

## 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 Kasilof 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 BEG or OEG** as required and has continued to overescape this stocks escapement needs to levels that sustained yield is now in question. I understand their reluctance to bring this embarrassment to your attention but urgent action is needed immediaqtely. In the 56 years that the Department has been managing this stock, 35 years are above the goal range, 16 within and 5 below.(Figure 1) In the last 24 years, **since 2000, only 4 years are within the goal range**, all other years are in excess, and in the last 6 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 escapement goal for the Kasilof Sockeye return has been exceeded in each of the last 7 years in a row. The results of this **chronic overescapement** 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. (Figure 2) 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. Kasilof Sockeye Salmon Escapement, 1968 to 2023.

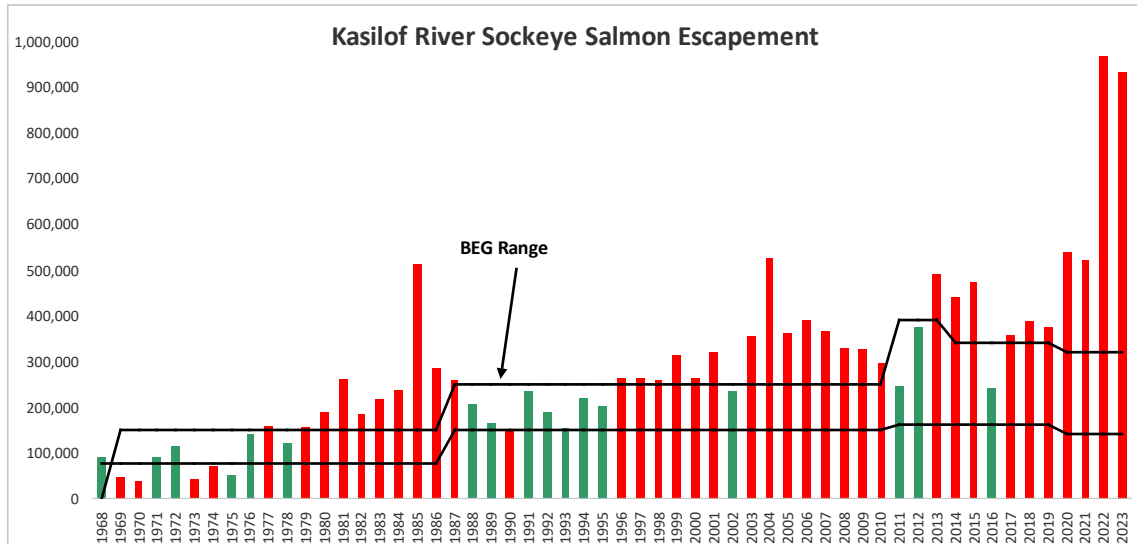
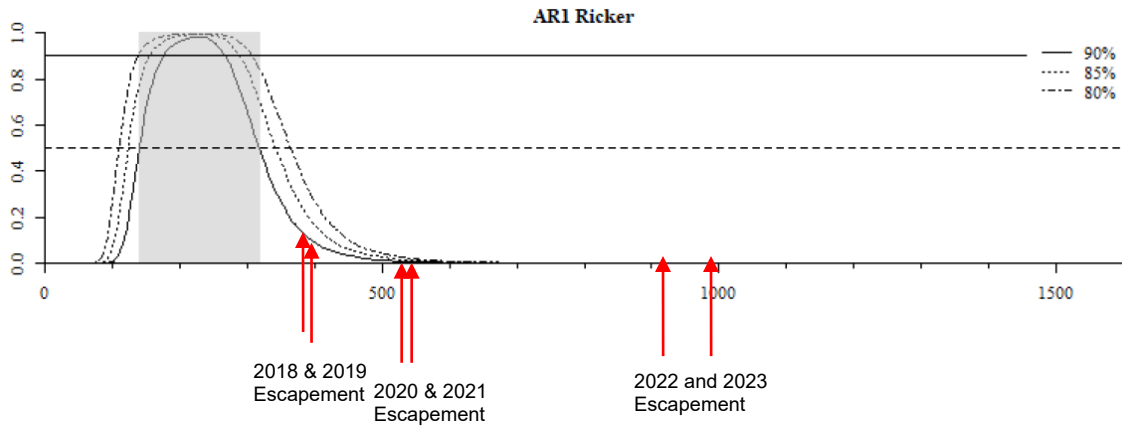


Figure 2. Kasilof River Sockeye Optimum Yield Profiles from McKinley et al 2019. FMS No. 20-02 P.41



MSY for Kasilof Sockeye is 688,000 per year from this model  
 Projected future yield from 2018 and 2019 is less than 100,000 per year or a 85 percent reduction per year from MSY.  
 Projected future yield from 2020, 2021, 2022 & 2023 is **ZERO** per year or a 100 percent reduction per year.

This is not sustained yield management as required by the Alaska Constitution, Statutes, or regulations 5 AAC 39.222 and 5 AAC 39.223. There is no projected Yield, or Harvest available in 4 of the next 6 years. The same is likely true for Kenai Sockeye however the report (FMS No. 20-02) does not contain a yield curve for the stock, nor does the goal for this stock withstand scientific scrutiny and has not been peer reviewed outside ADF&G, for good reason.

