

Petition to the Alaska Board of Fisheries

I am petitioning the board to take no action on their recently prepared "Board generated proposal" seeking to change the Kenai River Late Run King Salmon Management Plan, which they have been deluded into believing that the department followed in 2012 by the cloud of misinformation the department has generated trying to cover their tracks on the debacle they have created. The department closed the ESSN fishery repeatedly from June 25 until mid July outside of the plan. Mr. Regnart announced in early July that he was not using the plans and the department was managing by Emergency Order. Of course we now see that there were 29,000 kings and that without any restrictions the escapement goal would have been met. Instead of changing the plan that has worked for 26 years without even knowing how many kings there were the Board should change the department's performance by directing them to follow the original plan and manage for an Interim Escapement Goal (IEG) of at least 13,000 and no more than 28,000 late run Chinook for 2013 only. This is the escapement range that produces 90 percent of MSY from their report without the hidden allocation they have tried to build into the new escapement goal. We have been told this additional 2,000 was necessary because they have never seen escapements this low, but if that were the case there would have been no reason to add 2,000 at the upper end of the goal and since they never have been able to count the fish evidently who knows how often the escapement has been near 15,000. We keep hearing this "error on the side of conservation" mantra, why not try to prevent the errors at all. Managing for this IEG protects the fish stocks and fisheries for 2013 and will give the department and public approximately one year to get their reports up to date and look into this new escapement goal a little more thoroughly, as yet we have not even seen a single DIDSON escapement report to see how the sonar works and how some of the inherent problems will be corrected.

What problems you say well we have only had these reports for a short while but for the last 26 years the department has defended the TS based counts with the five indices they planned to use in 2012. They keep saying these TS based numbers can not be converted to DIDSON, what we now find that really means is they were not good, and will hereafter be referred to as CRAP. The five indices are however good, so good in fact they can be used to generate new escapement numbers all the way back to the 1980's. In addition to the five indices, when anchored with M/R numbers from 1996-1997 and those from 2000's they can create escapements to 1986. However they have not used the M/R estimates from the 1980's for some inexplicable reason which surely must be more accurate than a computer generated random number.

In order for the DIDSON counter to work they need an unbiased estimate of length frequencies, the netting report says that the age comp and length frequencies are biased to larger fish. When you look at the commercial age comp (Page 22 of the draft run reconstruction report) they certainly look much different than the ages from above river mile 9, maybe due to not netting near shore where the smaller fish are or possible net selectivity but it should be addressed before an escapement goal is accepted.

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Another problem that has not been clearly stated is that when they say they do a 10 minute count on each side of the river, what they really mean is they do a 2 minute count in each of 3 sections and a 4 minute count in the last section on each side of the river. In effect they count in any one section for 2 minutes and multiply by 30. This seems substandard introducing errors and needs to be evaluated before this goal is accepted!

From the In-river genetics report more than half of the fish entering the river the last two weeks of June are actually Late-Run in origin. While we still are waiting for an early run report it would seem that from several hundred to several thousand fish attributed to the early run are actually late run. In addition 50 percent of the middle river harvest July 1-15 are actually early run fish meaning the early run is weaker and possibly much weaker than thought and by the same token the late-run is stronger, possibly much stronger.

In 2012 the last day of counting had a count of 1,100 Chinook and the counter was pulled. With a total count of approximately 22,000 it seems ridiculous to pull the counter with 5 percent of the run coming in on the last day. And let's not forget that for the last 26 years 30 percent of the fish are behind the counter without anyone noticing? After all of these debacles for the last 26 years we now hear that the middle managers responsible for this economic, regulatory and biological mess are receiving wind fall pay raises just like the bankers that brought the economy to its knees 4 years ago. Governor Parnell should be very proud of his accomplishments. For these and many more yet undiscovered problems the board should accept this petition.

Thanks
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