

PROPOSAL 212

5 AAC 21.358. Northern District Salmon Management Plan.

Adopt additional restrictions in the Northern District Salmon Management Plan as follows:

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(c) From June 25 until closed by emergency order one set gillnet not more than 35 fathoms in length per permit may be used;

(1) the department shall limit commercial fishing to the weekly fishing period. described in 5AAC 21.320 (a) (1).

(new) the commercial harvest shall not exceed 30% of the total Northern District coho salmon harvest.

[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 SUBDISTRICT 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 NOT MORE THAN 35 FATHOMS IN LENGTH.]

What is the issue you would like the board to address and why? After providing for stock conservation needs, the basic purpose of the Northern District Salmon Management Plan (Plan), is to provide a full season of reasonable harvest opportunity, uninterrupted by inseason restrictions/closures, for all user groups. The Plan primarily regulates the first inline and most efficient harvester within the Northern District, the Northern District set net fishery. Although there are less than 100 permit holders in this commercial fishery, the potential fishing power of the Northern District set net fishery is very great. Current regulations allow permitted fishermen to fish up to three large commercial gillnets, twice a week, over the entire season. Because of this fishing power, coupled with the lack of inseason abundance data, the Northern District set net fishery has repeatedly been allowed to overharvest specific salmon stocks to the detriment of escapement needs and/or the reasonable harvest opportunity for the inriver user groups, identified in the plan. This is clearly demonstrated by the consistent annual use of emergency order authority restrictions/closures on inriver user groups during the past two decades for conservation purposes. This form of management and the resulting continuing negative consequences on upstream inriver harvesters should not be tolerated by the Board of Fisheries. Conservation of the resource, as well as the benefits derived from the harvest of the resource should be allocated appropriately.

There needs to be recognition that coho salmon total run size has decreased that resulted in much lower inriver sport harvests of coho salmon during the past two decades. However, while sport harvests have decreased, the commercial fishery has generally maintained their harvests and consequently increased their allocation of the resource. Because of this, the inriver users in the NCIMA clearly have borne the brunt of conservation. Unlike prior to 2017, the allocation of coho salmon is currently dominated by the Northern District commercial fishery. The percent harvest of coho salmon harvest has more than doubled, as evidenced by the 5-year average percent harvest during the period 2002-2021. The percent commercial harvest during the 5-year period 2002-2006 was 28%, while the most percent commercial harvest during the most recent 5-year period, 2017-2021 was 59%. The commercial harvest has been dominant since 2017. Conversely, during the 5-year period, 2002- 2006, the sport harvest accounted for 72% of the Northern District coho salmon harvest, during the most recent 5-year period, 2017-2021, that percentage has plummeted to 41%. The commercial fishery should not be allowed to dominate the harvest when the Plan explicitly calls for the minimization of coho salmon harvest in the commercial set net fishery. This is an unauthorized reallocation of the coho salmon resource from the sport fishery to the commercial fishery. The Board should not tolerate such an unauthorized reallocation. The regulations that specify the number of nets allowed, and the number of periods per week needs to better reflect the salmon abundance, as well as the allocation among users, in conjunction with the purposes of the Plan. Accordingly, a set percentage that the commercial fishery could harvest from the Northern District coho salmon run should be established so that such an unauthorized allocation will not occur in the future.

In some areas of Alaska there are large abundances of harvestable surplus salmon where benefits can be maximized by harvesting most of the surplus with a commercial fishery(s), while allowing ample harvestable salmon surpluses for subsistence /personal use, sport, and guided sport uses. In these areas, commercial fishery periods are on a set schedule. As salmon runs decline and/or vary, commercial fisheries become more efficient, and the demand of inriver user groups grow, these set fishing-schedule areas are becoming fewer. With hundreds of thousands of residents and an abundance of summer visitors in the Northern Cook Inlet Management Area (NCIMA), the board has recognized that benefits from the salmon resource is better maximized by providing ALL USERS reasonable opportunity to harvest the Northern Cook Inlet harvestable salmon surplus. It may be time that the Northern District set net fishery schedule is abandoned. Currently, we believe that the current abundance-based commercial regulations are not working because of a lack of inseason sockeye and coho salmon run assessment. Basing or altering the fishing schedule on weir salmon passage data on rivers high in the drainage that are days or possibly weeks away from the commercial fishery is folly. As stated above, there needs to be regulations that better respond to varying levels of abundance, especially when salmon abundance is low. Because of the varying salmon run sizes we believe that managers cannot achieve the basic purpose of the plan by allowing the fishing schedule of two days per week without some alteration.

The Northern District set net fishery has the advantage of being the first user group to harvest salmon returning to the streams of the NCIMA. In addition to being first to harvest, as stated above, their harvesting potential is very great. Permit holders use gillnets; they have no daily or seasonal limits; they are basically guaranteed two fishing periods per week and may have the opportunity to use as many as three gillnets to harvest salmon. The most recent Northern District commercial harvest history shows hundreds of salmon per net are regularly harvested each period from July

20 through August 6. Accordingly, we encourage the Board to restrict the number of nets that can be used during commercial fishing period per permit holder for the entire fishing season to one net. Additionally, if projects indicate that salmon runs are low, restrictions in the commercial fishery should be commensurate with restrictions in the sport fishery. In other words, there should not be a guaranteed number of fishing periods per week when inriver users are restricted. However, we believe that a net restriction of one net per permit holder may provide increased inriver harvest opportunities throughout the season.

Reasonable and harvestable inriver abundance has been sorely lacking under current regulation, especially during early and late in the season. During years with larger salmon abundances, those fishing first inline, with the most efficient gear, and no harvest limits will catch more salmon. If commercial regulation were set at a more conservative level, and remained static for the season, all other users would also have a better opportunity of fishing on a proportionally similar harvestable surplus, as commercial users currently do, throughout the entire run. All would share a more similar harvest opportunity, share in conservation efforts, and resource benefit would be better apportioned for all the people.

PROPOSED BY: Gene Sandone

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