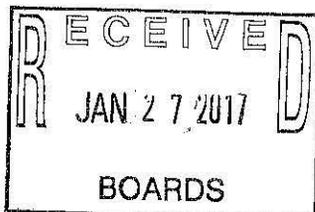


PETERSBURG
ALASKA



January 24, 2017

ADF&G Boards Support
John Jensen, Board of Fisheries Chair
Ted Spraker, Board of Game Chair
PO Box 115526
Juneau, AK 99811-5526

Dear Chair Jensen and Chair Spraker,

The Petersburg Borough Assembly would like to invite your Boards to consider conducting future board meetings in our historic little fishing community when the location will suit your meeting agenda. Holding a board meeting in Petersburg will provide your board members many distinctive opportunities, such as touring the new hatchery at Crystal Lake, walking the harbor docks and visiting with hunters and fishermen, exploring our quaint downtown shops, and enjoying the stunning scenery, just to name a few. With enough advance notice, we will be happy to assist with scheduling, meeting locations, lodging options, meal options, etc.

Petersburg supports and appreciates both Boards' efforts to equitably regulate and preserve Alaska's fisheries and wildlife resources. We look forward to the opportunity to welcome you all to town.

Sincerely,

Debra K. Thompson
Borough Clerk



Submitted By
Preston Williams
Submitted On
2/9/2017 3:40:02 PM
Affiliation
Home Owner on River

Phone
(907) 283-0595

Email
gjt@acsalaska.net

Address
PO Box 3233
2565 Watergate Way
Kenai, Alaska 99611

(I DO NOT EXCEPT THIS Proposal) 201-5AAC 77.540 Upper Cook Inlet Personal use Salmon Fishery Management Plan. This proposal by Alaska Department of Fish and Game should have covered the repair of damage at the Warren Ames Bridge South and North side and should go down the River to the (DNR_DROP) Kenai River Special Management area Marker at Mile Four. This would allow the private Home Owners down River from the Marker to Dep Net. These Private Home Owners have State approved Lifts and Stairways to get to the River without damage to the Banks. Plus they have been Dep Netting ever since the state opened the Dep Net Area. If it is the intent of Alaska Department of Fish and Game to close all the above Waters, then the Private Home Owners with proper State approved Lifts and Stairways should be able to Dep Net from their property. For their land goes out into the River to the high mean water line. The boats in the Dip Net Fishery are out in front of my property are damaging my bank. I have lost about five feet of bank from the waves the boats make when the tide is around 20 to 21 feet and above. I put Proposal 5AAC- 77.540(a)(6)(c)(1)(c) back in 2012 to try and save my vegetation and bank from negatively impacting the riparian habitat however, the board did not accept my Proposal.



Submitted By
Ralph Renzi
Submitted On
2/7/2017 1:27:08 PM
Affiliation

Phone
(907) 354-2886
Email
ralph@morningshire.com
Address
2640 N Hematite Dr.
Wasilla, Alaska 99654

Alaska Board of Fisheries

To Whom it may concern,

Sportfishing is a vital part of the Mat-Su economy. For the last three years more returning salmon (coho 2014 & 2015, sockeye 2015, and kings 2015 & 2016) has meant more people fishing and making purchases at local stores. It has meant more customers for the struggling fishing guide industry, more business for riverside campgrounds, lodging, RV facilities and the tourism industry, gas stations, grocery stores, fish processors and UPS-type shippers.

For Alaskans, especially disabled veterans like myself, on the Little Susitna River, Deshka River, and Fish Creek, it has meant a return to a time when it wasn't so hard to catch a fish.

The higher returns in coho and sockeye started happening after the Conservation Corridor was approved in 2014. Before that increase, the number of angler days had been at its lowest level since the 1970s.

I wholeheartedly support keeping the Conservation Corridor open and oppose any proposals that seek to weaken the corridor.

Sincerely,

Ralph Renzi
TSgt, USAF (retired)



REPRESENTATIVE LES GARA

February 8, 2017

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Kenai River-Bound Sockeye Salmon Dipnetting Season Extension Proposals 202 and 203: Season Should Be Extended To Extent of Commercial Fishing Extensions When Consistent With Escapement Goals, And When Not Harmful To Kenai Silver Salmon Runs

Dear Board of Fish Members:

For the past three years, the sockeye salmon run on the Kenai River has been late. Last year I unsuccessfully requested the Department to equitably extend the sockeye personal use fishery on par with the extension granted to commercial fishermen. The denial of that request has impacted the majority of Alaskans who do not have commercial fishing permits or boats, and calls for an equitable, responsible change in policy. Given the Department's preference to extend the season, when escapement is adequate to protect the fishery, for commercial fishermen over individual Alaskans, the Board of Fish needs to adopt a rule that fairly protects all users, including commercial and personal use fishermen who rely on this fishery, while protecting our salmon runs. An extension, of course, should not continue if it endangers Kenai River silver salmon escapement.

As you know, in most prior years the biggest pulse of fish started entering the Kenai River in mid-July, with daily pulses of sockeye in numbers over 100,000, and sometimes 200,000, entering the Kenai on days between July 15th and 17th. The run since 2014 arrived much later. Since 2014, substantial numbers of sockeye salmon have entered the river after the July 31st closure for personal use dipnet fishermen, and escapement, though late, has been vibrant and healthy. At the same time, recognizing no danger to adequate sockeye and silver salmon escapement (the commercial fishery is shut down under current ADF&G policy when silver salmon escapement is endangered), commercial fishing for Kenai River-bound sockeye salmon has been extended past July 31st, to August 6th, 12th and 9th in 2014, 2015 and 2016 respectfully.

There is no biological justification for denying dipnet access to individual Alaskans who seek sockeye salmon, while allowing the commercial fleet sole access to these fish. The commercial fishery is important to Alaskan families, as is the personal use fishery, and leaving the latter open does not materially impact commercial fishermen. Rather, this policy change would reflect the reality of later fish runs, entering the river after the July 31st closure.



I would leave to your expertise how to possibly amend proposals 202 and 203 in order to fairly extend the season in years when significant escapement is projected to go through the first week of August, and recognize that the Department should be able to close the dipnet fishery when it is extended, just as it does now with commercial fishermen, to protect silver salmon runs. Obviously this should occur only in years the Department has projected that its escapement goals will be met to protect the sockeye fishery and sockeye runs into the future.

The City of Kenai should also be given adequate notice of an extension so that it may keep staff hired to run the facilities and operations it engages in, or contracts for, to help run this fishery.

I hope you will issue a policy to allow the extension of the personal use dipnet fishery on the Kenai River in years, and on dates, where we are projected to meet our sockeye escapement goals, can protect the river's returning silver salmon, and in a way that is commensurate with the commercial fishery extension which occurs only when Kenai River sockeye and silvers are protected.

Thank you for your consideration. I have decided against filing legislation on this issue, recognizing that the Board of Fish is the best forum for discussion and debate on these issues.

Rep. Les Gara

A handwritten signature in black ink, appearing to read "Les Gara", with a long horizontal flourish extending to the right.

cc: Alaska Outdoor Council



To Alaska Board of Fish,

This is a letter of opposition to Proposal 201 as it is written, with an alternate solution.

We the undersigned, understand the issues related with Proposal 201. With the Traffic hazards and wetland foot traffic associated with Dip netting, downstream of the Warren Ames Bridge.

However the current Proposal limits all of the Property owners that are downstream of the Warren Ames Bridge. Properties that are located here are outside the Kenai River Special management Area, and have very little impact on the Ecosystem. In fact many locations have stairs and boardwalks to access the river.

We believe that a good compromise would be to only close dip netting from the beach;

From the Warren Ames Bridge downstream, to the section line that marks the end of the Kenai River Special Management Area.

Thank You, for your consideration on this matter,

<i>Richard J Bagley</i>	RICHARD J BAGLEY
<i>Gretchen Bagley</i>	Gretchen Bagley
<i>Shannon L. Dodge</i>	Shannon L. Dodge
<i>Raymond E. Dodge</i>	Raymond E. Dodge
<i>Raymond E. Dodge</i>	Raymond E. Dodge
<i>M. G. C. Mannausau</i>	M. G. C. MANNAUSAU
<i>Dery Lee Mannausau</i>	Dery Lee Mannausau
<i>Jack Dean Castimore</i>	Jack Dean Castimore
<i>Aris Lanfear</i>	Aris Lanfear
<i>Scott P. Fock</i>	Scott P. Fock



Submitted By
Richard Person
Submitted On
2/9/2017 11:20:38 PM
Affiliation

Proposal 100 **SUPPORT:** The record shows the early run kings are past the Kasilof section by June 20th and that the Kasilof River historically overescapes. Changing the regulatory language concerning early openings when 50,000 reds are estimated in the Kasilof from "**may** open - to **shall** open" would take the political wrangling out of the discussion and utilize those fish.

Proposals 110,111,112 **SUPPORT: The BOF needs to clarify to enforcement that it's historic intent is that one set net can be fished for one permit in the KRSHA**

Proposal 114 SUPPORT: Set net fishermen close to the KRSHA have been setting up permanent net locations on the north and south front lines of the harvest area. These are the most profitable locations. The KRSHA is open to all fishermen equally. This proposal would level the playing field **by requiring all anchoring devices, buoys lines and nets to be removed during every closure of the KRSHA.**

Proposals 176,177 SUPPORT: Currently in the Chinnok plan when bait is prohibited in the river the whole ESSN fishery is limited to 36 hours a week. These proposals would allow managers more flexibility to fish a section when fish are abundant and not preclude fishing in another section when fish are present there.

Proposal 101 SUPPORT: Adopting this proposal would allow kasilof section setnetters to selectively harvest more kasilof reds within the bounds of their personal, historic site locations. Fishing within 600 feet of mean high water in their traditional areas is safer, more orderly and produces better quality product. Processors are becoming more reluctant to purchase fish harvested in the KRSHA. Not counting the 600 foot openings toward any hourly restrictions in place adds greater flexibility for managers.

Proposal 135 SUPPORT: Dividing the ESSN fishery into three sections divided by natural occurring boundaries ie, the kasilof and kenai rivers makes sense. The current arbitrary line dividing the Kasilof and Kenai sections, (Blanchard) though a shrewd and profitable achievement for some, can be improved. Any early harvesting of reds in June lost by starting South K beach later on the first of July should be easily compensated by opening the new kasilof section on June 20th. A possible additional benefit is if there are any early run kings lingering around they would most likely be in the south k beach area allowing them to reach the river. This would also give relief to north k beach.

Proposal 175 SUPPORT: This proposal is intended to correct an oversight by the BOF and the staff when the regulation was adopted. The original regulation was intended to encourage the use of 29 mesh deep nets with the intent of lowering king harvest. Voluntarily with good intent, we cut our nets down to 29 mesh deep. The heart of the regulation was that in certain restricted opening in the Chinook plan, a permit holder could fish 2- 45 mesh deep nets, (a partial compliment of gear) or 3- 29 mesh deep nets, (a full compliment of gear.) The problem is, a permit holder may choose to divide his full compliment of gear into 4- 25 fathom nets instead of the usual 3-35 fathom nets which some do. We were assured by BOF members and department staff that in the final wording of the regulation the 4 nets per permit issue would be clarified, unfortunately, for whatever reason, it was not. As it turned out, this restriction was executed in 2014 and it happened to be our best day of the season and due to clerical oversight we were required to not fish 25% of our gear. That hurt. Please correct this problem by passing proposal 175.



Submitted By
Robert F. Bechtold
Submitted On
1/26/2017 2:13:26 PM
Affiliation

Alaska Board of Fisheries,

Please do consider this request from a lowly recreational fisherman who enjoys fishing on the Kenai Peninsula and Susitna Drainages and dipnetting on the Kenai River annually to provide a sufficient quantity of salmon to augment our family meals.

1. Please do not continue to manage the Kenai River for only one species - sockeye salmon. There are/were other species, such as king salmon and silver salmon, in the Kenai River, which tend to suffer in size and numbers due the great harvest efforts and the reported and unreported by-catch of other species (especially King Salmon) by the commercial fishing fleet. In addition, please be up front with the dipnetters and fisherman. Please consider having closures every Friday 0000 to Saturday 0700, to allow sufficient numbers of salmon to enter the Kenai and Kasilof Rivers, so the efforts by many Alaska families to pack and drive to dipnet can be productive.

2. Please do not open the Ninilchik River for fishing without bait when so few king salmon were returning to the river in mid-June, as was done in 2016. In 2015, opening the king salmon fishing with bait on July 1st was a boon and enjoyed immensely by my family and others on the Ninilchik River. And please do not count the 16-inch jack king salmon to indicate a large return of king salmon to the river.

3. Please do make greater efforts to restore the king salmon runs in the road-accessible Susitna Drainage. The Willow, Sheep, Montana, and other river king salmon runs were very prolific and were quite accessible and productive for the non-boat owner and non-commercial fisherman. My family would greatly appreciate your efforts to restore these king salmon runs.



Submitted By
Ron Maddox
Submitted On
11/15/2016 4:55:25 PM
Affiliation
none

Now facing \$30,000 bank restoration cost, it's very apparent that the increased power boat traffic on the mid-upper Kenai river is increasing at a very fast pace resulting in increased damage to the bank system. I would think it would be to everyone's benefit to slow the traffic and property damage by declaring these waters above the Soldotna bridge a designated drift boat fishery like the Kasloff river. I would suggest this designation extend to Skilak lake outlet. I am confident the biologist would be able to attest to the advantages of added protection for the fish while allowing continued fishing opportunities in a more responsible fashion. My neighbors of many years are complaining as they have witnessed the dramatic increase of motorized traffic and its direct impact on our river banks. Let's not create another lower river problem.



TO: Alaska Board of Fisheries
Upper Cook Inlet Meeting, February 23 – March 8, 2017
Anchorage, AK

FROM: South Central Alaska Dipnetters Association (SCADA)
February 9, 2017

SCADA Comments on Personal Use proposals for UCI meeting

Proposal 195: SCADA opposes this proposal. While we appreciate the efforts of the city of Kenai to keep the beaches clean, we feel that the Kenai River personal use fishery is extremely important to Alaskan residents. When ADF&G projects that the sockeye run is above 2.3 million, we feel it important that the PU fishery be liberalized just like the other fisheries, sport and commercial. In the past we have observed city crews cleaning the beaches effectively when the EO opened up to 24 hours. Not everyone uses the beaches to dipnet – some folks dip from a boat, others dip in areas outside of the Kenai beaches.

Proposal 196: SCADA opposes this proposal. We feel this is an ill-tempered proposal without justification. Just about anyone who dipnets from a boat ties off their nets to some part of the boat. Obviously, this is just trying to subvert a functional dipnet fishery from a boat.

Proposal 197: SCADA opposes this proposal. Another ill-tempered proposal not based on any biological consideration. Very few people anchor their boats while engaging in the active harvest of fish with a dipnet. In fact, those who do often choke off a pass through point where others are moving through the fishery, so it is typically frowned upon as it can cause a navigation hazard.

Proposal 198: SCADA opposes this proposal. Dipnetters use a variety of mesh sizes accordingly to personal preference, with a focus on what works best to harvest salmon for consumption. This proposal seeks to make the dipnet fishery less efficient, meaning less food in the freezers of Alaskan residents.

Proposal 199: SCADA opposes this proposal. Most people dipnet from the shore at the Kasilof personal use fishery. A few use boats to dipnet. A 10 hp limitation is good for a drift boat exiting downstream from a drift only fishery, but hardly appropriate for powering a boat at the mouth of the Kasilof. If the intent is to close this PU fishery to boats, then be forthright and just submit that proposal. Because that will be the practical effect of this proposal. Under-powered boats can cause navigation hazards to themselves and other boaters, and also may encourage use of very small watercraft which may not be appropriate from which to fish. Too small of craft can be a danger to participants – an underpowered vessel in a tidal area with dipnets is a sure recipe for an accident.



Proposal 200: SCADA is opposed to this proposal. This proposal seems to be attempting to create a regulation where there is not an issue. The only place to retain king salmon in UCI PU fisheries is the Kenai River. In these times of king conservation there is not a clamor from our members to retain more kings than allowed – and we fully support non-retention of kings as a necessary tool if required through paired restrictions.

Proposal 201: SCADA is opposed to this proposal. This proposal seeks to close bank dipnetting from the mouth of the Kenai River up to the Warren Ames Bridge, because of suggested habitat impacts. First, everyone seems to complain that cramming everyone on the Kenai Beach is a problem. But then this proposal seeks to double down on that very approach. Home owners along the South Bank of the Kenai River have long dipnetted from their properties, and some store their boats in this zone also. Quite a few people also like to dipnet from the Warren Ames Bridge area – yes there has been some habitat impacts around the parking area, but these impacts can be mitigated with a bank restoration project, which State Parks is considering. And yes there are walking trails in the areas each summer, but these impacts are temporary in nature and grasses sprout up each spring. Just like the hunting trails that spider through the Kenai Flats each fall from hunting activity. Did ADF&G also put in a proposal to the Board of Game to close the Kenai Flats to hunting because seasonal hunting trails develop each fall? And finally, does anyone think that there are no impacts from the huge icebergs that move back and forth across the riparian habitat each tidal cycle, every day through the winter? A better approach would be for ADF&G work in a constructive partnership with Alaska State Parks to complete bank restoration at the Warren Ames Bridge in a timely manner. This PU fishery feeds a lot of families – probably the largest resident-only fishery in the state. Keep this area open – quit trying to unnecessarily restrict public access for Alaskans to a public resource import as food!

Proposal 202: SCADA is opposed to this proposal. The Kenai Personal Use fishery has set dates to allow Alaskan residents to fish during the peak of the sockeye salmon run. Sockeye are the target fish, and by July 31 the run is typically winding down and other inriver fisheries are getting started, such as the coho fishery. Additionally, kings still entering the river in August tend to be the larger sized breeders, getting ready for spawning that peaks around August 20. Finally, we find on even years, pinks become much more abundant at the end of July. And as August approaches, sockeyes start to become watermarked. So we support the fixed end date of July 31. It provides an orderly transition between fisheries, and provides access in the PU fishery when sockeye is abundant.

Proposal 203: SCADA is opposed to this proposal. We do not support extending the Kenai River PU fishery into August. See reasons in proposal 202.

Proposal 204: SCADA supports this proposal. We support the idea of expanding the area upstream from the Warren Ames Bridge to Cunningham Park to dipnetting from a boat. This area has boat and motor restrictions, as it is in the Kenai River Special Management Area. Boats



that don't meet those restrictions (50 HP, 21-foot length) cannot dip net in the KRSMA. Expanding the area in KRSMA to dipnetting from a boat most likely would reduce the congestion in the lower river from the City Dock to RM4 where KRSMA starts. We would also suggest the idea of restricting very small watercraft also to this area of KRSMA, such as boats 25HP and under. The mix of very large and very small boats creates navigation and safety hazards, and an area separation might be a good way to reduce such hazards.

Proposal 205: SCADA submitted this proposal. When the department liberalizes the Kenai River sockeye sport fishery from 3 to 6 fish, we think that it would be a good idea to liberalize the area upstream to Skilak Lake to bank dipnetting from approved elevated light penetrating walkways on PRIVATE property. This approach can reduce congestion in the current area two-fold – property owners who may take a boat downstream could now dipnet from their own property, if they had made an investment in an ELP. Second, it would allow those property owners without a boat to fish responsibly from their own land, and reduce congestion on the Kenai beaches. Requiring dipnetting only from private property on an ELP would be easy to enforce – if you are not on an ELP, you can't be fishing, and it would not overlap with sport anglers who depend upon public access along the river.

Proposal 206: SCADA opposes this proposal. We would prefer that the area upstream of the Warren Ames Bridge be opened to dipnetting to Cunningham Park from a boat.

Proposal 207: SCADA supports this proposal. A proposal from the department on the PU fishery we support!

Proposal 208: SCADA opposes this proposal. There are size restrictions on Dolly Varden below Skilak Lake, so we don't support targeting Dolly Varden in the PU fishery, especially if our proposal is approved to open the area up to Skilak Lake to bank dipnetting from private property on ELPs when the department liberalizes the sport fishery for sockeye.



Submitted By
Susan Payne
Submitted On
2/9/2017 9:08:26 PM
Affiliation

February 9, 2017

Dear Board of Fisheries,

Word has come to Kodiak that you are being lobbied to take up the Kodiak Salmon Management Plans either at the Cook Inlet meeting in February or the Statewide meeting in March concerning the bycatch of Cook Inlet reds by the Kodiak Fleet. All this based on the Kodiak ADFG Genetics Report. I would like to bring a couple of points to the table to caution you on the conclusions of the report.

First, you will notice that the methods in the genetics report do not specify whether the Kodiak samples came from seiner or setnet fish. By the relative magnitude of the Cook Inlet caught reds as reflected by the bubbles at Kodiak's south end and Kupreanof Bay, it is clear that these were seiner caught samples which I have confirmed with Matt Foster of Kodiak ADFG. Any management decisions should be based on information gained from gear specific sampling.

During the Kodiak meeting, I learned that genetic studies have also been done in Area M and in Cook Inlet. However, those studies did not specify stocks outside of the area of concern noting these as "other". Before we can make solid conclusions about the genetics of catch, we will need a comprehensive and long term genetics study with standardized methodology that encompasses all these areas at once. Otherwise, based on this limited study, Kodiak may be unfairly punished.

We have fished our setnet site in Kodiak since 2002. The 2014-2016 seasons, the years of the Kodiak genetics study, were non-typical due probably to the unusually warm winters. Fish travelled differently, both in their migratory path and in timing. Fish also came in compressed fluxes and fish sizes were significantly different. In 2015, reds and pinks were smaller than we had ever seen. We watched in dismay as schools of fish passed through our mesh. In 2016, the pinks were few but exceptionally large, with one pink weighing in at 14 pounds. With this cold 2016/17 winter we are hoping for a return to normal patterns of fish distribution, timing, and catch.

In conclusion, the Kodiak Management Plans already take into account the interception of fish going to Cook Inlet...this battle having already been fought. With changing climate, management cannot be an exact science and as setnetters we are trying to be patient with that. Management changes must protect traditional gear types. As stakeholders, we need specific proposals to assess and time to do that. Please postpone this debate.

Respectfully,

Susan Payne

Kodiak, AK



Chairman and Members of the Alaska Board of Fish,

I have fished North Kalifonsky Beach (stat area 244-32) for 28 years. I am in full support of proposal 136, which would give back a small portion of the fishing time that has been taken from this area since the Blanchard Line went into regulation.

This proposal is asking ADF&G to MAY open 244-32, after July 8 with limited gear and area to harvest surplus Kasilof stocks. NKB since before statehood was a harvester of these stocks.

The Kasilof River continually goes over its escapement goal, and the majority of the escapement is made up of smaller sockeye. Please let NKB have a small opportunity to harvest these surplus stocks.

The biggest opponent of this proposal will be setnetters on South Kalifonsky Beach.

No set net fish site before the advent of the Blanchard Line on NKB would have ever traded for a site on SKB. Now SKB gets twice the fishing time, catches twice the kings and reds.

I would hope the BOF would look at this gross inequity and let NKB have a limited opportunity to participate on the TRADITIIONAL Kasilof fishery.

Thank you,

Todd Moore

Soldotna Ak
Box 4162

2/1/2017





Submitted By
Todd O. Moore
Submitted On
2/6/2017 4:10:46 PM
Affiliation
ESSN

Members of the Alaska Board of Fish

I have setnetted North Kalifonsky Beach (NKB) for 28 years. NKB has been severaly impacted with the Late Run King Salmon Managment Plan, when on August 1 the plan goes from an estimated in-river goal to a estimated spawning escapment. This puts all the in river sport harvest directly on the back of ESSN fishermen. I would urge the BOF to take a hard look at this issue and look at passing proposal 165.

I support proposals 112, letting dual se net permit holders to fish both permits in the Kasilof terminal harvest area.

I also support proposal 124, which would loosed some restictions on fishing a very under utilized pink salmon run to the Kenai River.

Thank you,

Todd O. Moore

Submitted By
Todd O. Moore
Submitted On
2/6/2017 3:56:53 PM
Affiliation
ESSN

Members of Alaska Board of Fish,

I have setnetted North Kalifonsky Beach (NKB) for 28 years. I am Set Net permit holder and hold a State of Alaska shore fishery lease on NKB. I have fished 45 mesh deep gear and 29 mesh deep nets. I have found that shallow nets catch less king salmon and still harvest good numbers of red salmon.

If the BOF passed proposal 140, which would let fishermen voluntatily fish 29 mesh deep gear and add on 10 fathoms in lenght, I would changed all my gear. With this change in gear, it would still work in my ADI shore fishery lease. I am positive that my king salmon harvest would decrease and my sockeye harvest would be equavalent to fishing 35 fathom and 45 mesh deep gear.

This is defintly a forward thinking proposal that would save King salmon and still let me harvest red salmon when we are allowed to fish.

Please consider passing proposal 140.

Todd O. Moore



WRITTEN COMMENT Board of Fisheries - Upper Cook Inlet Finfish - Anchorage, 2017
Trevor Rollman - Northern District Setnetter
907-632-8664 rollmat@yahoo.com 3000 S. Saindon St. Wasilla, AK 99623
I give my consent to share my contact info on copies of my Written Comment

These comments will pertain to Proposals 209-218 regarding the Northern District set-net fishery. First, I'll make some general comments and points regarding our fishery in order to provide you with information which should prove pertinent to many, if not all ten of the proposals. Please take these general comments into consideration for all ten of the proposals even if I decline to comment on a specific proposal. Second, I'll give a position on individual proposals with comments specific to that proposal. I may also make reference my general comments and points in the first section.

Please refer to the attached map.

The Northern District is a set-net only fishery. It has traditionally been that way for nearly 100 years and by law for decades. Salmon runs to the Northern District in general, particularly sockeye, have been declining since the mid 80's. I, personally, have made a correlation between this decline and the expansion of the Central District off-shore set net fishery which ballooned in the 1980s. It is no mystery that this, paired with the drift fleet, intercept many salmon bound for Northern District commercial fishermen, sportsmen, and spawning grounds. As a result of this decline, the participation of set-netters in the Northern District has been reduced roughly 75% since that time. Most of those of us who remain are families passing on this historic tradition and life-style to their children and grandchildren. We greatly value this lifestyle and the income it provides, reduced now as it is compared to earlier years. Many of us are working hard to add value through direct marketing to niche markets.

This great reduction in participation in the fishery, coupled with the fact that we only fish two, 12hr periods per week (essentially never - twice since 1989 - being granted extra time by E.O.) results in an extremely low harvest rate of returns to the Northern District streams.

We are a unique fishery. Our season opens early for minimal harvest of Kings and stays open late to allow a minimal harvest of Silvers. The high economic value of this small proportion of the resource is invaluable to our small family operations and is valuable to the local economy, including allowing local processors an early start.

As a general rule, we would simply like to be able to humbly fish our two periods per week. No more, no less. Our best rationale for this is our minimal harvest rates as shown in GSI Data.

General Points Applicable to More Than One Proposal

1. Minimal Harvest Opportunity

a. Regular Season (June 25 - Closure) Two(2) 12-hour periods per week. That is 24 hrs fishing in a 168 hr week. **Fish pass through the N.D. untouched at least 144 of 168 hrs per week. 6/7 of the season.** Also, during open hours low tide prohibits fishing for hours for many fishermen.

b. King Season (Beginning Memorial Day - Regular Season) One(1) 12-hour period per week. 12 hrs fishing out of 168 hrs in a week. **Kings and early Sockeye pass untouched at least 156 of the 168 hours in a week.** Low tides exacerbate these hours.

2. Minimal Harvest

- a. Avg. Sockeye harvest rate by N.D. set-netters of Susitna drainage stocks, 2006-2013: **1.68%**
- b. Chinook harvest rate of N.D. stocks over roughly same time period: **0.5% - 1.5%**



***NOTE: These first two are my most emphatic and universal points in my defense of Northern District set-netters. I can not stress enough the relevance of this as an argument against anyone who would say that we have "liberal" harvest opportunity (several of these proposals). The Department of Fish and Game has said that Northern District set-netters are "STATISTICALLY INSIGNIFICANT" (emphasis mine) when it comes to our miniscule impact on N.D. salmon stocks. Northern District set-netters are painted and perceived as massive over-consumers, the greediest of the bad guys. The reality is we are a small, traditional user group with a nearly imperceptible affect to escapements, yet giving a nice boost to the local economy.**

3. Paired Restrictions are Dangerous and Inappropriate for the Northern District

Most paired-restriction proposals seek to tie a sport-fishing restriction on a certain stream system of group of streams to closure or severe restriction of an entire fishery - the whole Northern District. This sort of pairity is not fair and does not make sense.

4. Permanent Elimination of a Fishery - Extreme, Restrictive to ADF&G

Permanent closure of a fishery or season based on recent year's return fluctuations is not the right way to handle it. If escapement goals are not being met, ADF&G can use its Emergency Order authority to restrict that fishery or season, closing it for the season if that is necessary. Permanent elimination of the fishery/season would take that management tool away from the Department.

Comments on Specific Proposals

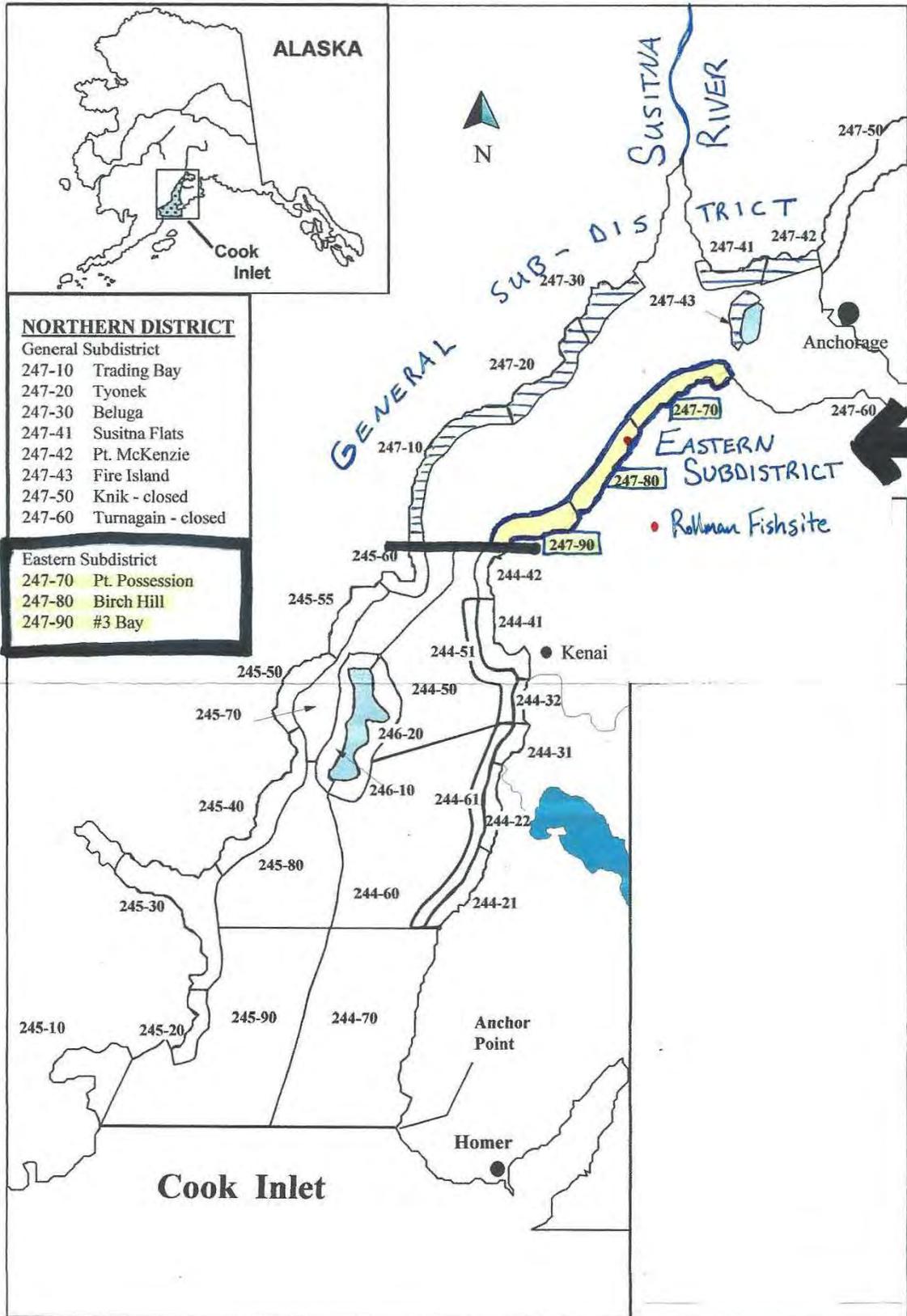
209 - Opposed. (General Points 1b, 2b, 4) This would result in the loss of an early economic resource available nowhere else in Cook Inlet. We catch not only a small number of kings but also some early reds. The price for these sought-after early fish is high and is a benefit to many locally. Please don't permanently eliminate a fishery.

211 - Opposed. (General Points 1b, 2b, 3) This is already a severely limited fishery. One 12 hr period per week. The Department has also shown that they will use E.O. authority to restrict this fishery even more when necessary. E.O.s have been issued in years past to completely close a period and or restrict some or all of our king periods to 6 hrs. A 6 hr opener is sometimes impossible to fish because of the timing of the tides.

212 - Opposed. (General Points 1a, 4) Section (a) of the Northern District Salmon Management Plan does state that one of its purposes is to "minimize" the harvest of Northern District coho. That purpose is then expressly met within the plan in section (d). Coho take is minimized through prohibiting the Department from granting additional fishing periods other than the two regular weekly periods either (1) when coho are projected to be the most abundant species, or (2) after August 15th. See **5 AAC 21.358** (d)(1)&(2). Based on our 24/168 hrs fished per week and the low participation rate which is even lower this late in the season, our harvest IS minimized already. The economic value of these fish go up later in the season; a boost to local economy. See comments on 209. We highly value these fish at the tail ends of our traditional fishery.

213-216 - I don't support these proposals in solidarity for fellow set-netters. It would not be right to eliminate their shore-fishery leases. Also see my general comment on pairity, 3. Also remember that this is one (kings) or two (silvers) 12 hr period(s) per week, not "liberal" harvest as is stated.

218 - In Favor. This proposal seeks to make the letter of the law match the original intent. The intent of stacking permits was to allow two sets of gear to be fished in one person's name. The current wording of this regulation makes that confusing. The proposed re-wording makes it clear.





United Cook Inlet Drift Association

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February 9, 2017

Mr. Glenn Haight, Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Board of Fisheries Comment for Upper Cook Inlet Finfish Meeting

Commercial fishing groups in Upper Cook Inlet were compelled to use the courts to enforce Federal law regarding salmon management due to an improper delegation of authority to the State of Alaska and the National Marine Fisheries Service's (NMFS) abdication of their responsibility. On September 21, 2016, a three judge panel of the Ninth Circuit Court ruled unanimously in favor of the fishing groups.

The Court held that the Magnuson-Stevens Act (MSA) unambiguously requires a Regional Fishery Management Council to create a Fishery Management Plan (FMP) for each fishery under its authority that requires conservation and management. The panel further held that the Magnuson-Stevens Act allowed delegation to a state under the FMP, but did not excuse the obligation to adopt an FMP when a Regional Fishery Management Council opted for state management.

In order for NMFS to delegate management authority of the Cook Inlet Salmon Fishery to the State of Alaska, the state's management measures must be consistent with the MSA, the Ten National Standards, Essential Fish Habitat (EFH) requirements and other applicable federal law. For this transition to be as seamless and as orderly as possible, we encourage the Board of Fisheries to move towards compliance with the MSA at this 2017 UCI meeting.

The salmon resources in the Cook Inlet watershed are facing accumulating threats to their survival and some stocks are in decline from the effects of climate change, warm water, invasive species, urbanization and management schemes based on faulty or incorrect data. We need to utilize the best available science on these and other issues to ensure the sustainability of these resources, and the economies that are built on the harvest of surplus salmon stocks.



UCIDA has six proposals before this Board for consideration during the Upper Cook Inlet finfish meeting. Five of our proposals directly address 3 major problems in the UCI commercial salmon fishery:

- Regional managers are not currently able to manage the fishery to meet sockeye escapement goals because of prescriptive management regulations;
- Various escapement goals for the Kenai River are conflicting, confusing, and/or unsustainable;
- Sockeye, chum, pink and coho salmon species are under-harvested.

These management problems are the result of regulations that do not comply with the 10 National Standards under the Magnuson-Stevens Act.

Our proposals number 89, 90, 94, 117 and 129 address:

- Repealing mandatory time and area restrictions during July, including those based on the Susitna Sockeye stock of yield concern and the Susitna Sockeye Salmon Action Plan;
- Repealing the 1% rule;
- Repealing the Kenai River late-run sockeye Optimum Escapement Goal (OEG);
- Incorporating a provision for harvesting surplus salmon stocks into the considerations required for developing the Upper Cook Inlet Management Plan.

The MSA requires the use of best available science. The most recent scientific data from ADF&G has refuted flawed assumptions or faulty data that were used to justify mandatory time and area restrictions, the 1% rule and the use of the OEG. All of our scientifically based proposals above would move the fishery towards the goal of achieving maximum sustained yield.

Our proposals each have their detailed explanations in the proposal book. We are providing a broader overview of the systemic problems in the balance of this document.

Under-utilization of sockeye salmon

For the 6th consecutive year, the sockeye in-river goal in the Kenai River has been exceeded. In four of the five past years, the sockeye escapement goal in the Kasilof River has been exceeded. This systematic over-escapement has two significant negative effects. First, surplus salmon go unharvested (See Fig. 1), failing to achieve optimum yield and reducing the economic value of the salmon harvest to the industry, and regional and state economies (See Fig 2). Secondly, future salmon production is negatively affected by the over-escapements, decreasing the economic value of the salmon harvest in future years. These consequences are well documented in literature and in the long term data set for Cook Inlet.



Over the past three decades, the Kenai River sockeye escapement has tripled. In 1985, the escapement goal range was 350,000 – 500,000. Currently, the goal range is 1 - 1.2 million. During this time period, the average Kenai sockeye run size has decreased by 30%.

Fig. 1 Sockeye Escapements and Surplus 2011-2016

Year	Kenai River			Kasilof River		
	Inriver Goal* (Thousands of Sockeye)	Sonar Count (Thousands of Sockeye)	Est. Pounds Over Midpoint of Goal	Escapement Goal (Thousands of Sockeye)	Sonar Count (Thousands of Sockeye)	Est. Pounds Over Midpoint of Goal
2011	1,100-1,350	1,599	2,431,000	160-340	245	-
2012	1,100-1,350	1,582	2,428,000	160-340	375	705,000
2013	1,000-1,200	1,360	1,638,000	160-340	490	1,520,000
2014	1,000-1,200	1,525	2,635,000	160-340	440	1,093,000
2015	1,000-1,200	1,703	3,317,000	160-340	470	1,119,000
2016	1,000-1,200	1,384	1,647,000	160-340	240	-

This table includes only the Kenai and Kasilof sockeye runs because they are the only runs that are enumerated in a comprehensive way. The sockeye salmon in Upper Cook Inlet (UCI) that are returning to other systems may also be experiencing similar effects.

*5 AAC 39.222 (6)(f)(19) “inriver run goal” means a specific management objective for salmon stocks that are subject to harvest upstream of the point where escapement is estimated: the inriver run goal will be set in regulation by the board and is comprised of the SEG, BEG, or OEG, plus specific allocations to inriver fisheries.

When a goal is expressed as a range, the midpoint is the target. Over the years, the actual escapement should range both below and above the midpoint. If the goal range is consistently exceeded then the management objectives are not being met.

The chronic over-escapements shown in Figure 1 add up to hundreds of thousands of sockeye salmon and millions of pounds. This is salmon that is surplus to spawning needs, and it is being wasted. Commercial fishers were prevented from catching them, personal users and sport fishers did not catch them. The local and state economies were deprived of the benefit of the \$66 million value of these fish.



Fig. 2 Ex-vessel Value of Surplus/Unharvested Kenai & Kasilof Sockeye 2011-2016

Year	Est. Lbs. Over Midpoint of Goal	Avg. Commercial Price/lb. for Sockeye	Est. Ex-Vessel Value of Surplus - Unharvested Sockeye	Surplus/Unharvested as Percentage of Actual Harvest
2011	2,431,000	\$1.50	\$3,646,500	10.10%
2012	3,133,000	\$1.50	\$4,699,500	21.00%
2013	3,158,000	\$2.25	\$7,105,500	26.90%
2014	3,728,000	\$2.25	\$8,388,000	36.50%
2015	4,436,000	\$1.60	\$7,097,600	44.30%
2016	1,647,000	\$1.50	\$2,470,500	11.9%
Total	18,533,000 lbs		\$32,964,000	
Estimated First Wholesale Value Loss				- \$66,000,000

How and why is this \$66,000,000 economic loss happening?

The Board of Fish (BOF) has adopted salmon management plans for Upper Cook Inlet (UCI) that have become overly complex and cumbersome creating conditions where managers find it impossible to respond to real-time salmon run events. Adaptive management practices have been largely abandoned by the BOF in favor of highly prescriptive plans. In 2015, local biologists had to request a legal opinion prior to making management decisions during the salmon season.

The Kenai River is the only river in the state to have five different sockeye salmon goals. These goals are confusing to the public and fishery managers. There are disagreements between the commercial and sportfish divisions within ADF&G over which goals should be used when making in-season management decisions. The goals are often conflicting during the season due to misinterpretations and the uncertainties and often daily variations in the estimates of run timing, run strength and harvest rates. The “Optimum Escapement Goal,” or “OEG” for Kenai River late run sockeye exceeds the SEG. The misnamed OEG is also inappropriate to use for inseason management because the sport harvest must be counted prior to determining if the goal was met or missed, but the sport harvest isn’t known until 18 months after the season ends. The Kenai River OEG is incompatible with the findings of both of the latest ADF&G escapement goal reviews; it is confusing, redundant, conflicting and should be repealed.



Fig. 3 Kenai River Escapement Goals

Biological Escapement Goal (BEG)	600,000 - 900,000
Sustainable Escapement Goal (SEG)	700,000 - 1,200,000
In-River Goal (IRG) (by run size)	< 2.3 mil: 900 - 1,100,000 2.3 - 4.6 mil: 1,000,000 - 1,200,000 > 4.6 mil: 1,100,000 - 1,350,000
Optimum Escapement Goal (OEG)	700,000 - 1,400,000
* The In-River Goal includes an allocation for in-river users that ranges from 200,000 to 650,000 depending on sockeye run size to the Kenai River. These large allocations cannot be harvested in-river without damaging critical salmon habitat.	

Under-utilization of coho, pink and chum salmon

Similar factors are causing a gross underutilization of coho, pink and chum salmon in UCI. To realize the full economic benefit of our salmon resources, ADF&G and the BOF need to carry out their mission to return to maximum sustained yield management (MSY) for all salmon species in Cook Inlet.

In 2002, ADF&G conducted a marine tagging project designed to estimate the total population size, escapement, and exploitation rates for coho, pink and chum salmon returning to Cook Inlet (Willette et al. 2003). This study estimated the harvest rate of coho salmon in the commercial fishery at about 10% of the total run, the harvest rate of pink salmon in the commercial fishery at about 2% and the harvest rate of chum salmon in the commercial fishery at about 6%. (The harvest rate of coho was actually less than 10% because this project ended before the Kenai coho run started.)

Fig. 4 Average and Annual Number of UCI Salmon Commercially Harvested

	Coho	Pink	Chum
1975 - 1984	363,000	730,000	833,000
1985 - 1994	506,000	397,000	441,000
1995 - 2004	222,000	209,000	178,000
2005 - 2014	171,000	247,000	123,000
2014 Harvest	137,376	642,879	116,093
2015 Harvest	216,032	48,004	275,960
2016 Harvest	147,469	382,436	123,711

In Figures 5, 6 and 7 escapement needs and harvests by various user groups are shown for coho, pink and chum stocks. The data set is from 2014. Escapement needs are from ADF&G sources. Escapements are estimated for stocks with no established escapement goals, based on Willette et al. 2003.

Figure 5. Distribution of the 2,750,000 Coho Run in Upper Cook Inlet, 2014

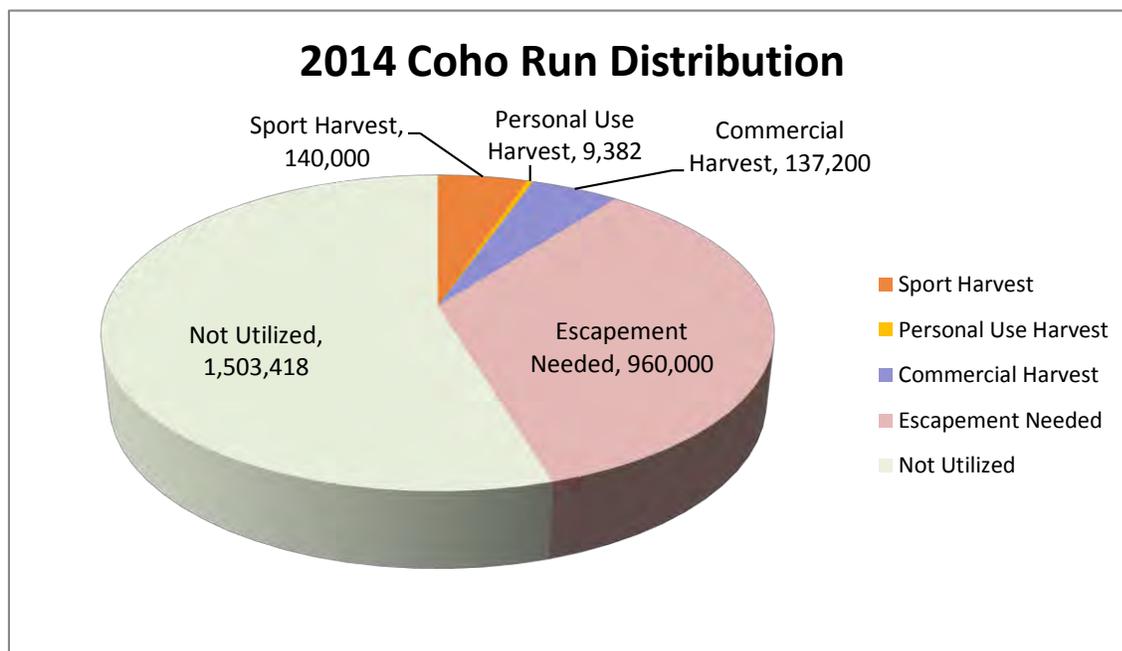


Figure 6. Distribution of the 20,000,000 Pink Run in Upper Cook Inlet, 2014

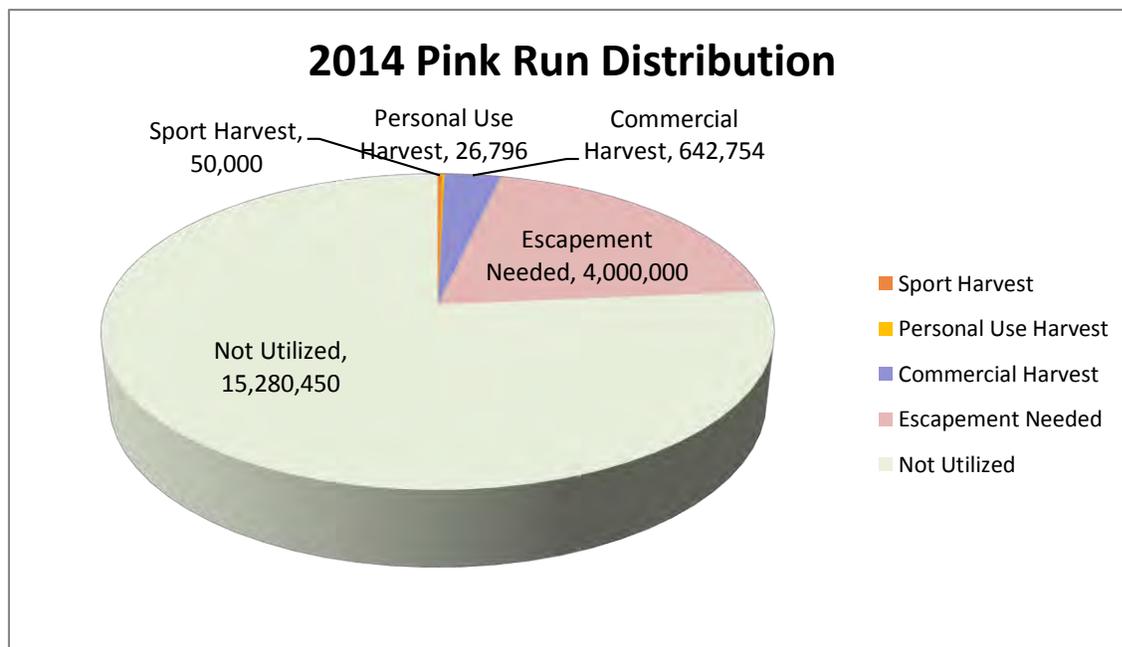
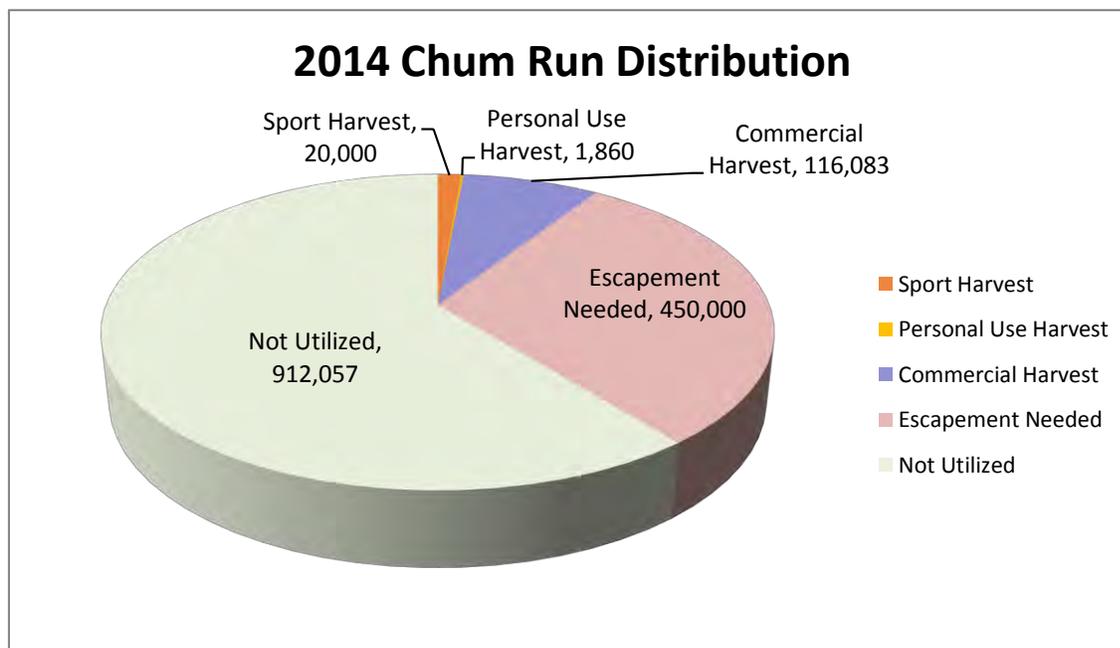


Figure 7. Distribution of the 1,500,000 Chum Run in Upper Cook Inlet, 2014



Summary of under-utilization of salmon – see Figure 8.

- About 30,000,000 salmon returned to UCI streams and rivers in 2014. These salmon returns to UCI are some of the largest wild, native returns in Alaska. After escapement needs (7,000,000), there were approximately 23,000,000 salmon available for harvest. Of the 23 million salmon available for harvest, only around 4.5 million were utilized.
- If harvested in the commercial fishery, the 23 million salmon would be worth over \$150 million dollars at the First Wholesale Value level.
- Non-utilized/unharvested describes those salmon in excess of escapement needs that have gone past the commercial, sport and personal use fisheries.
- These abundant salmon stocks should be available for harvest; however, the effects of current BOF and ADF&G management plans and policies result in over 80% of these stocks going unharvested. Specifically, 87.6% of the Chinook, 18.8% of the sockeyes, 84.0% of the coho, 95.5% of the pinks and 86.9% of the chum salmon stocks swim through UCI untouched.
- The non-utilized stocks represent millions of lost tax revenue dollars to the State Treasury, tens of millions of dollars in lost economic benefit to the regional economies, loss of food products and by-products, and lost jobs. These same non-utilized salmon represent an opportunity for growth and diversification in local, regional and state economies.
- The commercial sector is the only user group that has the capacity or the ability to harvest and monetize these surplus stocks.



Figure 8. Summary of all under-harvested stocks

2014 Upper Cook Inlet Salmon Stock Status & Harvest						
	Chinook	Sockeyes	Coho	Pink	Chum	Total - All Species
Total Run	250,000	5,500,000	2,750,000	20,000,000	1,500,000	30,000,000
Less Escapement Needed	(100,000)	(1,500,000)	(960,000)	(4,000,000)	(450,000)	(7,000,000)
Available Harvest	150,000	4,000,000	1,790,000	16,000,000	1,050,000	23,000,000
Commercial Harvest	4,600	2,343,032	137,200	642,754	116,083	3,243,669
Percentage	3.1%	58.6%	7.7%	4.0%	11.1%	14.1%
Sport Harvest	18,750	397,985	140,000	50,000	20,000	626,735
Percentage	12.5%	9.9%	7.8%	0.3%	1.9%	2.7%
Personal Use	50	506,079	9,382	26,796	1,860	544,167
Harvest Percentage	0.0%	12.7%	0.5%	0.2%	0.2%	2.4%
Total Harvest(s)	23,400	3,247,097	286,582	719,550	137,943	4,414,572
Percentage By Species	15.6%	81.2%	16.0%	4.5%	13.1%	19.2%
Unharvested	126,600	752,903	1,503,418	15,280,450	912,057	18,585,428
Percentage by Species	84.4%	18.8%	84.0%	95.5%	86.9%	80.8%



Submitted By
Victor Hett
Submitted On
1/20/2017 7:26:13 PM
Affiliation
sport fishing

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Sir:

I have been looking at the subsistence proposal on 204 which would extend the dip netting area up the Kenai River to Cunningham park.

As I am sure you are aware, the dipnet fishery creates a disaster on the beach in the present dip netting area caused by those that have no regard for the mess they leave when finished.

. I live three houses up from the Kenai River Bridge and four houses down river from the Cunningham park and fear for the garbage and the damage to my river bank that is very sensitive to the environment. With this proposal being from boats only, We know that when nature calls the bank of the river is where they will go to take care of business or cleaning of their fish. During high tide the river bank has been a continual challenge for me fighting the loss of the bank which will be accerelated problem with the extra foot traffic. I have lived at this residence for 37 years and do not want to think of the destruction this proposal 204 would create.

In addition to this problem that would be created, Cunningham park is not designed for the heavy use that this would bring.

Please consider that the little bennefit this might give to dipnetters, the damage would be a disaster to the environment.



Submitted By
Winton Voetmann
Submitted On
2/7/2017 4:17:33 PM
Affiliation
Alaskan

I believe that whenever there are sufficient numbers of Kenai River reds to allow for commercial fishing, then Alaskan personal use dipnetters should also be allowed to fish.