

SOUTH K BEACH INDEPENDENT

RC 033

FISHERMEN'S ASSOCIATION

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Protecting and Preserving the Kaslof River Aquarian System

December 10, 2013

To: Boards Support Section
Alaska Department of Fish and Game
P.O.Box 115526
Juneau, AK 99811-5526

ATTN: Chairman Johnstone

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 adjacent to the mouth of the Kaslof River.

We would like to comment on a selected number of proposals that the Board of Fisheries (BOF) will be deliberating on at this Lower Cook Inlet regulatory meeting.

Proposals: 82, 83, 84

Our interests for this group of proposals to support the implementation of identifiable "Special Harvest Areas" (SHA) to capture sufficient numbers of brood stock to perpetuate the program and to recover sufficient costs by "Cost Recovery" (CR) to continue hatchery programs that will continue to benefit the *entire* regions of Cook Inlet the Kenai Peninsula and Resurrection Bay; all which have been identified by the author within the Associations responsibility.

We would like to clarify that additional language added by the Department (ADF&G) is not the original language that Cook Inlet Aquaculture Association (CIAA) submitted.

In each of the initial paragraphs describing the intent of these proposals (after the bold scripted first sentence) are not CIAA comments. In particular is the phrase achieving harvest priorities is not the purpose nor the goal of CIAA. The Association is only a *consultant* in the Annual Management Plan (AMP) as the Commissioners office (ADF&G) maintains the authority to instruct both divisions of sport and commercial to manage within the guidelines established by the Commissioner and the Regional Planning Team (RPT) on a yearly and inseason basis. **(Sec 16.10.375 Regional Salmon Plans)**

We would encourage the Board to review the responsibilities of the Commissioner defined in statute. Within **(Sec 16.10.520 Limitations on loans (f))** ... *unless the Commissioner determines, in consultation with the appropriate regional planning team ... that the hatchery or enhancement or rehabilitation activity for which the loan is requested will provide a significant contribution to the common property fisheries.*

operated in a manner beneficial to the public interest, and be managed in a prudent and viable manner that is reasonably expected to result in repayment of the loan.

In our view, this is clearly the intent of the Legislature to grant the authority and responsibility of the State through the Commissioners office to assure that the public interests are protected and that the States investments are secured by the bloodless cost recovery activities of the Association.

It should be noted that in **(Sec 16.10.540 Voluntary assessment on sale of salmon)** **(a)**...that consists of at least 51 percent of the persons holding equity permits...and **(b)** ...reasonably believed a pool to secure the repayment of the mandated requirement and **(b)** ...reasonably believed a pool to secure the repayment of the

Clearly, the State enters into a collateralized agreement to loan monies to a regional aquaculture association only after considering the long term viability of the project and continues to monitor and manage the activities through the commissioners office and granted authority through the legislature.

The BOF duty has only to consider the harvest geographically designated areas and activities within that area.

It should be noted here that the dates specified are an all encompassing time period for each management plan area and were suggested by the Department. Rarely are these times used at the extreme ends of the state time period and these ranges were recommended by the area management of ADF&G and by CIAA. The latest proposal 84 reflects the need to cost recover excess silvers in the Beaufort area many miles after the predominant recreational fisheries areas. Never has there been recovery for Coho's within the Resurrection Bay area.

None of the times designated for cost recovery are determined by CIAA as the Department managers decide when to implement the openings after considering the duties and responsibilities of the Commissioners offices and the current ADF&G

We would like to address the perception that CIAA has used public appropriations for their own activities. The Association operates State owned facilities and the regional and administrative bodies have from time to time funded capital improvements to support maintenance and code requirements of these government owned facilities.

We would trust the Department to continue to manage for the common benefit of users in the entire region by supporting the long term goals of the Association and continue to allow CIAA to comply with financial commitments required by the State of Alaska.

Thank you,

Paul A. Shadura II
SOKI spokesperson