



February 17, 2022

Dear Board of Fish,

I am Nick Ohlrich co-owner of Alaska Drift Away Fishing. We have been guiding the Kenai and Kasilof for 18 years. Our business stopped targeting native run king salmon on the Kenai and Kasilof rivers in 2013. The deciding factor for us to stop was the brilliant ideas of BOF to reduce the in-river escapement from 25,000 to 15,000 kings "in order to preserve the late-run Kenai Kings. Really? How does reducing the escapement help? I see how the reduction allows for more net time, more money to be made on the COM end, but fail to see how this helps King Salmon.

Here we are again, BOF wanting to reduce the escapement for Kenai Kings. I'm assuming this is for the benefit and sustainability of Kings, as it was super effective when it was cut in half during the BS meeting in the winter of 2013.

I understand that managing a resource with intense Sport and Com interests like the Kenai is not easy, and will never please everyone/anyone. Which in a sense, should make regulating the resource with integrity and ethics easier. Fish first should be the mentality. It is fun to talk about sustainability, ethical management, etc, but unfortunately actions speak louder than words. The actions of the past decade and beyond by ADFG and BOF do not support sustainability, ethics, or integrity. They do showcase greed, deep self interest, and corruption.

Being a guide or a commercial fisherman is a choice and privilege, not a right. Most seem confused by this. If your family has been doing this for generations it still does not become a right. Destroying a species because "I have to feed my family, or I have bills to pay" is not good enough. Get a real job.

Depending on a fish that is born in a river, then swims around the ocean for several years, to come back to that river to spawn, sounds like a sustainable career, then [REDACTED] is deeply intertwined in your DNA makeup.. A fun way to make money, but [REDACTED].

I also know that the majority of the problem stems from ocean conditions as I have dug fairly deep into the topic trying to gain more understanding. Which is much harder than blaming the set netters or King guides for the depletion of Kenai Kings. In my opinion if BOF/ADFG actually did their jobs with ethics and integrity and made a strong stance to preserve Kenai Kings when they had the chance in 2013 the King population would be better but not by leaps and bounds. Surely the thousands of Kings that went into COM nets and Guide boats since 2013 would have been better to let spawn.

So what is the purpose of reducing the escapement again? Are facts painting a picture that the current escapement of 15,000 will definitely keep the King fishing closed on the Kenai and restrictions on the Com industry, which equals less money for Com for the future?

It seems fairly obvious that the state of the King run really cramps the Com balance sheet. Why not take off your sustainability mask and just kill off the run and be done with it versus this slow bleed and trying to act as tho BOF actually cares. I'm sure this would be the best option for BOF.

Let me guess a new escapement of 7,000? I'm sure part of the deal will allow Kenai guides to keep



fishing too. GEEZZ thanks!. In a few years from now what will be the move once the Kenai gets shut down due to it not meeting the new escapement? Or will this new escapement be the one that turns the run around and we'll be back to a robust return of 50,000 kings?

The fact that we are in this situation, and I'm spending time writing this to a board that obviously does not care is disquisting. SO BOF here is your chance to do your job with ehics and integrity. How will you know if your are operating under those measures? Easy, it will be a sensation that noone on the board has ever felt.

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.

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?

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.

Nicholas Ohlrich

Girdwood
99587



February 25, 2022

Dear Board of Fish,

Please vote no on

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.

Nicholas Peters

McCleary
98557



Norine Jones
111 Airport Road
Chignik, Alaska 99564

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

January 15, 2022

I support Board of Fisheries Proposal 282 and ask that you likewise support it.

The following is offered on why Proposal 282 should be passed:

1. Chignik is totally dependent, culturally and economically, on its Chignik River early and late sockeye salmon runs;
2. Chignik's early run has met not the lower end of the escapement goal for the last four years. Failure to meet escapement goals, in back to back years, expectedly will bring future hardships;
3. No Chignik sockeye salmon fishery has occurred on the early run and in only two of the last four years on the late run;
4. In Area M, early-run Chignik sockeye salmon are a viable component of the Dolgoi Island Area and Shumagin Islands catch from mid-June through July (ADF&G WASSIP);
5. The Shumagins and Dolgoi fisheries currently lack any regulation addressing stock conservation, specifically terminal-stock escapement requirements.
6. Under the Sustainable Fisheries Policy the burden of conservation is supposed to be shared and;
7. Chignik stakeholders need relief from carrying the entire conservation burden and Proposal 282 provides a solution.

Please pass Proposal 282.

Thank you and sincerely,

Ms. Norine Jones



February 23, 2022

Dear Board of Fish,

I am an Alaskan that feels it is important that conservation efforts should be shared equally by all users groups.

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.

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.

Norman Straub

Palmer
99645

Corporate Office
2702 Denali St., Suite 100, Anchorage, AK 99503
Phone: (907) 278.6100 Fax: (907) 276.3441

March 2, 2022

Via: Email and FAX

Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 266 [Dungeness Crab Pot Limitations]

Dear Chairman VanDort and Board members:

We support proposal 266 as modified by the Kodiak Advisory Committee.

Dungeness fishing on Kodiak Island, due to our large sea otter population, is mostly limited to a relatively small area on the east side of the Island around Old Harbor and on the south end of Kodiak Island. The fishing effort in these areas has increased exponentially in the past couple of years ---- both the number of vessels fishing and the number of pots being fished by each vessel. In some areas, tenders are having a difficult time navigating between the Dungeness pots to pick up salmon and in other areas, salmon fishermen are pre-empted from fishing traditional spots because of the Dungeness gear. Finally, small boat Dungeness crab fishermen from Old Harbor are finding it increasingly difficult to find places to fish.

Consequently, Old Harbor fishermen submitted proposal 266 and strongly support a Dungeness pot limit for the Kodiak area. We had suggested a range for the Board to consider and differentiate between larger and smaller vessels --- with some deference to a couple of larger local vessels that had been fishing Dungeness crab for many years. The Kodiak Advisory Committee had a lengthy and robust discussion on the issue. There was significant consensus regarding the need for a pot-limit but less unity regarding differentiating between larger and smaller vessels. The larger pot limit for larger vessels was seen to advantage some newer entrants in the fishery and may also attract larger vessels to the fishery --- both of which the Advisory Committee didn't want. In the end, the Advisory Committee compromised on a recommendation of a 700 Dungeness Crab pot limit for all vessels.

Old Harbor still believes that the 700-pot limit is too large. However, we also feel that it's more important to immediately have the Board approve a pot-limit than it is to argue about further



reductions. This is the substance of compromise. We believe the Advisory Committee's compromise is a reasonable first step toward solving the issue of too many Dungeness pots.

If you have any additional questions regarding Old Harbor's support for the Advisory Committee's compromise recommendation on proposal 266, please do hesitate to contact me.

Very truly yours,

A handwritten signature in black ink that reads "Freddie Christiansen".

Freddie Christiansen, Chairman
Old Harbor Native Corporation
Fisheries Committee



**PACIFIC NORTHWEST CRAB INDUSTRY
ADVISORY COMMITTEE (PNCIAC)**

March 3, 2022

Mr. Glenn Haight
Executive Director, Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

Re: PNCIAC Recommendation to Board of Fisheries on Proposal 275

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (BOF) and North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors. PNCIAC, since its beginnings, has worked with the BOF, Alaska Department of Fish and Game (ADFG), the National Marine Fisheries Service (NMFS), and the NPFMC. Together, PNCIAC and the agencies have worked together to improve resource management.

Proposals 275 (Observers)

PNCIAC supports this proposal to extend the observer certification expiration period from 12 to 18 months. This proposal was submitted by ADFG and is intended to help retain good observers.

Thank you in advance your consideration.

Regards,

A handwritten signature in black ink, appearing to read "Steve Minor".

Steve Minor
Chair
PNCIAC
stevem@ppsf.com



March 10, 2022

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email: dfg.bof.comments@alaska.gov

RE: Opposition to Proposal 282

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Statewide shellfish meeting scheduled for March 26 – April 2. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including those that serve fleets in both the Chignik and Area M salmon fisheries. **We respectfully request the Board delay taking action on Proposal 282 and instead consider the proposal during the appropriate in-cycle meeting in 2023.**

Proposal 282 requests further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area and will thus have a significant negative impact on Area M fishermen, processors, and the communities dependent on these fisheries, such as Sand Point and King Cove. These fisheries are critically important to this region, so any further harm should be avoided or at least very carefully considered against other direct impacts.

The Board already (2019) increased the closed areas for all gear types in the South Peninsula June fishery and completely closed the Dolgoi area to seining in June, and there has not been sufficient time for the Board to evaluate whether these actions have had the intended effect on Chignik runs. In addition, there is evidence that a stronger contributor to the strength of the early-run Chignik sockeye fishery seems to be associated with habitat degradation in Black Lake and the corresponding length, weight, and overall condition of out-migrating smolt, which has been poor from 2007 to 2016. The Board should not support a proposal that results in further direct economic harm to the Area M fishery and communities, especially given the lack of clear, corresponding benefit.

There also does not seem to be a downside to delaying review of this proposal until the in-cycle meeting. The proposal is not necessary to address a conservation concern but is allocative in nature according to the ADFG staff comments. Late-run and total escapements were achieved in 2021, and total season sockeye escapement is near the five-year average and increased relative to the three-year average. The ADFG forecast is that Chignik runs will meet escapement in 2022, with an early run of 639,000 sockeye (escapement of 400,000 and harvest of 239,000). If a concern arises, ADFG could continue to use its existing emergency authority to enact further restrictions in Area M, evidenced by

www.pspafish.net

ANCHORAGE

721 W. 1st Avenue
Suite 100
Anchorage, AK 99501
907 223 1648

JUNEAU

222 Seward Street
Suite 200
Juneau, AK 99801
907 586 6366

SEATTLE

1900 W. Emerson Place
Suite 205
Seattle, WA 98119
206 281 1667

WASHINGTON DC

20 F Street NW
Floor 7
Washington, DC 20001
202 431 7220



such actions in 2018 and 2020. Given this and given the complexity of salmon management in Areas M and L, it does not seem necessary or prudent to take immediate action at this meeting.

Waiting until the established meeting cycle is not only good public process but it will allow the Board to consider action in the context of ADFG's review of the Chignik escapement goals, which are being completed for the 2023 meeting cycle and may provide relief to Chignik fishermen. This seems like an extremely important factor to consider. In 2023, the Board can consider the full suite of information, including potentially new escapement goals, and all proposals related to these areas relative to each other.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Barrows".

Chris Barrows
Pacific Seafood Processors Association



February 16, 2022

Dear Board of Fish,

I run fishing lodges in Bristol Bay.

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.

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.

pat vermilion

Livingston
59047



March 11, 2020

Dear Esteemed members of the Board Of Fisheries,

My name is Patrick Brown and I am writing to you in opposition of Proposal 282, formerly known as ACR 7. The economic impact of this proposal will be devastating to the fishermen of Area M, and will likely have a negligible impact on the strength of the Chignik run.

The South Unimak/ Shumagin Islands salmon fishery has been executed under our current management plan, with certain amendments, since 2004. From the years before Limited Entry, through the 80s, our schedule more closely resembled a 5 days per week of fishing opportunity across the South Peninsula waters. Up until 2018, Chignik has had a relatively stable and successful fishery, with virtually no escapement issues throughout its entire history. How can two relatively successful fisheries, which have co-existed for decades adjacent to each other, all of a sudden have a devastating impact on the other?

I believe there are larger ecological and environmental factors at play here, which need to be carefully looked at before we give Area M fishermen sole responsibility for the damages which have occurred in Chignik.

The Forecasted run for the entire Chignik area in 2018 was 1.749 million fish including 738,000 escapement and 1,011,000 harvest. The actual escapement for the year was 539,697 and barely any harvest occurred that year of sockeyes. In the Shumagin islands June Fishery of 2018, 406,806 sockeyes were harvested. In the post June fishery for the entire South Alaska Peninsula, 514,396 sockeye.

Even if every sockeye caught in the Shumagin Islands June and S. Alaska Peninsula Post-June fishery were Chignik-bound (Stock composition data from WASSIP does not support this), it still leaves the question, what happened to the other 288,101 sockeyes? In reality, Black Lake-bound sockeye salmon make up a small component of fish harvested in the Shumagin Islands, and it is very unlikely that this is the case.

While there is no definitive data on where these fish went, scientific data suggests that environmental conditions in the North Pacific may have played a role in the decline of certain stocks of finfish, and abundance of planktonic pyrosomes may have had an effect on ocean conditions resulting in the decline of salmon species.

According to a 2019 article on [science.org](https://www.science.org) website, entitled "Ocean heat waves like the Pacific's deadly 'Blob' could become the new normal," scientists began observing warmer than normal temperatures in the North Pacific, starting in late-2013. This trend continued through late-2016, resulting in ecological collapse from the bottom of the food chain up. In 2017, scientists from NOAA published their findings: 100 million cod fish had "vanished." The heatwave of water, known colloquially as "The Blob," had wreaked havoc on the food chain. It is estimated over half-million seabirds died off, washing up on beaches across southern Alaskan shores. As a result of this heat wave, toxic algae blooms had formed over



much of the north Pacific, and sea creatures typically found in the tropics had emerged much more north than they normally do.¹ These sea creatures are known as pyrosomes, aka sea pickles. According to a 2017 Newsweek article, “Mysterious Sea Pickles Invading West Coast in Bizarre Bloom,” scientists worried that the emergence of pyrosomes, aka sea pickles, and their impending die-off, could result in oxygen depletion due to the decomposition of organic matter. This is basically how the dead zone in the Gulf of Mexico was created, through rapid death and decay of organisms. ² The emergence of these organisms is simply a symptom of an overall ecological problem.

As a set gill netter, I recall many years in recent history of algae blooms in the ocean and the formation of a mud-like material that would stick to our set net web. The material that stuck to our web made it visible in the water to fish, but I believe it also made the water less habitable and either made the salmon leave the area all together, or was a symptom of a larger problem which was high levels of toxicity and low level of available food source. The PSP studies that occur from our local clam beds through our local tribal organization are further proof that PSP levels are dangerously high and have been for several years. Either way, we have definitely seen the impacts of the “Blob,” and our fishery has suffered as such.

Furthermore, an environmental study done by the Army Corps of Engineers, published in October 2012, entitled “Black Lake Ecosystem Restoration Technical Report”, conclusively states: “The average volume of Black Lake over the past 50 years is estimated to have decreased by approximately 25 percent due to the lowering of the average lake water surface elevation with an additional 1 to 5 percent reduction due to lake sedimentation.” ³ However, the Biological escapement goal (BEG) of 350,000-450,000 fish, which has been in place for over half a century, has never been adjusted. With regards to the Proposal 282’s language of the anticipation of the “mid-point” of the run, which refers to the escapement of 400,000 sockeye,

¹ “Ocean heat waves like the Pacific’s deadly ‘Blob’ could become the new normal.” Cornwall, Warren. 31 Jan 2019.
<https://www.science.org/content/article/ocean-heat-waves-pacific-s-deadly-blob-could-become-new-normal>

² “Mysterious Sea Pickles Invading West Coast in Bizarre Bloom.” Main, Douglas. 22 June 2017
<https://www.newsweek.com/mysterious-sea-pickles-invading-west-coast-bizarre-bloom-628338>

³“Black Lake Ecosystem Restoration Technical Report.” Army Corps of Engineers Alaska District. October 2012. P. 47.
<https://www.poa.usace.army.mil/Portals/34/docs/civilworks/archive/BlackLakeTechnicalReportOctober2012.pdf>



ADFG data shows that in the years from 1970-2020, in 26 out of 50 years, the escapement did not exceed 400,000 fish. ⁴

As a fisherman, I understand the frustration felt by weak runs, slow fishing, and lack of opportunity. The current fishing schedule we fish in the South Alaska Peninsula is never a guarantee of catching, but it is what we have operated under for years. Even after Limited Entry allocated our fishery, we have continued to see loss of time, area, and opportunity since the Permit system was enacted. We shouldn't have to be punished because of problems associated with other areas. In 2018 and 2020, we lost significant amounts of fishing time with negligible benefit to the CMA and the sockeye runs there. We have shared the burden of conservation, with minimal results, yet many will lead you to believe this is not the case.

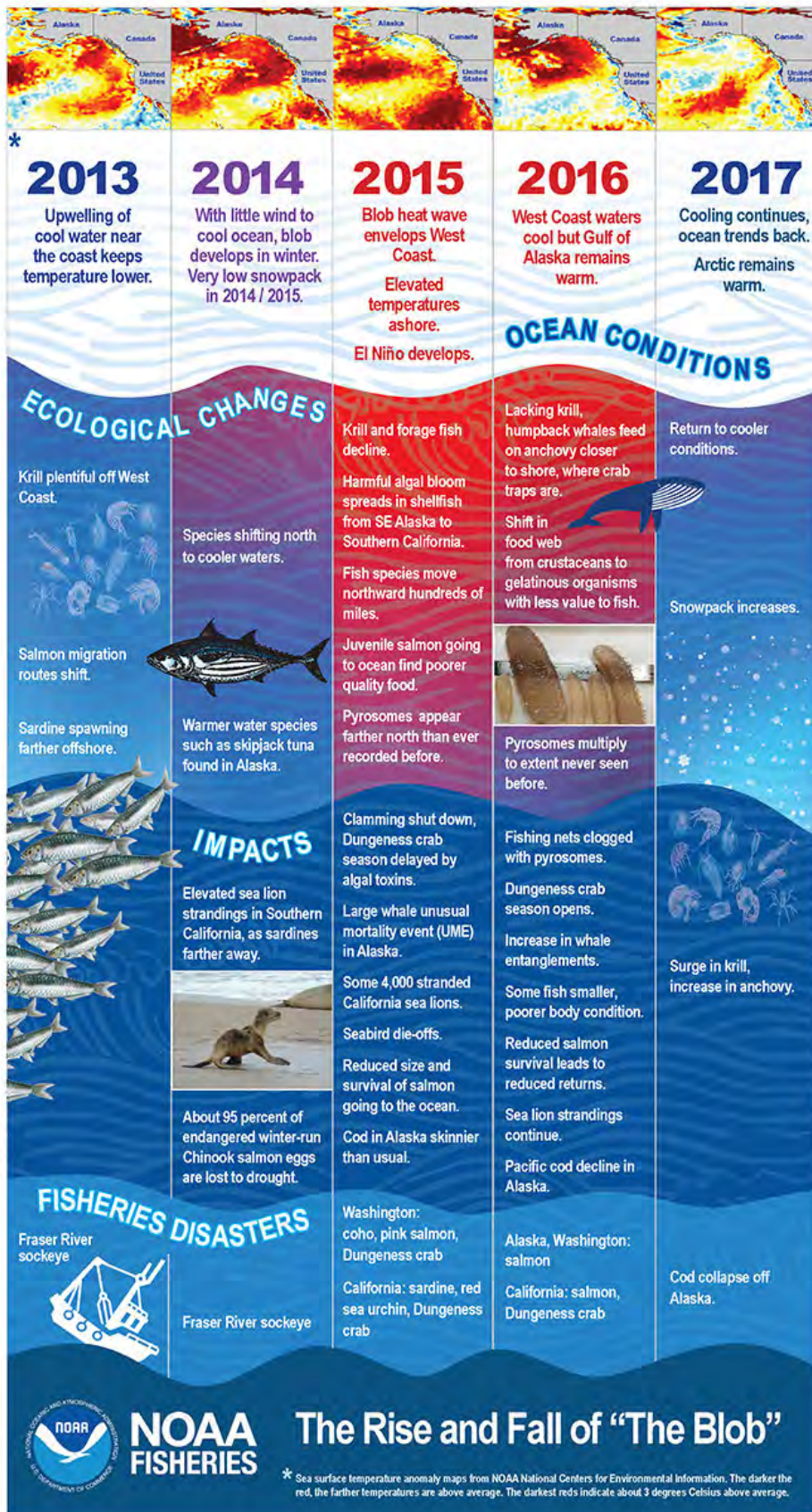
I am a South Peninsula (Area M) fisherman, and I strongly urge you to oppose Proposal 282. There is no scientific evidence that shows that we are to blame for the collapse of the Black Lake run. It's time we start to listen to what the science says, instead of pointing the finger at others. Our ocean is still healing from the heatwave that occurred between 2013 and 2016, but any policy changes you make now could hurt our fishery for years to come.

Thank you for your time and consideration.

Sincerely,

Patrick Brown
Sand Point, AK

⁴"Chignik Management Area Salmon Annual Management Report, 2020"
Ross L. Renick and Michelle E. Stratton. November 2021. P. 50.
<https://www.adfg.alaska.gov/FedAidPDFs/FMR21-11.pdf>





Submitted By
Patrick P McCormick
Submitted On
3/3/2022 2:03:37 PM
Affidavit on

Phone
9072407285
Email
mccormick.patrick@gmail.com
Address
10207 Chatham of Rock St
Eagle River, Alaska 99577

P238

I oppose this as it has no biological or management reason for the closure.

P240

I support this proposal as it fairly allocates the resource, furthermore the sport fishery is open to anyone and is not limited entry meaning sport fishermen can participate in the commercial fishery and keep the sport fishery for personal use if they so choose. Furthermore the commercial fishery harvest is primarily sold to local residents who likely do not have the funds to participate in the sport and recreational fishery allowing more residents to share in the resource and not just wealthy boat owners.

P242

I support this proposal if P240 fails to pass. Conservation burden should be split fairly between user groups.

P 247

I oppose this proposal as this would allow those with capital to dominate the fishery. The PWS sport fishery is unique because anyone with a boat can participate. By creating a minimum legal amount of pots those with large boats who can effectively fish those pots and who can afford gear for those pots will have a distinct advantage over those who cannot safely fish that many pots or who lack the capital to purchase that many pots.

P 250 I oppose this proposal, weather in March is typically much worse and more dangerous than in April, this would unfairly advantage larger vessels and concentrate smaller vessels in smaller protected areas.

P 252 I strongly support this proposal, allowing fishermen to fish as a coop has no downside and would allow smaller less efficient vessels a better chance at delivering higher quality sport fish to market.

P 283. I strongly support this proposal. ADFG should have more tools to better manage our fisheries.

—
Patrick McCormick

F/V Sportsman, Chugach View Outfitters
Anchorage, Alaska



Submitted By
Patrick Puskus
Submitted On
2/10/2022 8:40:20 PM
Affiliation

Phone
907-539-2843
Email
ppuskus@acsa.alaska.net
Address
P.O. Box 2843
Kodiak, Alaska 99615

Comment from Patrick Puskus

Kodiak

Re: Proposal 271

I am the proposer of proposal 271, and I would like to add some comments for you to consider in your discussions. I made this proposal to reduce the escape mesh size in the Area J Kodiak fishery in order to increase the efficiency of harvest, and reduce handling and mortality of undersize Kodiak.

First, I would like to note that there is inconsistency across the regulatory areas. There are 3 areas where the escape size for Kodiak crab is 5.50": areas A and D (Southeast and Yakutat, respectively) and the Kodiak, Chignik, South Peninsula and Eastern Aleutian districts of area J. For areas A and D, the minimum escape mesh size is 7.00", and for those districts of area J it is 7.25". Why should the minimum escape mesh size be larger for Area J?

I have fished in the Kodiak Kodiak fishery for many years, since the early 1970s, and I also own and operate a business that buys and reworks crab pots here in Kodiak. In my experience the 7.25" escape mesh size is too large to allow for efficient harvest of Kodiak. Too many escape-size crab escape through it (I would say about 20-30%). This is why almost all participants in the fishery use the escape ring option; no one orders pots with the escape web panel option. The escape web option is inherently more efficient as it provides more escape surface area, and a higher percentage of undersize crab in the pot are able to escape, especially on longer soaks. In comparison, using escape rings leads to increased handling and mortality of undersize crab, and also decreases efficiency since crew have to spend more time sorting and returning undersize crab to the ocean.

So, what should the escape mesh size be? I would suggest that 6.75" would be the ideal size, which would still allow undersize crab to escape, but lower the escape rate of escape crab to an acceptable level. Also, I would note that the web does stretch to some extent when it is webbed in to the pots. I believe that this would result in more participants using escape web instead of the rings, which would result in decreased handling and mortality of undersize crab, and would increase harvest efficiency in the fishery. The 7.25" escape web size is just too large, and should be changed.

Thank you for your consideration.



Submitted By
Patrick P. Kus
Submitted On
2/10/2022 8:36:23 PM
Affiliation

Phone
907-539-2843
Email
p.kus@acsa.aska.net
Address
P.O. Box 2843
Kodiak, Alaska 99615

Comment from Patrick P. Kus

Kodiak

Re: Proposal 273

I am the proposer of proposal 273, and I would like to add some comments for the Board to consider in the deliberations. I made this proposal to allow for the opening of pots in the area Kodiak ground crab fishery in order to make it more economically viable.

As it currently stands, the area Kodiak ground crab fishery is not really economically viable. Requiring the use of single-set pots in such a deepwater fishery makes it difficult to prosecute efficiently, and there is a much higher likelihood of gear loss. This is why pot openings are permitted in the BSAI, and indeed there is a profitable ground crab fishery in those areas. So, why shouldn't pot openings be permitted for area Kodiak if there is enough quota to allow for it?

Further, if there is a concern that the quota in area Kodiak is just not large enough to allow for significant effort, there are mitigation provisions that could be used to limit participation and prevent overfishing. The most effective way would be to make the fishery super-exclusive, which would prevent the larger boats that fish in the BSAI from moving into area Kodiak. The advantages of such a provision would be two-fold: there would be less effort from larger-scale operations, thus slowing the fishery down, and a higher percentage of the participants would be local boats, which is appropriate in my opinion given the smaller quotas in area Kodiak. Also, the number of participants could be restricted by limiting the number of permits. And finally, a quota-based permit could be instituted. These are all established, effective tools that could be used to limit the fishery and allow the department to effectively manage it.

While the quota for ground crab in area Kodiak is currently very small in comparison to the BSAI, I believe the Board should allow for the fishery to grow if the quota does increase in the future. Kodiak crab is a valuable commodity, and the fishery has the potential to bring local economic benefit, providing local jobs and tax revenue. I would argue that using pot openings is really the only way to make this fishery practically viable. The Board could also consider a sunset clause in any act on they take if there is concern about any long-term impacts.

Thank you for your consideration.



February 15, 2022

Dear Board of Fish,

Don't even think about it!!!

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 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.

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.

Paul Carlson

Kenai
99611



Submitted By
Pau Homberg
Submitted On
3/10/2022 12:23:26 PM
Aff at on

Phone
907-232-4252
Ema
seakngpau@gmail.com
Address
2855 N. Lazy Mt. Dr.
Palmer, Alaska 99645

To the Board of Fisheries,

I have commercial fished in Area M a my life. I was born and raised in this area. I do not believe that the Board of Fisheries should have any meeting concerning Area M and Area L out of cycle. Any previous shut down of Area M or Kodiak has never benefited the Chignik fishery. There is historical data to back that up. ADF&G are experts in these fisheries and the board should take into account the respected opinion and recommendations. We see no reason for the BOF to address both areas in and out of cycle meeting.

Sincerely,
Pau Homberg

January 3, 2022

Paul Johnson
776 Chignik Road
Chignik, Alaska 99564

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

Subject: BOF Proposal 282

Dear Alaska Board of Fisheries,

I support Proposal 282, which asks that the Dolgoi Area and the Shumagin Islands salmon fisheries be curtailed from June 15 to July 31 when Chignik is not meeting escapement. The proposal is not about allocation, only resource conservation.

The Chignik early-sockeye run has not achieved minimum escapement for the last four years and yet, Area M fishermen have been permitted to harvest east-bound sockeye salmon through July without any requirement to share the burden of conservation. It is not right that the Shumagins and Dolgoi areas are permitted to operate without regard to the escapement status of Chignik sockeye salmon when it is known from WASSIP data that Chignik sockeye salmon are significantly harvested in the fisheries there from mid June through July.

In fairness, a pull-back in fishing time in the Shumagins and Dolgoi areas is reasonable when the mid-point of the Chignik early-run sockeye goal is not going to be met.

Most sincerely,

Paul Johnson

Area L commercial salmon fisherman





February 26, 2022

Dear Board of Fish,

I'm an Alaskan resident who resides in Anchorage and enjoys the fisheries available to residents from both a subsistence and recreational aspect. I do not target king salmon personally for subsistence or recreation due to the low returns. In regards to this proposition, it's hard to see how the Board can accept a proposition to reduce the king salmon escapement goals (which are already not being met) related to increased opportunity for commercial harvest of sockeye salmon. The currently approved escapement goals are supposedly based on the best available science, and the OEG is meant to improve the population. The proposition creates a contradiction between the idea that the established goals are based on the best available science above all else and the proposition to accept lower king salmon escapements goals, or meet minimum SEG, for commercial opportunity of sockeye salmon. Accepting the proposal implies there was incompetence or error in establishing the current escapement goals and it needs to be directly addressed as to when and to what nature the errors in evaluation of the best available science at the time resulted in the escapement of the current goals. Those who evaluated or misevaluated the data to establish the current goals need to identify their errors that justify further reduction in the escapement goals.

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.

In closing,

I appreciate the Board's attention to this issue. However, if the Board fails to acknowledge the king salmon's decline, and fails to vote down this measure in favor of commercial sockeye opportunity, there is little left to appreciate.

Paul Pribyl

Anchorage
99516



February 17, 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.

Paul Winn

Anchorage
99518



March 09, 2022

Dear Board of Fish,

We want salmon fishing on the Kenai Peninsula to be available for our grandchildren and their children and grandchildren.

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?

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.

Peggy Skaggs

Westcliffe
81252



February 27, 2022

Dear Board of Fish,

I live in Wasilla Alaska and have been fishing the kenai since the early 80s and have witnessed the up and down fishery for a long time, currently we're in a serious low abundance time period and believe it will continue for some time, the lack of 5 and 6 ocean fish should be at the highest of conservation, why would we even consider killing one, first and foremost conservation should be at the very top. Very sad day when there gone. Please do the right thing, build the stock back up, we're tired of not making escapement goals or hovering at the bottom of 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 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.

Pete Imhof

Chugiak
99567



Submitted By
Peter Hamre
Submitted On
3/11/2022 1:12:47 PM
Aff at on

I'd like to voice my opposition to Proposal 282, affecting changes to the salmon fishing schedule in the South Alaska Peninsula. There is a plethora of reasons that Proposal 282 is a bad idea.

1.) Back Lake salmon undergo rapid habitat degradation for salmon rearing, due to natural causes. Chignik Regional Aquaculture Association commissioned a report in 2006 that accurately predicted the eventual dwindling of salmon returns to that system, as a result from the lake filling in. That report also noted that during the 1975/1976 ocean regime shift, when other Gulf of Alaska sockeye systems experienced a two to three-fold increase in production, Back Lake only increased about 30%, because of the marginal nature of its habitat, and its shallow water. Now, as sockeye systems across the Gulf are declining, possibly due to climate change, the marginal habitat of Back Lake becomes more apparent. Chignik Regional Aquaculture Association even went so far as to consult with engineering firm CH2M Hill to try to address the problem, but they concluded that redirecting the water flow to the original channel would be prohibitively expensive. Chignik stakeholders have known about this problem for many years, and choose now to redirect the blame towards Area M fishermen.

2.) The WASSIP study concluded that areas of Area M that currently have scheduled fishing time intercept an extremely small amount of Chignik-bound sockeyes, usually in the low single digits. Mind you, this is back in 2006-2008, when Chignik was having strong runs - the intercept rate is almost certainly significantly lower now. The proposal would cut Area M's time less than half, for catching an imperceptible amount of Chignik fish.

3.) ADF&G is reevaluating the SEG for Chignik this coming year - this is an off-cycle proposal that is using data that will not be relevant next year. Any changes to the fishing schedule should be done in the normal board cycle, with the most current data available.

4.) The economic impact to the communities of King Cove, Sand Point, Cord Bay, and False Pass would be staggering. With the decline of Gulf of Alaska cod, fishermen are extremely reliant on salmon for the livelihood. As of 2020, 3,420 people live in the East Aleutians Borough, most of whom are Indigenous; that's more than 30 times the population of Chignik, and as such, the economic impacts of this proposal must be considered.

3015 112nd AVE. NE SUITE 150 BELLEVUE, WA 98004-8001 206.728.6000

March 11, 2022

Alaska Board of Fisheries
Märit Carlson-Van Dort, Chair
Via email dfg.bof.comments@alaska.gov

RE: Proposal 282: 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan and 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.

Dear Chairmen Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment on Proposal 282 put forth pursuant to the Alaska Board of Fisheries. **Peter Pan Seafood Co, LLC strongly opposes Proposal 282.**

Peter Pan Seafood is a long-standing processor of Alaska's seafood. We have a processing facility in King Cove as well as a fisherman support facility at Sand Point. We have been processing in the South Alaska Peninsula since 1911. Our operations are intricately tied to and supported by the communities in which we reside. The health of these communities and our industry is dependent on sound management that protects the health of Alaska's fishery resource.

Regarding Proposal 282, we believe that the Department currently has all of the tools it needs to manage the mixed-stock salmon fisheries potentially impacted by 282, and that the Department has utilized those regulatory tools professionally for many decades, as it did in 2018 and 2020 in attempt to protect Chignik runs. We ask the Board of Fish to acknowledge the Department's science-based management practices by taking no action regarding Proposal 282 at this time; and fully consider these fisheries in 2023, when Area M is scheduled as part of the regular Board cycle.

Area M mixed-stock fisheries have been among the most highly analyzed fisheries in Alaska for decades, and the conclusion of each new study is the same:

- Area M mixed-stock salmon fisheries do not create any adverse impact on those stocks
- There is no correlation between Black Lake escapement and the Shumagin Island fisheries.

Proposal 282 has remarkable economic impacts directly effecting the harvesting and processing sectors, as well as communities. Over 500 captains and crew are participating in the Area M mixed-stock commercial salmon fishery. All engaged in fishing are supporting the grocery stores, vessel support services, and restaurants in the communities. This activity is synonymous for all communities that benefit from Area M harvest. To reduce Area M fishing time that has already been approved through a public and transparent process would be detrimental to the communities and livelihoods of the individuals that rely on these fisheries.

Proposal 282 is an out-of-cycle allocative action. Please recognize the Department's professional, science based in-season management abilities and defer any action until you can fully consider these habitat and management issues, already scheduled for the 2023 cycle.

Sincerely,



Colby Boulton
Plant Manager
Peter Pan Seafood Co, LLC



Submitted By
Peter Schonberg
Submitted On
3/11/2022 8:34:08 PM
Affiliation
Area Managers

Dear Board of Fish Members:

I strongly object to proposal 282. I don't understand why this issue is being considered out of cycle as an ACR. The ADFG sockeye salmon forecast for 2022 shows harvestable surpluses for both the early and late run. The lack of a conservation concern takes away the urgency that would make this proposal valid as an ACR. Beyond this basic issue, the proposal does not address how reducing fishing time by half in two of the main area M fishing areas will solve the problem of weak Chignik sockeye runs. In fact, the best available science from the ADFG report shows that only a small number of Chignik sockeye are harvested in the Shumagins during June and July. A somewhat larger number have been taken in the past out of the Doggo area, but harvest caps put in place by the Board of Fish in the last few years are really tightening the catch of Chignik reds. Anyway you work the math, if one believes the science, the total number of Chignik reds taken in area M in a year are in the low ten thousands. Proposal 282 asks this Board to greatly damage the fishers and communities of area M to get half of these low ten thousands of fish to Chignik. I don't know the reasons for recent weak returns to Chignik, but implementing this proposal will not solve the problem and will cause great harm.

Thanks

Peter Schonberg



March 08, 2022

Dear Board of Fish,

I have lived in Alaska for 45 years. I worked for ADF&G and then USFWS. I began fishing in the Kenai River in 1978 when we had large numbers of king salmon. It is very disturbing to see how king numbers have declined. Proposal 283 is a horrendous idea. We need to do everything we can to conserve and protect king runs on the Kenai. Commercial fishers should not be fishing for them at all, and I would not be opposed to completely closing sport fishing for kings (including catch and release) until king numbers have recovered.

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.

Philip Brna

Anchorage
99507



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 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.

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.

Quyen Kay

Anchorage
99516

To: Chairwoman Marit Carlson-Vandort and Members of the Board,

I support Proposal 282. I bought a permit in 1991 and am now left with basically zero returns in a community falling apart from 4 years of failed runs on top of years of gradually diminished returns. The fishery in the lagoon has changed so much since then. It used to support most of the 90 or so boats in the lagoon sometimes but then in the late 90's management stopped opening all the area in the upper lagoon, and would only open it after the first 24 hours. This was a loss of traditional fishing area. Then the fishing openings were managed to achieve a smoother harvest for ease of processing as per governor direction and processor request.

In the late 80's the South Unimak June fishery area was expanded, adding area able to be fished along the mainland. In 2001, the GHL in the June Unimak/Shumagin fishery that kept the traditional harvest ratio of 5.8% South Unimak/1.5% Shumagins from shifting was removed and restrictive windows were implemented.

Historically the GHL was designed and implemented after the Board of Fish closed the June sockeye fishery in the South Peninsula in 1974, providing only small sockeye cap so that local chum could be pursued. This was because Bristol Bay was forecasted to have only a 200k sockeye harvest. It restrained the expansion of the fishery for almost 3 decades. In 2004 the window times were liberalized to be longer.

In 2004 it expanded the south Unimak fishable area farther east. All this undoubtedly expanded the South Peninsula opportunity to harvest Chignik sockeye. It was a gradual process spread over many decades. Since expanding the fishery into the Dolgor's the WASSIP study identified large catches of Chignik sockeye, both first and second run.

Back in Chignik in 2001, a heavy rain washed out part of the weir where escapement is enumerated. Large amounts of sockeye over escaped into the river. I have yet to document why the fishery was not open for harvest since escapement was met. Because of this event, the department decided to manage for the lower bounds of escapement goals in 2002. This practice went on until it was discontinued in 2014 or 2015. The practice of managing for lower escapement, while it did usually meet the lower escapement goals, shifted the number of salmon escaped in June (around the historical peak) lower by nearly 130k because escapement intervals were also adjusted later into July. This makes little sense as a natural defense strategy of salmon is to travel in large groups so predators encountered, only take a small percent of the whole. In the 80's the first run was managed so that 400k sockeye escaped past the weir by June 30th. This ensured the first run was met as few second run sockeye enter the system in June. 200k more sockeye were to escape by July 31st. These are mostly second run. Then 50k in August. September was bonus/extra.

As salmon returning from first run escapements that were displaced temporally and lowered in escapement overall, in Chignik, and while having a more challenging interception guntlet to pass through in the South Peninsula, the salmon became sparser in the lagoon. The big build-ups occurred less and less in the lagoon as the 2000's went on.





To make my boat and permit payments, it became more effective to search for sockeye out on the capes. I purchased the longer gear and fished the Lagoon less and less.

All this is to say that the sockeye runs in Chignik (and Chinoak, too) have everything going against them. The most the fish and game has done is to manage for the yield of zooplankton in Chignik Lake. They don't have other tools really and are bound by regulation, and the commissioners who have emergency authority would prefer new tools/regulations come through the Board process. One of the only tools that the Department of Fish and Game does fadjust is escapements. They even lowered the Chinoak escapements during the 2001-2002 BOF meeting from 1,450-2,700 spawners to 1,300-2,700 spawners. This action probably softened the appearance of impact generated by the extra days we would fish from smoothing out the harvest and lowered escapements. More days in a terminus fishery doesn't make for more fish like it does in an interception fishery.

Interestingly, not once over the years have I ever heard the Department suggest we could be experiencing even the slightest impact from interception. It would probably be considered an allocative thing to do so. But the impact in the South Pen can be seen when, over time, the Shumagin catches increase and Unimak catches decrease.

I think it should be more closely scrutinized that while the Bristol Bay stocks are mostly passed on to the North side by July 5th, there are still plentiful sockeye catches in the Shumagins. It was documented in 1990 that the seine fleet was so effective in the Shumagins that they were stopping the salmon from getting to the mainland. I believe this would have to apply to sockeye, too. Also in 1990, the fish and game who were much more protective of salmon stocks, thought the fishermen in the Shumagins had found a location to harvest Chignik sockeye. I grew up as a deck hand on my dad's boat backthen and believed that was just how the fish and game was. The department's mentality has shifted since then to one of basically procedural policy following.

All this is to say, there are all these things that can be reversed that will benefit Chignik salmon. Bristol Bay salmon not caught in the Shumagins still have to pass through Unimak. If they (sockeye) don't and are going East instead, then it's not a fishery on Bristol Bay stocks any longer.

I am aware some are going to suggest that there is a problem in Black Lake but any changes are stabilized since before 2012 as documented by the Army Corp of Engineers. And salmon if left to their devices, are resilient and adaptive. Unless and until it is documented as an environmental failure, every option used in the past anywhere Chignik salmon migrate should be employed. The excuse that there are too few salmon present anywhere to have a meaningful effect from preventing fishing mortality is false at best. Yes, it will take time to rebuild the runs but it took time to get here. Chignik salmon, the communities of Chignik, the fishermen and women invested here, all deserve (yes, deserve) to see the resource protected.

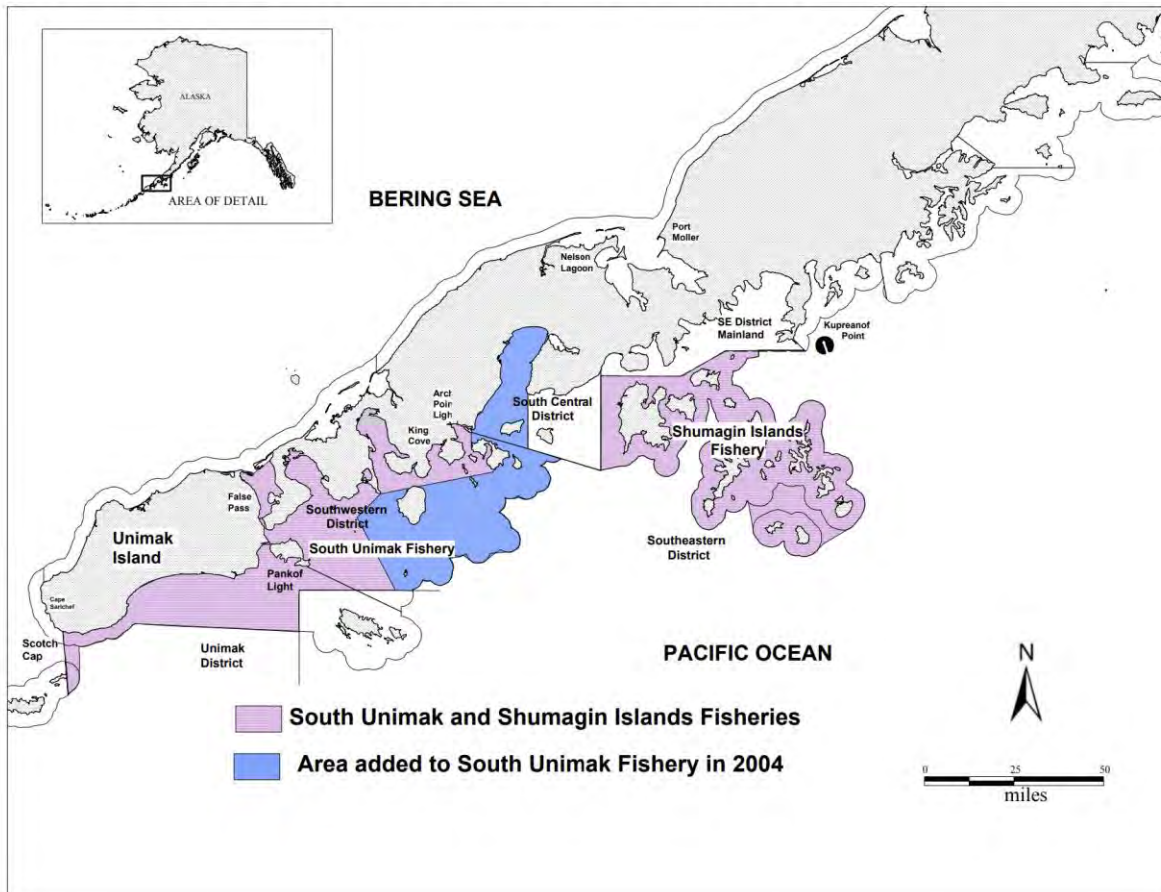
Please don't delay making every reasonable effort including passing Proposal 282. More solutions should be considered. This degradation of the run has been allowed for too long. Thank you. I will include supporting evidence and graphs post script.

Sincerely,

Rachel Allen

The area able to be fished since 2004 was expanded greatly towards SEDM and Chignik.

Appendix B3.—Map of the South Unimak and Shumagin Islands June fisheries with areas open to fishing defined.



2004 South Peninsula Annual Management Report, p.99

III. Problems with Current Plan.

In 2001, the board removed a longstanding sockeye salmon guideline harvest level (GHL) for the June fishery which equaled 8.3 percent of the total projected harvest of Bristol Bay sockeye each year; 6.5 percent was applied to the South Unimak fishery and 1.5 percent to the Shumagin Islands. The board also eliminated a chum cap that had been imposed on the June fishery, at various levels, since 1986. In place of the sockeye GHL and chum cap, the board established nine 16-hour open fishing periods (144 total hours), between June 10 and June 30 along with some other incidental prescriptions. The effect of this new management plan was a substantial reduction in sockeye salmon catches but not much reduction in chum salmon catches; the exact opposite of the long-standing June fishery management objectives of harvesting the historical percentage of sockeye while minimizing chum harvest.

Figure 2 Alaska Board of Fisheries, Findings on February 2004 Amendments... p.2, #2004-229-FB



A. Sockeye Salmon in the June Fishery.

Several small tagging studies have taken place at South Unimak and in the Shumagins, from 1925 through the 1960s, but the largest, most recent, and most comprehensive was a study conducted by the department and contractors in both locations during the 1987 season.

For that study, 5,442 sockeye salmon were tagged at South Unimak and 1,545 were tagged in the Shumagin Islands during June and very early July. Almost all tag recoveries occurred in the Bristol Bay, North Alaska Peninsula, South Alaska Peninsula, and Chignik areas. There were high rates of tag return reporting and good assessments of terminal runs (catch and escapement) for stocks where tags were recovered. Based upon reasonable estimates and assumptions of tag loss, fish mortality, and tag reporting, the study estimated the stock composition of sockeye salmon harvested in the two fishing areas: 84 percent of the sockeye salmon harvested at South Unimak sockeye were bound for various systems in Bristol Bay, while 54 percent of those caught in the Shumagin Islands were destined for Bristol Bay.

Figure 1 Alaska Board of Fisheries, Findings on February 2004 Amendments... p.2, #2004-229-FB

The GHL plan that was removed in 2001 was based on historical catch data that protected the various stocks being intercepted. The loss of the GHL has been detrimental to Chignik. Coincidentally, the Black Lake salmon (1:3's) returning from the first year of lowered escapement which will be discussed later (2002) would have returned in 2007, the 2nd year of the WASSIP study. The same applies for 2008. This affected the WASSIP data, lowering the % in 2007 and 2008.



Regulatory History

The South Unimak and Shumagin Islands June management strategy was decided on a year-by-year basis from 1972-1974 due to very low projected Bristol Bay sockeye salmon returns. In 1974, the South Unimak and Shumagin Islands fisheries were closed during June. In 1975, the BOF implemented an allocation plan where the South Unimak and Shumagin Islands June fisheries would be granted an annual guideline harvest level (GHL) based on the predicted Bristol Bay inshore sockeye salmon harvest. Based on historic catch data, 6.8% of the forecasted inshore Bristol Bay harvest was allocated to the South Unimak June fishery and 1.5% was allocated to the Shumagin Islands fishery. To reduce the possibility of overharvesting any segment of the Bristol Bay run, the GHL was apportioned to discrete time periods based on historical catch data. The distribution of the allocation by time period and percent was as follows:

<u>Time Periods</u>	<u>South Unimak</u>	<u>Shumagin Islands</u>
June 1 - 11	5%	9%
12 - 18	29%	28%
19 - 25	51%	41%
<u>26 - 30</u>	<u>15%</u>	<u>22%</u>
Total	100%	100%

If the guideline harvest for an individual time period was not reached, the unharvested portion was lost to the fishery. If the guideline harvest for an individual time period was exceeded, the overharvest was subtracted from the total season allocation.



Historical percentages of sockeye harvests between Unimak and the Shumagins was drastically altered in June. Effort shifted to the Shumagins in 2001 when the GHL was removed, however the effects of removing the GHL were masked by implementing restrictive fishing periods. In 2004, new liberal fishing periods were given virtually equally between the Unimak and the Shumagin June fisheries. The result of this has been a shift from the historic catch ratio that was applied when the GHL was created to a higher percent of the sockeye being caught in the Shumagins and closer to Chignik.

The following graph shows the shift in catch between areas over time and how June catches in the Shumagins have increased over time while they have decreased in the Unimak fishery. The effects of the GHL ending in 2001 and restrictive windows lifting in 2004 can be seen:

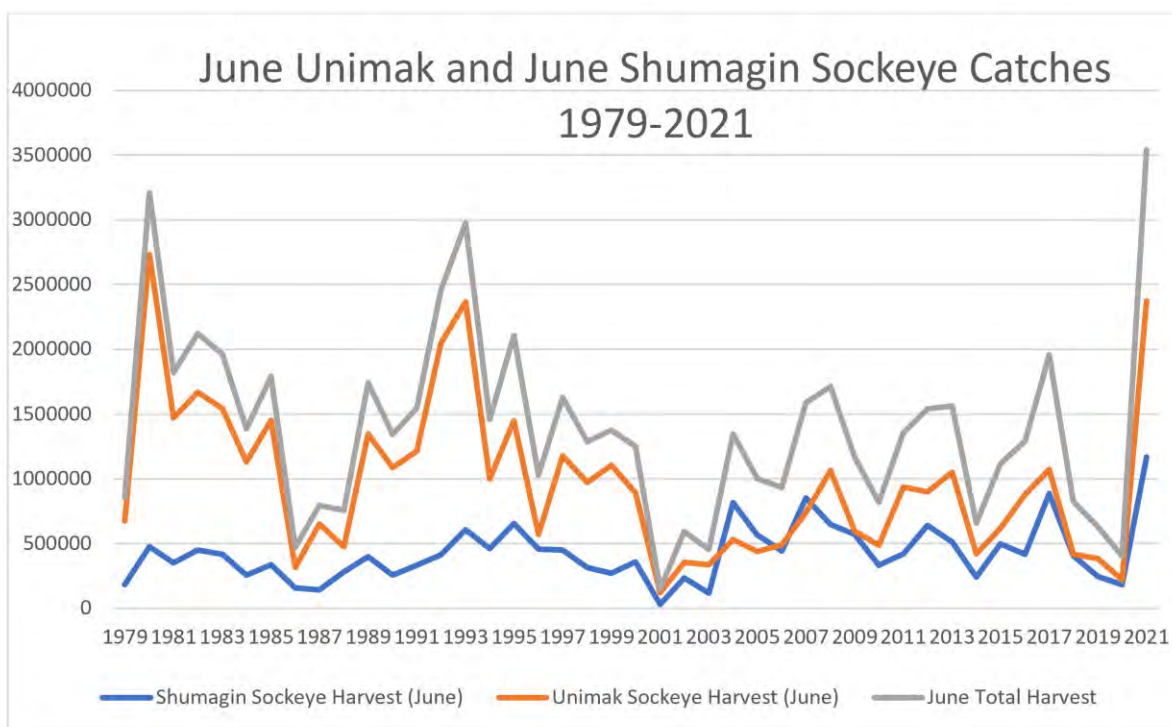
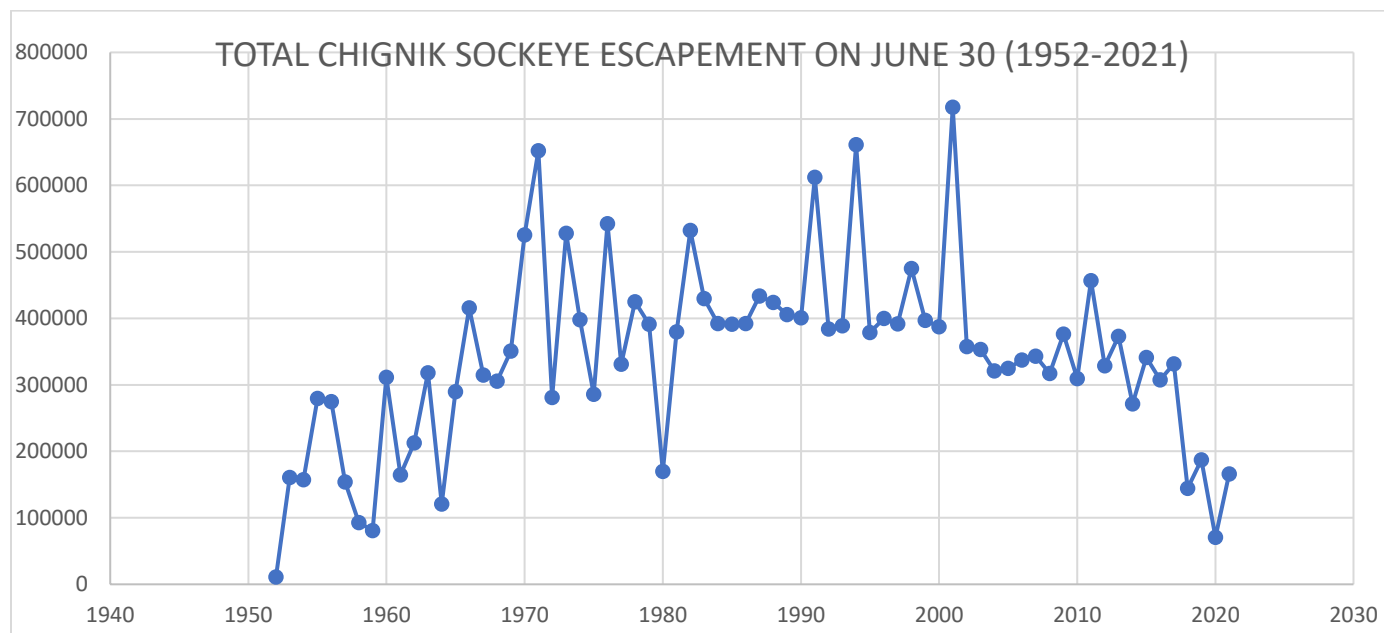


Figure 3 graph made from ADFG data



This graph shows that getting 400k escapement by June 30th provided for the healthy runs of the 80's and 90's and that less escapement in June corresponds with the poor fisheries of the 60's and 70's.



Above graph compiled from ADFG data.

The escapement over the years shows how management affects the returning salmon. Pre 80's were focused on rebuilding runs. Before that the effects of highseas interception from Korean and Japanese fleets were having effect.

The chart above also shows that less salmon after 2004 were getting into the river by June 30th when managing for low end escapement was practiced. Also, the escapement tables were changed so that the escapement was spread more evenly for the 1st run. Spreading evenly works well for buttering toast; not so much for salmon who prefer a peak timeframe, different for each distinct run.

The point I am trying to explain is that first run salmon are being collected through July now rather than 400k escapement by June 30th as was in the 80's. While some of those were second run, the vast majority were first run, thus assuring a solid escapement during the salmon's preferred timeframe.

With the first run being necessary to escapement in July now, it is important to protect these salmon as they pass through near interception fisheries even more.



1990
ALASKA PENINSULA-ALEUTIAN ISLANDS
GENERAL SALMON MANAGEMENT PLAN

SOUTH PENINSULA JULY - AUGUST

The 1990 pink salmon projected catch is 8 million fish. This is approximately 900,000 over the 1989 harvest of 7.1 million fish, and 1.2 million over the parent year (1988) harvest of 6.8 million. The 1980-89 average South Peninsula post June pink salmon harvest is 5,246,000.

The post June chum salmon harvest is projected to be approximately 700,000 fish which is over the 1989 harvest of 538,000 but well under the 1980-89 average of 1,060,000.

During 1980 a much larger than normal number of purse seiners caught record numbers of pink salmon in the Shumagin Islands. It became apparent that the purse seine fleet was effectively preventing the salmon from reaching their terminal locations and the runs were only mediocre east of Volcano Bay. Due to the fact that there is often considerable variation in the strength of runs going to different geographical locations, the amount of purse seine gear in the Shumagins will definitely be a factor in determining the amount of fishing time allowed in the Shumagins as compared to mainland terminal harvest areas.

It is speculated that large numbers of Chignik sockeye may be intercepted during July in portions of the Shumagin Islands Section. These locations do not have a documented history of substantial fishing effort until recently. The locations in question are:

- (1) The west side of Unga Island located between Bay Point and Archedin Point.
- (2) The portion of the Shumagin Islands Section located south of 55° N. lat. (which includes Mountain Point on Nagai Island).



in Chignik Lake into Black Lake and Chignik Lake origins. There appears to be a rough correlation between Chignik spawner abundance and Chignik yearling progeny index. Indices for the last three year classes (1968-1970) tend to be low.

Growth of Juvenile Sockeye and Interaction with Potentially
Competing Resident Species

Parr (1972) presented a detailed analysis of abundance, growth and food habit studies of juvenile sockeye, threespine and ninespine sticklebacks, and pond smelt in Chignik and Black Lakes based on extensive analyses of samples of fish and plankton collected in 1968, 1969, and 1970. Only a brief discussion of the objectives and results of this M.S. thesis study will be presented here since copies of the thesis were forwarded previously. Additional data collected in 1970 and 1971 will be presented in tabular form.

By the 1960's the runs of sockeye salmon to the Chignik system had declined considerably since 1940. Fisheries Research Institute studies of the factors causing the decline have been reported previously by Narver (1966), Dahlberg (1968) and Burgner et al. (1972). The primary conclusions of these studies were that the carrying capacity of the nursery areas of the two lakes is the primary limiting factor in sockeye salmon production and that previous allocations of parent spawning escapements were responsible for underutilization of the Black Lake nursery areas and overutilization of the Chignik Lake nursery area. This was believed to have resulted in an increase in the abundance of resident species in Black Lake which could compete with the juvenile sockeye for food and space.

Narver (1966) and Dahlberg (1968) estimated the optimum spawning escapements to Black and Chignik Lakes which now serve as the target escapements under the present State of Alaska fishery management policy. The early segment of the run, going to Black Lake, is now regulated for higher spawning escapement, and the later segment to Chignik Lake, for lower escapement. The Institute study reported by Parr (1972) was undertaken to gain direct evidence as to whether the present policy is having the desired effect, that is, (1) to increase the abundance of juvenile sockeye in Black Lake, (2) to suppress the competitor species, and (3) rebuild the runs to pre-1940 levels. Parr's study focused on the following objectives: (1) to compare the food, abundance and growth rate of juvenile sockeye salmon, threespine and ninespine stickleback, and pond smelt which are potential competitors for food in the Chignik Lakes, (2) to determine what relationships (if any) exist between abundance, growth rate, and food habits, (3) to determine whether competition for food exists between and within the fish species, and (4) to assess the effects of competition for food on the growth rate of the sockeye salmon in the limnetic areas of the two lakes.

The objectives of the study were based on the hypothesis that an observable effect of competition should exist if competition is intense. If interspecific competition exists, a negative relationship may occur between abundance



2002 SOCKEYE SALMON MANAGEMENT

Chignik Lagoon Regulatory Markers

In 1996, the Governor and local processors requested changes in management strategies to help enhance product quality. In response, Chignik ADF&G management staff modified the management strategy to help alleviate some of the quality problems in the Chignik Lagoon and provide for an even flow of escapement. During most of 1996 - 2001, the department implemented the following schedule for the Chignik Bay District openings: 1) initial openings were only allowed north of a line drawn from Humes Point to the Chignik Island markers and 2) after 24 hours the fishery was opened to the Mensis Point markers, which is located in the mouth of the Chignik River. This management action seems to have improved quality because processors have indicated an overall increase in the quality of delivered fish. Quality likely improved because salmon holding between Humes and Mensis Points were given an extra day to migrate upriver and escape the fishery. As warranted during the 2002 salmon season, opening and closing the waters between the Humes and Mensis Points markers will continue to be utilized as a management tool.

The June and Early July Fishery

ADF&G intends to give the fleet advance notice prior to any impending fishery by news releases. By regulation, the first commercial fishing period can occur on June 1. However, since 1982, the first fishery usually occurs after June 11. Prior to the first commercial salmon fishing period, the following requirements must be met:

- 1) a minimum escapement of 40,000 sockeye salmon through the weir by June 12, and
- 2) a strong buildup of salmon in Chignik Lagoon must be present as indicated by the ADF&G test fishing program.

Subsequent openings will be determined from several factors including commercial catches, test fishing results, and meeting established interim escapement goals (Table 1). During June, commercial salmon fishing will be allowed only in the Chignik Bay, Central, and Eastern Districts. Commercial salmon fishing, as described by the Chignik Area Salmon Management



March 03, 2022

Dear Board of Fish,

Our family has been fishing the Kenai river for over 30 years. The king return has dwindled this whole period. Commercial fishing must cease or be heavily restricted. This includes the cook inlet commercial fishing the commercial fishing in river, the river guides. Lowering the escapement is such a joke. Lower the escapement and yay you meet your goal with the commercial fishing all season. Sport fishers are allowed to keep 2 kings out of the Kenai river. Professional guides can have 4 to 8 new clients each take 0 to 8 king out of the river each day after the commercial fishers take their hundreds if not thousand of returning kings. No river can handle this pressure. I you want all the craziness to continue you have to enhance this 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.

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 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.

randy bowen

kenai
78230



February 15, 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.

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 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?

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.

RAY RHASH

Tavernier
33070



February 15, 2022

Dear Board of Fish,

We live on the Kenai and hope that someday we will have strengthened the Kenai King run so our grandkids can fish the Kenai river. This will not happen if you passing 283. Please do not be fickle, give into pressure and reduce the numbers until escapement numbers do actually increase.

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.

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.

Rebecca Branson

Soldotna
99669



March 08, 2022

Dear Board of Fish,

Please vote no on Proposal 283, and maintain the Late Run King Salmon Management Plan in its current form.

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.

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.

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.

Rebecca O'Hara

Anchorage
99516



February 15, 2022

Dear Board of Fish,

As a Soldotna resident and Kenai River angler, I would be very upset to see management going the wrong direction in protecting Alaskan king salmon. Please say no to 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.

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?

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.

Reed Morrison-Plachta

Soldotna
99669



February 16, 2022

Dear Board of Fish,

The current management plan was put into place for a reason, King Salmon Conservation. Stick with the current plan.

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 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.

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.

Reuben Hanke

Soldotna
99999



Submitted By
Reuben Payne
Submitted On
2/15/2022 11:55:53 AM
Aff at on

Please take a few minutes to think about the king fishing in 1986 compared to today. If you weren't here in '86 think about '96. Not here...OK think about how king fishing on the Kenai Peninsula or anywhere statewide was during the early 2,000s. Ok, lets look at 10 years ago. The time to raise expectations is now...not over escapement goals. If you don't care about sport fishermen, fine... if you don't care about set netters, that's ok also. If you could care less about d netters, drifters, or tourist...no problem.....please just care about the fish...they don't need you to lower the goal...they need you to raise the goal. I've guided for 30 years here and hate to see my business struggle with no kings....but I also have three sons that live here on the river and I hate to even think that they might never catch another king. Do the right thing.....



March 01, 2022

Dear Board of Fish,

No on 283. Save our salmon heritage

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.

Rex Maurer

Hobart
98025



February 20, 2022

Dear Board of Fish,

Please protect our king salmon. Accidental catch is still catch and taking them out of our rivers. Look out for all people of Alaska and the USA. Not just the commercial fishermen.

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.

Rhonda Schwartz

Brainerd
56401



March 07, 2022

Dear Board of Fish,

Live in North Carolina and have enjoyed coming to Alaska to peruse salmon and halibut. I have noticed over the 20 years a decline in king salmon fishing. It would be disappointing to allow more salmon to be harvested.

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.

Rich Brannin

Wilmington
28409



February 15, 2022

Dear Board of Fish,

I have been spending thousands of dollars every year in Alaska to enjoy your fishing. Last year King Salmon closed the day I arrived. This proposition is a death sentence to your tourism and your citizens that depend on the income. There are other destinations in the world that welcome fishermen and responsibly manage their resources. Vote NO.

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.

Rich Calcut
35803



February 18, 2022

Dear Board of Fish,

I was born in Alaska and lived along the Kenai River for many years. I used to be able to catch kings from my dock....boy have things changed. I haven't fished for kings from my dock or my boat since 2008.

We need to keep paired restrictions in place. It makes no sense to allow the nets in the water when we are not meeting our escapement goals.

Passing Proposal 283 prioritizes a small group of commercial fishers 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 towards lightening 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.

RICHARD BUCY

kenai
99611



February 15, 2022

Dear Board of Fish,

I am a retired Alaskan. I have watched through the years as returns on king salmon have gotten lower and lower along with the size of these beautiful fish get smaller.

Reducing the escapement goal because it is not being met is lunacy. It's like Congress raising the debt ceiling because they overspend year on year. Doing so makes this goal meaningless. You might as well eliminate it and have a free for all and let all user groups take at will.

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.

Richard Davis

Soldotna
99669



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.

Richard Erkeneff

Soldotna
99669



February 24, 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.

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.

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.

Richard Jameson

Anchorage
99516



March 05, 2022

Dear Board of Fish,

We live on the Kenai River and fish on the lower river. Since moving here about 20 years ago the king salmon run has declined to a point we need to better manage this problem and focus on the future king runs. The escapement goal is too low now and we see no improvement.

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.

Richard Larson

Kenai
99611



Submitted By
Richard McGahan
Submitted On
2/22/2022 9:38:46 AM
Affiliation
Cook Inlet Set Netter

Phone
907 252 1134
Email
bouderpont@alaska.net
Address
54025 Kena Spur Hwy
Kena, Alaska 99611

IN FAVOR: Proposal 283

I am a 67 year resident of N. K. Sk. I fished on Saamatof Beach my first summer here in 1955, when my Dad drove truck picking up fish for McNeely, L. L. and McNeely. Since then I have been a drifter also, and am now back fishing the same beach with my wife, daughter, son-in-law, and grandchildren. During that time we have poor runs and good runs. We are used to having fishing restrictions during poor runs and are in agreement with that. But with the current regulations, we sit on the beach with our nets piled on the sand and watch over a million fish escape into the river. This is where the drifters fish, the sports fishermen fish, and the deep netters by the thousands, deep fish. We fish for sockeyes. The current regulations and "partial restrictions" are punitive, unscientific, unequitable and inappropriate. If the biologicals are correct, the future runs will show the lack of foresight due to the consistent over-escapement of the last few years. This proposal gives us a chance to fish when there is a great run like last year. As a result, the runs have been late. We need the biologicals to have some latitude.



February 22, 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.

Richard Miller

Waconia
55387



February 15, 2022

Dear Board of Fish,

I live (40+ years) and fish in southwest Florida routinely. The stock of snook, redfish and speckled trout were severely depleted, resulting in catch and release only for the past several years. The stocks have begun to rebound. We fished the Kenai almost every year and have done so since 2005. We refuse to harvest another king salmon due to the low escapement.. Florida stood firm on their position of catch and release only and all users have benefited from the years long closures. I hope you do the same.

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.

Richard Mohaupt

Punta Gorda
33950



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.

Richard Nachazel
5515



February 17, 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.

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.

Richard Nachazel

Johns Creek
30005



Submitted By
Richard Person
Submitted On
3/11/2022 2:18:05 PM
Affiliation
Commercial Fisheries

I have participated in the PWS Commercial Sport Shrimp Fisheries since its reopening 2010. In general, I am satisfied with the prosecution of the fishery, but believe there is room for some changes in the management plan.

Currently, the entire burden of conservation is placed on the commercial fishing participants who catch the smallest share, i.e. 40% of the TAH.

In every fishery I am familiar with, the BOF has endeavored to spread the burden of conservation out evenly among all participants. Why should PWS shrimp be different?

As written, the PWS shrimp management plan causes the Commercial fishery to have a harvestable surplus of 110,000 lbs, while allowing the sport fishery to continue as normal.

Proposals 240, 242, and 246 seek to rectify this in different ways.

I would like to support Proposal 240 as the best method for correcting this imbalance. It presents a scaled-down harvest for the commercial fishery in times of low abundance.

I strongly oppose Proposals 247, 250, and 252.

The stated goal of these proposals is to "speed up" the fishery, presumably so some fishermen can move on to other fisheries that start in May.

Longer slower fishery benefits both management and markets.

Thank you for your time and consideration.



March 05, 2022

Dear Board of Fish,

Have been fishing Kenai River and Cook Inlet since 1992. Built summer home in 2007 on Keystone Dr. I typically don't fish kings, but one of my most memorable mornings was when my wife and I along with two others limited out in less than 2 hours fishing with a guide in the Meadows. I released a 20 lb king. Net 53, 52, 35 & 26. My wife hooked up w/i 5-10 min. for the 52. Of course, I had the small one, but could brag that I caught the most. It seems to me there were 1500 kings enter the River that morning. (7/14/2004). Seems everybody around us was hooking up. We don't have days like that anymore.

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.

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.

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.

Richard Poe

Winter Haven
33884



February 18, 2022

Dear Board of Fish,

I like to visit AK and fish. We live in NC and have been to Kenai peninsula several times.

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.

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.

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.

Richard Schulz

Grifton
28530



March 01, 2022

Dear Board of Fish,

As an Almost 70 year Alaskan I have fished countless rivers and the Kenai is a treasure we need to protect.

Please do not sacrifice the future for an immediate economic gain.

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.

Rick Nerland

Anchorage
99501



February 26, 2022

Dear Board of Fish,

Im a retired Sport Fishing deck hand. Its important to protect the Kenai River kings now. I spend almost every day on either the Kenai or Kasilof during the fishing season. Sport fishermen should have an equal voice in fishing regulation.

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.

Rick Rector

Kenai
99611



February 16, 2022

Dear Board of Fish,

We have let the commercial fleet kill to many kings for years. It is time to state our ground and say enough is enough. Vote no.

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.

Rick Willis

Anchorage
99507