



RC 154

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**Testimony of Arni Thomson, Alaska Salmon Alliance
to the Alaska Board of Fisheries
Soldotna, Alaska
October 18, 2016**

The Alaska Salmon Alliance, is an Alaska-based corporation with offices in Kenai and Anchorage, certified by the the IRS as a 501(c)6, not-for-profit entity in February of 2012. ASA is part of the growing movement of individuals and organizations that support the culture of salmon in Alaska and advocate for research and education to improve science-based salmon management for the benefit of Alaskan communities and all user groups.

Background on the Alaska Salmon Alliance involvement in Alaska fisheries:

The ASA Board of Directors represent Kenai Peninsula-based seafood processors: Inlet Fish Producers; Icicle Seafoods; Pacific Star Seafoods; Snug Harbor Seafoods and Fishhawk. In addition, ASA represents Cook Inlet drift boat permit operators and numerous setnet fishing families that operate primarily in Cook Inlet salmon fisheries. ASA processors are major buyers in Prince William Sound and they also operate in Bristol Bay and the Kodiak area, buying not only salmon, but halibut, black cod and Pacific cod.

The McDowell Report, The Economic Impact of the Seafood Industry in Southcentral Alaska:

Although Southcentral Alaska is well-known for its world class recreational fishing, it ~~is~~ also hosts a vibrant commercial fishing and seafood industry. I have provided you today with copies of the Executive Summary, June 2015, an ASA contracted in-depth baseline analysis entitled, "The Economic Impact of the Seafood Industry in Southcentral Alaska." The report is based on state and federal databases. The report, and the executive summary are available on our website at www.aksalmonalliance.org.

The McDowell report provides an overall summary of the Southcentral Seafood Industry and then breaks it out into baseline community economic profiles for Anchorage and the MatSu Borough, Kenai and Soldotna, Homer, Seward, Cordova and Valdez.

The industry directly employed 10,840 people in Southcentral Alaska, including 7,660 regional residents, in 2013. Including multiplier effects, the seafood industry created an estimated 8,130 (FTE) jobs and \$411 million in annual labor income. Commercial seafood generated \$1.2 billion in total economic output in Southcentral Alaska in 2013.

This includes \$685 million in first wholesale value of seafood products and \$501 million in value added through secondary impacts.

A total of 5,729 commercial fishermen live in Southcentral Alaska and participate in fisheries throughout the State. This is nearly a third (32 percent) of all Alaska resident commercial fishermen. Its 2,168 active permit holders, each of which are a small business, grossed \$308 million in 2013, accounting for 38 percent of all Alaska resident commercial income. The Anchorage/Mat-Su sector had 2,880 FTE jobs in the seafood industry with labor income of \$148 million and surprisingly, the City of Wasilla residents had commercial fishing revenue of \$20 million.

The Southcentral seafood processing sector employed an estimated 4,590 workers in 2013 and paid out \$61 million in wages. The workforce included 1,410 resident workers who earned \$20.3 million. The region contains 36 processing plants, including the new state-of-the-art Silver Bay Seafoods salmon plant that began operations in Valdez in the spring of 2016.

ASA also wishes to point out the intersection of Southcentral Alaska as a major driver in the Washington State and Puget Sound seafood and maritime industry. This is graphically illustrated in a companion study the McDowell Group also completed in 2015 : "Ties that Bind The Enduring Economic Impact of Alaska on the Puget Sound Region." The report was jointly sponsored by Washington and Alaskan-based companies operating in Alaska. One of the largest employers is seafood at 23,900 jobs, 21 percent of the total Alaska related jobs. Alaska-related economic activity in Puget Sound falls into two categories: export-related and natural resource-related. The report is available on the Seattle Chamber of Commerce website.

• The Economic Impact of the Seafood Industry in Southcentral Alaska

The commercial seafood industry generates substantial economic benefits in Southcentral Alaska. The industry in Southcentral Alaska, including 7,660 regional residents, in 2013. Including multiplier effects, the seafood industry created an estimated 8,130 full-time equivalent (FTE) jobs and . The majority of this economic activity is related to regional commercial fisheries; however, Southcentral also contains many resident fishermen who bring home earnings from other Alaska fisheries and the region benefits indirectly from fisheries in western Alaska.

- ▶ **8,130** full-time equivalent jobs created in Southcentral during 2013
- ▶ **\$411 million** in regional labor income
- ▶ **126 percent** growth in residents' gross fishing earnings since 2004
- ▶ **\$70/year** in savings for Southcentral households per year

Executive Summary

The Alaska Salmon Alliance commissioned McDowell Group to analyze the economic impact of the commercial seafood industry in Southcentral Alaska and the region's communities. The scope of work includes analysis of economic impacts associated with commercial fishing, seafood processing, hatchery operations, government functions related to Alaska's commercial fisheries, and the broad range of businesses and organizations providing goods and services to the state's seafood industry. Key findings are summarized below.

Key Findings

- The seafood industry directly employed 10,840 people in Southcentral Alaska during 2013. This total includes resident commercial fishermen and processing workers, hatchery employees, and commercial fisheries management-related staff who worked in the region.¹
- Two-thirds of the workforce were year-round Southcentral residents (7,660 people).
- In addition to these employment figures, approximately 1,000 fishermen who were not Southcentral residents participated in regional commercial salmon fisheries during 2013. These and other nonresident commercial fishermen are excluded from this report's total employment and income statistics at a local or regional level.
- Direct employment in the Southcentral seafood industry is the equivalent of 4,810 full-time (FTE) jobs. Including secondary (multiplier) impacts, the industry accounted for 8,130 FTE jobs in 2013.
- The Southcentral seafood industry accounted for an estimated \$247 million in direct labor income during 2013. Multiplier impacts generated an additional \$164 million in regional labor income, bringing the total seafood industry-related labor income to \$411 million.
- Commercial seafood generated \$1.2 billion in total economic output in Southcentral Alaska in 2013. This figure includes \$685 million in first wholesale value of seafood products and \$501 million in gross value added to the region through secondary impacts.

Southcentral Seafood Impacts, 2013

Employment

Resident Commercial Fishermen	5,730
Processing Workers	4,590
Hatchery/Mgmt. Workers	520

Total Direct Workers 10,840

Direct FTE Jobs	4,810
Secondary FTE Jobs	3,320

Total FTE Jobs 8,130

Labor Income (\$Millions)

Resident Commercial Fishermen	\$162
Processing Workers	61
Hatchery/Mgmt. Workers	25

Total Direct Labor Income \$247

Secondary Labor Income	\$164
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Total Estimated Labor Income \$411

Note: Totals may not sum due to rounding.

Source: McDowell Group estimates, based on ADF&G, DOLWD, NMFS, industry interviews, and other primary sources.

¹ The term "resident" refers to individuals who reside in the region year-round, or within a specific community if labeled "local resident."

- The seafood industry benefits and is affected by many communities in Southcentral Alaska:
 - The Anchorage/Mat-Su economy includes \$149 million in labor income and 2,880 FTE jobs, as a result of the seafood industry in 2013.
 - Local economies in Cordova, Homer, and the Kenai region each received more than \$50 million in total annual labor income. More than 1,000 FTE jobs in each community/area are linked to the seafood industry.
 - Both major processors are expanding in Valdez, and Seward is adding new capacity to service large vessels. The community of Whittier, in addition to hosting a processing plant, is a key part of the region's transportation network. Over 100 million pounds of seafood products passed through Whittier in 2013 destined for Anchorage port facilities or Lower 48 markets.
- Southcentral was home to 2,168 active commercial permit holders in 2013, each acting as a small business and having the same impact in the economy as other independent locally-owned businesses. The region has 35 primary shore-based seafood processing plants and three non-profit salmon hatchery associations, which enhance pink, keta, coho, and sockeye salmon runs.
- A total of 20 Southcentral communities had collective gross fishing earnings exceeding \$1 million in 2013. Southcentral resident commercial fishermen grossed a total of \$314 million in 2013 (including estimated revenue from tendering fish).
- Salmon is the foundation of the region's seafood industry, accounting for 85 percent of total first wholesale value of seafood produced in Southcentral. Sockeye and pink salmon are the most important species in commercial salmon fisheries.
- Commercial fisheries in Cook Inlet and Prince William Sound accounted for the majority (57 percent) of gross fishing earnings, but Southcentral residents also have a significant presence in commercial fisheries outside the region.
- Commercial fisheries create hundreds of millions of pounds of backhaul for regional cargo carriers. This backhaul lowers the cost of living for all Southcentral residents by offsetting northbound freight rates. It is conservatively estimated that seafood backhaul saves Southcentral households at least \$70 per year.

Direct Seafood Industry Employment in Southcentral Communities, Number of Workers, 2013

Community or Sub-Area	Skippers	Crew	Processing	Hatchery/Gov.	Total Direct
Anchorage/Mat-Su Area	724	1,499	1,010	210	3,440
Cordova	298	321	1,050	140	1,810
Homer	455	631	170	20	1,280
Kenai Region	486	718	910	100	2,210
Seward	41	107	520	1	670
Valdez	28	74	610	30	740
Other Communities	136	211	330	15	690
Total	2,168	3,561	4,590	520	10,840

Notes: Does not include commercial fishermen who participate in regional fisheries but reside outside of the region. With the exception of commercial fishermen, figures are rounded and may not sum.

Source: McDowell Group estimates based ADF&G, NMFS, DOLWD, and industry interviews.

Board of Fisheries: Soldotna Work Session
Record Copy

Proposal EF-F16-037: Shell Lake AS A Conservation Concern

Record Copy submitted by Terry Nininger in support of this proposal

In the interest of rehabilitating the Shell Lake sockeye adult escapement and smolt emigration, Shell Lake should be classified as a stock of *conservation concern*, (Sustainable Salmon Fisheries Policy, (SSFP), 5 AAC 39.222 (f) (6), "conservation concern"). In recent history there has never been a greater need to restore a salmon population than what currently exists at Shell Lake.

Adult escapement into Shell Lake has dropped from 69,800 in 2006 to 215 fish in 2016:

Historical Data-Shell Lake Sockeye Escapement

- 1968-1982: estimated escapement of Susitna River ranged from 41,346 to 338,542; average return of 135,242. Based on euphotic volume, estimated adult sockeye production for Shell Lake is 10.3% of entire Susitna River drainage.
- 2006-2011 Shell Lake sockeye averaged 17,900, 7% of ADFG in-river abundance estimates.
- Shell Lake Returning Adults:
 - 2006: 69,800
 - 2007: 26,863
 - 2008: 2,620
 - 2009: 4,968
 - 2010: 2,223
 - 2011: 937
 - 2013: 133
 - 2014: 6
 - 2015: 3
 - 2016: 215

Out migrating smolt has dropped from 80,600 in 2007 to 12 fish in 2016.

Historical Data-Shell Lake Smolt Migration

- Annual Sockeye Smolt-Shell Lake:
 - 1987: 83,273
 - 2007: 80,600
 - 2008: 3,200
 - 2009: 68,651
 - 2010: 2,733
 - 2011: 17
 - 2012: 23
 - 2013: 5
 - 2014: 21,345 (In 2012 CIAA collected 91,300 eggs/resulting progeny raised at Trail Lakes Hatchery and stocked in Shell Lake in 2014: of 80,000 smolt released only 21,345 were counted leaving Shell Lake).
 - 2015: 59
 - 2016: 12 (and 4 Coho)

The sockeye problem at Shell Lake is complex: (please refer to my letter in the Public Comments, PC 25). The collapse of the Shell Lake sockeye population could be far reaching. Given the recent decision by 9th Circuit Court of Appeals in favor of UCIDA's lawsuit and remanding it back to the district court and requiring federal regulators work with the state on a new management plan, ***this could find Shell Lake sockeye entangled in the Endangered Species Act, listing them as a threatened species.***

The Alaska Board of Fisheries needs to take a bold and unprecedented position to declare the Shell Lake sockeye a stock of conservation concern. In the short term this may compromise the interests of sports and personal use fishermen and commercial fishermen, but in the long run it is the only action that will return this fishery to its original and natural state.

October 18-20 Fisheries Work Meeting Petition/Comments

Objective- Unit 2 East Side Susitna King Salmon, Susitna Sockeye Salmon, Fish Creek Sockeye Salmon & Jim Creek Coho Salmon

Alaska Fisheries Board:

My name is Ben Allen, I live in the Matanuska Valley year around. It is here in the Matanuska Valley, where I spend all of my time and money, even when I am not fishing. I earn most of my income as a fishing guide in the Matanuska Valley. I own and operate Millers Riverboat Service with my wife Amber. Northern district salmon stocks are very important to me; they are why I live here.

I am concerned with the sustainability and future of all Northern district salmon stocks, especially East Side Susitna King Salmon, Susitna Sockeye, Fish Creek Sockeye, & Jim Creek Coho. I am asking the Board to consider 3 things.

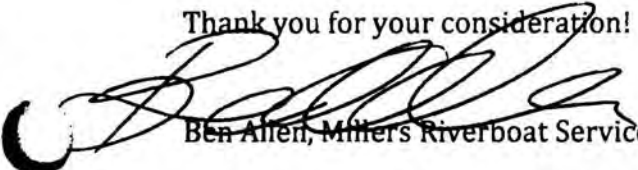
1. Designate East Side Susitna streams, that are not making goals, stocks of yield concern. These fisheries have been highly restricted to sport harvest and have seen little gains since harvest restrictions have been implemented. In addition to being a keystone species in these river ecosystems, King Salmon are very important to the local community. The local tourism economy has seriously suffered as a result of low returns and harvest restrictions.

More attention needs to be directed at monitoring and learning more about these fisheries to ensure long-term sustainability and increased opportunity.

2. Designate Jim Creek Coho a stock of yield concern. This fishery is one of the most popular sport fisheries in our community. Jim Creek dramatically missed the goal in 2016, in addition to missing goals in previous years. This downturn has occurred with increased sport fishing restrictions. Increased monitoring and funds are justified for ensuring a more sustainable fishery.

3. Do not decrease escapement goals on Fish Creek Sockeye and any Susitna Sockeye runs. This action would not be based on science and perpetual sustainability, but from a harvest based agenda. If the trend is low numbers in a relatively small sample size, lowering the target does not solve the problem. A lower in river escapement standard is simply unacceptable for a public resource that is predominately harvested commercially. Matanuska Valley residents would like to see more sockeye return to our region, not a lower standard.

Thank you for your consideration!


Ben Allen, Millers Riverboat Service 907 715 1095 fish@millersriverboat.com

No sockeye salmon return in the Matanuska-Susitna Valley by Cook Inlet Aquaculture.

1. Redshirt Lake – 2009
2. Trapper Lake – 2009
3. Sucker Lake - 2010
4. Neil Lake – 2011
5. Caswell Lake - 2010
6. Shell Lake- 2016 (nearly dead)

Lakes with diminished returns measured by Cook Inlet Aquaculture and ADFG

1. Whiskey Lake
2. Swan Lake
3. Judd Lake
4. Chelatna Lake
5. Larsen Lake : note the last three are the only three lakes measuring sockeye escapement for the entire Susitna drainage
6. Big Lake (the numbers show hatchery fish mixed with wild sockeye, but the numbers for wild sockeye are down)

Lakes with a continued high level of production by Cook Inlet Aquaculture

1. Stephan Lake
2. Byers Lake

Lakes known in the local community to no longer have sockeye salmon returns.

1. Fish Lake
2. Question Lake (both on the spur road to Talkeetna)

Mike Wood

lock of Concern designations assigned by the
Alaska Board of Fisheries. Key rivers and lakes
in the Susitna Drainage identified by ADF&G and
Mat-Su Fish & Wildlife Commission Biologists.
Map Preparation by MSB - IT Dept. GIS Division
Updated June 2015



ALASKA BOARD OF FISHERIES
PUBLIC TESTIMONY
OCT. 18, 2016
J.K. JOHNSON
33820 POLAR ST.; STE. 2
SOLDOTNA, AK 99669

INTRODUCTION:

I have been a professional fishing guide on the Kenai River since 1978. In examining many of the numerous fishing proposals it would appear that the commercial gillnet fishermen want more access to more salmon; most of the sport fishing proposals are concerned with conservation measures for fishery stocks. You have a very difficult job attempting to please all the fishery user groups.

I have seen the "glory years" (the late 1970's into the 1980's); I experienced the systematic destruction of a world famous king and silver salmon fishery on the Kenai and Kasilof Rivers. I would like to see a return to healthy salmon runs for all the salmon species that inhabit the Kenai and Kasilof Rivers. Historically, humans have been very consistent in destroying wild salmon stocks because of their greed.

BODY:

PROPOSALS 85, 86 AND 87 I OPPOSE:

Central District drift gillnet fishermen want more access to "surplus" salmon stocks. But what is the surplus or over-escapement salmon numbers? ADF&G has informed me that they do not know what the maximum carrying capacity is for any salmon specie found in the Kenai or Kasilof Rivers. ADF&G has been managing for minimum escapement for decades, and their use of EO's for sockeyes has prevented adequate escapement for both king and silver salmon.

PROPOSALS 189, 191, AND 192 I SUPPORT:

These common sense measures should help promote a more healthy sport fishery.

PROPOSAL 141 I SUPPORT:

The Kintama Cook Inlet Chinook and Sockeye Salmon Migration Patterns Study of 2012 & 2013 concluded that king salmon travel much deeper into the water column than sockeye salmon. This shallower net proposal should minimize incidental king salmon catches, and yet allow the harvest of sockeye salmon.

CONCLUDING REMARKS:

I believe there is a lack of healthy king and silver salmon stocks in the Kenai and Kasilof Rivers because of poor fisheries management. Continuous gillnet fishing periods due to "surplus" sockeye stocks have prevented adequate escapement numbers for king and silver stocks. I believe ADF&G should be relieved of managing this complicated fishery by bringing in a private fisheries management company. A private company could be made better accountable to Alaskans by terminating them if they do not restore our salmon to healthy levels.

Proposal No. 148 documents how ADF&G miscounted salmon on their sonar from 1986 to 2011. I can concur with the bogus king salmon escapement numbers that were maintained by ADF&G for decades. {Their sonar was counting overlapping sockeye air bladders as a king salmon's air bladder.} As a result of over estimating king salmon escapement, they allowed too many EO's, which severely harmed king and silver salmon escapement into the Kenai and Kasilof Rivers.

Kintama Research Services was brought in from British Columbia in 2012 and 2013 for the Cook Inlet Chinook and Sockeye Salmon Migration Patterns Study (costing over \$650,000 dollars). My interview with the study manager, David Welch, revealed that ADF&G required him to spend excessive funds for the study (about \$200,000 dollars extra). ADF&G didn't want to monitor the salmon that swam through the Eastside set net fishery! Did all that money translate into any data that would improve our salmon fishery? The study confirmed what we already knew: king salmon travel deeper in the water column than sockeye salmon. Will this expensive data lead to meaningful changes in the management of this fishery? We need the courage and resolve to fix our fisheries management failures.

October 18, 2017

Testimony to Alaska Board of Fisheries by Matanuska Valley Fish & Game Advisory Committee

Chairman Jensen and Members of the Alaska Board of Fisheries,

my name is Andrew Couch and in this testimony I am representing the Matanuska Valley Fish and Game Advisory Committee. The Committee Consists of 15 members and 2 alternate members. At this time the make up of the Committee consists of mostly sport hunters and sport fishers, although several members at times may also participate in personal use or subsistence fisheries, and some have also participated in subsistence hunting. Currently there are 2 sport fishing guides on the Committee, but no hunting guides, and no commercial fishing permit holders.

The Committee is providing information on 5 subjects that are up for discussion at this meeting:

- A. King Salmon stock status and recent yield levels from struggling Susitna River king salmon populations in Units 2, 3, 5, and 6. We support Yield stock of concern.
- B. The stock status and recent yield levels of Jim Creek coho salmon. We support consideration for Yield stock of concern.
- C. Suggested Northern Cook Inlet sockeye salmon spawning escapement goal changes that have not been proposed in a timely manner by the Department. We have concerns.
- D. The habitat proposal requesting the Board of Fisheries to ~~lobby the Board of Fisheries~~ to lobby the legislature to adopt habitat provisions contained in the Sustainable Salmon Fisheries Policy into Title 16. We do not support at this time.
- E. Agenda Change Request #6 We feel this does not meet agenda change criteria.

In April the Committee submitted Nonregulatory proposal "G" asking for "Yield" Stock of Concern designation for 6 Susitna River drainage king salmon stocks with established spawning escapement goals, but on October 12, 2016 the Committee decided, with no objection, to include testimony that the Board consider all Unit 2, Unit 3, Unit 5, and Unit 6 Susitna River drainage king salmon stocks for "Yield" stock of concern designation(s). Please refer to RC # which is the Department's yield / harvest and escapement figures for king salmon stocks in Units 2, 3, 5 and 8. Please note: Extremely low harvest in 2012 follow by no listed legal harvest allowed by emergency regulation in 2013, 2014, 2015, and again in 2016 (not shown on chart). The ADF&G Area Fisheries Manager foresees no allowable sport harvest from these river units again in 2017.

At our October 12 Committee meeting the ADF&G Manager mentioned that he knew of no time that the Department had recommended a stock for possible listing as "Yield" concern when that particular stock had not already missed an established spawning escapement goal for a period of 4 or 5 years. The objection by this committee member was that the Department was in reality only considering stocks that qualified for "Management" stock of concern — while the Sustainable Salmon Fisheries Policy clearly states:

5 AAC 39.222. Policy for the management of sustainable salmon fisheries

(1) at regular meetings of the board, the department will, to the extent practicable, provide the board with reports on the status of salmon stocks and salmon fisheries under consideration for regulatory changes, which should include

(ii) identification of any salmon stocks, or populations within stocks, that present a concern related to yield, management, or conservation; and

(42) "yield concern" means a concern arising from a chronic inability, despite the use of specific management measures, to maintain expected yields, or harvestable surpluses, above a stock's escapement needs; a yield concern is less severe than a management concern, which is less severe than a conservation concern;

The Department manager attempted to rationalize not considering either new tributary-based or Unit-wide Susitna drainage king salmon stocks for "Yield" concern designation by saying, 'At this time, the expected yield from these stocks is zero.'

The Committee, respectfully refers the staff and Board to carefully consider the portion of the SSFP definition that states . . . "to maintain expected yields, or harvestable surpluses, above a stock's escapement needs."

For Alaskans and visitors who have lost their legal opportunity to harvest even one Unit 2, Unit 3, Unit 5, or Unit 6 Susitna River king salmon for a period of 4 - 5 years this is a REAL yield concern. We are talking about ZERO in-Unit legal harvest.

While on the subject of salmon stocks that should be considered for "Yield" stock of concern designation, Advisory Committee members noticed that the Department left out mention of Jim Creek coho salmon in its Stock of Concern memo leading up to this meeting.

At the 2013 Board of Fisheries Work Session the Department brought up the subject of Jim Creek coho salmon for Board discussion as a potential "Management" stock of concern since the drainage had failed to reach the McRobert's Creek Index count escapement range minimum in 3 of the previous 5 years. In 2013 Jim Creek clearly did not qualify for "Management" stock of concern status, and therefore may have been an easier topic for the Department to discuss.

Why no mention of Jim Creek in the 2016 work session stock of concern memo? Despite regulatory action taken by the Board in 2014 and in season emergency closures to the sport salmon fishing in 2015 and 2016 the drainage has once again failed to attain the McRoberts Creek coho salmon minimum index count in 3 of the previous 5 years, but in addition, the recent 5-year average coho sport harvest has now dropped by 76% over the previous 10-year period. Not too long ago there were years where the Jim Creek coho salmon sport fishery topped the list for Northern Cook Inlet sport coho salmon harvest. Therefore, the Committee respectfully requests that the Board and Department give reasonable consideration of important Jim Creek coho salmon for potential "Yield" stock of concern designation. For Department generated Jim Creek yield / harvest data please see RC—

Concerning the Department's Memo on salmon escapement goals, the Committee noticed and was concerned with the Department's recommendation to reduce sockeye salmon escapement goals for all 4 sockeye salmon stocks with established goals in Northern Cook Inlet. If commercial fisheries were to be actively managed to keep sockeye salmon escapement numbers below the recommended upper ends of these decreased escapement ranges it would likely have devastating impacts on sport, subsistence, and personal use harvests within Northern Cook Inlet waters and drainages. It was also mentioned at our Committee meeting, that a memo, only made public, after the first public comment deadline, hardly seems adequate public notice for proposed new escapement goals. Department generated escapement goal proposals should be submitted in accordance with the proposal deadline and included in the proposal book for the public, including Fish and Game Advisory Committees, to consider. Below is the standard in 5 AAC 39.223. Policy for statewide salmon escapement goals

(b) The board recognizes the department's responsibility to

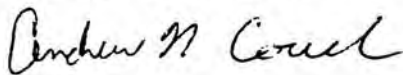
(6) review an existing, or propose a new, BEG, SEG and SET on a schedule that conforms, to the extent practicable, to the board's regular cycle of consideration of area regulatory proposals;

Therefore, if new escapement ranges are to be considered to replace the established Northern Cook Inlet sockeye goals, clear forthright proposals should be issued in time for meaningful public debate, and the Department should follow the standards set in the Sustainable Salmon Fisheries Policy and the Policy for Statewide Escapement Goals. As the proposer, the Department should lead the discussion of likely harvest impacts on all user groups, and likely impacts on all Upper Cook Inlet stocks of concern, or potential stocks of concern if the goals were to be reduced as the Department advocates.

The Committee also heard testimony in favor of non regulatory proposal "N" and a motion was made to support. Several members expressed they had inadequate time to review this proposal, which was not included in the public proposal book. One member wondered how this proposal would impact his small gold mining permit, that is already difficult to obtain on an annual basis. Several Committee members were not certain what the exact wording of the proposal meant, and one member asked if the true intent of the proposal at this point was to request the Board of Fisheries lobby the legislature to include habitat provision from the Sustainable Fisheries Policy into Title 16. This indeed was the request. All except one Committee members were unwilling to support this proposal without knowing what the impacts would be. The Committee was opposed to the Board of Fisheries lobbying the legislature to include habitat provisions from the Sustainable Salmon Fisheries into Title 16 at this time.. Committee members saw value in allowing some future uses or developments to continue that could have impacts on salmon and their habitats. Proposal opposed 1-13-0.

The Advisory Committee also considered Agenda Change #6. The Committee member most interested in this proposal believed Agenda Change #6 simply did not meet the criteria for an agenda change. The Committee agreed unanimously and the proposal was opposed. 0-14-0.

Thank you for Listening,



Andrew N. Couch, secretary

Andy Couch data request tables pdf

Yield by management Units

Eastside Susitna River drainage Chinook salmon harvest by management unit, 2011-2015

	Parks Hwy	Upper Susitna	Talkeetna	Chulitna
Year	Unit 2	Unit 3	Unit 5	Unit 6
2011	1,078	*	1,087	113
2012	34	*	113	0
2013	0	*	0	0
2014	0	*	0	0
2015	0	*	0	0
2011-2015				
Mean	222		240	23

* Statewide harvest information not available likely due to low number of respondents.

Andy Couch data request tables pdf

Yield By Tributary Streams

Appendix A5. Eastside Susitna River drainage Chinook salmon harvest by fishery, 1977-2015.

Year	Willow Creek	Lt. Willow Creek	Kashwitna River	Caswell Creek	Sheep Creek	Goose Creek	Montana Creek	Birch Creek	Sunshine Creek	Talkeetna River *
1977	137	16			259		415			25
1978	47	0			256		408			12
1979	459	0		156	10		312		10	312
1980	289	32		215	45		559		13	172
1981	585	0		249	0		661		57	373
1982	629	0		471	0	0	241	0	52	450
1983	534	0	231	272	0	0	504	0	105	934
1984	774	37	0	586	0	0	1,522	0	125	1,272
1985	1,063	25		527	0	0	979	0	771	871
1986	1,017	872	73	327	1,778	145	2,796	290	327	908
1987	1,987	711	116	88	1,610	334	1,726	44	319	1,639
1988	2,349	937	0	578	1,847	218	1,070	28	303	1,762
1989	2,846	507	11	357	1,116	385	1,708	28	368	2,372
1990	3,237	387	6	330	1,537	504	478	0	465	2,358
1991	3,208	684	41	305	1,519	288	575	47	230	2,025
1992	8,884	1,023	16	592	2,663	1,033	3,078	101	365	3,338
1993	8,626	1,200	38	531	2,300	633	4,054	9	280	4,729
1994	5,980	745	78	562	1,349	361	3,111	108	297	2,144
1995	2,742	436	18	397	746	226	1,004	0	132	2,126
1996	2,690	896	21	128	1,397	437	1,612	22	53	3,585
1997	3,135	699	10	30	550	298	2,181	30	53	3,800
1998	2,793	546	15	226	700	348	1,471	83	116	3,846
1999	4,988	1,344	83	142	2,558	371	3,279	134	11	3,701
2000	3,782	578	160	561	851	258	1,728	223	472	2,740
2001	4,573	941	74	238	1,420	160	2,646	65	93	2,866
2002	3,591	580	217	115	928	403	2,026	35	38	2,616
2003	3,922	510	373	26	1,284	350	1,242	167	154	1,276
2004	2,818	445	125	23	914	335	1,071	0	25	2,473
2005	2,466	621	112	394	878	150	1,328	287	205	1,960
2006	2,141	449	210	264	707	27	1,672	97	211	1,561
2007	2,258	870	223	190	964	31	1,294	0	0	2,476
2008	1,101	505	237	30	589	134	1,188	46	431	1,479
2009	499	85	212	17	393	0	257	0	0	1,982
2010	218	169	214	0	153	0	371	26	56	1,013
2011	282	33	172	0	213	0	362	0	16	1,087
2012	13	0	8	0	0	0	13	0	0	113
2013	0	0	0	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0	0	0	0
2010-2014										
Mean	103	40	79	0	73	0	149	5	14	443
2015	0	0	0	0	0	0	0	0	0	0

* Talkeetna River and tributaries including Clear Creek.

Andy Couch data request tables.pdf

Coho Salmon effort, harvest, escapement Jim Creek Drainage
1993 - 2006

	Effort	Harvest	McRoberts ^a Creek	Upper Jim Creek	Total Index	Weir Count
1993	6,824	2,878	503	535	1,038	5,532
1994	9,658	3,946	506	2,119	2,625	6,451
1995	10,893	3,549	702	1,288	1,990	
1996	7,561	3,911	72	439	511	
1997	5,349	1,786	701	563	1,264	
1998	5,272	4,197	922	560	1,482	
1999	6,860	2,612	12	320	332	
2000	10,975	5,653	657	2,561	3,218	
2001	13,028	8,374	1,019	575	1,594	
2002	17,989	14,707	2,473	1,630	4,103	
2003	13,474	6,415	1,421	393	1,814	
2004	19,342	11,766	4,652	1,045	5,697	
2005	19,605	10,114	1,464	1,883	3,347	
2006	25,271	19,259	2,389	1,750	4,139	
2007	21,342	11,848	725	1,150	1,875	
2008	27,874	17,545	1,890	1,029	2,919	
2009	16,486	11,573	1,331	1,193	2,524	
2010	16,140	8,442	242	420	662	
2011	9,810	3,132 ^b	261	229	490	
2012	7,474	1,858 ^b	213 ^c	495	708	
2013	8,474	3,258	663	1,029	1,692	
2014	9,376	3,045	122	618	740	
2015	3,425	2,910 ^b	571	374	945	3,572
2016		^b	106	307	413	1,764

2001-2010

mean 19,055 12,004 1,761 1,107 2,867

2011-2015

mean 7,712 2,841 366 549 915

^a SEG 450-700^b fishery restricted or closed early.^c foot survey conducted late.76%
Decline

October 18, 2016

Personal Alaska Board of Fisheries Testimony on Susitna Sockeye salmon status

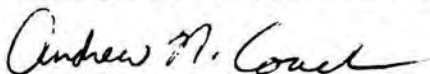
Chairman Jensen and Members of the Alaska Board of Fisheries.

My Name is Andrew Couch, I am a Sportfishing guide who works on multiple salmon streams in the Mat-Su Valley, I am also a member of the Matanuska Susitna Borough Fish and Wildlife Commission, and a member of the Matanuska Valley Fish and Game Advisory Committee. I am submitting this testimony as my own personal testimony in support of Nonregulatory Proposal F that was submitted by the Matanuska-Susitna Borough Fish and Wildlife Commission.

Proposal F seeks to elevate the Yield stock of concern designation for Susitna River sockeye salmon to a Management stock of concern designation or to revise the action plan to include stronger conservation measures. The current minimum escapement goal levels for each of the 3 Susitna drainage tributary weirs have only been achieved one time in the past 7 years. In addition inseason emergency sport fishing closures have occurred the past two years at Larsen Creek in efforts to attain adequate escapement goal needs, and the Shell Lake sockeye salmon population is on the verge of extinction. The Susitna sockeye salmon Yield stock of concern designation occurred back in 2008 — more than the 5 years mentioned in the Sustainable Salmon Fisheries Policy under which improvements should be seen.

In addition, because of budget cuts the Department eliminated Judd Lake weir sockeye salmon escapement counting from their 2016 budget, so documentation of inadequate escapements may have disappeared at this location — although low sockeye salmon production likely persists. Another troubling development is that during a time of low production, and failure to attain ADF&G identified spawning escapement minimum numbers, the Department is now suggesting that all 3 Susitna River sockeye salmon escapement goals should be reduced. Such a policy change could likely accelerate sockeye salmon declines in the less productive riparian sockeye salmon habitat within the drainage. I encourage the Board to take a broad look at sockeye salmon status throughout the Susitna River drainage and see if it does not indeed call for a designation of Management stock of concern or at least for more precautionary action plan measures.

Thank you for the opportunity to express my concerns,



Andrew N. Couch

Dear Board of Fish Members,

My name is Greg Brush and I am a passionate Kenai King salmon conservationist that has participated in the Alaska Board of Fish process for nearly three decades.

I'd first like to thank you for this opportunity to speak to you in person today. Taking the time to travel to our small town is much appreciated by myself and others that care deeply about our fisheries.

With that said, I'd like to encourage you to keep sustainability of our resource as priority one during this winter's Board of Fish hearings, avoiding the all-too-common "fish politics" and the influence of some organizations that push their own agendas. I believe that if we collectively put the fish first and remain conservative in our decision making, all users can benefit and more importantly, our children can enjoy our resources for generations.

In my opening line, I mentioned that I considered myself a conservationist. As you know, the root word of that is CONSERVE. Some people involved in this fishery unnecessarily feel threatened by my stance on conservation, particularly my support of hook and release fishing, thinking it translates to lost opportunity and even closures. Nothing could be farther from the truth.

Hook and release, and any true conservation measure, actually promotes and increases opportunity. Never forget; the word CONSERVE means the wise use, while PRESERVE means no use. My family and I enjoy eating wild salmon just as much as your family, and I am advocate for harvest fisheries...IF AND WHEN there is a clear harvestable abundance. But if there isn't, then being conservative with our mindset and actions is the only reasonable approach.

The last Board cycle, three years ago, I penned seven Proposals, all of which addressed Kenai king salmon conservation. This year, I have prioritized and condensed my suggestions, submitting just four.

Please know that we are still in a period of low abundance on the Kenai, despite what others might lead you to believe. While the last two years we have seen a slight up-tick in Kenai king returns, we are not out of the woods yet. Numbers are nowhere close to what they used to be and sadly the overall size of these special fish is far below what made the Kenai world famous. For these reasons, I am asking the Board to be pro-active this cycle, rather than re-active.

My first proposal, Number 147, addresses the fact that our Early Run Kenai king salmon fishery in May-June has been closed to all angling for many years, allowing zero opportunity for anglers. Last year, the early run sport fishery was suddenly opened and quickly liberalized to a full-harvest fishery, going from a long "red light" to a full-throttle "green light" in less than two weeks. I believe the Board should adopt a more logical "step up" plan where the fishery automatically opens every spring to an ultra-conservative single hook, no bait, hook and release fishery and then progresses to a "catch and keep" fishery ONLY when returns guarantee a harvestable surplus. Once the escapement goal is met and exceeded, then and only then can fish be kept. If the Board were to adopt this logical "Step Up" proposal, anglers would have predictability and more importantly, the Department would have a more conservative plan that greatly minimizes mortality, ensuring sustainability for the future.

My second proposal, Number 161, is very similar, addressing inconsistencies between early run and late run Kenai King salmon management. Like my first proposal, this one asks the Board to consider adopting a more logical "Step Up" management philosophy for the late run, whereas the in-river sport fishery

begins July 1 with a conservative single hook, no bait, "hook and release" fishery until the run shows adequate numbers that ensure we will meet and exceed our escapement goal, at which time liberalizations can occur. These changes would provide for a more consistent, predictable and sustainable fishery for the future.

My third proposal, Number 158, also addresses Kenai king salmon conservation. It simply asks the Board to consider making changes to an annual bag limit of early and late run Kenai kings that has not changed in decades, despite our present period of low abundance. Presently, when harvest is allowed, Kenai king anglers can take two kings of any size annually, as if these special salmon were just as plentiful and just as large as they once were.

My suggestion is a more reasonable "over/under" two fish limit that would still provide anglers the opportunity to take two fish annually; however, one would have to be a smaller fish while the other could be an "any fish" size. In this way, the harvest of two large four or five ocean fish per person would be prohibited. These are the fish that the department has shown to be in decline and the very salmon that we badly need on our spawning beds to pass on their unique genes. By adopting this proposal and implementing this more conservative "over/under" bag limit year round, total fish harvested will drop, more small fish would be harvested, and less large fish would be harvested, in effect spreading harvest over all ages classes, addressing an alarming increase in small fish numbers and an even more alarming decrease in big fish numbers. Again, adoption of this proposal would provide more protection to these special fish without restricting opportunity.

I'd also like to show support for Proposal Number 150, by Mark Wackler. This proposal mirrors my Proposal 161, whereas we stop harvesting fish prior to having a good idea how the run will shape up. Clearly Mr. Wackler also wants "fish for the future", requesting changing the irresponsible management of opening the late run Kenai king sport fishery on July 1 to a full-harvest fishery to a more logical, conservative and sustainable practice of starting with single hook, no bait, and hook and release fishing.

So you see, there are others that can put their personal needs aside and put the fish first.

In sum, I'd respectfully ask the Board to put fish politics aside and avoid the "tit for tat" Sport vs. Commercial game that I've seen repeat itself at these meetings over the past thirty years. Please be proactive in your decisions and conservative in your actions, treating our beloved Kenai kings like the genetically-unique, limited-in-quantity fish that they are and making the necessary changes that says "they are special" and thereby provides sustainability for the future.

Thank You.

Greg Brush
(907) 262-6169
fishme@ezlimit.com

BOF members,

Included in this packet are 3 documents:

- Kenai River guide numbers and statistics showing declining numbers of registered operators.
- Early and late run Kenai King Salmon abundance 1986-2012 showing historic low abundances.
- Age composition of both early and late run Kenai River King Salmon showing the most environmentally and economically valuable (5 ocean/7 year old) fish recently making up an extremely low percentage of the run.

*** My reasoning for submitting these documents is to show that your focus clearly needs to be on creating a more conservative, logical, fish-first oriented management plan for our special Kenai and Kasilof wild King Salmon - rather than attacking a problem that doesn't need fixing i.e. guide pressure.

Thank you for your consideration,

Mark Wackler

180 Sierra Heights St. Soldotna, AK 99669

907-394-8378

akfishology@gmail.com

DRAFT

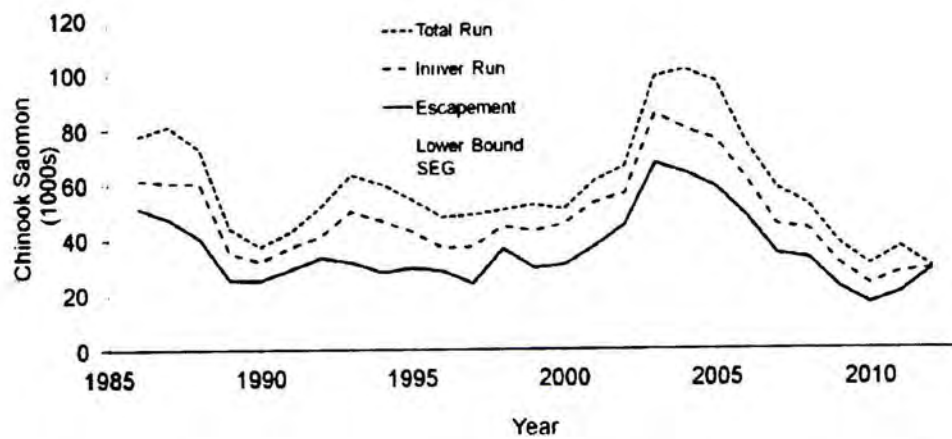


Figure 13.—Posterior medians of spawning escapement (solid line), inriver run abundance (long dashed line), and total run abundance (short dashed line) from 1986 to 2012 obtained from fitting a state-space model to late-run Kenai River Chinook salmon data.

KENAI KING L.R. - AGE COMP -

Table 235-2.- Percentage of total run by age class for Kenai River late-run king salmon, 1986 - 2010.

Year	Age Class				
	1.1	1.2	1.3	1.4	1.5
1986	0.3	15.1	42.0	38.4	4.2
1987	0.8	5.7	29.4	63.0	1.1
1988	0.7	3.3	6.1	75.9	13.8
1989	0.4	11.3	14.6	62.2	11.5
1990	0.2	14.3	16.5	64.3	4.7
1991	0.1	9.7	18.0	66.3	6.0
1992	0.7	8.7	19.0	68.6	2.9
1993	0.6	8.9	15.2	69.8	5.4
1994	1.0	7.3	12.0	75.2	4.5
1995	0.7	22.4	23.2	47.9	5.7
1996	1.2	10.2	34.2	53.3	1.1
1997	1.9	6.4	23.9	66.3	1.5
1998	1.6	16.0	15.0	64.4	3.0
1999	0.6	14.8	22.2	58.1	4.3
2000	0.9	4.6	32.0	60.1	2.4
2001	2.1	16.7	18.1	60.7	2.4
2002	3.8	19.6	22.1	51.8	2.8
2003	2.0	35.7	20.9	40.6	0.8
2004	2.3	16.7	30.1	49.6	1.2
2005	1.0	13.6	19.1	63.1	3.2
2006	3.6	27.1	15.8	45.6	8.0
2007	1.2	25.5	27.3	39.4	6.7
2008	3.4	9.5	22.2	58.4	6.6
2009	3.3	33.9	11.8	47.7	3.4
2010	5.7	20.6	34.3	33.8	5.5
	2.8	30.6	20.2	44.4	1.9
Average (1986 - 2011)	1.6	15.1	21.8	57.0	4.5

← 5 ocean / 7 YR.

Data from this year is preliminary and not final until published.

KENAI KING E.R. - AGE COMP -

Table 235-2.- Percentage of total run by age class for Kenai River early-run king salmon, 1986 - 2011.

Year	Age Class				
	1.1	1.2	1.3	1.4	1.5
1986	0.1	15.5	42.0	34.5	7.8
1987	0.5	1.5	38.4	57.3	2.2
1988	0.4	1.8	15.8	71.3	10.7
1989	0.0	4.1	15.5	71.0	9.4
1990	0.0	7.2	26.6	59.8	6.4
1991	0.0	7.3	22.4	65.1	5.2
1992	0.0	8.1	28.5	58.1	5.3
1993	1.2	4.0	28.0	63.2	3.6
1994	1.5	3.5	20.0	70.7	4.2
1995	0.4	4.9	20.4	69.8	4.4
1996	0.0	7.9	28.7	61.3	2.1
1997	0.0	4.2	34.8	59.9	1.1
1998	0.0	18.9	36.8	41.1	3.2
1999	0.3	8.0	53.7	37.7	0.3
2000	1.1	8.4	43.4	46.5	0.6
2001	1.0	16.2	27.8	53.0	2.0
2002	3.9	15.7	37.3	39.5	3.6
2003	1.1	31.4	19.8	46.8	1.0
2004	1.1	14.8	33.3	46.4	4.3
2005	1.1	12.4	30.2	52.8	3.5
2006	1.3	30.6	19.4	45.1	3.7
2007	0.0	26.3	27.7	43.2	2.8
2008	0.1	13.7	42.1	42.3	1.8
2009	3.1	14.8	24.2	56.3	1.6
2010	6.9	25.1	47.5	20.0	0.5
	1.6	25.8	30.8	40.7	1.1
Average (1986 - 2011)	1.0	12.8	30.6	52.1	3.6

← 5 ocean / 7 YR. FISH

██████ Data from this year is preliminary and not final until published.

**KENAI RIVER
COMMERCIAL OPERATOR TRENDS AND NUMBERS
1982-2015**

YEAR	TOTAL FISHING		MOTORIZED GUIDES		DRIFT GUIDES		NON FISHING		RESIDENT		NON RESIDENT		GUIDES TOTAL	OTHERS *
2015	258	78%	226	68%	106	32%	74	22%	222	67%	110	33%	332	22
2014	267	79%	239	71%	97	29%	69	21%	230	68%	106	32%	336	22
2013	284	81%	259	74%	91	26%	66	19%	249	71%	101	29%	350	17
2012	301	85%	279	79%	74	21%	52	15%	252	71%	101	29%	353	17
2011	319	84%	297	78%	82	22%	60	16%	279	74%	100	26%	379	20
2010	316	87%	300	83%	62	17%	46	13%	273	75%	89	25%	362	20
2009	338	88%	322	84%	62	16%	46	12%	293	76%	91	24%	384	21
2008	380	92%	361	88%	51	12%	32	8%	306	74%	106	26%	412	18
2007	396	93%	372	88%	53	12%	29	7%	312	73%	113	27%	425	19
2006	396	91%	369	84%	68	16%	41	9%	332	76%	105	24%	437	
2005	365	90%	324	80%	83	20%	42	10%	323	79%	84	21%	407	
2004	352	92%	303	79%	81	21%	32	8%	317	83%	67	17%	384	
2003	339	90%	301	80%	74	20%	36	10%	297	79%	78	21%	375	
2002	348	91%	304	79%	79	21%	35	9%	291	76%	92	24%	383	
2001	335	90%	296	79%	78	21%	39	10%	287	77%	87	23%	374	
2000	341	90%	300	79%	80	21%	39	10%	296	78%	84	22%	380	
1999	329	89%	288	78%	80	22%	39	11%	295	80%	73	20%	368	
1998	325	90%	278	77%	82	23%	35	10%	292	81%	68	19%	360	
1997	354	89%	312	78%	88	22%	46	12%	306	77%	94	24%	400	
1996	335	89%	292	78%	83	22%	40	11%	287	77%	88	23%	375	
1995	314	88%	263	74%	94	26%	43	12%	260	73%	97	27%	357	
1994	257	85%	214	70%	90	30%	47	15%	224	74%	80	26%	304	
1993	222	84%	194	74%	69	26%	41	16%	196	75%	67	25%	263	
1992	238	87%	212	77%	63	23%	37	13%	194	71%	81	29%	275	
1991	290	92%	229	73%	86	27%	25	8%	214	68%	101	32%	315	
1990	310	94%	243	74%	87	26%	20	6%	234	71%	96	29%	330	
1989	292	94%	215	69%	97	31%	20	6%	212	68%	100	32%	312	
1988	252	94%	184	69%	84	31%	16	6%	191	71%	77	29%	268	
1987	222	96%	155	67%	77	33%	10	4%	188	81%	44	19%	232	
1986	187	94%	138	70%	60	30%	11	6%	148	75%	50	25%	198	
1985	160	94%	131	77%	40	23%	11	6%	131	77%	40	23%	171	

* OTHERS INCLUDE: Owners =13, Boat Rentals=5, Vehicle Shuttle =2 (with 10 employees), Guided Kayak Tours=1, Canoe and Raft Rental= 1 and Horseback=1 ,

UPDATED 09/27/15

2015 ADDITIONAL STATISTICS

- 33%, which is 109 of the currently registered guides, have been registered for 15 or more years on the Kenai River.
 - 104 are fishing guides, 86 are residents and 18 are non-residents.
 - 5 non-fishing guides, 4 are resident and 1 are non-residents
- 12%, which is 40 of the currently registered guides, have been registered for between 10 to 14 years on the Kenai River.
 - 39 are fishing guides, 34 are residents and 5 are non-residents.
 - 1 non-fishing guides, 0 is resident and 1 are non-residents.
- 15%, which is 49 of the currently registered guides, have been registered for between 5 to 9 years on the Kenai River.
 - 45 are fishing guides, 31 are residents and 14 are non-residents.
 - 4 non-fishing guides, 1 are resident and 3 is non-resident.
- 18%, which is 61 of the currently registered guides, have been registered for between 2 to 4 years on the Kenai River.
 - 42 are fishing guides, 17 are residents and 25 are non-residents.
 - 19 non-fishing guides, 13 are resident and 6 are non-residents.
- 14%, which are 45 of the currently registered guides were new in 2014.
 - 26 are fishing guides, 11 are residents and 15 are non-residents.
 - 19 non-fishing guides, 3 are resident and 16 are non-residents.

Breakdown of the 41 "new guides" for the 15 season:

- 38 are working for existing businesses. 19 of the 38 are non-fishing.
- 7 opened new guide businesses. 7 are fishing and 0 are non-fishing.

Other Information:

- 8% which are 27 of the currently registered as owners, vehicle shuttle operators, guided kayak and canoe and raft rental and tours and horse back services.

Breakdown of the 61 guides who did not register for the 15 season:

- 25 Single owner/guide operator businesses. 20 were fishing guides.
 - 12 Had been in business for more than 10 years.
- 36 Were employees of other businesses
 - 24 Were fishing guides.
 - 12 Were non-fishing guides.
- 16 of the 61 guides who did not register for the 15 season were first year.
 - 9 Were non-fishing guides.
 - 7 Were fishing guides.

Kenai River Guides Registered in other Peninsula State Parks

- | | | |
|-------|---|-----------|
| ➤ 31 | Kenai River guides are registered to use Deep Creek SRA. | Down 1 |
| ➤ 135 | Kenai River guides are registered to use Kasilof SRS. | Up 3 |
| ➤ 22 | Kenai River guides are registered to use Anchor River SRA. | Down 1 |
| ➤ 4 | Kenai River guides are registered to use Resurrection Bay. | Up 2 |
| ➤ 2 | Kenai River guides are registered to use Kachemak Bay. | No Change |
| ➤ 0 | Kenai River guide are registered to use Prince William Sound. | Down 1 |

Kenai River Boat Information

- 394 boats were registered on the Kenai, 249 were power boats; 104 were drift only boats; 35 were drift boats with kickers and 6 rafts.

Support Proposal 133

October 16, 2016

The reasons I submitted this proposal are both to reduce the amount of gear (nets) fished and to help reduce the problems occurring between two permit holders (skippers) fishing on the same boat under permit stacking -

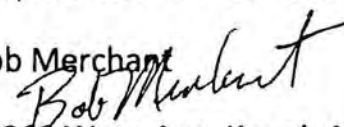
Additionally, there is the potential for a greater economic benefit to the fisher of two entry permits who would be allowed to fish a fourth net.

If the Board adopts proposal 133 into regulation the result could eventually reduce the number of boats fishing by half, though, owing to the number of permits now actively fishing, a reduction to half is not likely any time soon. Presently, there are issued 569 drift permits. When two permits are combined on one boat the total nets fished is reduced by two nets. Each permit allows three 50 fathom nets (300ft) or 900 ft of gear fished per boat. After the passage of Proposal 127 the result would calculate to two permits per boat fishing four 50 fathom or 1200 ft per boat. Full consolidation potentially brings a net result of a 50% reduction in boats to 285, fishing two thirds of the nets presently in the water on any opening, which results in a 33% reduction of nets.

Also, when there are two skippers commercial fishing on the same boat the responsibility for how the gear is fished becomes problematic because each skipper is equally responsible for any violation but in practice only one skipper decides whether or not to make a set. This situation exists with the present regulation. Adopting Proposal 133 will relieve the necessity for two permit holders (both skippers) to have to fish together on the same vessel.

Proposal 133 will benefit the drift fishery in Cook Inlet.

Bob Merchant


36260 Wren Ave, Kenai, Alaska



Submitted By
Stanley R Steadman
Submitted On
9/16/2016 4:07:55 PM
Affiliation
no affiliation- sport fisherman

Phone
9072622365
Email
sego56@hotmail.com
Address
178 W RIVERVIEW AVE
Soldotna, Alaska 99669

Thank you for the opportunity to comment. I have been fishing on the Kenai River for 30 years and live in Soldotna. Over the years I have seen the numbers of Out of State fishermen skyrocket. With this happening it has been more and more difficult for local families to find a place to fish from the bank, unless we want to get on the river at 5 a.m. and often "wait in line for someone to leave." It used to be that we could head out after work with family and enjoy an evening of fishing. That time has passed. It is particularly difficult to find a place to fish when the minimum escapement level has been reached and the limit goes to six fish. Fishermen from out of the area are not going to leave their spots until they have caught their six, making it all the more difficult to find a spot. My suggestion would be to come up with a management plan that keeps the catch limit at three fish. Also, in one area I like to fish, the Kenai River Center, there is always the same group of German's who catch their limit in the morning, come back and catch it again after lunch, and then give it one more shot after dinner. I know this because I like to go in the morning (I practice the one and done approach—1 fish and go home), then try it again in the evening. This approach didn't work well this year, because I could not stay all morning or evening to find a spot. I would suggest Fish and Game target key spots to nail these out of state fishermen. Thanks



Submitted By
David D Athearn
Submitted On
10/1/2016 5:16:09 AM
Affiliation
Retired sport fisherman

Phone
907 321 3678
Email
athearn@gci.net
Address
4237 Marion drive
Juneau, Alaska 99801

I am a 73 year old, 40 year residence of Alaska. I suggest that seniors be allowed to use bait in fresh water as well as children under the age of 16. It is very difficult to hike up and down streams at my advanced age and being allowed to use bait would increase my chances of catching my winter supply of fish while staying close to my vehicle. I feel this would have minimal impact on the fresh water fisheries and be a good accomadation to older Alaskans. Thanks for considering my proposal.



Submitted By
Terry Nininger
Submitted On
10/1/2016 10:27:45 AM
Affiliation

Phone
907-357-1606
Email
nininger@alaska.net
Address
P.O. Box 877944
Wasilla, Alaska 99687

RE: Letter of Support for EF-F16-037: Establish Shell Lake As A Conservation Concern

In the interest of rehabilitating the Shell Lake sockeye adult escapement and smolt emigration, Shell Lake should be classified as a stock of *conservation concern*, (Sustainable Salmon Fisheries Policy, (SSFP), 5 AAC 39.222 (f) (6), "conservation concern"). In recent history there has never been a greater need to restore a salmon population than what currently exists at Shell Lake.

Adult escapement into Shell Lake has dropped from 69,800 in 2006 to 215 fish in 2016. Out migrating smolt has dropped from 80,600 in 2007 to 12 fish in 2016. It is only because of the efforts by a private organization, Cook Inlet Aquaculture Association, (CIAA), that there are any remaining sockeye in Shell Lake.

As referenced in the SSFP, "conservation concern means concern arising from a chronic inability, despite the use of specific management measures, to maintain escapements for a stock above a sustained escapement threshold (SET)". Yes, "a conservation concern is more severe than a management concern". A conservation concern has rarely, if ever, been used by the BOF but the Shell Lake issue is unique. Previous management efforts have failed to address the complete collapse of this run. Based on euphotic volume, the estimated adult sockeye salmon potential production in Shell Lake should be 10.3% of the entire Susitna River drainage.

The sockeye problem at Shell Lake is complex. Certainly, the pike population is a primary factor, as is the presence of disease and beavers. But that does not take away from the need for an action plan that precludes further harvest of sockeye. You cannot maintain the same level of harvest and still reduce the mortality factor. Additionally, the action plan should include further understanding of what can be done to reinstate the salmon population.

The Alaska Board of Fisheries needs to take a bold and unprecedented position to declare the Shell Lake sockeye a stock of conservation concern. In the short term this may compromise the interests of sports and personal use fishermen and commercial fishermen, but in the long run it is the only action that will return this fishery to its original and natural state.

Terry Nininger



Dear Esteemed Board of Fish Members,

As a 40yr plus resident of the Kenai Peninsula I would like to give you some of my comment concerning a few of the proposals for this up coming 2017 Board of Fish Upper Cook Inlet meeting in early 2017. I would also like to give you some input as to my thoughts concerning Sports Fishing and Personal Use Fishing on the Kenai River since the last BOF Upper Cook Inlet meeting in 2014 from my own personal experiences in both of these fisheries. I am sending in this public comment because I will be unable to attend the BOF meeting at the Soldotna Sports Center on Oct. 18th due to a Kidney Stone medical issue to take place during the time frame the BOF is excepting Public Comment in Soldotna at its Sports Complex.

I want to thank the members of the Board of Fish for their time, effort and diligence they put forth to try and make all the decisions requested of them in order to make a fair and equitable fishery for all user groups, Thank You. Kenny Bingaman, PO Box 2163, Soldotna, Alaska. 99669.

This is my Public Comment for the following Upper Cook Inlet Proposals;

#87--- Amend Central District Drift Gillnet Fishery Management Plan to maximize commercial harvest of sockeye salmon, as follows: (a) The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District and Kenai River Coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of in river restrictions. The thought process expressed by this section (a) is important and there seems to be some double talk by the proposal author as to what his real wants are. However, or whatever this proposal really would entail, **it is very important that the BOF does more in an effort to protect and enhance the Coho Salmon fisheries in all of the river of Cook Inlet.** And that is the idea I **SUPPORT.**

#88--- Remove restrictions to the commercial drift gillnet fishery, so that the fishery would occur during two inlet-wide fishing periods based on test fishery and escapement data.

I feel that the current restrictions to the Comm Fish Drift Gillnet Fishery are antique and feel no changes should be made.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#89--- Repeal and readopt Central District Drift Gillnet Fishery Management Plan with the amended plan removing mandatory time and area restrictions from July 1–August 15

I DO NOT AGREE OR SUPPORT THIS PROPOSAL



#90--- Remove restrictions on the commercial drift gillnet fishery from July 1–31 and manage the drift gillnet fishery based on in season salmon abundance

The current plan is working very well.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#91--- Remove area restrictions imposed on the commercial drift gillnet fishery during July 9–15 and 16– 31 time period.

I see no advantage for Cook Inlet bound King Salmon with this proposal.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#92--- Restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15.

I feel it is important to get as many Coho Salmon to the rivers of Upper Cook Inlet as possible.

I SUPPORT THIS PROPOSAL

#93--- Amend preamble of management plan and restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1-15.

While I do support getting more Coho Salmon to the northern district streams, I do not support it at the detriment of returning Coho to the Kenai and Kasilof rivers.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#94--- Remove the one-percent rule, as referenced to both the set and drift gillnet fisheries, from the Drift Gillnet Management Plan.

I feel the 1% rule has worked very well in getting Kenai River returning King Salmon into the river and should not be changed.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#95--- Restrict commercial drift gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1–15.

This proposal is much like #93 and says the following: *Note: under this proposal even if the drift fishery was restricted under the 1 % rule, ADF&G could still allow the fleet to fish 7 days per week (5 days per week in the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections.* I feel that this proposal would take Coho out of the Kasilof and Kenai River drainages. This Coho stock is depleted and should be listed as a stock of concern. There are no where near the numbers of Coho Salmon in the Kenai and Kasilof Rivers that there were even 20yrs ago.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#96--- Allow commercial fishing with drift gillnets in all waters of the Central District, except the Kenai and Kasilof Sections, from August 16 until closed by emergency order.

This just increases the amount of time Comm Fish Drifters are allowed to fish at the detriment of all other user groups.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL



#97--- Repeal the drift and set gillnet one-percent rules that apply to from August 1-15.

This proposal is the same as #94.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#98--- Reduce sport fishery bag limit for Coho salmon on the west side of Cook Inlet and close drift gillnet fishing in Areas 3 and 4 for remainder of season if Coho salmon sport fishing is restricted or closed in the Little Susitna River.

I would like to see more Coho make it to Northern district rivers.

I SUPPORT THIS PROPOSAL

#99--- Amend management plan to remove all restrictions and manage the commercial set gillnet fishery to harvest surplus Kasilof River sockeye salmon.

This proposal would devastate the numbers of returning Kenai and Kasilof King Salmon and is not viable.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#100--- Open the commercial set gillnet fishery in the Kasilof Section as early as June 20 if the department estimates 50,000 sockeye salmon will be in the Kasilof River before June 25.

This proposal would make it a guessing game for ADF&G and would make a big impact to returning King Salmon numbers in both the Kasilof and Kenai Rivers. It would impact Sport Fishing people.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#101--- Allow commercial fishing with set gillnets within 600 feet of shore in the Kasilof Section, with fishing time occurring 600 feet or less offshore not subject to the hourly restrictions in the Kenai River Late-Run Sockeye Salmon Management Plan.

This proposal would hurt all returning King Salmon to the Kenai River.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#102--- Amend management plan to allow commercial fishing with set gillnet gear in the Kasilof Section within one-half mile of shore and eliminate the provision allowing commercial fishing with set gillnet gear only within 600 feet of shore in the Kasilof Section.

This proposal is much like the previous one, #101.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#103--- Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 and adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7.

This proposal would aid in returning numbers of King Salmon to the Kasilof and Kenai Rivers. That would be a good thing.

I SUPPORT THIS PROPOSAL



#104--- Reduce the closed fishing period or “window” and increase additional fishing time with set gillnet gear in the Kasilof Section prior to July 9.

This proposal would hurt returning King Salmon numbers to the Kasilof and Kenai Rivers.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#105--- Allow commercial fishing with set gillnet gear in the North Kalifonsky Beach statistical area (NKB - stat area 244-32) when the upper end of the Kasilof sockeye salmon escapement goal range is projected to be exceeded.

This proposal would increase Comm Fish Set Net opportunity to the detriment of Kenai River King Salmon numbers entering the Kenai River.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#106--- Replace the optimum escapement goal with the sustainable escapement goal for Kasilof River sockeye salmon.

This proposal would affect the current management plan and there is no biologic data to support changing this escapement goal at this time. If anything it should be raised to over 500,000 sockeye. We are talking about the largest lake on the Kenai Peninsula, the escapement goal on the Kenai River is much higher and there is a much smaller lake, Hidden Lake, they go to and it is big enough for 1.4 million, then why is it that Tustumena Lake does not have a larger escapement goal, it is 20 times larger than either Skilak or Hidden Lakes.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#107--- Replace the optimum escapement goal with a sustainable escapement goal for Kasilof River sockeye salmon.

Same as #106.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#108--- Replace the optimum escapement goal with the current biological escapement goal for Kasilof River sockeye salmon.

Again this is the same as #106.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#109--- Provide clarification on the use of gear in the Kasilof River Special Harvest Area (KRSHA) for individuals who hold two Cook Inlet set gillnet Commercial Fisheries Entry Commission (CFEC) limited entry permits.

This proposal sounds reasonable.

I SUPPORT THIS PROPOSAL

#110--- Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one gillnet per limited entry permit held.

I SUPPORT THIS PROPOSAL



#111--- Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one set gillnet per limited entry permit held.

I SUPPORT THIS PROPOSAL

#112--- Allow holders of two Commercial Fisheries Entry Commission set gillnet limited entry permits to fish two set gillnets in the Kasilof River Special Harvest Area.

It is already to crowded for each permit holder to fish more than one net per permit.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#113--- Remove restrictions on the amount of drift or set gillnet gear a vessel may have on board within the Kasilof River Special Harvest Area.

I feel the current amounts of gear allowed on board is sufficient.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#114--- Require all nets, buoys, ropes and anchoring devices to be removed from the Kasilof River Special Harvest Area when this area is closed to commercial fishing.

I SUPPORT THIS PROPOSAL

#115--- Define the boundary that separates set gillnet from drift gillnet gear in the Kasilof River Special Harvest Area (KRSOA), and define the outside boundaries of the KRSOA.

This is common sense.

I SUPPORT THIS PROPOSAL

#116--- Review the optimum escapement goal (OEG) and in river goals for Kenai River late-run sockeye salmon.

ADF&G who sponsors this proposal has worded it tricky. They are saying this; *The OEG and in river goals are currently out of alignment. The upper tier of the in river goal (upper bound of 1,350,000) does not provide enough fish on the upper end to adequately distribute escapements throughout the OEG range and in river goals. Managing for the current multiple goals (in river goal and OEG) can be unnecessarily complicated in season and confusing to user groups when one goal is met and the other is not.*

If the in river goals are aligned with the OEG, the board may also wish to consider simplifying the management plan by removing the OEG from regulation. The department currently manages for both OEG and in river goals, and, if aligned, the two goals seem to be redundant.

While there are many factors involved in managing the Escapement Goals on the Kenai River, ADF&G manages these goals with a stacked deck. For instance this year in 2016, when it was clear that the Sockeye run was over, they were still counting upwards of 20 to 25,000 fish a day that were Pinks as Sockeyes. The counts even during July did not reflect Comm Fish boat test net counts, in river sport fishing counts or personal use take counts. The Sockeye sonar counter must be seriously flawed, at best have some



very substantial short comings. Having Comm Fish people logging the counting makes it untrustworthy at best as the more they count, the more Comm Fish gets to take from the resource. I think the first issue to be solved would be to put unbiased people or over sight people in the sonar counter shacks and see if the numbers fluctuate much differently for a few years. The current system is in need of much repair in order to make sure accurate counting takes place. But this proposal might take away some confusion.

I SUPPORT THIS PROPOSAL

#117--- Amend the Kenai River Late-Run Sockeye Salmon Management Plan to remove the optimum escapement goal for Kenai River late-run sockeye salmon. Clearly this would be a major mistake and could quite possibly undermine the efforts of ADF&G, no matter how limited or inaccurate they may be at this time, it is all we got.
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#118--- Remove the optimum escapement goal for Kenai River late-run sockeye salmon and add the guided sport fishery to the list of fisheries managed under the plan.

This proposals wording is a smoke and mirrors job by trying to spot light guided sport fishermen when in reality it is just another attempt to toss out the escapement goals in existence.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#119--- Amend management plan to achieve in river goal range of 850,000–1,050,000 late-run sockeye salmon at run strengths less than 2.3 million sockeye salmon and 950,000–1,150,000 late-run sockeye salmon at run strengths greater than 2.3 million sockeye salmon.

All this proposal does is muddy up the current management escapement goal.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#120--- Decrease the in river goal ranges for late-run Kenai River sockeye salmon by 100,000 fish and limit the bag and possession of sockeye salmon to three per day and three in possession in the Kenai River sport fishery.

This proposal is redundant in the fact that the sport bag limit is already 3 fish except in times of extraordinary large runs when it is raised to 6 fish a day and only then in order to use that as an additional management tool to prevent over escapement. The 100,000 fish reduction plays no part in furthering the species, only in letting Comm Fish users more access to the resource. For that reason

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#121--- Repeal and readopt management plan to remove the optimum escapement goal, mandatory restrictions and closed fishing periods or "windows", and specify that management will be based on the abundance of late-run Kenai River sockeye salmon.

#122--- Remove mandatory closed fishing periods or "windows" from the Upper Sub district commercial set gillnet fishery.



Both of these proposals are basically the same and are greed driven by Comm Fish Set Netters. We need Escapement Goals to ensure the survival of our salmon species and we need Comm Fish closure "windows" to ensure that Kenai River bound King Salmon make it into the river. Only common sense!

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#123--- Repeal and readopt the management plan to allow for the commercial harvest of surplus pink salmon in the Upper Sub district with set and drift gillnet gear.

#124--- Amend the Cook Inlet Pink Salmon Management Plan to remove or lower the daily harvest triggers.

#125--- Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery.

#126--- Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery.

All of these proposals are close to the same. The current Pink Salmon Management Plan is working and viable. The allowing of a larger mesh for these fish would impact Kenai River King Salmon mortality resulting in more Kings being killed when we need them to make it into the river.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#127--- Remove in river goals from the list of escapement goals in the Upper Cook Inlet Salmon Management Plan and realign in river and escapement goals in the Kenai River Late-Run Sockeye Salmon Management Plan.

While researching this proposal, I have come to the conclusion it is close to one submitted by ADF&G, #116. Elimination of any confusion is a good thing. Plus, in river is not on spawning beds to say.

I SUPPORT THIS PROPOSAL

#128--- Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan.

This proposal is vague at best and asks the BOF to come up with an entirely different management plan with no direction or input in the proposal.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#129--- Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan.

This proposal seems to ask for a change in Allocation which is not legal and is a very subjective request.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#130--- Amend Upper Cook Inlet Salmon Management Plan so that fishery restrictions on fully allocated stocks of concern are shared among all user groups in proportion to the respective user group harvest of that stock.



I SUPPORT THIS PROPOSAL

#131--- Define commercial fishing statistical areas in the Upper Sub district set gillnet fishery.

#132--- Move the southwestern-most point of the Expanded Kasilof Section 1.2 nm west so it aligns with the northwestern-most point of the Expanded Anchor Point Section.

#133--- Allow a single person holding two Commercial Fisheries Entry Commission Cook Inlet drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS.

#134--- Remove restrictions in the Upper Sub district commercial set gillnet fishery and allow for regular weekly fishing periods through July 20 with additional fishing periods based on in season abundance.

The restrictions in place are there to protect King Salmon.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#135--- Redefine sections and manage the commercial set gillnet fishery in the Upper Sub district with three sections with staggered opening dates.

This proposal will lead to confusion and much extra effort by all involved.

I DO NOT AGREE TO SUPPORT THIS PROPOSAL

#136--- Allow commercial fishing with set gillnets in the North Kalifonsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8.

This is an attempt to open the Kenai East Forelands Area for additional time when ever the Kasilof section is open.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#137--- Remove "one-percent rule", where the commercial set gillnet fishery will close after July 31, if less than one percent of the season's total sockeye is harvested in two consecutive fishing periods.

#138--- Remove the one-percent rule that applies to the commercial set gillnet fishery in the Upper Sub district after July 31 so that the set gillnet fishery will close August 15 and be managed using regular fishing periods from August 11 through August 15.

#139--- Repeal the one-percent rule, as it applies to the Upper Sub district set gillnet fishery so that the set gillnet fishery will close August 15.

Both of these proposals seek to gain more fishing time for Comm Fish. The 1% rule has been an effective solution to getting more King Salmon into the Kenai River.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#140--- Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135



fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth.

The 29 pane or mesh provision was put in place by ADF&G to protect inbound Kenai River King Salmon. It is a proven concept from Bristol Bay.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#141--- Limit the depth of all set gillnet gear in Upper Subdistrict of the Central District to no more than 29 meshes deep.

This proposal would allow many more King Salmon to reach their natal rivers and spawning beds, proven over time in Bristol Bay.

I SUPPORT THIS PROPOSAL

#142--- Close waters within one statute mile of the terminus of Kustatan, Drift, and Big rivers, and Bachatna Creek; as measured from mean lower low water, to commercial fishing.

This proposal would mimic what is current regulation on the East Side of Cook Inlet.

I SUPPORT THIS PROPOSAL

#143--- Increase the amount of smelt that may be taken in the Cook Inlet commercial smelt fishery from 100 tons to 200 tons annually.

I feel this would create a shortage for Residents to harvest smelt in Cook Inlet Rivers.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#144--- Require that when proxy fishing in Upper Cook Inlet, once a bag limit is taken the next legal bag limit must be retained.

I SUPPORT THIS PROPOSAL

#145--- Allow only barbless hooks in Upper Cook Inlet flowing waters closed to salmon fishing.

I SUPPORT THIS PROPOSAL

#146--- Require the use of circle hooks when fishing for sockeye salmon.

Ridiculous.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#147--- Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery.

#150--- Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention.

The current slot limit imposed is the right step toward getting Kenai River King Salmon numbers to grow.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#148--- Rewrite the Kenai River and Kasilof River Early-run King Salmon Management Plan to redefine early-run stocks and establish age- and sex-based escapement goal.



There is not factual based data to support this proposal
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#149--- Revise Kenai River and Kasilof River Early-run King Salmon Management Plan.

We need to do more for the Kasilof King Salmon before we loose them forever.
I SUPPORT THIS PROPOSAL

#151--- Repeal barbless hook provisions in Lower Kenai River.
I SUPPORT THIS PROPOSAL

#152--- Expand the dates to prohibit back trolling and tie to prohibition of bait.
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#153--- . Prohibit fishing for king salmon from markers 300 yards below Slikok Creek upstream to Skilak Lake.
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#154--- Expand the waters of the Kenai River closed to fishing for king salmon.
#155--- Expand the waters of the Kenai River closed to fishing for king salmon.
There is already the majority of the Kenai River closed to King Salmon fishing. It has also been closed for 3 straight years in May and closed 2yrs in June with only limited fishing in June of 2016.
I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#156--- Replace slot limit for Kenai River king salmon with maximum size limit to prohibit retention of king salmon greater than 42 inches in length.
Current slot limit regulations work great. Have not been able to fish for King Salmon in the Kenai River for 3yrs in May and 2 1/2yrs in June so it is redundant.
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#157--- Modify the annual limit of king salmon from the Kenai River to two fish, only one taken prior to July 1.
Again, no one has been able to retain a Kenai River King Salmon for the last 3yrs during the first run, redundant!
I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#158--- Modify the annual limit of two king salmon for the Kenai River to include only one large fish.

#166--- Modify season dates and area for Kenai River late-run king salmon management. July 8 – July 31: 1 per day, 1 in possession

The current regulations of being able to take one King Salmon per day with a possession limit of two per season is not asking to much. How about limiting the Salt Water King Fishery??

I DO NOT AGREE OR SUPPORT THIS PROPOSAL



#159--- Extend the time that the slot limit for Kenai River king salmon is in effect.
This is only needed at this time for the first run, ie; May and June. The 2nd run has reached the current escapement goal so there is no need for a slot limit there.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#160--- Prohibit the use of bait in the late-run Kenai river king salmon fishery until escapement goals have been met.

#163--- Prohibit bait on runs less than 22,000 and eliminate 12-hour fishing period restriction.

Both of these proposals basically say the same thing except #163 adds an elimination of current management regulation to add additional fishing time for Comm Fish ESSNs.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#161--- Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention.

According to current management plan, this would also close the Comm Fish Set Nets.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#162--- Establish an Optimum Escapement Goal (OEG) of 15,000 – 40,000.

I think it is prudent to increase the Kenai River King Salmon goals.

I SUPPORT THIS PROPOSAL

#164--- Repeals and readopts the Kenai River Late-Run King Salmon Management Plan.

#165--- Decrease the trigger for management actions on Kenai River late-run king salmon from 22,500 to 16,500.

164 further says; The department shall manage the late run Mainstream stock of Kenai River king salmon to achieve a sustainable escapement goal of 12,000-27,000 king salmon beginning June 23 as described in this section.

If this action were adopted it would seriously harm the returning numbers of Kenai River King Salmon, we should be **increasing** the escapement not lowering it.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#167--- Close the Kenai River personal use fishery when the late-run king salmon sport fishery is closed.

I feel that a fishery that is for the RESIDENTS of the state and only open to them for food for the winter should not be infringed upon under any circumstance.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#168--- Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery in July and August.

#169--- Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery in July and August

I feel this is an attempt to increase Comm Fish take at the expense of both the Sport and Personal Use fisheries.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS



#170--- Reconsider “paired” restrictions to the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery.

#171--- Remove the commercial set gillnet fishery in the Kasilof Section from “paired” restrictions in the Kenai River Late-Run King Salmon Management Plan.

#172--- Remove “paired” restrictions in the Kenai River sport and personal use fisheries and the Upper Sub district commercial set gillnet fishery.

#173--- Decrease the projected in river run goal of late-run king salmon to 19,000 fish and remove the Upper Sub district commercial set gillnet fishery from “paired” restrictions.

#174--- Remove provisions (e)(3)(A)(i) and (ii) that restrict the number and/or depth of commercial set gillnets fished by a Commercial Fisheries Entry Commission limited entry permit holder in the Upper Sub district if the use of bait is prohibited in the Kenai River sport fishery.

#175--- Clarify the length and depth of set gillnets that may be used in the Upper Sub district commercial salmon fishery, if the use of bait is prohibited in the Kenai River sport fishery.

#176--- Allow commercial set gillnet fishing periods in the Kenai and Kasilof sections to be managed separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery.

#177--- Allow commercial fishing periods in the Kasilof and Kenai/East Forelands sections to be opened separately, with regard to “paired” restrictions, if the use of bait is prohibited in the Kenai River sport fishery.

All eight of these proposals are centered on GREED by Comm Fish Set Net fishermen. Like they don't get their share already. Paired restrictions is the only fair way to manage this resource that belongs to all the people of the State of Alaska. If one fishery is impacted by low returning numbers of King Salmon, all resource users must except the responsibility and be equally restricted. Fair is Fair is Right!

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#178--- Increase the number of days only non-motorized vessels may fish on the lower Kenai River, as follows: An extra day of fishing from an non-motorized boat from January 1 to December 31. An example is Monday and Thursdays will be non-motorized boats only fishing on the Kenai River.

#179--- Add Thursdays as a day only non-motorized vessels may fish on the Kenai River downstream of Cunningham Park.

#181--- Only non-motorized vessels may be used when fishing on the Kenai River, as follows:

Make Kenai River drift boat only.

This proposal has been revisited time and time again at the BOF. There is not a lot of support for it and there never has been. By adopting this proposal you would disenfranchise many older long time Alaskans who can no longer row a drift boat. This fishery belongs to all of the Residents of the State of Alaska, to be used accordingly. Not to be hogged by a fraction of the majority for their own benefit. There has been less drift boat use in recent years on the Kenai River so please take that into effect. There are also large sections of the Kenai River where Drift Boat only use is allowed.



I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#180--- Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15.

I SUPPORT THIS PROPOSAL

#182--- Prohibit all guiding from 6 p.m. to 6 a.m., as follows: Local residents and unguided non-guided anglers would then have a fair chance to access the sockeye salmon fishery before 6:00 a.m. or after 6:00 p.m.

#185---Modify language referencing fishing from guide boats on the Kenai River to include all guided fishing.

I feel that only guided fishing from a boat is a concern in relation to the general public needing access.

I DO NOT AGREE OR SUPPORT THESE PROPOSALS

#183--- Allow guided anglers to fish from a guide boat on the Kenai River on Mondays in August.

At that time of year there are still many tourists in Alaska and on the Kenai Peninsula. They bring much needed money to our cities and communities, why not let them fish on Mondays in August too?

I SUPPORT THIS PROPOSAL

#184--- Relax guiding restrictions when king salmon fishing is closed by emergency order.

I think that ADF&G can manage this fishery with this tool at their disposal.

I SUPPORT THIS PROPOSAL

#186--- Only barbless hooks allowed in the Kenai River upstream of the Lower Killey River.

I SUPPORT THIS PROPOSAL

#187--- Allow only barbless, unbaited, single-hook gear on the Kenai River from January 1 – August 1.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#188--- Allow only one single-hook or one single-hook lure.

I feel multiply hooks should be allowed for Silvers and Pinks in August.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#189--- Allow fishing from shore after harvesting a bag limit of Coho salmon.

#190--- Expand the waters open to fishing after harvesting a bag limit of Coho salmon in the lower Kenai River.

#191--- Kenai River Coho salmon bag limit from two fish to three.

#192--- Shorten the Kenai River Coho season by closing October 31.



Having read all four of these proposals I feel that I agree with them and that they would not place to great a harvest issue upon these fish.

I SUPPORT THESE PROPOSALS

#193--- Create an archery fishery for sockeye salmon in a section of the Russian River.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#194--- Create a size limit for lake trout in Hidden Lake, as follows: In Hidden Lake, the bag and possession limit for lake trout is one fish under 16 inches of length.

This is a vital ice fishery and to limit it to that is not in the interest of the people that routinely fish it during the colder months of the year.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#195--- Remove the commissioner's emergency order authority to extend the Kenai River personal use fishery hour.

#196--- Prohibit dip nets from being attached to a vessel, as follows: Dip nets operated from a boat may not in any way be physically attached to the boat. They must be operated by hand.

#197--- Prohibit dip netting from a vessel that is not anchored in the Kenai and Kasilof river personal use fisheries, as follows:

In the Kenai and Kasilof Rivers boats carrying personal use dip netters must be anchored.

#198--- Prohibit webbing in personal use dip nets that exceeds 2.5 inch stretched measure.

#199--- Prohibit dip netting on the Kasilof River from a vessel with a motor on board greater than 10 horsepower.

All five of these proposals are nonsensical and are presented by Comm Fish interests. This is a RESIDENT Personal Use fisher to provide food for Alaskan tables in the winter. Leave it alone. It works just like it is.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#200--- Amend the number of king salmon that may be retained in the Upper Cook Inlet personal use fishery to 10 king salmon under 20 inches.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#201--- Amend the area open to dip netting from shore in the Kenai River personal use dip net fishery.

I SUPPORT THIS PROPOSAL

#202--- Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August.

#203--- Extend season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon.



#204--- Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park.

I support Alaska Residents utilizing this Personal Use fishery to the utmost.

I SUPPORT THESE PROPOSALS

#205--- Allow shore-based personal use dip netting in the Kenai River upstream to Skilak Lake.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

#206--- Create an area upstream of the Kenai River personal use fishery where recording and fin clip requirements are waived for fish that have not been off loaded.

I SUPPORT THIS PROPOSAL

#207--- Amend the boundary description language for the area open to dip netting in the Kasilof River personal use salmon fishery.

I SUPPORT THIS PROPOSAL

#208--- Allow 10 Dolly Varden/Arctic char per household in Cook Inlet Personal Use Fisheries.

I DO NOT AGREE OR SUPPORT THIS PROPOSAL

The following Proposals deal with issues that I do not have the knowledge and have not taken the time to research as to what I would support or not support. I simply do not live in those areas nor do I use any of those fisheries. I would like to say that I feel it is important that all user groups in the Northern Districts of Cook Inlet be provided for in an equitable way. I would like to see more Coho Salmon make it thru Cook Inlet to reach spawning grounds located in these watersheds. I would also like to see Sport Fishing and Personal Use Fishing access in all these areas increased for all Alaskan Sport Fishermen. I feel that limiting Sport Fishing access is always a step backwards except if a fishery is in dire need of protection. With that being said, the following proposals I have no input on because of lack of personal experience and use.

Proposals #209 thru #278

Thank You for your time and energy.



Andrew N. Couch
PO Box 155
Palmer, AK 99645

October 4, 2016

Boards Support Section
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Board of Fisheries Members:

This is my letter requesting that the Board consider Stock of Yield Concern designation for specific Northern Cook Inlet king salmon stocks that by Alaska Department of Fish and Game (ADF&G) emergency regulation have had no allowable in Unit sport harvest over the past 2 - 4 years.

This list would include all Unit 2, Unit 3, Unit 5, and Unit 6 of the Susitna River king salmon stocks.

It has come to my attention over the past week that the department may not be including discussion of any of these important and formerly heavily utilized king salmon stocks in its discussion of potential Upper Cook inlet stocks of concern to the Board of Fisheries on the basis that no new stocks have failed to attain or are expected to fail to attain escapement objectives for 5 consecutive years. Such a position would not include any discussion of stocks that should clearly qualify for Stocks of Yield Concern. A solid argument based on sport fishery harvests over the past 5 years could be made that ALL Northern Cook Inlet king salmon stocks should qualify as Stocks of Yield Concern. Even more alarming, and needing recognition, however, are stocks where no legal (in Unit) harvest of king salmon has been allowed over the past several years. Such designation could be made by individual stream stocks or on an all inclusive unit - wide basis.

Taking a brief look at yield within these fisheries, according to ADF&G Fishery Management Report No. 13-50 in 2011 Unit 2 king salmon harvest was 2,710 fish — approximately 66% less than the 2001 — 2010 average. In 2012 a preseason emergency order attempted to reduce sport king salmon harvest by 50% over the entire Susitna River drainage — but the season was further closed by emergency order on June 25. A comment in this report mentioned that the eastside harvest (Unit 2) during 2012 with these combined emergency regulations was AT LEAST A 95% Reduction.

Further upriver in Unit 5 (the Talkeetna River Drainage) the report states the harvest reduction was likely 75% in 2012.

Although the report does not mention specific percentages of reduction for Unit 3 Upstream of the Talkeetna river drainage and Unit 6 the Chulitna River drainage, an assumption could be made that since both of these fisheries are located further upriver with even later run timing the net result of harvest reductions was likely even greater during 2012 (remember that emergency order that closed the entire Susitna River drainage to king salmon harvest on June 25). From



2013 —2016, a period of 4 years all Susitna River drainage Units and streams where ADF&G closed king salmon harvest by preseason emergency order had a 100% reduction in legal sport harvest. Therefore, with 5 years of reduced harvest of 75% or more during one year (2012) and 100% on the remaining 4 years (2013 — 2016) this should easily fit the criteria —at least for discussion — as potential Stocks of Yield Concern. If that is not enough, consider that the Department is not planning to allow any legal sport harvest within Unit 2, Unit 3, Unit 5, and Unit 6 in 2017.

Thank You for your careful consideration of the Stock Status of Susitna River king salmon,

Andrew N. Couch
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p.s. individual king salmon stocks to consider for inclusion would include: Little Willow Creek,, Montana Creek, Clear Creek, Prairie Creek, East Fork Chulitna River — all streams with goals. Streams without goals but with similar king salmon harvest reductions would include Kashwitna River, Rabideux Creek, Trapper Creek, Indian River, Portage Creek.

