02.29.24

To: ABOF UCI Regulatory Meeting

Chairman Wood,

SOKI would like to comment and suggest changes to this RC 169.

**Responses by Page-**

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We disagree with the implementation of an OEG that is not currently achievable with current sustained yields. Continuing an unachievable goal is contrary to 5 AAC 39.223. Policy for statewide salmon escapement goals. (a) The Department of Fish and Game (department) and the Board of Fisheries 9board) are charged with the duty to conserve and develop Alaska's salmon fisheries on the sustained yield principle. Therefore, the establishment of 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.

There is no presented information that would substantiate any future increases in numbers of LRKRK. In fact, current data for the last cycle would argue that the current OEG is practically Un-attainable within current fresh water and ocean conditions. Based on current sustained escapements, the biological escapement goal should be modified to reflect the "sustained yield". This is the normal process that the department usually performs at regularly cycled meetings. In Cook Inlet, even though recent returns would indicate otherwise, the department has chosen not to modify the current goal range of 13,500 to 27,000.

We oppose language that acknowledges one species or area escapement goal and ignores all other goals. We believe that a balanced approach is more important to the sustainability of the resource and coastal community. Board members should not direct the department to ignore all other stocks of salmon while managing for one "allocative" goal which may be unreasonable or technically improbable to attain.

Therefor we do not accept the increase to 18,000 as a maximum sustained yield (Smsy) as the departments escapement goal planning team (EGPIT) has determined that to achieve MSY, any escapement within the SEG range will return a sustained yield. The department rarely manages on a point goal as the degree of accuracy with all natural and manmade conditions incorporated in their escapement goal modeling could not be that accurate. The LRKRK is not managed on a Biological Escapement Goal (BEG) because there is not enough data to support such accuracy or predictability. Clearly, Confidence Intervals (CI) or error bounds around current forecasts indicate a wide range of variance.

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We do not support changes to current regulations in respect to changes of fishing periods to 8 hour increments from 12. The current allowable time per period allows a full tide cycle allowing an opportunity to theoretically allow two full tides, one full flood and one full ebb, to harvest surplus salmon stocks. This allows an opportunity for the approximately 70 miles of the ESSN fishery to have reasonable access to a fishery by accommodating the specific geographic conditions and tidal sequencing at their specific setnet location.

We do not agree with an increase in an increase in continuous closure periods. There is already 60 hours of closures in most tiers of the sockeye management. By current restrictions in time and area in the ESSN fishery, further restricted no fishing times would seem unrealistic and unnecessary.

We do agree with the concept of staggered openings by statistical sections to achieve better efficiency.

We do not agree with openings around low water as every fish site location operates with different conditions, Some are predominately flood fishing sites and others are more productive on ebb tides. Typically, sites located near the mouth of the Kenai from the south end of the entrance are more productive with flood tides and less productive on ebbs. That is not a condition for all locations in the general area, and that is why we do not support reduced time or directed allocative starting times, managed by a limited department staff who are not currently familiar with or have the tools to be accurate in the tidal sequencing.

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We incorporate our previous comments from previous pages for page three.

Page Four

It is our concern that the department does not have the ability to determine where salmon concentrations are along the ESSN beaches. They have good indications once the salmon reach the river, but that is after the peak or school has traversed areas of the beach. We highly suggest that the board review 5 AACm21.363. Upper Cook Inlet Salmon Management Plan. As guidance for any proposed modifications to current plans. Specifically, (a) (5).

We do not support the closure of the Kasilof Special Harvest Area, 5 AAC 21.365. Kasilof River Salmon Management Plan. . Within the complex applications of the use of this fishery we direct your attention to part (f) …Before the commissioner opens the KRSHA, it is the board's intent that additional fishing time be allowed in the remainder of the Kasilof Section first, and secondly that the mandatory closures specified in regulation be reduced in duration, if necessary to meet the escapement goals contained within this and other management plans. …

It is our belief that the KRSHA offers opportunity to harvest Kasilof River sockeye excess to escapement and in-river harvest opportunities. Considering that the top end of the BEG has been exceeded by several magnitudes for successive recent years escapements, this allows the entire ESSN a reasonable opportunity to remain an economically viable fishery.

Please consider our recommendations and members of our Ad-Hoc community group, SOKI are always available for questions on our comments.

Thank You,

Paul A. Shadura II

South K-Bch Independent Fishermen's Association (SOKI)

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