

7/24/2012

ALASKA DEPARTMENT OF FISH AND GAME
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Attention: Chairman Johnston

Subject: Emergency Petition Request Letter

Dear Chairman Johnstone;

I am Ben Allen and am a member of the Matanuska Susitna Borough Fish and Wildlife Commission. Additionally, I own and operate a full time fishing guide operation based out of Wasilla. The purpose of this letter is to address emergency order 2S-18-12: *Opening commercial fishing with drift gillnets in Drift Area 1 and the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict on Saturday, July 21, 2012, from 7:00 a.m. until 10:00 p.m.*

Justification of this emergency order, (*The escapement rate of sockeye salmon into the Kenai and Kasilof Rivers is proceeding at a rate greater than that needed to assure optimum escapement levels. In order to reduce the rate of escapement, additional fishing time in the area described above is warranted.*) does not comply with the guidelines and standards set by the Board of Fisheries. The above emergency order does not address the status or forecast of northern Cook Inlet salmon stocks, including the sport fish use priority Coho salmon.

Emergency order 2S-18-12 is noncompliance with the Board of Fisheries Policy that attaining the low end of a salmon spawning escapement goal be a management priority above preventing over escapement.

I am requesting a change in management practices that:

1. Conserve Northern District Coho Salmon Stocks.
2. Adhere to the guidelines set by the Board of Fisheries

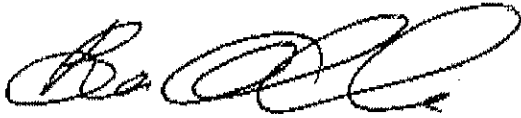
Secondly I am requesting that the Board of Fisheries prohibit the Department from implementing additional emergency orders that will have a negative impact on the Northern District Coho Salmon stocks.

I am concerned with the recent historical and current status of the Northern District Coho Salmon. The Little Susitna River, the most heavily utilized Coho Salmon sport fishery in the Matanuska Susitna Valley is on the brink of Stock of Concern status. Previous poor returns to the Deshka River are a strong indication, that if the Department had established an escapement goal for the Deshka River, that the Deshka River too could be on the brink of a Stock of Concern status.

Current indices suggesting a poor return of Coho Salmon to the Matanuska Susitna Valley include:

1. Little Susitna River and Deshka River weir data.
2. Very low numbers of Coho being harvested in the commercial fishery.
3. Extremely poor catch rates by all local guides and fishermen.
4. Low numbers of Coho accounted for on the fish wheels located on the lower Susitna River.

Your influence to change current management practices and conserve Northern Cook Inlet Coho Salmon is greatly appreciated.



Ben Allen

Matanuska Susitna Borough Fish and Wildlife Commission Member

907-715-1095

fish@millersriverboat.com