

Glenn Haight, executive director  
Chair John Jensen, Alaska Board of Fisheries  
Board Support Section, Alaska Board of Fisheries  
Re: Upper Cook Inlet proposals 119 and 120

February 10, 2017

Dear Mr. Haight,

RC 2 authored by Alaska Department of Fish and Game (2A17-01 Regional Information Report) released on February 9<sup>th</sup> to the public by Department comment on public proposals submitted for the Upper Cook Inlet meeting misrepresented proposals to the public.

The authors of the proposals petition for immediate corrections and bifurcation of these proposals due to the Department's comment action which combined both proposals through response to the public.

Proposal 119 was submitted to address two tiers within management of Kenai River late-run sockeye salmon Plan and 120 was written on sole addressment to reduce in-river goals and sport harvest levels within established three tiers over habitat issues per the no net loss proviso within this Plan. Note, clear language and written context within these proposals are stated and submitted as two different proposals. Inappropriately, the Department of Fish and Game chose to combine two different proposals in their response - which undermines the public proposal process. In fact, by confusing the public on separate issues and allocation.

This is a formal complaint under the State of Alaska Administrative Procedures Act. The authors seek immediate corrections and bifurcation of these proposals from ADF&G and sent to all Advisory committee panels and public. Proposal 119 was germane to RC 213 (ADF&G 2011 Board meeting). However, ADF&G chose to completely ignore comment over RC 213 which pertained to both the SEG and sport harvest levels and the in-river goals. Proposal 119 seeks clarification and yet the Department offered nothing and silent on the reallocation of fisheries by the Department.

Instead, the Department chose to insert comment on proposal 119 as "also increase the likelihood of restrictions or closures when passage is near the lower bound of both proposed in-river goals." This is a false statement, as restrictions in current provisions within regulation pertain to less than 2.3 runs only and Sport Fish has never restricted the sport fisheries above the sonar counter on runs above 2.3 million – period. Factually, Sport Fish Division has inserted unsubstantiated allocations to the public and the Board within their response.

The Department is charged with presenting factual and scientific information to the public and Board for consideration. The authors seek immediate relief and objective language by fact. However, in this case ADF&G chose to combine and therefore misrepresent the public proposal process and biased public proposals. By contrast, OEG proposals were treated differently and separate; including ADF&G's proposal 116.

Sincerely,

Jeff Beaudoin  
Mark Ducker  
Suzanne Ducker

CC: Sam Cotton, Commissioner; Boards and Commissions Office  
Scott Kelley, Director of Commercial Fisheries  
Forrest Bowers, Deputy Director, Division of Commercial Fisheries