

RC \_\_\_\_\_

RC 239

Elbridge G. Walker  
McRoberts Creek Property Owner  
1001 Boniface Parkway - Office  
Anchorage, AK 99504  
(480) 747-5725

February 9, 2014

Re: Board Procedure and Recommendations of Substitute Language for Proposal 135, RC 236 and RC 237

Dear Mr. Chair and Board Members,

After carefully reviewing the proposals set forth in RC 236 and RC 237 there are very serious flaws that need to be addressed. It is my understanding that a compromise was almost reached similar to proposal RC 99, which I submitted. It is also my understanding that after my compromise in RC 99 was considered, substantial and serious political pressure was put on board members to sway away from this. My first question is why is the Mat-Su Borough Fish and Wildlife Commission making proposals they know have no scientific evidence, nor common sense? Secondly, it is my understanding that political pressure is also coming from the KRSA, which leads to the question of why are they even involved as this is not their primary focus? There is no other reason unless it is to completely allocate fish to the sport fishery in all districts of Upper Cook Inlet. This is obvious and totally against the direction set forth in the Upper Cook Inlet Management Plan.

I will go a bit further here. This Board has not been following the guidelines set forth in "Types of Business Meetings" or the "Suspend Rules" sections as set forth in the "Roberts Rules of Order." I have seen repeated violations by the Chairman during my presence at these meetings, which were directed to accomplish a certain outcome, which is definitely a violation of the provisions set forth in "Roberts Rules of Order," especially pertaining to the "Adjourned Meeting" subsection of "Types of Business Meetings" section and further noted in the "Suspend the Rules" section.

The barbless hook proposal, which was a serious conservation measure to help the Kenai in river fishery was adjourned early for the day by the Chairman when it appeared that Board as a whole was leaning to approve the measure. It has been very obvious that if an allocative measure appears to not suit the sport fishery, the Chairman adjourns or moves discussion forward to another proposal to allow sport fish interests to sway the Board. Moving the discussion forward in itself is okay, but allowing members to be handcuffed overnight by any special interest group after an early adjournment which does not follow the rules stated in the sections and subsections below is a clear violation of Board Rules. Also, it should be noted that not finishing business without specific motions as stated below in this paragraph prior to the regular meeting closure is a clear violation of Board rules. Please read "Adjourned Meeting" subsection in "Types of Business Meetings" and the "Suspend Rules" section of "Roberts Rules of Order."

With this said I will move forward with my responses to RC 236 and RC 237. With the genetic catch data

showing that on regular openings the Northern District Sockeye and Coho catch is only 1-2% percentage points higher on full regular openings in the entire Central District from that of the Expanded Kasilof and Kenai Corridors. It should be noted that these stocks are mixed throughout the inlet between the 8th and 15th and the 23rd and 31st of July. When I submitted RC 99 it was with the intent to give the Commercial Fisheries Management team the tools to manage a run of any size and strength as it was based on the timing of interception. Especially now that they have very limited set net use to manage sockeye returns. As I stated in RC 99 July 12th - July 22nd is the time these fish can be harvested with very minimal interception issues without tying the hands of management on a much larger Kenai and Kasilof run. Timing is the key interception issue, not area as most of these fish move through the Central District of the inlet in 1-2 days. This timing data is very clear in all historical catch and genetic studies.

It is also clear that there are very serious habitat concerns as well as invasive species concerns in the Northern District. To claim that the drift fishery is responsible for these issues is ignorant and dangerous to the overall good of all fish throughout the inlet. It will lead to the impossible management of the runs to the Kenai and Kasilof Rivers. Pike are cannibalistic fish that will eat everything out of a lake or stream until they themselves are gone or have the means to move to another area that will support their voracious appetite. It is not the fault of the drift fleet that these fish have been introduced by sport fisherman "bucket brigades" and have now migrated throughout the Susitna drainage and south through the saltwater to streams such as Theodore and Chuitna Streams.

I have asked this board for an advisory vote in RC 207 to help get funding to eradicate the Pike. The fact is RC 236 and 237 is a slap to the face of sport fisherman and commercial fisherman alike, in the fact that the only solution is to keep feeding the Pike with our precious salmon fry instead of creating a means to eradicate them and help all user groups. Throwing more fish at these rivers is a clear indicator that everyone wants to sweep the Pike problem under the rug and eliminate the commercial fishery, instead of dealing with it. The continual declining returns of Coho and Chinook Salmon are a clear indicator of this and soon there will be no more or very few fish to harvest. What was a sustainable fishery of awesome fishing, will soon be something of history that we tell our children about because we refused to act.

In RC 236 and 237 there is no way to manage the Kenai and Kasilof Runs. Over escapement and weak runs will prevail if corridors are used as a means of management. Once the fish are caught in the first half mile of the corridor they will sound and not come up until they are near the river, therefore making management of large masses of fish impossible.

Placing run strength data in the regulations only ties the hands of the Manager. Run strengths must be modeled after catch history is compiled, not on projected run strength. All run strength restrictions need to be eliminated from the language completely in RC 236 and 237. Catch model forecasting is much more accurate and doesn't tie the hands of management.

Here is my proposal in response to RC 236 and RC 237:

- 1) Open Drift Gillnetting in all areas of the Central district from June 19th or the 3rd Monday in June, whichever is later, until July 7th.
- 2) From July 8th through 11th all areas of the Central district will be closed except for the those areas defined in Section 2, Subsections A, B or C of RC 237.

3) From July 12th through July 22nd allow the Commercial Fisheries Manger to open at a minimum, on regularly scheduled Monday and Thursday openers, Area 1 and the Kenai, Kasilof and Anchor Point expanded Sections of the Central District. By EO the Commercial Fisheries Manager has the Authority to open all of these areas, for any length of time, on any number of days, according the the run model generated as fishing data is collected. The manager may also open the entire Central district by EO once escapements are within 250,000 fish of the top end of the OEG for the Kenai River.

4) From July 23rd through August 10th drift fishing is limited to the areas described in number 2 above on regularly scheduled periods or additional time by EO only, if data projects sockeye salmon will exceed the OEG, then it may be opened no more than twice between August 11th and August 15th.

5) From August 1st until September 20th all of Area 3 and 4 are open on regularly scheduled periods, unless closed by EO. Chinitna Bay may only be opened by EO during this time frame as well.

I hope these recommendations will be taken seriously. My interest is in preserving all species of salmon, in a optimal manner, for all user groups, for generations to come.