in-season.

This fourth key element of P83 is paramount to crafting an effective Action Plan. Stock analysis reveals that 92% of all female KRLRKS are greater than 34 inches in length. These fish **MUST** be conserved if you are to achieve any semblance of meaningful stock recovery. **No huevos, no pollo!** In 2017, the Board had the keen foresight to selectively conserve females in the early run stock by **prohibiting the retention of large kings unless the escapement exceeds the OEG ceiling**. The late run has never been afforded this most basic of protections. **Now is THAT time!**

To understand just where we are today in terms of hen conservation, one must have a grasp of what used to be a healthy, productive, and highly fecund escapement. The backbone of the population was once the 4-ocean age class, and 4-ocean **females** were at one time the most numerous component of any given return of KRLRKS. Moreover, 4-ocean hens were the largest most fecund spawners; the source of the clear majority of the eggs deposited in the gravel. To get a better idea of the **MASSIVE loss of aggregate fecundity** over my fishing career on the Kenai, let's look specifically at the stock composition of 4-ocean females THEN vs NOW.

When Kenai king returns were healthy in the 1980's, a typical late run was 60K, half of them were females, and two thirds of those were 4-ocean egg wagons packing an average of 12K eggs apiece. An educated estimate of aggregate 4-ocean fecundity might look like this... $60K \times 50\% \times 67\% \times 12K = 240 \text{ million eggs!}$ Now let's compare that to the most recent chinook life cycle with an average return of only 13K and only 21% of them 4-ocean hens. The fish are also now smaller for age, so the payload of eggs is proportionately reduced... let's say 11k (perhaps it's even less) just to be conservative. Current average fecundity each season now comes out to $13K \times 0.21 \times 11K = 30 \text{ million eggs}$. That's an 88% reduction in fecundity just on the 4-ocean age class alone!

Take home message... **more than ever, hens matter**. You owe it to the KRLRKS stock to eliminate the purposeful retention of female kings. Short of **NO FISHING**, **moving the threshold to retain large kings to the OEG ceiling** is the surest way to accomplish this objective.

C. SMC DE-LISTING CRITERIA

Staff's recommended conditions for de-listing are far too lenient. Under their proposed criteria, achieving the lower goal three times in succession by even the smallest handful of fish would satisfy the conditions for de-listing. Weak... **SO WEAK!**

The whole point of establishing a goal RANGE is to achieve escapements within the FULL range of that goal, **NOT just scraping to meet the escapement floor**. A more meaningful measure of recovery (and therefore a more reasonable condition of de-listing) should strive for something greater... MUCH greater. I would propose achieving escapements within the OEG for an entire chinook life cycle (six consecutive years). If that seems too lofty, perhaps consider achieving four consecutive escapements each within a different quartile of the OEG. Either of these is far superior to the milquetoast conditional criteria proposed by staff.

D. DEFINING THE SUSTAINABLE ESCAPEMENT THRESHOLD (S.E.T.)

This is arguably the most glaring omission of the entire Action Plan. The document doesn't even get past the second page before it explains how we conveniently get out of the penalty box, yet there is ZERO mention of the specific numeric threshold for a more acute listing to Stock of Conservation Concern. This speaks to the cultural bias within the agency to maintain or resume status quo... that the listing is nothing but an inconvenient formality along the way to business as usual.

NOT SO FAST!

I would call your attention to this pertinent clause... *“performance measures appropriate for monitoring and gauging the effectiveness of the action plan that are derived from the principles and criteria contained in this policy.”*

This action plan should NOT be adopted without defining specific metrics to either remove KRLRKS from the SMC list as just discussed above, or whether we need to double down for the more acutely emergent Stock of Conservation Concern. Without a numerically specific SET, it begs the question, “How would we know when we are there?”

The text string “SET” appears 50 times in Staff’s SMC document... 49 out of 50 times it refers specifically to the set-gillnet fishery. Only ONCE does it refer to Sustainable Escapement Threshold (SET)... and even then, only in passing. It is NEVER numerically defined for this stock.

For the sake of full transparency and accountability, it is incumbent on this board to specifically and numerically define the SET for a Stock of Conservation in its final Action Plan. If it can't be done during this meeting, include prescriptive language in the Action Plan to Staff that demands a specific SET be defined BEFORE your next regularly scheduled meeting.

E. LOOKING BEYOND COOK INLET

It's becoming ever more clear that the perilous depletion of KRLRKS is attributable to factors FAR beyond the scope of this Upper Cook Inlet meeting. I would call your attention to this final clause... *“consider how far-reaching actions to conserve Kenai River late-run king salmon should extend within and beyond Upper Cook Inlet”*

The marine environment is where KRLRKS spend the clear majority of their lives, yet ADFG invests next to nothing in trying to understand or measure ocean impacts to KRLRKS. Oft-cited “poor ocean conditions” and climate change are frequently mentioned as convenient scapegoat factors. Realistically, there is virtually nothing that can be done to acutely manage climate change. On the other hand, the largely unrecognized reality is that **human activity is a HUGE part of “poor” ocean conditions**. In more ways than managers care to admit, **we ARE the ocean conditions**.

An unknown but likely very significant impact occurs through trawl bycatch in the Gulf of Alaska and the Bering Sea. An unknown but likely very significant impact occurs in pre-terminal intercept fisheries, namely Kodiak Island and Shelikof Strait commercial fisheries directly targeting salmon as well as trawl bycatch of chinook salmon. Mounting scientific evidence demonstrates that a surplus of hatchery-produced pink salmon is over-grazing the North Pacific, much to the detriment of species like wild coho and chinook salmon competing for the same forage base. **These factors are significantly affecting KRLRKS before they ever make it back to Cook Inlet, stunting their growth and preventing them from recruiting to the older age classes like the 4-ocean hens so desperately needed for stock recovery**. The result is ever fewer, younger, smaller, and less fecund king salmon returning to the Kenai River to sustain the stock. The stock has been so altered by human activity that it is exceedingly unlikely to vigorously rebuild itself under the status quo. **Your** Action Plan must include a genuine commitment to gain a better understanding of these ocean factors and to act on them accordingly before it's too late.

Public Comment in support of PROPOSAL 83:

I am the author of this proposal, commenting in SUPPORT of same. Allow me to clarify the rationale and intent of Proposal 83 to address the concerns that Staff has about the proposal as cited in RC2.

*“If adopted, the *Kenai River Late-Run King Salmon Management Plan* would require actions to be taken by default without consideration of whether they were biologically and scientifically defensible. For example, the proposal calls for the Kenai River late-run king salmon fishery to start July 1 closed if the early-run king salmon fishery is closed on June 30 **despite the lack of correlation between early run and late run performance.**”*

The intent of the proposal language is two-fold... 1) **regulatory simplicity** and 2) **regulatory precaution** in the conservation of BOTH early run kings as well as late run kings. This clause only kicks in when the early run fishery has already been closed for failure to meet its escapement floor. **Staying CLOSED** until Staff can determine the in-season performance of the incoming late run in real time **is as SIMPLE as a regulation gets**. Closure of the late run fishery in this situation is highly defensible, both biologically and scientifically.

Staying closed helps to ensure every early run king remaining in the mainstem downstream of the Slikok sanctuary is NOT impacted by a July sport king fishery **for at least the first two weeks of July**. This would allow those fish to transit out of the lower river and into their respective mainstem sanctuaries or their respective tributary spawning destinations.

This would also provide a **more precautionary approach** to manage a weak late run. Despite Staff’s current assertion in RC2 that there is no correlation between the performance of early and late run kings, it’s OBVIOUS that kings are tanking statewide and the health of EVERY identifiable stock of wild Alaska-origin king salmon is in deep trouble. Moreover, Staff’s historic management actions in the face of EVERY early run closure has resulted in pre-emptive restrictions to the late run since 2012. **Anytime the early run has been closed, Staff has pre-emptively restricted what they anticipated to be a weak late run**, citing poor chinook productivity not just in the Kenai early run, but in ALL of Cook Inlet king salmon stocks.

I would direct your attention to this excerpt from the 2012 emergency order CLOSING the early run fishery:

*“Through June 18, all indices used to assess abundance of early-run king salmon in the Kenai River indicate the 2012 run is the lowest on record. Given the unprecedented low number of early-run king salmon, the department has determined that additional mortality associated with catch-and-release fishing cannot be justified. **In addition, based upon the poor performance of king salmon stocks in Cook Inlet and other areas of the state, it is likely the Kenai River late-run king salmon stock will also experience poor performance and require conservative management.** Therefore, the late-run king salmon fishery will begin without the use of bait in those waters remaining open to sport fishing for king salmon. The prohibition on the use of bait during July will reduce the harvest rate of both early- and late-run stocks that are within the open water areas.*

Now look at this excerpt from the 2013 emergency order CLOSING the early run fishery:

“Based upon the relationship between early-run king salmon abundance and late-run abundance, it is likely the Kenai River late-run will also experience below average run strength and be well below the preseason forecast. The prohibition on the use of bait during July will reduce the harvest rate of both early- and late-run stocks.”

And this from the 2018 early run closure:

“In 2018, the king salmon runs throughout Cook Inlet have consistently and significantly underperformed ADF&G preseason expectations resulting in restrictions and closures of inriver and marine sport fisheries. ADF&G will continue to monitor the Kenai River run as it develops and additional actions may be taken depending on the run strength.”

In total, historically six early run closures since 2012 have ALL prompted Staff to implement pre-emptive restrictions on the late run fishery PRIOR to July 1. Similar language regarding the relationship between **a weak early run correlating with high probability of a weak late run** was used to justify the emergency order.

In four of those six seasons, the late run fishery would go on to full CLOSURE without achieving the lower goal. **Bottom line, Staff closed TOO LATE to save enough fish.**

The historic record is clear. Whenever the early run has been weak enough to trigger closure, pre-emptive restrictions have been required. Retrospectively, there was a 2 in 3 chance that the late run would also require closure to prevent an escapement shortfall. In the interest of a more precautionary approach, **why not just start with a late run closure?** What RC2 doesn't tell you is that NOTHING locks such a closure in stone for the rest of the season. If the kings actually materialize in fishable numbers, the fishery can simply and justifiably be re-opened by emergency order.

...

In RC2, Staff cites this additional concern about Proposal 83:

“The proposal also dictates inseason action shall occur no later than the historic quarter point (around July 16) although, for a number of reasons, inseason projections may not be a reliable basis for management actions by that point.”

Staff's historical record of in-season action says otherwise. The posted record of emergency orders for the past two chinook life cycles is replete with examples of in-season action taken at or prior to the historic quarter point of king salmon passage at the sonar. It begs the question whether these emergency orders were implemented without “a reliable basis for management actions by that point.”

To clarify further, the proposal states that in-season action shall be CONSIDERED no later than the quarter-point of run-timing. It doesn't necessarily obligate Staff to take any in-season action if the run is performing to expectations. It does however obligate them to formally assess the run by at least the quarter point, a time frame that permits Staff to enact any necessary “step down” measures *while there is still time to accrue sufficient savings to help achieve the escapement goal*. The point here is **to minimize the risk of acting too late**, especially in a period of

exceptionally low productivity when **king salmon runs throughout Cook Inlet have consistently and significantly underperformed ADF&G preseason expectations.** This productivity issue CANNOT be dismissed when one considers that **the three most recent complete parental broods have all FAILED to replace themselves.** If the 2024 late run forecast is realized, that will make it four successive broods in a row.

...

Lastly, permit me to address Staff's final objection to Proposal 83 in RC2:

"This complex proposal seeks very prescriptive actions that may not be appropriate or scientifically defensible."

Staff's objection here is CLEARLY subjective, and perhaps more than a bit of a deflection. Complex? Really? They will still be doing the same EXACT pre-season and in-season assessment tasks that they've always performed every year. The only difference is that it will occur within a more conservative framework, adopting new thresholds to trigger **appropriate** in-season action to avoid any unnecessary mortality of late run kings. Staff has already demonstrated its lack of discipline and restraint in prosecuting the fisheries impacting late run kings. Looking back, ask yourself if their actions have proven to be "appropriate or scientifically defensible?" If so, how is it possible that late run kings are now a Stock of Management Concern?

Status quo clearly isn't working. Proposal 83 unequivocally reduces the mortality on large late run kings to more consistently achieve a diversity of escapements within the full range of the OEG as intended, rather than just scraping for the escapement floor.

Is Proposal 83 too complex? Not really. Perhaps it could be just what the doctor ordered... prescriptive enough that it SIMPLY can't be messed up.

Submitted by: Travis Every
Community of Residence: Kenai, Alaska

Proposal 90 Oppose- Adding additional time to the closure windows for no biological or scientific based reason is purely to reduce the ability of the ESSN fishery to harvest abundant sockeye heading to the Kenai and Kasilof rivers which are consistently exceeding the upper end of the respective management targets as it is. Resulting in significant foregone harvest and unknown impact/loss of future sockeye salmon yield.

Proposal 91 Support- The implication of a politically driven OEG of 15,000, coupled with "achieved" language within the the management plan is purely to close down the ESSN fishery. There is no biological backing or scientific data supporting this number or the action of it. It is there purely to close down a fishery, while that fishery could be projecting to meet all of its scientifically backed escapement objectives. The ESSN fishery should not be the one and only user group to be closed do to an arbitrary board generated OEG.

Proposal 101 Oppose- The 600ft option is the most restrictive tool currently within the management plan. The hour exemption is in place to give the department managers the flexibility to fish on abundance, without opening the fishery with a full compliment of gear, in order to attempt to meet escapement objectives within this mixed stock fishery.

Proposal 107 Oppose- This proposal seeks to put commercial fishing gear into a location /area which could increase the catch ratio of Chinook to sockeye compared to the 600ft fishery. That makes no sense when dealing with a low abundance of chinook.

Proposal 112 Oppose- We are consistently exceeding the upper end of sockeye goals to the Kenai and Kasilof rivers with the current goal ranges. The in-river and personal use fisheries are not harvesting what they are already currently allocated within the plan. Increasing this goal does nothing but increase the amount of foregone harvest from the commercial fleet and further impact the future returns, and yields of the sockeye stocks.

Proposal 128 Support- Clear board intent was given at the 2019 BOF Statewide meeting regarding this issue on the record, "when any portion of the Kasilof section is fishing to help control escapement into the Kasilof, the North K Beach set nets within 600ft would be fishing". This proposal was passed at that BOF meeting with a vote of 6-1.

Proposal 141 Oppose- This proposal seeks to allocate sockeye salmon away from the ESSN fishery by means of an unwarranted gear reduction regardless of the size or health of a run on any given year.

Proposal 144/145 Support- The current management plan completely disregards the need to harvest surplus numbers of Pink Salmon in UCI. Under current management plans less than 2% of Pink runs are harvested. Almost a complete loss of an economic resource to foregone harvest because of an unscientific or biologically backed management plan.

Proposal 153/162 Oppose- The commercial guided in-river fisheries have ample opportunity, with the ability to fish and run their businesses basically 5 days a week starting in May through October.

Proposal 81: Support	Proposal 90: Oppose	Proposal 91: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 107: Oppose	Proposal 112: Oppose	Proposal 128: Support
Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support	Proposal 153: Oppose
Proposal 162: Oppose			

Submitted by: Matthew Fagnani
Community of Residence: Anchorage, Alaska

The Board of Fisheries

Please accept these comments for your upcoming February 23-March 7 meetings:

The fish stock controversy continues year after year and is a balancing act to assure the return of all salmon species to the Kenai and Kasilof rivers. It is paramount that fish returns are perpetual for future generations.

Available evidence proves shallow gillnets reduce king salmon harvest. We must change the mesh depth gillnetters use to target sockeye to protect king salmon. I support Proposal 106.

Over the last 20 years, large escapements continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunities in sport and personal-use fisheries and likely greater numbers for future years. I support Proposal 112 to increase the Kenai sockeye in river goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet needs management that shares the conservation burden among all user groups and no longer prioritizes commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch, allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase the opportunity for Alaskan residents to harvest sockeye salmon. I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy. I support decreasing time, methods and means, and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks.

Thank you for considering my comments.

Proposal 90: Support Proposal 106: Support Proposal 112: Support

February 12, 2024


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

Dear Board of Fisheries,

I am opposed to Proposal 43. I worked in Alaska's Hatchery program from 1990 to 2018 and served as the Executive Director of CIAA from November 1996 to November 2018. During my tenure with CIAA, I was directly involved in the management of the Cook Inlet Hatchery program and always felt the Alaska Department of Fish and Game managed the program well including its priority to protect Alaska's wild salmon stocks. Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources. As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Gary Fandrei


Kenai, Alaska

Submitted by: Michael Fenton
Community of Residence: Sterling.AK

Dear BOF board members,

First of all I'd like to "thank you" for your service on the BOF 🙏. It's can be a sometimes thankless job but much needed and appreciated by all!

My name is Mike Fenton and my brother Murray and myself are co-owners of Fenton Bros Guided Sportsfishing here on the kenai. It's crazy how time flies as we are now the "old dudes" on the river. Between the two of us we have been guiding for 80 years!(that is not a miss print 😊) We've been doing for so long we took Methuselah and his family fishing back in the day!! We've seen lots of changes over the years!

I'm not going to go thru each proposal but will group a few together and hit some of the "high points" and issues I think we need to address! As you all know our fisheries has changed a ton over the years. From the "hey days" of our king fishery to the sad situation we find ourselves in now. More people/user groups chasing a shrinking resource makes for challenging management as you well know! With the reduction in our king numbers/seasons we have seen a tremendous transference of effort to our others species reds/silvers/fall fishery. This leads into one of the subjects that we feel needs to be addressed. Murray and myself spend most of our fall season fishing what we call the "middle river" it's about a 10 mile stretch from bings landing(mile marker 40) to the outlet of Skilak lake(mile marker 50). A beautiful stretch of river that we've felt very blessed to call our "office" over the years. I can confidently say we have guided this stretch more than anyone over the years. Over the last few years we have made a concerted effort to talk to many of the local private anglers along with our own customers as to what we need to do to protect our resource. Several things have consistently come up. We think it's time to make this stretch a single hook/no bait fishery! The amount of increase in effort in this stretch of river has been incredible. Another important reason is unlike the lower river where fish are "moving thru/pulsing" the middle river is a "staging" area, where fish lay/hang out until they move into a tributary or in the case of the late run silvers actually spawn! Will it make my job of "catching fish" harder? Absolutely it will but because of the exponential increases in effort it's our responsibility as stewards of our resources to do the right thing and we strongly feel it's long overdue. Along with this I think it's time to go back to a (2) fish silver limit in this stretch of river. There's poor fish see a constant barrage of bait and over the years we've gotten better at catching them so our exploitation rates have gone thru the roof! The overwhelming majority of our friends/clients/neighbors think it's time to "scale things back a bit" and make it 2 silvers ,no bait. While I'm on this subject there's another "situation" that has drastically changed the last few years. Seals!!! The population of seals has exploded in the river! I remember the first time I saw a seal in the middle river I thought I'd finally seen our Alaskan "Nessie" 😊. Over the last several years we will now have dozens of seals that will live in the middle river all fall!! The percentage of fish we catch with seal bites can be close to 90 percent!! They are putting a real hurt on our spawning/staging silvers and have now started eating our resident rainbows! I know it's a "federal mammal" and the board doesn't have the authority/jurisdiction to address but it has become a real issue and just another reason we need to protect these middle river fish a bit more!

Another important area of concern is our obvious problems with our king returns. We can blame the set netters, us darn guides, the trawl fishery, drastic increases in PWS pink numbers, poor inriver mgt practices, or even old mother nature but the reality is they are all to blame and it's not an easy fix! 😞. With that being said I think it would be incredibly "irresponsible" for the board to consider any proposals that ask for more commercial fishing time /area. These next several years we will be facing our lowest brood years on record and liberalizing any exploitation on a "stock of concern" would be incredibly irresponsible. I agree with Francis proposal 83 which will revise our inriver regulations to protect our female component of the run if/when we do have the opportunity to fish!

One more topic and I'll call her good!! I'm not sure if there was any actual proposal written up but I think it's time we consider expanding the dipnet fishing area! I had a conversation with someone in the dept about

moving the upper boundary to Cunningham park from the bridge! This would be about a mile increase, in good/navigatable waters. This fishery has also exploded in popularity and has become a real safety issue! If we moved the upper boundary it would spread out the effort, make it a better experience and most importantly much safer. These fish belong to the residents of Alaska and I think it's our responsibility to provide a safe area for this opportunity! A simple " fix" in my old brain!! 😊.

Lots more to chat about but we can do that at the meeting! I will be popping in/out of meeting and would feel " honored" if you wanted to talk about anything. Feel free tha call anytime!

I " thank you" for your time and look forward to meeting you in person soon!

Mike Fenton/Fenton Bros Guided Sportsfishing



PC83

Submitted by: Erick Fish

Community of Residence: Cooper Landing

Commenting on Proposals 179 and 180 in opposition to. These proposals are not rooted in any current scientific data. Examples of gross misuse of the resource are not available. Evidence of singular random acts should not be enough to close an entire portion of Upper Kenai River. As a full time year round resident and guide in CooperLanding I do not think its a good look for a board comprised mostly of guides to close a portion of the river only when it's convenient to them, after tourist season. Private property owners also do not get to decide the fate of the public in public waters with little to no scientific research performed or presented. Coho salmon studies are currently taking place along the entire Kenai River to get a better understanding of the species. Preempting their scientific studies that may indeed show a surplus of salmon would be a waste of state money and resources. Spawning and post spawn populations of salmon exist along the entire Upper Kenai River, closing one section would only increase the pressure in another section, potentially having more of an impact on the population than sporadic encounters amongst all the salmon. Again no real scientific data has been presented about the salmon and no estimates on numbers of anglers during that period exist. Closing the Upper Kenai River for six months is excessive to say the least and potentially damaging to local economies. I encourage the board to take no action on these proposals at this time.

Proposal 179: Oppose Proposal 180: Oppose

February 5, 2024

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

Dear Board of Fisheries,

I'm a commercial fisherman from Whittier, Alaska. This the most serious threat to salmon hatchery production in many years. The entire board of fish are new members with little or no understanding of hatchery benefits. They are being bombarded by anti-hatchery interests that are using a lot of lower 48 hatchery issues. The basic fact is salmon hatcheries in Alaska are not and have not been negatively affected natural stocks. The evidence is simply reviewing the wild salmon runs and the hatchery runs. Both are up from historic data.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries

and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) **Lack of Scientific Evidence:** Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) **Steady Increase in Wild Salmon Returns:** Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) **Social and Economic Benefits:** Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

Russell Fitzwater

██████████@██████████

Girdwood/Whittier, Alaska

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have been coming to Alaska fishing the Kenai and Cook Inlet for over 20 years. I am a big supporter of conservation. I have witnessed the "on and off" switch that the gill nets have caused with over-fishing and not allowing the native kings and sockeyes return to their natural habitats to spawn. The commercial fisherman have ruined the DNA of the largest species of salmon on the earth and to get back to the sizes and numbers once provided by nature may never happen again. They should be banned from this type of fishing as it is ruining the eco-system and future runs, if they aren't already harmed already. The sizes of fish are smaller, the amount in the runs less and the sports fisherman will stop flying to Alaska to fish if it continues. The commercial fisherman need to be restricted from their harmful actions, as they have destroyed the greatest fisheries in the world for greed. The unnecessary waste of kings at the expense of the sockeye catch is one of the greatest travesties this world has ever seen. Protect our fisheries and habitat before all is lost.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

RJ Forte
Draper, Utah, United States, UT

Submitted by: Collin Fountain
Community of Residence: Memphis, TN

LOWERING the current OEG for late-run king salmon in order to allow/justify commercial fishing and netting in the inlet is entirely unacceptable and should not be considered. Please consider proposal 83 that proposes a conservative start to the fisheries and then loosening restrictions when/if the kings show up in acceptable numbers.

Proposal 83: Support

Submitted by: Nigel Fox
Community of Residence: Sterling

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The anglers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

Submitted by: Erik Frampton
Community of Residence: Anchorage, Alaska

In regards to Proposals 189-203 and the Upper Cook Inlet Personal Use fishery as a whole. I feel it would be beneficial to require users to apply for personal use permits in advance, similar to Tier 1/2 sustenance hunts in the State. This would require some foresight on the part of the users and potentially weed out some of the more irresponsible participants.

My comment pertains to Proposal 185 and specifically the steelhead fishery on the Kasilof river. Currently the Kasilof is the only stream on the Kenai Peninsula that does not allow for a periodic closure to protect overwintering/spawning fish. In fact, the regulation book explicitly states that the river is "open to fishing year-round" for steelhead. Spawning staging areas are easily accessible and regularly exploited at the mouth of Crooked Creek. As restrictions on other adjacent fisheries tighten, the Kasilof is experiencing an increase in pressure via the early season hatchery chinook and year round steelhead fishery. The Board should take measures to protect spawning steelhead via a closure similar to that on other Southern Kenai Peninsula streams. For more information please see the attached maps showing steelhead locations in April and May from the study "Gates, K. S., and Boersma, J. K., 2010, Spawning and Seasonal Distribution of Adult Steelhead in Southcentral Alaska's Kasilof River Watershed from 2007 to 2009: US Fish and Wildlife Service: Soldotna, Alaska, v. Alaska Fisheries Data Series Report 2010-06"

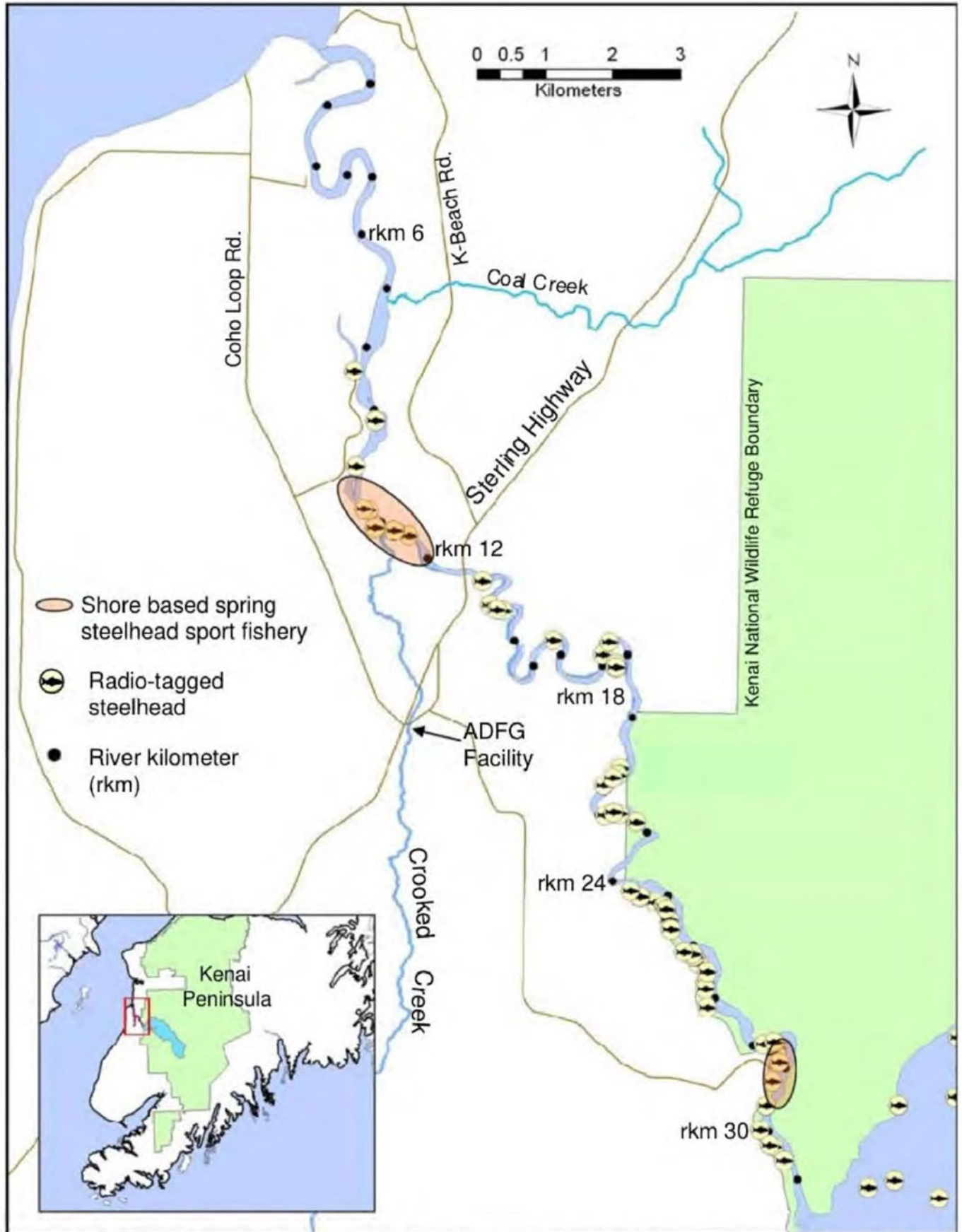


FIGURE 7.—Locations of radio-tagged steelhead during mobile tracking events conducted in the lower Kaslof River watershed during April, 2008. Shaded areas represent the general locations of fishing pressure from sport anglers in the Kaslof River during April.

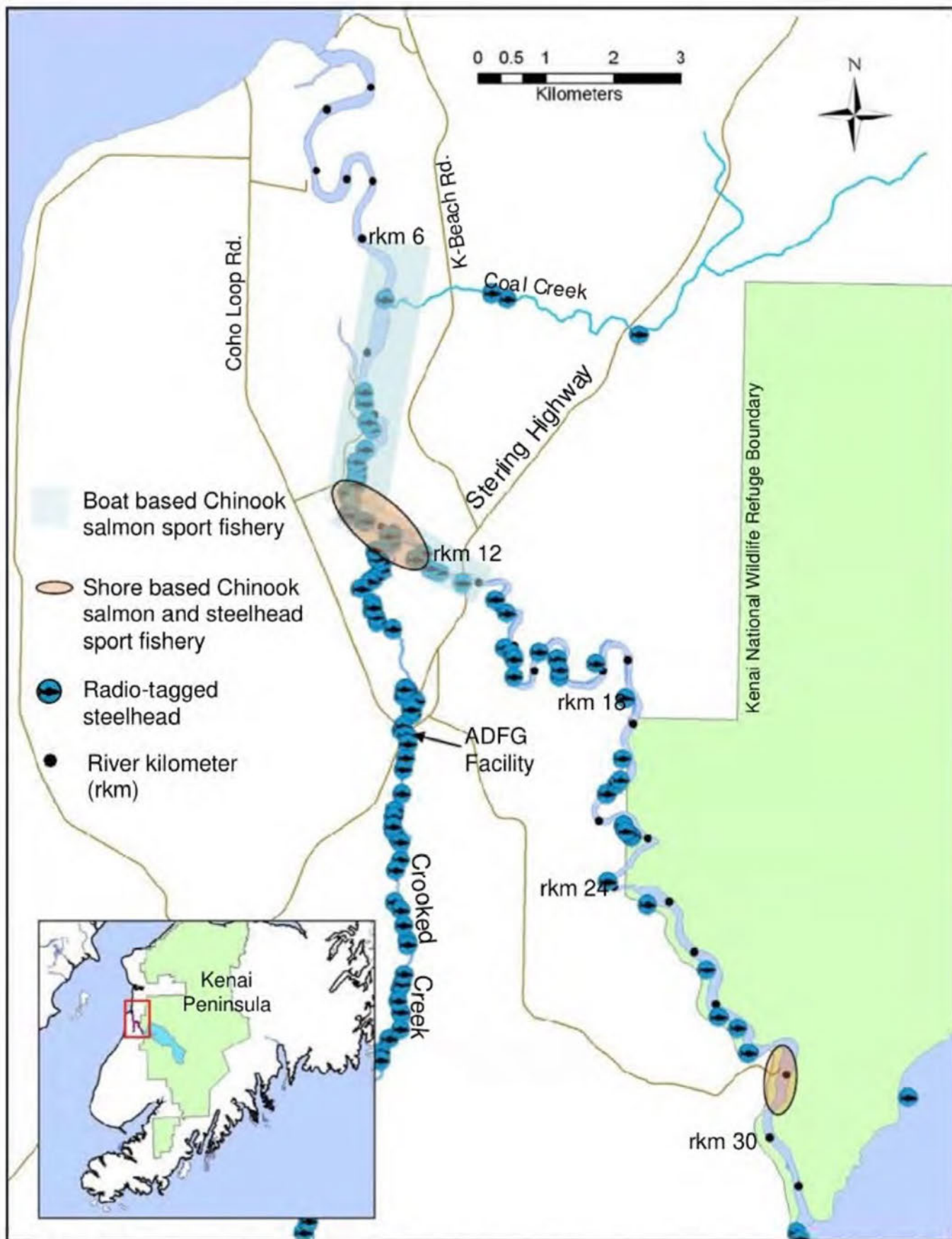


FIGURE 8.—Locations of radio-tagged steelhead during mobile tracking events conducted in the lower Kasilof River watershed during May, 2008. Shaded areas represent the general locations of fishing pressure from sport anglers in the Kasilof River during May.

Submitted by: Cooper Freeman
Community of Residence: Homer, AK

I am writing to offer my strong support for Proposal 216.

Proposal 216: Support

Submitted by: Sarah Frostad-Hudkins
Community of Residence: Chelan, WA

My name is Sarah Frostad-Hudkins. I am a third generation commercial fisherman on Salamatof Beach. I am a Kenaitze Tribal Member and a Board Member for Kenai Peninsula Fishermen's Association. My statement today represents myself, my family and our families 100 year old legacy. My Grandfather came to Alaska in the early 1920's and worked the fish traps for Libby, McNeil, and Libby. I currently fish on the same plot of land where he began, 100 years ago. The remnants of the olds traps can be seen at low tide which is a reminder of the deep history that surrounds our fishery.

The actions of the 2020 Board of Fisheries meeting has been detrimental to the Eastside Setnetters, leaving many unable to financially support themselves and a fear of what is happening to this generational fishery. We understand that changes have to be made to support the return of the large Kenai River King Salmon and we want those changes to be scientifically sound and allow our fishermen to have the opportunity to harvest sockeye salmon, when sockeye are abundant in the Inlet.

I support proposals 77, 78 and 80. I do ask that the Board to please reconsider the unattainable Optimal Escapement Goal of 15,000-30,000 large kings. I believe that the biological goal recommended by the Alaska Department of Fish & Game managing the Eastside Setnetters to the SEG of 13,500-27,000 large kings provides for future yields.

I strongly oppose proposal 90. This proposal is allocative. The current 36 hour window that is in regulation, is sufficient and the department should have the flexibility to open and close our fishery as needed to harvest the larger pulses of sockeye salmon entering the Kenai River. We do not want to have a forgone harvest and loss of future yield in the sockeye stocks due to continuous management objectives.

My long list of the proposals that I both support and oppose are listed below. I am attending the Board of Fisheries Meeting and would encourage the conversations to continue.

I strongly oppose proposals 90 and 106, in addition to proposals: 101, 112, 141, 150, 153, 154, 155, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232.

I support proposals: 75, 76, 77, 78, 80, 81, 82, 83, 85, 86, 87, 88, 91, 94, 97, 99, 100, 102, 103, 110, 114, 116, 117, 119, 120, 121, 122, 123, 124, 125, 128, 129, 130, 131, 133, 143, 144, 145, 146, 147, 148, 151, 152, 160, 161, 163, 164, 173, 176, 177, 178, 179, 180, 181, 185, 186, 187, 189, 190, 193, 195, 196, 197, 198, 199, 200, 211, 215.

Our fishery has been evolving and the list is long of changes that the Eastside Setnetters have made over the last 50 years, but I believe that there is a collaborative effort being made so that all user groups can conduct their businesses. Furthermore, my hope is that I can continue harvesting salmon on the same plot of land that my Father and Grandfather did, alongside my children and grandchildren. Our fishery is not only our livelihood, but our 100 year old family legacy. Please do not eliminate us.

Sincerely,

Sarah Frostad-Hudkins

frostadfisheries@gmail.com

Proposal 2: Oppose	Proposal 3: Oppose	Proposal 4: Oppose	Proposal 75: Support
Proposal 76: Support	Proposal 77: Support	Proposal 78: Support	Proposal 80: Support
Proposal 81: Support	Proposal 82: Support	Proposal 83: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 94: Support	Proposal 97: Support	Proposal 99: Support
Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support	Proposal 103: Support
Proposal 106: Oppose	Proposal 110: Support	Proposal 112: Oppose	Proposal 114: Support
Proposal 116: Support	Proposal 117: Support	Proposal 119: Support	Proposal 120: Support
Proposal 121: Support	Proposal 122: Support	Proposal 123: Support	Proposal 124: Support
Proposal 125: Support	Proposal 128: Support	Proposal 129: Support	Proposal 130: Support
Proposal 131: Support	Proposal 133: Support	Proposal 141: Oppose	Proposal 143: Support
Proposal 144: Support	Proposal 145: Support	Proposal 146: Support	Proposal 147: Support
Proposal 148: Support	Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support
Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose
Proposal 157: Oppose	Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose
Proposal 169: Oppose	Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose
Proposal 173: Support	Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support
Proposal 178: Support	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 183: Oppose	Proposal 185: Support	Proposal 186: Support	Proposal 187: Support
Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose	Proposal 192: Oppose
Proposal 193: Support	Proposal 194: Oppose	Proposal 195: Support	Proposal 196: Support
Proposal 197: Support	Proposal 198: Support	Proposal 199: Support	Proposal 200: Support
Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose	Proposal 208: Oppose
Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose
Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support	Proposal 217: Oppose
Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose	

2024 UCI Board of Fish Meeting

Written Public Comments

Brian and Lisa Gabriel

February 12, 2024

Mr. Chairman and Members of the Board of Fisheries,

We have lived on the central Kenai Peninsula for over 55 years and resided in the City of Kenai since 1987. We have also owned and operated a commercial setnet site on the Eastside of Cook Inlet continually since 1987. During this time, we have seen many changes to our fishery, many of these changes manifesting over the past ten years due to low Kenai River Chinook Salmon abundance.

As the Board of Fisheries (BOF) looks at options to allow for opportunity for harvest of Sockeye salmon, while minimizing Chinook salmon harvest within the Eastside Setnet (ESSN) Fishery, we have several thoughts and concerns we would like the Board to consider:

- In 2017, the BOF adopted the large Kenai River King escapement goal and revised the Sustainable Escapement Goal (SEG) to 13,500 to 27,000 for large Kings. At the same meeting the BOF moved the Kenai King Salmon counter from river mile 8 to river mile 14.
- At the 2020 Upper Cook Inlet BOF meeting, the Board adopted an Optimum Escapement Goal (OEG) of 15,000 to 30,000 large Kenai Large King Salmon, which coincidentally, was the same range as the all Kenai Large King Salmon goal that was in place prior to 2017. This OEG was not a recommendation by the Department of Fish and Game, but rather a Board generated goal. The Department does not evaluate OEGs, as they are set by the Board and can incorporate non-biological factors.

What we are asking the Board to consider, is to allow for targeted harvest management strategies of Sockeye salmon within the ESSN fishery, while minimizing the harvest of Late Run Kenai River Chinook salmon when projecting escapement in the range of 13,500 (SEG) to 15,000 (OEG) Chinook salmon.

Every other non-target fishery for Kenai River Late Run Large King that is presumed to have a level of Kenai River Late Run King mortality associated with prosecution of that fishery, is allowed some level of opportunity. These fisheries include the Gulf of Alaska Trawl fisheries, Kodiak area setnet and seine fisheries, Lower Cook Inlet setnet and seine fisheries, Cook Inlet Drift fishery, Kenai and Kasilof River Personal Use Fisheries, and Kenai River sport fisheries. In the case of some of these fisheries, they are actually liberalized to harvest excess Sockeye salmon due to the ESSN fishery being severely restricted or shut down completely. The impacts of those fishery liberalizations are also unknown.

While the mortality of late run Kenai King salmon is likely low in these fisheries, there is a presumed accepted Kenai King mortality within these fisheries. (a request for this data was asked of the Department and to date we have not received a reply).

In other words, the ESSN fishery is the only non-target Kenai River Late Run Large King Salmon fishery that is not allowed harvest opportunity for targeted Sockeye Salmon when the Department is projecting to meet between 13,500 to 15,000 Kenai River Late Run Large Kings.

Historical average of ESSN exploitation of Kenai River late run Chinook salmon is around 13% in a fully prosecuted fishery using entirely 45 mesh deep nets. The Department has been given management tools since 2012 to reduce this exploitation rate through gear, area and time restrictions when prosecuting the harvest of Sockeye salmon. It is our hope that the BOF recognizes that the ESSN fishery is not a directed King fishery and should be treated the same as the other non-directed Kenai River Run King Fisheries. We believe that conserving Kenai River Late Run Large King salmon is important and at the same time recognize that there is Sockeye harvest opportunity for the ESSN fishery between the SEG and OEG.

While reading through the 2023/2024 UCI BOF proposal book and the newly released 2023 Kintama Report titled “Relative Fishing Depth and Harvest Rates of 15, 22, and 29 Mesh Setnets in the East-Side Fishing Area, Cook Inlet, Alaska, with an evaluation of the Potential Use of Acoustic Telemetry to Establish Migration Profiles of Returning Salmon”, there appears to be a desire within the in-river sport fisheries and the folks at Kintama to create a narrative that closing down the Beach nets within the ESSN fishery (these are the nets closest to the shoreline and are generally fished using running lines instead of just anchoring each end) and focusing fishing efforts further offshore will result in less harvest of Kenai River Late Run Large Kings. Proposal 107 is one proposal that recommends these management actions in some form.

In addition, and more incredulous, is that a research firm that was engaged by the Department to study harvest rates of 15, 22, and 29 mesh deep nets in the ESSN fishery close to the mouth of the Kenai River in 2023, implies that closing down the Beach nets (the historical fish locations along the East side of Cook Inlet for over 146 years) and moving fishing offshore will potentially reduce Kenai River Late Run Large King harvest within the ESSN fishery.

What data and compelling evidence was cited by the Kintama group to assert this claim? On page 60 of the Kintama report under “Management Implications” it states “Our observation of the behavior of the Chinook charter boat sport fishing in 2013 was that they focused on fishing very shallow waters just off the beach at Anchor Point (2-3 m deep; 7-10’), so Chinook may be disproportionately abundant in very shallow waters near the beach. If so, then moving setnet fisheries farther away from the beach might reduce the interception rate of Large Chinook but because clearance under the nets will be greater and because Chinook may preferentially select very shallow waters. Resolving these uncertainties in future studies might identify further ways to reduce the harvest of large Chinook.” That’s a lot of assumptions.

Additionally, on page 61 item (7) under ‘Recommendations for Further Study’ the authors seem to contradict their thesis regarding behavior of Kenai River Late Run Large King salmon along the shoreline based on the marine charter fleet by stating that “Our 2013 study found that

acoustically-tagged Chinook appeared to preferentially “patrol” the offshore edge of the ESSN zone relative to areas even farther offshore, a behavior different to sockeye”, before referencing the Anchor Point charter fleet once again.

Below are a couple of things to consider with these statements:

- a) A quick check of the available genetic testing data for this marine sport fishery which spans from 2014 to 2018, shows that 7.8% of the King salmon (all sizes) harvested in this fishery are of Kenai River origin. The data shows that during this period, an average of 92 Kenai Kings (all sizes) were harvested annually, and the average annual Kenai River Late Run Large King total return was 22,220.

- b) In August of 1998, a report was published by the Department titled “Investigation of Methods and Means to Minimize Chinook Salmon Harvest in the East Side Set Net Fishery of Upper Cook Inlet, 1996” (Special Publication No. 98-3). The primary purpose of this study was to determine if there could be a “Conservation Corridor” established within the ESSN fishery to pass Kings to the Kenai River. The observation areas were set up in three zones both North and South of the Kenai River. Within the zones were areas designated as Near, Mid and Offshore sections for observation of Chinook harvest and in what depth of the net the fish were caught. Essentially, what this study found was that the harvest of Chinook Salmon within the ESSN fishery North of the Blanchard Line (North K-Beach and Salamatof beach) was more prevalent in the nets either in the Mid and Offshore sectors. In addition, the study found that without exception, that the harvest rate of Sockeye salmon was highest in the near shore nets. Please read this report.

- c) Harvest data of the ESSN fishery when comparing King harvests at times when different harvest areas were open within the ESSN fishery (all ESSN, Kasilof out to 1.5 miles, Kasilof out to .5 miles, Kasilof 600’, North K-Beach to 600’ and total ESSN fishery to 600’) clearly shows higher Sockeye harvest rates with less impact to Kings.
 This data makes sense because there is less gear in the water but also shows that Kings are not harvested at a higher rate along the beach if the outer areas are closed. Ideally, we would like to see opportunity throughout all areas of the ESSN. The purpose of pointing this out is to dispel the notion that the Beach nets are primarily responsible for most of the King harvest within the ESSN fishery. Looking at the data, it would appear that there may be a higher likelihood of increased King harvest and less Sockeye harvest if the fishing effort is moved farther away from the beach. Considering the available data, and the scope of the study, we feel that it is extremely irresponsible for Kintama to insert this theory into their report and wrap it into Management Implications.

We support testing new gear types in the Eastside Setnet Fishery that could provide reasonable harvest of targeted sockeye while minimizing King mortality.

Thank you for your time and consideration.

Brian and Lisa Gabriel

Lisa Gabriel

Kenai, Alaska

Support Proposal 77:

This proposal will allocate some sockeye back to the Eastside Setnet Fishery, a 145-year historic harvester of sockeye salmon in Upper Cook Inlet and manage the Eastside Setnet Fishery to offer some harvest opportunity on plentiful targeted sockeye salmon. I favor the Eastside Setnet fishery being managed to the sustainable escapement goal (SEG) to harvest targeted sockeye salmon. The current OEG of 15,000 to 30,000 large Kenai River Late Run King Salmon goal closes fisheries and does not provide the protection of Late Run Kenai River King Salmon as intended by the Board of Fisheries in 2020. The prescriptive and surgical management of hitting the lower end of the OEG at 15,000, which is in the mid-range of the SEG of 13,500-27,000, has prevented harvest opportunity of sockeye only in the Eastside setnet fishery even when the lower end of the Late Run Kenai River King Salmon SEG is projected, while all other fisheries are liberated for the harvest of sockeye. The board allows harvest and interaction with Chinook Salmon in EVERY other fishery in their pursuit of Sockeye in Upper Cook Inlet and other migratory areas of the State. It is not fair or equitable. The restrictions on our historic fishery in 2023 should never be repeated.

Support Proposal 78:

This proposal will allocate some sockeye back to the Eastside Setnet Fishery, a 145-year historic harvester of sockeye salmon in Upper Cook Inlet and manage the Eastside Setnet Fishery to offer some harvest opportunity on plentiful targeted sockeye salmon. I favor the Eastside Setnet fishery being managed to the sustainable escapement goal (SEG) to harvest targeted sockeye salmon. The current OEG of 15,000 to 30,000 large Kenai River Late Run King Salmon goal closes fisheries and does not provide the protection of Late Run Kenai River King Salmon as intended by the Board of Fisheries in 2020. The prescriptive and surgical management of hitting the lower end of the OEG at 15,000, which is in the mid-range of the SEG of 13,500-27,000, has prevented harvest opportunity of sockeye only in the Eastside setnet fishery even when the lower end of the Late Run Kenai River King Salmon SEG is projected, while all other fisheries are liberated for the harvest of sockeye. The board allows harvest and interaction with Chinook Salmon in EVERY other fishery in their pursuit of Sockeye in Upper Cook Inlet and other migratory areas of the State. It is not fair or equitable. The restrictions on our historic fishery in 2023 should never be repeated.

Support Proposal 81:

Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in a foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon, and have inflicted severe economic impacts to the fishers, as well as the Central Peninsula borough and all of the local communities. This proposal would provide the Alaska Department of Fish and Game an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar projects 13,500 fish, which is the sustainable escapement goal for Kenai River large late-run king salmon established by the department, thereby assuring that a sustainable level of king salmon escapement is achieved while

providing additional sockeye salmon harvest opportunity beyond what is currently allowed. The current plan closes the sockeye-targeted set gillnet fishery and immediately liberalizes the commercial drift fishery, the personal use fisheries, and commercial guided in-river sport sockeye fisheries to target sockeye salmon.

Oppose Proposal 90:

I oppose windows in the Eastside Setnet fishery. Windows tie managers' hands when/if fish are abundant in the fishing district during the window closure. They do not support fishing on abundance in the Eastside Setnet fishery.

Support Proposal 91:

Restrictions placed on the Kenai River king salmon sport fishery for the conservation of the targeted stock, large late run Kenai River Kings, should not in turn have restrictions placed on the set gillnet fishery, that is a sockeye targeted fishery, if the department of fish and game is projecting to achieve the management objective for Kenai River Late run kings. The regulation of having to achieve the OEG instead of projecting the OEG is purely punitive to unnecessarily restrict the ESSN from the fishery.

Oppose Proposal 95:

The data does not support the narrative that shorter nets catch less king salmon.

Support Proposal 100:

This proposal provides ADFG an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar goal exceeds 13,500 fish, which is the sustainable escapement goal (SEG) for Kenai Rive late-run large king salmon established by ADFG, thereby assuring that a sustainable level of escapement is

achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. In considering these emergency order openings the department will evaluate the number and size of king salmon harvested in the set gillnet fishery and manage conservatively to minimize king salmon harvest as well as the need to ensure provisions of other related management plans are met.

Oppose Proposal 101:

Currently under the Kenai River Late-Run King Salmon Management Plan and the Kasilof River Salmon Management Plan the commissioner has the authority via Emergency Order to open and restrict fishing to within six hundred feet of the mean high tide mark, in the ESSN fishery which is exempt from hours. The hourly exemption is so ADFG managers have the full hours available to them if the sockeyes are abundant on the beaches during the week so the entire setnet fishery could be fished to harvest their targeted sockeye. This will help managers manage to their sockeye management objectives. The commissioner does have the option to reduce gear in the 600ft fishery. The 600ft fishery can be a very helpful tool in harvesting targeted sockeye in the ESSN fishery and restricting the hours when sockeyes are plentiful on the beach is contrary to those objectives.

Support Proposal 102:

Recent efforts to conserve Kenai River late-run king salmon and meet the Kenai River late-run king salmon optimal escapement goal of 15,000 large fish have resulted in a foregone yield of Kenai River late-run sockeye salmon and Kasilof River sockeye salmon, and have inflicted severe economic impacts to the fishers, as well as the Kenai Peninsula Borough and all of the local communities. This proposal would provide the Alaska Department of Fish and Game an additional tool to harvest surplus sockeye salmon with set gillnet gear when Kenai River late-run large king salmon sonar projects 13,500 fish, which is the sustainable escapement goal for Kenai River large late-run king salmon established by the department, thereby assuring that a sustainable level of king salmon escapement is achieved while providing additional sockeye salmon harvest opportunity beyond what is currently allowed. The current plan closes the sockeye-targeted set gillnet fishery and immediately liberalizes the commercial drift fishery, the personal use fisheries, and commercial guided in-river sport sockeye fisheries to target sockeye salmon. All because we are attempting to achieve a politically driven OEG not the biologically backed SEG.

Oppose Proposal 106:

The current regulation regarding gear in the 600ft fishery is fair. Setnetters should be allowed to make that decision based on the current regulation and their ability to maximize their targeted sockeye harvest. Gear is indeed reduced under (e)(3)(G)(i) and (ii). Nets can by regulation be reduced. The author of the proposal is incorrect.

Oppose Proposal 107:

The statement by the author that "The creation of the 600 ft. fishery in theory was to reduce Chinook Salmon catches in the east side set gillnet fisheries" is incorrect. It was to allow limited harvest opportunity in the ESSN fishery to harvest plentiful targeted sockeye salmon while reducing the harvest of chinook salmon that could possibly happen with a fully prosecuted fishery. Data does not support that there is an increased chance in Chinook Salmon harvest in most areas of the ESSN fishery that the 600 ft fishery occupies. Moving nets off the beach does not make sense if you want to harvest sockeye. Data does support that all nets are off the bottom during most of the stages of the tide while fishing on the beach and offshore nets.

Oppose Proposal 112:

The sockeyes that are already allocated to the in-river users are not currently being harvested by in-river users resulting in foregone harvest. Why would you want to allocate more and increase the pressure of boats, boots on the banks and in the river? Changing the numbers in the regulation doesn't correct the over escapement of sockeye which threatens future sockeye yields.

Support Proposal 128:

At the March 2019 BOF Statewide meeting, "clear intent" was given by a BOF Member as to when the NKB 600 ft fishery should be used. In passing a portion of 5 AAC 21.310. (C) (ii), on the record, he stated his position was when "any portion of the Kasilof Section is fishing to help control escapement into the Kasilof, the Northern K Beach setters within 600 ft WOULD be fishing". There was no opposing discussion to his statement. This proposal passed the BOF 6-1. The proposal, in 2019, as written was a, "may be allowed", even thou INTENT was given by the BOF to ADF&G to fish NKB 600 ft fishery, when any portion of the Kasilof Section was fishing. The proposal would change the (may) be allowed to a WILL be

allowed. This would give ADF&G guidance, but more importantly help stop exceeding BOF mandated sockeye goals to the Kasilof River.

Oppose Proposal 141:

This proposal seeks to alter the gear in a 145 year old fishery AFTER the management objectives are being met and the ESSN fishery is being managed under the Kenai River Late Run Sockeye Management Plan. This proposal is punitive and ridiculous.

Submitted by: Coley Gentzel
Community of Residence: Anchorage, AK

Hello and thank you for considering my comments regarding a number of issues and proposals currently in front of the Board.

I would first like to comment on the early and late runs of king salmon on the Kenai River. It is now well understood by anyone paying attention that king salmon runs on the Kenai are headed for extinction. Kings on the Kenai have now failed to replace themselves for the last 4 years. The kings are coming back in fewer numbers, smaller sizes, and in age distributions (smaller and younger) than has been documented in the past. All of these things are bad news, and it is unlikely, if not impossible, that the factors affecting this lack of productivity and increased mortality will change anytime soon. The blames and causes are many but the takeaway and needed action is the same regardless of the causes. If we are to save the Kenai kings from seemingly guaranteed functional extinction, we need to take drastic and immediate action to make sure as many kings make it to the spawning gravel as possible for the foreseeable future.

Seeing as how complete and ongoing closures of the in-river fishery and set/drift net fishers for sockeye are a non-starter for many reasons, I would like to voice my strong support for Proposal 83. This proposal advocates for a conservative approach to the in-season management of the king and sockeye fisheries to make better use of in-season run performance before easing restrictions and increasing fishing opportunities. Again, as we are all aware, the model of “start liberal and move to more conservative management if the run doesn’t materialize approach” is not working. Under this model, by the time we realize the run is underperforming, we’ve already killed a meaningful number of king salmon. In the current situation, every large female king salmon plays a hugely important role in the survival of the species. Based on research from last years run, approximately 600 4+ year-old female king salmon returned in the late run. That should shock and horrify anyone who care about saving this run.

The only responsible way to manage the fishery under current conditions is to start closed and allow opportunities to fish both in the river and with nets if the in-season run performance dictates that can be done without unacceptable impact, that is failing to meet the minimum optimum escapement goal. The Board and Department will never be able to make all stakeholders happy, but proposal 83 is about as close as we can come to allowing some opportunity for everyone to fish while giving the kings a decent chance of starting to recover.

Some additional thoughts related to the Kenai. It seems the Board and Department have essentially written off the early run. This genetically special strain of fish is as worthy, if not more so, of protection as the late run. Please consider listing is at a stock of management concern or stock of conservation concern and consider implementing measures to help save this run as well.

Any proposals suggesting that the OEG be lowered (or some other lower metric like SEG be used) for either run of kings on the Kenai should be discarded with haste. The lower end of OEG for the late run, 15,000 fish, in the opinion of many is already irresponsibly low. Our target, at a minimum, should be closer to the higher end of 30,000 fish which is still well below the historic average when the late run was managing to sustain itself with around 50,000 fish coming back each year.

With regard to the impact that set nets have on Kenai kings, one setnet site, the Salamatof site, is responsible for something like 70% of the dead kings in setnets. I understand the State is working on a buy back/buy out system for existing set net permit holders. Please prioritize the Salamatof site as part of this program and in doing so, a huge step towards conserving Kenai kings will have been taken.

One final comment regarding the Kenai king salmon management on the Kenai river, because so many management decisions have traditional been made based on the pre-season forecast, the Board and/or Department needs to review and revise the formula that they use to determine the PSF to line it up with current size/age makeups in the runs from the last handful of years. This is unfortunately the new normal and using

formulas that include unrealistic numbers of 4+ year old fish aren't going to line up with reality in the foreseeable future.

Regarding Proposal 161, setting aside some time for non-guided anglers to fish for sockeye without competition from the guides would be greatly appreciated. As the proposal notes, it has become hard, if not impossible to find a bank fishing spot to fish from due to the high volume of guides fishing sockeye around the clock even for anglers willing and able to fish from very difficult and dangerous spots. Finding a spot suitable for young anglers and anglers with reduced mobility and physical limitations. In many of the spots I have tried to fish with my young children on the Kenai from the bank, I have been harassed by private property owners (while legally fishing) and guides trying to push out of "their" spots. In addition to limiting guides to operating hours of 6am to 6pm, closing the river to guide fishing one day a week would also help provide additional opportunity to anglers who are less willing and able to "compete" with the guide fleet. I support proposal 161.

Thank you.

C. Gentzel

Anchorage, AK

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 83: Support	Proposal 84: Oppose	Proposal 90: Oppose	Proposal 91: Oppose
Proposal 92: Oppose	Proposal 93: Oppose	Proposal 95: Oppose	Proposal 96: Support
Proposal 97: Oppose	Proposal 98: Oppose	Proposal 99: Oppose	Proposal 100: Oppose
Proposal 101: Oppose	Proposal 102: Oppose	Proposal 104: Oppose	Proposal 105: Oppose
Proposal 108: Oppose	Proposal 109: Oppose	Proposal 110: Oppose	Proposal 161: Support

PC93

Submitted by: Coley Gentzel

Community of Residence: Anchorage, AK

Proposal 238, motor size restriction on the Little Susitna River.

I opposed proposal 238 for the following reasons.

1. In the context of juvenile salmon survival and habitat, bank erosion is not an issue of concern on the Little Susitna River. The Little Susitna is not the Kenai river. Suitable riparian habitat for juvenile fish to rear in can be found along almost every inch of the river from salt water to the headwaters. The Little Susitna is a very dynamic volatile system and the condition of the banks changes significantly after every high water event. These changes, though, largely mean more woody debris and organic matter entering the river and adhering to the banks, creating new and different habitat no less suitable than the old habitat. I believe this proposal was submitted from a general understanding or knowledge that on certain rivers, bank erosion is a significant issue, like on the Kenai for example, where riparian habitat is often few and far between and suitable rearing habitat for juvenile fish is easily destroyed and very infrequently created. One cannot simply take this concept from one river to another without looking at the conditions and issues that exist in the new system. If there is an argument to be made for motor and/or boat size restrictions, I think one being based on boater safety might have merit, but the minimal amount of bank erosion happening from boats as a whole on the Little Su, not just boats with larger motors, is not of concern with regard to habitat and salmon spawning productivity.

2. Motor size is only one component of what affects the size and velocity of a boats wake. Restricting only the size of a motor without other total overall weight limits or hull and displacement designs would be relatively meaningless regarding the effect of boats wakes on the bank. High displacement hulls with large V bows and boats that “plow” and “dredge” often throw a much bigger wake than a shall displacement hull with a flat bottom and light V with larger motors. If the Board considers this an issue of concern with regard to bank erosion, which again I don’t think that it is, they would be better served to look at things like overall vessel weight restrictions, inboard vs. outboard restrictions, or hull design restrictions, all of which seem like they would be very difficult to both regulate and enforce. My 16’ drift boat with a 2.5hp outboard throws a much larger wake at 5mph than my 20’ flat bottomed jet boat with a 140hp outboard does at 35mph. That is a simple, easily observed fact.

The operator of a boat also plays a large part in wake formation based on speed and maneuvering. Other than speed limit, those behaviors are functionally impossible to regulate and enforce. In my opinion, if there are problems with boats on the Little Su, they could be summed up as “big boats going too fast,” and again this is a boating safety issue rather than a habitat issue and motor size would do little to change that situation.

Thank you for the consideration.

C. Gentzel

Anchorage, AK



Proposal 238: Oppose

Hello and thank you for considering my comments regarding a number of issues and proposals currently in front of the Board.

I would first like to comment on the early and late runs of king salmon on the Kenai River. It is now well understood by anyone paying attention that king salmon runs on the Kenai are headed for extinction. Kings on the Kenai have now failed to replace themselves for the last 4 years. The kings are coming back in fewer numbers, smaller sizes, and in age distributions (smaller and younger) than has been documented in the past. All of these things are bad news, and it is unlikely, if not impossible, that the factors affecting this lack of productivity and increased mortality will change anytime soon. The blames and causes are many but the takeaway and needed action is the same regardless of the causes. If we are to save the Kenai kings from seemingly guaranteed functional extinction, we need to take drastic and immediate action to make sure as many kings make it to the spawning gravel as possible for the foreseeable future.

Seeing as how complete and ongoing closures of the in-river fishery and set/drift net fishers for sockeye are a non-starter for many reasons, I would like to voice my strong support for Proposal 83. This proposal advocates for a conservative approach to the in-season management of the king and sockeye fisheries to make better use of in-season run performance before easing restrictions and increasing fishing opportunities. Again, as we are all aware, the model of “start liberal and move to more conservative management if the run doesn’t materialize approach” is not working. Under this model, by the time we realize the run is underperforming, we’ve already killed a meaningful number of king salmon. In the current situation, every large female king salmon plays a hugely important role in the survival of the species. Based on research from last years run, approximately 600 4+ year-old female king salmon returned in the late run. That should shock and horrify anyone who care about saving this run.

The only responsible way to manage the fishery under current conditions is to start closed and allow opportunities to fish both in the river and with nets if the in-season run performance dictates that can be done without unacceptable impact, that is failing to meet the minimum optimum escapement goal. The Board and Department will never be able to make all stakeholders happy, but proposal 83 is about as close as we can come to allowing some opportunity for everyone to fish while giving the kings a decent chance of starting to recover.

Some additional thoughts related to the Kenai. It seems the Board and Department have essentially written off the early run. This genetically special strain of fish is as worthy, if not more so, of protection as the late run. Please consider listing is at a stock of management concern or stock of conservation concern and consider implementing measures to help save this run as well.

Any proposals suggesting that the OEG be lowered for either run of kings on the Kenai should be discarded with haste. The lower end of OEG for the late run, 15,000 fish, in the opinion of many is already irresponsibly low. Our target, at a minimum, should be closer to the higher end of 30,000 fish which is still well below the historic average when the late run was managing to sustain itself with around 50,000 fish coming back each year.

With regard to the impact that set nets have on Kenai kings, one setnet site, the Salamatof site, is responsible for something like 70% of the dead kings in setnets. I understand the State is working on a buy back/buy out system for existing set net permit holders. Please prioritize the Salamatof site as part of this program and in doing so, a huge step towards conserving Kenai kings will have been taken.

One final comment regarding the Kenai king salmon management on the Kenai river, because so many management decisions have traditional been made based on the pre-season forecast, the Board and/or Department needs to review and revise the formula that they use to determine the PSF to line it up with current size/age makeups in the runs from the last handful of years. This is unfortunately the new normal and using formulas that include unrealistic numbers of 4+ year old fish aren't going to line up with reality in the foreseeable future.

Regarding Proposal 161, setting aside some time for non-guided anglers to fish for sockeye without competition from the guides would be greatly appreciated. As the proposal notes, it has become hard, if not impossible to find a bank fishing spot to fish from due to the high volume of guides fishing sockeye around the clock even for anglers willing and able to fish from very difficult and dangerous spots. Finding a spot suitable for young anglers and anglers with reduced mobility and physical limitations. In many of the spots I have tried to fish with my young children on the Kenai from the bank, I have been harassed by private property owners (while legally fishing) and guides trying to push out of "their" spots. In addition to limiting guides to operating hours of 6am to 6pm, closing the river to guide fishing one day a week would also help provide additional opportunity to anglers who are less willing and able to "compete" with the guide fleet.

Thank you.

C. Gentzel
Anchorage, AK

██████████@██████████

Proposal 238, motor size restriction on the Little Susitna River.

I opposed proposal 238 for the following reasons.

1. In the context of juvenile salmon survival and habitat, bank erosion is not an issue of concern on the Little Susitna River. The Little Susitna is not the Kenai river. Suitable riparian habitat for juvenile fish to rear in can be found along almost every inch of the river from salt water to the headwaters. The Little Susitna is a very dynamic volatile system and the condition of the banks changes significantly after every high water event. These changes, though, largely mean more woody debris and organic matter entering the river and adhering to the banks, creating new and different habitat no less suitable than the old habitat. I believe this proposal was submitted from a general understanding or knowledge that on certain rivers, bank erosion is a significant issue, like on the Kenai for example, where riparian habitat is often few and far between and suitable rearing habitat for juvenile fish is easily destroyed and very infrequently created. One cannot simply take this concept from one river to another without looking at the conditions and issues that exist in the new system. If there is an argument to be made for motor and/or boat size restrictions, I think one being based on boater safety might have merit, but the minimal amount of bank erosion happening from boats as a whole on the Little Su, not just boats with larger motors, is not of concern with regard to habitat and salmon spawning productivity.
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Thank you for the consideration.

C. Gentzel
Anchorage, AK

██████████@██████████

February 12, 2024

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

Dear Board of Fisheries,

I participate in subsistence, commercial, and sport fisheries in Cordova, Alaska. I support the removal of Proposal 59, and I oppose Proposal 43.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

- (1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
- (2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
- (3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Darin Gilman

[REDACTED]

Cordova, AK

February 8, 2024

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

Dear Board of Fisheries,

I'm a commercial fisherman in Cordova, Alaska. The hatchery system has kept my business viable through 40 years of ups and downs.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,

John Grocott



Cordova, Alaska

Submitted by: Grant Gullicks
Community of Residence: Chugiak, AK

All effort must be taken to help King salmon populations rebound. Management should be for the betterment of the resource, NOT the user groups. King salmon have been on the decline for over a decade and nothing has been done. Management efforts up to this point have not been adequate. A dead King salmon is a dead King salmon, all bycatch from commercial trawlers and other fishing must be counted towards any intended harvest quotas for all users, especially the commercial fleet. We must all do our part, but regulations on the smallest users groups accomplish nothing. The largest user group has the largest impact. We must act before it is too late. Over harvest and missing minimum escapement goals is not acceptable. We must start out conservative and only once escapement goals have been met should any harvest be considered. I have voted with this in mind.

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|-----------------------|-----------------------|-----------------------|-----------------------|
| Proposal 1: Support | Proposal 2: Oppose | Proposal 3: Support | Proposal 43: Support |
| Proposal 75: Oppose | Proposal 76: Oppose | Proposal 77: Oppose | Proposal 78: Oppose |
| Proposal 79: Oppose | Proposal 80: Oppose | Proposal 81: Oppose | Proposal 82: Oppose |
| Proposal 83: Support | Proposal 84: Support | Proposal 85: Oppose | Proposal 86: Oppose |
| Proposal 87: Oppose | Proposal 88: Oppose | Proposal 89: Oppose | Proposal 90: Support |
| Proposal 91: Oppose | Proposal 92: Oppose | Proposal 94: Support | Proposal 95: Support |
| Proposal 96: Support | Proposal 97: Oppose | Proposal 98: Oppose | Proposal 99: Oppose |
| Proposal 100: Oppose | Proposal 101: Oppose | Proposal 102: Oppose | Proposal 103: Oppose |
| Proposal 104: Oppose | Proposal 105: Oppose | Proposal 106: Support | Proposal 107: Support |
| Proposal 108: Oppose | Proposal 109: Oppose | Proposal 110: Oppose | Proposal 111: Oppose |
| Proposal 112: Support | Proposal 113: Oppose | Proposal 114: Oppose | Proposal 115: Oppose |
| Proposal 116: Oppose | Proposal 117: Oppose | Proposal 118: Oppose | Proposal 119: Oppose |
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| Proposal 132: Oppose | Proposal 133: Oppose | Proposal 134: Oppose | Proposal 135: Support |
| Proposal 136: Support | Proposal 137: Support | Proposal 138: Oppose | Proposal 139: Oppose |
| Proposal 140: Oppose | Proposal 141: Support | Proposal 142: Support | Proposal 143: Oppose |
| Proposal 144: Oppose | Proposal 145: Oppose | Proposal 146: Support | Proposal 147: Support |
| Proposal 148: Oppose | Proposal 149: Oppose | Proposal 150: Support | Proposal 151: Oppose |
| Proposal 152: Oppose | Proposal 153: Oppose | Proposal 154: Oppose | Proposal 155: Oppose |
| Proposal 156: Oppose | Proposal 157: Oppose | Proposal 158: Oppose | Proposal 159: Oppose |
| Proposal 160: Support | Proposal 161: Support | Proposal 162: Oppose | Proposal 163: Support |
| Proposal 164: Support | Proposal 165: Support | Proposal 166: Support | Proposal 167: Support |
| Proposal 168: Oppose | Proposal 169: Support | Proposal 170: Oppose | Proposal 171: Support |
| Proposal 172: Support | Proposal 175: Support | Proposal 182: Oppose | Proposal 185: Support |
| Proposal 189: Support | Proposal 190: Support | Proposal 191: Support | Proposal 192: Oppose |
| Proposal 193: Support | Proposal 194: Oppose | Proposal 197: Support | Proposal 200: Support |
| Proposal 201: Oppose | Proposal 202: Support | Proposal 204: Oppose | Proposal 205: Support |
| Proposal 206: Support | Proposal 207: Support | Proposal 208: Support | Proposal 209: Support |
| Proposal 210: Support | Proposal 211: Oppose | Proposal 212: Support | Proposal 214: Oppose |
| Proposal 215: Oppose | Proposal 218: Oppose | Proposal 219: Support | Proposal 221: Support |
| Proposal 224: Support | Proposal 229: Oppose | Proposal 239: Oppose | Proposal 240: Oppose |
| Proposal 241: Oppose | Proposal 242: Oppose | Proposal 243: Support | Proposal 251: Oppose |
| Proposal 252: Support | Proposal 255: Oppose | | |
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Submitted by: Brian Harrison
Community of Residence: Homer, AK

I strongly oppose any further manipulation of the Kenai river escapement goals as proposed by KRSA in proposal #112. The only acceptable change would be to adopt one goal of 700,000-1,000,000 no matter the run size.

I strongly support proposal #122 that would repeal the 1% rule for the drift fishery. With the Kenai river repeatedly having strong escapement in August, it makes no sense to prevent the harvest of these surplus stocks in August. Allowing the drift fishery to continue through August 15th would provide an opportunity to harvest these surplus stocks that have continually led to over escapement of their Kenai river.

Tidal fluctuations often leads to several days of little fish movement into the river, followed by large numbers a short time later. Openings that happen on those slow days may trigger the 1% rule only to have a large harvestable surplus move into the river after the closure. Allow F&G to manage by abundance and remove the obstacles that keep them and the fleet on the sideline.

- Proposal 112: Oppose Proposal 113: Support With Amendments Proposal 114: Support With Amendments
- Proposal 115: Support With Amendments Proposal 118: Support With Amendments
- Proposal 120: Support With Amendments Proposal 121: Support With Amendments Proposal 122: Support With Amendments
- Proposal 123: Support With Amendments Proposal 124: Support With Amendments
- Proposal 125: Support With Amendments Proposal 127: Support With Amendments
- Proposal 144: Support With Amendments Proposal 145: Support With Amendments Proposal 149: Support With Amendments
- Proposal 150: Oppose Proposal 152: Support With Amendments
- Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose
- Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Oppose Proposal 160: Oppose
- Proposal 161: Support Proposal 162: Oppose Proposal 164: Support Proposal 165: Support
- Proposal 169: Oppose Proposal 171: Oppose Proposal 175: Support Proposal 177: Support
- Proposal 189: Support Proposal 190: Support Proposal 191: Support Proposal 192: Support
- Proposal 194: Oppose Proposal 196: Support Proposal 197: Support Proposal 198: Support
- Proposal 199: Support Proposal 200: Support Proposal 201: Support Proposal 203: Oppose

Submitted by: Ryan Hatt
Commercial fishermen

Community of Residence: Soldotna

I would like to talk about substance fishing at mouth of kasilof river with nets. [redacted] adfg official will talk about historical avg because that fits his narrative ask for the 5 year avg the last time it was open 2years ago 20 sumthing kings caught with an unknown amount of kenai kings salmon even less large ones possibly one to 3. He also can close it when he wonts he just wonts to hide behind board of fish. If this is closed there has to be serious talk about closing dippnetting in the mouth of kenai which are for sure catching kenai kings. Take that avg then double it cause there now open 24 when the historical avg was only 12 hrs a day. Those hatchery kings are for everyone not just the guides.

Proposal 200: Oppose

Submitted by: Richard Hoffman
Community of Residence: Minnesota

I'm supporting Proposal 83....thank you

Proposal 83: Support

ALASKA BOARD OF FISHERIES 2023-2024 PROPOSAL 203 KASILOF RIVER DIP NET FISHERY MARINE BOUNDARY

Davin Holen

[REDACTED]
Anchorage, AK [REDACTED]
[REDACTED]

On July 27, 2022, around 2:00 PM in the afternoon, 3 hours from high tide, Alaska State Trooper Wildlife Enforcement cited a number of us on the beach fishing the south shore of the Kasilof River in the personal use dip net fishery. According to regulation, the Wildlife Troopers were correct in their citation. However, the map provided with the personal use permit shows a different area (Figure 1). We were fishing according to the map provided with the permit. At low tide, we were fishing well east of the south shore regulatory marker. However, if you drew a straight line between the two orange markers, we were just over the line at a moderate low tide. I would say around 20 people were cited. Most were a few yards over the boundary.



Figure 1. Map on permit

This short summary describes my confusion and the fact that members of the public would be confused as well, not only by the map provided but by the location of the regulatory markers that create a diagonal line across the mouth of the Kasilof River. On the permit, the area shown to be open to fishing extends past the regulatory marker on the south shore. I assume this is to account for low tide if I remember correctly from past Board of Fisheries meetings. It's difficult to fish too close to the south shore marker

as there is silt and high wave action as the tide comes in. In the 15 consecutive years I've fished this location, I've rarely seen anyone fish close to the south shore marker except at low tide.

The Wildlife Troopers I spoke with mentioned that it is difficult to see who is over the line. The only time it's an issue is at low tide. Once the tide is coming in, no one fishes that far west towards the south shore marker; everyone on the south shore is well east of the boundary formed by the markers at the mouth of the Kasilof River. The Troopers noted that to identify who was out of bounds, they walked over to the south shore marker and put their thumb up, making a straight line, and picked out everyone on the west side of the imaginary line between markers. The problem lies in that the regulatory line is not a straight line extending from the mouth of the river on the south shore to the mouth of the river on the north shore as it appears on a map, but a diagonal line that is difficult to track both in the water as well as from the shore. After taking their thumbs eye view of the line, once the troopers got down to the water, everyone had moved, including the person they were using as a reference, so it was difficult to identify who was actually on the wrong side. They just called everyone remotely near the line out of the water and gave us all citations. I want to note that I appreciate the professionalism of the Wildlife Trooper whom I spoke with, and we had a good conversation about the regulations for this fishery. The trooper informed me that they were also frustrated and it would help to have more clear guidance for fishers. However, they were directed to issue citations.

Figure 2 shows the map on the permit, and I drew a line that reflects the actual line in regulation. Figure 3 shows the approximate location I was fishing using a GPS marker, and Figure 4 shows an image from the area of how far inside the boundary from the south shore marker I was.

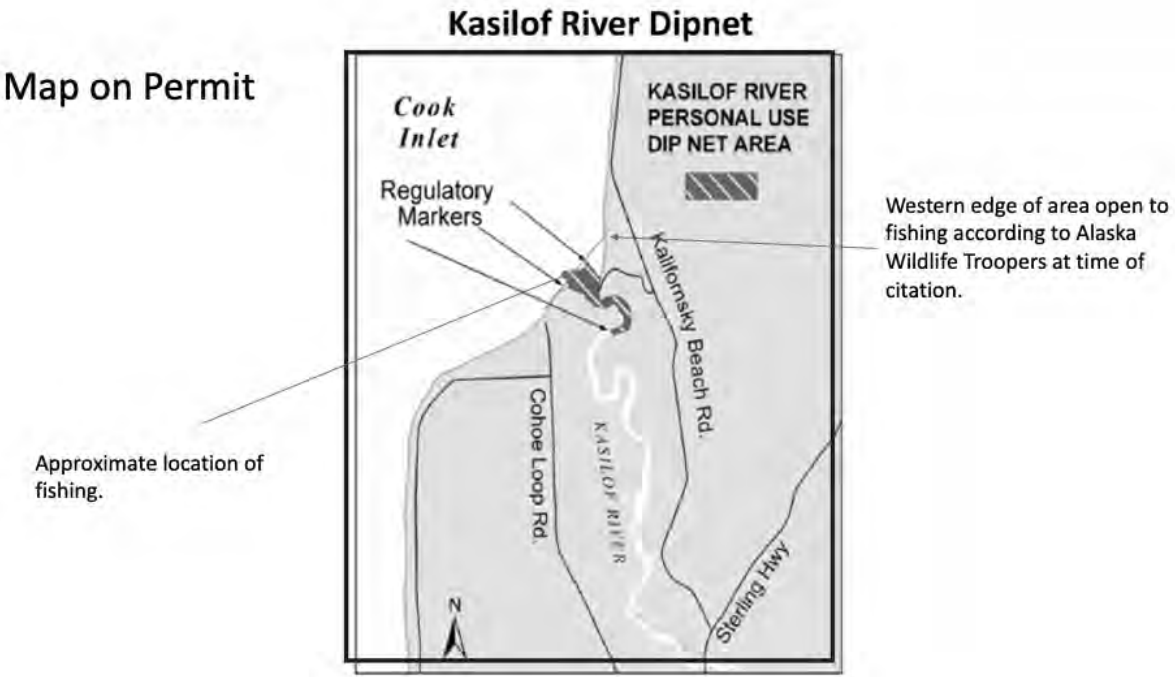


Figure 2. Map on permit with regulatory line, 2022

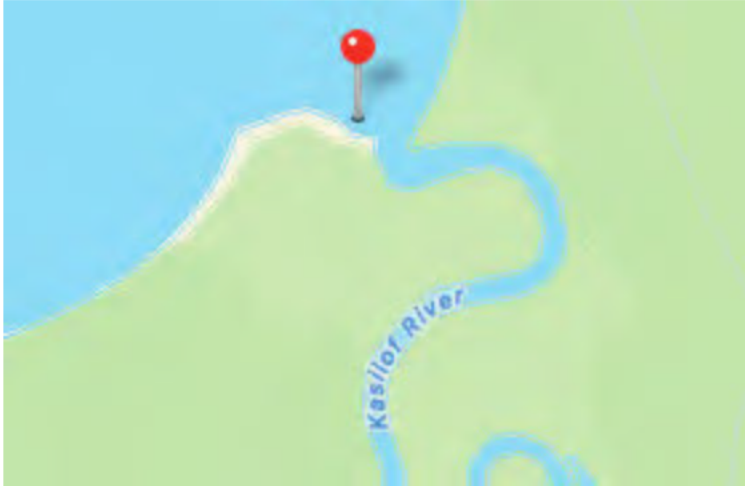


Figure 3. GPS Location Taken at Time of Citation



Figure 4. Approximate Location at Time of Incident: South Shore Marker in the Distance to the West, Marker outlined.

I'm an anthropologist and faculty member in the University of Alaska Sea Grant Marine Advisory Program. Prior to this, I spent 15 years working for the Alaska Department of Fish and Game (ADF&G), Division of Subsistence. From 2010 – 2015, I was the regional program manager for southern Alaska. I attended 5-7 Board of Fisheries and Game meetings yearly, providing reports and presentations to the Boards so they could make informed decisions. I am very familiar with the big green book of regulations. However, even with this knowledge, I was unaware that the map provided on the permit was not the same as the regulatory language. Following the citation, I did some digging to find the regulatory language on the ADF&G website. It took me about 10 minutes to find a map that reflected the language in regulation. A search for the regulations was not working; I had to use my knowledge of the website to find the regulatory language. The only reason I know how to find the language and the map that actually reflects the regulatory language is that I was part of a team that designed the ADF&G website. Figure 5 shows the map I finally found, and I was able to pull up the regulatory language. This language and map were not consistent with the map provided on the permit in 2022. If I, with all my knowledge of regulations and the design of the ADF&G website, could only with difficulty find the correct regulation and map, how is a reasonable person supposed to know where to look and that the map provided is incorrect? In my case, the judge had no choice but to uphold the citation and told me that I should not trust the information on the permit and that I, as a citizen, should do more research to ensure I was compliant with the regulation.

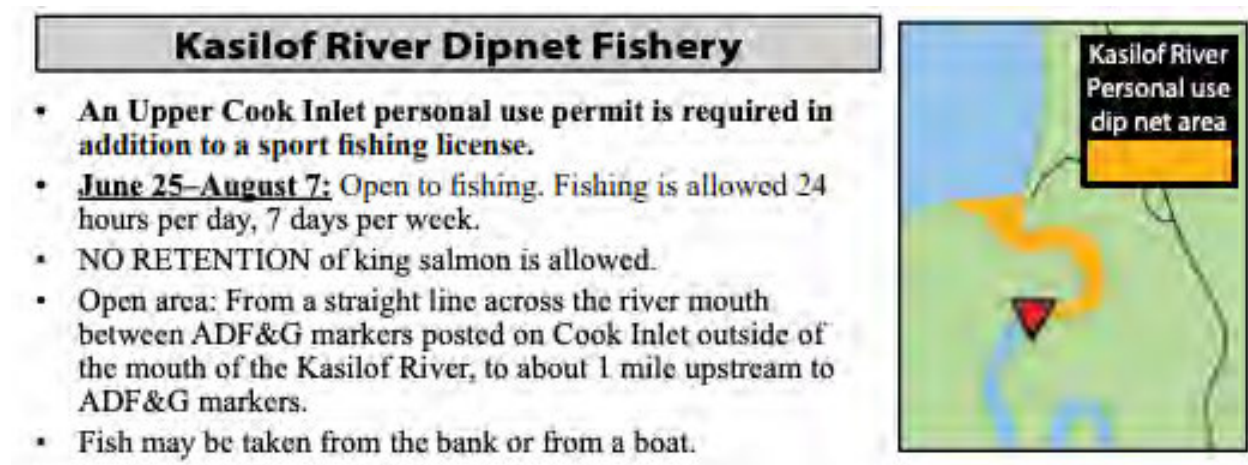


Figure 5: Regulatory Map

REGULATION:

5 AAC 77.540. Upper Cook Inlet Personal Use Salmon Fishery Management Plan

(c.2.C) from a line between ADF&G regulatory markers outside the terminus of the river on the north shore beach at 60° 23.25' N. lat., 151° 17.98' W. long., and on the south shore beach at 60° 23.27' N. lat., 151° 18.64' W. long., upstream for a distance of one mile.

The Kasilof River is important for my family to fish each year. Our son, who is in college now, grew up fishing annually on this beach. We all look forward to it each summer, and we enjoy the salmon all winter. As multi-generational Alaskans, this activity is part of who we are.

A few years back, I helped design an internship as part of our national program for undergraduate students to encourage young people from underrepresented populations to get into the marine and coastal sciences. In the summer of 2022, I hosted a fellow as part of this program and her project for the summer was to conduct research on the social and economic benefits of community gardens and wild resource harvesting activity in Southcentral Alaska for underrepresented populations. A significant focus for us was the dip net fishery for families in Southcentral Alaska. Anchorage is one of the most diverse communities in the United States, hosting 3 of the top 5 most diverse high schools in the US. While my student was with her extended family on their annual multi-day salmon harvesting trip to the Kasilof River, she conducted informal interviews with diverse participants at the beaches in Kenai and Kasilof. My student had great conversations with participants who represent the diversity of our Southcentral Alaska populations that use the fishery as a communal family activity and for food security. Some of her respondents migrated to Anchorage from rural Alaska and many parts of the world as migrants and refugees. The fishery helps to connect them to the place. It provides an opportunity to do a healthy activity with their family. It also provides food security and healthy food for their families. In my many years of research as a fisheries anthropologist working in rural Alaska interviewing commercial, sport, and subsistence fishers, these are the same reasons other Alaskans participate in fishing. There are so many benefits of this fishery to Southcentral Alaska residents that go beyond putting salmon in jars and the freezer.

What is unfortunate is a lot of the people I saw cited and talked to after really can't afford the \$220 citation. They were fishing to provide for their families. The look of shock on their faces as they lined up to get their citations was really uncomfortable to see. I can afford the citation. I can take time out to go to court. This proposal isn't about me.

I contacted the area manager and others in the Department, and they encouraged me to write a proposal once I got through the court appeal. The map on the permit was also fixed. In the summer of 2023, I received an updated permit with the correct map (Figure 6). The problem is that the map and the actual mouth of the river do not line up. The marker on the south shore is near the mouth of the river. It's in the correct location. It's very difficult for a dip net fisher to get close to the mouth on the south shore due to the wave action, except at low to medium tide. Figure 4 shows how far east of the marker up the river I was at the time of the citation. The marker on the north shore is well east of the mouth of the river. This means there is a diagonal line across the mouth, and it's difficult to track where you are while fishing, both in the water and from the shore. This makes it difficult for both the fisher and enforcement. I am requesting to move the north shore marker closer to the actual mouth of the river, creating a straight line across the mouth of the river. Most likely, this would not impact north shore fishers as it is too muddy to get too close to the mouth. Most fishers on that side stay well clear of the mouth due to the steep slope of the bank and the silt. Moving the boundary west to align with the mouth of the river would also make a straight line for dip net fishers from boats. The intent of this proposal is to create a fishery boundary that is clear to the fisher and easier to enforce. A reasonable person should easily be

able to identify whether they are in an area open to fishing based on the information they are provided and the boundary markers, and it should be very clear where the boundary is for enforcement.



Figure 6. Map on Permit, 2023