

# SOUTH K BEACH INDEPENDENT

## FISHERMEN'S ASSOCIATION

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*Protecting and Preserving the Kasilof River Aquarian System*

October 15, 2014

Alaska Board of Fisheries  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

RE: Comments on ACR's 13 – 19

Support of setting an UCI regulatory meeting on the Kenai Peninsula in 2017

Chairman,

*South K-Beach Independent Fishermen's Association (SOKI) is a fishing group established to inform and comment on specific effects of management and environmental actions on the area designated by stat area (244-31) adjacent to the mouth of the Kasilof River.*

SOKI has recently reviewed the 2014 UCI salmon fishery summary dated 10.10.14. Note that the events predicted in a previous SOKI petition occurred this past summer. Overescapement of the Kasilof River sockeye of 439,977; 99,977 over the top end of the Biological Escapement Goal (BEG). The Kasilof River Special Harvest Area (KRSHA) was utilized for 17 days resulting in a harvest of 189,000 of sockeye and 560 king salmon; origins are unknown at this time. We are concerned about meeting the minimum escapement goal for Kenai kings yet in the *terminal* area we may be impacting the sustained yield of Kasilof bound king salmon. We question this management practice as trying to *fix* one problem but in fact are creating two. We highly suggest that the BOF review the ACR's and consider SOKI's comments. We further would appreciate if the board would set a time and place that will be accessible to UCI stakeholders to further discuss and improve the actions adopted in the 2014 UCI regulatory meeting. We believe that the "*policy*" adopted into regulation (5 AAC 39.999) allows the board to be flexible in its interpretation and as in (a) (2) ... *new information that is found by the board to be compelling*;

### ACR 13 SUPPORT

We support groups that comment that "*changes to area restrictions may potentially have merit*" is reason to accept this as an ACR so that the previous actions could be improved.

**An unintended consequence resulting from a conservation re-allocation within a user groups historical harvest opportunity is a serious departure from the tenants of fair and reasonable fisheries management.**

The Alaska Department of Fish and Game (ADF&G) has stated in public this post season that even though they have the *Commissioners authority* to make *inseason* changes they do not have the BOF clear understands of how and when they could use this tool when a re-allocation of the resource *may* occur. We believe that the managers already have the guidance within regulation but that their reluctance to institute these measures is based on a clear and concise authorization from the BOF to implement these tools.

#### **ACR 14 OPPOSE**

This is a ridiculous request with no scientific merit. This is dominantly allocative and will result in less efficiency to harvest targeted sockeye, result in wasted resources and create yet another burdensome cost to the Kasilof district fishery when many are still reeling from the cost of implementing a 29 mesh change over from the previous restrictive measures. Somehow the author believes that this will improve his opportunity to harvest sockeye by further defeating the economic viability of the majority of the ESSN harvesters.

#### **ACR's 15 & 16 SUPPORT**

SOKI asked for this consideration in their petition offered to the BOF dated March 20, 2014. Board members discussed this at the petition hearing and asked the ADF&G if they had the authority to already do this. The department replied several times too many BOF members that they in fact do have the authority to mange the two sections (70 miles) differently based on distribution, run strength, and run timing of king and sockeye salmon returning to the Kenai and Kasilof rivers. What the board didn't ask is whether they had enough clarity in when they could implement targeted abundant based management within the confines of the Late Run Kenai King (LRKK) management plan hourly restrictions.

#### **ACR 17 SUPPORT**

This is to correct an error in regulation.

#### **ACR 18 SUPPORT**

SOKI supported this change in the KPFA petition submitted to the Board on March 20, 2014. We believe that this has created to sets of escapement goals for the LRKK that is extremely burdensome to ESSN fishery. It is an impossible hurdle to accomplish and requires managers to guess what the final escapement will be after August 15<sup>th</sup> before August 1<sup>st</sup>.

#### **ACR 19 SUPPORT**

We believe that an opportunity exists that will lessen the nets in the ESSN districts. Registering a permit in different areas for the entire year will alleviate some economic distress for some setnet fishing families while improving the conservation efforts for

kings when it is necessary. This is not a consolidation exercise but a one of convenience for UCI setnet permit holders. The board felt it necessary to restrict mesh depths for the second permit if used; this proposal would potentially eliminate three nets entirely from the fishery for a given year.

**We support in its entirety the efforts from all parties on the Kenai Peninsula to have the UCI meeting held on the Peninsula.** SOKI members participate in the Kenai Soldotna Fish and Game Advisory committee process and support their unanimous letter of support. We do offer an addendum to their letter in a accurate location of the current majority of AC's who reside within the confines of the Kenai Peninsula.

SOKI members are here to assist board members with questions about their comments at this worksession. Please feel free to ask questions to expand on comments made within.

Thank you.

Paul A. Shadura II  
Spokesperson

**Advisory Committees in Alaska (as published on ADF&G website 10.01.14)**

**SE: 23**

**Western: 7**

**SW: 12**

**Interior: 15**

**Southcentral: 18**

**Kenai Peninsula: 6**

**Kenai Peninsula Borough: 7**

**Arctic: 9**

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**Total: 84**

**Advisory Committees by borough in the southcentral designated region:**

**KP: 7**

Central Peninsula

Cooper Landing

Homer

Kenai-Soldotna

Seldovia

Seward

Tyonek

**Mat-Su : 3**

Matanuska Valley

Mt. Yenlo

Susitna Valley

**Anchorage: 1**

Anchorage

**Denali: 1**

Denali

**Other non-borough: 6**

Copper Basin

Copper River/PWS

Paxson

Tok Cutoff/Nebesna Road

Valdez/ PWS

Whittier/ PWS & KP