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Non-Regulatory Proposals

1. List of non-regulatory proposals
   a. Bruce Schactler, Deliberation process for Kodiak management plans, EF-F19-091.
   b. Nancy Hillstrand, Hatchery straying actions, EF-F19-095.
   c. Nancy Hillstrand, Hatchery straying actions, EF-F19-097.
   d. Thomas Dalrymple, Kenai River sockeye actions, EF-F19-118.
   e. Mike Frank, Salmon enhancement management, EF-F19-126.
   f. Fairbanks Fish and Game Advisory Committee, Salmon enhancement management, EF-F19-128.
   g. Fairbanks Fish and Game Advisory Committee, Salmon enhancement research, EF-F19-129.
   h. John McCombs, Upper Cook Inlet meeting location, HQ-F19-037.
   i. Mike Adams, Kenai River SEG and coho salmon management plan recommendation, HQ-F19-050.
   j. Mike Adams, Upper Kenai River king salmon SEG and sonar site recommendation, HQ-F19-053.
   k. Mike Adams, Upper Kenai River sockeye SEG, management plan, and sonar site recommendations, HQ-F19-054.
   l. Joe Hanes, Test fishery receipts, HQ-F19-066.
   m. Kodiak Salmon Workgroup, ADF&G research and reporting recommendations, HQ-F19-127.
   n. Kelsey Deiman-Symanski and Gary Deiman, Kasilof River monitoring recommendation, HQ-F19-136.

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PROPOSAL XXX

5 AAC .

" The Alaska State Board of Fisheries (Board) shall, during all, "on record" discussions and official deliberations on any Kodiak Area Salmon Fishery proposal, document and refer to the specific portion and or line item of the Kodiak Area Management Plan and Harvest Strategy that the proposal of discussion seeks to modify in any manner.

The Board shall also specifically cite and take into consideration the economic impacts to the Kodiak area residents and participants of the fishery when making changes to the Kodiak Area Salmon Management Plan and Harvest Strategy.

What is the issue you would like the board to address and why? The Kodiak Area Salmon Management Plan is likely the most complicated of salmon areas in the State to manage in season due to the need to simultaneously manage 5 species, though separate and significant run timing variables, from 600+ streams and rivers that stretch over several hundred miles. The Kodiak Area management plans extend over a span of 4 months and regulate Seine, Set Gill Net and Beach Seine gear.

Modifications to any of the mature but complicated regulatory management plans require deep and specific understanding of the plan's content. Board of Fisheries members and surely new members, working through an agenda packed and often contentious meeting may find it challenging to remember all the intricacies presented in the KAMP.

Such complicated and mature managements plan may take days and much outside research and discussion to begin to truly understand them in their entirety and to the degree needed to accurately address the proposal at hand. The time and opportunity for a board member to get through this kind of research and discussion may not be available in a realistic timeline. A plan to insure the best communication and therefore the best and most accurate deliberation is and has long been needed in this unique SOA process.

PROPOSED BY: Bruce Schactler (EF-F19-091)

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PROPOSAL XXX

5 AAC 39.223. Policy for statewide salmon escapement goals.

Regain our Wild Fish Priority
Bring the laws into compliance for the purpose of the conservation and development of the fisheries resources AS 16.05.221.

Notify the public, the MSC and the RFM that because of hatchery strays escapement goals are no longer reliable.

Crack down on Regional Planning Teams and aquaculture corporations to mark all their fish, AS 16.05.251(5) cease increases, and cease remote releases to re-claim reliable escapement goals.

Defective justification, delays and inaction to control straying must cease by the department to allow this damage to continue.

(7) prepare a scientific analysis with supporting data whenever a new BEG, SEG, or SET, or a modification to an existing BEG, SEG, or SET is proposed and, in its discretion, to conduct independent peer reviews of its BEG, SEG, and SET analyses;

Harvest these feral fish AS 16.10.440.

Designate specific areas for harvest by Cook Inlet seiners to target and intercept these feral fish when detected and before they enter Kennedy Entrance.

Costly monitoring must be paid for by aquaculture Associations.

What is the issue you would like the board to address and why? The high levels of hatchery straying in LCI masks the reliability to enumerate and estimate the very crown of ADFG sustainable management, the escapement goals. Until Kodiak gets a reliable otolith marking program we will have no idea how many "no marks" otoliths are actually Kitoi Bay Strays. Straying obscures the mandated “management consistent with sustained yield of wild fish stocks” AS 16.05.730.

ADFG and the BOF are charged with the “duty to conserve Alaska's salmon fisheries on the sustained yield principle” “for which the department can reliably enumerate (BEG) or estimate (SEG) salmon escapement levels as well as total annual returns;” “for aggregates of individual spawning populations with similar productivity and vulnerability to fisheries and for salmon stocks managed as units”;

Unreliability of escapement goals and allowing magnitude predation from excess straying in these ecosystems must not be tolerated.

PROPOSED BY: Nancy Hillstrand (EF-F19-095)
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PROPOSAL XXX
5 AAC 40.005. General ?.

Control measures are needed 16.05.251(8)
1. The solution to the "effect of this excess predation and competition" is to "exercise control measures necessary to protect the resources of the state" AS 16.05.251(8)
2. Bring the laws into compliance for the purpose of the conservation and development of the fisheries resources AS 16.05.221 ranking wild fish as the priority
3. Designate areas for Lower Cook Inlet seiners to intercept these feral fish before they enter Kennedy Entrance into Cook Inlet, Kachemak Bay and the outside coast. AS 16.10.440.
4. Classify stray hatchery fish as "predators" 16.05.251 (6)
5. set apart sanctuaries in the waters of the state in LCI and the GOA wild river systems located within this call for proposals 16.05.251(1)
6. Requesting expansion of standardized otolith monitoring and enumeration programs in On the west side of Cook Inlet and outer coast of Gulf of Alaska these
7. Request the Kitoi Bay hatchery on Afognak Island to move on their otolith marking and monitoring program
8. Establish a moratorium on Permit Alteration Requests and remote Releases in LCI and Kodiak
9. Fine and cite hatchery operators for waste of salmon AS 16.05.831**.**
10. Request expansion of standardized otolith monitoring and enumeration programs in On the west side of Cook Inlet and outer coast of Gulf of Alaska these
11. Request the Kitoi Bay hatchery on Afognak Island to move on their otolith marking and monitoring program
12. Establish a moratorium on Permit Alteration Requests and remote Releases in LCI and Kodiak
13. Request a moratorium for which there is insufficient biological and resource management information necessary to promote the conservation and sustained yield management of the fishery, threatens the conservation and the sustained yield management of the fishery resource and the economic health and stability of commercial fishing; 16.43.225 **(3)**

What is the issue you would like the board to address and why? ADFG has documented unacceptable high levels up to 88% inter-regional straying of PWS enhanced salmon stocks into wild salmon stocks of Lower Cook Inlet the Gulf of Alaska's "essential habitats in marine, estuarine, and freshwater ecosystems". Significant and sanctuary stocks are affected.

The Genetics Policy Statement
B. Inter-regional: Stocks will not be transported between major geographic areas: Southeast, Kodiak Island, Prince William Sound, Cook Inlet, Bristol Bay, AYK and Interior.
These "essential habitats include spawning and incubation areas, freshwater rearing areas, estuarine and nearshore rearing areas, offshore rearing areas, and migratory pathways;" 5 AAC 39.222 (c)(1)(A)(iv)

In addition to genetics and fitness concerns, colonization from straying also creates 'the effect of excess predation and competition", disrupting the food web of the established ecosystem processes in these essential habitats of legislatively designated Kachemak Bay, Critical Habitat Area; and State Park; NOAA Habitat Focus Area; and National Estuarine Reserve and the GOA Coast. 16.05.251(8)

Art VIII Sec 7; AS 38.04.070; AS 41.21.131; AS 41.21.990; AS 16.20.590; AS 16.21.500; AS 16.20.580; AS 16.05.020; AS 16.05.050; AS 16.05.255; AS 16.20.520: AS 16.20.530; 5AAC 95.610

These Strays are a feral biomass that does not cease eating when they swing in to these essential habitats of Cook Inlet and GOA. Daily consumption calculated at 3-7% of their biomass, displaces, and competes directly with indigenous wild salmon, standing stocks of rearing shellfish, sand lance, herring and other forage species, in nearshore enclosed waters of Cook Inlet.
This is an invasive, affecting the desirable high valued wild species and intercepted poundage of our wild fisheries in the Cook Inlet and Kodiak Region.

PROPOSED BY: Nancy Hillstrand (EF-F19-097)
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PROPOSAL XXX

5 AAC Multiple/Various.

Were the state to consider completely novel ideas (perhaps from outside?) and thereby address its decades-old Kenai River "Problem" starting with a totally clean slate the below just might be representative of the type of entirely-new/fresh thinking which could help achieve the following over-arching goals:

1) Ensuring an adequate food supply to the residents of Alaska without encouraging waste.
2) Reversing the continued decline of the Kenai's *very large* King Salmon population.
3) Returning the size of the Kenai River Sockeye run to the upper end of its full potential.
4) Maximizing the economic value of the Kenai Sockeye fishery to the State and its residents alike.
5) Ensuring a healthy and profitable guided fishing industry.
6) Revitalizing commercial fishing - and fish processing - within the town of Kenai.
7) Reducing both the costs and conflicts related to enforcement of the Sockeye fishery.
8) Ensuring tourists can enjoy Alaska's resources without encouraging them to exploit them.
9) Relieving the environment of unnecessary risks, not to mention predictably-certain damage.

Each and every one of the below (intentionally random) "untried squares" endeavors to either raise an issue or otherwise offer a contribution/solution in support of the above goals, even as both lists are quite admitted woefully incomplete and abundantly flawed. Again, I cannot provide many - nor perhaps any - of the "answers" as I too am much too entrenched. That said, what follows constitutes my best efforts to stir up some *radically* helpful thinking:

Square 3 - Value of Resource: First and foremost it should be formally recognized that the flesh ***and eggs*** of an exceedingly well-cared-for 6-7lb Kenai River Sockeye salmon are worth $75 or more, FOB Kenai. That being so, this resource has a potential annual value of approximately $250 million to the State of Alaska and its citizens - or 15% of our current budget deficit - assuming an easily-achievable run size of 5 million with an escapement of 1.5 million. In short - and all the more so given current threats to Bristol Bay's future - the Kenai River's Sockeye run is an issue deserving of extensive concern and study.

Square 7 - Method of Take - Commercial: Fishing for salmon anywhere but in the river that they have returned to is economically and environmentally questionable. The very best product - harvested at the lowest possible cost - is that which is caught *one-by-one*, bled while still alive, gutted, iced and delivered immediately to a processing plant. The idea of set-netting and/or drifting for salmon in the Inlet/ocean is ludicrous given the economic and environmental costs of bycatches, lost "ghost" nets, burnt fuel, spilled engine and hydraulic oils, not to mention the maintenance required by ocean-sized vessels.

Square 10 - Non-Commercial Harvest Methods: The idea that a Sockeye can be a "sport-caught" fish is dishonest. With rare exception even a "legal" red is simply a fish which has been snagged in the mouth, most often with a bare hook. That being so the State wastes the resources of its enforcement officers and courts as well as needlessly harasses (or far worse) citizens and tourists alike by caring ***at all*** about the method of take when it comes to non-commercially-caught reds. The only legitimate issues with regards to non-commercial red fishing involve fishing periods and locations in the name of resource and habitat protection coupled with *Total/Annual Harvest Limits;* with the enforcement of the latter critical given the potential for subsequent sales, bartering and "gift giving" outside of the jurisdiction of Alaska, if not the United States. One only need watch the heavily-laden FedEx/UPS cargo planes struggle skyward during the dip-net fishery to gauge the enormity of the annual loss to Alaska's economy, if not way of life.

Square 12 - Non-Commercial Harvest Limits - Residents: Given the exceedingly-high commercial value of Alaska's sockeye salmon great lengths should be taken to ensure they neither rot in freezers nor enter the stream of commerce. To that end every person in Alaska who qualifies for a PFD should be allocated a reasonable number of reds annually solely for personal harvest and consumption. (Just for the sake of an example let's say 30 for every adult and 20 for every child under 16.) To that end each "qualified" Alaskan resident could *in person* obtain their allotted number of single-use locking red tags (to be used solely by them) at any F&G office (and/or contract location) during the months of November - March.

That done Alaskans could fish for as many reds as they desire at any (otherwise allowable) place by any allowable method/means they wish - including dip-netting and/or outright snagging - so long as they possess as-yet unused tags. At the moment a red is landed the tag will be inserted through the gills. Until the fish is removed from the drainage where it was taken that tag will remain in place. Putting that another way every fish which is either in a boat or on a bank will bear a locking tag, and anyone fishing for Sockeye salmon - by way of any method - best be carrying a supply of unused tags.

Square 14 - Non-Commercial Harvest Limits - Non-Residents: Every "non-PFD" person who visits Alaska will have the opportunity to purchase Sockeye tags of a similar design/operation as above. The cost will be relatively low - perhaps $5 per tag - for the first five (5) tags. This will allow visitors the opportunity to go out on a charter and/or bank fish for reds while discouraging the current epidemic of "exploitative" tourism; largely by way of "snow-birding". Should someone wish to come to Alaska every summer primarily to harvest its fish then they will have the opportunity to purchase additional tags at the rate of $15 for the next ten (10) tags and $25 for a final ten (10) tags; with all such fees still being graciously below the actual market value of the resource which they are intent on removing from the State and its people.

Square 17 - Commercial Fishing Times, Locations and Restrictions - Transition Step One of Three Drift Fishing in Cook Inlet proceeds as currently managed/planned with the exception that any King Salmon over 24" long which is caught in a set net either be "rolled" (as in "immediately released alive/unharmed) or donated to a homeless and/or veterans organization if/when clearly not viable.

Set-Net Fishing from Beach Sites in Upper Cook Inlet proceeds as currently managed/planned, with the exception that any King Salmon over 24" long which is caught in a set-net be "rolled or donated" as per above.

Outside Set-Net Fishing in Upper Cook Inlet is immediately converted into an in-river "Dip-Net" Fishery. This eliminates the possibility of adding to the current supply of lost or "ghost" 210' nets floating around in the Inlet/Ocean, it eliminates interference with coastal sport fishing in Upper Cook Inlet and lastly it ends the capture/killing of Kings bound for the Kenai River by this (now-former) Outside Set-Net Fishery. In addition it provides local canneries with a reliable supply of fresh, un-bruised, live-bled, immediately gutted/iced product of the highest economic value possible; suitable for shipment to the very finest restaurants and fish markets in the world. Openings would be Mondays and Thursdays, 7:00AM to 7:00PM until escapement goals are met after which this method of harvest would be used - in conjunction with the two other commercial fisheries - to ensure "maximum sustainable yield".

Meanwhile, to reduce congestion among boaters at/near the mouth of the Kenai – as well as to avoid potential conflicts with regards to the harvesting of the resource itself - no "guided" (commercial) dip-net fishing would take place on the days during which the "Permitted" dip net fishery was open. In addition (even if perhaps quite obviously) no King Salmon longer than 24"

could be retained by ***any*** dip-netter who is fishing in the Kenai River; whether commercial, subsistence, guided, personal use or otherwise.

Square 23 - Commercial Fishing Restrictions - Transition Step Two of Three

Should the stock of large (36"+) Kenai River King Salmon ***fail*** to drastically improve (let's say back to 1970 levels) within 2 to 3 years then the Beach Set-Net Sites will be similarly converted to in-river Dip-Net fisheries. This possibility will help further ensure that this "heavily-invested" fishery will elect to "roll" any/all viable medium to large Kings which are caught in their nets.

Square 27 - Commercial Fishing Restrictions - Transition Step Three of Three

Should the stock of large (36"+) Kenai River King Salmon ***still*** fail to drastically improve within yet another 2-3 years then the Drift Fisheries will be similarly converted to in-river Dip-Net fisheries. Again this possibility further ensures this heavily-invested fishery will "roll" Kings which are worthy of the name.

Square 32 - Powered Kenai/Cook Inlet King Salmon Fishery Restrictions - Transition Step One of Three

There is ample biological evidence that a King Salmon - if fought to exhaustion in the Salt Water - may recover from the ordeal due to their ability to *continue eating* and thereby regain their strength, after which there is a strong possibility that they can/will mate and spawn. There is little to no credible evidence that a King Salmon when battled to exhaustion in Fresh Water can/will ever fully recover *and* mate/spawn, given that it has not only stopped eating but far more grotesquely there is a strong possibility that - given where it is in its cycle and location - it will either be "in the very process of" mating (and/or have at least partially discharged its eggs/sperm) as it began/continued to fight for its life. For that reason the Powered Kenai River King Salmon Fishery – personal and guided alike - is to be relocated Off Shore into the waters of Cook Inlet which were formerly occupied by the Outside Set-Netters.

Within this relocated fishery small King Salmon (under 24") may be harvested under existing rules, limits and stamps. Medium King Salmon (up to 36") caught in salt water may be kept providing a special $50 (???) Cook Inlet King Salmon stamp has been purchased in advance. At least one such unused stamp must be present whenever there are lines in the water. All King Salmon over 36" will remain at least halfway submerged in approved nets and immediately released once the hooks are clipped/cut, after which only quick measurements and photos may be taken. Non-viable fish will be donated as per above. These measures will help ensure the revitalization of a healthy population of *large* Kenai King Salmon.

Square 36 - Powered Kenai/Cook Inlet King Salmon Fishery Restrictions - Transition Step Two of Three

Should the stock of large (36"+) Kenai River King Salmon ***fail*** to drastically improve to the extent and within the time frames stated above then the now-offshore Powered Kenai King Salmon fishery – again both private citizens and guides alike - will be cut back to the very same hours of operation as the commercial fisheries in Cook Inlet (i.e., drift and beach set-net).

Square 42 - Powered Kenai/Cook Inlet King Salmon Fishery Restrictions - Transition Step Three of Three

Should the stock of large (36"+) Kenai River King Salmon ***still fail*** to drastically improve within yet another 2 to 3 years then the now-offshore Powered Kenai King Salmon fishery will be closed.

Square 48 - Upper Kenai River King Salmon Drift Fishery Restrictions - Transition Step One of Three

For the reasons previously stated above it must be assumed that any King Salmon which is fought to exhaustion in the river will ***not*** mate and spawn and as such might as well be kept. To that end

a limited number of permits will be issued for the taking of King Salmon in the Upper River which follow along the lines of the above. That being so King Salmon under 24" may be retained with a normal King Stamp. Kings between 24" and 36" may be retained providing a special $50 Kenai River Harvest stamp has been purchased in advance. At least one such unused stamp must be present whenever there are lines in the water. Lastly, any King Salmon which is longer than 36" may *either* be released after the hooks are clipped/cut *or* the fish may be retained and donated to either a homeless or veterans organization.

In addition to the above, no Drift Boat may be held in position or otherwise slowed by way of an anchor nor any other device which contacts the river bottom. It is an exceedingly-inconvenient but entirely known and documented fact that Drifts Boats currently drag large/heavy anchors right through the very holes in which salmon have built their nests and laid their eggs thus destroying thousands of fertilized King and Red salmon eggs with every single pass, all while appearing on the surface to be "environmentally kind".

Square 51 - Upper Kenai River King Salmon Drift Fishery Restrictions - Transition Step Two of Three

Should the stock of large (36"+) Kenai River King Salmon ***fail*** to drastically improve to the extent and within the time stated above then the Upper River King Salmon Drift fishery will be cut back to the same hours of operation as the commercial fisheries in Cook Inlet.

Square 57 - Upper Kenai River King Salmon Drift Fishery Restrictions - Transition Step Three of Three

Should the stock of large (36"+) Kenai River King Salmon ***still fail*** to drastically improve given that additional 2 to 3 years then the Upper River King Salmon Drift fishery will be eliminated.

Square 63 - Kenai River Rainbow Fishery

The State of Alaska has spent untold millions trying to eradicate Pike, all in the name of protecting the Kenai's wild salmon populations. Meanwhile, the very same State has spent a commensurate amount of time and effort – if not money – protecting/enhancing that equally-voracious predator known as the Rainbow Trout (if not other such "salmon egg/fry" foraging species). In short, it is hard to see where/how the State of Alaska is being consistent let alone rational when it comes to trout. (This is just yet another example as to why it is critical for *outside* fish biologists and fish economists be consulted, being free from the influences of our preferences and politics, let alone our foregone conclusions and/or sacred cows.)

All that to say it is time to return to the days of Henton's original Sportsman's Lodge at the confluence of the Russian River which - if you study its history - was literally a paradise for sport fisherman meaning *no*: not salmon fishermen. Salmon was almost considered to be a trash fish and most certainly little better than merely a "meat" fish. Instead, those sportsmen came to the Kenai seeking Rainbow Trout and Dolly Varden, or so the brochures of the day would indicate. Oh, and they took them home with them as well!

Meanwhile, while I simply cannot say how successful a large trout might be when it comes to lightly-covered nests full of salmon eggs it is far more than obvious that any/all of the surviving salmon eggs experience a second "clear and present danger" in any river which is teaming with Rainbows. All that to say we are degrading the Sockeye's potential by avoiding the development of a thriving sport-fishing industry that targets the very enemy of salmon; and perhaps only because emotion has overridden logic.

Even so, no: I don't at all propose that we "completely eliminate" trout (and their predatory relatives) in the Kenai River but I would suggest that a truly-objective study needs to be performed with the goal/objective being to relieve the pressure on our salmon populations in the Kenai as it

relates to the presence of trout in two ways: One: Reduce the overall number of predators to something more favorable to our salmon, and Two: Transfer a significant portion of the “guided” fishing industry away from salmon and back towards trout. That would seem to be most helpful to our Kings and Reds alike.

In Closing: Thank you for serving on the Board, thank you for reading the above (completely rejected or otherwise) and - most of all - thank you for giving any/all new/fresh ideas which may come your way this year their due.

What is the issue you would like the board to address and why? Subject: Kenai River Sockeye Salmon: Preservation, Allocation and Harvest Methods, Inclusive of Impacts on Other Species.

There are some 64 squares on a chess board. When it comes to identifying solutions to the ever-growing number of issues related to the Kenai River's Sockeye fisheries – including impacts on other species – it often seems like we have been looking at the very same square for the past 30 years. To that end perhaps something can/will be found in some of those other “as-yet untried” 63 squares.

PROPOSED BY: Thomas Alan Dalrymple (EF-F19-118)

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PROPOSAL XXX

5 AAC 40 regulations governing nonprofit hatchery .

Request that the BOF adopt a regulation to impose on the operator of a hatchery an affirmative obligation, secured by a suitable bond, to ensure that returning hatchery fish are harvested in the cost recovery and common fishery and failing that, that the carcasses of hatchery-produced fish are collected and disposed of in accordance best practices and regulations concerning wastewater pollution control, the disposal of solid wastes, and the disposal of fish wastes.

What is the issue you would like the board to address and why? There have been occasions when a not-for-profit private hatchery operator has decided not to operate in a particular year. This has occurred with Cook Inlet Aquaculture Association's Tutka Bay Lagoon Hatchery in lower Cook Inlet and may have occurred at hatcheries elsewhere in the state. When a hatchery closure like that happens, salmon may return to the hatchery and surrounding areas but not be harvested by the hatchery for cost recovery purposes. If commercial fishermen are not interested in harvesting the fish in the common fishery, such as when the price is too low or when there is no available processor to sell to or processing capacity is exceeded, the fish are not harvested at all. That means the fish are left to die and rot on the beaches, sometimes numbering in the tens of thousands, as happened in the Kachemak Bay and Tutka Bay environs the year Cook Inlet Aquaculture Association decided not to operate. Obviously, numerous carcasses of dead fish numbering in the thousands pose both an aesthetic problem and a pollution problem.

Both the hatchery annual management plans and hatchery permits require the hatcheries to properly dispose of carcasses of dead fish returning to the hatcheries in the years in which the hatcheries operates. The responsibility to do that is not clear, however, if the hatchery doesn't operate. This lack of clarity may arise because technically the hatchery doesn't have an approved plan or permit imposing the disposal obligation in years the hatchery decides not to operate. This anomalous situation needs to be corrected. BOF should adopt a regulation stating that the hatchery operator is responsible for carcass disposal for the life of the reared fish when it returns to the hatchery environs, whether or not the hatchery is operational that year. If necessary, this responsibility should be secured by an appropriate bond.

PROPOSED BY: Mike Frank (EF-F19-126)

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PROPOSAL XXX

5 AAC NA.

The BOF should formally ask the commissioner to require marking for all hatchery raised and released stock.

What is the issue you would like the board to address and why? The original permitting for the Cook Inlet and Kodak hatcheries should have required the permittee to "mark" fish before release. Very few if any pink salmon hatcheries mark fish. The distribution of the stock that returns is not identifiable from other hatcheries or wild stock. The effects of the hatchery released fish on wild stocks while they are in the offshore portion of their life cycle is the huge missing link in present research. Without marking there is no way to determine the growth dynamics of the total biomass of salmon. Asking the Commissioner to require marking is the first step in unraveling these complex unknowns.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (EF-F19-128)

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PROPOSAL XXX

5 AAC NA.

The BOF formally request a specific cost/benefit analysis that clearly shows "benefits to the state" from Cook Inlet and Kodak fisheries including hatchery stocks.

What is the issue you would like the board to address and why? A formal request to the commissioner for a cost/benefit study and report that shows "benefits to the state" from hatchery raised fish. For example, pink salmon. There is no data base that show HOW hatchery fish benefit Alaskans except for those very few who work for hatchery systems and the very few commercial fishermen who "recover" those fish. Cost/benefit is more than just the total sale value of the harvest. It is more than an accounting of operational costs versus income. Hatcheries were built with state loans that had a horrible repayment history and default rate. Those expenses have never been included in the calculation of "benefits to the state". Use of a commonly owned resource to benefit a very small number of Alaskans shouldn't be allowed. There is no authority listed in AS 16.40 that forgives the loans. Commercial fishing may be a billions of dollars industry but where is the general support for state services shown? If the benefit could be specifically identifies, the questions surrounding allowing the hatchery stock to mix and compete with our wild stock could be understandable.

PROPOSED BY: Fairbanks Fish and Game Advisory Committee (EF-F19-129)

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PROPOSAL XXX

5 AAC 00.000. Regulation language goes here.

Insert lead-in language here ("more fish, as follows:")

The board should follow their own protocol by meeting in the area of concern on the customary three-year cycle. Soldotna 2020!

What is the issue you would like the board to address and why? The Board of Fish has not met in Soldotna for 20 years. This is blatant discrimination. The credibility of the board is in doubt. The board solicits participation and denies access for 20 years. I question the validity of regulations passed outside the public process. Think of the public outcry if the board skipped Kodiak, Bristol Bay, Southeast—anywhere else for 20 years! A board that solicits public participation and denies public access is very hypocritical and very unethical! I've said my piece.

PROPOSED BY: John McCombs (HQ-F19-037)

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PROPOSAL XXX

5 AAC XX.XXX. New title.

Create a *Kenai River Coho Salmon Management Plan*, as follows:

The ADFG shall establish a Kenai River Coho Salmon management plan and an early run and late run Coho Salmon sustainable escapement goal (SEG).

What is the issue you would like the board to address and why? Lack of an existing Kenai River coho salmon management plan. These important sport fish cannot be properly managed without a management plan.

PROPOSED BY: Mike Adams (HQ-F19-050)

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PROPOSAL XXX

5 AAC 57.160. Kenai River and Kasilof River Early-run King Salmon Management Plan; and 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan.

Create an Upper Kenai River king salmon sustainable escapement goal, as follows:

The ADFG shall install, maintain and monitor a sonar site on the upper Kenai River upstream of Skilak Lake. The ADFG shall create an upper Kenai River king salmon sustainable escapement goal [SEG].

What is the issue you would like the board to address and why? Decreasing stocks of spawning king salmon have been observed above Skilak Lake. A lack of sufficient data about upper Kenai River king salmon run strength makes managing Kenai River king salmon stocks for overall diversity of stocks extremely difficult.

PROPOSED BY: Mike Adams (HQ-F19-053)

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PROPOSAL XXX

5 AAC XX.XXX. New section.

Create an upper Kenai River sockeye salmon management plan, as follows:

The ADFG shall establish an upper Kenai River sockeye management plan. ADFG shall institute an upper Kenai River sustainable escapement goal [SEG] for sockeye salmon. A plan shall be established for implementing an upper Kenai River sonar site for estimating run strength within the main stem upper Kenai River independent of the Russian River weir, and the Trail River weir (i.e. upper Kenai River sonar site). Bag limits below Skilak Lake will not be liberalized until established upper river escapement goals have been reached.

What is the issue you would like the board to address and why? Sport fishermen and guides have observed a serious decline in the number of returning sockeye salmon on the upper Kenai River in recent years. The decline in sockeye numbers is a disturbing trend and is being observed even on years when inriver escapement goals are met. This decline in salmon returns has a direct impact on stock diversity, sport and subsistence harvest opportunity and the economic wellbeing of the community of Cooper Landing.

PROPOSED BY: Mike Adams (HQ-F19-054)

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PROPOSAL XXX

5 AAC XX.XXX.

This, as follows:

Terminate this fishery or execute the fishery in July while targeting millions of sockeye salmon that are entering the Kenai River.

What is the issue you would like the board to address and why? In recent years, the Alaska Department of Fish and Game executes a cost recovery fishery that intercepts early run King Salmon. This stock has been challenged to meet escapement goals. This cost recovery practice needs to be terminated. The funds from this fishery that targets sportfish is used by the commercial fishing division to partially fund their index test boat. In addition, this is labeled as a "cost recovery fishery" that I do not believe is legal, as there are no enhanced fish that are targeted by this fishery that should be a requirement of a "cost recovery fishery."

PROPOSED BY: Joe Hanes (HQ-F19-066)

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PROPOSAL XXX
5 AAC
This, as follows:

5 AAC 18.330 Annual Management Plan (AMP):
1.The Kodiak Salmon Harvest Strategy Plan (KSHSP) shall be Published at least 8 weeks prior to the proposed starting date for the Kodiak salmon season.
2. The Department shall annually conduct a pre-season meeting with Kodiak salmon stakeholders regarding the Kodiak Salmon Harvest Strategy Plan not less than three weeks prior to the season opening date and, if possible, in conjunction with a Kodiak Fish and Game Advisory Committee meeting.
3. As part of the Kodiak Salmon Harvest Strategy Plan the Department will make best efforts to prepare an annual post season harvest analysis to present to the Kodiak Fish and Game Advisory Committee by December 1 following the salmon season. The assessment should include:

a. Summary of how in-season management practices from the prior season conformed to the
KSHSP.
b: "Unrealized management Goals" identified by both ADF&G and stakeholders.
c: Escapement summaries by area and species of major systems.
d: Traditionally blended and pulsed fisheries on mixed stocks.
e: In-season management to realize maximum harvest quality.
f: Compliance with KMA's Fisheries Management Chronology Phases I,II,III & IV.

4. The Kodiak Fish and Game Advisory Committee (KFGAC) shall provide minutes from their review of the Department's annual post season summary regarding conformance with the Kodiak Salmon Harvest Strategy Plan. Said minutes shall become part of the Department's Annual Management Report and shall be provided to the Alaska Board of Fisheries when considering Kodiak's compliance with their Kodiak Salmon Harvest Strategy Plan (KSHSP) based on the Kodiak Salmon Management Plans in regulation.

What is the issue you would like the board to address and why? Presently, the Kodiak Management area does not have a requirement in regulation requiring
that the Department provide an annual "Kodiak Salmon Harvest Strategy Plan" (KSHSP) based on the area management plans already in regulation. Moreover, integration of the best pre-season information regarding runs strength in the Kodiak Salmon Harvest Strategy Plan can be uneven and sometimes untimely. We appreciate that the Department voluntarily develops an annual KSHP but the creation of that plan and the content are not in regulation. Adopting a requirement for the Department to develop an annual Kodiak Salmon Harvest Strategy Plan would provide the Department, stakeholders, advocates and the Alaska Board of Fisheries with a clear understanding regarding what is expected and required regarding Kodiak area salmon management documentation. Moreover, requiring the Department to conduct post season review of the plan's implementation as well as pre-season meetings outlining the plan, would formalize what is currently an informal process.

PROPOSED BY: Kodiak Salmon Workgroup (HQ-F19-127)
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PROPOSAL XXX
5 AAC.
This, as follows:

We propose that Fish and Game install the salmon counter on the Kasilof River on June 10 of each year. June 10 will provide a more accurate fish count and opportunity for commercial setnet fisherman to start the first Monday or Thursday after June 20th. This count would also provide biologist a more accurate number for escapement of sockeye in the Kasilof River.

What is the issue you would like the board to address and why? The Kasilof River has a significant amount of Sockeye salmon entering the river prior to the installation of the salmon counter on the date June 15. The upper Cook Inlet commercial setnet fishery experience often experience their best fishing days in the beginning of their allotted season. Thousands of Sockeye enter the river without being counted for.

PROPOSED BY: Kelsey Deiman-Szymanski and Gary Deiman (HQ-F19-136)
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