



February 17, 2022

Dear Board of Fish,

My name is Mark Lambert, and I annually make a trip to Alaska for one reason: to fish for salmon. The health of the fisheries in the whole state is important to me and all of my several friends I bring to your great state. Without proper management you will lose the attraction that brings such a vital boost to your economy. If the fish are not there in good numbers, people simply won't come. And I don't know the numbers but I bet the tourism the salmon bring in small groups of fishermen far outweighs the economic boost of the commercial fisheries, or in other words the commercial fishermen do not provide an economic boost that is as far reaching as the sport fishermen.

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.

Mark Lambert

Twin Falls
83301



February 18, 2022

Dear Board of Fish,

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.

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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Mark Madden

Anchorage
99502



March 07, 2022

Dear Board of Fish,

Fished the Kenai at BIG SKY last July. Caught sockeye but came to Alaska primarily for the Kings. Caught only one in 4 days fishing and was not able to bring aboard for picture. Believe it will hurt sport fishing trade if this continues. In my opinion, reduce the catch of commercial harvest to allow the thrill of Kings on rod and reel.

Good luck Joe

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.

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.

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mark maitz

schnecksville
18078



February 24, 2022

Dear Board of Fish,

We own property on the Kenai River and I have not fished for kings for at least 15 years! I would like to make the Kenai River great again and passing proposition 283 is not going to do it.

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.

Mark Newman

Eagle River
99577



March 07, 2022

Dear Board of Fish,

Our globe's waters are too precious to give commercial fishing even more time in the water. Please do not take away this resource from the people of Alaska and future generations

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Mark Oliver

Sicklerville
08081



March 05, 2022

Dear Board of Fish,

I'm a sportsman raising my family in Alaska. We live in Chitina and Anchorage and fish and dipnet the Kenai and Copper. We dipnet in large part to ensure we are able to harvest the fish we can't catch sport fishing.

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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MARK SPENCER

Anchorage
99502



Submitted By
Mark Wackler
Submitted On
2/7/2022 1:50:14 PM
Affiliation

Phone
907-394-8378
Email
akfishology@gmail.com
Address
PO Box 753
Soldotna, Alaska 99669

BOF,

I am writing in regards to proposal 283. To say I'm strongly against this proposal is a massive understatement, and I hope you feel the same. I cannot understand the rationale that would cause someone to support the certain harvest of MORE king salmon immediately following the worst run in recorded history. It's irrational, destructive, and downright selfish to say the least. I do understand that ESSN members are trying their best to provide more opportunity for themselves, but unfortunately they cannot accomplish that without simultaneously risking a fragile run of genetically significant chinook that may be on the brink of annihilation. If ever there was a time to deny further liberalizations, it's now. This could be the tipping point, and you want to be on the right side of history on this one; the side an overwhelming majority of Alaskans are on!

Mark Wackler



March 07, 2022

Dear Board of Fish,

Please do not pass this bill! If you do you are allowing the big machinery of the money people take over ! I have seen the devastation they do to the sport of your fishing and it is terrible!

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.

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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Marlis Key

Casper



February 24, 2022

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Martha Woodard

Kenai
99611



February 21, 2022

Dear Board of Fish,

I know that I don't live in Alaska, but I still view it as the last frontier. My wife and I love visiting your great state. The fishing and hunting are fantastic. I fear commercial fishing in the kenai during the king runs would do irreversible damage to the 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.

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Martin Coffey

GASTON
47342



February 16, 2022

Dear Board of Fish,

I live in the Kenai area because of the natural resources. Sport and personal use fishing is very important to me and my family. The commercial interest to should be limited just as the other users. Obviously there is a greater financial interest to boost open commercial fishing. Before they get a larger share how about one season of observers and see if the claimed king bycatch number is honest. Wildlife officers are checking personal use but are they checking commercial setnetters?

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Martin Thurber

Kenai
99611



February 24, 2022

Dear Board of Fish,

I've been an Alaska resident for 36 years, fishing the Kenai and many other Alaskan Rivers for salmon. I believe mismanagement and unknowns on the open sea have led to the near extinction of Kings in the Kenai and many other area rivers. I don't believe you can continue decreasing the spawning stock and continue to have King salmon in the Kenai or other Cook Inlet rivers. Fishing at the mouth of the Kenai needs to be restricted for commercial fishers as well as other users, as King Salmon stocks are significantly down from previous years.

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Mary Anderson

Anchorage
99516



February 26, 2022

Dear Board of Fish,

Prop 283 should receive a resounding NO vote. It shouldn't even be considered. This proposal will allow for the killing of More Kings and will never allow for enough returning Kings to keep the population healthy. Should this type of proposal be allowed then eventually the Kenai River Kings will become endangered then it will become a Federal fish. This will never come to good for anyone using this resource. Everyone must be willing to give up something for the maintaining the species. This proposal is nothing more than the fox guarding the henhouse. Vote No!! Please for this magnificent species keep the fox away.

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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Mary Mundell

Ninilchik
99639



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Matt Ashcraft

Eagle Mountain
84005



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Matt Lewallen

Anchorage
99515



February 15, 2022

Dear Board of Fish,

This plan is asinine, and only a complete idiot would support it. We all know, even if you idiots on the Board of Fisheries want to bury your heads in the sand and try to avoid it, that the Kenai River fishery is in big trouble... especially the chinook runs. Now, on the heels of reports that the sockeye fishery is expected to see extremely low numbers this coming year, you want to cut corners... put the chinook fishery at continued risk... so the commercial ocean rapists can take more sockeye? Idiots... all of you. You won't stop until the Kenai chinook run is completely gone.

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Matt Lund
Anchorage
99507



February 16, 2022

Dear Board of Fish,

I've been to Alaska fishing salmon once and can't wait to go again. My uncle goes every year and he has invited me to go with him again. The fishing was like nothing I've experienced in Utah. I can't wait to go again and I don't want the resource to be abused or taken advantage of.

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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Matt Taylor

Riverton
84096



February 26, 2022

Dear Board of Fish,

I enjoy fishing the Kenai and hope to someday enjoy with my grandkids. Please stop allowing the over fishing of this river.

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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Matt Weller
55082



February 15, 2022

Dear Board of Fish,

I live on the Kenai River and want to help protect the King run and see it rebound!

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Matthew Richards

Soldotna
99669



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Max Eckhardt



February 15, 2022

Dear Board of Fish,

As a life long resident and sport fisherman of the Kenai, I have seen the alarming decline of the Kenai kings first hand in just my short lifetime. The Kenai is home to one of the last great King salmon runs in the world and we have a moral obligation to choose their preservation over the very minimal economic impact of commercial fishing.

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Max Handley
Kenai
99635



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McKinley Holtan
99503



February 18, 2022

Dear Board of Fish,

Recommend not passing this bill. Think long term. Follow the science not the money. We are long term residents and want to see our kings return

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.

Meredith Johnson

Anchorage
99507



February 27, 2022

Dear Board of Fish,

My name is Michael Ahart and I live in La Grange, TX. Please do everything possible to protect and improve the fisheries of Alaska with emphasis on the Kenai River. As we all know, this a truly unique and special resource worthy of protection and 283 is a poor idea.

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.

Michael Ahart

La Grange
78945



Submitted By
Michael Kurtz
Submitted On
10/4/2021 3:52:45 PM
Affiliation

1. Attn; Board Members;

- My name is Michael Kurtz. i am presently a active arema m purse seiner. i drifted arema m for 4 years . and have purse seinered for 51 years.
 - i oppose an agenda change request for this year rather than or normal cycle. Although Chignik met its excrement goals and fished everyday the later part of the season they are requesting a agenda change. with covid still a factoer and this meeting would be virtual. wouldn't be here to have this meeting on schudule where hopefulluy we could be in person? i would say in person interaction would be much better for information.

in my 51 years in arera m i have seen many differant scenarieous, meaning weather / fleet size fishing time/ differant caps/area cloaures. after all we have done nothing stands out as something that effects chignik for the better or worse. could it be that black lake is having environment problems and they need adjust there escapament goals? Could it be they need a mangement plan where they fish outside and make a living until the lagonia adjustes? Now they want to have more closures in the Shumagins islands which the wassip study shows has very little impact on chignik.

The thing about the Shumagin island is that there are only a few sets. So when you have a small fleet or large fleet they all end up on the same sets and catch does not change dramtially. As for the agenda change request regurading the June chum catch, i feel there is no cause for that. Both the 1987. tagging study and recently the waassip study show the june fisher inarema m has little effect on ayk summer and fall chums. on the years where we have a spike in june chum catch they are usally largely comprised of 2 to 3 pounds,whitch are Hokaido and Russian. I thank the board members for rerading my comments.

Michael Kurtz owner/skipper F/V Nicholas Michael



February 17, 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.

Michael Logan

PalmerPalmer
99645



February 17, 2022

Dear Board of Fish,

Hello, I am a born and raised Alaskan. I love to participate in local fishing opportunities. Over the years the option to target a King Salmon off the road system has dwindled to a very small chance of success. We, my family would love to see these fish come back to fishable numbers. Maybe we could limit trawlers in our waters to help protect our King Salmon. Just a thought.

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.

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.

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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Michael Logan

Palmer
99645



February 26, 2022

Dear Board of Fish,

Hi, I am from southern Illinois and only get up to Alaska every couple of years and it is important to keep the sport fisheries thriving, So many of the King Salmon fisheries are pressured too much already without adding more commercial fishing. There is more gain made from sport fishing than meets the eye, it starts with airfare and ends in the mom and pop places where a few bucks are spent.

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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Michael Logue

Brownstown
62418



February 22, 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 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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Michael Peacock

Kasilof
99610



February 15, 2022

Dear Board of Fish,

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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.

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Michael Schierman

Wasilla
99623



Submitted By
Michael Towle
Submitted On
2/12/2022 10:26:09 AM
Affiliation
Fisherman

Chairman and members of the Board,

My name is Michael Towle. I have lived and commercially fished salmon out of Cordova for the past 17 years. My wife and I, along with our 3 young children, have been participating in the PWS shrimp fishery for going on 4 years. We operate in this fishery aboard our 32 foot bow picker.

Proposal #238 Oppose

Proposal #247 support

As a commercial fisherman, I would like to see management strategies undertaken which would optimize the efficiency of the fishery. More pots would mean a shorter season and less overhead for the commercial users. My family and I currently enjoy the fishery as time together on water, but it has little economic value due to the inability to efficiently harvest the GHL in a timely fashion. I would like to see management strategies that would optimize the commercial viability of this fishery.

In my experience, this fishery can support a higher pot limit. A higher minimum pot limit of 50 seems a reasonable starting point to give the users a greater chance to find and harvest the quota in a more timely fashion.

The pot limits each season have been adjusted based on registered participants. It seems that may be a fine strategy for the sport user group, but in a commercial fishery it decreases the economic incentive to go out and harvest the resource (which is already capped by the GHL anyway). With the current pot limits, an average 3 day trip typically yields \$226 after \$824 of expenses. If the pot limit were increased to 50, then a 3 day trip would yield **\$1216** after \$884 of expenses. (Please see the financial breakdown at the end of my comments for a picture of profits/expenses from a typical fishing trip on my vessel).

As the fishery stands right now, it is difficult to realize much of a profit with drawn out seasons and pot limits that retard the pace of the fishery. **A management strategy in which opener lengths are adjusted according to the number of pots registered to be fished would make for a more viable commercial fishery.**

Proposal 248 Support

Proposal 251 Oppose

Proposal 252 support

As a commercial shrimp fisherman, much of my overhead in this fishery is fuel. It is very inefficient for each vessel to run small quantities of shrimp long distances to make a landing. Most of the fishing areas that are open are far from any place one can land and sell shrimp. A vessel can only hold shrimp for a short time unless it has the ability to freeze on board. This forces us to run our product long distances at a high fuel cost. With current pot number restrictions, it is highly improbable that a single vessel will catch enough shrimp to justify the cost of returning to port to make a delivery. Often, I am happy to break even in this fishery. This is not economically sustainable from a commercial standpoint.

The ability for a catcher vessel to tender shrimp for others would allow the vessels which are participating to at least strategize or work together to realize profits and keep their overhead reasonable.

Concluding Thoughts

My wife and I are fisherman raising 3 children in Cordova. We began participating in this fishery to see if it could serve as a means to supplement and diversify our fishing income. This fishery has been an amazing opportunity for us to enjoy time on the water as a family, but needs a few changes to be commercially viable.



From an **economic** standpoint, I would quit this fishery. The reason my family and I continue to operate in this fishery is because we have a blast with our kids exploring the sound looking for shrimp. But this is a commercial fishery. We are also trying to run a business. I have heard from other fisherman things like, "I'm happy to break even" or "I just want to get my home pack". This mentality does not make for a thriving industry. There are a few regulatory changes proposed which could turn this narrative around and allow fisherman to realize some profits in this fishery. **Regulatory changes which increase the economic feasibility of this fishery, while maintaining sustainable management strategies, would be a huge benefit to commercial operators.** Thank you for your time.

An example of the economics of this fishery

I present the following example of the economics of this fishery based on numbers from historical data from ADF&G surveys as well as from my own commercial experience. I have listed all the numbers used so one can see the break down, but what's important here is the value of the catch versus the overhead. I will use my vessels data regarding fuel consumption and run time. This year's fishery will be in area 1 so I'll run the numbers as though fishing in Unakwik.

A reasonable catch per pot usually hovers around 2 pounds of whole shrimp per pot for a 24 hour soak (note: fish and game's survey pots soak for about 20-22 hours per "Operational Plan: Assessment of Spot Shrimp, Pandalus platyceros, Abundance in Prince William Sound, 2015 through 2017"). Typically we tail the shrimp on water and lose roughly half the weight. I sell tailed shrimp for \$14 a pound to a processor. Let's assume a 25 pot limit as was in place in 2019. Unakwik in Area 1 is roughly 80 nautical miles from my landing port of Cordova. I typically travel at 20 knots when laden with pot gear and burn 19 gallons of fuel per hour at that speed. I can typically hold shrimp for up to 3 days. Ok, let's run the numbers for what may be considered an adequate or average catch:

Pot pulls per trip

Pot limit: **25 pots**

Soak time between pot pulls: 24 hours

Days fished before needing landing: 3 days

Number of Pot pulls: 75 pots

Total Value of Catch per trip

Catch per pot: 2 pounds whole shrimp

$$2 \text{ lbs/pot} \times 75 \text{ pots} = 150 \text{ lbs}$$

Total harvest of whole shrimp: 150 pounds whole shrimp

Total harvest adjusted for tails: 75 pounds

Price per pound tailed shrimp: \$14 per pound

$$75 \text{ pounds} \times \$14 \text{ per pound} = \$1050$$

Total value of catch per fishing trip (landing)= \$1050

Cost of trip (Note: For simplicity I am only showing the major costs. The actual overhead is slightly higher)



Fuel

Distance traveled to and from fishing ground (round trip): 160nm

Speed traveled: 20 nm/hr

Time traveled: 8 hours

Fuel burn rate: 19 gal/hr

Fuel burned traveling: 152 gallons

Fuel burn on fishing days: 12 gallons per day for 3 days = 36 gallons

Total fuel: 188 gallons

Fuel Cost (at \$4 per gallon): **\$752**

Gear

Pellet Bait: \$60

Fish oil: \$25

Total overhead for 1 trip prior to landing: \$824

$\$1050 - \$824 = \$226$

Total Profit= \$226 per 3 day trip

This profit per trip for time spent on water does not make sense from a business standpoint. Yes, it is possible to do better, but also much worse. These numbers I present are representative of fairly typical shrimping. However, this is not reflective of a lack of the resource. **It is reflective of gear efficiency.** If one were to run the numbers with double this pot limit one can see how the math begins to pencil out for a viable commercial operation.

Value of catch would go to \$2100 while the overhead per trip would remain fairly the same other than bait (another \$60). So the same length trip could yield **\$1216** (versus the previous \$226) Now the fishery begins to make economic sense.

Furthermore, if shrimp boats were allowed to be tenders for each other, suddenly overhead decreases by a huge margin. Some boats could eliminate the need for all those travel costs and could save upwards of \$750 per 3 days on water. A vessel such as mine could then expect to earn **\$2,000** per 3 days on water on average. From a management standpoint, this would decrease the season length, but greatly increase profitability.

I have heard some fisherman like the season lengths protracted so that they may participate in the fishery as time allows. Some like low pot limits so they can easily manage a smaller number of pots. There is a subsistence fishery and sport fishery to serve this exact purpose. A commercial fishery is supposed to be of economic benefit for the users and the state. Specifically, **Proposal 247 and proposal 252** would make for a more viable commercial fishery from an economic standpoint without excluding any of the current user group.

If there are any questions concerning my comments I'd be happy to talk them over. I can be reached at (907)253-6453. I included this last bit as I felt it is the bottom line of what we as a fishing fleet are dealing with as **commercial** operators. I know every fisherman's vessel and market situations vary so there is certainly some differing numbers, but this is how it looks for many of us.



March 01, 2022

Dear Board of Fish,

Michael Tuhy here... I have been sport fishing the Kenai @Tower Rock Lodge for 31 years and seen lots of changes and sadly, the diminished King populations. If you follow strictly the biological science and the economical data it is impossible to arrive at any other conclusion... let alone the future importance of tourism.

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.

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.

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?

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.

Michael Tuhy

Soldotna
99669



February 19, 2022

Dear Board of Fish,

I live on the Kenai River and I hate seeing the extermination of the Kenai Kings. Action must be taken protect the species for our river. The pressure from the commercial fisheries is too much. If action is taken now to help, the population can rebound and everyone can benefit. If nothing is done, there will be nothing left to protect and nobody can enjoy the Kenai Kings.

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.

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Michael Watson

Sterling
99672



February 25, 2022

Dear Board of Fish,

I've lived in Cooper Landing and now Girdwood. I fish the Kenai during the spring summer and fall for catch and release trout and steelhead. I harvest some sockeye. I quit targeting king salmon 12 years ago because I saw a drop in their survival. I figured the state of Alaska could manage this fishery better. But seeing this proposition disgusts me. Bycatch is a huge problem in the fishery industry and to let commercial nets go out during a time when kings need to get up the river is absurd. There's rules that are set out and the commercial fishery should abide by them also and remain closed as sport fishing is. The sockeye use the same route as the kings! Come on quit killing the kings, they are a special breed.

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.

Michelle White

Girdwood
99572



February 15, 2022

Dear Board of Fish,

I am a born and raised Alaskan. While I live in Anchorage, I am also a land owner on the Kenai River. As we have all seen the decreasing King run and strong Sockeye runs, I understand the position you are faced but I would like to urge you to consider the need to rebuild and protect the King run. The King run is vital to the economics of the Kenai Peninsula.

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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Mike Brown

Anchorage
99515



February 16, 2022

Dear Board of Fish,

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Mike DeMaria

Greensboro
27406



February 17, 2022

Dear Board of Fish,

I travel all the way from Pennsylvania to fish the Kenai River for kings. All this would do is reduce my chances and my friends' chances to catch a fish of a lifetime. We are all opposed to proposal 283. Thank you.

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.

Mike Drewnowski

Franklin
16323



February 16, 2022

Dear Board of Fish,

I live in Sterling Alaska. I have fished the Kenai River since the early 70's. I think it very important, not only me but to future generations, that responsible, balanced management of Alaska's fisheries is critical to improving the Kenai River Fishery.

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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Mike Griffin

Sterling
99672



February 16, 2022

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Hansen Mike

Price
84501



March 12, 2022

Dear Board of Fish,

I was born and raised in Alaska since 1957. I fish and hunt all over the state and have property on the Kenai and Chulitna rivers.

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 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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mike huston

anch
99501



March 08, 2022

Dear Board of Fish,

I lived in Alaska from 1997 until 2004. As an avid outdoorsman and outdoors enthusiast I spent a significant amount of time on the Kenai Peninsula fishing. The river was under serious pressure back then from both the commercial harvest of King Salmon as well as the sports fishing. It was declining but nothing like today. I continue to visit Alaska every summer for at least one month. I spend thousands of dollars supporting the local economy. However as I walk through the stores I don't see near the number of people that I saw back then during July and August. At one time you could find a parking spot at any of the boat launch areas unless you were there by 4 am. Now there is no problem finding a spot as there are far less people traveling to Alaska to fish the Kenai river. As a sportsman in all my yrs fishing the Kenai I have kept 1 King Salmon and it was an under 30" fish that had a hook down in it gills from being caught previously. Otherwise I would have released it. When the river shuts down to sport fishing including catch and release for Kings things are so bad that every fish makes a difference. To allow the commercial fishing to continue at this point makes absolutely no sense whatsoever. To vote yes on prop 283 is not the the beginning of the end to the Kenai King salmon because that is already in motion. Yes to 283 is THE END of the Kenai Kings. Vote No and protect this species for generations yet to come.

Thanks

Mike

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.

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.

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.

Mike Kasecky



February 20, 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?

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.

mike marlatt

Pillager
56473



Submitted By
Mike Sullivan
Submitted On
3/5/2022 2:00:40 PM
Affiliation
Resident

Phone
907 602 2577
Email
ms_flagship@yahoo.com
Address
10647 Flagship Circle
Anchorage, Alaska 99515

PWS Shrimp Fishery:

Greetings---I'm a 50 year Anchorage resident who enjoys local seafood, especially the sweet shrimp from PWS. This delicacy is a rare local seafood that can be enjoyed fresh from the ocean. I'd like to offer comments on the proposals before you that would limit my ability to purchase this product from local fishermen. Specifically I strongly support Proposal 240, 242 and 246.

I also support Proposals 244 and 245 to increase the ability of ADFG to manage the noncommercial shrimp fishery in concert with their management of the commercial fishery. This is critical to ensuring healthy harvest levels for this important resource and a level playing field.

I'm a senior citizen without the expertise or expensive boat that's required to participate directly in this local fishery. It is not only too expensive but impractical for a 68 year old landlubber to safely operate a vessel to access the dangerous waters of PWS. My ability to secure this common property resource depends on being able to purchase shrimp from local fishermen. It's grossly unfair that current harvest limits apply only to commercail fishermen thereby limiting myself and most other Alaskans ability to consume this special treat, while elitist boat owners consume, give away and likely even sell unlimited amounts of PWS shrimp.

Currently the availability of such shrimp is often limited to a few weeks a year. Some years much less time, in rare years a little more. I'd appreciate a longer season with more reliable delivery dates. Current management is skewed towards the sport fishery to the detriment of the vast majority of Alaskan residents in general and area residents in particular. All users should share in the conservation of and access to this public resource. The BOF should adopt policies that protect shrimp populatons and share the burdens of conservation. Current management is very unfair to all nonboat owners.

I appreciate your consideration of my comments and look forward to the BOF adopting an equitable management strategy for this important local fishery. Thanks ms



February 16, 2022

Dear Board of Fish,

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.

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.

Mike Wheat
Soldotna
99669



March 02, 2022

Dear Board of Fish,

This should not even be a proposal, the state of Alaska needs these Salmon to bring life back to the community, and the people of the world. Also my grandchildren need to know the thrill of fighting one of these magnificent King Salmon .

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?

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.

Monte Kiggins

Anchorage
99517



February 17, 2022

Dear Board of Fish,

I've traveled to Alaska fishing 40+ times. Look at the king numbers from 2001. Don't destroy the fishery anymore just for money

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.

Monte Wzite

Billings
59102



Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

March 10, 2022

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

I am from Chignik Bay and have fished with my Dad since I was a little girl. I am trying to save up money to pay for college after I graduate from high school. These past few seasons have made it hard to do so. Everyone in Chignik is dependent on salmon fishing. Our salmon runs are essential for subsistence and commercial fishing. Our economy is built on our two sockeye runs, which have gone from historically strong to historically weak - especially the early run, which has not even reached the lower end of its escapement goal since 2017.

Proposal 282 is important to Chignik as it calls for the Shumagins and Dolgoi fishing areas to assist in our early run reaching its escapement goal. I think it's reasonable because we have 55 years' worth of data that has consistently shown Chignik-bound sockeye are caught in those areas, our early run has not reached the lower end of escapement goals since 2017, and thus far the burden of conservation has been shouldered solely by Chignik while Chignik-bound sockeye continue to be harvested in Area M.

While Chignik communities have small representation, we need you to help protect our sockeye run. Please make conservation of our early sockeye run a priority by passing proposal 282.

Thank you,

Mylicia Kopun



Submitted By
Nancy Hillstrand
Submitted On
3/8/2022 11:42:11 PM
Affiliation
Pioneer Alaskan Fisheries Inc.

Phone
907-399-7777
Email
bear@alaska.net
Address
Box 674
Homer, Alaska 99603

Hatchery Committee Meeting

Pioneer Alaskan Fisheries Inc.
Box 674 Homer, Alaska 99603
907-399-7777
March 8, 2022

Greeting Board of Fisheries

1. Please consider applying the Sustainable Salmon Policy 5 AAC 39.222 as a guide for the Hatchery Committee to create specific frameworks for meaningful non regulatory actions for hatchery issues of concern.

5 AAC 39.222(a)(3) To effectively assure sustained yield and habitat protection for wild salmon stocks, fishery management Plans and programs require specific guiding principles and criteria, and the framework for their application contained in this policy.

Three concerns that would be assisted with a framework are to

1. determine acceptable or unacceptable stray rates,
2. transparently archive hatchery data and activity on the ADFG website
3. Rebalance Regional Planning Teams ADFG voting members with backgrounds in ecology genetics and other species.

Alaska has specific hatchery guiding principles and criteria in our laws and policies to assure sustained yield. Few comprehend and apply hatchery principles and criteria, because most have never read the complex hatchery laws and policies so application languishes or is not consistent.

Hatchery Fishermen are confused by the lack of framework that clarifies there is more than **Economy** involved in artificial production of salmon. There is also **Ecology** and **Genetics** purposely designed into law to effectively assure sustained yield of wild salmon starting with the mandated intent of the PNP Hatchery Act.[\[1\]](#)

When these laws and policies were created, they were attended by 147 ADFG personnel of the FRED[\[2\]](#) Division. This army had no harvest constituency but was disbanded in 1991, so the ADFG oversight over hatchery laws has been fragmented ever since.

Just stating "we follow the laws" without following the laws, jeopardizes salmon. It needs application.

The sustainable Policy asks for a "framework for their application contained in this policy". The Hatchery Committee can begin to provide with the department, this structure of guidance to apply these principles and criteria.

Acceptable stray rate

Mark tag lab hatchery stray sampling proportion data needs to get off the shelf and be integrated into guiding principles and criteria using the anadromous waters catalogue for a living working structure designed to ensure wild fish productivity and genetic diversity is not overwhelmed further by hatchery fish genetics.

This is a sorely needed specific framework to guide the department on a defined acceptable or unacceptable rate of straying under the hatchery permits. This problem has no consistency to align with the Genetic Policy, Comprehensive Plans, Escapement Goal law and the Sustainable Salmon Policy. Presently this known risk to wild salmon has no metric.

For the application of sound, precautionary, conservation management practices,[\[3\]](#) unacceptable straying in wild systems can use the framework already available of the interactive anadromous waters catalogue by applying a GIS layer where the Mark Tag Lab otolith



sampling results of straying can be applied and a sliding scale using software that “considers factors including environmental change, habitat loss or degradation, data uncertainty, limited funding for research and management programs, existing harvest patterns, and new fisheries or expanded fisheries”^[4] which in hatchery terms means remote release sites.

Archive Hatchery Data Means having easily accessible information open to the BOF, the Department and the public to provide history of annual Management Plans AMP’s, Permit Alteration Requests PAR, Regional Planning Team minutes, Hatchery Permits, Hatchery Service Contracts, egg sales, etc.

Regional Planning Team diversity of knowledge creates balance for sustained yield of wild fish priority.

Thank-you for your consideration.

Please consider putting together a task force that can help

[1] PNP Hatchery Act Section 1. INTENT. It is the intent of this Act to authorize the private ownership of salmon hatcheries by qualified nonprofit corporations for the purpose of contributing, by artificial means, to the rehabilitation of the state's depleted and depressed salmon fishery. The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.

[2] Fisheries, Rehabilitation, Enhancement and Development Division

[3] 5 AAC 39.222 (a)(1)

[4] 5 AAC 39.222 (a)(2)



February 18, 2022

Dear Board of Fish,

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.

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?

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.

Natalie Casebeer

Soldotna
99669



February 25, 2022

Dear Board of Fish,

This measure supports no local community with regards to future consideration. Weaker returns will result in loss of kenai kings for our youth and future generations.

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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Nathan Blome

Anchorage
99516



February 15, 2022

Dear Board of Fish,

Please figure out a way to catch sockeye without continuing to endanger the genetically unique Kenai kings. Kenai kings are iconic and deserve so much more protection than they are given. Please for our childrens children find a better way to harvest sockeye without endangering kings. Thank you!

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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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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Nathaniel Sims

Albuquerque
87106