

This is a Petition not a Record Copy

Petition to the Alaska Board of Fisheries

I am petitioning the Alaska Board of Fisheries under 5 AAC 96.625 and AS 44.62.220 to list Kenai River Sockeye Salmon as a “Stock of Management Concern”, because the Department has repeatedly failed to maintain escapements for this salmon stock **within the bounds of the in-river goal or the SEG** as required and has continued to overescape this stocks escapement needs wasting millions of sockeye salmon. I understand their reluctance to bring this embarrassment to your attention but urgent action is needed immediately to prevent this embarrassing waste of fish. In the 56 years that the Department has been managing this stock, 34 years are above the goal range, 13 within and 9 below. (Figure 1) In the last 24 years, **since 2000, only 4 years are within the goal range**, all other years are in excess except two, and in the last 5 years grossly in excess, of the goal range. This is caused by the Boards management plans that are in conflict and restrict the commercial fishery beyond any prudent standard or level that prevent the management of this stock to reasonable scientific standards. Under your own regulation, 5 AAC 39.222, Policy for the management of sustainable salmon fisheries,

(f) (21) *"management concern" means a concern arising from a **chronic inability**, despite use of specific management measures, to maintain **escapements for a salmon stock within the bounds of the SEG, BEG, OEG, or other specified management objectives for the fishery**; a management concern is not as severe as a conservation concern;*

*(f)(5) **"chronic inability"** means the **continuing or anticipated inability to meet escapement thresholds over a four to five year period**, which is approximately equivalent to the generation time of most salmon species*

In regulation 5 AAC 39.223. Policy for statewide salmon escapement goals *“(a) **The Department of Fish and Game (department) and the Board of Fisheries (board) are charged with the duty to conserve and develop Alaska's salmon fisheries on the sustained yield principle. There-fore, the establishment of salmon escapement goals is the responsibility of both the board and the department working collaboratively.**”*, The management objectives and escapement goal for the Kenai River Sockeye return has been exceeded in each of the last 5 years in a row by 100,000’s of fish. The results of this **chronic inability** to manage this return, do not meet the Sustained Yield Principle mandate in the State of Alaska Constitution and violates your own standards in 5 AAC 39.2225 and AAC 39.223. Since the Department failed to bring this to your attention a petition is required to raise this Conservation Concern that must be addressed during the ongoing UCI BOF meeting so that the management of this stock can be brought back into the confines of the Sustained Yield mandate in the Constitution and your own Sustainable Salmon Fisheries and escapement goal policies. Thank you for you attention to this matter.

Jeff Fox

Soldotna

Figure 1. Kenai Sockeye Salmon Escapement, 1968 to 2023.

