

PROPOSAL 210 – 5 AAC 21.358. Northern District Salmon Management Plan. Repeal and readopt management plan to fully utilize surplus salmon stocks based on the abundance of salmon returning to the Northern District, as follows:

(Repeal and Readopt)

5 AAC 21.358. 5 AAC 21.358. Northern District Salmon Management Plan

(a) The purposes of this management plan are to provide the department direction for management of Northern District of upper Cook Inlet salmon stocks. The department shall manage these chum, pink, and sockeye salmon stocks utilizing fishing time in 5 AAC 21.320(a)(1).

(b) The department shall manage the Northern District commercial salmon fisheries based on the abundance of sockeye salmon counted through the weirs on Larson, Chelatna, and Judd Lakes or other salmon abundance indices as the department deems appropriate.

(c) From July 20 through August 6, if the department's assessment of abundance indicates that restrictions are necessary to achieve the escapement goal, the commissioner may, by emergency order, close the commercial set gillnet fishery in the Northern District and immediately reopen a season during which the number of set gillnets that may be used is limited to the following options selected at the discretion of the commissioner, except that from July 31 through August 6, the commissioner may allow the use of two set gillnets in that portion of the General District south of the Susitna River:

(1) three set gillnets that are not more than 105 fathoms in aggregate length;

(2) two set gillnets that are not more than 70 fathoms in aggregate length;

(3) one set gillnet that is not more than 35 fathoms in length.

(d) In addition to the provisions specified in (b) and (c) of this section, the department shall manage the Northern District commercial salmon fisheries under the following constraints:

(1) additional fishing periods, other than the weekly fishing periods described in 5 AAC 21.320(a)(1), may not be provided when coho salmon are expected to be the most abundant species harvested during that period; additional fishing periods may not be provided based on the abundance of Northern District coho salmon;

(2) after August 15, the department shall limit the harvest of coho salmon in the Northern District by limiting commercial fishing time to the weekly fishing periods described in 5 AAC 21.320(a)(1).

(e) The department shall, to the extent practicable, conduct habitat assessments on a schedule that conforms to the board's triennial meeting cycle. If the assessments demonstrate a net loss of riparian habitat caused by noncommercial fishermen, the department is requested to report those findings to the board and submit proposals to the board for appropriate modification of this management plan.

What is the issue you would like the board to address and why? The board, ADF&G and sport fishing enthusiasts have continued to interpret the "minimize" language in this and other plans as if each year it is necessary to again restrict the commercial harvest of all coho stocks as if it were a half life determination to get to zero. This was never the intent of this language, rather minimize was meant to indicate that the commercial fishery would not be given additional fishing periods targeting coho but that their catch during regular periods was not only permissible but expected. The departments own studies indicate that the Northern District commercial harvest of all stocks is extremely small and that the stocks of coho they are trying to protect Susitna and Little Susitna Rivers are through the Central District by August 1 and the Northern District a few days later. The Board has put punitive restrictions on the Northern District which benefit no one. What this continued myopic view has lead to large unharvested surpluses in many of the streams that are against the Alaska Constitution mandating that surplus renewable resources be made available to the public. The Alaska Supreme Court just weighed in on this subject stating that the salmon stocks in Cook Inlet had to be managed for escapement goals and sustained yield and that the Boards plans were nothing more than guidelines which should be ignored inseason by the department.

Unharvested surplus salmon describes those salmon in excess of escapement needs that are not harvested by commercial, sport or personal use fisheries. UCI has some of the largest wild, native salmon returns in Alaska. ADF&G does not enumerate the return of all stocks but based on the actual harvest and research data, the 2014 returns of all UCI salmon stocks could be estimated at around 30,000,000 fish. After escapement needs (7,000,000), there were approximately 23,000,000 salmon available for harvest. Of the 23 million salmon available for harvest, only around 4.5 million were utilized.

These abundant salmon stocks should be available for harvest; however, the effects of current BOF and ADF&G management plans and policies result in over 80% of these stocks going unharvested. In 2014, about 88% of the Chinook, 19% of the sockeyes, 84% of the coho, 96% of the pinks and 87% of the chums were in excess of all harvests or escapement needs and not utilized.

Unharvested surplus salmon also cause much more variability in returns. These erratic returns are more difficult to predict, more difficult to manage to achieve escapement goals and, as ADF&G reports assert, are not sustainable (SP 07-17, FMS 14-06).

Fisheries management needs to be focused on fully utilizing these abundant renewable resources with the understanding that allocation and daily management decisions have direct economic consequences to the welfare of the state.

The unharvested surplus stocks represent millions of lost tax revenue dollars to the State Treasury, tens of millions of dollars in lost economic benefit to the regional economies, loss of food products and by-products, and lost jobs. These same non-utilized salmon represent an opportunity for growth and diversification in local, regional and state economies.

The commercial sector is the only user group that has the capacity or the ability to harvest and monetize these surplus stocks, has over a 100 year history of doing so and all stocks remained healthy during this timeframe.

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