

Submitted by Joseph Person

This is a response to RC 83 submitted by the department at the request of board member Ruffner and details the reasons for my opposition to the proposed language for the Kenai Late-Run Sockeye Plan and supplying proposed language that I support. While we feel that there is no scientifically defensible position for an increase in the upper end of the inriver goal and it is simply allocative, a slight increase in exchange for some relief in other areas of the plan seems possible. However the language in RC 83 is completely unacceptable.

- Raising the upper end of the inriver goal to 1,300,000 is not feasible on the mid-range runs governed by the middle tier of the sockeye plan.
 - On a run of 3,000,000 fish or less the management implications of expecting the harvest of the ESSN fleet, the drift fleet, the personal use fishery, and the below counter in-river fishery COMBINED to be managed to less than 1,700,000-200,000,000 is highly concerning.
 - RC 76 demonstrate that the absolute ideal point for maximizing is around 1,100,000. However 800,000-1,400,000 all fall within 10% of that projected yield.
 - If the board is comfortable with putting 1,200,000-1,400,000 spawners into the Kenai River on years of high abundance they should be equally comfortable with putting 800,000-950,000 spawners into the river of years of lesser abundance as the expected yield outputs correlate almost exactly.
- Raising the lower end of the inriver goal to 1,300,000 fish in the upper tier does not address the problem stated of the narrow inriver goal range being too difficult for the department to hit. Raising the upper end is reasonable, raising the lower end is not.
- This plan is yet another unjustified punishment to the commercial fleet, as it only takes fish away and offers no reductions in restriction in return.

The following is proposed language for the use of the board in revising the Kenai River Late-Run Sockeye Management Plan. Functionally it does the following and otherwise leaves the plan as currently written.

- Removes OEG and replace with the SEG
- Raises the high end of the Inriver goal in the third tier to 1,500,000 fish
- Removes the "Tuesday Window" in the middle tier

I feel that this does an admirable job of simultaneously fulfilling the department's request to clarify between the OEG and the Inriver Goal for management purposes; and striking a compromise between providing further allocation for the inriver fishery in times of high abundance while provide more flexibility to the department when managing the setnet fishery in the middle tier.

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

(a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance. The department shall also manage the commercial fisheries to minimize the harvest of Northern District Coho, late-run Kenai River king, and Kenai River coho salmon stocks in order to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.

(b) The Kenai River late-run sockeye salmon commercial, sport, and personal use fisheries shall be managed to

(1) meet a Sustainable [OPTIMUM] Escapement Goal SEG [(OEG)] range of 700,000 — 1,200,000 [1,400,000] late-run sockeye salmon;

(2) achieve inriver goals as established by the board and measured at the Kenai River sonar counter located at river mile 19; and

(3) distribute the escapement of sockeye salmon evenly within the SEG [OEG] range, in proportion to the size of the run.

(c) Based on preseason forecasts and inseason evaluations of the total Kenai River late-run sockeye salmon return during the fishing season, the run will be managed as follows:

(1) at run strengths of less than 2,300,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 900,000 - 1,100,000 sockeye salmon past the sonar counter at river mile 19; and

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21 _320, through July 20: unless the department determines that the minimum inriver goal will not be met, at which time the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than 24 hours per week, except as provided in 5 AAC 21.365;

(2) at run strengths of 2,300,000 — 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 1,000,000 - 1,200,000 sockeye salmon past the sonar counter at river mile 19;

(B) subject to the provisions of other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21 _320 through July 20, or until the department makes a determination of run strength, whichever occurs first. if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than 5 1 hours per week, except as provided in 5 AAC21.365;and

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 36-hour period per week beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday [AND FOR ONE CONTINUOUS 24-HOUR PERIOD PER WEEK BEGINNING BETWEEN 7 P.M. MONDAY AND 7 A.M. WEDNESDAY];

(3) at run strengths greater than 4,600,000 sockeye salmon,

(A) the department shall manage for an inriver goal range of 1,100,000 - 1,500,000 [1,350,000] sockeye salmon past the sonar counter at river mile 19;

(B) subject to the provisions or other management plans, the Upper Subdistrict set gillnet fishery will fish regular weekly fishing periods, as specified in 5 AAC 21.320, through July 20, or until the department makes a determination of run strength, whichever occurs first; if the department determines that the minimum inriver goal will not be met, the fishery shall be closed or restricted as necessary; the commissioner may, by emergency order, allow extra fishing periods of no more than 84 hours per week, except as provided in 5 AAC21.365;and

(C) the Upper Subdistrict set gillnet fishery will be closed for one continuous 36-hour period per week, beginning between 7:00 p.m. Thursday and 7:00 a.m. Friday.

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