March 11, 2022

Dear Board of Fish,

I grew up on the Peninsula and fished the Kenai River as a child. I currently run my Guide business "Kenai River Recon" on the Kenai and Kasilof rivers. The Kenai River obviously is very important to me. If this proposal passes more King Salmon will be needlessly taken in order to satisfy the needs of a select group of commercial folks. We haven't made the SEG for the past few years so how will this proposal help to restore our King Salmon run? It won't, so we should not be putting nets out when we haven't even met the OEG. This type of management plan will eventually bring our Kings to near extinction!! We should not abandon our management plan that is currently in place, this is a step backwards in the wrong direction and will only hurt our King Salmon run further! I want to be able to fish for Kings again when the runs are strong enough just like when I was a child down here on the peninsula.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal.

Sean Smart

Sterling
99669

March 07, 2022

Dear Board of Fish,

I have been fishing the Kenai since 1987. I guided on the river from 2005 - 2007. I fish the river almost every year and have watched a steady decline on these magnificent creatures. I love fishing for Kings, but have completely given that up on the Kenai. There is no reason other than human greed that these fish have suffered such devastating. I completely oppose anything that can further their demise.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

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Shane Redmond

Yuba City
95993

Submitted By
Shane T
Submitted On
2/17/2021 12:27:59 PM
Affiliation
Idk

Proposition:172
I am supporting propostion 172, shrimp harvest should be changed from October to May. First, this plan is already working in Canada. Secondly, the saying that the shrimp is better before laying eggs may be true, but if they cant lay their eggs then there will be no shrimp. Third, we can make more money as a society if we sell them to tourists. Last, most tourists and other Americans don't like the eggs. In conclusion, the shrimp season should be changed from October to May if we are considering our future.

March 01, 2022

Dear Board of Fish,

I urge you to Vote NO on PROPOSAL 283. I live in Soldotna with my husband and three children. I am a lifelong Alaskan and moved to the Peninsula to be closer to the Kenai River. The sustainability of our fisheries is very important to me and I have witnessed first hand the decline of the Kenai River king salmon. We should be taking extreme measures to rebuild this unique stock of fish before its too late. Instead, some members of the Board want to LOWER the goal to harvest sockeye. Nevermind the fact that you're going stomp out the Kenai kings in the process.

This proposal is a step in the WRONG direction. It's only been two years since historic protections were put in place to SAVE THE KINGS.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

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Shannon Martin

Soldotna
99669

February 16, 2022

Dear Board of Fish,

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The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

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Shaun Churilla

Eagle River
99577

March 06, 2022

Dear Board of Fish,

Like logging, commercial fishing's days are numbered. Salmon runs on the Kenai have been mismanaged for years to favor commercial fishing. Time to put the fish first so there are some left for future generations.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

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Shawn Murray

Olympia
98506

March 07, 2022

Dear Board of Fish,

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Sheila Hart

Laurel
59044

February 15, 2022

Dear Board of Fish,

We are writing to urge you to vote NO on Proposal 283. Ever since we moved here 17 years ago, the king population has significantly decreased and it seems that the Board just keeps voting year after year for proposals that will eventually totally destroy the king population in the Cook Inlet and Kenai River area altogether just so outside interests can make money and attract tourists who don't give a shit whether the fishery destroyed or not. In other words, you are more interested in money than you are about saving the king fishery. We stopped fishing for kings on the Kenai over 10 years ago when the population started to decrease. We're doing our part, so please do the right thing for a change and Vote No on 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Sheryl Miller

Soldotna
99669

Submitted By
Sofron Reutov
Submitted On
3/10/2022 12:22:13 PM
Affiliation

Phone
9073991350
Email
Safreutov@hotmail.com
Address
Po box 563
Homer, Alaska 99603

Hello Mr.Chairman and all the board members, I Sofron Reutov own Kodiak Tanner permit and due to January 15 opening date. This year 2022 was my first year I tried to go fishing for Tanner in Kodiak, I couldn't drop my boat due to very thick ice pack around the boat yard launching dock. I tried once and couldn't break tru the ice , pulled my boat back out , Next day I hired an ice breaker, that ice breaker took 2 1/2 hours to break to the launching dock.That cost me over $1,800.00. Finally made it out but was late 2 days for the opener and we all know Kodiak opener.It was next to impossible to get out of Homer . It would really help Homer fleet out, if the opening date would move to February 1rst ,then the ice pack becomes a lot less challenging. Please consider changing the date to February 1st. Thank you Mr.Chariman and all board members

February 25, 2022

Dear Board of Fish,

I am a sport fisherman mainly on the Kenai river I have not harvested a King salmon in over 10 years because of the low abundance

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Spencer Archibald

Soldotna
99669

Sent from my iPad. Madam Chair Marit Carlson-Van Dort
My Name is ,STANLEY MACK I`m a commercial fisherman in area M. I have fished all my like in this area. I would like to take this opportunity to express my concern regarding proposal 282. I. Am STRONGLY opposed to this proposal. And the board allowing to take the proposal out of sequence..This proposal will do nothing that will increase the return of the fishery in CHIGNIK. But have a major impact on the communities in this area..

I would like to introduce (4) important web sites that state very clear what the problem is..
1.BLACK LAKE ECOSYSTEM RESTORATION TECHNICAL REPORT.
2>NOAA FISHERIES__march 05 2018 report—nearshore habitat for young salmon and other wildlife is slowly disappearing in CHIGNIK ALASKA
3-VOLCANOES AND EELGRASS TRANSFORM SALMON HABITAT
4-NATURAL HAZARDS,FISH HABITAT andFISHING COMMUNITIES IN ALASKA..
Madam Chair <each on of these web sites give the folks ,including the aqua culture non profit.group,a warning that the BLACK LAKE has a very serious problem.,and if this problem is not fixed ,one day ,i`m afraid that ,it might be to late...In doing my research I for out there are programs available to help fix this problem..
1 HABITAT RESTORATION
2 PACIFIC COASTAL SALMON RECOVERY FUND...
There is a lot more sites available..
I will be talking more about this issue at the meeting..also I would like to take this time to let you know that there is also a site on ALASKA CURRENT,this site showed us the current along the AK. Peninsula..I will explained the direction of the current and the natural habit of the salmon.
Also I read the WASSIP study and I found nothing that said the total run for CHIGNIK AND THE BLACK LAKE pass through this area.. just some first hand info,MY experience,The salmon that are being caught at DOLGOI all heading west.I know this,Because I drift gillnetter and have followed these fish from DOLGOI to UNAMAK..ALL MIXED STOCK.And the last few years the pinks have been taking over..
Madam Chair ..Thank you .....Stanley Mack..

February 16, 2022

Dear Board of Fish,

Please protect the King Salmon

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Stephen Duprey
Fairbanks
99709

February 20, 2022

Dear Board of Fish,

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

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Stephen Helms

Anchorage
99519

March 10, 2022

Dear Board of Fish,

I MOVED TO ALASKA IN 1981 AND I HAVE FISHED THE KENAI EVERY SUMMER SINCE.
i HAVE NEVER CAUGHT A KING SALMON OVER 50 POUNDS BUT I STILL LOVE THE BIG FISH.
I HAVE KEPT KINGS IN THE 25-40 POUND RANGE AND I HAVE HELPED FRIENDS NET BIGGER FISH. GOOD TIMES!

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened. The Kings have been overfished and I have to wonder if I will ever see another King above 50 pounds.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles. It may be the beginning of the end for King salmon and the end of international tourists who come to the Kenai for a big fish. Catch and release is not the answer either. If a big King is fought for a while to give the fisherman that special experience, there is a good chance the fish will die before it can spawn.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

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STEPHEN Kehl

Kenai
99611

February 16, 2022

Dear Board of Fish,

I have lived in Alaska for 40 years. I have worked on salmon seiners, long liners and in fish processing. I have seen fisheries become shadows of their former abundance including Dungeness crab, pot shrimp, king crab and halibut (a federal travesty). King salmon are on the ropes and your duty is to the people of Alaska and the resource. It is not to assure that the last king is shrink wrapped. Manage for the scarcity. King stocks have fallen drastically under your management. Fix it.

This proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Stephen R Poggi

Eagle River
99577

March 01, 2022

Dear Board of Fish,

My name is Sterling Lyman owner and operator of Absolute Alaska Adventures. We guide on the Kasilof River and book over 100 trips a year on the Kenai. Please do not lower escapement goals and focus on the future of our rivers and our fishing livelihoods. It is time that the future of fishing, the residents of Alaska a long with sport fishermen take a front seat to commercial fishing profits!

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

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Sterling Lyman

SOLDOTNA
99669

February 16, 2022

Dear Board of Fish,

36 year Alaska resident that enjoys the thrill of having a nice Chinook on the line. Equally as enjoyable and most satisfying is consuming that fish. Chances for a successful harvest have declined dramatically since the 80's.; both in the MATSU and on the Kenai. Please ensure this opportunity can be sustained, and enhanced, for the current and future generation of anglers. Please vote no on Proposal 283. Thank you in advance.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

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Steve Gordon
Palmer
99645

February 15, 2022

Dear Board of Fish,

Ive lived in Anchorage since 1978.
I love to participate in dip netting on the Kenai river.
I strongly oppose any changes that put Less Fish in the Kenai.
The residents of the State should benefit from our resources, not a Seattle based fleet.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

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Steve Harris

Anchorage
99516

Dear Members of the Board,

Attached please find a technical analysis that estimates optimum harvest rates, optimum escapement, and harvest policy considerations for Black Lake and Chignik Lake sockeye salmon stocks (Proposal 282). These results were based on sockeye salmon escapement and total return data for Chignik region collected between 1922 and 2021. In short, the data suggest that current escapement goals are conservative with respect to escapement levels associated with maximum sustainable yield. Data from recent decades for both of these stocks are less informative about optimum escapement; however, the data are informative about about the optimum harvest rate. Therefore, implementing a fixed harvest-rate policy would be of higher utility in comparison to a fixed escapement policy. Run-size forecasts and monitoring of in-season exploitation rates are necessary to successfully implement a harvest-rate policy.

Thank you for your consideration,

Steve

Steve Martell

Estimates of Optimal Escapement and Harvest Rates for Chignik Sockeye Salmon Stocks (Proposal 282)

Steve Martell PhD., Sea State Inc., Bainbridge Island WA, 98110

3/8/2022

Contents

1 Executive Summary

Estimates of optimal escapement rates and optimal harvest rates for Chignik and Black Lake sockeye salmon stocks were obtained by fitting stock-recruitment models to brood table data for these two stocks. Models were fit to two different data sets representing a long time-series and a short time-series. The short time-series data set contains additional changes to correct for improvements in stock identification and methods for allocation catch to early and late runs.

For Black Lake (Early Run), maximum likelihood estimates (MLE) of S_{MSY} range from 356,000 to 521,000 based on the long and short time-series data sets, respectively. For Chignik Lake, the MLE estimates for S_{MSY} range from 296,000 to 356,000 based on the short and long time-series data sets, respectively. The 95% credible interval for S_{MSY} for Black Lake ranges from 327,000 to 625,000 based on the long time-series. For Chignik Lake the 95% credible interval is 248,000 to 498,000.

The probability that an escapement target of 450,000 for Black Lake is less than S_{MSY} is conservative based on all of the available data ($p(450,000 < S_{MSY}) = 0.64$). The median value (risk neutral) for an escapement target that corresponds to S_{MSY} is approximately 420,000.

The probability than an escapement target of 400,000 for Chignik Lake is less than S_{MSY} is also very conservative $p(400,000 < S_{MSY}) = 0.83$) based on all available data. The median value (risk neutral) value for an escapement target that corresponds to S_{MSY} is approximately 321,000.

As a result of long-term fixed escapement policies, data from recent decades provide little contrast to precisely estimate optimal escapement S_{MSY}. However, precision in the estimates of optimal exploitation rate (U_{MSY}) are well informed by the variation in the observed total annual returns (R) versus the relatively constant annual escapement (S).

During periods of low marine survival rates that result in poor adult returns, a fixed harvest-rate policy would allow for fisheries to continue under certain conditions that limit fishing mortality. Fixed harvest-rate policies would require run-size predictions and in-season monitoring of exploitation rates.

2 Introduction

Escapement objectives for the Chignik river sockeye salmon are based on a range, where the current escapement goals are set at 350,000 to 450,000 thousand for Black Lake, and 220,000 to 400,000 thousand for Chignik Lake.

Estimates of optimum escapement and optimal exploitation rates for semelparous salmonid species can be obtained from fitting stock-recruitment models to escapement and total run size data. The simplest form involves fitting a linear model to the logarithm of returns per spawner versus spawners. The intercept of this regression defines maximum recruits per spawner, or the slope at the origin of the stock-recruitment curve. The slope of the regression line defines how survival rate changes with changes in escapement levels. Estimates of maximum sustainable yield reference points are obtained by solving the system of equations for $\partial R/\partial S - C = 0$; in other words, where average catch is equal to average surplus production.

The simplest model that has been widely applied to sockeye salmon stocks in North America is the Ricker model $R/S = \alpha - \beta S$. Schunte and Krondlund (1996, Can J. Fish. Aquat. Sci 53:1281-1293) noted that there is no analytic solution for the MSY-based reference points when solving this equation. However, the reverse transformation of solving α and β from estimates of S_{MSY} and U_{MSY} do exist. This same management-oriented approach was used to obtain estimate of reference points and the associated uncertainty.

The overarching objective is to determine the probability of a given escapement target exceeding the optimum escapement that would produce the maximum sustainable yield. In this paper, a probability distribution for S_{MSY} was constructed by fitting a stock-recruitment model to the observed total return and escapement data using a Bayesian approach.

3 Analytical Methods

This section describes the data and methods used to address the overarching question – what is the probability of specific escapement targets exceeding the level that would produce the maximum sustainable yield?

3.1 Data

Escapement data (S) and total annual returns (R) by brood year for early and late run Chignik sockeye salmon were obtained from Alaska Department of Fish and Game. There are two separate data sets: a short time-series spanning 1983 to 2013 and a long series dating back to 1922 to 2013 (Figure 1).

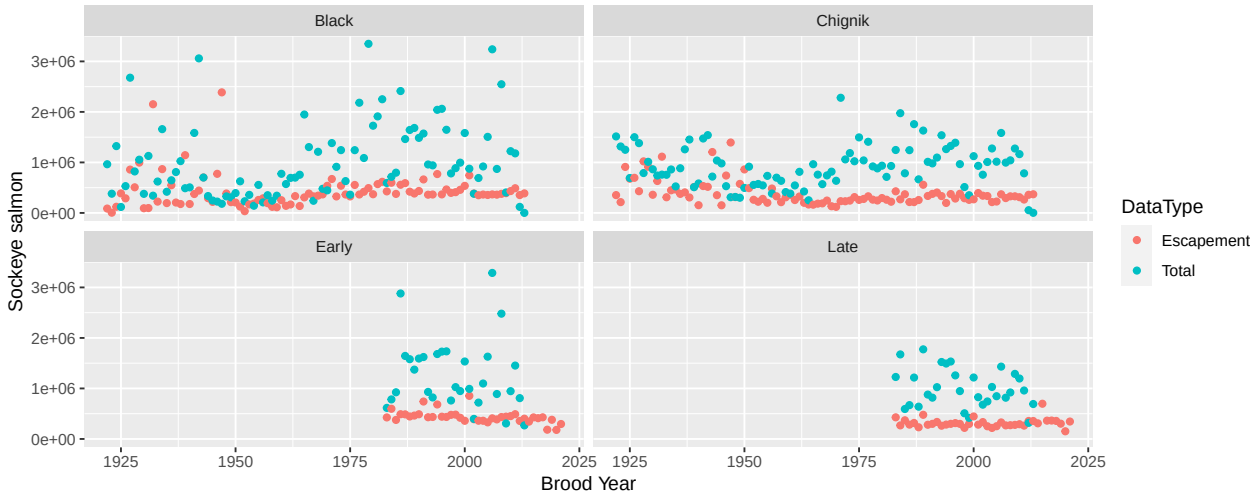


Figure 1: Time-series data sets for Total Run and Escapement for Chignik sockeye salmon stocks (Early Run = Black Lake and Late Run = Chignik Lake). The top row are the full data set from 1922 to 2013, the bottom row are the short time-series from 1983 to 2013 for Total Run and 1983 to 2021 for the Escapement.

3.2 Stock Recruitment Models

The Ricker stock recruitment model can be transformed into a linear model, where a linear regression model was then fitted to the Escapement (S) data (independent variable) versus the logarithm of the total returns per spawner ($ln(R/S)$) for each of the four aforementioned data sets.

$$ln(R/S)_i = \alpha - \beta S_i + w_i.$$

The relationship between the regression parameters α and β and the policy parameters U_{MSY} and S_{MSY} is given by

$$\alpha = U_{MSY} - \ln(1 - U_{MSY}), \quad \beta = U_{MSY}/S_{MSY}.$$

It is of note that there is no analytical solution for U_{MSY} in aforemention definition of α, and that efficient numerical methods exist to solve the equation for U_{MSY}. Point estimates of α and β obtained from the linear regression fits represent the maximum likelihood estimates for the Ricker model. Maximum likelihood estimates of U_{MSY} and S_{MSY} from the regression fits to the short time-series data are shown in Figure 2 and the long-time series data in Figure 3.

3.3 Bayesian Estimates

Uncertainty in the policy parameters was estimated using a Bayesian approach. The joint posterior distribution ($p(\theta|S,R)$) for the model parameters given the data is estimated by numerical integration using MCMC methods implemented using Jags in R.

$$p(\theta|S,R) \propto l(S,R|\theta)p(\theta) \propto l(S,R|S_{MSY},U_{MSY},\tau^2)p(S_{MSY})p(U_{MSY})p(\tau^2)$$

The marginal posterior distributions for the policy parameters S_{MSY} and U_{MSY} were estimated using the same linear regression model to predict the $ln(R/S)$, where the residual error terms are assumed normal with and estimated precision term τ^2. A non-informative beta prior distribution was assumed for U_{MSY}, and a weak log-normal prior for S_{MSY} with a log mean of 6.5 and a variance of 9.0. Further, bounds ranging from 0 to 3 million spawners for S_{MSY} were assumed for all data sets. A non-informative gamma prior was assumed for the precision parameter (τ).

4 Results

4.1 Maximum Likelihood Estimates

Maximum likelihood estimates of S_{MSY} and U_{MSY} from Ricker model fit to the short time-series data are shown in Figure 2.

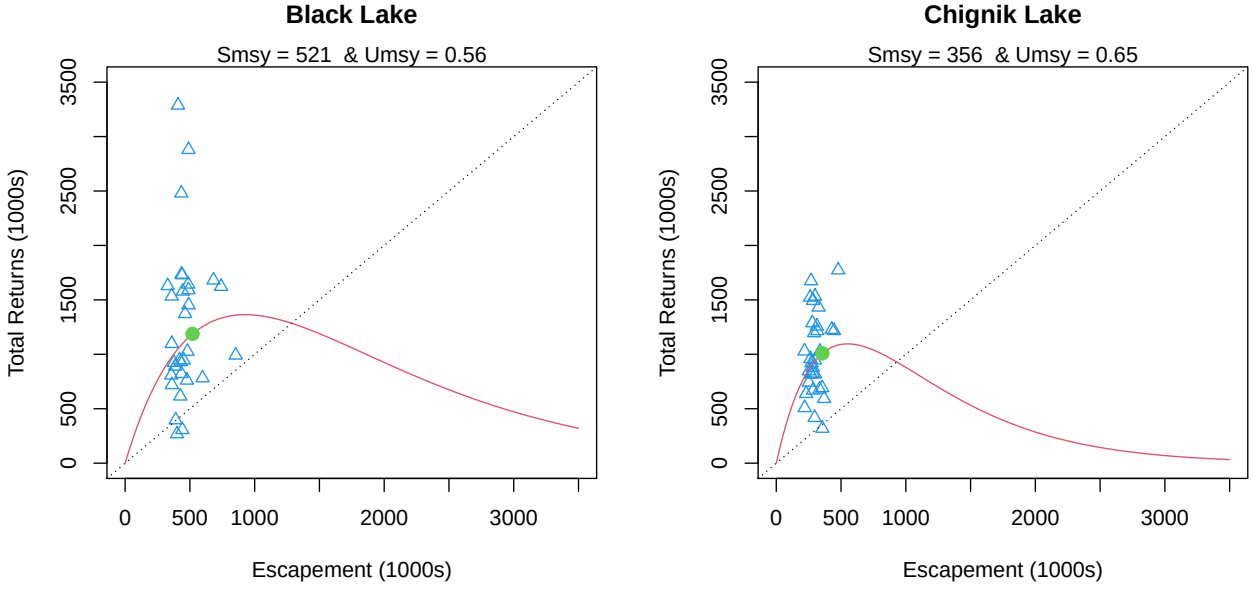


Figure 2: Ricker model fits to the short time-series stock-recruitment data for Black and Chignik Lake sockeye salmon. Data span 1983 to 2013 and the large green circle corresponds to the MSY estimates for escapement and total returns. Policy values for each model fit is noted in the figure subtitle.

Maximum likelihood estimates of S_{MSY} and U_{MSY} from Ricker model fit to the long time-series data are shown in Figure 3.

Restricting the data between 1922 and 1982 results in increasing the reference point estimates from 356,000 to 521,000 for S_{MSY} in Black Lake. A similar increase also occurs in Chignik Lake, where estimates of S_{MSY} increase from 296,000 thousand to 356,000 thousand. The origin of the stock recruitment relationship, which informs U_{MSY} is relatively unchanged when restricting the model fit to the short time-series. Black Lake

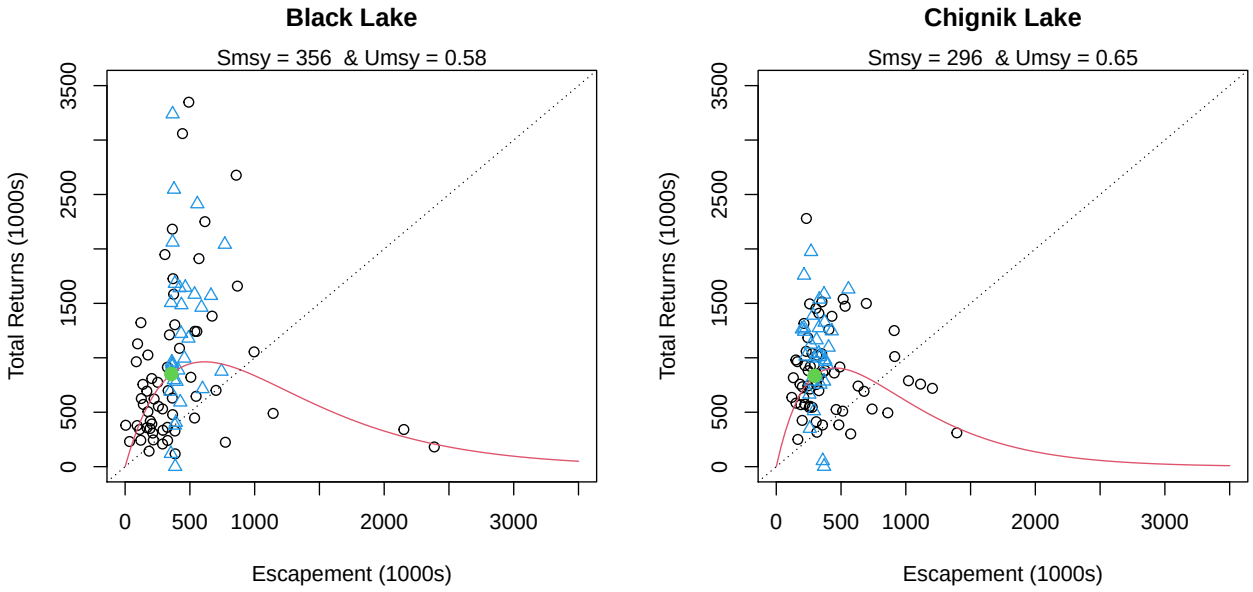


Figure 3: Ricker model fits to the long time-series stock-recruitment data for Black and Chignik Lake sockeye salmon. Data span 1922 to 2013, where the blue triangles correspond to data from 1983 and later.

estimates of U_{MSY} are approximately 0.58 per year and the optimal harvest rate (U_{MSY}) for Chignik Lake is approximately 0.65.

Data prior to 1983 are informative about the maximum stock productivity; as a large number of escapement values were below the estimated S_{MSY} for both early and late run stocks. One of the results of managing a stock using fixed escapement is that the annual escapement values tend to concentrate around the target. This is observed in 3 when you compare the early data (open circles) with the contemporary data (triangles). Moreover, the longer time-series data is also more informative about density dependent effects at high spawner abundance than the short time-series. Again, a fixed escapement harvest policy would harvest the surplus above MSY, resulting reduced contrast in spawner abundance data in which to estimate S_{MSY} with higher precision.

4.2 Bayesian Model Output

4.2.1 Optimum Escapement

The results shown in Figure 4 were constructed using the marginal posterior samples for S_{MSY} from the Bayesian model. These cumulative probability density functions represent the probability of an Escapement target (S) exceeding S_{MSY} based on the Ricker stock-recruitment model.

The probability of the escapement target of 350,000 to 450,000 for Black Lake is less than S_{MSY} is $p(220,000 < S_{MSY}) = 0.01$ to $p(450,000 < S_{MSY}) = 0.11$ based on the short time-series (Figure 4). For the long time-series data set, these probabilities change to $p(220,000 < S_{MSY}) = 0.13$ to $p(450,000 < S_{MSY}) = 0.64$(Figure 4). For Chignik Lake, the escapement targets range between 220,000 and 350,000 spawners. The probability that these escapement targets are less than S_{MSY} is $p(220,000 < S_{MSY}) = 0$ and $p(400,000 < S_{MSY}) = 0.08045$. Based on the long time-series, the probabilities are $p(220,000 < S_{MSY}) = 0.0043$ and $p(400,000 < S_{MSY})$= 0.83. Note that a value of 0.83 is equivalent to 83 chances out of 100, or 83%.

Using the results of Figure 4 the 5th and 95th credible interval for estimates S_{MSY}, along with the medial values, are summarized in Table 1. Credible intervals for the optimal exploitation rate U_{MSY} are summarized in Table 2.

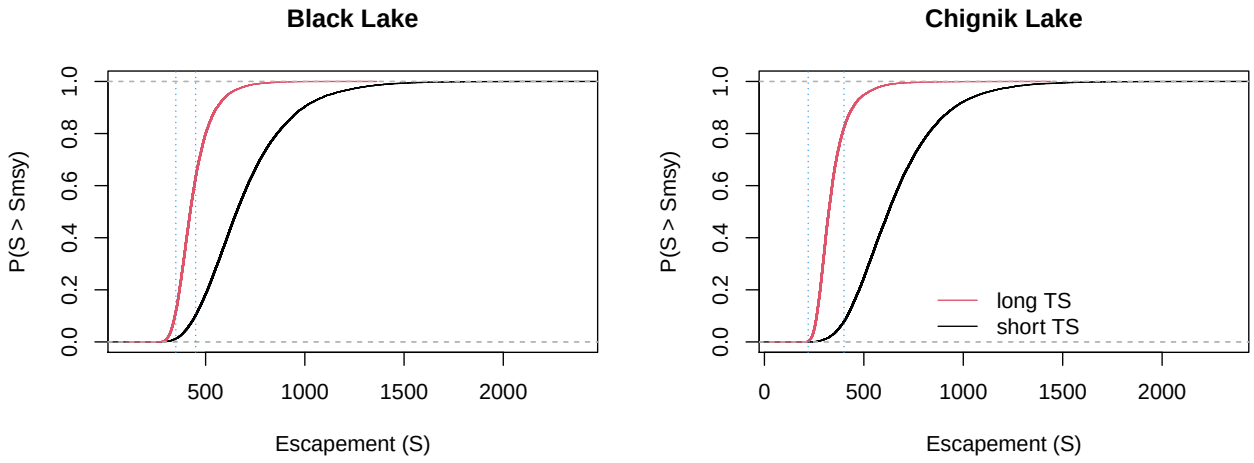


Figure 4: Empirical cumulative density distributions for the posterior samples for S_{MSY} based on the Ricker model. The red line is based on all data (1922 to 2013) and the black like is based on the short data set (1983 to 2013). The vertical dotted lines correspond to the current escapement goals.

Table 1: Estimates of S_{MSY} for Early (Black Lake) and Late run (Chignik Lake) 'sockeye salmon stocks based on a long time-series (1922-2013) and a short time-series (1983-2013).

	Early 1983:2013	Early 1922:2013	Late 1983:2013	Late 1922:2013
5%	404	326	370	248
50%	654	420	622	321
95%	1127	612	1083	502

Table 2: Estimates of U_{MSY} for early and late run Chignik sockeye salmon stocks based on a long time-series (1922-2013) and a short time-series (1983-2013).

	Early 1983:2013	Early 1922:2013	Late 1983:2013	Late 1922:2013
5%	0.42	0.44	0.51	0.47
50%	0.52	0.54	0.57	0.59
95%	0.64	0.63	0.65	0.69

Marginal posterior samples (e.g., trace plots) and probability density functions for model parameters are summarized in the Appendix.

5 Discussion

Based on the full time-series data, the upper range for escapement bounds for Chignik Lake sockeye salmon stocks are slightly conservative. Moreover, the lower range is well defined by the available data. The more contemporary data suffer from good management success, where inter-annual variation in annual escapements has been minimized at the expense of maximizing surplus harvest. Estimating the optimal escapement requires significant contrast in the independent variable which is in complete contradiction to fixed-escapement harvest policies. However, due to natural variation in marine survival rates, the total return and escapement data are informative about the optimal exploitation rate.

There are many assumptions in the underlying data, the least of which is that the regression estimates of the model parameters assume the underlying observations are independent. It is well known that stock-recruitment data violate this assumption and this usually leads to a bias in the management parameters. In the literature, this is known as time-series bias, and there have been many failed statistical attempts to correct for it. The direction of the bias is well known, and usually results in biased estimates of the slope at the origin (or U_{MSY}) based on simulation studies. Furthermore, most stock-recruitment data sets show a negative correlation between the estimated policy parameters (i.e.,U_{MSY} and S_{MSY} in this case).

An additional assumption that may bias policy parameters is the assumption of no error in the annual escapement estimates. In practice, there is observation error, as the escapement estimates are based on extrapolations from weir count data. In this assessment, and previous assessment of optimal escapements, all of the error structure is assumed to be model process error – in this casse variablitity in survival rates from egg to adult. A linear mixed effects model would be more suitable for exploring the impacts of observation errors on policy parameters.

Finally, estimates of optimum escapement should not be thought of as a conservation threshold target associated with the probability of extinction. There are many instances where both of these stocks have fallen below the combined threshold escapement limits, and yet the resulting returns per spawner can still be well above average. Specific conservation thresholds that are a function of the management parameters (e.g., 10% and 50% of S_{MSY}) should be established such that appropriate decision tables can be constructed to assess outcome of alternative managment actions. Under a fixed exploitation-rate harvest policy, these conservation limits would trigger a closure if the predicted returns fell below defined conservation thresholds.

5.1 Conclusion

Based on the observed data and assumptions herein, the results suggest that the current upper escapement range for Black Lake and Chignik Lake are conservative with the odds that they are above the optimum S_{MSY} value greater than 60/100 and 80/100, respectively.

5.2 Harvest Policy Considerations

There are two contrasting harvest policy options that the Board of Fish could consider: (1) a fixed escapement policy (i.e., status quo), or (2) adopt a fixed harvest-rate policy, where annual harvest takes a fixed proportion of the total returns. A fixed harvest-rate policy is less distruptive to the fishing comunity as it allows for limited opportunities during periods of low returns; however, this comes at the expense of trading off large yields during periods of higher than average returns.

The data and results of this modeling exercise have demonstrated that estimates of U_{MSY} are much more robust than estimates of S_{MSY}. However, implementing a fixed harvest-rate policy requires a prediction about how large the total returns will be prior to the start of the fishery. The optimal annaul catch each

year is then set equal to U_{MSY} times the predicted total returns. If such a prediction, or in-season run-size estimate, is not available, then other management measures that limit exposure such as closed areas, gear, or effort restrictions would have to be designed to limit exploitation rate to below U_{MSY}. The simplest of polcies would be, "If you dont want to catch more than 50% of the fish, then don't open more than 50% of the fishing grounds" (Carl Walters, 1999). Moreover, if the prediction over-estimates abundance, then its more likely that over-exploitation could occur without in-season monitoring of catch rates. This in-season monitoring is akin to in-season monitoring of escapement estimates. In years where the stock prediction is less than the realized, then there is no conservation risk associated with the prescibed fishery.

6 Appendix

6.1 Symbols and Definitions

Table 3: Definition of variables and symbols used in this document.

Variable	Symbol	Description
Return data	R	Total number of returns (catch + escapement)
Escapement data	S	Annual adult escapement to spawning grounds
Returns per Spawner	R/S	Total returns per spawner brood year
Intercept	α	Maximum returns per spawner at the origin of the S-R curve
Slope	β	Density dependent term for the Ricker S-R curve
Optimum escapement	S_{MSY}	Escapement associated with Maximum Sustainable Yield
Optimum exploitation rate	U_{MSY}	Harvest rate that will achieve Maximum Sustainable Yield
Estimated parameter vector	$\theta = \{U_{MSY}, S_{MSY}, \tau^2\}$	vector of unknown parameters to be estimated from the data

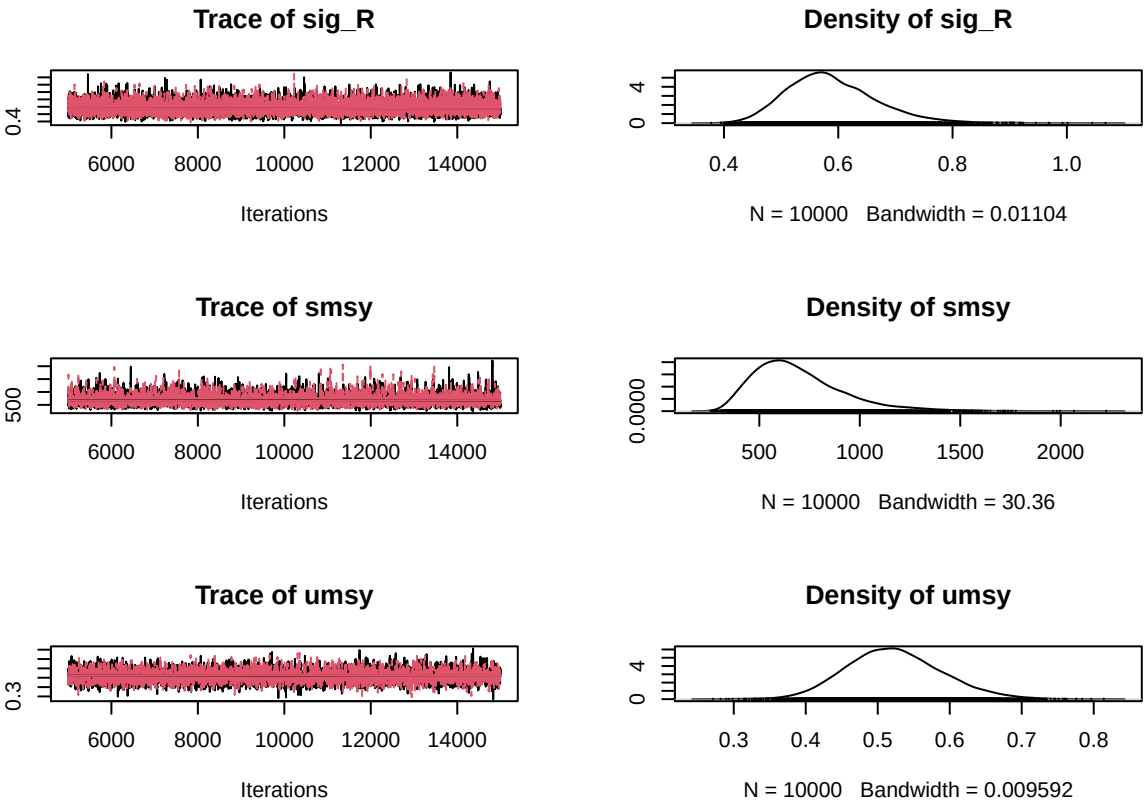
6.2 Escapement and Total Return Data

Table 4: Escapement and Return data for Black Lake (Early) and Chignik Lake (Late) sockeye salmon data used in this assessment.

Year	Early S	Early R	Late S	Late R	Both S	Both R
1983	426177.7	615358.8	428034.3	1227156.2	854212.0	1842515.0
1984	597712.8	782694.1	268495.0	1673664.4	866207.8	2456358.5
1985	376578.0	924150.1	369260.0	592771.8	745838.0	1516921.9
1986	489566.2	2879788.4	283752.8	669717.5	773319.0	3549505.9
1987	486989.8	1643481.4	316753.2	1215574.4	803743.0	2859055.9
1988	444906.8	1579015.2	230850.2	638753.3	675757.0	2217768.5
1989	462967.8	1372353.5	478207.2	1773875.0	941175.0	3146228.6
1990	489086.7	1591721.3	281323.3	878566.8	770410.0	2470288.1
1991	740783.1	1622395.0	299314.9	817948.2	1040098.0	2440343.2
1992	429736.1	931302.2	336866.9	1024861.1	766603.0	1956163.3
1993	434924.4	821734.6	262452.6	1523354.6	697377.0	2345089.2
1994	682447.3	1681172.4	284461.7	1492964.6	966909.0	3174137.0
1995	440857.1	1729043.3	299062.9	1532720.8	739920.0	3261764.1
1996	435298.2	1734007.2	313838.8	1258196.0	749137.0	2992203.2
1997	477220.2	761236.7	298397.8	947540.5	775618.0	1708777.2
1998	481516.0	1025966.9	219612.0	508225.5	701128.0	1534192.4
1999	419636.0	948636.6	296330.0	418219.3	715966.0	1366855.9
2000	359544.2	1533530.6	445692.8	1216688.4	805237.0	2750219.0

Year	Early S	Early R	Late S	Late R	Both S	Both R
2001	853473.2	991394.1	283444.8	826462.7	1136918.0	1817856.9
2002	390094.0	396808.3	334222.0	678699.2	724316.0	1075507.5
2003	361105.8	720022.0	250883.2	742696.3	611989.0	1462718.3
2004	360329.9	1097874.7	217930.1	1029374.7	578260.0	2127249.4
2005	328506.1	1629417.1	251950.9	846077.3	580457.0	2475494.4
2006	408232.9	3286885.1	327259.1	1432148.2	735492.0	4719033.3
2007	386728.3	889779.4	268244.7	816686.0	654973.0	1706465.5
2008	433841.0	2480092.8	272215.0	920422.0	706056.0	3400514.8
2009	441557.1	306971.2	278504.9	1288340.3	720062.0	1595311.5
2010	452191.3	946042.2	291721.7	1196759.0	743913.0	2142801.2
2011	489903.0	1452925.9	263913.0	959175.8	753816.0	2412101.7
2012	356512.6	808379.2	355878.4	318944.7	712391.0	1127323.9
2013	401051.6	268395.5	355050.4	691694.3	756102.0	960089.8
2014	342403.6	NA	309206.4	NA	651610.0	NA
2015	426817.0	NA	697082.0	NA	1123899.0	NA
2016	410921.9	NA	362253.1	NA	773175.0	NA
2017	428349.7	NA	364211.3	NA	792561.0	NA
2018	182991.5	NA	356706.5	NA	539698.0	NA
2019	379444.5	NA	302554.5	NA	681999.0	NA
2020	179200.4	NA	151777.2	NA	330977.6	NA
2021	296032.6	NA	344909.1	NA	640941.6	NA

Posterior samples for the early run short time-series.



Posterior samples for the late run short time-series..

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plot((t2$samples))
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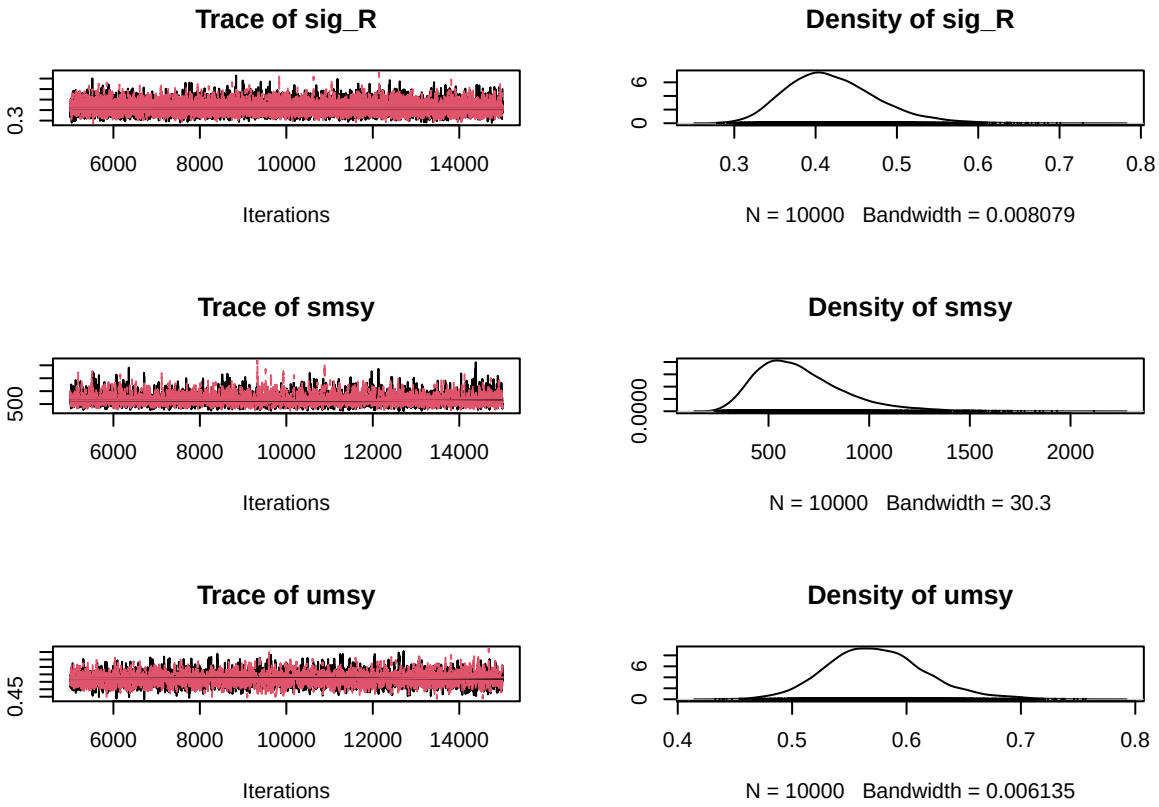
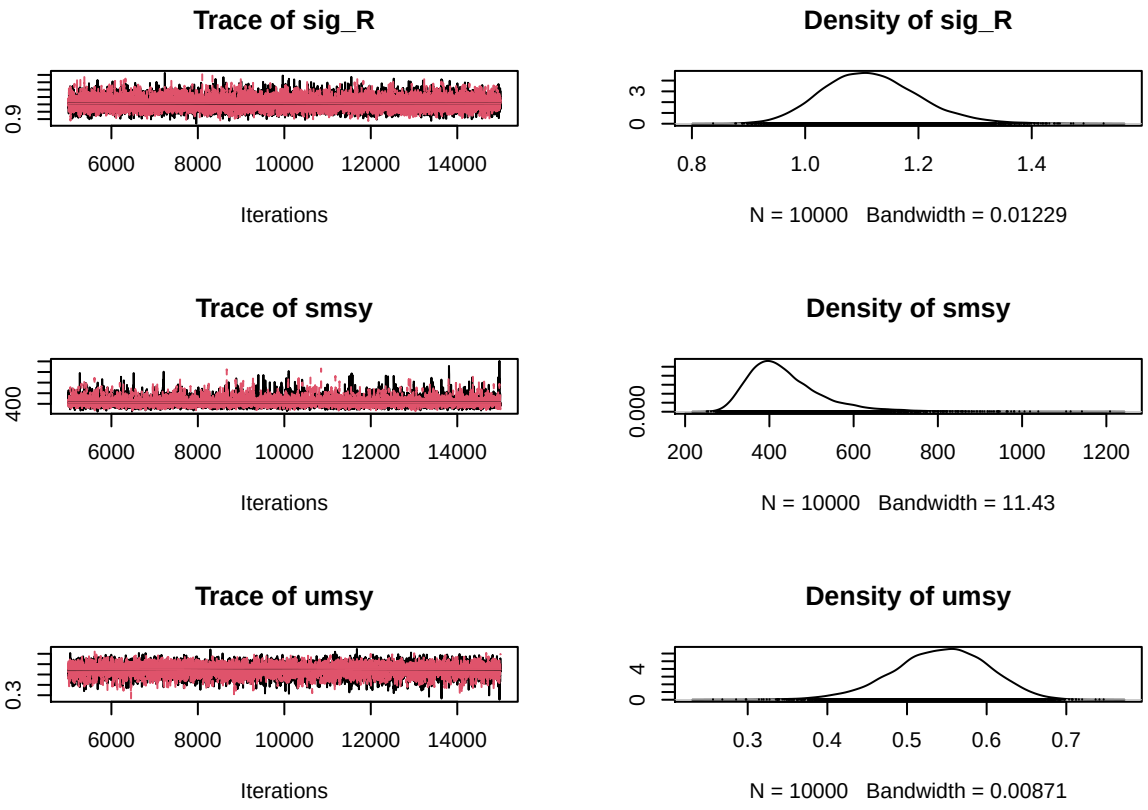


Posterior samples for the early run long time-series.

```
plot((t3$samples))
```



Posterior samples for the late run long time-series.

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plot((t4$samples))
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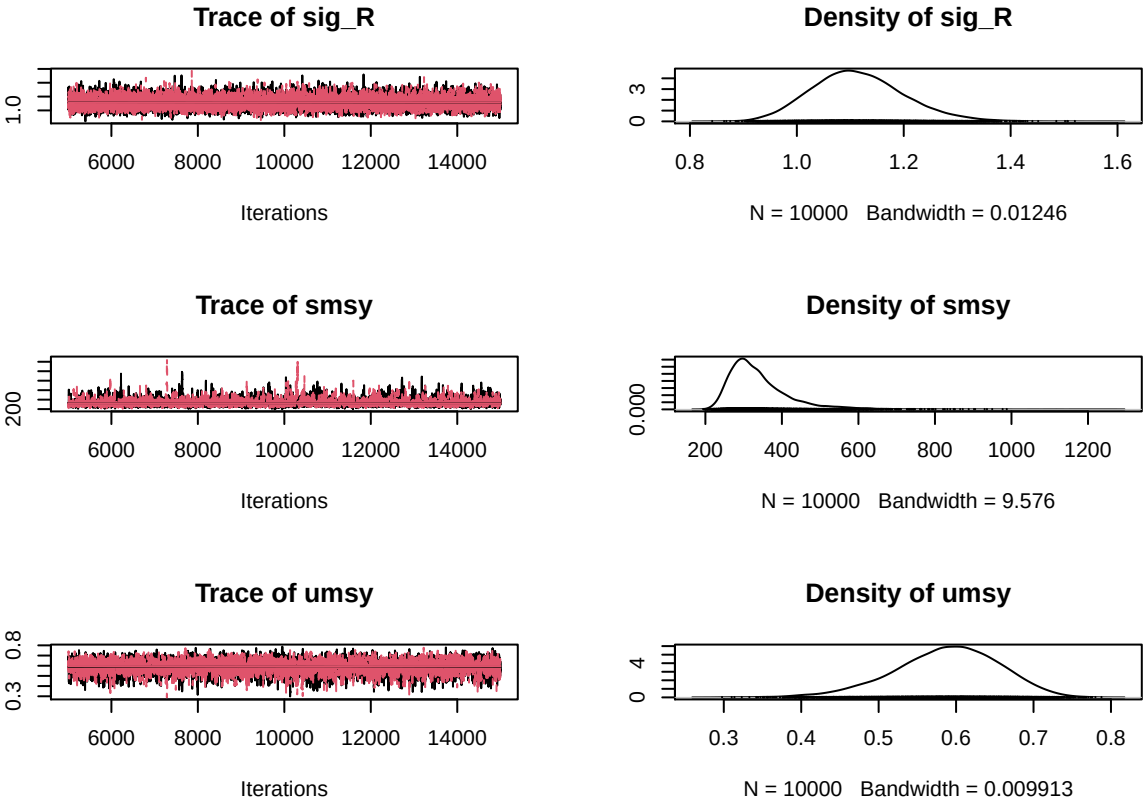

March 08, 2022

Dear Board of Fish,

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Steve O'Hara

Anchorage
99516

February 24, 2022

Dear Board of Fish,

I am a resident, lives here, works here, pays taxes and trade economically in Alaska. I employee 10 persons full time contributing to all of the communities. Allowing a group to commercialize our natural resource and use it for gain is not the value the board should be visualizing. the economic growth in communities relies on residences permanent in nature. Not a seasonal asset, seasonal help or taking from one of our treasured features. An Alaska resident has to survive a long winter and work hard for a short window to fish. Many times that window is the only opportunity to get some work done. Making it even more difficult to enjoy the summer in Alaska. If there is not enough fish then it should be across the board and equal to all. No group deserves a right to state they benefit a community more then the other. If there are no employees working year round then communities will suffer a greater consequence then the fishing community provides. The resource of Alaska needs to be used wisely to grow the community as a whole not one group who is profiting from the one treasured resource. Protect everyone, treat all the same. If I cant hire and keep employees then infrastructure will suffer with higher cost of employment and less available employees. We all like to fish, we all deserve the same chance as well as same limits. I don't sell my resource I use and enjoy it personally. As I should and deserve after a long winter.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Steve OHara

Anchorage
99507

February 19, 2022

Dear Board of Fish,

This is a bad idea. We shouldn't be attempting to exploit one species at significant risk of another threatened species fur monetary gain.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Steve Pearson
Anchorage
99503

March 07, 2022

Dear Board of Fish,

The messages checked below are plenty.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Steve Shields

Carrollton
75006

February 16, 2022

Dear Board of Fish,

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

STEVEN BLAHA

Willow
99688

February 15, 2022

Dear Board of Fish,

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Steven Brown
Soldotna
99659

February 18, 2022

Dear Board of Fish,

Having fished the Kenai for 25 years,I have seen the decline just in that time of the fishery on the Kenai,smaller and far fewer Kings,please vote no to save the kings,thankyou

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

stuart ennis

naches
98937

February 25, 2022

Dear Board of Fish,

I have lived on the Kenai Peninsula for 24 years. I have raised my children here; I will retire here. I'm both former Executive Director of the local tourism office as well as the former GM of a local seafood processor. I also enjoy sportfishing. It is clear to me that "the Kenai" without king salmon won't be the Kenai as we know it, and Proposal 283 further risks that outcome.

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that? Commercial fishing certainly plays a vital role in our local economy, but sportfishing is the industry that has a significantly bigger impact. So many of the other tourism-based businesses (whale watching, bear viewing, bars/restaurants, etc.) would drastically decline without folks coming here to fish. And sportfishing enthusiasts understand that harvesting king salmon, whether by fishing pole or set net, is not a wise choice.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal.

Stay the course and protect the kings.

Summer Lazenby

Soldotna
99669

February 17, 2022

Dear Board of Fish,

Live in PA.Visit and fish the Kenai River at least twice a year. Please vote No on proposition 283!

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

kirr susan

Canonsburg
15317

March 10, 2022

Dear Board of Fish,

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Susan P Nelson

Sterling
99672

February 18, 2022

Dear Board of Fish,

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Sydnee Allen
Riverdale
84405

March 08, 2022

Dear Board of Fish,

Do not allow this to pass

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tally Stone

Puyallup
98375

February 20, 2022

Dear Board of Fish,

I have fished my entire life. Conservation is the only way to preserve for generations.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Taylor Fitterer

Brainerd
56401

February 16, 2022

Dear Board of Fish,

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

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Taytum Helgesen

February 15, 2022

Dear Board of Fish,

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

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Ted Smith

Soldotna
99669

February 16, 2022

Dear Board of Fish,

I have been fishing the Kenai for 70 years and previously enjoyed fishing for kings. I stopped fishing for kings due to declining numbers. Most of the long -term fishers have likewise done so to have a unique resource. The Kenai's biggest problem is greed by one group of users regardless of the conservation impact.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

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Ted Wellman

Sterling
99672-9329

February 18, 2022

Dear Board of Fish,

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The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

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Terry Bateman

Fairbanks
99709

Submitted By
Theresa Peterson
Submitted On
3/11/2022 4:30:16 PM
Affiliation
Alaska Marine Conservation Council

March 11, 2022

Board of Fish Comments

Boards Support Section

P.O. Box 115526

Juneau, AK. 99811

PROPOSAL 264 – OPPOSE - Amend regulation requiring operation of Dungeness crab pot gear once within a 14-day period.

PROPOSAL 265 – OPPOSE - Repeal regulation requiring operation of Dungeness crab pot gear once within a 14-day period.

PROPOSAL 266 – **SUPPORT- 750 POT LIMIT portion of proposal** - Establish Kodiak District Dungeness crab pot limits.

PROPOSAL 268 – **SUPPORT-** Adopt a new Tanner crab harvest strategy used to set annual harvest limits in the Kodiak, Chignik, and South Peninsula districts.

PROPOSAL 270 – SUPPORT -Amend pot limits for Kodiak District Tanner crab.

Dear Chair Carlson-Van Dort and Members of the Board of Fish,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners, and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans. As a marine conservation group formed by commercial fishermen around the State in 1994, we appreciate the opportunity to provide input on conservation and community considerations on proposed management changes to the Dungeness and Tanner crab fisheries.

AMCC is **opposed to proposals 264 and 265** which seek to amend or repeal the 14-day requirement to haul Dungeness crab pots. Regular handling of gear is common practice in all commercial fisheries to minimize impacts on the target species, bycaught species, and habitat. In addition, regular handling of gear reduces impacts on fisheries and gear types prosecuting different fisheries in the same region. Regular handling of crab pots benefits the conservation of the crab stocks by reducing lost gear and reducing ghost fishing mortality. When crab pots are left untended for weeks at a time they are more vulnerable to loss due to storms, waves, entanglement, getting buried in the sediment and algae growth. Crab stuck in pots buried by sand will eventually die. In our discussions with long time Dungeness fishermen, fishermen have noted an increase in soft crab in recent years. Local observations have found that the soft crab do not harden up when stuck in a crab pot. Gear loss contributes to increased mortality of Dungeness, Tanner and king crab through ghost fishing and the impacts are increased when the fishery is concentrated in a small area. As noted in the ADF&G staff comments, from 2016 to 2020, 69% of the Kodiak District Dungeness crab was taken from three statistical areas, Trinity Islands, Alitak Bay and Ugak Bay and within those areas gear is further concentrated in preferred fishing grounds.

ADF&G staff comments for proposals 264 and 265 note: *Studies from SE Alaska, British Columbia, and Puget Sound estimate Dungeness crab ghostfishing mortality due to lost pots at 2–7% of the annual Dungeness crab harvest. Applying these estimates to the 10-year average harvest for the Kodiak District (295,000 crab) equates to an estimated annual ghost-fishing mortality of 5,900–20,650 Dungeness crab. A study in Women's Bay near the City of Kodiak published in 2014 additionally estimated 16–37% of smaller sized red king crab (60mm) present in the study area were killed annually due to ghost fishing during the study period (1991–2008).*

In sum, AMCC believes that consistent and regular hauling of baited Dungeness gear is better for health of the crab stocks and the current 14-day requirement is best for the overall conservation of the resource. It is important to note that it is currently legal to open the doors and remove bait when a vessel anticipates being away from their crab pots for more than 2 weeks. The gear can be left in the water but not actively fishing for extended periods of time.

Proposal 266 seeks to establish Dungeness pot limits and restrict concurrent fishing. After significant community discussion, AMCC supports limiting the fishery to 750 pots and maintaining the historical fishing patterns of vessels to participate in other commercial

fisheries. It is common practice in Kodiak to leave crab gear soaking while participating in a salmon opening or prosecuting a longline trip. The 750-pot limit is fairly high when compared to other regions but captures the 635-pot average for the fleet from 2012 to 2021 and represents a reasonable compromise from our perspective. It is difficult for most vessels, particularly those engaged in multiple fisheries to monitor and consistently haul more than 750 pots and the limit in intended to address issues with lost gear referenced above and congestion in inner bays expanded on below.

Under the current management structure for Dungeness crab there are no limits on the number of pots a vessel can deploy. In recent years, the Kodiak District has seen significant increase in effort and harvest as a result of strong harvests in 2019 and 2020 and good harvest and an exceptional price in 2021. There were 17,720 pots registered in 2021 in the Kodiak District by vessels that made landings. This figure is well above the 2012-2021 average of 7,170 registered pots and illustrates the magnitude of the issue.

The proposal seeks to address a significant problem with congestion of pots in bays which negatively impacts other fishermen. With an average of 61% of the Dungeness harvest occurring in June, July and August and an average of 68% of the harvest coming from three statistical areas as noted above, bays can become overwrought with crab pots and impact both the safety and prosecution of a fishery by others.

For example, in Moser Bay in 2020 and 2021, crab pots moved during storms and ended up tangled in setnets, leading to lost fishing time. The setnet tender increased run time to fish camps to avoid crab pots and when pots could not be avoided lost significant time untangling the pots. The seine fleet leaving Lazy Bay bound for grounds like Alitak beach has to navigate through hundreds of pots which are hard to see when the weather is rough, the worst time to get line in the wheel. The barge which delivers provisions to the Alitak processing plant and leaves with processed fish notified fishermen that it could not get through the pots and asked fishermen to move them or they would have no choice but run them over, resulting in lost pots.

Jig fishermen entering Ugak Bay and looking for a place to anchor up for the night have had difficulty finding a place to drop the anchor in between pots. The proposal reflects the changing nature of fishery with pots so thick it is difficult to navigate a boat through them.

While the pot limit will not address all the identified issues, it will help and is consistent with the management of all other Dungeness fisheries. In Southeast Alaska the Dungeness fishery is managed with limited entry permits and tiered pot limits. There are 49 permits with a 300- pot limit, 43 permits with a 225-pot limit, 83 permits with a 150-pot limit and 98 permits with a 75-pot limit. In Washington there are permits for 500-pot limits and 300-pot limits and in Oregon there are three tiers of 200, 300 or 500 pots. Pot limits coupled with regular gear hauling requirements will help mitigate impacts on the crab and other gear types fishing in the same area.

AMCC notes the challenges with enforcing the pot limits and supports issuance of buoy tags to aid in enforcement. While many restrictions are difficult to enforce, most fishermen operate their fishing business in full compliance with all regulations and will abide by the regulations regardless of enforcement challenges.

AMCC supports **PROPOSAL 268** to adopt a new Tanner crab harvest strategy to set annual harvest limits in the Kodiak, Chignik, and South Peninsula districts. We applaud the considerable time and resources area crab biologist dedicated to update the harvest strategy under the current environment.

The proposed Tanner crab management plan is more reflective of stock status and provides increased opportunity to target smaller harvest. The plan updates long-term abundance thresholds used to open the fishery and implements a ramped harvest control rule that incorporates both mature male and mature female abundance when determining maximum legal male exploitation rates. In terms of management, the plan eliminates the 400,000-pound district minimum GHL and eliminates the requirement that at least 2 sections be open for a fishery to occur which were established when the status of the stocks was significantly higher than we have seen in decades. The proposed harvest strategy is tailored to exploitation rates in the past which has resulted in a successful fishery over the last 20 years.

AMCC supports **PROPOSAL 270,** to amend pot limits for Kodiak District Tanner crab. The winter Tanner crab fishery is somewhat unique in that it was designed with input from the community-based fleet. Fishermen wanted managers to factor in safety, equity, and conservation into how the fishery operates. If the daily weather update for the fishing grounds includes a gale warning, managers delay the fishery for 24 hours. Doing so provides for greater safety and equity in the fishery.

The fishery was also designed with input by fishermen to have a minimal impact on Tanner crab stocks. Crab pots can only be hauled from 8:00 in the morning until 6:00 at night, thereby reducing the mortality of discarded crab—those that are undersize or female. Minimizing the number of times a pot is hauled in a 24 hour reduces stress on the crab when handled on deck and the daylight only requirement limits the exposure of discarded crab to colder temperatures in the night. Vessels are also limited to 20 pots depending on the total allowable catch of crab, which serves to both minimize the impact of the gear on the crab and level the playing field among vessel sizes.

The current structure of the fishery is working well and the fleet can easily catch the quota with 20 pots fishing daylight hours. The fleet has been conservatively managed and participating fishermen report catch daily to area managers who carefully monitor the fleet to allow for maximum harvest. The fishery is very important to community-based fishermen and nearly all vessels, captains and crew reside in Gulf of Alaska communities.

When the Tanner crab biomass improves and GHL's increase, so does fleet effort. From 2003 to 2021, between 31 and 80 vessels participated in the fishery. The number of participating vessels increases and decreases with the GHL and this trend will no doubt continue as the stock status improves.

In 2022, 87 vessels registered and with 179 limited entry permits available, one can anticipate increased effort in 2023 based on the success of the fleet in 2022 with record high prices and good CPUE.

The proposal will maintain the 20 pot limit up to 2,500,000 pounds and increase by 10 pots if harvest is between 2,500,000 to 5,000,000. There is strong interest among the Kodiak based fleet to maintain the small limit beyond 2,500,000 pounds. Discussion to date have expressed interest in maintaining the 20 pot limit regardless of the GHL or increasing to 25 or 30 pots if the GHL reaches 5,000,000.

With the understanding that vessels and pots will increase with increased GHL, why increase the number of pots vessel can use at the same time? If the GHL increases the fleet can still catch the quota with 20 pots. A simultaneous increase in vessels and gear will compress the season and increase crab mortality with increased handling.

It is important to maintain the integrity of the small boat fishery that fishermen and managers have worked hard to maintain. The Kodiak fleet is working to maintain a fishery for years ahead and have proven they can catch the crab with the current pot limit. Larger vessels do have the benefit of carrying larger, heavier pots which usually fish better than smaller pots used by smaller vessels. In short, the fishery is working well under the current limits and AMCC supports proposal 270 and encourages the Board of Fish to consider maintaining the 20 pot limit beyond 2,500,000.

Thank you for the opportunity to comment on the proposals under consideration by the Board of Fish.

Sincerely,

Theresa Peterson

Fisheries Policy Director

Alaska Marine Conservation Council

February 16, 2022

Dear Board of Fish,

I don't not support prop 283, please keep native and subsistence based people on mind. We live off these fish. If they die my family does too

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Thomas James

Klawock
99925

March 07, 2022

Dear Board of Fish,

The king runs have been very poor due to the amount of commercial netting. This needs to be reduced in order to save the king population.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Thomas Satterlee

Big lake
32654

February 19, 2022

Dear Board of Fish,

I first fished for Alaskan salmon as a Coastguardsman assigned to a remote Loran Station in the mid-'70s. That experience has had me returning regularly. When my children were old enough I began bringing them, along with other family members to the Kenai - using guides, charter-air services, vehicle rentals, restaurants, paying licensing fees, and utilizing local lodging on an almost annual basis - all contributing the the economy of Alaskan Kenai residents, and to the benefit of the State in general.. Even with the pandemic, the family missed only one year and six of us returned again last summer. All competent economic data shows that a single Kenai King, as with most species fished both for sport and commercial use, is far more valuable as a sportfish than simply being taken commercially - more so if the species is simply a by-catch. We have watched the "death-spiral" of breeding success over the years of this magnificent species - to the point that they are fundamentally unfishable today by responsible anglers! The host of special regulations, bait restrictions, catch and release orders and the like over the past decade make the risk to the species eminently clear. The fact that AF&G has similar stringent restrictions in place for the upcoming season simply highlights in what dire condition the Kenai River kings stock is in.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283, would effectively allow commercial harvesting of the signature kings when AF&G's data clearly clearly reflects that the lower escapement goals are not being realized. The argument that catch-and-release is a reasonable surrogate for closed fishing is a charade given the sound scientific data demonstrating that such fish have an abysmally low survival rate.

The Board's decision in 2020 to protect the Late Run Kenai River king salmon was well taken but needs to be given an adequate period to succeed. Proposal 283 is a wholesale abandonment of that effort, to the advantage of a small group and the detriment of the clear need to conserve a species that has value to a wider range of Alaskans and non-Alaskans alike. From an economic standpoint alone, the OEG should oppose Proposal 283, and asisst in laying a solid base from which to preserve and restore the Kenai River king salmon stocks. Enactment of 283, would fly in the face of all sound species management knowledge, and, I fear, be the death knell of the Kenai River kings. I urge you not to be a willing party to such action.. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the Kenai kings.

Thomas Watts-FitzGerald

Coral Gables
33134-4765

February 16, 2022

Dear Board of Fish,

I primarily fish the Kenai River and Cook inlet for salmon and halibut. I'm devistated at the recent historic decline of the mighty king salmon in the Kenai, and urge you to do everything within your power to help reverse this trend. It's not too late - please!

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

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Thomas Yukman

SOLDOTNA
99669

February 16, 2022

Dear Board of Fish,

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species. Passing 283 would indicate that the Board has abandoned weak-stock management principles.

The economy of the Kenai Peninsula relies on its salmon fisheries. However, the economics point to the sport-caught fisheries being the economic powerhouse, NOT the commercial fishery. Regardless, we need to rebuild the king salmon runs to support both economic engines. Are you willing to risk an entire species' survival to pull a few sockeye out of the water? Where is the logic in that?

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tim Anderson
Highland
84003

March 11, 2022

Dear Board of Fish,

As a resident of Anchorage for 47 years and avid outdoorsman, including annual fishing trips to the Kenai River, I believe this new policy would further compromise King Salmon fishing there.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tim Ranger

Anchorage
99507

February 15, 2022

Dear Board of Fish,

Avid fisherman in both river and salt. Have lived in Alaska for about 13 years total. We have seen kings basically disappear from most streams and something needs to be done to preserve the king run for years to come. Now is the time to stop all king fishing to allow the fishery to rebound.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Timothy Frantz

Wasilla
99654

Submitted By
Timothy Michael Murphy
Submitted On
2/1/2022 5:40:20 AM
Affiliation

To the State of Alaska Board of Fisheries;

This comment is provided in regard to Proposal 282 regarding interception of Chignik bound sockeye in the Shumagin Islands and Dolgoi Island sections of the South Alaska Peninsula.

Since its release to the public, and first exposure to the State Board of Fisheries showing the incredible numbers of Chignik Bound sockeye intercepted in Area M, the WASSIP genetic study appeared to fall on deaf ears with the management and regulatory personnel of the State of Alaska since 2013.

In 2013, there were 0 proposals passed to effect meaningful regulation change to allow the fishers in Chignik access to the resource that was and is clearly being intercepted in the South Alaska Peninsula.

In 2016, 1 somewhat ineffectual proposal was passed, proposal 186 which would place a "cap" on sockeye harvested in the Dolgoi Island section, the proposal asked for a much lower "cap" number than what was passed as compromise with Area M stakeholders, but managers in Area M were simply unable to manage to the intent of the proposal the 1st year it was made law.

This "cap" is far too high, and in comparison, management in Area M's unwillingness to manage to the intent- to limit interception in the area versus the North Shelikof Management Plan in the Kodiak salmon fishery- allows a fraction of intercept of Cook Inlet bound sockeye as well as ensuring short notice closures to prevent exceeding that cap.

In 2019, The fact that there was fishing gear in the water in June in the South Alaska Peninsula salmon fishery virtually 100% of the time was brought to light, and a proposal was passed to implement very short closures, so there would be small windows that Chignik bound sockeye would be able to pass. 2020 was yet another disaster for Chignik sockeye with NO commercial fishery.

While catches of sockeye in the South Alaska Peninsula were down in 2020, the Bristol Bay sockeye harvest was record setting, if the bulk of the sockeye intercepted in the Shumagin Islands were Bristol Bay bound sockeye the Area M sockeye harvest shouldve remained close to average.

The amount of boats in the South Alaska Peninsula has increased and with it the ability to intercept sockeye has created a condition where very few fish get by as seen by the lack of a sockeye fishery in 2018 and 2020 in Chignik as well as very low sockeye escapements from 2018 to 2021.

Passage of Proposal 282 is a small step in the right direction to returning much needed resource to Chignik fishermen.

Timothy Murphy

February 16, 2022

Dear Board of Fish,

Most sportfishers know what needs to be done to protect the Kenai River king salmon. When the escapement numbers are not being achieved, there is zero scientifically valid reason to risk a single king salmon's opportunity to spawn.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Tingey Melvin

Centerville
84014

February 15, 2022

Dear Board of Fish,

The Optimal Escapement Goal (OEG) is a higher threshold intended to not only halt salmon decline but also allow the fishery to recover. The Sustainable Escapement Goal (SEG) is the absolute bare minimum number of fish needed for the species to survive and does nothing to improve the fishery. Ultimately, if Proposal 283 is passed, survival of the king salmon fishery in the Kenai River is further threatened.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

TJ Nickel

Anchorage
99504

March 07, 2022

Dear Board of Fish,

Let the Kings reach their spawning grounds, give the local guides and tourist anglers the chance at catching the Kings

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous “over escapement” issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Todd Hall

Aurora
80015

February 18, 2022

Dear Board of Fish,

Been fishing the Kenai with family and friends since mid seventies have seen many changes some good like horse power reduction, more bad erosion, to many guides with to much pressure on kings, to much set netting and commercial in Cook Inlet. Current plan for restrictions for all users is good. Also my family has property on the Kenai river (lower) since 1984.

The OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

Passing Proposal 283 prioritizes a small group of commercial fishing as one third of the set netters would qualify under the proposal. A vote in support of 283 gives a small group fishing preference, further risking the king salmon run in the Kenai River.

Kenai River king salmon have not been meeting spawning objectives for years, and Proposal 283 potentially allows the commercial harvest of kings when we haven't clearly met the lower escapement goals.

Currently ADF&G cannot reduce fishing restrictions until the OEG is achieved. If passed, Proposal 283 would allow projected escapements to be utilized rather than actual fish in the river. It's literally putting the cart before the horse; commercial fishing will be permitted before sufficient king salmon have actually made it into the river, based on the OEG.

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Todd Halverson

Anchorage
99515

February 15, 2022

Dear Board of Fish,

Are you kidding me? This is such old news…and I'm 61 years old! Time for these people to grow up.

I thank the Board for the historic actions taken in 2020 to protect the Late Run Kenai River king salmon. Modifications like 283 threaten those protections and is the first step in a slippery slope to lighten the burden of conservation for some users, while maintaining restrictions on others. It disregards the principles of weak stock management and overemphasizes tenuous "over escapement" issues. Finally, this proposal promotes the financial interests of a few entities over the clear need to conserve a species. I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings.

Todd LaFlamme