

02.23.24

Alaska Board of Fisheries

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Juneau, AK 99811-5526

Chairman Wood,

My name is Paul A. Shadura II. I reside within the Kalifornsky village area of the Kenai Peninsula. I have been an Upper Cook Inlet setnet salmon license and permit holder since 1969. I am a member of the Kenaitze Indian Tribe (KIT). I serve on various local boards and seek to represent the common interests and support of the local community.

I am the author of proposal-petition 99, 139 and 140.

Today I would like to talk about the public's need to understand the regulatory process as it relates to the management of Cook Inlet salmon stocks, of primary interest, the Kenai River Late Run King Salmon.

For guidance, members of the public review: 5 AAC 39.222. Policy for the management of sustainable salmon fisheries.

There has been confusing definitions of the term Sustainable Escapement Threshold (SET).

Threshold may be defined as "Maximum limit allowed or accepted minimum" *Blacks's Law*.

(f)(39) "sustained escapement threshold" or "(SET)" means a threshold level of escapement below which the ability of the salmon stock to sustain itself is jeopardized; in practice, SET can be estimated based on lower ranges of historical escapement levels, for which the salmon stock has consistently demonstrated the ability to sustain itself; the SET is lower than the lower bound of the BEG and lower than the lower bound of the SEG; the SET is established by the department in consultation with the board, as needed, for salmon stocks of management or conservation concern;

The public, prior to this meeting, have requested from the Department, a clear definition in application as it relates to the "special Publication No. 23-11". I do not believe that the "Board" has been "consulted" in this process judging from the questions members of the Board have made at this meeting.

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 principles. Therefore, the establishment of the salmon escapement goals is the responsibility of both the board and the department working collaboratively. The purpose of this policy is to establish the concepts, criteria, and procedures for establishing and modifying salmon escapement goals and to

establish a process that facilitates public review of allocative issues associated with escapement goals.

(b) The Board recognizes the departments responsibility to

(b)(4) establish sustained escapement thresholds (SET) as provided in 5 AAC 39.222 (Policy for the Management of Sustainable Salmon Fisheries);

(c) In recognition of its joint responsibilities, and in consultation with the department, the board will

(c)(2) during its regulatory process, review a BEG, SEG, or SET determined by the department and, with the assistance of the department, determine the appropriateness of establishing an optimal escapement goal (OEG); the board will provide an explanation of the reasons for establishing an OEG and provide, to the extent practicable, and with the assistance of the department, an estimate of expected differences in yield of any salmon stock, relative to maximum sustained yield, resulting from implementation of an OEG.

In the “escapement goal policy”, SET is referred to in 7 different provisions. Within the “SSFP”, addressed in 3 provisions.

For reference, the federal fisheries management system applies a slightly different definition of the sustainable fisheries. They apply a different calculation to maintain a lower bar of harvests to maintain sustained yields. The default for both State management and Federal management, as defined in the Magnuson Stevens Conservation Act (MSA) is to achieve Maximum Sustained Yield (MSY).

Minimum stock size threshold (MSST) is defined for stocks with escapement goals as one half of the sum of the stock’s spawning escapement goal summed across a generation. MSST is compared with cumulative escapement summed across the most recent generation to assess whether a stock has been overfished (postseason estimates) or is approaching an overfished condition (preseason estimates). See “Overfished” definition. *January 2024 DRAFT- SAFE report for the CIEEZA.*

In conclusion, I would request the Board and the Department to comply with current regulations to better inform the public on the process and the definitions to properly deliberate SET’s as they relate directly to Stocks of Concern (SOC) and Escapement Goal(s) (EG).

I would also direct the Board and the Department to give sufficient time to discuss the Petition brought forward in RC17.

Thank you,

Paul A. Shadura II

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