PROPOSAL 100

5 AAC 21.360. Kenai River Late-Run Sockeye Salmon Management Plan.

Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to open commercial fishing periods to stay within ten percent of daily inseason run projections, as follows:

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. . .

- (b) The Kenai River late-run sockeye salmon commercial, sport, and personal use fisheries shall be managed to
 - (1) meet the sustainable escapement goal (SEG) range of 700,000-1,200,000 late-run sockeye salmon;
 - (2) achieve inriver goals as established by the board and measured at the Kenai River sonar counter located at river mile 19; and
 - (3) distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run; **and**
 - (4) manage and initiate allowable fishing times based on not exceeding a 10% margin of deviation above or below the calculated run size projection as it applies from day to day.

What is the issue you would like the board to address and why? For a great number of years the commercial division of fisheries for the Cook Inlet region has initiated early season management harvest strategies and fishing hours based on the pre-season forecasts. And as has been the case repeatedly in recent times, this initial aggressive harvest strategy based on theoretical expectations has resulted in major deficits in Kenai River late run Sockeye salmon early escapement numbers and major shortfalls based on realtime run projections.

5 AAC 21.360 (b) (3) mandates that the Kenai River late run sockeye salmon shall be managed to distribute the escapement of sockeye salmon evenly within the (SEG) range, in proportion to the size of the run.

The 21st century is creating management challenges unlike any the Department has had to face in the past. Climate change has created El Nino cycles with increasing frequency (every 3-4 years) and lasting 16 months or longer. Alaska has not escaped the detrimental impacts on our resources from ever-increasing ocean temperatures having significant effects on the food chain which equates to fewer returning salmon stocks in many years. Biologists have no control over the severity of these negative impacts on our fisheries nor do they have the means to assess potentially lower returning numbers in advance of the salmon returning to the region that may be a result of at-sea impacts from known and unknown variables.

So managing the commercial harvest of Cook Inlet - Kenai River sockeye salmon stocks at the front end of the run based on pre-season expectations is not a viable scientific method in today's world and results in excessive compensations in management harvest strategy as shortfalls in projection and escapement rise because the numbers supporting that method were not valid or dependable in the early season.

Note the word evenly in the AAC. We have not followed that requirement of the plan and have routinely over-harvested a disproportionate percentage of the front end of the run with this approach. With the flexibility of the management team to choose when and how often commercial fishing will occur, there is no reason not to adopt a scientific management plan based on realtime numbers for inriver counts and the day to day run projection. Minimizing excessive harvest actions and then compensations for shortfalls is a benefit to all three user groups - commercial, sport, & personal use. It is called more stability and reliability for users.

It is time to execute the Kenai River Late Run Sockeye Salmon Management Plan on the realtime numbers as they are available each day. The purpose of this proposed change is to manage commercial harvest fishing hours based on the Department's new goal to stay within a fixed amount of deviation from the daily realtime run projection without any speculation or unsubstantiated assumptions applied.