

SOUTH K BEACH INDEPENDENT**FISHERMEN'S ASSOCIATION**

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Protecting and Preserving the Kasilof River Aquarian System

February 24, 2017

To:

Alaska Board of Fisheries

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Re: proposals 101 ,111 ,131 ,169 ,176

Chairman Jensen;

The South K-Beach Independent Fishermen's Association (SOKI) is a community association representing a voice for the southern Kalifornsky Beach statistical area (244-31). We formed as a way to support the Kasilof River sockeye commercial fishery and to assure that our stat area management issues and our recommendations would be considered.

SOKI is very concerned with the onerous restrictions applied to 5 AAC 21.359 Kenai River Late-Run King Salmon Management plan in 2014. We are further disturbed with the apparent escapement goal changes to a large king goal based on a statistical exercise to make it "fit" a statewide model rather than to consider the information derived from current DIDSON or ARIS sonars. The board should take note that there is serious contradiction in many of the untimely submitted reports to justify the acceptance of these goals. We strongly encourage the board to question the ADF&G staff on these inequities in modeling and the lack of long term credibility in using data from converted data from 1986 – 2009.

The 13,500-large king goal is 90% of the current lower bound 15,000 all king goal yet all other actual data for the last five years shows a lower percentage of large kings migrating through the mile 13.7 ARIS counter. The question that has not been answered here is what is the real comparison from the previous indices to the current proposed point goal.

We also see that the past board justified a quota to the in river commercial guide industry, a 7,500-king salmon direct allocation without regard to sound conservation principles or equitable shared burdens resulting in severely reducing the opportunity of East Side Set Net (ESSN) fisherman to harvest sockeye in an historical and traditional manner. The board disregarded the negative impact on exceeding the carrying capacities to both the Kenai and Kasilof Rivers of sockeye effecting future returns. Clearly effecting all users including personal use stakeholders who rely on healthy red salmon concentrations for success.

SOKI supports RC 14 and is fully prepared to assist with any justifications.

Proposal 101 – This change would allow the department flexibility in using the 600ft provision in lieu of the Kasilof River terminal area and the restrictions in 21.359. It further clarifies that this action can be justified for sockeye or king salmon conservation.

Proposal 111 - Clarifies that dual permit holders can use both permits in the terminal area.

Proposal 131- This is a simple housekeeping rule that establishes coordinates for the division between two statistical areas.

Proposal 169 – This would correct the inequities in regulation that severally burdens our fishery and forces our traditional and historic fishing practices to operate with reduced gear in the Kasilof terminal restricted area.

Proposal 176 – This adjustment would alleviate the quandary in the department from having to manage for one area over another due to restricted EO time allotments. Separating 49 miles of beach with a two-hour tide differential allows harvesting at crucial times of abundance on two (Kenai and Kasilof) separate stocks of sockeye. Managers can use the principles of time and area to manage on what is the hallmark of in season management.

We would like BOF members to take note that our stat area (244-31) according to current reports have the lowest percentage of Kenai Kings harvested and the lowest actual number of Kings greater than 75cm. It has the highest percentage of Kasilof River sockeye stocks harvested in comparison with the Kenai River sockeye and other systems as compared to different statistical areas.

SOKI is ready and we are available to respond to questions about our fisheries.

With all respects to the resource,



Paul A. Shadura II

Spokesperson