

From: Cook Inlet Fisherman's Fund, Inc.
PO BOX 39408
Ninilchik, Alaska 99639
Ph. 907-252-2752

Dear Legislators;

February 18, 2024

Cook Inlet Fisherman's Fund is shocked to see that our comments submitted through the LIO in Kenai on Monday February 12th prior to the House Fisheries Committee meeting on HB 195/SB 82. As an organization representing over four hundred set and drift gillnet permit holders, processors and ancillary persons engaged in the fishery in Representative Vance's District we feel that our concerns should be heard. We are opposed to this bill mostly out of concern about what it does to CFEC and to the fishery that remains in Cook Inlet. Reducing the open waters, changing the area the permit can fish in after this bill passes will be challenged in court, especially since 300 permits that currently do not fish in the ESSN fishery, do not get to vote on the buyback but their permits will forever be devalued. The permits that remain on the Eastside (60 %) receive no benefit because one of the stated purposes of this bill is **to put more fish into the Kenai River**. The escapement goals are inflated above MSY levels and for Kenai Kings **the goal is for part of a stock which violates BOF regulations** for escapement goals. Only kings greater than 75 cm (34 inches), mid eye to tail fork are counted which means that in 2023 over forty-six percent (46.6 %) of the run was not counted (Figure1). **This single goal for large king salmon in the Kenai River is what is creating the fisheries disasters you are supposedly trying to fix**. Rather than break CFEC, fix the Kenai King Salmon escapement goal. When all kings are included, as was the practice from 1986-2017, the escapement goal would not have been missed on the lower end, **ever** (Figure 2)! In 19 out of 37 years, the upper end of the escapement goal was exceeded and as one with any biological training would expect the future production from those over-escapements plummet, which is what we are now experiencing. The sonar counts from 1986-2013 were found to be inaccurate, missing 30 percent of the fish. From 2013 to now, there has been no verification of these new sonar counts, which ignore 46.6 percent of the fish. The biological insanity of ignoring a substantial part of the 3, 4 and 5-year-old components of the run as if they don't spawn is irresponsible. Rather than fix something that is not broken, we suggest that you **fund an independent study into the Department's escapement goals and mismanagement** that is not sustained yield management as required. This independent review could be done for the price of a handful of permits at \$260,000 and CIFF has a proposal done by the University to do this very review. Thank you for your consideration in this matter and please see our earlier comments on HB 195.

Sincerely,
John McCombs, CIFF President

Counting Kings 750 mm and larger omits all fish smaller than 34 inches, all age 3,(1.1) age 4,(1.2) and 40 % age 5 (1.3)

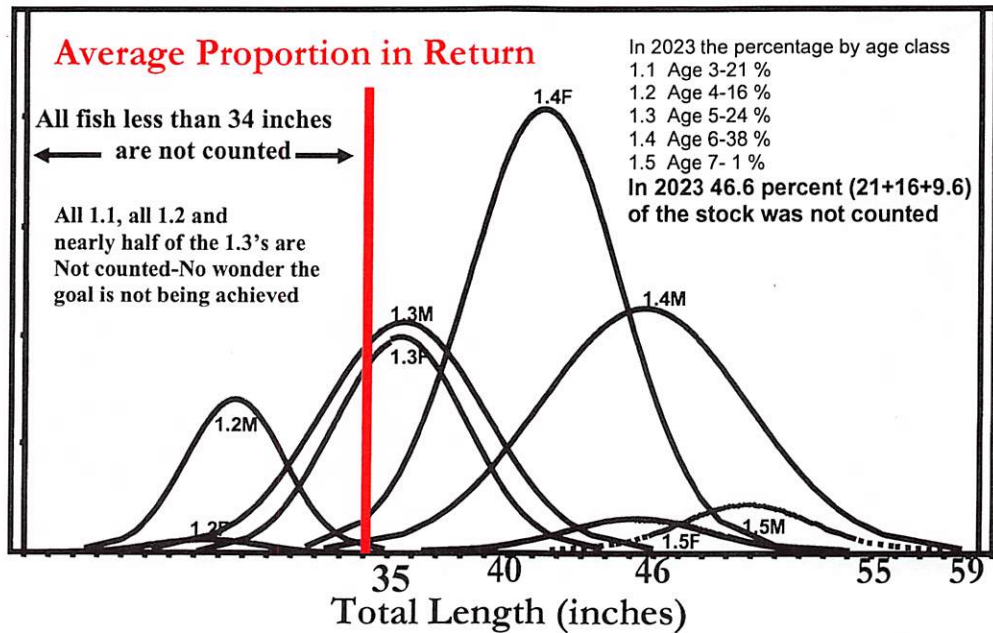


Figure 2. Kenai King Escapement of All Sized Kings- SEG is 15,000-30,000 Kings of all Sizes from 2013 Report FMS 13-02, in Effect Prior to 2017, Data Updated to 2022.

