

Mr. Geoff Haskett  
USF&W Alaska Regional Director  
1011 E. Tudor Rd.  
Anchorage, Ak. 99503

Jan. 15, 2013

Dear Mr. Haskett

The Kenai Area Fisherman's Coalition (KAFC) is a private angler organization composed of scientists and concerned users of the Kenai Peninsula waters. We have fisheries biologists in our organization that provides over 120 years of experience on the Kenai and Upper Cook Inlet (UCI) in both research and management. We also like to consider ourselves a "Joe Fisherman" organization since we have no commercial interest. You can find out more about us on our website at [www.kenaifisherman.org](http://www.kenaifisherman.org).

We are writing this letter out of our concern for the Kenai River Early Run (ER) Chinook populations that have been in a precipitous decline since 2006. The causes for such a rapid decline are largely unknown, however, we believe that this decline is due in part to unknown marine survival issues and inappropriate in-river harvest patterns. Other contributing factors are fishing on mainstem spawning fish in July, insufficient spawning area protections, and over-harvest of the population because of biased high sonar counts.

Department data illustrates that these stocks have declined by about 70% since 2006 compared to previous historical values. This assertion is hard to quantify, however, since ADF&G is transitioning from the old split-beam sonar system to the new Didson system. They have little confidence in historical sonar counts and insufficient data to evaluate the Didson counts by comparison. This quandary brings into question their assumptions of escapement and productivity used in managing this fishery. Recently released data suggests that we have not made the escapement OEG of 5,300 in any of the last five years. Additionally, there are other indexes of abundance that also indicate significant declines in ER numbers.

There are two other quantifiable indicators that cooperate this decline. Since 2006, USF&W has operated a weir on the Funny River to determine early run strengths into that tributary. In 2006, 2,779 ER Kings were counted. Counts since have steadily declined to only around 870 in 2012. This illustrates about a 70% decline in the last 6 years. ADF&G also established a weir on Slikok Creek in 2008. Historical foot counts from 1990 – 2004 averaged 165 Kings with some years exceeding 300. Since 2008 the counts have averaged around 46 fish. In 2012 the count was 30 with only 10 females and we can expect bear predation to reduce this number significantly. These values represent about an 80% decline since 2004. It should be mentioned that these 2012 Funny River and Slikok Creek weir counts were very low but they could have been much worse if it weren't for the in-season harvest restrictions put in place by the department.

Since there is no Cook Inlet commercial fishing on these stocks, we believe that an in-river over-harvest situation may have occurred as a result of biased high sonar counts

throughout the years where harvest restrictions may have been appropriate and necessary to insure future production. Furthermore, the mainstem component of the ER, estimated at about 20%, probably incurred even larger declines because their window of exploitation vulnerability is longer than for any other portion of the Kenai River Chinook population.

We have also witnessed increased pressure on this mainstem component in the middle river because of the declining numbers of Late Run Chinook (LR) entering the lower river. Some fishermen believe that fishing on these middle river spawning locations can be more productive than competing for the few fish that may be entering the lower river on a daily basis.

These mainstem ER Kings are also unique because of their size. Recent corresponding data illustrates that the mainstem fish are significantly larger than the tributary stocks. For this reason they have been selectively harvested over the years and may face systematic elimination in the near future if they are not afforded additional protection. The 97 pound world record King caught in May of 1985 was an ER fish and most likely an ancestor of the mainstem component.

For these reasons, our group feels that it is reasonable to assume that some conservation measures are absolutely necessary if we are going to begin to rebuild these stocks and institute some meaningful measures to preserve this resource for future generations to enjoy. We believe that the sport fishery is only going to grow and it is now a prudent time to identify some important spawning area closures to help protect the natural genetic diversity and long term future production of these King Salmon stocks within the refuge.

Therefore, we are hereby petitioning the USF&W to take the lead in this regard and close the Federal waters of the Kenai River, under your jurisdiction, from the outlet of Skilak Lake downstream to your lower boundaries at approximately RM46 to all fishing for King Salmon. By taking this action your Agency will illustrate its willingness to take the lead in Kenai River ER Chinook Salmon conservation to protect and preserve this valuable resource.

Thank you for consideration in this matter.

Dwight Kramer  
Chairman KAFC

Cc: Andy Loranger, Mgr. Kenai NWR