

Submitted by Joseph Person

Final comments on Kenai River Late-Run King Salmon Action Plan

Chairman and Members of the Board,

I am a long time participant in the Board of Fish (BoF, board) process, across multiple fisheries, areas, and meetings. I generally consider it to be an excellent model of public process allowing input from stakeholders and citizens giving them access to participation in the regulatory process. The UCI finfish meeting has always been highly controversial, and a significantly different participation experience than any other meeting. This is still the worst that I have ever seen. It has been a total perversion of the intended public process. Proposals are supposed to be submitted long before the meeting, with multiple different opportunities for public comment and testimony, and ample time to review language of proposed regulation. At this meeting, the exact opposite occurred. KPFA and KRSA submitted frameworks as requested for proposed components of the action plan in RC 90 and RC 96. We had a brief committee of the whole where no actual regulatory language was available to be discussed or vetted. During this the Chairman requested a merged version of those two frameworks. Then we were given a very rough combined version produced by board support (RC 146) at the end of the day on Wednesday with instructions to provide commentary and final language by Thursday morning in order for it to be deliberated Thursday afternoon. I personally, was up most of the night writing up commentary on RC 146 (that was submitted as RC 155) and also actual workable regulatory language combining the concepts of RC 90 and 96. I put a great deal of effort, on behalf of KPFA, to work with the authors of RC 90 and make compromises and merge the two frameworks of RC 90 and 96 together into a workable action plan. This was submitted on time, as requested, Thursday morning as RC 156. At this point only RC 146, 148, and 156 had been submitted with regulatory language for a potential action plan. Of these only 156 was close to workable final language. It received no discussion, and deliberation on the action plan was put off another day. It is my understanding that this was done because certain individuals had not completed their action plans. I was explicitly told that the deadline for an action plan to be considered was Thursday morning and did my best to make and accommodate that timeframe. The resulting situation where we received final language versions in RC 169 and 170 at the end of the day on Thursday which were immediately taken up Friday morning with no opportunity for public input or comment. In fact the only action plan discussed in deliberation was RC 170, the final one entered, thus giving the appearance of rewarding the author for abusing the process and submitting their language at the last possible moment, days after committee of the whole on the action plan. This is not how the process is supposed to work.

As to the actual contents of the action plan, I fail to see how it does anything to help the stock recover. It addresses literally zero sources of kenai king mortality that weren't already being addressed in the current management plan. It continues to keep the directed in river fishery

closed, and it continues to make a scapegoat of the UCI setnet directed sockeye fishery and keep it closed. This is exactly the status quo and the current state of affairs in the existing management plan. It does absolutely nothing that we haven't already been doing to protect kings. 12 years of this has not helped the king situation one bit, so let's continue business as usual? It is political and conservation theater.

I greatly appreciate the efforts of board members who tried to work with the stakeholders on all sides in good faith to produce an action plan that gave a chance of prosecuting an extremely limited experimental fishery with minimal expected impacts to attempt to help keep a 100 plus year traditional industry alive through this time of low abundance. I am very disappointed in repeated false statements and obfuscations made on the record multiple times, and the general distortion and perversion of public process. I will continue to participate in the Board of Fisheries process, particularly in other areas and fisheries; but we continue to see that UCI is held to a completely different standard and model of action than the rest of the state by both the department and the board.

Joseph Person