

PROPOSAL 214

5 AAC 21.358. Northern District Salmon Management Plan.

Adopt new 'paired restrictive' management measures for the commercial salmon set gillnet fishery within the *Northern District Salmon Management Plan* as follows:

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(c) From June 25 through July 13 one set gillnet not more than 35 fathoms in length per permit may be used; From July 14 through 19 two set gillnets not more than 105 fathoms in aggregate length per permit may be used; From July 20 - until the Susitna River personal use fishery is extended and Little Susitna River sport coho salmon fishery is liberalized, by emergency order, one set gillnet not more than 35 fathoms in length per permit in the General Subdistrict and up to two set gillnets not more than 70 fathoms in aggregate length per permit in the Eastern Subdistrict may be used; From when the Susitna River personal use and Little Susitna River sport coho salmon fisheries are liberalized by emergency order through when the Northern District set gillnet fishery is closed by emergency order; 2 set gillnets per permit not more than 70 fathoms in aggregate length may be used. From **June 25** [JULY 20] through **September 30** [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 **in portions or all of the Northern District** 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 that is not more than 35 fathoms in length.
- (4) Zero set gillnets — closure of specific area(s).**

What is the issue you would like the board to address and why?

Robust sport coho salmon fisheries and harvest opportunities have long been recognized throughout South central Alaska as a way to maximize benefit from one of the less abundant salmon species. They also provide a reasonable opportunity for most common users to put food in the freezer, and thereby, achieve some level of food security for a large portion of the year when most salmon stocks are unavailable for harvest.

Northern Cook Inlet produces some of the largest abundances of wild coho salmon in South-central Alaska, as evidenced by coho salmon harvests within the Northern District commercial set net fishery. Although one of the purposes repeatedly stated in the Northern District Salmon Management Plan is to minimize the harvest of coho salmon, Northern District permit holders regularly catch considerably more coho salmon on a per permit / per license basis than any other user group in Upper Cook Inlet. Furthermore, in the Northern District's General Subdistrict coho salmon are the most commercially harvested salmon species.

Some Northern District set netters present their fishery as a cottage industry having little impact on salmon stocks, and have proposed or supported expansions of commercial harvest opportunity for coho salmon. Since the 2000 — 2009 period the board has adopted some proposals that expanded Northern District set net harvest opportunity for coho salmon, and, while the Northern District commercial harvest of coho salmon has expanded, Alaska Department of Fish and Game (ADF&G) estimates for sport coho salmon harvests in the Northern Cook Inlet Management Area (NCIMA) have been reduced by approximately 50%. For the 10-year period from 2000 — 2009 NCIMA sport coho salmon harvests averaged over 80,000 fish per year, while for the most recent decade of data (2012 - 2021), sport coho salmon harvests within NCIMA have averaged around 40,000 fish per year.

With reduced sport harvests of both king salmon and coho salmon, the economic benefit provided from the NCIMA sport fisheries, has dwindled by tens of millions of dollars as documented from a 2007 ADF&G economic study with breakout of NCIMA figures, when compared to a 2017 economic study using the same study contractor and similar methodology commissioned by the Matanuska-Susitna Borough with money provided by the Alaska legislature.

This proposal seeks to update commercial harvest opportunities provided in the Northern District Salmon Management Plan to better match the plan's purposes statement — paragraph (a). Items of particular concern: 1. Providing a full season of shared chum, pink, and sockeye salmon harvest opportunity for commercial AND inriver uses based on abundance. 2. Managing chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon. 3. Allowing conservative reasonable harvest opportunities, that increase the likelihood of providing full seasons of harvest without inseason restrictions, and may provide expanded inseason harvest opportunities for ALL users.

Plan paragraph (b) specifies 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 — and also mentions using other abundance indicators as the department deems appropriate. At the start of the commercial season in June the weirs at Little Susitna River and Deshka River are already in the water, followed by the Fish Creek weir in early July. The Little Susitna, Deshka, and Fish weirs are considerably closer to saltwater and provide much earlier indices of inseason salmon abundance than Larson, Chelatna, and Judd weirs which are not even installed until later in the season. Whichever weirs are used — NONE of them measure any significant abundance of salmon, other than king salmon, until around mid-July, or later. If the purpose of providing a full season of shared harvest opportunity for both commercial and inriver uses is to be achieved, during this time of lower abundance into mid-July, commercial users should likely not be using 3 nets per permit.

With low abundances of king salmon, major Susitna River drainage sport fisheries and the Little Susitna River sport fishery have been regulated to no bait, single-hook artificial lures, and no harvest of king salmon through July 13. During this timeframe, other salmon are at low abundance levels, and may be just starting to arrive at the most significant Northern Cook Inlet sport fishery locations.

By regulation, the Fish Creek Personal Use Fishery may only open by emergency order starting July 15, and only after ADF&G projects sockeye escapement well into the Fish Creek sockeye salmon escapement goal range. Because of low early season sockeye salmon abundances, the earliest opening date in the past 10 years for the Fish Creek personal use fishery is July 19.

The Lower Susitna River Personal Use Fishery may not open until July 10 — and even then, reported personal use salmon harvests, for all salmon species, have been dismal during the first week the Susitna River personal use fishery is open. The point: is to provide a full season of realistic harvest opportunity for inriver uses, salmon must be allowed to migrate inriver, in reasonable numbers, early in the season, during the heart of the season, and later in the season.

Since there is no reliable abundance indicator of Susitna sockeye salmon, even by July 20, as measured at Larson, Chelatna, and Judd Lakes, it is nonsensical that the fishery be managed by an assessment of abundance, as outlined in paragraph (b) and (c) of the plan. It is only further nonsensical to suggest in this plan, that the Northern District set gillnet fishery could be opened to 2 or 3 set gill nets, per permit holder, specifically during the period of July 20 — August 6 without profound negative effects for achieving Susitna River sockeye salmon and Northern Cook Inlet coho salmon escapement goals, and without profound negative consequences to salmon harvests by inriver uses.

An examination of the past 20 fishing seasons reveals, one set gillnet throughout the entire General Subdistrict and up to two set gillnets per permit in the Eastern Subdistrict may be about the maximum that can be allowed, from July 20 — August 6, while somewhat consistently meeting the Susitna drainage (Larson, Chelatna, Judd) sockeye salmon escapement goals (without frequent inseason restrictions to inriver users). Since this or less Northern District effort has been the management net standard, best meeting escapement needs for over a decade, it should be adopted into standard regulation, while “REAL” net restrictions, meaning less nets, could be adopted, as a tool that may be utilized in the Northern District for addressing genuine “Emergency” escapement goal shortages throughout the entire season.

Since the plan specifically mentions minimizing the harvest of coho salmon, and providing sport, guided sport, and other inriver users a reasonable harvest opportunity over the entire run, there should be a standard for allowing an increased commercial net after July 30 (if it is allowed at all). Liberalized commercial net opportunity should only be allowed, when or after the Little Susitna River sport fishery and very-limited lower Susitna River personal use fishery have also been granted liberalized coho salmon harvest opportunities. The board has already set escapement-goal-oriented standards as to when the sport and personal use fishery may be liberalized; leaving commercial fishery emergency orders to be issued, without similar standards, places the manager, commissioner, department, and administration in an uncomfortable and awkward position — and only increases the likelihood of management inconsistency, and especially after an administration, commissioner, or manager change.

If there are enough coho salmon to provide an increased commercial net opportunity after July 30, then all other common users of the coho salmon resource should be provided a liberalized harvest opportunity at the same time. Currently the most appropriate trigger for providing liberalized Northern Cook Inlet salmon net harvest opportunity, after July 30, appears to be the Board-adopted standards for a lower Susitna River personal use season extension, and liberalization of the Little Susitna River sport coho salmon fishery. Note: the board-adopted standard for a liberalized Susitna

River personal use fishery requires inseason projections exceeding all Susitna River coho and sockeye escapement goals. This is an appropriate standard as it ensures all or nearly all inriver users should have some higher abundance of salmon to harvest, before a lower-in-the system intercept fishery takes a bigger bite out of the harvestable salmon surplus or possibly even escapement needs. Combining the personal use extension standard with the Little Susitna River sport fishery standard for liberalization is appropriate, because it ensures all or nearly all inriver users in Knik Arm should also have a solid coho salmon abundance — before the lower-in—the system commercial fishery takes an additional bite out of the resource. The most likely result of adopting these two standards to be met before expanding commercial netting opportunity, would be less or later expanded commercial net opportunity, at a time when coho salmon frequently dominate the Northern District set gillnet harvest. It would also provide inriver users a more reasonable coho salmon harvest opportunity, and inriver coho harvests may likely once again exceed the Northern District commercial coho harvest during most seasons.

Northern District commercial set gillnet regulations have varied considerably over time and during different portions of the season. With this variation history, the department could make some informed and reasonable assessments of how harvests may be adjusted by this proposal. For example: there is an abundance of fish, and some of the best commercial harvests of the season currently occurring during the July 20 - August 6 period, even with the entire General Subdistrict limited to one net per permit. In addition when the Coho salmon Conservation Plan was in effect, starting in 2000, there were several years where the entire Northern District commercial fishery was restricted to one net through August 10 (rather than August 1 or August 6) so harvest comparisons from this time period are also appropriate.

Some Northern District set netters have commented that they frequently only fish one net, even when allowed more. In the past (when king salmon were more plentiful) at least one Northern District set netter went on record stating that he frequently made about 1/2 of his commercial income for the summer during the king salmon fishery (a time when only one net and one weekly fishing period is allowed). The point is — Northern District salmon harvest would likely remain at a level where it has been sometime during the past 25 years, and while minimized to some extent, coho salmon harvest by Northern District set netters, on a per permit / license / or registration basis, would likely remain higher than any other Upper Cook Inlet user group — if this proposal were adopted as written.

What may be significantly reduced, during times of one net per permit holder, is drop out loss, something that sport fishery catch and release studies indicate may cause substantially more mortality with coho salmon than the other 4 salmon species. The more gillnets fished, the more coho salmon dropout / mortality losses likely increase.

2. What is the issue you would like the Board to address and why?

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PROPOSED BY: Alaska Outdoor Council

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