

To: Alaska Board of Fisheries

Attn: Art Nelson, executive director

Re: **Complete Opposition to RC 096 action plan submitted 2/26/2024**

Date: 2/27/2024

Board Chair and members,

This so-called Kenai River late-run king salmon stock of concern Action Plan completely negates an orderly fishery to occur within the Kasilof Section, especially in Stat Areas 244-21 and 244-22.

- From June 20 – June 30 in the Kasilof Section timeframe negates the 30,000 fish into the Kasilof River to open which normally occurs on or around June 23rd and fishermen rely on that trigger to open by emergency order / under ‘shall open’ and plan for in regulation/Kasilof River Salmon Management Plan 5AAC 21.365.
- The prescriptive (3) 8-hour periods for a total of 24 hours is complete shell game/farcical on hours and the use of hours in Stat Areas 244-21 and 244-22. **The so-called 8 hours with the use of only (1) 29 mesh depth net per permit holder is in reality the equivalency of only 1and ½ hours of fishing time calculated on CPUE comparative reductions.** The 24 hours proposed is only 4 and ½ hours of fishing time total. This nonsense takes 2/3rds of our gear away and further reduces standard gear by another 1/3. And takes a normal 12 hour orderly opening down to the supposedly 8 (which is only 1and half hours total).
- This does nothing to protect the sustainability of Kasilof River sockeye salmon stocks and will guarantee further gross over escapements and future foregone production losses.
- The staggered opening tidal times and opened only during mid-tide sets is extremely dangerous on my beach and 6 miles of neighboring beach shorelines. The topography and geographical contours change dramatically every 1,000 feet. Mid-tide sets are dangerous and requires setting at near full throttle and no margins for error or you lose your fingers or hand or worse / get tossed overboard wrapped in gillnet. Of note: one of 10 National Standards is Safety at Sea under an Orderly Fishery and I don’t fish with tractors on the beach. Of
- There is 168 in a week and they want to want to retain the mandatory 36-hour window when it’s maybe a 3 hour of CFUE fishing time per week at best – this is again ludicrous by comparison to all other user groups fishing times, which are liberalized and expanded daily and weekly.
- The proposed mandated closure from July 1- July 14 precludes my Area’s most productive fishing time historically based on run timing of Kasilof sockeye stocks. This will send half a million Kasilof sockeye into the Kasilof River. Another prescriptive measure to collapse and decimate returns. Apparently, the authors of this so-called plan have no regard for the Kasilof sockeye salmon system (BEG range) or the 240 permit holder/fishermen/fisherwomen within

Stat Area's 244-21 and 244-22 most dependent of these resources for generations. In addition, this so-called planned closure time will send Kenai salmon stocks directly to Kenai Section based on run timing for their desired opening date of July 15th – 27th which corresponds with Kenai River king salmon run timing in the Kenai Section especially along North K-beach.

- From July 14th – July 27th when the Kenai late-run king SEG is projected to be exceeded – they still want further restrictions on limited gear and limitations on hours – really? The ESSN should be prosecuted normally under established sockeye plans – period. The OEG needs to go away-period.
- From July 28 – August 15 if the SEG is projected to be met – it goes to maybe an opening, again with limited gear and restrictive gear. Again, the ESSN should be prosecuted normally in the established Kasilof River and Kenai River sockeye salmon management plans.
- Remarkably, RC purports unnecessary restrictions and inducing even more harm to all user groups, especially set gillnet fishermen who have been excluded from sockeye harvest for years, including the non-harvest of other salmon resources - when over 15,000 late-run kings are forecasted or projected in-season. A 'may be opened' provision represents nothing but closures. It even restricts the sport fishery unnecessarily. These prescriptive measures are nowhere else practiced on king salmon stocks of concern. For example Karluk River kings, Nushagak River kings, Ayakulik River kings, Chignik River kings which are managed under all size fish goals. Commercial fisheries are prosecuted normally in the Kodiak and Bristol Bay Regions.

KPFA or KRFA in their heading has little to no representation as far as the eye can see along my beach area. Their membership is limited to couple of dozen and their board represents permits holders on North K-beach 244-32 and 244-41 Salamontof Beach.

Everyone seeks and prays for relief but RC 096 places harm on the set gillnet fishermen along Stat Area 244-21 and 244-22.

Respectfully submitted,

Jeff Beaudoin
Permit holder/Owner/operator 244-21 stat area and 244-22
Kasilof, Alaska

Mark Ducker
Permit holder/Owner/operator 244-22 stat area
Kasilof, Alaska

