

PROPOSAL 209 – 5 AAC 21.366. Northern District King Salmon Management Plan.

Repeal the *Northern District King Salmon Management Plan*, as follows:

Repeal 5AAC 21.366 Northern District King Salmon Management Plan in its entirety.

What is the issue you would like the board to address and why? The Northern District King Salmon Management Plan was drafted in 1986 in response to a projected return of Northern District king salmon so large that the sport fishery did not have the ability to harvest all the surplus king salmon using the regulations in place at the time. It is the only Upper Cook Inlet commercial fishery targeting early run king salmon, and the purpose of the plan is:

“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.”

For the past 5 years, as evidenced by the department closing or severely restricting sport king salmon harvest in all Northern District drainages where the sport fishery targets wild king salmon, the plan provisions allowing targeted commercial openings to harvest surplus king salmon no longer fit the stated purpose of the plan. It simply does not make sense to allow extra harvest by a small special interest group (only 40 - 60 registered Northern District permit holders) at the expense of all other Alaskans and visitors who would like to harvest a few king salmon, but have been shouldering more severe conservation restrictions and total harvest closures. Having already gone 4 years or more with sport king salmon harvests closed by emergency order starting in May on 13 of the 17 Northern Management Area streams with established king salmon spawning escapement goals, and emergency restrictions on the remaining 4 streams with king salmon escapement goals as well, it is long past time to remove the commercial opportunity to target Northern District king salmon before June 24 at a time when few other salmon are available for harvest. This would more closely align the Northern District commercial season with most other

commercial fisheries in Upper Cook Inlet. Northern District commercial fishermen could still participate in the sport and subsistence king salmon fisheries, and would still be able to harvest Northern District king salmon after June 24.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (EF-F16-057)

PROPOSAL 210 – 5 AAC 21.358. Northern District Salmon Management Plan. Repeal and readopt management plan to fully utilize surplus salmon stocks based on the abundance of salmon returning to the Northern District, as follows:

(Repeal and Readopt)

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

(a) The purposes of this management plan are to provide the department direction for management of Northern District of upper Cook Inlet salmon stocks. The department shall manage these chum, pink, and sockeye salmon stocks utilizing fishing time in 5 AAC 21.320(a)(1).

(b) 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 or other salmon abundance indices as the department deems appropriate.

(c) 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 District 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.

(d) In addition to the provisions specified in (b) and (c) of this section, the department shall manage the Northern District commercial salmon fisheries under the following constraints:

- (1) additional fishing periods, other than the weekly fishing periods described in 5 AAC 21.320(a)(1), may not be provided when coho salmon are expected to be the most abundant species harvested during that period; additional fishing periods may not be provided based on the abundance of Northern District coho salmon;

(2) after August 15, the department shall limit the harvest of coho salmon in the Northern District by limiting commercial fishing time to the weekly fishing periods described in 5 AAC 21.320(a)(1).

(e) The department shall, to the extent practicable, conduct habitat assessments on a schedule that conforms to the board's triennial meeting cycle. If the assessments demonstrate a net loss of riparian habitat caused by noncommercial fishermen, the department is requested to report those findings to the board and submit proposals to the board for appropriate modification of this management plan.

What is the issue you would like the board to address and why? The board, ADF&G and sport fishing enthusiasts have continued to interpret the "minimize" language in this and other plans as if each year it is necessary to again restrict the commercial harvest of all coho stocks as if it were a half life determination to get to zero. This was never the intent of this language, rather minimize was meant to indicate that the commercial fishery would not be given additional fishing periods targeting coho but that their catch during regular periods was not only permissible but expected. The departments own studies indicate that the Northern District commercial harvest of all stocks is extremely small and that the stocks of coho they are trying to protect Susitna and Little Susitna Rivers are through the Central District by August 1 and the Northern District a few days later. The Board has put punitive restrictions on the Northern District which benefit no one. What this continued myopic view has lead to large unharvested surpluses in many of the streams that are against the Alaska Constitution mandating that surplus renewable resources be made available to the public. The Alaska Supreme Court just weighed in on this subject stating that the salmon stocks in Cook Inlet had to be managed for escapement goals and sustained yield and that the Boards plans were nothing more than guidelines which should be ignored inseason by the department.

Unharvested surplus salmon describes those salmon in excess of escapement needs that are not harvested by commercial, sport or personal use fisheries. UCI has some of the largest wild, native salmon returns in Alaska. ADF&G does not enumerate the return of all stocks but based on the actual harvest and research data, the 2014 returns of all UCI salmon stocks could be estimated at around 30,000,000 fish. After escapement needs (7,000,000), there were approximately 23,000,000 salmon available for harvest. Of the 23 million salmon available for harvest, only around 4.5 million were utilized.

These abundant salmon stocks should be available for harvest; however, the effects of current BOF and ADF&G management plans and policies result in over 80% of these stocks going unharvested. In 2014, about 88% of the Chinook, 19% of the sockeyes, 84% of the coho, 96% of the pinks and 87% of the chums were in excess of all harvests or escapement needs and not utilized.

Unharvested surplus salmon also cause much more variability in returns. These erratic returns are more difficult to predict, more difficult to manage to achieve escapement goals and, as ADF&G reports assert, are not sustainable (SP 07-17, FMS 14-06).

Fisheries management needs to be focused on fully utilizing these abundant renewable resources with the understanding that allocation and daily management decisions have direct economic consequences to the welfare of the state.

The unharvested surplus stocks represent millions of lost tax revenue dollars to the State Treasury, tens of millions of dollars in lost economic benefit to the regional economies, loss of food products and by-products, and lost jobs. These same non-utilized salmon represent an opportunity for growth and diversification in local, regional and state economies.

The commercial sector is the only user group that has the capacity or the ability to harvest and monetize these surplus stocks, has over a 100 year history of doing so and all stocks remained healthy during this timeframe.

PROPOSED BY: Earl Young (HQ-F16-109)

PROPOSAL 211 – 5 AAC 21.366. Northern District King Salmon Management. Close the Northern District commercial set gillnet fishery until the first regular period after June 24, if the Susitna River sport fishery is restricted by emergency order, as follows:

Adjust the Northern District King Salmon Management Plan by adding:

(12) if the Susitna River drainage King salmon sport fishery is restricted by emergency order, the commissioner shall close by emergency order, the Northern District commercial set net fishery until the first regular period after June 24.

What is the issue you would like the board to address and why? The King Salmon sport fishery in the Susitna drainage has been highly restricted in the sport fishery due to low forecasts and returns. Based on King Salmon escapement surveys area wide, additional conservation measures outside of the sport fishery, are needed to ensure the perpetual sustainability of this run.

The Susitna Drainage contains 3 King Salmon stocks of concern- two of them sport fishing is no longer allowed, and the other harvest is prohibited.

PROPOSED BY: Ben Allen (EF-F16-115)

PROPOSAL 212 – 5 AAC 21.310. Fishing seasons. Close the commercial set gillnet fishery in the Northern District on August 15, as follows:

Amend the Northern District season to read:

(b) salmon may only be taken as follows:

(1) Northern District: from June 25 until [CLOSED BY EMERGENCY ORDER] **August**

15;

What is the issue you would like the board to address and why? The Northern District commercial fishing season should be more aligned with the Central District

Eastside. A season that runs through August 15 provides plenty of opportunity to harvest Northern District salmon stocks, identified in management plans, to be managed primarily for commercial uses. A season through August 15 would still allow a substantial Northern District commercial coho salmon harvest, but would be more consistent with intent language contained at in the Northern District Salmon Management Plan:

“(a) The purposes of this management plan are to minimize the harvest of coho salmon bound for the Northern District of Upper Cook Inlet and to provide the department direction for management of salmon stocks. The department shall manage the chum, pink, and sockeye salmon stocks primarily for commercial uses to provide commercial fisherman with an economic yield from the harvest of these salmon resources based on abundance. The department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport and guided sport fisherman a reasonable opportunity to harvest these salmon resources over the entire run, as measured by frequency of inriver restrictions, or as specified in this section and other regulations.” Consistent with the Eastside Central District set net seasons, a Northern District season through

August 15 would allow harvest of commercial stocks through the heart of the Northern District runs. Closing after August 15, would better minimize coho salmon harvest with less economic impact on harvests of primary commercial species.

If the Board is concerned about reasonable yields for ALL Upper Cook Inlet user groups, wouldn't it be more consistent with Upper Cook Inlet management plans and seasons to pass more salmon of all species into Northern District waters for harvest, rather than running Northern commercial harvests into September and taking a high proportion of coho?

PROPOSED BY: Alaska Outdoor Council (EF-F16-105)

PROPOSAL 213 – 5 AAC 21.358. Northern District Salmon Management Plan. Close commercial fishing within one mile of Little Susitna River when the Little Susitna River sport fishery is restricted to no bait, as follows:

Amend section (d) of the Northern District Salmon Management Plan by adding a new provision:

(3) when the Little Susitna River sport fishery is closed to use of bait, commercial fishing shall be closed within one mile of the Little Susitna River confluence with Knik Arm.

What is the issue you would like the board to address and why? Although the Northern District Salmon Management specifies that:

The Department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of in river restrictions,

the Little Susitna River sport fishery is restricted to artificial lures only from October 1 - August 5 as a conservation measure to ensure adequate escapement of king salmon, coho salmon, and in river species. At the same time commercial fishing is allowed to within 500 yards of the Little Susitna River confluence with Knik Arm. While the sport fishery is restricted by a bait closure for most of the season, the commercial fishery enjoys a more liberal harvest opportunity than exists around the confluences of most other significant Upper Cook Inlet salmon streams. This occurs despite the fact that ADF&G only manages for abundance of king salmon and coho salmon in the Little Susitna River, with no established goals for other salmon species, and with annual sockeye salmon weir counts of less than 1,600 sockeye per year in 2013, 2014, and 2015. Liberal commercial fishing near the Little Susitna River confluence with Knik Arm should not cause or contribute to restriction of the sport king salmon and sport coho salmon fisheries, which according to management plans, are to be managed to provide sport and guided sport fishermen a reasonable opportunity to harvest salmon resources. Liberal commercial harvest opportunity near the Little Susitna River confluence should also not contribute to depressed Little Susitna River sockeye salmon escapements. .

PROPOSED BY: Mat-Su Borough Fish and Wildlife Commission (EF-F16-034)

PROPOSAL 214 – 5 AAC 21.366. Northern District King Salmon Management Plan. Close commercial fishing within one mile of the Little Susitna River when more than half of Northern District streams with king salmon escapement goals are closed to sport harvest of king salmon or when the Little Susitna River sport fishery is restricted by emergency order, as follows:

Amend the Northern District King Salmon Management Plan by adding the following provisions:

(12) if more than half of the Northern District streams with king salmon escapement goals are closed to king salmon sport harvest; the commissioner shall close by emergency order, the Northern District commercial set net fishery until the first regular period after June 24.

(13) if the Little Susitna River sport fishery is restricted by emergency order: the commissioner shall close, by emergency order, commercial fishing within one mile of the Little Susitna River confluence with Knik Arm.

What is the issue you would like the board to address and why? The purpose of this 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.

During times of king salmon shortages in 2013, 2014, and 2015 the Matanuska Sustina Borough Fish & Wildlife Commission discovered the above preamble language within the Northern District King Salmon Management Plan did not adequately address how ADF&G shall manage the commercial fishery at times when: #1. More than half of the Northern District streams with ADF&G established king salmon es-capement goals were closed to king salmon sport harvest for

the entire year, yet the Northern District commercial fishery was allowed to continue harvesting king salmon bound for all drainages, and all emergency restrictions to the Northern District king salmon fishery were removed whenever bait fishing was allowed in the Deshka River. #2. the Little Susitna River sport fishery was restricted by emergency regulation but the commercial fishery was allowed to continue harvesting king salmon within a mile of the Little Susitna River confluence with Knik Arm. When the Little Susitna River sport fishery is restricted, why does the commercial fishery retain a liberal harvest opportunity on the same stock that the management plan stipulates be managed primarily for sport and guided sport uses?

PROPOSED BY: Mat-Su Borough Fish and Wildlife Commission (EF-F16-035)

PROPOSAL 215 – 5 AAC 21.366. Northern District King Salmon Management Plan. Close commercial fishing within one mile of the Little Susitna River, if the Little Susitna River king salmon sport fishery is restricted to harvest less than 7 days per week and artificial lures by emergency order, as follows:

Amend the Northern District King Salmon Management Plan by adding the following provisions:

(13) if the Little Susitna River sport fishery is restricted to harvest less than 7 days a week and artificial lures by emergency order: the commissioner shall close, by emergency order, commercial fishing within one mile of the Little Susitna River confluence with Knik Arm.

What is the issue you would like the board to address and why? The Little Susitna River King Salmon sport fishery is bearing the greatest burden of conservation during times of low abundance. During times of low abundance, King Salmon are being harvested within a mile radius of the Little Susitna River at the same time the Little Susitna River King salmon sport fishery has been under emergency order restriction.

Harvest in the Little Susitna River Sport fishery has been dramatically reduced since 2009. Opportunity and chance of catching and harvesting a King Salmon has been seriously altered. Significant efforts have been made in river in the sport fishery to reduce harvest under emergency order, by restricting harvest at least 3 days/week (4 days prior to 2016), mandating single hooks, reducing the annual limit 60% (only 2 fish), and increasing the weir boundary three more holes down the river to protect staging fish.

The one mile radius of the Little Susitna River's at its confluence with Knik Arm, is a major staging area, for King Salmon migrating up the Little Susitna River. Highest King Salmon abundance within the one mile radius of the Little Susitna River occurs in the first 3 weeks of June. Scientific studies on the Kenai Peninsula suggest King salmon behavior at the confluence in this one mile radius zone, would be to swim back and forth increasing susceptibility to commercial harvest in a set net.

With in season weir monitoring and Little Susitna King Salmon behavior, the Department of Fish and Game cannot accurately assess run strength until the third or fourth week June, depending on river conditions and King salmon behavior.

PROPOSED BY: Ben Allen (EF-F16-118)

(Proposal 216 was submitted by two proposers. The proposal and justification were the same and are listed below, along with the proposers.)

PROPOSAL 216 – 5 AAC 5AAC 21.350. Closed waters. Close waters within one-statute mile of the Little Susitna River to commercial fishing, as follows:

amend closed waters as follows:

(c) Northern District

(1) within one statute mile of the terminus of the following salmon streams:

(A) Swanson Creek

(B) Bishop Creek

(C) Three-mile Creek

(D) Chuit River

(E) Nikolai Creek

(F) McArthur River

(G) Little Susitna River

What is the issue you would like the board to address and why? The Little Susitna River sport fishery is without doubt one of the most heavily used and economically important coho salmon / king salmon sport fisheries draining into the Northern District of Upper Cook Inlet, yet sport fishing opportunities and the economic benefit from those opportunities must be restricted, in part, because of liberal commercial set net harvest area near the river terminus.

Other Northern District streams, of significantly less sport and economic importance than the Little Susitna River, have one statute mile closed waters around their terminus', and within the Northern District Salmon Management Plan direction is given that: "The department shall also manage the chum, pink, and sockeye salmon stocks to minimize the harvest of Northern District coho salmon, to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of inriver restrictions, or as specified in this section and other regulations."

It should be noted:

#1 The use of bait is closed by regulation in the Little Susitna River sport fishery from October 1 through August 5, and this greatly reduces participation in the sport fishery, reduces sport harvest, and retards economic impact from the sport fishery.

#2 ADF&G manages the Little Susitna River for king salmon and coho salmon abundance, and both species are noted in management plans to be managed primarily for sport and guided sport users.

#3 Even with a salmon counting weir in Little Susitna River, the department has no Little Susitna River spawning escapement goal for any salmon species other than king and coho.

#4 Little Susitna River is located further up Cook Inlet, so salmon bound for the Little Susitna River must already swim past more commercial nets than all the other Central District and Northern District streams which have one mile closed waters around their terminus’.

#5 Management of Little Susitna salmon stocks is primarily paid for with funds collected from the sale of sport fishing licenses, king salmon stamps, and federal matching moneys collected from taxes on fishing tackle, outboard motors, and fuel. In times of state economic down turn it is fiscally important to maintain or grow this stream of funding.

Therefore, to better follow Northern District Salmon Management Plan direction, to more equally share the conservation burden of Little Susitna king salmon and coho salmon stocks, and consistent with closed waters around other Northern District streams, Susitna Valley Fish and Game Advisory Committee requests that the board establish a one statute mile closed waters around the terminus of Little Susitna River .

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee & (EF-F16-056)
Alaska Sport Fishing Association (HQ-F16-002)

PROPOSAL 217 – 5 AAC 21.358. Northern District Salmon Management Plan. Remove the Eastern Subdistrict of the Northern District from commercial set gillnet restrictions that apply July 20–August 6, as follows:

5 AAC 21.358 Northern District Salmon Management Plan

(c) 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 General District of** 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 gillnets that are not more than 70 fathoms in aggregate length;
- (3) one set gillnet that is not more than 35 fathoms in length.

Other solutions considered:

1) Break down the GSI data further by each Northern District statistical area and de-couple specific statistical areas that catch a minority of Susitna sockeye stock. There are data reported in *Genetic Stock Identification of Upper Cook Inlet Sockeye Salmon Harvest, 2010* (Barclay, Habicht, Tobias, Willette. pp 12-13), showing that statistical areas 247-41, 247-42, and 247-43 in the General District (all three adjacent, and to the northeast of the mouth of the Susitna River) also harvest a minimal percentage of Susitna sockeye, as low as 3% of their annual catch. However, I only found these data reported for 2010.

2) Repeal subsection (c) of the NDSMP completely, based on the GSI data that show the very small percentage of Susitna drainage sockeye stocks harvested by all Northern District commercial fishermen (Total Harvest, Table 1).

3) Change the language of subsection (c) to give the commissioner more specific direction regarding the use of options (1), (2), and (3), so that option (2) may be a more realistic possibility - seeing as how it has never been used. This specific direction may come from specific conditions being met at the three weirs (JCL) the year before, or some averaging or combinations of several years past. And/or, it may need to involve specific direction from "other salmon abundance indices" as stated in the preamble to the NDSMP.

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

Background: The Alaska Department of Fish and Game (ADF&G) manages the Northern District commercial set gillnet fishery primarily through provisions found in 5 AAC 21.358, Northern District Salmon Management Plan (NDSMP). The preamble of this plan states that the department shall manage the chum, pink, and sockeye salmon stocks primarily for commercial uses while at the same time minimizing the harvest of Northern District coho salmon. Furthermore, the plan states that the department shall manage the Northern District commercial sockeye salmon fisheries based on the abundance of sockeye salmon counted through the weirs on Larson, Chelatna, and Judd lakes (in the Susitna River drainage), or other salmon abundance indices as the department deems appropriate.

Currently, the entire Northern District setnet fishery, both the Eastern Sub-district and the General (western) Sub-district (AKA General District) (Figure 1), with all of their many distinct statistical areas, are generally both lumped together for most management actions. In other words, if the department needs to close or restrict one statistical area in the Northern District for conservation purposes, the regulations are such that the restriction or closure will be enforced for the entire Northern District set gillnet fishery.

(Point for clarification: Set gillnetting is the only commercial salmon fishery allowed in the Northern District. There is no drift gillnet fishery in the Northern District.)

The Issue and Proposal: In 2008, Susitna River sockeye salmon were classified as a stock of yield concern. As a result of this designation, the Board adopted the Susitna River Sockeye Salmon Action Plan that contained restrictive provisions to commercial fisheries to conserve this stock. These actions were later placed into subsection (c) of the NDSMP (5AAC 21.358 (c)). Every year since the adoption of subsection (c), the entire Northern District has been subject to gear

restrictions from July 20th to August 6th, which is the peak of the sockeye salmon run. Here is the current version of subsection (c).

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 District 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.

Since the adoption of this plan, the most restrictive option (3), the one-net-per-permit restriction, has been implemented every season. This 2/3 gear reduction occurs during the peak of the sockeye salmon run, negatively impacting the economic viability of the fishery for all Northern District fishermen.

Based on Genetic Stock Identification (GSI) data from sockeye salmon harvests in the Northern District which show the very low percentages of Susitna River sockeye harvested in the Eastern Sub-district (Table 1), this proposal seeks to provide ADF&G with more flexibility in their management of the Northern District setnet fishery by allowing them to de-couple the Eastern Sub-district from the General Sub-district for management actions, specifically with regard to 5AAC 21.358 (c).

Supporting Information and Data:

Table 1. GSI estimate of the number of Susitna River sockeye commercially harvested in the Eastern Sub-district of the Northern District, 2006-2013.

Year	Eastern Sub-district				General Sub-district				Total Susitna Run
	SusYen/J CL	Total Harvest	%	Harvest Rate	SusYen/J CL	Total Harvest	%	Harvest Rate	
2006	1,716	9,305	18%	0.40%	ND	3,159	30%	-	476,723
2007	1,260	9,222	14%	0.20%	ND	8,265	30%	-	595,276
2008	3,612	16,652	22%	0.80%	3,044	9,578	32%	0.70%	462,179
2009	1,139	18,057	6%	0.30%	5,866	22,595	26%	1.80%	332,279
2010	1,219	15,051	8%	0.40%	4,981	25,126	20%	1.60%	311,265
2011	696	9,945	7%	0.10%	10,610	25,515	42%	1.90%	548,799
2012	1,399	10,765	13%	0.40%	2,035	11,815	17%	0.60%	327,150
2013	1,205	11,037	11%	0.30%	5,526	12,386	45%	1.30%	426,647
Averages	1,531	12,504	12%	0.36%	5,344	14,805	30%	1.32%	435,040

The Susitna River is at the head of the General (western) Sub-district, entering Cook Inlet in its north-western corner. The Eastern Sub-district is on the other side of the inlet and is not geographically aligned with the Susitna river. This has long led Eastern sub-district fisherman to believe that they catch a minority of Susitna fish. GSI data of the commercial sockeye salmon harvest from 2006-2013 (Table 1) confirm this.

From 2006 to 2013 the average annual harvest of Susitna River sockeye salmon in the Eastern Sub-district of the Northern District was approximately 1,500 fish, representing only 12% of the Eastern Sub-district's total harvest. This means 88% of the fish caught in the Eastern Sub-district are bound for streams other than the Susitna - the system upon which the entire Northern District is currently being managed.

The same GSI data show that in the General Sub-district the average annual harvest of Susitna sockeye was approximately 5,300 fish – about 3.5 times the harvest of the Eastern Sub-district. However, within the NDSMP, restrictive actions to conserve Susitna River sockeye salmon lump the Eastern Sub-district together with the General Sub-district.

Additionally, and perhaps more pertinent, the GSI data show that on average, the Eastern Sub-district's total catch of Susitna River sockeye represents only 0.36% of the Susitna River's annual sockeye return (see Harvest Rate, Table 1).

Conclusion: Based on these GSI data, there should be allowance within the NDSMP for ADF&G to manage the Eastern and General sub-districts independently from each other, specifically with regard to subsection (c) of the plan. Since its adoption, this regulation has been used each season to require the Eastern Sub-district to be restricted to fishing with only 1 net/permit from July 20th through Aug 6th, which is the peak of the sockeye salmon run. The reason for this restriction is to conserve Susitna River sockeye salmon. However, as just noted, the GSI data in Table 1 show that the Eastern Sub-district harvests a statistically small number of sockeye salmon bound for the Susitna River, both as measured against Eastern Sub-district total harvests, or as the Harvest Rate of the total Susitna run.

The data are clear: The majority of the sockeye harvested by Eastern Sub-district fishermen are bound for other systems (88%) and the impact of the Eastern Sub-district on the Susitna sockeye run is miniscule (0.36%).

Therefore, Eastern Sub-district fishermen should not be held to the restrictions outlined in subsection (c) to conserve a stock of which they harvest only a very small portion.

This is why I am proposing that with regard to subsection (c), the Eastern Sub-district should be de-coupled from the General Sub-district, removing this restriction and allowing these fishermen to simply continue to fish their two, regularly scheduled 12-hr periods per week with a full complement of gear.

PROPOSED BY: Trevor E. Rollman (HQ-F16-081)

PROPOSAL 218 – 5 AAC 21.366. Northern District King Salmon Management Plan. Allow a holder of more than one Commercial Fisheries Entry Commission set gillnet limited entry permit to fish with one set gillnet per permit held in the Northern District, as follows:

Amend 5 AAC 21.366 (5) to read “No CFEC permit holder may operate more than one set gillnet **per permit** at a time.

What is the issue you would like the board to address and why? When the Northern District King Salmon Management Plan was adopted in November 1985, it contained language limiting the number of nets a person could operate in that fishery to one set net per permit. At that time, a person could only own and operate one SOH4 permit. In 2011, the Board of Fisheries allowed for a Cook Inlet set netter to own and operate two set gillnet permits (SOH4), making the current language in 5 AAC 21.366 (5) confusing and inconsistent with the intent of the regulation allowing a person to own and operate two set gillnet permits.

The current language in 5AAC 21.366 (5) states that “No CFEC permit holder may operate more than one set gill net at a time.”

This proposal is a bookkeeping measure to eliminate confusion in wording in the management plan, make the current language consistent with the original intent of the gear restriction, and make the two regulations consistent.

PROPOSED BY: Northern District Set Netters of Cook Inlet (EF-F16-114)
