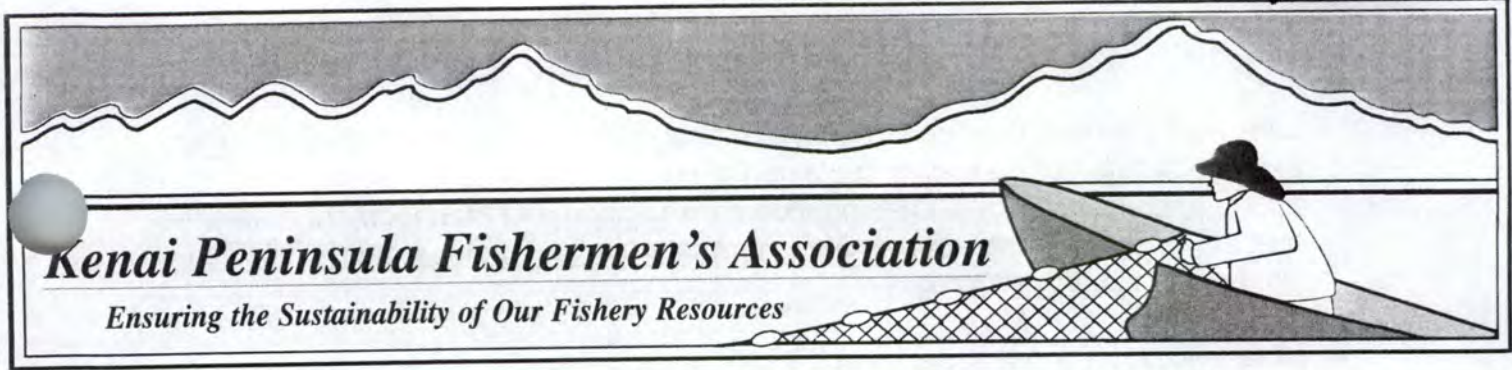


RC51 



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March 18, 2013

State of Alaska
 Department of Fish & Game
 Board Support Section
 Karl Johnstone, Chair
 PO Box 115526
 Juneau, AK 99811-5526

Re: Board Generated Proposal 249

Dear Board of Fisheries members,

Kenai Peninsula Fishermen's Association (KPFA), offers the following comments in response to Board Generated Proposal 249 over Agenda Change Request (ACR) 4:

Background Overview: ACR 4 proposal (no action/did not meet ACR criteria) submitted by Kenai River Sportfishing Association (KRSA) over an Agenda Change Request to the Board of Fisheries, Work Session - October 9-10, 2012.

- Clearly biological assumptions and allocation allegations premised in ACR 4 over recent escapements are not supported by the new Alaska Department of Fish and Game's DIDSON escapement goal and run reconstruction report on Kenai River Late-run Chinook salmon. In addition, the proposed additional changes presented by KRSA attempt to completely undermine three separate developed management plans in regulation established for decades (Kenai Late-run King Management Plan, Kenai River Late-run Sockeye Management Plan, and Kasilof River Salmon Management Plan). In short, the proposed measures promulgate an increased escapement goal range not based on maximum sustained yield analysis but theoretical argumentative positions for significant reallocation and modifications to the 5 AAC 21.359 which is contrary to 5AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries:
 - (c) (2) (B) "salmon escapement goals, whether sustainable escapement goals, biological escapement goals, optimal escapement goals, or inriver run goals, should be established in a manner consistent with sustained yield; unless

otherwise directed, the department will manage Alaska's salmon fisheries, to the extent possible, for maximum sustained yield."

And violates; (d) (2) (E) "provide conservation and management measures that are necessary and appropriate to promote maximum or optimum sustained yield of the fishery resource."

- Note: allocation consequences in KRSA's proposal would significantly alter Upper Cook Inlet Management Plans; place significant sockeye salmon reallocation to the Drift fleet by time and area; will certainly impede the Department's ability to manage and distribute sockeye salmon escapements into the Kenai River system; along with increased harvest level affect on sockeye salmon stocks bound to other Districts.
- The criteria outlined for Agenda Change Requests clearly was not met in ACR 4 (no action) and certainly KRSA's proposal describes and seeks further increased allocation measures which are well beyond the scope of the Task Force and thereby violates the "allocation neutral recommendation" standard – as outlined by the Task Force Board of Fisheries Co-Chairs during the Task Force held meetings. KRSA's proposal is instead, a tri-annual Upper Cook Inlet 2014 regular cycle meeting proposal.

Respectfully,

Robert V. Williams
President