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March 11, 2022

Dear Board of Fish,

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

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

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

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

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.

Brant Oliver



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February 17, 2022

Dear Board of Fish,

Hi, I have grown up in Anchorage Alaska and have been fishing the Kenai river and most all the rivers on the peninsula for almost 40 years now. The Kenai holds one of the most diverse and special fishable ecosystems in the world, but you should all know this by now. I am a firm believer that if we lower the escapement goal for any fish species returning to a river system that already suffers from historically low return numbers we are going in the wrong direction. It does not matter WHAT is leading to the low return numbers, allowing more boats, nets, and rods to keep taking more and more year after year is what will eventually lead to a complete shutdown of the fishery. I know for a fact that some of the members on the Board of fisheries don't understand this even though they have more at stake with their own commercial fishing endeavors, because if they did they would see the writing on the wall and sell off anything they have invested in commercial fishing and retire before they are forced to retire. If there is to be a future for the Kings of the Kenai and the rest of south central Alaska we MUST raise the escapement numbers across the region and limit commercial catch and by-catch even if it means shutting down the King fishery for a few years.

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 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.

Brent Bartholomew

Anchorage  
99507



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February 16, 2022

Dear Board of Fish,

I am firmly opposed to proposition 283 as I feel the King run on the Kenai is and has been in serious trouble for many years, as a Alaskan Fishing guide I have gone as far as completely stopping all fishing for Kong's including Catch and release because of this period of lie abundance. Although I realize most wont take the drastic step that I have to help save the King Salmon I encourage you to take the most conservative approach possible when setting the upcoming seasons and please keep in mind the generations of future fishermen and women who would like an opportunity in the future to be able to again fish for these magnificent creatures once this period of low abundance has passed by us. thanks for your consideration Capt. Brent Bauer

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.

Brent Bauer

Vancouver  
98682



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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.

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Brett Coffman

sterling  
99669





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February 23, 2022

Dear Board of Fish,

Been fishing the Kenai river since 1994. It's a shame to see what has happened to the king salmon run. No the once plentiful Kenai king salmon is just about gone. Need more restrictions on commercial and sport to bring it back

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.

Brett Gianella

West Linn  
97068



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February 24, 2022

Dear Board of Fish,

60 plus year Alaska resident who who would like to help rebuild the Kenai River King Salmon by limiting both commercial and sport fisheries ability to retain kings until numbers are sustained

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.

Brett Muller

Anchorage  
99517



Submitted By  
Brett Roth  
Submitted On  
3/11/2022 5:30:40 PM  
Affiliation  
Fisherman

March 9th 2022

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Comments Submitted By:

Brett Roth

PWS Commercial and Noncommercial Shrimper, Sablefish and Halibut Commercial Fisher

7810 Casey Cir

Anchorage, AK. 99507

2022 BOF Comments

## Background

I greatly appreciate the opportunity to comment and will be focusing on several proposals in my comments and why I personally am very against two of them and think several others could improve the fishery. I will also explain how myself, and a large number of other PWS commercial shrimpers prosecute this fishery for the benefit of families and our customers- the local lovers of this incredible resource. I regret that I will not be attending the meeting until March 28th, I had a trip planned before the meeting date changed. If a hybrid call-in option is available I will use it. I understand the difficulties the Board has dealt with scheduling meetings of over the past few years and appreciate their commitment to the public process.

In my 2018 comments to the board I wrote *"Fundamentally, I am committed to three things: more research, erring on the side of conservation in management of the fishery and a longer commercial season for the benefit of customers desiring fresh product and fishers who are trying to develop a business in a tough open access fishery."* Five years later, nothing has changed regarding my fundamental goals.

In 2018 I also commented that *"I, and others like me, utilize the fishery in a way different from most fisheries in Alaska in that we are not only fishermen but also direct marketing operations*

*(catcher-sellers) that provide the public with incredibly fresh, often same day, direct from the*

*fishermen seafood that would be the envy of white-table cloth chefs worldwide."* This also has not changed, and if anything as interest in the fishery grows and seasons contract it is getting more difficult to do. I also wrote that *"I respect my fellowfishers desire to diversify but I recognize the typical model is to catch as much fish as quickly as possible and that is not the optimal model for a spot prawn fishery."* and *"Different fishers will always have different priorities and I would prioritize this fishery as having the opportunity to develop in a way that allows more Alaskans to enjoy these incredible shrimp and for them to permeate more deeply into our culinary culture. We have one of the world's greatest foods here and to catch it quickly and freeze it is a missed opportunity."*

I know I have been quoting myself, but I want to emphasize that as I've developed this business since starting in the fishery in 2014 my experience of this fishery being a unique opportunity for direct marketers to provide happiness and joy for the everyday Alaskan customers have been consistent and, if anything, have only grown stronger. In a given year we will sell prawns to 50 to 100 different individuals, typically in small quantities.

PWS Spot Prawns fishers can flourish with an economic model that differs from many other commercial fisheries in that a longer season with more fresh product can be very beneficial to boats and the consumer. While small boat commercial fishers are familiar with this dynamic of higher prices and happy fresh fish consumers since the implementation of IFQ's for Halibut and Sablefish for example, the direct relationship between catcher and seller in the PWS shrimp fishery is a different in that the resource is typically consumed locally and a strong relationship is formed between harvester and consumer. In fact, what perhaps has changed since 2014 is we see this business



model taking hold more and more with fishermen direct marketing their own salmon, halibut, blackcod etc. online- often a frozen and beautifully prepared product. The PWS spot prawn fishery is well managed, unique and has a huge amount of participation and interest for a fishery of its size- all things the board should be aware of and respect. These are the best shrimp in the world and fishermen have a supply problem, not a demand one.

Finally, in 2018 I was involved in authoring two proposals, proposal 218 and 219 which proposed moving the start date of the Shrimp fisheries back to May 1st as well as shortening the back end of the season, having it end by August 15th. I supported these in part because I was (and am) concerned with the harvest of egg bearing shrimp at the beginning and end of the season in our fishery. I did not submit similar proposals this year but two proposals in particular have caught my attention and have me "playing defense" so to speak.

### Proposal 250

Proposal 250 suggests moving the season start date to March. I am opposed to this proposal. When the 2018 proposals were made to move the start date to May 1st it was commented that it would be allocative, at a minimum this proposal is also allocative but that is not the main reason I think the board should reject it. An earlier start date would result in even larger harvest of egg bearing shrimp which could have negative consequences for the stock and therefore is far too risky biologically even if the board were to see the allocation change as a benefit. For the record, I and many others with significant time in the fishery would be negatively impacted by the allocative aspects of this proposal and certainly do not see that as a benefit. On the issue of spawner shrimp, in a personal communication with me in 2018, Laurie Convey, from Canada DFO in BC which prosecutes the largest commercial spot prawn fishery in the world shared that they do not start their season any earlier than May 1st specifically to AVOID potential harvest of egg bearing females and allow for improved growth and value of the shrimp prior to harvest. Of note, they are permitted by regulation to open much earlier than May 1st and this is a management decision, however I think this proposal as written would put the department in a box where they would almost have to open too early. Also, back in AK, during the 2018 BOF cycle there was a proposal in the Southeast and Yakutat Shellfish meeting, proposal #79 that suggested moving the October 1st start date of the Southeast AK Spot Prawn fishery to "an unspecified date in April" in order to avoid egg bearing females and better use survey data in the management of the fishery. What I found very interesting though was the department comments from the SE managers which not only **supported** the concept but also **"recommends that the board consider an opening date of May 15 in order to maximize potential benefits"**. I'm sure there are other biological benefits to moving the start date to May, and the eggged shrimp that we are catching during this time carry larvae that are very developed and eyes can be clearly seen on the eggs. The earlier start date is allocative against fishers that are long time participants in the fishery, have developed early summer markets, have developed their business plans around the current model but also has very real biological concerns. The board should reject proposal 250.

### Proposal 247

Proposal 247 seeks to set a minimum limit of pots in the fishery of 50. The department opposes this proposal because "the current limit of 100 pots or fewer allows fishery managers to target the GHL closely and provide maximum opportunity due to a controlled harvest rate that extends the season. I concur with the department and would add on their final point that a controlled harvest rate that extends the season benefits many fishers and local consumers engaged in direct sales of fresh shrimp. This proposal is designed to create a rapidly prosecuted season which results in shrimp going to freezers and only benefits certain types of operations, which largely are not the type of operations currently engaged in this unique fishery. Finally, this would have a negative impact on Alaskan consumers who depend on their relationship with individual fishermen to source this incredible shrimp and benefit from a season of a longer duration. While individual Alaskans could purchase frozen shrimp I do not think they would be the target market for as much of the harvest as they currently are. The board should reject proposal 247 because it hamstrings our excellent management and could make targeting the GHL more difficult, will exacerbate a race for fish in a fishery that benefits most from high quality fresh product and will have a negative impact on Alaskan consumers.

### Proposal 246

This proposal seeks to eliminate the TAH threshold of 110,000 pounds for there to be a commercial fishery. I support this proposal, not because having a limit isn't a good idea but because the current limit is highly allocative against commercial users. The current limit of 110,000 *surplus* pounds in order to have a commercial fishery may be too conservative generally. It is particularly problematic that the majority user, noncommercial, is prosecuting a fishery below the 110,000 pound threshold reducing any potential conservation benefits of this threshold. I'll add that there are other proposals, most notably 240, that could achieve similar benefits possibly in a more comprehensive manner.

Personally, I think prosecuting a commercial fishery and a noncommercial fishery during times of low abundance should be done very cautiously and with significantly reduced harvest or at times no harvest at all to allow for rebuilding. However, below 110,000 pounds I'd hope there is still room for both groups to have some equitable harvest opportunity and think that the data provided by the commercial fishery in particular would be helpful to managers in determining stock trends and health because the logbook data is geographically and temporally specific, longitudinal and robust. Losing the annual collection of this logbook data unnecessarily during a time of lower abundance is a concern and should only happen if there is a serious stock concern. Were to be at a level where we are concerned with that concerned with the stock then the elimination of harvest effort opportunity should not be born solely by commercial fishers.

It is important to remember that the commercial fishery benefits many Alaskans that enjoy shrimp and can only access it through our local fishermen. The board should not ignore the potential data collection benefits of removing this restriction and should create a situation where conservative harvest can continue to occur by all users in a way that allows to markets that have been developed to stay connected to the fishery and everyone to participate. The benefits to Alaskans are real and the department can and will manage conservatively even without this conservative guideline. At a minimum the allocative aspect of this guideline needs to be addressed.



## Proposal's 244 and 245

These proposals modify the harvest based on the previous year's harvest. The board may have an opportunity to try and seed something interesting here and it is worth a look. I'd suggest the Board think about what is done in the IFQ halibut and sablefish fisheries as well as how Canada uses similar provisions in their noncommercial halibut fisheries allowing them to liberalize effort when they are targeting their GHL with the knowledge that going over the GHL has consequences in the following year. In fact, Canada is considering a 3 fish halibut daily limit in their noncommercial fisheries this year in part based on this approach. These proposals could generate opportunity for Alaskans while still erring towards conservation. The board should consider them and the more important part of the proposal in my eyes is the part that deals with "overages" as opposed to the "underages" since the underages are not a conservation concern.



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March 07, 2022

Dear Board of Fish,

I live in Coeur d' Alene, Idaho. I've always wanted to fish the Kenai River for big kings. Unfortunately, the numbers have been so low that I haven't made it a priority. I would love to see the numbers increase and live out my dream of reeling in a big king on the Kenai!

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.

Brian Baker

Coeur d' Alene  
83815



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March 08, 2022

Dear Board of Fish,

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

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

Brian Bouthiller

Peachtree City  
30269



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March 11, 2022

Dear Board of Fish,

Im a 51 year old sport fisherman from Phoenix. Ive been fishing the Kenai since 2006. We have progressively watched the most incredible king salmon fishery degrade in to a shadow of its past. This fishery means so much to those of us that have experienced what it can be. Please, for once make the sound economic and biological choice not to pass 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 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?

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

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Brian Bowers

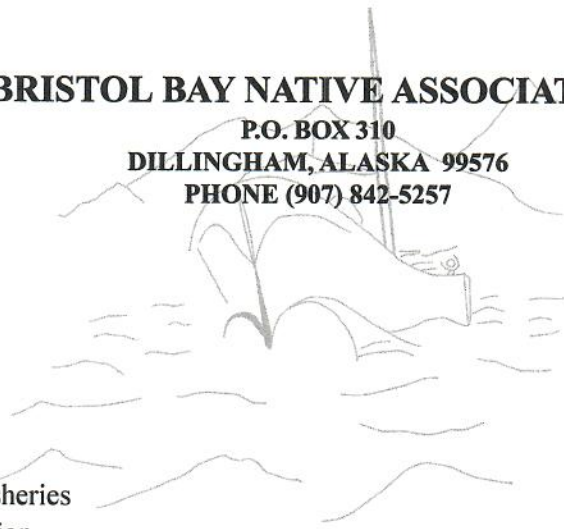
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85260





# BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310  
DILLINGHAM, ALASKA 99576  
PHONE (907) 842-5257



Tribal Councils  
Served by BBNA:

- Aleknagik
- Chignik Bay
- Chignik Lagoon
- Chignik Lake
- Clarks Point
- Curyung
- Egegik
- Ekuk
- Ekwok
- Igiugig
- Iliamna
- Ivanof Bay
- Kanatak
- King Salmon
- Kokhanok
- Koliganek
- Levelock
- Manokotak
- Naknek
- New Stuyahok
- Newhalen
- Nondalton
- Pedro Bay
- Perryville
- Pilot Point
- Port Heiden
- Portage Creek
- South Naknek
- Togiak
- Twin Hills
- Ugashik

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

March 10, 2022

Subject: Letter of Support for Proposal 282

Dear Chairman Burnett and Board Members,

The Bristol Bay Native Association (BBNA) strongly supports the purpose of Proposal 282, which would reduce the opening periods in the South Unimak and Shumagin Islands fisheries to protect the Chignik salmon returns. BBNA is the regional non-profit Alaska Native organization for the Bristol Bay Region, of which the five Chignik-area villages are a part.

Exceptionally low returns of Chignik sockeye from 2018 to 2021 have prompted state and federal managers to restrict commercial fishing and even subsistence harvests in the Chignik waters. While these restrictions have largely been supported by the communities and stakeholders as necessary for conserving the runs, additional action is required. The conservation burden should not fall exclusively on the Chignik communities when their sockeyes are still being harvested elsewhere.

Fishermen in the area have been adaptive to changes in resource abundance and marketability. Notable changes have been the development and subsequent closures of King, Dungeness and Tanner Crab, shrimp, and herring fisheries. While the opportunity to participate in these other fisheries locally is no longer available, the sockeye salmon fishery remains the staple that ties the subsistence and market economies together. It is also at the core of maintaining cultural, familial, and community well-being.

At this time, ADF&G simply must provide additional protection for Chignik sockeye in their migration corridor. Proposal 282 will do that while maintaining a balanced burden of conservation and the potential for commercial harvests in both fisheries. We realize there may be some wordsmithing of the proposal in the board process, but we strongly support the concept of



reducing the opening periods in the South Unimak and Shumagin Islands fisheries until the mid-point of the Chignik escapement is reached or there are commercial openings in the Chignik fishery.

Sincerely,

BRISTOL BAY NATIVE ASSOCIATION

A handwritten signature in blue ink that reads "Bruce Baltar".

Bruce Baltar

Acting President & Chief Executive Officer



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February 26, 2022

Dear Board of Fish,

I guided the Kenai River between 2002 and 2016. There was a significant decline in both early and late runs during this period. I fault State of Alaska for failure to buyout the set nets surrounding the river mouth and not setting larger non gill net zones to prevent annihilation that allow so much overfishing of these King Salmon. Time for all parties to share in the rebuild of these unique King Salmon. I am against 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 OEG is the OEG for a reason. The escapement threshold was set because that is the minimum number of salmon that need to enter the river so that the fishery can rebuild. I am not willing to give up on the Kenai River king salmon. Please vote no on Proposal 283.

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

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.

Bruce Hewitt

Burbank  
99323



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March 07, 2022

Dear Board of Fish,

I live in Utah and come to the Kenai often to fish for red and king salmon. Over the years I have seen a drastic decline in the number of king salmon making the trip back to their spawning beds in this great river. Commercial fishing, not the small number of sport fishermen are the cause. Please stop further decline in this fishery by NOT passing prop 283.

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

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

Bruce Jolley

Orem  
84058



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March 09, 2022

Dear Board of Fish,

I'm a 40 year Alaska Resident and moved to Alaska after fishing the Kenai as a 25 year old guest to the state. Nothing is more dear to me than this river and it's existence. I'm crushed by the past decisions to ignore our king salmon at the expense of a commercial industry. We all need equal skin in this game to succeed.

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.

Bruce Morgan

Anchorage  
99507



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February 17, 2022

Dear Board of Fish,

I love fishing in Alaska. The opportunities are endless. But passing Proposal 283 will prioritize 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 of commercial operators preference, further risking the king salmon run in the Kenai River.

I oppose Proposal 283 and ask the Board of Fisheries to vote No on this proposal. Stay the course and protect the kings of the Kenai River.

Thank you,  
Bruce Odelberg

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.

Bruce Odelberg

Kirkwood  
95646



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February 18, 2022

Dear Board of Fish,

Thank you for the opportunity to comment. I am a 65 year old sport angler and former commercial fisherman (Chignik) who fishes primarily in the Kenai River drainage. Our family owns a cabin on the upper Kenai River, in Cooper Landing, and we spend a lot of time on the river in our drift boat. I have a great deal of sympathy and appreciation for the efforts of commercial fisherman but I have an even greater concern for the resource.

Proposal 283 might be a good idea but it isn't a good idea right NOW.

Let's take a breath and let the kings get back on solid ground before tinkering with the regulations.

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. While I love a big king on the end of my line I haven't even targeted them on the Kenai for over a decade. Anything we do to hazard their recovery is unwelcome and extremely risky.

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.

Bruce Service

Anchorage  
99507



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March 07, 2022

Dear Board of Fish,

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

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.

Bruce Smith

Yakima  
98908-5724





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February 16, 2022

Dear Board of Fish,

I've witnessed first hand the decline in kings. Something needs to be done now and changing the rules to allow more predation by commercial fisheries is not it.

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.

Bryan Hansen

Bluffdale  
84065



Submitted By  
Bryan Kirby  
Submitted On  
3/11/2022 10:44:43 PM  
Affiliation

Phone  
907 232 8111  
Email  
[Bryan.Kirby@gmail.com](mailto:Bryan.Kirby@gmail.com)  
Address  
HC 89 Box 809  
Willow, Alaska 99688

Proposal 257: 5 AAC 58.0xx and 5 AAC 77.5xx. East Cook Inlet Razor Clam Sport and Personal Use Fishery Management Plan.

I am in support of this.

I have been part of the Susitna AC for a few years now and I see the value of having a management plan vs not having one in when there is a stock of concern. I believe by having this plan the razor clam harvest will be more transparent.

Proposal 259 / 256 5 AAC 58.022. Waters: seasons: bag, possession, and size limits; and special provisions for Cook Inlet-Resurrection Bay Saltwater Area.

I am in support of these.

I have been taking people across the inlet to the Crescent River drainage and also to Polly Creek for the last 15 years with my charter company. I take an average of 20 trips a year with 6 people on each trip and the last 3 or so years it has been 2 boats so that would be 12 people per trip. The last 3 or so years I have taken an average of about 115-120 people clamming each year to the west side of Cook Inlet. From all of those people I would say there are maybe 10-15 people that get more than 2 buckets (10 gallons) of clams in a day. The proposal by ADF&G is very reasonable and will help with keeping the clam population abundant.



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February 26, 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.

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.

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.

Bryana Sims

Kenai  
99611



Submitted By  
Buck Laukitis  
Submitted On  
3/11/2022 5:52:40 PM  
Affiliation

Phone  
9072990112  
Email  
[Buck.magicfish@gmail.com](mailto:Buck.magicfish@gmail.com)  
Address  
41630 Gladys Ct  
Homer, Alaska 99603

Proposal 282

I support taking NO ACTION on proposal 282.

I have fished the set net, gill net and seine fisheries in Area M since 1989. My wife and I raised our family in False Pass where we lived for 25 years. We currently live in Homer and fish and work in False Pass, King Cove, Sand Point and Dutch Harbor. I've chosen to fish there, because I love the country, and I love the resilient, competitive, hard working local fishermen.

The Board started this chain of events by breaking its own policy. As the Department states in their comments this is an allocative proposal. It should never have been taken out of cycle. So right off the bat some members of the Board appear very motivated to take action, any action, even if it as a flawed proposal like 282. Alternatively I urge you to take up Chignik allocative and other proposals next year when you have the benefit of diverse public proposals in cycle. Plus you have the benefit of the Department's latest science (e.g. productivity analyses and revised escapement goals).

The Board's first principle should be to do no harm. Why do economic harm on three Alaskan communities (False Pass, King Cove and Sand Point) In the HOPE of helping one? HOPE is not a strategy. Did the Board actions curtailing the Dolgoi Island section get the desired result? Did curtailing the Kodiak mainland Igvak historical fishery get a commensurate benefit for Chignik? Hard to say? Well then they probably weren't very precise management tools.

The Department has shown it has the authority to manage any real unforeseen conservation issues this coming season as it has in the past.

As a fisherman I know that there is no correlation or cause and effect between my sockeye catch and Chignik stock conservation. This past season we caught a lot of sockeyes. It had been a very long time since sockeye set in the June fishery. But the sockeye we caught were 3.5 pound fish and going west. I don't need a genetic stock analysis to know that what we caught were not Chignik fish. This season we have the largest sockeye forecast ever in Bristol Bay. The Board would be negligent to curtail opportunity in Area M to harvest the state's valuable resources. Fully utilizing our processors and fishermen will be essential to maximize the value of the Bristol Bay run.

I'd like to remind the Board that we are in an economic crises of unparalleled dimensions. Fuel and transportation costs and supply chain dislocations are going to our very challenging for our businesses. Our remote coastal communities are in peril. No Area M fisherman wants to hurt Chignik residents. We all need to survive, but this proposal isn't the right approach for Chignik. Please do no harm until you can identify a better course of action than simply cutting our fishing time.

A good friend from King Cove probably said it best about our mixed stock fishery: "The river where we fish is right outside our harbors. That is why our communities are there. It's all in the ocean, but the fish come by from June to September. It is not always predictable, but its all we have to rely on."



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February 15, 2022

Dear Board of Fish,

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

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

Callie Benjamin

Anchorage  
99501



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March 07, 2022

Dear Board of Fish,

I live in Arizona and I come to fish camp on the Kenai annually which I have done for the past 8 years. The salmon in the Kenai have been effected by the over fishing of the commercial fisherman for several years now. Passing Proposal 283 will just add to the over-fishing and I believe will have a lasting and devastating effect on the Kenai River and king salmon. Do not pass Proposal 283.

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

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?

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.

Candace Shelton

Tucson  
85719



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February 19, 2022

Dear Board of Fish,

King Salmon fishing needs to be Closed for 7 straight seasons in order to facilitate their recovery without harassment by anyone including commercial harvest by using a smaller mesh net and limiting the depth of the net.

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 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.

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.

Carol Keller

Soldotna  
65616



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February 16, 2022

Dear Board of Fish,

Give Kings a chance, don't lower escapement #,  
You have a choice- low commercial #'s now or no kings in future- temporary or permanent!

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.

Cartier Wendy

Soldotna  
99669





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February 24, 2022

Dear Board of Fish,

Changing these regulations will lead to a drastic increase in harvest of king salmon who's population is in dire need of protection, just so a few setnetters can make an extra few hundred to few thousand dollars each. Allowing the nets to go in even if the run is hurting so much they close the river to sport harvest is Putting the future of the kenai king run in dire peril! It's not worth it!! Set net king harvest numbers are not recorded properly with many fish falling out of the nets dead before they get pulled and a great many fish being brought home as home pack for personal use so as to not be recorded.

If you don't believe it go walk the kasilof beach personal use set nets in June. You will see more dead kings being pulled out of the nets than sockeye! Now imagine this on a commercial level!

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.

Cayla Chadwick  
Soldotna  
99669



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February 18, 2022

Dear Board of Fish,

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

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.

Charles Bowman

Hartsburq  
65039



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March 12, 2022

Dear Board of Fish,

I am a lifelong Alaskan that has sport fished for king salmon on the Kenai for as long as I can remember.

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.

Charles Courtright

Eagle River  
99577



March 11, 2022

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Comments on Proposal 282**

Chairperson Carlson-Van Dort and Board Members:

My name is Cherilyn Lundgren and I live in Sand Point. I am employed with Aleutians East Borough School District as the Business Office Specialist. I have worked for the district for 16 plus years. I am also the wife of an Area M seiner and have children that fish Area M.

I am writing to oppose Proposal 282. The impact this would have on our communities would be devastating.

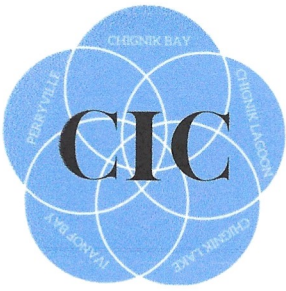
The Aleutians East Borough is home to over 3000 Alaskans, many with a heritage in the Eastern Aleutians that goes back hundreds of years. Our population has always been dependent on fishing. We have no other industry that sustains our communities. Without jobs to sustain our families through the winter, many families would be displaced from their homes. Without fishing, we cannot maintain our cities and local jobs. This will have immeasurable impact on our families and schools. The School District employs locals, who know and care for our children. We may need to cut those jobs because of the loss in enrollment and revenue.

Since I have worked with the School District, I have seen the effects fishing has on our communities. The School District had 6 schools in our District and 2 of the 6 have closed. The other 2 small sites have struggled over the years to keep the student count above 10. We are still struggling to keep the student count above 10. Sand Point has dropped below 100 for the first time since the Aleutians East Borough School District formed. This will have a financial impact on the School District funding for this upcoming school year. Fortunately, the Borough has helped with funding to keep these schools in operation when they have dropped under the student count required for State funding. Without the revenue from the fish taxes, there is no guarantee the Borough would be able to help the schools stay open.

Thank you for your time.

Sincerely,

Cherilyn Lundgren



**CHIGNIK INTERTRIBAL COALITION  
427 AIRPORT ROAD  
CHIGNIK LAGOON, ALASKA 99565**



PC080  
1 of 1

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

March 11, 2022

Support Proposal 282

Dear Chairman and Board Members,

These comments are submitted on behalf of the member tribes of the Chignik Intertribal Coalition (CIC). The CIC comprises Chignik Bay, Chignik Lagoon, Chignik Lake, Ivanof Bay, and Perryville.

Exceptionally low returns of sockeye between 2018 and 2021 have prompted a concerted effort by our communities and tribal members in conserving our runs. At this time, additional actions are required to ensure the sustainability of our main resource.

Our tribal members have been adaptive to changes in resource abundance and marketability. Our sockeye salmon remains the primary element that ties the subsistence and commercial fisheries together. It is also at the core of maintaining our cultural heritage and community well-being.

Proposal 282 asks only that fishing time in the Shumagins and Dolgoi Islands be reduced if the midpoint of the Chignik River early-run sockeye salmon escapement goal range is not being met. This is reasonable. Proposal 282 will do that while maintaining commercial harvests in both the Shumagin and Dolgoi Island areas and potentially increasing the number of sockeye salmon returning to CMA.

The Shumagin and Dolgoi Island salmon fisheries should not be exempt from sharing the burden of conservation on stocks immediately bordering their fishing areas.

Sincerely,

George Anderson

Chignik Intertribal Coalition, President

Chignik Lagoon Village Council  
PO Box 9  
Chignik Lagoon, AK 99565  
clvcoffice@gmail.com



PC081  
1 of 1

March 10, 2022

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

Subject: Support Proposal 282

Dear Alaska Board of Fisheries,

The Chignik Lagoon Village Council would like to express that the vitality of this community is extremely dependent on the Chignik salmon runs which fuel the subsistence and commercial fishing livelihood of our people. The mainstay of our economy are the two sockeye runs which have gone from historically strong to now very weak. The early run has not even reached the lower end of its escapement goal since 2017.

Passing proposal 282 would be monumental to Chignik (and other fisheries who rely on Chignik as a hatchery to sustain their runs), as it calls for Shumagins and Dolgoi fishing areas to assist in reaching our early run escapement goals. This proposal is reasonable because Chignik-bound sockeye are caught in both areas, therefore the burden of conservation should fall on the shoulders of both. The Chignik fishery is suffering now, but other fisheries will suffer in the future as the Chignik River acts as a hatchery for other runs. Proper escapement is of the utmost importance for conservation of these runs and future fisheries.

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

Thank you,

Chignik Lagoon Village Council



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February 18, 2022

Dear Board of Fish,

I live in Redmond, Washington and have seen Puget Sound fisheries decline to where there is very limited fishing. It would be terrible to see the Kenai River fisheries reach a similar outcome due to a short-term management perspective. The proposal is an incredibly bad idea to lower escapement goals to allow commercial fishing as it risks putting the King Salmon fishery on a death spiral that will forever limit future fishing opportunity for all.

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.

Chris Chu  
Redmond  
98053



Submitted By  
Chris Every  
Submitted On  
3/10/2022 11:42:07 AM  
Affiliation

I am in support of proposal to 283.

If there are any thoughts from the commissioner, BOF members, ADF&G (Commercial and Sport) to allow the ESSN fishery to have some harvest opportunity during an in river King Salmon closure, ESSN fishermen would greatly appreciate your suggestions.

I believe we should be allowed to fish on ADF&G's projection of the SEG.

Most all fisheries in Alaska are allowed to fish on an ADF&G projection of achieving the SEG or OEG. Why should the ESSN fishery be held to a different standard.

The paired restrictions are very bias toward the Setnet group.

All user groups are allowed to participate in the sockeye fishery except the ESSN group.

ESSN should be allowed to participate now that the 600' fishery has been placed on the table. (Numbers are the proof)

Last, it seems to me that we are fighting the entire state to be allowed to fish, when the regulation book states the commercial fishermen are to be the primary harvester of sockeye salmon,

Let's work together and get the ESSN's in the water.





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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.

Chris Stephend

Sterling  
99673



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March 08, 2022

Dear Board of Fish,

I own a cabin on the Kenai river and enjoy the benefits of being allowed to fish this beautiful river, while I would love the opportunity to catch a king, I fully understand the need for all of us to carefully manage and control the continued stocks of these magnificent species, to allow commercial fisheries to start to harvest again would be unfair to others and to the the species itself. I would be in favor of stopping all fishing of kings for up to a five year period if it meant the restoration of kings for the future.

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.

Christopher Batters

Anchorage  
99515



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February 19, 2022

Dear Board of Fish,

We have a house on the Kenai River and have seen the king salmon run diminish every year. This fishery needs better management and it is hard to argue that stopping set nets near the Kenai will enhance escapement. The incidental harvest of chinook salmon is not insignificant and likely more than what is taken by all sport fisherman. This is a favorite river amongst tourists and needs protection from commercial fishing.

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.

Christopher Manion

kenai  
99611



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February 28, 2022

Dear Board of Fish,

I am an Alaskan resident residing in Palmer AK. I work on the North Slope as a facility operator. I have lived in Alaska for just shy of 20 years. I love to hunt and fish and enjoy all that Alaska has to offer. I am frustrated with the bad judgement when it comes to fishing regulations that have a bias toward the commercial side of the industry. I remember being able to fish local rivers in the valley for King salmon. Around 2008, that all changed and has yet to return to what it was prior. Now the same thing has happened on the Kenai and other rivers on the peninsula. Why is it so hard to take the high road and regulate our fisheries with the mindset of preserving it rather than only thinking about how much money you can stuff in your pockets. The majority of revenue from commercial fishing doesn't even stay in Alaska. Sport fishing has always been more profitable for Alaskans. How much money and how many businesses need to disappear before this makes sense? I urge you to do the right thing and vote NO on proposal 283 and make the priority about preserving our resources instead of exploiting them.

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.

Christopher Meltz

Palmer  
99645



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March 08, 2022

Dear Board of Fish,

Hello I am a 54 year resident of Alaska  
I have been fishing the Kenai River since 1974  
and have lived on the River for the last 10 years  
The king fishery's impact has limited tourism for at least the last five years  
I firmly believe that the fishery needs to be closed period no salt, set net, or river fishing  
Thank you

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

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

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

The 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.

Christopher Mizo

Kenai  
99611



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February 24, 2022

Dear Board of Fish,

I recently acquired my property in Alaska after 20 years of traveling to the Kenai to fish and vacation. I am appalled at the impact on the king salmon fishery over the last several decades and encourage the Board to make common sense decisions to provide consistent and fair protections that apply to all - commercial and non-commercial. I bought property so my children and grand children will have the opportunity to catch a king salmon someday and understand the beauty of Alaska and all it stands for.

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 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.

Signed  
Chris Smith

Christopher Smith

Soldotna  
99669



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February 16, 2022

Dear Board of Fish,

I am a lifelong born and raised Alaskan, I grew up fishing the Kenai river and have been all over the state fishing. I have retired and now live in Kenai on the river and it's very personal to me to preserve the resource. Our community is very tourism driven and history has shown the massive increase in tourism to our community started after Les Anderson caught the world record king salmon on this river. Without the world class fishing this river is known for that bring tourists from all over the world to our state. These businesses lose their livelihoods. Tourism is one of the biggest industries for our state. People who come to fish buy fishing gear, fuel, food, hotels. They support our entire local economy where their money supports our community and year round Alaskans. Commercial fishing does not support any of the local businesses and most crew are from other states so what money is made does not support our state. Please do not pass this proposition. Our king run is in severely threatened status and needs to be protected at all costs

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

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

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

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

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

Christopher Trueblood  
Kenai  
99611



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February 15, 2022

Dear Board of Fish,

I live in Anchor Point and dipnet the Kenai. I'd be happy to give up on that completely if it would help the kings. If cutting back commercial would help I'm all for that. I do believe the catch further out in the ocean has an even bigger impact but helping kings where we can is something I support. Or open it for all to catch and put them on the endangered species list in the near future. History is watching what we do today and will judge us.

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

The standard should remain that meeting the conservation needs of the weakest stocks is more important than avoiding the upper limit of another species.

Passing 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'm not as sure about this. I don't envy you your jobs.

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. Stay the course and protect the kings from all fishing. I'd even say either everyone fishes or no one does. Maybe no one fishes until 15000 or more kings meet escapement and then everyone fishes.

Christy Tyler





# Long-term perspectives on freshwater habitat in the Chignik Watershed

By: Dr. Daniel Schindler, University of Washington School of Aquatic and Fisheries Sciences,  
deschind@uw.edu;

(11/2021 presentation to the Alaska Corps of Engineers, Anchorage, AK)

## **EXECUTIVE SUMMARY**

1. The Chignik watershed functions as a diverse network of rearing habitats (Sockeye rearing occurring in Black and Chignik lakes, Chignik River and Lagoon)
2. Climate warming has improved the growth conditions of juvenile sockeye salmon in the Chignik watershed (producing larger fry; Chignik Lake which provides important early-run and late-run rearing habitat will improve from increased warming);
3. Importance of Black Lake for growth of juvenile sockeye is highly variable among individuals and among years (Annual diversity occurs in rearing strategies and habitats used (Black L, Chignik L. and Chignik Lagoon);
4. While Black Lake has undergone some transformations which began in the late 1960's, current monitoring indicates that the lake and its outlet area on Black River have stabilized over the last decade. There is no evidence that either geomorphic change or climate change has negatively impacted sockeye production from the watershed. In fact, long-term ecological monitoring throughout the watershed shows conclusively that juvenile rearing conditions have improved substantially from the 1960s to the present as lakes have warmed up with ongoing climate change.
5. A future loss of important early-run rearing habitat could develop. Alec River, the principal spawning habitat for the early run enters Black Lake via two channels; the south channel flows into the lake's smaller, lower basin while the north enters the lake's primary, larger basin. If the south channel were to expand to cause the loss of the north channel flow, sockeye fry access to the lake's main rearing area could be severely compromised leading to lower early-run productivity. The potential risks and benefits to sockeye of different habitat interventions that would stabilize flows from the north and south channels should be assessed as part of ongoing scientific research in the watershed.



6. Based on computer modeling and analysis of historic data, increasing the elevation (volume) of Black Lake will likely have little effect on sockeye rearing use and survival in Black Lake due to elevated temperatures with expected future climate conditions. However, warming trends are very likely to continue improving the growth opportunity provided in Chignik Lake. Thus, maintaining connectivity among the various habitats throughout the Chignik watershed will ultimately provide resilience to the overall sockeye salmon stocks in this ecosystem;
  
7. Annual low returns in Chignik's early-run and late-runs are likely associated with greater early-marine mortality and the possibility of reduced pelagic (blue-water) rearing conditions in the Gulf of Alaska, that have had similar effects on other sockeye systems draining to the Gulf throughout this region.



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March 07, 2022

Dear Board of Fish,

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

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

Cody Marvel



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February 16, 2022

Dear Board of Fish,

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

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

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Colby Duxbury

Stanwood  
98292



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February 16, 2022

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Colby Duxbury

Stanwood  
98292



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February 20, 2022

Dear Board of Fish,

I live in MN but vacation in Kenai. My friends own a resort on the Kenai River and he is a guide. I have fished all my life both here and in Alaska. I feel that lowering the escapement goal of King Salmon would be a detriment to the future populations in the river. I am a big fan of catch and release, as I truly love the sport of fishing. Please don't endanger the future of sport fishing.

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.

Colette Fitterer

Brainerd  
56401



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February 16, 2022

Dear Board of Fish,

I'm a long time Alaskan (50+years) who has fished and followed fish politics all my years in Alaska.

I'm also a former member of the F&G Citizen Advisory Council. I oppose any regs that would reduce the Kenai River King run. No where else in the world is there a fisheries resource available to the general public like the Kenai Kings. They should be managed to only increase their numbers. Thanks for considering my point of view

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.

Con Bunde

Anchorage  
99517



**CONCERNED AREA M FISHERMEN**  
35717 Walkabout Road, Homer, Alaska 99603  
(907) 235-2631

Chairwoman Marit Carlson Van Dort, Alaska Board of Fisheries  
Alaska Board of Fisheries  
P.O. 25526  
Juneau, Alaska 99802-5526

March 10, 2022

Dear Chairwoman Carlson-Van Dort and Board of Fisheries members:

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

**CAMF (Concerned Area M Fishermen) opposes proposal 282, and recommends the Board take NO ACTION on this proposal at this time.** The Board will consider regulatory changes for the Alaska Peninsula and Chignik salmon fisheries at its regular 2022//2023 meeting cycle. The Alaska Department of Fish and Game has recently completed an escapement goal review for the Chignik system, and it seems highly likely that the escapement goals under which the Chignik system is managed will be changed for 2023. The basis for the proposed management of the Shumagin Island fishery, as contemplated in Proposal #282, could well be rendered moot by different escapement goals in place for Chignik in 2023. Also, the Department has forecast the Chignik system will meet its escapement goals and provide for a harvestable surplus for the 2022 season, for both the early and late sockeye runs. In addition, the Department has previously used its emergency authority to restrict the South Peninsula fisheries if it appears the Chignik system is dramatically below its escapement goals, and they could certainly do so in 2022 should this forecast prove significantly inaccurate. For these reasons, CAMF believes it is premature to take Board action, which may significantly impact the South Peninsula fishery for 2022, when the landscape for management of the Chignik system could change dramatically in the following season.

CAMF represents 110 salmon gillnet permit holders (about 75% of the active drift gillnet fleet) who fish the Alaska Peninsula. A significant portion of our membership lives on the Kenai Peninsula, Kodiak, and the coastal communities of the Alaska Peninsula. While CAMF members do not participate directly (other than members who also hold set net and seine permits) in the Shumagin Islands fishery we also depend on it. Many of our members are local residents. Almost all our members use facilities in Sand Point, King Cove, and False Pass for services that are vital to our fishery. These towns rely on fish tax revenue that fishers provide, and we rely on processing companies, numerous local businesses, and harbor facilities to keep our operations going. If the proposal is passed as written there could be a change in fleet dynamics, and economic cost, that is at this time hard to quantify.





CAMF has been active in the Board process for over 30 years; and has contributed in part to the development of these current management plans. CAMF representatives also served on the Western Alaska Salmon Stock Identification Project (WASSIP) Advisory Panel from which much of the science on the western Alaska salmon fisheries was derived

In the attachment to these comments, we review the South Peninsula June fishery, including the history and importance of the fishery and prior Board actions and findings. There has been a long history of regulatory action in this fishery and we urge Board members to review this history for familiarity. The Board of Fisheries has held three in-cycle Alaska Peninsula meetings—in 2013, 2016 and 2019--after the release of WASSIP. We include BOF actions taken at these meetings that directly address issues related to Proposal 282--which is the first Agenda Change Request generated proposal accepted by the Board for this fishery in 25 years.

Also included with these comments are portions of NPAFC Newsletter No.36 pages 26 to 32 "*Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries*", which is a valuable synopsis of WASSIP. In addition, we discuss WASSIP results, including harvest rates, stock composition, and variability between fisheries and yearly seasons.

Thank you for taking the time to review these comments. CAMF again urges the Board to take no action on Proposal 282 at this March 2022 meeting and instead wait to address these issues during the regular meeting cycle next when all of the information pertaining to the Chignik system is available for Board consideration.

Sincerely,

Steve Brown, President  
35717 Walkabout Rd.  
Homer, AK 99603

Figure 1.



### Harvest Rate vs Stock Composition of all WASSIP fisheries with a Harvest Rate greater than 1%

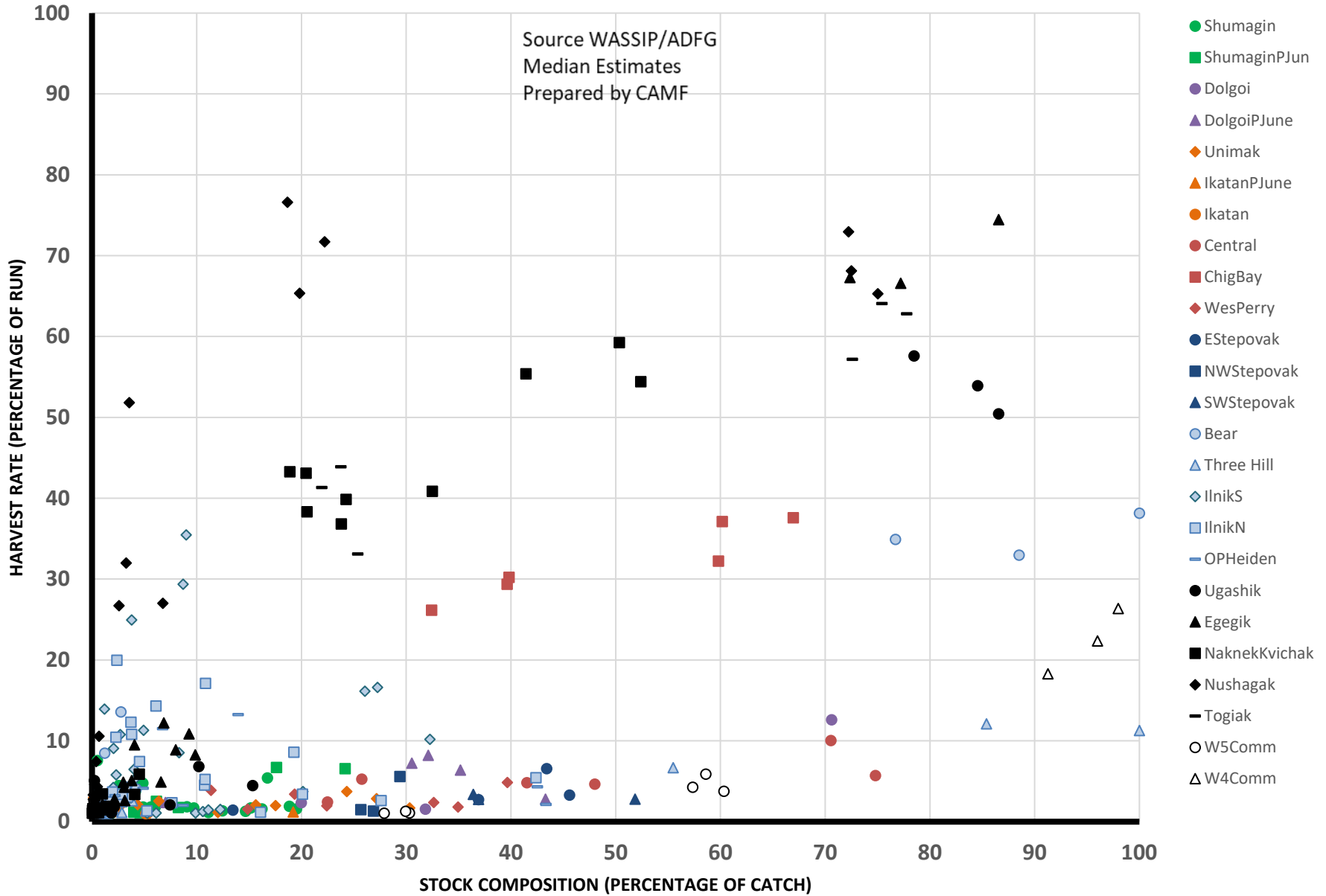
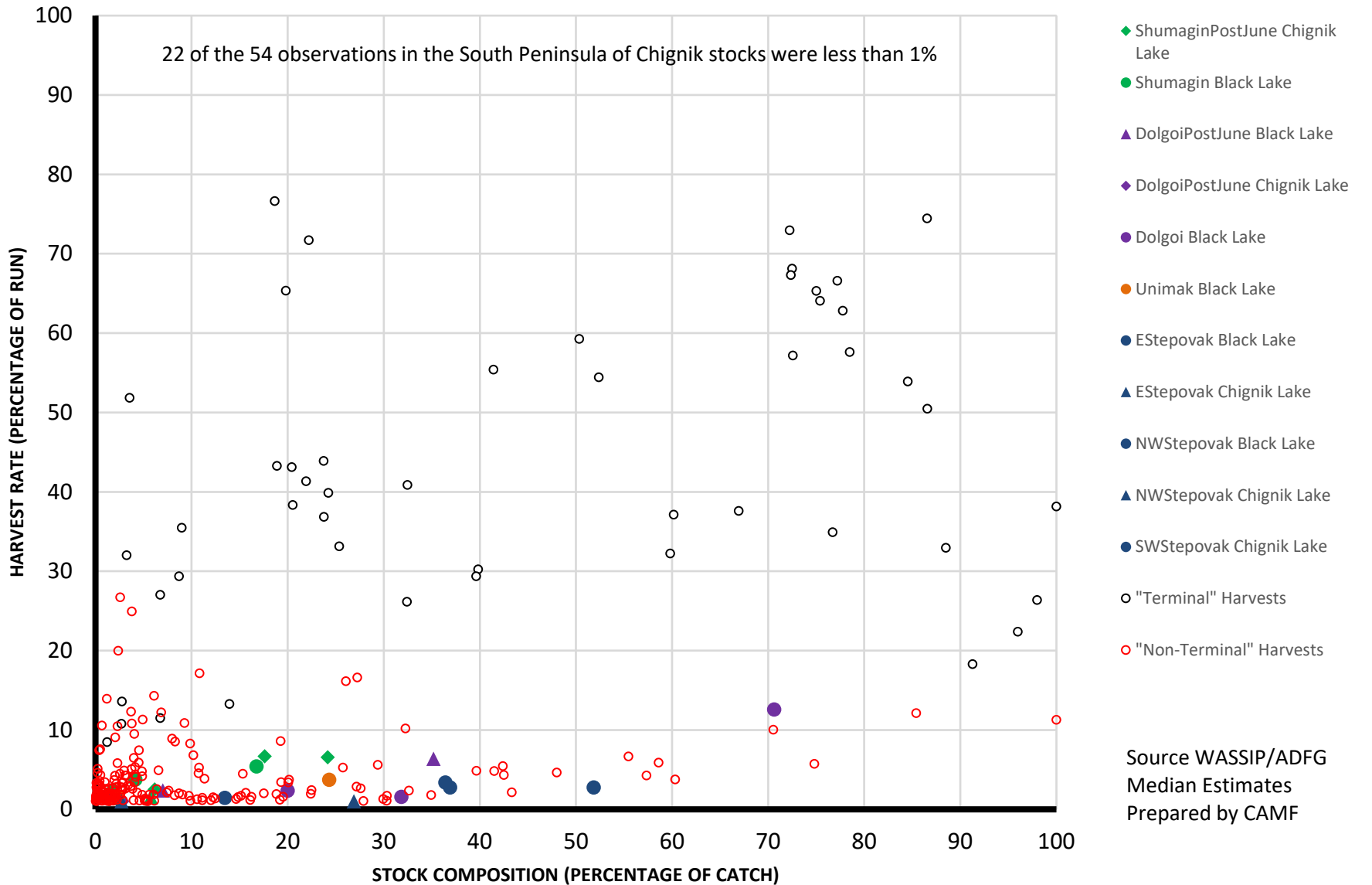


Figure 2.



### South Peninsula Fisheries of Chignik Stocks are Highlighted (06,07,08) Harvest Rate vs Stock Composition with Harvest Rates Greater than 1%



## Stock Composition Compared to Harvest Rate.

While detailed estimates of stock composition and harvest rates for years after WASSIP are not possible it is possible to make general references comparing different fisheries throughout Western Alaska.

**Figure 1** is a scatter plot with Harvest Rate on the vertical axis and Stock Percentage of Catch on the horizontal axis for all WASSIP fisheries during all years (2006-2008). Fisheries with harvest rates of less than 1% on a given reporting stock in a given year are excluded to reduce clutter; consequently, 340 of the 1777 possible combinations remain and are represented on the plot. In general, fisheries prosecuted in terminal areas have higher harvest rates but not necessarily higher stock percentages. The Shumagin Is. fishery, shown in green, is characterized by low harvest rates. Reduction in fishing opportunity in the Shumagin Is. would provide limited benefit to the Chignik fishery.

**Figure 2** is the same plot as Figure 1 but differentiates “terminal fisheries” (black circles) and “non-terminal fisheries” (red circles) with the South Peninsula fisheries highlighted. 22 of the 54 observed South Peninsula fisheries during WASSIP fall below the 1% harvest rate threshold on the plot. Notice again a vast majority of the black circles represent higher harvest rates, while red circles occupy lower harvest rates. On the other hand, black and red circles are represented at all stock composition rates.

Simply having a high stock composition in any given fishery has little significance in fisheries management without information about the size of the catch compared to the size of the run. CAMF is firmly committed to future research, we always have been. We are strongly against future studies that don't include harvest rate estimates, which in turn, promotes propaganda against our long standing mixed-stock fisheries. We look forward to working with the department in any well-thought-out plan and believe they have the ability in the future to produce the same world-class science they have produced in the past.

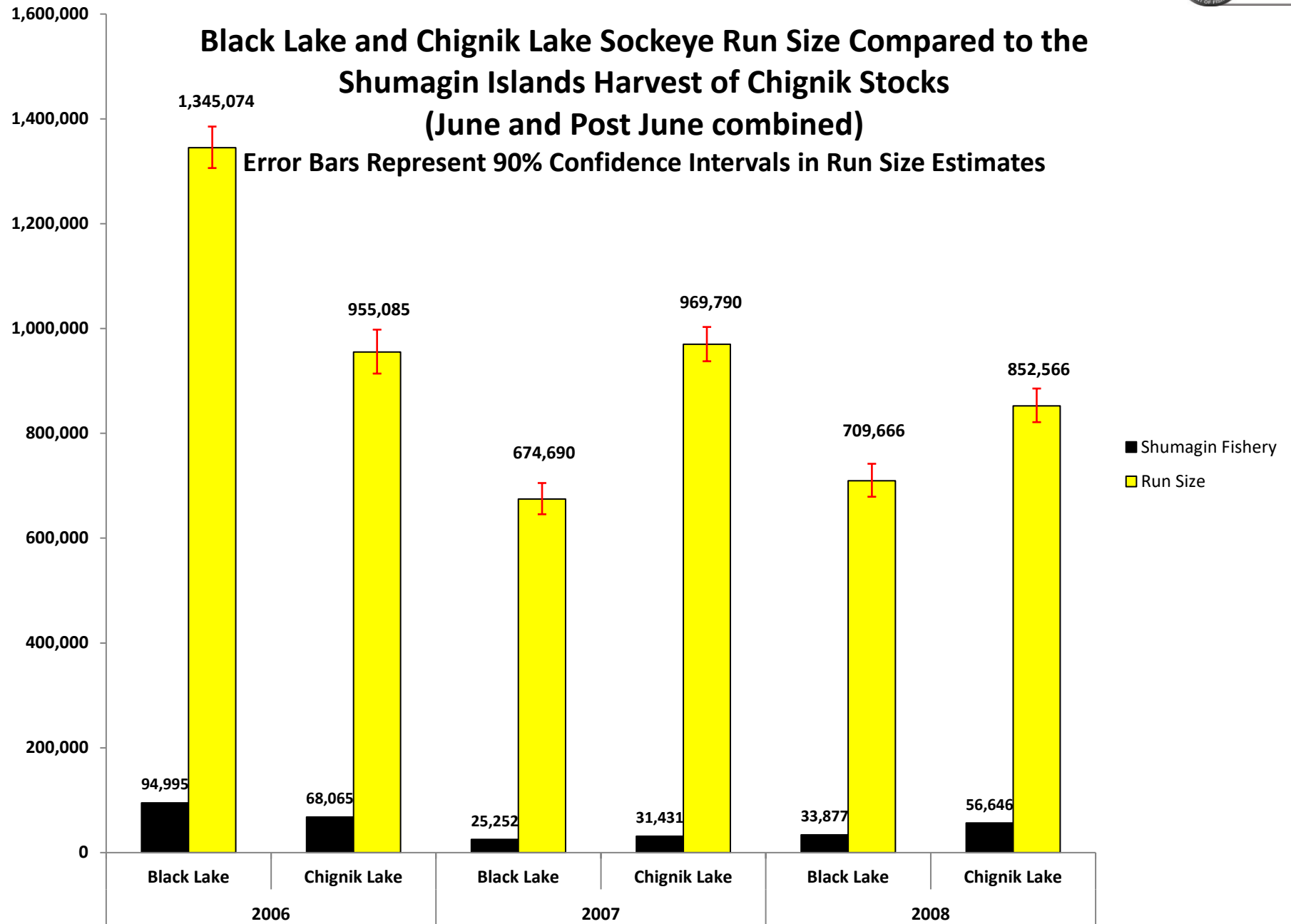
Due to the low harvest rates of the Shumagin Is. fishery CAMF believes that the board's Mixed Stock Policy should be applied, and Proposal 282 is an allocation decision. If the proposal were to pass little gain would be achieved in the Chignik Area.

## WASSIP Results

**Figure 3** compares the run size of the Black Lake and Chignik Lake reporting stocks to the sockeye catch in the Shumagin Is. during the WASSIP years. In 5 of 6 observations the 90% confidence interval range is greater than the Shumagin Is. median estimate.

**Figures 4 and 5** details the portion of the total run estimated (median values) returning to the Chignik Management Area and is represented by the bright red portion of the pie graphs in the figures. The gold section of the pie graph represents the Shumagin Island fishery directly related to Proposal 282.

Figure 3. Black Lake and Chignik Lake Run Size compared to Shumagin Is. Harvest.



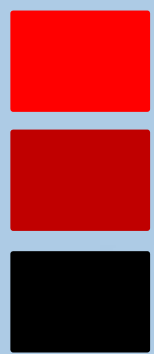
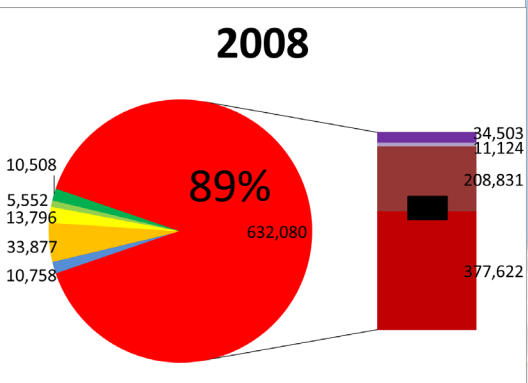
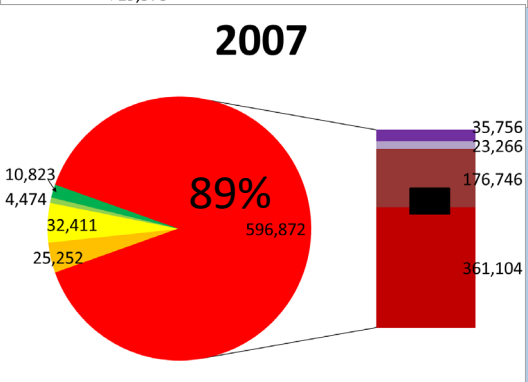
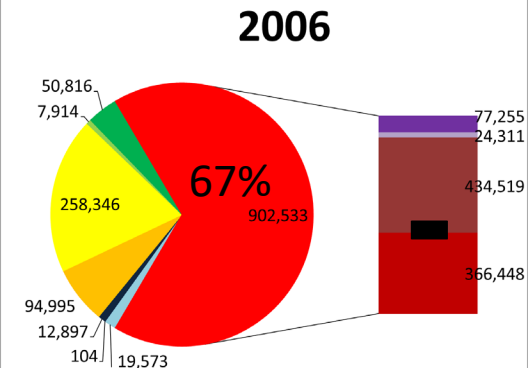
Number of Sockeye are Median estimates per WASSIP

Figure 4. Sockeye returning to Chignik Management Area.

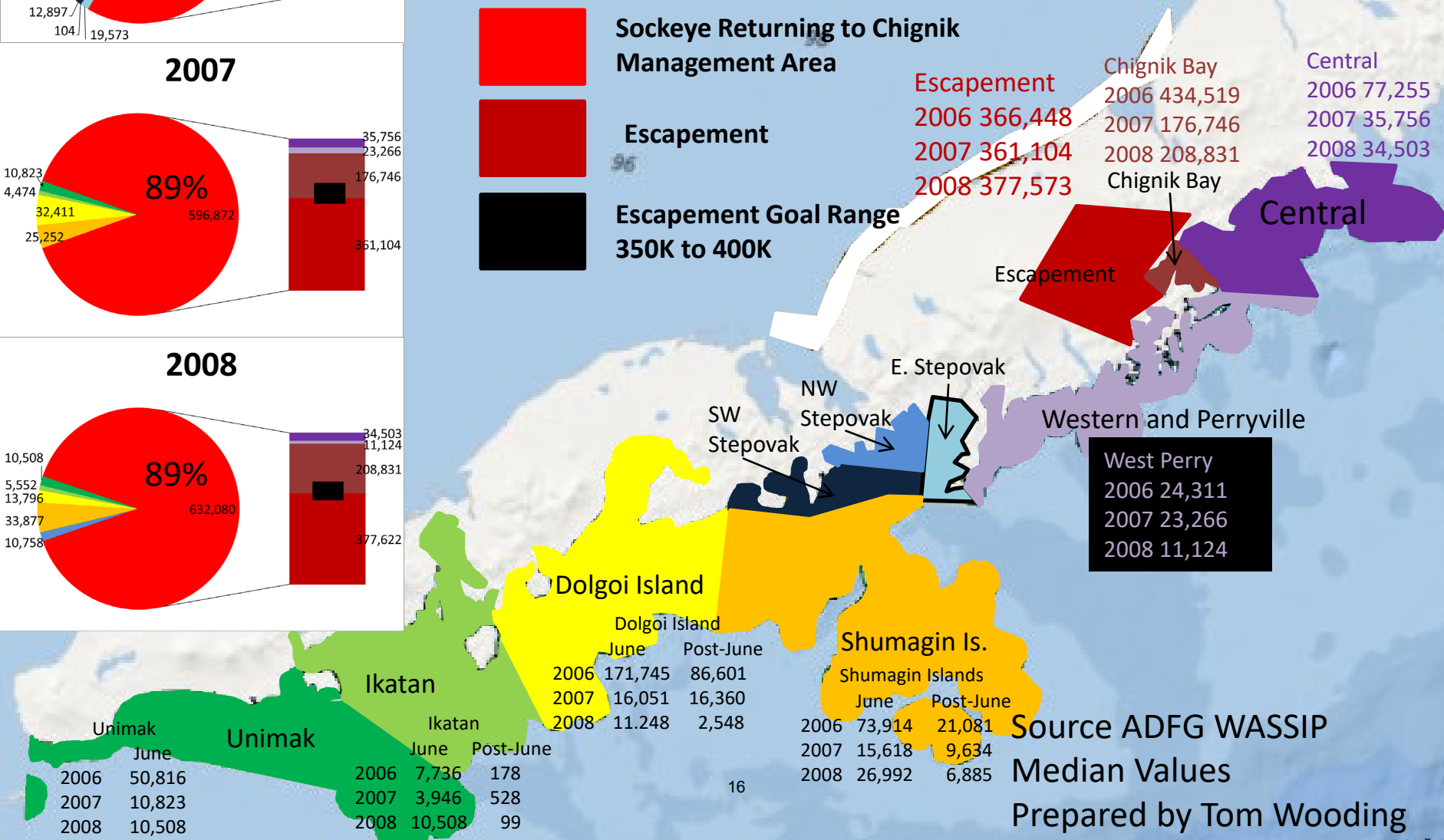


# Black Lake Reporting (WASSIP Total Run)

Median catch estimates shown for each area each year



Area	Year	Escapement
Chignik Bay	2006	434,519
	2007	176,746
	2008	208,831
Central	2006	77,255
	2007	35,756
	2008	34,503



Area	Year	June	Post-June
Dolgoi Island	2006	171,745	86,601
	2007	16,051	16,360
	2008	11,248	2,548

Area	Year	June	Post-June
Shumagin Is.	2006	73,914	21,081
	2007	15,618	9,634
	2008	26,992	6,885

Area	Year	June	Post-June
Unimak	2006	50,816	178
	2007	10,823	528
	2008	10,508	99

Source ADFG WASSIP  
Median Values

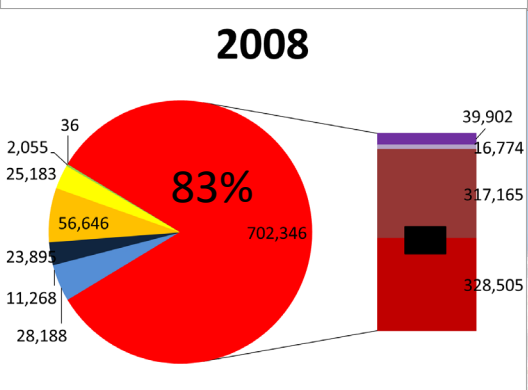
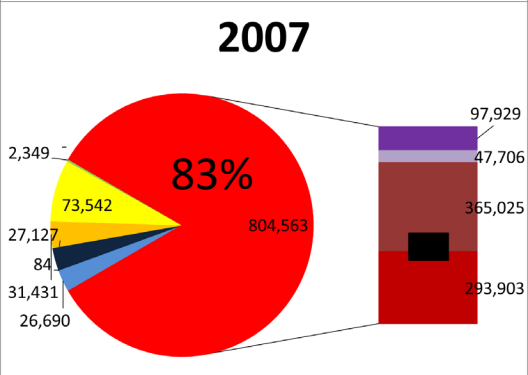
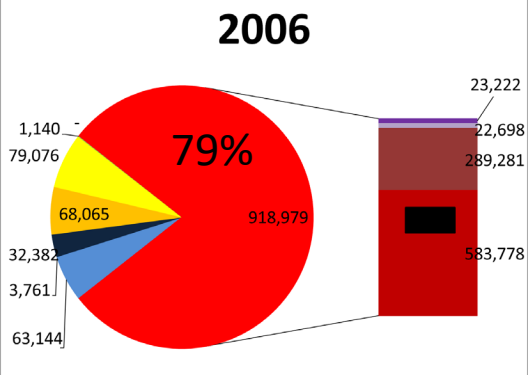
Prepared by Tom Wooding

Figure 5. Sockeye returning to Chignik Management Area.

# Chignik Lake Reporting (WASSIP Total Run)



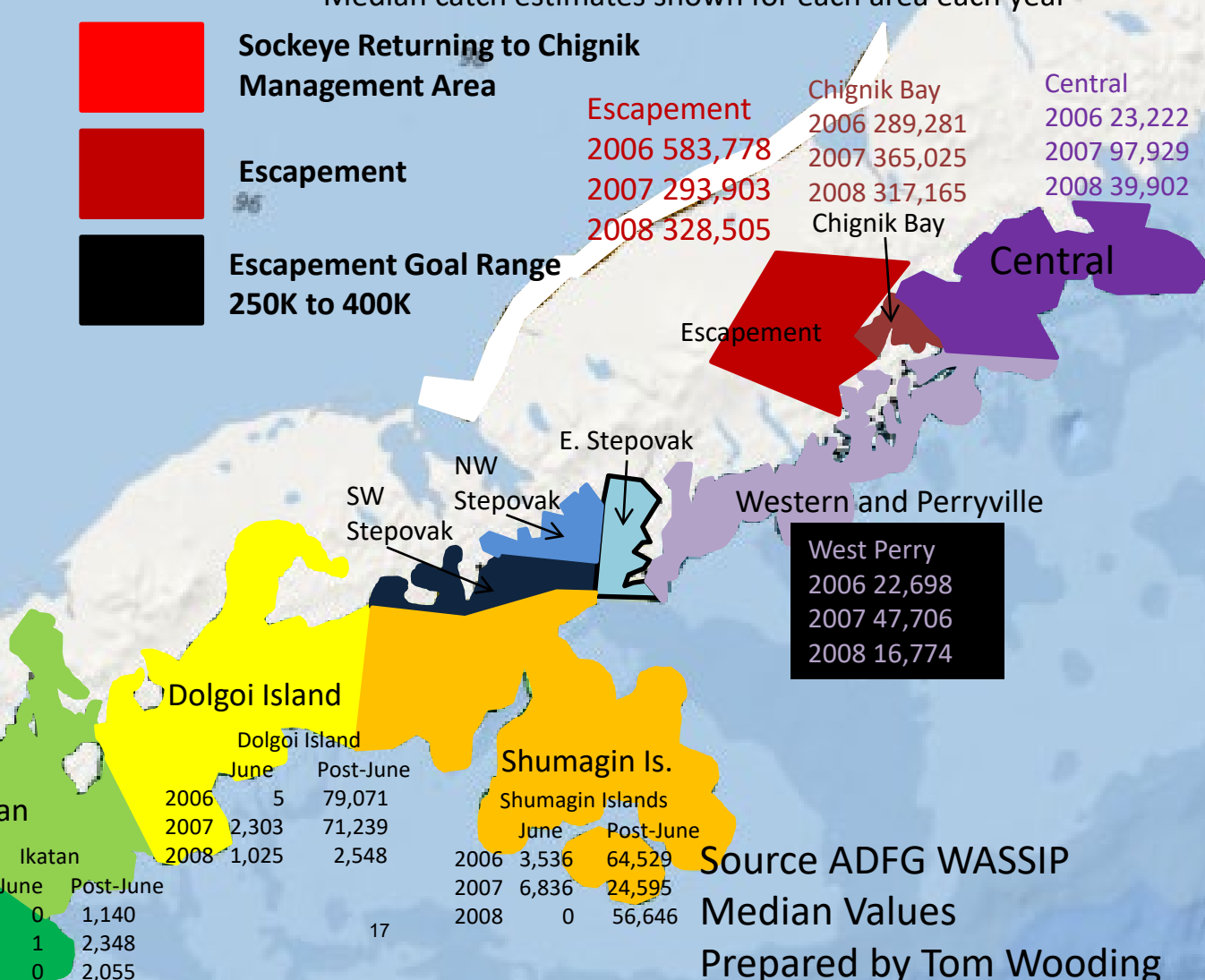
Median catch estimates shown for each area each year



Ikatan, Dolgoi I. and Shumagin Is.  
Include Harvest in June and Post-June



Area	Year	Escapement
Chignik Bay	2006	289,281
	2007	365,025
	2008	317,165
Central	2006	23,222
	2007	97,929
	2008	39,902



Dolgoi Island

	June	Post-June
2006	5	79,071
2007	2,303	71,239
2008	1,025	2,548

Shumagin Is.

	June	Post-June
2006	3,536	64,529
2007	6,836	24,595
2008	0	56,646

Unimak

	June
2006	0
2007	0
2008	36

Unimak

Ikatan

	June	Post-June
2006	0	1,140
2007	1	2,348
2008	0	2,055

Source ADFG WASSIP  
Median Values

Prepared by Tom Wooding





## WASSIP and Regulatory Changes Afterward

The 9-year, 9-million-dollar WASSIP study was essentially a snapshot of longtime Western Alaskan salmon fisheries in the years 2006 to 2008 for sockeye, and 2007 to 2009 for chums. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the study. Steve Brown and Pat Martin were CAMF's Advisory Panel representatives.

The full sockeye report can be found at:

<https://www.adfg.alaska.gov/FedAidpdfs/SP12-24.pdf>

There are some important factors to consider when examining the harvest rate results. In the report on page 35 of "Habicht, C., A. R. Munro, T. H. Dann, D. M. Eggers, W. D. Templin, M. J. Witteveen, T. T. Baker, K. G. Howard, S. D. Rogers Olive, H. L. Liller, E. L. Chenoweth, and E. C. Volk. 2012. Harvest and Harvest Rates of Sockeye Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2006-2008."

*"Most genetic stock identification studies for salmon in Alaska limit reporting to calculated stock proportions in the sampled fishery strata. The extension of estimated genetic stock proportions in WASSIP fisheries to stock-specific harvest rates represents a broader application of genetic stock identification than first envisioned for the WASSIP study. Estimation of harvest rates provides a fundamentally different view of stock-specific fishery impacts, but requires detailed assessments of harvest and escapement for WASSIP fishery stocks, with explicit statements of uncertainties associated with each. However, when considering harvest rates, it is important to recognize that they are likely overestimates of true harvest rates. This is because our estimates of stock-specific escapement are almost certainly biased low (see Eggers et al. 2012) and we are also unable to account for harvest of WASSIP stocks outside of the WASSIP area. Each of these contributes to estimates of stock-specific total runs (denominator in harvest rate calculations) that are biased low, which results in harvest rate estimates which are biased high. While stock-specific harvests and harvest rates have been estimated for Bristol Bay sockeye salmon (Dann et al. 2009; Dann et al. 2011), these estimates were based upon a much more limited geographic range of fishery sampling, robust stock assessment, and a greatly reduced genetic baseline relative to WASSIP."*

In addition, the WASSIP study comments on variability and making inferences within and outside WASSIP years on page 38.

*"Like most other scientific studies, WASSIP analyses represent environmental and fishery conditions during a specific period of time. Nonetheless, these studies are conducted so that future scientific and policy activities may be better informed. We expect that WASSIP results will be cited for many years to come as the most comprehensive data set available to examine stock composition of sockeye and chum salmon in commercial and subsistence fisheries of Western Alaska. However, while this three-year data set provides some measure of interannual variability in stock composition, some caution must be exercised when extrapolating the results to years not analyzed because changes in relative abundance among reporting groups, prosecution of*





*fisheries, or migratory behavior due to ocean conditions might affect distribution of stock-specific harvests among fisheries.”*

This snapshot was taken with the regulations that existed at the time of the study. Since then, regulations have changed, more specifically they have changed with respect to the Proposal 282 which you are considering at this meeting.

The changes to the fishery are best described in ADFG Regional Information Report No.4K21-12, “South Alaska Peninsula Salmon Annual Management Report, 2020, and Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amilia Islands Management Areas” by Elisabeth K.C. Fox, Tyler D. Lawson and Ross L. Renick. Pages 4 and 5.

<https://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2021.12.pdf>

*“In 2013, the BOF discussed proposed changes to the regulations involved with the June management plan. The BOF modified the June schedule for seine and drift gillnet gear by delaying the start date to June 10, which reduced fishing time by 64 hours. The June fishing schedule for set gillnet gear remained unchanged (Appendix B1). During the February 2016 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the BOF made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365) and the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366) by adopting regulations to limit the number of sockeye salmon harvested in the Western Alaska Salmon Stock Identification Program (WASSIP) described “Dolgoi Island Area” (statistical areas 283-15 through 283-26 and 284-36 through 284-42; Appendix B3). From June 1 through July 25, a harvest limit of 191,000 sockeye salmon, based on fish ticket information, was created. Once this harvest limit is reached, the portion of the West Pavlof Bay Section south of Black Point (statistical area 283-26) and waters of the Volcano Bay Section (statistical areas 284-37 through 284-39) are closed to commercial salmon fishing through July 25 (Appendix B3). However, the portion of West Pavlof Bay Section south of Black Point (statistical area 283-26) may reopen to commercial salmon fishing on July 17 (Appendix B3). All other statistical areas are managed in accordance with each prescribed management plan.*

## **2020 MANAGEMENT PLAN**

*During the February 2019 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the BOF made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365) by amending subsection (d) that establishes the June fishing schedule. The first commercial fishing period began on June 6 at 6:00 AM and closed at 10:00 PM on June 8, a 64-hour fishing period for set gillnet gear only. Beginning at 6:00 AM June 10, all gear types were allowed to fish for an 88-hour fishing period that ended at 10:00 PM on June 13. That fishing period was followed by a closure of 32 hours for all gear types. The commercial salmon fishery reopened for 3 more 88-hour fishing periods, followed by closures of 32 hours each. The final commercial fishing period in June ended at 10:00 PM on June 28. Additionally, the BOF added a new subsection to the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365(g)) to close the waters of the Volcano Bay Section of the Southwestern District, the*



*Belkofski Bay Section of the Southwestern District, excluding those waters inside of a line between Vodapoini Point (lat 55°01.88'N, long 162°24.80'W) and Bold Cape (lat 55°01.24'N, long 162°16.40'W), and the South Central District to purse seine gear."*

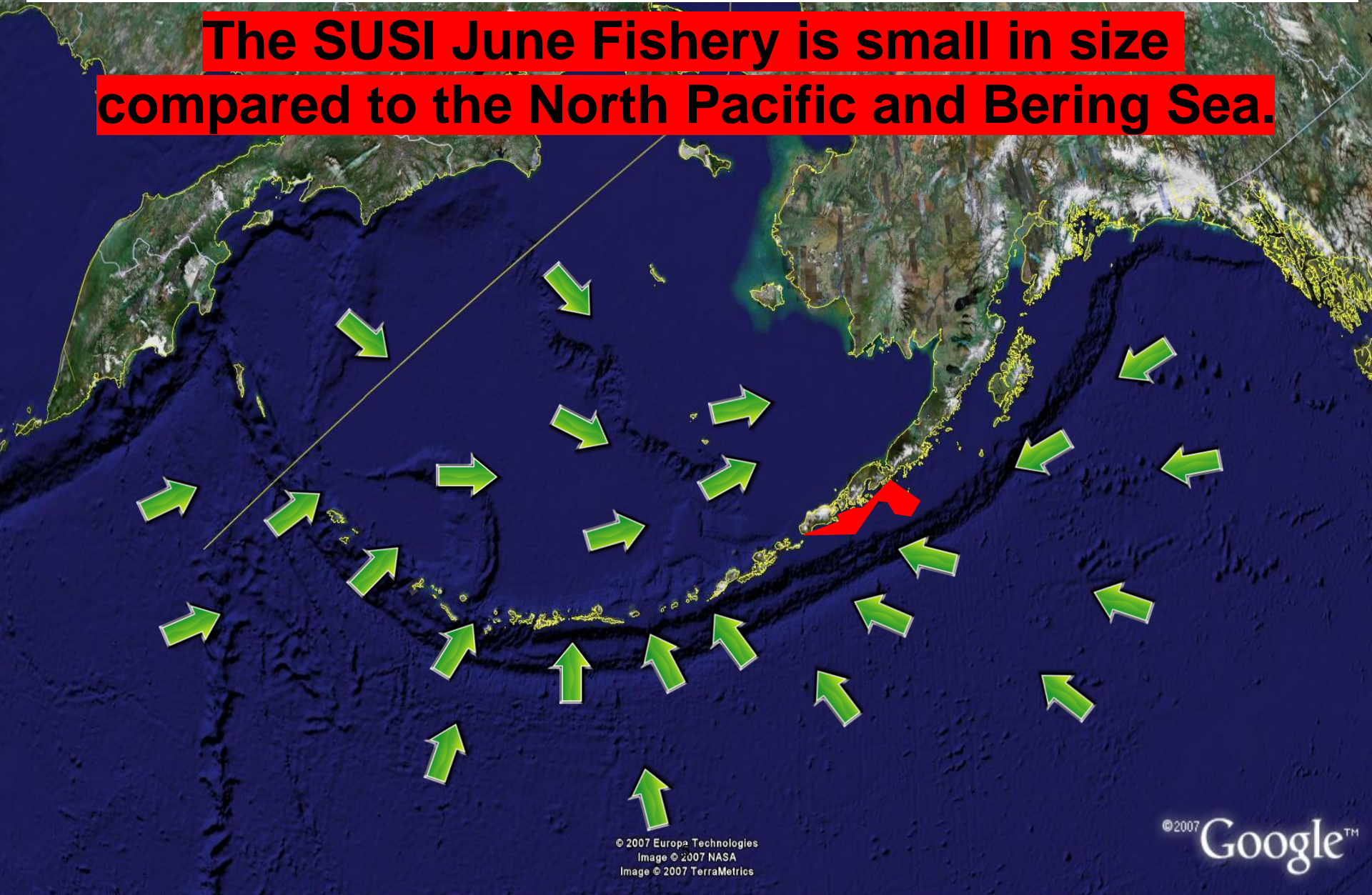
These regulatory changes most likely reduced the total harvest rate of sockeye in the South Peninsula on the Black Lake and Chignik lake reporting stocks in years beginning 2013 which are quantified on Figures 4 and 5.

The relative abundance changes in recent years may also contribute to a change in stock composition in the Shumagin Is salmon fishery which in turn would reduce harvest rates. For example, since the regulation change, the inshore Bristol Bay run has averaged 55.3 million sockeye (2013-2020) compared to 42.7 million during the WASSIP years while the Chignik total run averaged 1.8 million over the same time period and averaged 1.5 million during the WASSIP years.

Figure 6. Due to the fact the migration occurs on a vast area of the ocean the SUSI fishery doesn't have the capability of achieving high harvest rates on a given stock



**The SUSI June Fishery is small in size compared to the North Pacific and Bering Sea.**







## The June Fishery

Sockeye have been harvested at South Unimak and in the Shumagin Islands during the month of June for nearly a century. There's a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery is very valuable to its participants, to the Alaska Peninsula economy, and to the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past Boards have understood the value of the June fishery and have been committed to assuring us a viable sockeye harvest.

In 2004, the Board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that drastically cut our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The Board in 2004 recognized multiple problems with the prior plans – not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits – and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage Board members to review the findings prepared by the Board in 2004 (2004-229-FB).

In adopting these changes to the June fishery management plan, the key question the Board asked was whether the fishery would still perform within historical levels of harvest. The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The harvest of sockeye in the June fishery has ranged from roughly 1.95 million fish in 2017 to 660,000 in 2014, averaging 1,175,990 for the period 2010-2019.<sup>1</sup> During the same time period, the harvest of chum ranged from approximately 179,000 chum salmon in 2015 to 697,000 in 2009 and has averaged around 406,000 fish for period. These harvest levels are in the lower middle range of our historical catches for both species, and are smaller than the **error** in estimates of the size of the Bristol Bay sockeye and AYK chum runs after the season is over. Harvests of this magnitude are biologically insignificant.

The most recent season 2021 which is not included in the latest AMR produced the highest catch since at least 1979 for both sockeye and chum salmon. The SUSI June catch of sockeye was approximately 3.53 million and the catch of chum was about 1.17 million.

Nor did the 2004 plan result in any significant increase in the amount of effort. The number of permits fished remained relatively constant from prior years, and is considerably lower than the number of permits that fished during the 1980s and 1990s.

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<sup>1</sup> See South Alaska Peninsula Annual Management Report, 2020, Regional Information Report 4K21-12 (November 2021), at 64, Appendix B5.



Area M fishermen well understand the need to control their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet participates in “chum harvest pools” where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. But it must also be recognized that occasionally there will be years when the presence of chum in Area M waters is so continuous that they are hard to avoid, and that at some point, vessels need to fish if they are to maintain a reasonable sockeye harvest. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as by-catch to our harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery.

Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on a number of studies of the June fishery – including tagging; genetic stock identification (GSI), including the recent Western Alaska Salmon Stock Identification Program (WASSIP); and mark-recapture – certain conclusions have become clear:

1. Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock;
2. The chum salmon harvested in our fishery originate from a wide geographic area – Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, South-central Alaska – and only about a third are AYK summer chum;
3. Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are not even present in the June fishery; and
4. Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing. (Figure 6)
5. Chignik bound sockeye are present in June fishery harvests, however harvest rates are low. (Figure 4,5)

In sum, the June fishery has little biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting a viable fishery to be prosecuted there. Proposals seeking to further restrict the Area M fisheries are based on the myth that there is, or should be, a priority allocation for stakeholders closer to the stream of origin of salmon stocks. This attitude is in direct conflict with the position of the State of Alaska as signatory of the Pacific Salmon Treaty, which recognizes the intrinsic equity claim for fisheries near waters where salmon grow to maturity. The State vigorously maintains that there is at least as much, if not more right to harvest based on the idea of contributions to growth in contrast to

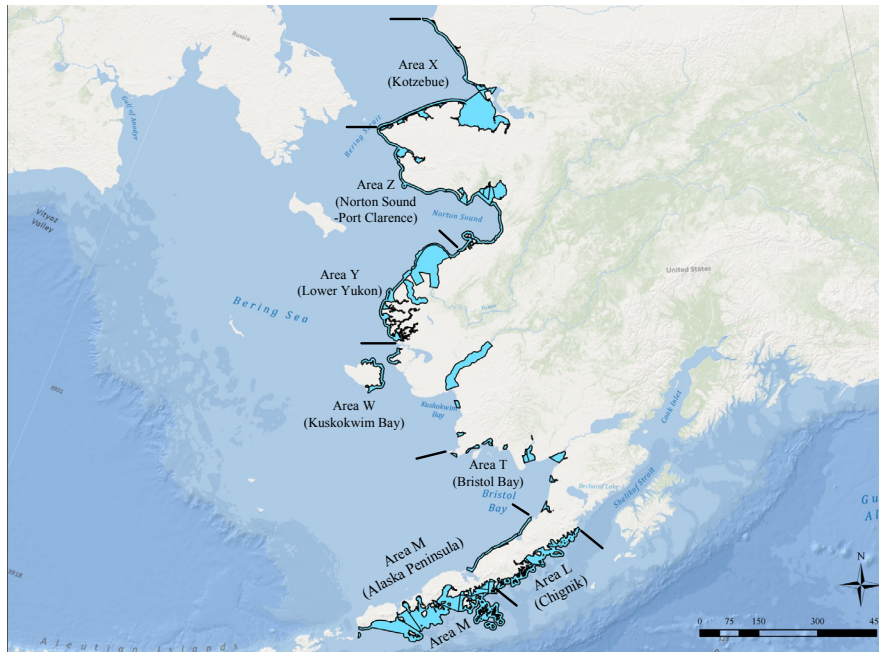


stream of origin. Within Alaska salmon are a common property resource that ‘belong’ to everyone, not just those nearest the stream of origin. The current June fishery management plan is working well, and data from WASSIP confirm the basis for prior Board actions and findings. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the nine-year study.

The following pages include the “***Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries***”, Which provides important background information concerning the study. Which was printed in the internationally recognized NPAFC newsletter.

# Western Alaska Salmon Stock Identification Program (WASSIP): Cooperation Among Stakeholders to Improve Understanding of Alaska Fisheries

By Erica Chenoweth, Eric Volk, and Bill Templin  
Alaska Department of Fish and Game (ADFG)



Map of Alaska with inshore and marine waters included in the WASSIP study highlighted in blue and ADFG salmon management areas.

coastal western Alaska, including state-managed marine and inshore waters on both sides of the Alaska Peninsula, Bristol Bay, the lower portions of the Yukon and Kuskokwim River drainages, Norton Sound, up around the east side of the Bering Strait to Point Hope, and Kotzebue Sound.

WASSIP's origins date back to the 1990s, when stakeholders and fishery regulators became acutely aware of the need for improved science-based information to better understand catch composition of diverse fisheries in western Alaska, so that informed decisions on allocations could be made.

**The Western Alaska Salmon Stock Identification Program (WASSIP)** is a unique collaboration among stakeholders and scientists to address long-standing questions about harvest patterns of chum and sockeye salmon in western Alaska fisheries. Born from frustration with widely divergent regulatory decisions based on limited and controversial data, WASSIP created a framework for representatives from affected stakeholders in western Alaska to collectively design a scientific study to address critical information gaps in a highly contentious commercial and subsistence fishing environment.

While engaged in the largest salmon genetics study ever conducted (collecting over 325,000 samples), we established a process where representatives of major regional fishery interests accepted responsibility for the design of scientific investigations that would inform regulatory decisions they must live with. Spanning more than eight years, WASSIP analyzed more than 225,000 tissues to determine stock-specific compositions, harvests, and harvest rates of sockeye and chum salmon in subsistence and commercial fisheries across a vast region of



Naknek gillnet sockeye salmon fishery in Bristol Bay. Photo credit: © ADFG used with permission





Picking salmon from the net on the Alaska Peninsula.  
Photo credit: Gene Conservation Laboratory, Lisa Fox, ADFG

Of particular concern to chum fishermen in the Arctic, Yukon, and Kuskokwim regions and to sockeye fishermen in Bristol Bay were catches of chum and sockeye salmon in regulatory Area M, on the North and South Alaska Peninsula. It was widely assumed that fisheries in Area M were intercepting excessive levels of salmon bound for distant regions. Previous

tagging and genetic studies for sockeye and chum salmon provided some useful information, but study limitations and a lack of comprehensive sampling hindered their utility.

Following the Area M Alaska Board of Fisheries meeting in 2004, tensions boiled over leading to pointed discussions among ADFG leadership and stakeholders to envision the kind of study that would provide the necessary fishery-specific information to understand stock-specific impacts from the many fisheries in western Alaska. Recent advances in genetic stock identification (GSI) provided a practical method for wide-scale salmon stock discrimination and the means to effectively address these questions.

In 2004, the ADFG and affected stakeholders began drafting proposals to rally financial resources and create a study design. In 2005, the federal government pledged financial support if a unified study design was agreed upon by all stakeholders. For more than a year, the fledgling group embarked on intense discussions to gain consensus on a plan. In 2006, a second advisory panel meeting was held, where elements of a draft Memorandum of Understanding (MOU) were discussed at length, and eighteen months later, an acceptable MOU was signed and adopted.



Subsistence users around Alaska.  
Photo credit: © ADFG used with permission





Advisory Panel representatives and ADFG staff at meeting in Anchorage, Alaska, fall 2012 (left). WASSIP results and presentation methods are discussed (right). Photo credits: Gene Conservation Laboratory, ADFG.

The challenge of reaching these agreements among many stakeholders with widely divergent interests should not be minimized. Signatories to WASSIP represent major fisheries interests and stakeholder groups, including local governments, corporations, and fishermen associations. The 10 signatory groups other than ADFG were Bristol Bay Native Association, Bering Sea Fishermen's Association, Yukon River Drainage Fisheries Association, Lake and Peninsula Borough, Association of Village Council Presidents, Kawerak Incorporated, Tanana Chiefs Conference, Aleut Corporation, Aleutians East Borough, and Concerned Area M Fishermen. WASSIP began with federal funding, which provided for just a single year of sampling in 2006.

The hard-won WASSIP MOU forms the foundation and framework of the program. It established the tripartite structure for WASSIP consisting of the (1) Advisory Panel (11 signatories, including Alaska Department of Fish and Game), (2) ADFG (department staff in genetics, stock assessment, and biometrics), and



Spring 2012 WASSIP Advisory Panel meeting. Photo credit: Gene Conservation Laboratory, ADFG

(3) an expert technical committee.

Advisory Panel members reviewed and approved elements of the study plan and, in addition, played a direct and tangible role in the development of specific technical and programmatic components. ADFG technical staff was responsible for all analyses and reporting.

The technical committee was composed of four internationally recognized scientists in the fields of genetics, population dynamics, biometrics, and salmon life history and migration. These were Drs. Milo Adkison from the University of Alaska, Robin Waples from NOAA Fisheries, and Tom Quinn and Bruce Weir from the University of Washington. They provided an independent source of critical technical insight into all methods and analyses that are the foundation of WASSIP data.

It was further stipulated that samples would be analyzed as a complete set; no analyses would begin until three years of samples had been collected and approved for both species; and no reporting of results would occur until all analyses for both species were complete. All project decisions were made by consensus; all meetings were open to the public; and all information was publically available.

An important expectation for WASSIP stakeholders was increasing public trust through an interactive process and ensuring that results were disseminated in an open and understandable way. In addition to public meetings, the primary mechanism for disseminating information was the [WASSIP website](#), where agendas, meeting minutes, and documents (including final reports, data files, posters, and maps) were posted and remain accessible today. A highlight of the website is the availability of technical documents, which trace the development of methods and techniques between ADFG, the Advisory Panel, and the expert technical committee, both in their original white paper form and in a more complete and readily citable report form.



Pelvic fin held out to show the axillary process on ocean bright salmon. The tissue is non-lethally sampled for genetic analysis.  
Photo credit: © ADFG used with permission



Dockside genetics sampling.  
Photo credit: © ADFG used with permission

From 2007 to 2009, WASSIP was fully funded by the State of Alaska and continued comprehensive sampling for both species. Agreement was reached on various technical components of the study, such as selection and development of genetic markers to increase stock resolution, methods to build the genetic baselines (the spawning stocks sampled to characterize genetic stock structure), and the best way to report results. For example, while Asian stocks of chum salmon are harvested in some western Alaska fisheries and Asian populations were included in the genetic baseline, the main concern of WASSIP was to describe the harvest of local western Alaska stocks. Therefore all Asian populations were reported as a single stock. Likewise, all North American populations from east of Kodiak Island were reported as a single stock. Further resolution is possible, but the decision was made to gain the greatest precision and accuracy for stocks important to WASSIP. For sockeye salmon, the scope of the baseline was even more specific and included only one group outside of the WASSIP area, described simply as "East of WASSIP".

Another early and important decision was to use single nucleotide polymorphisms (SNPs) as the marker type for the project due to the potential for high throughput analysis. ADFG was able to draw on an archive of tissues, DNA, and genetic markers available from throughout the ranges of both species made possible by collaborative research among U.S. scientists and scientists from Korea, Japan, Russia, and Canada. As an example, the collaboration made possible through PacSNP allowed for the development of the initial range-wide SNP baseline for chum salmon (See Seeb et al. 2008, Templin et al. 2012, Templin et al. 2014, and Seeb et al. 2011).

The main goal of WASSIP was to better understand the impact of all western Alaska fisheries on each of the two species and stocks of interest. In order to meet this overarching goal, genetic baselines were expanded, commercial and subsistence fisheries were sampled over several years to characterize temporal and spatial variability in stock contributions, and methods were explored and refined to maximize our capacity for stock discrimination in these fisheries. Meeting these lofty goals required an unprecedented level of effort on the part of all WASSIP



Gene Conservation Laboratory members often had to utilize helicopter transportation for baseline sampling.  
Photo credit: © ADFG used with permission





Dockside genetics sampling (upper left), sampling chum salmon (upper right), collecting fishery samples into a deep-well plate (lower left), and collecting baseline samples into a bulk sample bottle (lower right).  
Photo credit: Gene Conservation Laboratory, ADFG

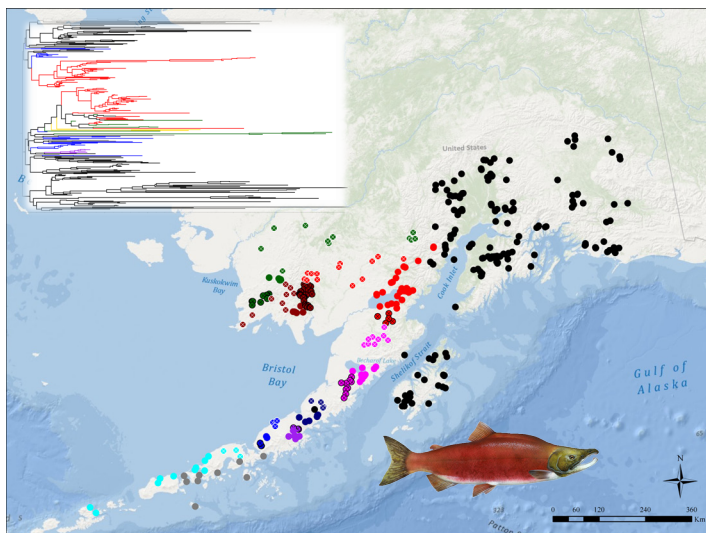
participants.

Complete WASSIP results are contained in nine reports. The foundation for the study is presented in the first five reports documenting fishery sampling, establishing genetic baselines for each species, and estimating stock-specific escapements for each species. Results of mixed-stock fishery analyses are contained in two reports for each species: one documenting estimated stock compositions from genetic analyses and one providing estimates of stock-specific harvest numbers and harvest rates for chum and sockeye salmon in WASSIP fisheries. The last two reports for each species are closely connected. The stock composition of fishery catches shows the percentage of harvest represented by various stocks in WASSIP fisheries. These stock percentages were applied to the number of fish harvested in the fisheries to determine stock-specific harvest numbers. Stock-specific harvest numbers for each WASSIP fishery were divided by the total run for each stock to determine harvest rates. It was essential that stock composition, harvest, and harvest rate results for each species be considered together to gain a complete understanding and full context of study results. All results are accessible on the WASSIP website (see <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.reports>)

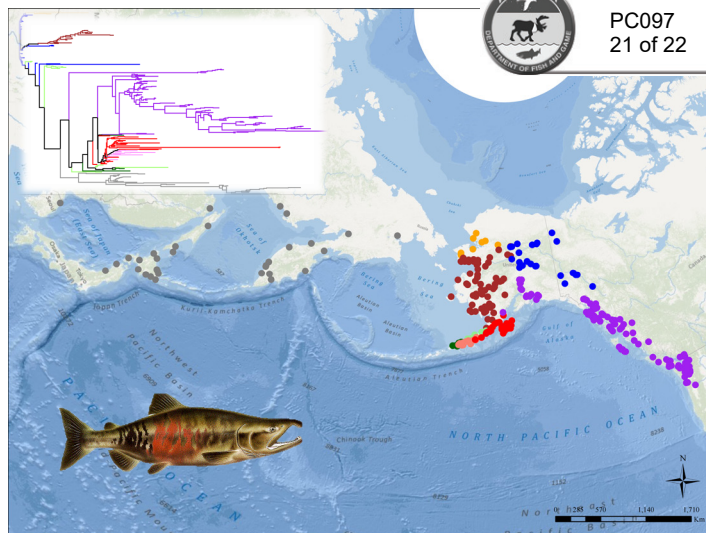


Lab staff working on extractions and genotyping.  
Photo credits: Gene Conservation Laboratory, ADFG





Sockeye salmon genetic baseline populations (39,205 sockeye salmon, 294 populations, 96 SNPs) and sockeye salmon genetic baseline structure. Genetic baselines are used to estimate the contribution of each stock to WASSIP catches.



Chum salmon genetic baseline populations (32,817 chum salmon, 310 populations, 96 SNPs) and chum salmon genetic baseline structure. Genetic baselines are used to estimate the contribution of each stock to WASSIP catches.

While results from the study cannot address all questions surrounding fishery impacts on chum and sockeye salmon stocks across this vast geography, WASSIP provided opportunity for representatives of major regional fishery interests to collaborate with technical experts on design of scientific studies to inform regulatory decision making.

The results of this large and comprehensive effort will serve as a springboard for continued collaborative investigations on these species both within Alaska and throughout the Pacific Rim, thereby increasing our knowledge of population structure, migratory behavior,

stock-specific harvests, and post-glacial colonization.

**References**

Templin W.D., C. Habicht, L.W. Seeb, J. E. Seeb, and E.C. Volk. 2014. Improvements to the range-wide genetic baseline for chum salmon through the Western Alaska Salmon Stock Identification Program (WASSIP) and PacSNP collaboration. NPAFC Doc. 1533. 8 pp. Alaska Department of Fish and Game. (Available at <http://www.npafc.org>.)

Templin, W.D., C. Habicht, L.W. Seeb, S. Sator, S. Abe, K. Warheit, J.Y. Park, J.E. Seeb. 2012. [Improved genetic stock identification of chum salmon through the PacSNP collaboration](#). NPAFC Technical Report No. 8:49.

**WESTERN ALASKA SALMON STOCK IDENTIFICATION PROGRAM (WASSIP):  
CHUM SALMON: IN WHAT FISHERIES WERE A GIVEN STOCK HARVESTED (HARVEST RATE)?**

**Reading These Figures**

- The vertical axis shows the harvest rate (%) of a given stock (reporting group) in each harvest year.
- The horizontal axis shows the three years of the study.
- The legend shows the color assigned to each of the stocks (reporting groups) potentially harvesting the given stock (reporting group).
- Figure 77 illustrates harvest rate estimates (dots) and collection site locations (dots) of those stocks from the WASSIP area of reporting group (Alaska from 2007 to 2009 for the Western Alaska Salmon Stock Identification Program). Color indicates population in the WASSIP area (reporting group).
- Each figure shows the results for a single stock (reporting group).

**Map of collections in the WASSIP chum salmon baseline.** Each dot represents a collection, and the color of the dot represents the reporting group membership of the collection.

**Legend:**

- Black
- Kotzebue Stock
- Upper Yukon Stock
- Chignik
- Northern District
- South Alaska Peninsula
- Chignik/Kodiak
- Coastal Western Alaska Stock
- Northern District Stock
- Northwestern District Stock
- South Alaska Peninsula Stock

This poster reproduces figures 77 to 83 (pp. 308-314) from the ADF&G Special Publication No. 12-25: *Harvest and Harvest Rates of Chum Salmon Harvests in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP) 2007-2009*. Harvest rate is the WASSIP commercial harvest divided by the total run within the WASSIP area for a given stock (reporting group) expressed as a percent. This report is available online at <http://www.adfg.alaska.gov/index.cfm?adfg=wassip-reports>.

Example of posters available online: <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.posters>

Seeb, J.E., S. Abe., S. Sato, W.D. Templin, S. Urawa, K.I. Warheit, and L.W. Seeb. 2008. PACSNP: Progress on the development and standardization of single nucleotide polymorphisms (SNPs) baseline for genetic stock identification of chum salmon. NPAFC Doc. 1138. 10 pp. (Available at <http://www.npafc.org>)

Seeb, L.W., W.D. Templin, S. Sato, S. Abe, K. Warheit, J.Y. Park, and J.E. Seeb. 2011. [Single nucleotide polymorphisms across a species' range: implications for conservation studies of Pacific salmon](#). Molecular Ecology Resources 11 Supplement 1:195-217.

## Further Reading

WASSIP final reports and citable technical documents: <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.reports>

Posters of results with explanations on how to read figures from WASSIP publications: <http://www.adfg.alaska.gov/index.cfm?adfg=wassip.posters>



**Erica Chenoweth** received her B.S. in Natural Sciences from the University of Alaska, Anchorage. She served as an intern at the Kachemak Bay Research Reserve in Homer, Alaska, specializing in

marine science education and assisted in field work on many projects. She was also a research and technology assistant on the National Science Foundation-funded Native American Science Curriculum project. Since 2012 Erica has been a Fishery Biologist at the Gene Conservation Laboratory of the Alaska Department of Fish and Game, providing laboratory and publications support on a wide range of projects. She particularly enjoys collaborating with authors locally and statewide to help make the WASSIP publications a success and creating public outreach material on the program. Passionate about science literacy, Erica loves the great outdoors and historical research.



**Eric Volk** received his M.S. in fisheries from the University of Washington and his B.A.

in Biology from Cornell University. He has over 30 years of experience working with salmon for the states of Washington and Oregon and has been the chief salmon fisheries scientist with the Alaska Department of Fish and Game since 2008. His research interests have centered on determining stock identification and life history variability in salmonids and lamprey using otolith and statolith microchemical and microstructural techniques. Eric's work includes publications regarding pioneering methods leading to the common practice of thermal marking used to identify different hatchery salmon stocks today. Eric is a member of the NPAFC Working Group on Stock Assessment.



**Bill Templin** received his Master's Degree in Quantitative Fisheries Science at the University of Alaska Fairbanks modeling the interaction of migration, harvest, and escapement in a pink salmon

fishery in Prince William Sound, Alaska. He has since worked in the field of quantitative and applied fish genetics for 20 years, the last seven as laboratory director and principal geneticist for the Alaska Department of Fish and Game. The laboratory investigates population structure, stock composition of fishery harvests, parentage of hatchery individuals and migratory behaviors. Bill has also been involved in developing large-scale baseline datasets based on allozyme, microsatellite, and single nucleotide polymorphism markers at multiple scales. He is a member of the NPAFC Working Group on Stock Identification. Outside of work, Bill enjoys hiking, hunting, discussing philosophy and theology over beer, martial arts, and riding motorcycles with his wife.



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February 15, 2022

Dear Board of Fish,

I have been a guide on the Kenai for 8 years now, and even in my short time on the river, I have noticed a noticeable decline in numbers, as well as size of our Kings. Something needs to be done to help our states most iconic fish, and lowering the escapement goal to allow more commercial harvest of sockeye is not the answer. This decision would impact more kings than the run can afford. The state should be doing everything in their power to put more kings on the gravel

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

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

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.

Connor Murphy  
38745 Self St  
Sterling



Dear Members of the Board,

Our membership has long had an interest in the PWS spot prawn pot fishery and feels modern management of the fishery has been limiting our ability to participate in this fishery without justification. It's important to point out that the current management strategy, which has only been in effect since 2010, was a drastic departure from the historical fishery in season timing and gear restrictions. These changes in the management strategy have turned what was once a small profitable shoulder season fishery for many local commercial fishermen into a glorified sport fishery that is largely participated in by hobbyists with little or no interest in making a profit. Since the implementation of the current management strategy management has used its ability to adjust pot limits and opener lengths to exclude participation by Cordovan fishermen despite our protests. We ask the board to question whether the current management is in line with the department's stated goal to "optimize economic benefits from fish and wildlife resources".

#### **Proposal #237 Support**

Current reporting rate and accuracy is unacceptably low in this fishery especially considering the ghl is often exceeded. I would encourage the Board to require some sort of timely reporting so that this fishery can be more actively managed to prevent overharvest.

#### **Proposal #238 Oppose**

#### **Proposal #239 Modify**

Pot limits per vessel has long been used in commercial, subsistence, and sport harvest in Alaska to limit harvest potential. Recently Shrimp fishermen in PWS have started exploiting this "spare pot" loophole in order to drastically increase the number of pots fished per vessel. Now vessels are regularly heading out with multiple permit holders aboard and multiple limits of shrimp pots which they call "spares". Once the vessel sets one permit holder's limit worth of shrimp pots they simply add marked buoys to their "spare pots" for the next permit holder on board and go set those. In this way they are capable of fishing far more gear per boat than was ever intended by the regulations.

We encourage the board to take this opportunity to clarify the regulation which already clearly states a maximum of 5 pots per vessel to include any spare pots aboard the vessel.





### **Proposal #240,#242,#246 Support**

The current spot prawn management plan does not differentiate sport, personal use and subsistence harvest in the TAH. Allowing sport and personal use harvest when the population is depressed below that which could support a commercial fishery should not be allowed as these user groups have the same priority under law. Noncommercial user group is the largest user of spot prawns in PWS and is often incapable of being managed to not exceed their GHL. Proposal 240 would be the preferred solution.

### **Proposal #247 support**

The first gear limit set on this fishery was in 1990 with a limit of 150 pots. When the fishery reopened in 2010 the current regulation with a limit of 100 pots was put into place. However, this modern harvest strategy also gave the department the ability to set pot limits yearly based on the number of registered participants. This was a mistake, adjusting gear limits based on registered participants is not a common practice in other Alaskan commercial fisheries and has no reason to be done here. Knowing a set number of pots gives some consistency to the daily harvest a fisherman can expect to achieve every year they participate. By lowering pot limits the department decreases the daily harvest potential of participants and therefore increases the cost to participate in this fishery. The department is incentivised to give participants the smallest number of pots they can as it slows the pace of the fishery and reduces participation thereby making management easier. The board should set a minimum gear limit like it has done in nearly every other fishery in Alaska.

The 2021 PWS Spot prawn fishery was a perfect example of the department's unwillingness to liberalize pot limits. In 2021 the fishery was open for a total of 112 days between April 15th and August 28th. The fishery opened with a 30 pot limit similar to the previous years but the CPUE and effort was much lower than previous years. Despite this slow start the department still had a 12 day closure from April 28th to May 10th and kept a pot limit of 30 pots for the second opener until May 15th. After May 15th they raised the limit to 40 pots for the rest of the season. The department ignored the existing management plan's requirement to set pot limits based on participation, cpue and ghl. This arbitrarily low pot limit resulted in a 124 day long season to harvest a 70,000lb ghl compared to 2020 when a 68,100lb ghl was harvested in 24 days.





According to CFEC the average gross earning per active permit for 2020 was \$5,466 in 2019 it was \$6,565. These would be fine averages if season length was 1-2 weeks. During a one week season the average participant could turn a profit. However, managing the season to last from 24 days in 2020 to 124 days in 2021 makes the ability of the average participant to pay expenses extremely unlikely.

Southeast Alaska manages spot prawn districts with individual GHL's comparable to PWS and does so in a much more efficient manner. District 1 and District 2 in southeast are both comparable to PWS in that they have approximately 50,000lb GHLs. These areas are managed with participants allowed to use 140 pots and season length is usually around 10 days.

#### **Proposal 248 Support**

This fishery has been underutilized for at least the last 20 years with a good portion of the ghl going unharvested every year due to low participation. An earlier start date would make rigging up and going before salmon season more viable for participants.

#### **Proposal 250 Support**

Before the 2010 management plan this fishery had always opened earlier than April 15th the most recent opening date before the closure in 1990 was March 15th. We are simply asking for the more historic fishing season dates. Gear conflict with noncommercial users is becoming more and more of an issue in the commercial spot prawn fishery and an earlier start date would allow the commercial fleet to harvest their ghl before many sport boats start fishing in the spring.

For fishermen that fish the Copper River the spring shrimp season is a good way to diversify and make a little money before the Copper opens on May 15th. The later opening date of April 15th gives them a smaller window to participate and then switch over to salmon fishing. To make matters worse the department has also begun making a habit in the spot prawn fishery of having a long closure during the last week of April, first week of May which results in an additional reduction of fishing opportunity for these participants.

In 2021 the fishery opened April 15th but then had a 12 day closure from April 28th to May 10th before reopening until August 28th. This was done with no justification as the majority of the GHL was still remaining and the harvest rate was slow. That



excessive closure eliminated any fisherman who also fishes the Copper river's ability to participate in the second opening and unnecessarily increased the expenses for shrimp fisherman and processors who had to leave their boat and crew idle mid season.

### **Proposal 251 Oppose**

We are in support of most of this proposal except for Section F which would make it illegal to fish a floating processor in these shrimp fisheries. Small scale floating processors have been harvesting in this fishery since it reopened in 2010 and should not be excluded. The department claims a similar regulation exists for the shrimp fishery in Registration Area A which is true. However, registration A put that regulation in place in the 1990s due to their inability to track harvest on floating processors in a timely fashion. This is not the case in modern PWS with plenty of cell phone coverage. Cell and Sat phones make daily reporting easy and with that reporting there is no reason to ban floating processors from participating.

The best quality and highest value shrimp are frozen at sea and allowing floating processors to work with other fishermen to freeze their own catch as well as others only benefits this fishery. The harvest volume in this fishery is so low it is extremely hard to make freezing at sea viable especially if you ban the ability to freeze multiple permit holders catch on one boat. Banning floating processors from being able to also participate in this fishery will do nothing to protect the species; it will only make an already economically difficult fishery even more so.

### **Proposal 252 support**

Allowing catcher boats to also act as tenders is allowed with salmon under the transporter regulation and that should be mirrored in shrimp fisheries. Fresh shrimp needs to be frozen or sold within three days of harvest. It makes no sense for 50 shrimp boats to all run back and forth to town every three days when they could simply consolidate their catch on one boat. The low volume in these fishery's make it difficult to afford a dedicated tender vessel and consequently this would greatly increase the profitability of this fishery. This would also increase the ability for processors from further ports such as Cordova to compete in the market which could drive prices paid to fishermen up.

### **Proposal 253 Support**

This bycatch regulation needs to be changed as it is foolish to be required to throw shrimp overboard as deadloss. The department's own data shows no harvest of spot



shrimp in this fishery since 1996 yet they oppose this proposal due to it increasing spot harvest? Currently a fisherman, if they wanted to, could throw every pink shrimp they catch overboard and it would not contribute to their bycatch allowance. The idea that fishermen currently keep low value pink shrimp and throw spot prawns over is ludicrous. This regulation will in no way increase spot harvest; it will simply help stop the wanton waste of pink shrimp by not requiring them to be discarded dead whenever they are harvested in excess of 20%.

### **Proposal 254 Support**

The department has the ability to put observers on shrimp trawl boats and has in the past. The department currently bottom trawls this area frequently to do tanner crab surveys. If it's ok for the department to trawl this area targeting tanner crab why shouldn't commercial fisherman be allowed to trawl it to target shrimp as has been done in the past? If evidence of tanner crab mortality was to result from this small scale fishery we would of course ask for it's closure. There is little effort in the shrimp trawl fishery and an expansion of area closer to Cordova may encourage participation.



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March 09, 2022

Dear Board of Fish,

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

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

The 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.

Corey Jellison