

PROPOSAL 110

5 AAC. 21.359. Kenai River Late-Run King Salmon Management Plan.

Provide additional commercial fishing opportunity for set gillnet gear within the *Kenai River Late-Run King Salmon Management Plan* as follows:

PROPOSED:

Add the below text (a mere 50 words) to current text in 5 AAC 21.359 (d) (3)

(3) close the commercial set gillnet fishery in the Upper Subdistrict of the Central District (existing language)

ADD...except that if the Kenai River late run sockeye salmon, and Kasilof River sockeye salmon escapement goals are projected to be achieved or exceeded then Upper Subdistrict set gillnet fishing periods, under 5 AAC 21.320 (2) (E) that shall be limited to within 1500 feet from the mean high tide mark, shall occur.

What is the issue you would like the board to address and why? THE ISSUE:

The current regulation fails to provide adequate, appropriate and adaptable management tools to the ADFG to manage the ESSN fishery in order to achieve escapement goals for all species of salmon during times of low king salmon abundance. The current management plan results in management prescriptions that are solely focused on Kenai River king salmon to the detriment of all other species and stocks of the Upper Subdistrict and specifically to the unfair and unnecessary detriment of the ESSN fishery.

It is important for the board members to understand the logic and the logistics of the proposed language below and we hope to have the opportunity for a thorough hearing and education of the board members. The below proposed language defines ACCESSIBILITY TO FISHABLE NEAR SHORE WATER ONLY, not a constant fishing area. The majority of the time the bulk of THIS SPACE DESCRIBED BELOW IS LITERALLY SANDY BEACH.

THE CURRENT REGULATORY EFFECTS ON FISHERY:

1. (Effect) The current regulation completely “ties the hands” of ADFG managers and allows for no adaptability to real time variables that *have, and always will, occur* in a wild run, mixed stock fishery.

2. (Effect) Significant loss of use of the sockeye resource to the detriment of the health of both the sockeye and king salmon stocks by causing the inability to harvest sockeye throughout the whole-of-the-run timing spectrum and the building-up effect of the latter portion of the sockeye run...

3. (Effect) ...and further, by having large numbers of sockeye salmon over running the spawning area of the main stem (of the Kenai River) spawning king salmon, which is contrary to the desired objective of enhancing king salmon production in the first place.

4. (Effect) The over escapement of sockeye salmon which is contrary to the management mandate of MSY — the effects of which are now playing out in UCI.

5. (Effect) The unfair and unjustified complete closure of the ESSN fishery to ANY harvest opportunity of sockeye while every other user group is given liberalized access to the same sockeye salmon resource. Under the current regulation which has been implemented extensively since 2012, harvest scenarios *always result* whereby harvest opportunities increase for every other user group in UCI with the exception of a complete total, unalterable *elimination of all harvest opportunity* of any and all species of salmon for the ESSN fishery. This is having serious negative impacts on local residents, the local economy, fish processors, and the local culture and IS NOT A SCIENCE BASED REGULATION.

THE BENEFITS OF THIS REGULATION CHANGE:

1. Would significantly reduce the set gillnet catch of king salmon by limiting setnet fishing to only a narrow strip of near shore water by "beach nets" during times of low king salmon abundance. Extensive experience shows king salmon rarely swim this close to shore.
2. Would allow an adaptable restricted sockeye fishery that would actually be effective.
3. Would enable fishery managers to better meet the escapement goals and prevent over escapement of sockeye and waste of the resource; such as occurred so dramatically in 2019, 2020, 2021 and yet again in 2022! This pattern which the setnet fishermen warned the BOF would happen, has indeed played out as predicted by those who truly understand the fishery and must be stopped.
4. Would allow for a balanced and adaptable management tool for managing a highly variable and unpredictable mixed stock fishery that cannot be managed by the current predefined, inflexible, restrictive and even draconian regulation.

This changed regulation will provide fishery managers with much more adaptable and appropriate tools to manage the mixed stock fishery according to real time circumstances rather than be locked-in to a mandatory fixed total closure of an entire major sector of this fishery; and will allow managers to avoid the negative effects listed above.

PROPOSERS INVOLVEMENT AND PERSPECTIVE IN THIS FISHERY:

1. Commercial fishermen in UCI with 58 years of exposure and experience; (1964 to present) from a young boy to maturity. Extensive first hand, long term experience about fish patterns, management and the fishing resource in general from a broad and accurate perspective.
2. Input, advice and support has been obtained from other local stakeholders, experienced participants and ADF&G Area biologist managers.

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