

COOK INLET BOF PROPOSALS
— COMMENTS —

RC46

TED CROOKSTON

KENAI

FEB. 8, 2020

COMMERCIAL SETNET DECADES OF EXPERIENCE WATCHING THIS RESOURCE

We OPPOSE proposal 78: Amend the Upper Cook Inlet Salmon Management Plan to include weighted criteria for the allocation of fishery resources.

--THE HARVESTABLE SURPLUS OF SALMON NEED TO BE PRIMARILY HARVESTED IN THE OCEAN MARINE ENVIRONMENT BEFORE ENTERING THE SPAWNING SYSTEM.

MAKING THE RIVER SPAWNING GROUNDS BECOME THE PRIMARY FOCUS OF HARVEST EFFORTS FOR SPORT AND PERSONAL USE WILL RUIN THE PRODUCTION AND HABITAT OF THE KENAI RIVER FOR ALL USERS.

YOU CANNOT HARVEST A SALMON RUN ONCE IT ENTERS THE RIVER. THIS IS FUNDAMENTALLY OBVIOUS.

The proposal takes away the Board of Fish members' discretion and independence. Current regulation recognizes a list of factors that a board member "may" take into consideration. This phrasing allows latitude for board members to consider which elements are appropriate to which circumstances. Proposal 78 seeks to take that latitude away and to dictate the factors that the board member "shall" use to decide while mandating the weight that each element must be given, instead of considering each proposal based upon all evidence and circumstance. If the board passes this proposal, it will be abdicating its authority now, and for all future BOF members, to ethically conduct the responsibilities of the board of fish.

- We support the board's current allocation criteria and the board's ability to equally balance all of these criteria when making an allocative decision. When the Alaska Board of Fisheries was established at statehood by the legislature, the founding language gave the board the flexibility to consider the most appropriate criteria for each proposal under consideration. The intent of KRSA's arbitrary ranking of the allocation criteria, which favor personal use, and sportfishing groups, is to regulate our setnet community out of business.

SUBMITTERS ON BEHALF OF 32
MEMBERS OF OUR OPERATION OF
PERMIT HOLDERS AND SUPPORT CREW.

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We OPPOSE proposal 88: Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to increase in-river goal ranges.

- The current in-river goal ranges already allow for expansion and increased harvest for the in-river sockeye sport fishery above the counter.
- The current in-river goals provide more fish to the in-river sport fishery above the sonar than can currently be harvested. The in-river sport fishery, even when liberalized, does not exploit the fish they are already allocated. This results in exceeding in-river goals, exceeding escapement goals, and foregone harvest.

PROPOSAL

104: <http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/proposals/104.pdf>

We OPPOSE proposal 104: Adopt an optimal escapement goal and amend the paired restrictions in the *Kenai River Late-Run King Salmon Management Plan*.

- We oppose this arbitrary and premature change to the scientifically established SEG. The big king goal was an attempt to revive the struggling king runs, and setnet fishermen have shouldered the majority of the conservation burden since it was established. ADF&G set the goal just three years ago at the 2017 meeting, so recently that not even one king salmon lifecycle has been completed. The efficacy of the new goal has yet to be established, and changing it now is premature. The result will be further unnecessary restrictions to the commercial setnet fishery.

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OF OUR OPERATION OF PERMIT HOLDERS
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