

PROPOSAL 26 - 5 AAC 58.060(a). Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend *Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan* to specify that the plan applies to king salmon of Cook Inlet spawning origin, as follows:

(1) the guideline harvest level is 3,000 king salmon **originating from Cook Inlet spawning aggregations;**

What is the issue you would like the board to address and why? This proposal would amend the guideline harvest level (GHL) in effort to clarify the plan guiding principle to manage wild king salmon “*originating from Cook Inlet spawning aggregations*” rather than non-Cook Inlet “feeder” king salmon comprising the bulk of the recreational catch in the Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery.

Alaska’s policy for regulation and management of sustainable salmon fisheries is recognized and appreciated, as is the need for specific guiding principles and criteria. (5 AAC 39.222) In light of this policy, the GHL is viewed as inconsistent and not proportionally related to advancement of the conservation standards contained in the sustainable salmon and mixed stock salmon policies. The present proposal is respectfully submitted in an effort to clarify the purpose and goal of the management plan in light of these policies. When the management plan was first implemented, the Board understandably adopted a precautionary approach, taking into account the then-existing uncertainties. In the ensuing years, those uncertainties have been greatly reduced and the all-encompassing scope of a blanket GHL is no longer justified.

The GHL set forth in the current management plan is not very effective for conserving Cook Inlet wild king salmon stocks of concern. The Lower Cook Inlet recreational troll king salmon fishery harvests primarily “feeder” king salmon that do not originate from Cook Inlet spawning aggregations. Rather, as fishermen have long known and science has recognized, these “feeder” king salmon originate from hatcheries in Southeast Alaska, British Columbia, Washington, Oregon and elsewhere. Great numbers of these “feeder” king salmon come to Lower Cook Inlet waters to feed on abundant bait resources in the area.

In addition to not providing any measurable benefit, the plan’s GHL is unduly restrictive and disproportionately burdensome on the Lower Cook Inlet salt water king salmon sport fishery and its participants’ opportunity to catch non-local “feeder” king salmon for consumption.

The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

The management plan’s GHL is unwarranted and inappropriate, particularly in light of the major proportion of this sport fishery’s harvest of king salmon that do not originate from Cook Inlet

spawning aggregations. Comparisons of Cook Inlet wild king salmon interceptions from various sources demonstrate the insignificant effect of this sport fishery on wild king salmon originating from Cook Inlet spawning aggregations.

The State of Alaska manages salmon populations to meet spawning (escapement) requirements first, allowing salmon that are surplus to escapement to be harvested in the commercial, sport, subsistence, and personal use fisheries. The Lower Cook Inlet recreational troll king salmon fishery has low to very low impact on wild king salmon originating from Cook Inlet spawning aggregations, especially during the management plan's "winter" period.

Accordingly, it is inappropriate and unnecessarily punitive to maintain this overly broad GHL to slow the growth in the sport harvest of king salmon in an effort to conserve specific Cook Inlet king salmon stocks of concern. This GHL imposes more conservation burden on the Lower Cook Inlet recreational troll king salmon fishery than is appropriate in full consideration of the fishery's very low impact on Cook Inlet king salmon stocks of concern.

Without the proposed change, the management plan will continue to unnecessarily and unfairly limit a sport fishery for catching primarily "feeder" king salmon originating from outside Cook Inlet and outside Alaska. This proposal seeks to help address the growing perception that this management plan punishes Alaska fishermen for catching non-Alaska fish.

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