

*Northern District Commercial Salmon (11 proposals)*

**PROPOSAL 205**

**5 AAC 21.366. Northern District King Salmon Management Plan.**

Increase waters closed to commercial fishing for salmon in the Northern District King Salmon Management Plan as follows:

Modify the Northern District king salmon management plan to permanently close waters to the directed commercial king salmon fishery instead of being closed annually by emergency order.

5 AAC 21.366. Northern District King Salmon Management Plan.

(a) The purpose of this management plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions. The department shall manage the Northern District for the commercial harvest of king salmon as follows:

(1) except as specified in (8) of this section, the season will open for commercial fishing periods with the first fishing period beginning on the first Monday on or after May 25, except when May 25 falls within a closed period, in which case the season opens the next following open period and continues through June 24, unless closed earlier by emergency order;

(2) fishing periods are from 7:00 a.m. to 7:00 p.m. on Mondays;

(3) the harvest may not exceed 12,500 king salmon;

(4) set gillnets may not exceed 35 fathoms in length and six inches in mesh size;

(5) no CFEC permit holder may operate more than one set gillnet per permit at a time;

(6) no set gillnet may be set or operated within 1,200 feet of another set gillnet;

(7) no CFEC permit holder may set a gillnet seaward of a set gillnet operated by another CFEC permit holder;

[(8) FROM MAY 25 THROUGH JUNE 24, THE AREA FROM AN ADF&G REGULATORY MARKER LOCATED ONE MILE SOUTH OF THE THEODORE RIVER TO THE SUSITNA RIVER IS OPEN TO FISHING THE SECOND REGULAR MONDAY PERIOD ONLY;]

[(9) IF THE THEODORE, LEWIS, OR IVAN RIVER IS CLOSED TO SPORT FISHING, THE COMMISSIONER SHALL CLOSE, BY EMERGENCY ORDER, THE AREA FROM AN ADF&G REGULATORY MARKER LOCATED ONE MILE SOUTH OF THE THEODORE RIVER TO THE SUSITNA RIVER TO COMMERCIAL KING SALMON FISHING FOR THE REMAINDER OF THE FISHING PERIODS PROVIDED FOR UNDER THIS SECTION;]

(10) if the king salmon sport fishery on the Deshka River as described in 5 AAC 61 is

(A) conducted as a no bait fishery, the commissioner shall, by emergency order, reduce the time allowed per commercial set gillnet fishing period provided for in this section to no more than nine hours in duration, or from 7:00 a.m. until 4:00 p.m.;

(B) conducted as a catch and release fishery, the commissioner shall, be emergency order, reduce the time allowed per fishing period provided for in this section to no more than six hours in duration, or from 7:00 a.m. until 1:00 p.m.;

(C) closed, the commissioner shall close, by emergency order, the commercial king salmon fishery throughout the Northern District;

(11) [IF THE CHUITNA RIVER IS CLOSED TO SPORT FISHING, THE COMMISSIONER SHALL CLOSE, BY EMERGENCY ORDER,] the area from a point at the wood chip dock located approximately at 61° 02.77' N. lat., 151° 10.04' W. long., to the Susitna River **is closed** to commercial king salmon fishing for the [REMAINDER OF THE] directed king salmon fishery;

(12) if the inseason Deshka River run projection is below the sustainable escapement goal, the commissioner may, by emergency order, close the commercial salmon set gillnet fishery throughout the Northern District.

(b) The commissioner may depart from the provisions of the management plan under this section as provided in 5 AAC 21.363(e).

**What is the issue you would like the board to address and why?** Modify the Northern District King Salmon Management Plan to permanently close waters to the directed commercial king salmon fishery instead of being closed annually by emergency order.

At the 2011 board meeting, Theodore, Lewis, and Chuitna rivers king salmon were found to be a stock of management concern (SOC), resulting in board action to close the sport fishery on these rivers. In addition, the board also adopted a regulation that directed the department to close, by emergency order, the commercial fishery from the wood chip dock to the Susitna River when the sport fishery on the Chuitna River is closed. These marine waters are described by the department as the most productive Northern District waters for the commercial harvest of king salmon.

Because the sport fishery is closed under regulation and cannot be opened, the department is forced to issue an emergency order every year to close these marine waters. Cleaning up the regulatory language by eliminating unnecessary language will benefit the public, the department, and enforcement.

Part of cleaning up the regulation is deleting reference to waters 1 mile south of the Susitna River since that area is a subset of the waters that extend to the wood chip dock. Reference to this area is found under (8) and (9) of the management plan. Those two subsections are no longer necessary because the larger closed water area under (11) takes precedent. Repealing (8) and (9) simplifies the management plan and is just housekeeping.

**PROPOSED BY:** Tom Vania

(HQ-F23-089)

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## **PROPOSAL 206**

### **5 AAC 21.366. Northern District King Salmon Management Plan.**

Reduce the number of king salmon that may be commercially harvested in the Northern District of Upper Cook Inlet as follows:

5 AAC 21.366. Northern District King Salmon Management Plan.

(a) The purpose of this management plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department.

The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions. The department shall manage the Northern District for the commercial harvest of king salmon as follows:

- (1) except as specified in (8) of this section, the season will open for commercial fishing periods with the first fishing period beginning on the first Monday on or after May 25, except when May 25 falls within a closed period, in which case the season opens the next following open period and continues through June 24, unless closed earlier by emergency order;
- (2) fishing periods are from 7:00 a.m. to 7:00 p.m. on Mondays;
- (3) the harvest may not exceed [12,500] 2,000 king salmon;

**What is the issue you would like the board to address and why?** Modernize the Northern District king salmon commercial fishery harvest cap to reflect the modern-day commercial fishery and reduced king salmon production. The harvest cap of 12,500 king salmon was set back in 1986 and no longer is appropriate given all the significant changes to king salmon production and how the commercial fishery is prosecuted from 35 years ago.

The number of permit holders participating in this fishery rapidly declined beginning in 1993, which is the first year set gillnet fishermen were required to register (prior to fishing) to fish in one of three areas (ND, Upper Subdistrict, or Greater Cook Inlet) for the entire year. The registration requirement served to eliminate a common practice of fishing in multiple areas in UCI during the same year.

King salmon are also listed as a Stock of Management Concern for the Theodore River, Lewis River, Chuitna River, Alexander Creek, Willow Creek, Sheep Creek, and Goose Creek.

Annual Northern District directed commercial king salmon harvest averages:

- 1993–2007 = 2,373
- 2008–2011 = 2,246
- 2012–2018 = 1,309
- All Years = 2,067

The above harvest estimates are only for the directed commercial king salmon fishery and do not include an additional harvest of 200 – 500 king salmon in the subsequent Northern District sockeye salmon fishery. With only one period each week during the directed king salmon fishery, the department has ample time to collect harvest reports and close the season if the harvest cap is met.

**PROPOSED BY:** Tom Vania (HQ-F23-090)  
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**PROPOSAL 207**

**5 AAC 21.366. Northern District King Salmon Management Plan.**

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

**5 AAC 21.366. Northern District King Salmon Management Plan.**

(a) The purpose of this management plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions. The department shall manage the Northern District for the commercial harvest of king salmon as follows:

...

(3) the harvest may not exceed **15 percent of the total combined commercial and sport** [12,500] king salmon **harvest**;

...

(10) if the king salmon sport fishery on the Deshka River as described in 5 AAC 61 is

(A) conducted as a no bait fishery, the commissioner shall **close**, by emergency order, the commercial king salmon fishery throughout the Northern District; [REDUCE THE TIME ALLOWED PER COMMERCIAL SET GILLNET FISHING PERIOD FOR IN THIS SECTION TO NO MORE THAN NINE HOURS IN DURATION, FROM 7:00 A.M. UNTIL 4:00 P.M.];

(B) conducted as a catch and release fishery, the commissioner shall **close**, by emergency order, the commercial king salmon fishery throughout the Northern District; [REDUCE THE TIME ALLOWED PER COMMERCIAL SET GILLNET FISHING PERIOD FOR IN THIS SECTION TO NO MORE THAN SIX HOURS IN DURATION, FROM 7:00 A.M. UNTIL 1:00 P.M.];

(C) closed, the commissioner shall **close**, by emergency order, the commercial king salmon fishery throughout the Northern District;

...

(12) if the **preseason or** inseason Deshka River run projection is below the sustainable escapement goal, the commissioner **shall** [MAY], by emergency order, close the commercial salmon set gillnet fishery throughout the Northern District.

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

*5 AAC 21.366. Northern District King Salmon Management Plan. (a) The purpose of this management plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department.*

*The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions. The department shall manage the Northern District for the commercial harvest of king salmon as follows:*

The Northern District set gillnet fishery is currently dominating the harvest of king salmon returning to the Northern Cook Inlet Management Area (NCIMA) rivers and streams. However,

policy guidelines to the department to manage the Northern District king salmon stock are clear. Because the Northern District King salmon Management plan (Plan) specifically states that

*The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions.*

It appears to me that the current regulations are contrary to the intent of the Plan. As you can see, these policy guidelines prioritize this king salmon stock for sport and guided sport uses to provide these user groups with a reasonable opportunity to harvest these salmon. It further states that the department shall, not may, manage the Northern District king salmon stock primarily for sport and guided sport uses plan states, as the primary consumptive purpose. Therefore, I believe that when the sport fishery is prosecuted under catch-and-release regulations, allowing no reasonable opportunity harvest these salmon by the sport fishery, the commercial fishery should also be closed to harvest. Allowing the commercial fishery to have a harvest opportunity on this king salmon stock, when there is no reasonable opportunity for the sport fishery to harvest king salmon, is contrary to the Plan. However, it appears that current regulations allow the commercial harvest of king salmon even when the sport fishery is prosecuted under catch-and-release regulations. Under this scenario, the current regulations provide for a commercial king salmon harvest while excluding the sport and guided sport fisherman the opportunity to harvest these salmon. I believe that this is contrary to the overall guideline statement of the Plan.

Although there is some unknown mortality associated with catch and release, there is also an unknow mortality associated with dropouts of a gillnet set to catch king salmon. This gillnet-associated mortality is probably greater on the larger king salmon because the commercial fishery is restricted to a maximum mesh size of 6 in. stretch mesh and larger king salmon are usually not gilled in these nets. Experienced commercial fishermen, knowing that large kings are more susceptible to dropping out of a 6 in gillnet, carry a gaff to harvest the kings that may be dropping out of the net when the net is pulled. I believe that the mortality rate of kings that drop out of a gillnet, especially larger kings, is much higher than those that die from a catch and release fishery. This is especially so, because the king salmon caught in a sport fishery are not allowed to be taken out of the water if that fish is to be released.

The consistency of the commercial harvest while the sport fishery has plummeted essentially increases the proportion of commercial harvest and allocation. From 2000-2009, the Northern District set gill net king salmon fishery accounted for an average of approximately 10% of the total king salmon harvest. For the most recent two years, 2020 and 2021, this commercial fishery accounted for 67% and 61%, respectively, of the total Northern District king salmon harvest. This is a reallocation of the king salmon harvest that was not sanctioned by the Board through changes in the Northern District king salmon management plan. As stated in the Plan, the Northern District king salmon stock is to be managed primarily...*to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions.*

Accordingly, it seems to me that since the commercial fishery has been harvesting more fish than the sport fishery, the management Plan of this stock need immediate adjustment. The commercial fishery should not dominate the harvest of this designated sport fish stock.

King salmon stocks throughout the state are in decline with decreasing average size and, most likely, decreased female salmon fecundity. We need to be more conservative on these stocks and ensure that the low end of the escapement range goals is met, if not exceeded. When a small harvestable surplus is projected, management of this resource should be precautionary. Allowing a commercial fishery, which has a great harvest potential, on a small projected available surplus may result in over harvest. If overharvest occurs then there may be little or no opportunity for sport and sport guided to reasonably expect to harvest king salmon.

Restricting the sport fishery to bait indicates that there is a small harvestable surplus. A small harvestable surplus should not be primarily taken with commercial gillnet fishing power. Additionally, there is a high probability that the commercial fishery would take a disproportionate amount of this small harvestable surplus. I believe that this is contrary to the Plan. In addition to the much greater harvest potential of commercial gillnets, there is an unknown, and probably relatively high mortality rate associated with the drop out of king salmon from the commercial gillnets. Restricting the sport fishery to catch-and-release indicates that there is an even smaller harvestable surplus. This surplus is basically the mortality associated with this fishing/catching technique. Allowing a commercial fishery on this very small harvestable surplus of a stock that is primarily managed for sport fisheries, exacerbates the above-mentioned problem with allowing a harvest-oriented commercial fishery on a small harvestable surplus.

Because the king salmon is designated as a sport fish, I propose that the commercial fishery for king salmon be closed when the sport fishery is restricted to no bait, and of course, catch and release. This would be more in line with the Plan purpose. Allowing a commercial fishery on a small and very small harvestable surplus is contrary to the Plan, contrary to the precautionary principal because there is a very real possibility of overharvest by the commercial fleet and may result in additionally sport fish restrictions and ultimately not meeting escapement goals. Further, if the preseason or inseason Deshka River king salmon run size projection is below the sustainable escapement goal, the commissioner SHALL close the commercial salmon set gillnet fishery throughout the Northern District. I believe that the department should not have any option to prosecute a commercial fishery on this stock if escapements are projected not to be met. Further, waiting for an inseason project of run strength when the preseason projection is poor is contrary to the Plan and the precautionary principle and will most likely result in poor salmon management with escapements not being met. Escapement is the priority.

Finally, since this stock should be managed primarily for sport fisheries, I suggest that a guideline apportionment for the commercial fishery be established that is reflective of all run sizes, and not as currently stated in 5 AAC 21.366(a)(3), the (commercial) harvest may not exceed 12,500. Note that since 2000, the commercial harvest has ranged from 141 king salmon in 2018 to 4,261 king salmon in 2006. Starting in 2000, the five-year average harvest percent that the commercial fishery has harvested has been steadily increasing, ranging from 6% during the 5-year period 2000-2004, to 26% during the final 5-year period, 2015 to 2019. I did not include the most recent two years, 67% in 2020 and 61% in 2021, because these years were extraordinarily high mainly because the

sport fishery was restricted in those years. In these two years, it is obvious that the management of the Northern District king salmon stock was not managed according to the overarching purpose statement of the Plan. Accordingly, I suggest that the Northern District commercial harvest not exceed 15% of the total combined Northern District commercial and sport fish king salmon harvest.

**PROPOSED BY:** Gene Sandone

(HQ-F23-092)

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## **PROPOSAL 208**

### **5 AAC 21.366. Northern District King Salmon Management Plan.**

Restrict the commercial king salmon fishery in the Northern District as follows:

(10) if the king salmon sport fishery on Deshka River, **Susitna River Drainage Unit 2, Unit 4, Unit 5, or Little Susitna River** as described in 5 AAC 61 is

...

(B) conducted as a catch and release fishery, **or closed**, the commissioner shall, by emergency order, **close the commercial king salmon fishery throughout the Northern District;** [REDUCE THE TIME ALLOWED PER FISHING PERIOD PROVIDED FOR IN THIS SECTION TO NO MORE THAN SIX HOURS IN DURATION, OR FROM 7:00 A.M. UNTIL 4:00 p.m.:]

[(C) CLOSED, THE COMMISSIONER SHALL CLOSE, BY EMERGENCY ORDER, THE COMMERCIAL KING SALMON FISHERY THROUGHOUT THE NORTHERN DISTRICT;]

**What is the issue you would like the board to address and why?** Although the purpose of the Northern District King Salmon Management Plan is to ensure an adequate escapement of king salmon into the Northern District drainages and provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guide sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inseason restrictions.

With what the department has identified as a downturn in saltwater production, in the last decade there have been inseason restrictions and / or closures to Northern District drainages every year. In 2021 sport fishermen could not harvest a king salmon from any of the wild stock Northern District drainages until June 18. In 2022 there was zero opportunity for sport anglers to harvest a king salmon from any Northern District fishery other than the hatchery fisheries at Ship Creek and Eklutna Tailrace / Knik River. In addition at the last Upper Cook Inlet Board of Fisheries meeting, directed king salmon harvest by the Northern District commercial fishery was expanded to allow commercial harvest of king salmon at times when the Northern District sport fisheries targeting wild king salmon were restricted to catch and release fishing.

The current stipulations of the management plan appear to defy the purpose of the plan as identified in the first paragraph. 1. More specifically the commercial harvest, provided in the plan, is at times (most years) exacerbating king salmon escapement shortages — rather than ensuring adequate king salmon escapement. 2. With the plan allowing commercial harvest, when the sport fishery is closed to harvest, it appears the fishery is managed primarily for commercial uses — instead of sport and guided sport uses as identified in the plan. 3. If the purpose is to provide sport and guided sport fishermen a reasonable opportunity to harvest king salmon over the entire run — then allowing commercial harvest when sport harvest is closed only increases the likelihood that ZERO sport harvest may be allowed over the entire run in more drainages (as occurred in 2022). Note: significant king salmon producing drainages that provided zero sport king salmon harvest during 2022 include Little Susitna River, Susitna River drainage Units: 1 (Deshka River), Unit 2 (Willow, Little Willow, Sheep, Goose and Montana Creek, and Kashwitna River), Unit 4 Yentna River (Lake and Peters Creek and Talachulitna River), Unit 5 Talkeetna River (Clear and Prairie Creek).

We request the Board consider more conservative management of the commercial fishery — similar to what was regulation before the last Upper Cook Inlet Board of Fisheries meeting — but considering a more wholistic Northern District king salmon stock approach rather than only Deshka River king salmon.

**PROPOSED BY:** Matanuska Valley Fish and Game Advisory Committee (EF-F23-134)  
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**PROPOSAL 209**

**5 AAC 5 AAC 21.366. Northern District King Salmon Management Plan.**

Close the commercial king salmon fishery in the Northern District as follows:

All northern district King salmon directed fisheries shall be closed

**What is the issue you would like the board to address and why?** Close Northern district King Salmon gill net fishery This fishery was opened in the mid 1980's on the condition (presented by the Northern District Set Netters) that if there was ever not a harvestable surplus after the sport fishery harvest the fishery would be closed. It is on public record, and was brought up at previous BOF Meeting. This fishery should of been closed 20 years ago.

**PROPOSED BY:** Joe Hanes (EF-F23-135)  
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**PROPOSAL 210**

**5 AAC 21.358. Northern District Salmon Management Plan and 21.366. Northern District King Salmon Management Plan.**

Modify the Northern District Salmon Management Plan and Northern District King Salmon Management Plan as follows:

(b) the department shall manage the Northern District commercial salmon fisheries based on the abundance of sockeye salmon counted through the weir on Larson, Chelatna, and Judd Lakes, **and**



**based on the abundance of king, sockeye, and coho salmon counted through Little Susitna River weir** or other salmon abundance indices as the department deems appropriate.

**(1) commercial fishing within one statute mile of the Little Susitna River channel and terminus with saltwater as measured at mean lower low water may only be allowed by inseason emergency order as follows:**

**(A) through July 13, when the department projects the king salmon escapement to exceed the Little Susitna River king salmon SEG, and only if more than 1,000 sockeye salmon have also migrated through Little Susitna River weir.**

**(B) after July 14 when the department projects the coho salmon escapement through Little Susitna River weir to exceed the Little Susitna River coho salmon SEG, and only if more than 3,000 sockeye salmon have also migrated through Little Susitna River weir.**

**What is the issue you would like the board to address and why?** It is irresponsible, and contrary to direction provided in the Northern District Salmon Management Plan and Northern District King Salmon Management Plan, for salmon management to ignore low salmon abundances, declining sport salmon harvests, and a long history of restrictions and closures to inriver and commercial users — while at the same time allowing a liberal commercial opportunity to harvest all 5 species of salmon, without limit, and within one mile of the Little Susitna River terminus.

The easiest solution would be to close commercial fishing within one mile of the Little Susitna River terminus — adopting a closed waters regulation, consistent with what is provided around other streams with established salmon escapement goals, and draining into Upper Cook Inlet. I have no doubt that such a regulation could likely result in declined harvests for those currently commercial fishing within one mile of the Little Susitna River terminus. That is the whole point of such regulations — to avoid large and excessive harvests of specific salmon stocks as they stage in and around stream terminus areas.

Would it cause those currently fishing within one mile of the Little Susitna River terminus to cease business operation? Not necessarily. The last time I looked the only registered sites within the Susitna Flats statistical area were all located within one mile of the Little Susitna River terminus — this would leave the vast majority of this statistical area open to harvest — and while, as mentioned earlier, harvest may likely be less in other locations, salmon migrate and are available for harvest along the shorelines throughout the entire Northern District.

All or most fishers may prefer to fish in the best harvest locations — but because of conservation needs — and in order to provide legitimate harvest opportunities for other users — the best harvest locations or someone's favorite fishing spot, overtime may become closed to fishing. This can be seen in the Little Susitna River sport fishery after installation of the Alaska Department of Fish and Game (ADF&G) salmon counting weir. Standard closure area as listed in regulation below a weir is 300 feet — overtime waters closed to sport fishing below Little Susitna River weir have expanded to approximately 1,500 feet — 5 AAC 60.122 (9) (M). This section of water was a favorite fishing location for some anglers. Did its closure cause those people to cease fishing Little

Susitna River? Perhaps, but not necessarily. Just as would be the case in the commercial fishery, while maybe not as productive for catching salmon, many additional miles of water remain open to fishing and harvest.

While I believe closing waters within one mile of the Little Susitna River terminus to commercial fishing would better minimize the commercial harvest of Little Susitna River coho salmon, better conserve depressed Little Susitna River sockeye salmon, and be more consistent with regulation throughout the rest of Upper Cook Inlet, in case the board chooses to continue allowing commercial fishing within one mile of the Little Susitna River terminus, I propose setting some reasonable abundance standards, consistent with management plan purposes, as to when that more liberal commercial harvest opportunity could occur.

**PROPOSED BY:** Andrew Couch (EF-F23-054)  
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**PROPOSAL 211**

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

Repeal certain restrictive provisions of the Northern District Salmon Management Plan as follows:

5 AAC 21.358 Northern District Salmon Management Plan

Delete Section (c) in its entirety as it is not needed because in 2020 the Board of Fisheries removed the Susitna sockeye “Stock of Yield Concern.” The Northern District set net fishery would revert to normal management by the department where the department can manage the fishery by area, time, and gear restrictions based on stock abundance.

*Repealed*

~~(c) From July 20 through August 6, if the departments 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 get gillnets that are not more than 70 fathoms in aggregate length;~~
- ~~(3) one set gillnet that is not more than 355 fathoms in length;~~

**What is the issue you would like the board to address and why?** Gear restrictions in the Northern District of Upper Cook Inlet during the peak sockeye run in the Northern District.

In 2008, the Board of Fisheries designated Susitna sockeye as a “Stock of Yield Concern.” Associated with that designation was the authority for the Department to restrict the fishing gear in the Northern District set net fishery from July 20 to August 6. Subsequently, the majority of the Northern District has been restricted to one net during this period.

In 2020, the Board of Fisheries removed the Susitna sockeye as a “Stock of Yield Concern.” Also, in 2020, the Board of Fisheries approved a new and expanding mixed stock fishery in the lower Susitna mainstem prosecuted as a dip net fishery.

No corresponding action was taken to address the gear reduction in the commercial set net fishery at that time.

The commercial set net fishery has continued to have gear reduced to one net during the peak of the sockeye run from July 20 to August 6 for a sockeye stock that is no longer a “Stock of Yield Concern,” and on a stock for which the Board of Fisheries considered sufficient to open a new fishery in 2020.

The Northern District Set Netters would like the regulations to reflect the Board’s decision to remove the Susitna sockeye “Stock of Yield concern” designation and remove the regulatory Northern District restrictions during the July 20 to August 6 time period.

**PROPOSED BY:** Northern District Set Netters of Cook Inlet (HQ-F23-091)  
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**PROPOSAL 212**

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

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

5 AAC 21.358. Northern District Salmon Management Plan.

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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 (HQ-F23-093)  
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**PROPOSAL 213**

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

Adopt new ‘paired restrictive’ management measures for the Northern District commercial salmon set gillnet fishery as follows:

- (1) **(A) Starting August 1 through Until there is adequate projected coho and sockeye abundance to extend the Lower Susitna River Personal Use Fishery (as specified in 5 AAC 77.540 (h) (1)), the commercial fishery in the Northern District may use one set gillnet that is not more than 35 fathoms in length per permit holder.**

**What is the issue you would like the board to address and why?** Think of the Northern Cook Inlet salmon resource users as a family. One of the family's core values is sharing. As the family grows their value of sharing requires older individuals to allow newer family members a portion of the salmon resource, thereby reducing older members' shares to provide a portion for the new. There is lag time in resource sharing, as the youngest family members do not eat much, and the youngsters must also grow and develop their fishing skill, before they catch much. As the family expands, however, even if the salmon resource level remains constant, older members' portions continue to decline through time.

The Northern District Salmon Management Plan family has grown so large, and the shared resource portions so small, that over 99% — if not all members - are now more dependent on other food sources and means of employment than salmon. While some members have little fish interest, many continue to highly value the resource and traditional opportunities to fish, harvest, and enjoy meals of salmon. As a whole, the family desires to maintain their salmon resource and their shared traditional salmon-related opportunities.

The oldest family member, Subsistence, once harvested salmon throughout Northern Cook Inlet. As the family population exploded, Subsistence was banished from her home when a city called "NonSubsistence Area" grew around it. When Subsistence wanted to live and continue her traditions in what is now called a "Subsistence" area, she was made to beg, refused traditional use, and finally granted traditional use by separate court orders in two small portions of rural Northern Cook Inlet. Without further court order or board action, Subsistence Fishing has legally expired from the largest portion of her subsistence area.

Following Subsistence's untimely death, her son, Lower Susitna River Personal Use, was adopted at the 2020 Upper Cook Inlet Board of Fisheries meeting. The board allowed young Personal Use up to 7-days of July salmon harvest opportunity within a limited portion of Subsistence's rural area. An additional board stipulation would have allowed Personal Use to fish through August, if adequate salmon abundance could be projected at upriver locations. While that specific abundance of salmon may have been caught somewhere, it was never projected inriver, so Personal Use fished only during July.

In 2020, 2021, and 2022 Personal Use harvested modest numbers of salmon each year. Reading the family's salmon management plan, after his last abbreviated fishing season, Personal Use found a primary plan purpose was to provide inriver users a reasonable opportunity to harvest salmon resources over the entire run. "I am an inriver user," he thought, "but 3 years in a row, I could only harvest during July."

Personal Use inspected the plan closer along with other fishing regulations and concluded, specific family members (Subsistence, Personal Use, and Commercial permit holders) might be allowed larger harvest opportunities of the shared salmon resources. The intent of the plan, however, was to limit excessive commercial harvests — before they could reduce the more modest harvest opportunities of all other family members — and specifically, inriver users.

Within the plan Personal Use found three separate "minimize the harvest of coho salmon" passages and understood they were specifically referring to commercial harvest of coho salmon. Regulations

and management practices, however, were not even allowing enough coho salmon upriver for him to fish a single day in August. Commercial regulations and management practices, allowed increased number of commercial nets after July 30, even where and when coho salmon were likely to be the most abundant fish caught. Management to “minimize the commercial harvest of coho salmon” was clearly broken.

Lower Susitna River Personal Use realized lag time exists before regulations within the plan, could be updated to allow all inriver users more reasonable opportunity to harvest salmon resources “over the entire run.” While studying the plan, fishing regulations, and salmon resource management, he concluded that inriver family members (some with meager opportunity compared to his) were shouldering excessive conservation burden — and therefore, receiving less harvest benefit than they should.

In hopes of providing both adequate salmon for spawning escapement needs and more reasonable harvest opportunity over the entire run for all inriver users, Personal Use suggested an amendment to his family’s plan with his first fishery regulation proposal:

**PROPOSED BY:** South Central Alaska Dipnetters Association (EF-F23-065)  
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### **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:

5 AAC 21.358. Northern District Salmon Management Plan.

...

**(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 gill nets 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?

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

**PROPOSED BY:** Alaska Outdoor Council

(EF-F23-063)

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## **PROPOSAL 215**

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

Provide additional commercial fishing opportunity for salmon within the *Northern District Salmon Management Plan* as follows:

1 5AAC 21.358 Northern District Salmon Management Plan

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

**9 (c) Open Northern District statistical areas Trading Bay 247-10 and Tyonek 247-20 from 7am to 7pm for one additional period between July 4 and 14. Opening date to be determined by ADF&G commercial fishing biologists.**

**What is the issue you would like the board to address and why?** The first three Sockeye periods in the Tyonek/Trading Bay statistical areas have a limited catch of Sockeye and very few Chinook salmon. Every year between July 4-14 there is a considerable run of Beluga River/Coal Lakes Sockeye. The natal philopatry is self-evident to commercial fishermen north and south of the Beluga River. Those to the north see few if any Sockeye until July 14. Kenai tenders do not even head north of the Beluga, but service the south each period. Those south of the Beluga see limited catches during the first three periods and then from July 4-14 one good period before the Susitna run begins. In terms of catch numbers, the fishing goes from 100-200 fish to 800 or more and then back down to the 100-200 level. If nothing is changed, this run will continue to be hit or miss. This proposal would grant a reasonable opportunity to a dozen permit holders in this limited area to harvest a specific commercial species. This proposal will not impact Chinook, Sockeye, or Coho sports fisheries. High quality will be maintained with available slush-ice on anchored scows in place, so an additional period is not a problem for tendering from Kenai. Tenders carrying iced catches could head to Kenai on the ebb, then next day head north to the Tyonek area on the flood tide. This proposal will aid the economic viability to the Tyonek/Granite Point area during a time when we have been limited or closed for Chinook and have greatly reduced fishing time on Susitna Sockeye.

Other solutions considered would be a Wednesday Sockeye opening for the entire Northern District during the Sockeye season.

**PROPOSED BY:** Terry Jorgensen and Kevin Barksdale

(EF-F23-020)

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