

PROPOSAL 27 - 5 AAC 58.060. Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan by removing the guideline harvest level, as follows:

[(1) THE GUIDELINE HARVEST LEVEL IS 3,000 KING SALMON;]

What is the issue you would like the board to address and why? This proposal would remove the guideline harvest level (GHL) of 3,000 king salmon from the management plan. The GHL is viewed as unnecessary, overly broad, and not proportionally related to advancement of the conservation standards contained in the sustainable salmon and mixed stock salmon policies.

The present proposal is respectfully submitted in an effort to clarify the purpose and goal of the management plan in light of the best available scientific information. When the management plan was first implemented, the Board understandably adopted a precautionary approach, taking into account the then-existing uncertainties. In the ensuing years, those uncertainties have been greatly reduced and the GHL is no longer warranted.

Alaska's policy for regulation and management of sustainable salmon fisheries is recognized and appreciated, as is the need for specific guiding principles and criteria. (5 AAC 39.222)

The GHL set forth in the current management plan is not very effective for conserving Cook Inlet king salmon stocks of concern. The Lower Cook Inlet recreational troll king salmon fishery harvests primarily "feeder" king salmon that do not originate from Cook Inlet spawning aggregations. Great numbers of these "feeder" king salmon come to Lower Cook Inlet waters to feed on abundant bait resources in the area.

In addition to not providing any measurable benefit, the plan's GHL is unduly restrictive and disproportionately burdensome on the Lower Cook Inlet salt water king salmon sport fishery and its participants' opportunity to catch non-local "feeder" king salmon for consumption.

The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

The management plan's GHL is unwarranted and inappropriate, particularly in light of the major proportion of this sport fishery's harvest of king salmon that do not originate from Cook Inlet spawning aggregations. Comparisons of Cook Inlet king salmon interceptions from various sources demonstrate the insignificant effect of this sport fishery on king salmon originating from Cook Inlet spawning aggregations.

The State of Alaska manages salmon populations to meet spawning (escapement) requirements first, allowing salmon that are surplus to escapement to be harvested in the commercial, sport, subsistence, and personal use fisheries. The Lower Cook Inlet recreational troll king salmon

fishery has low to very low impact on king salmon originating from Cook Inlet spawning aggregations, especially during the management plan's "winter" period.

Accordingly, it is inappropriate and unnecessarily punitive to impose this GHM to slow the growth in the sport harvest of king salmon in an effort to conserve specific Cook Inlet king salmon stocks of concern. This GHM imposes more conservation burden on the Lower Cook Inlet recreational troll king salmon fishery than is appropriate in full consideration of the fishery's very low impact on Cook Inlet king salmon stocks of concern.

Without the proposed change, the management plan unnecessarily and unfairly limits a sport fishery for catching "feeder" king salmon originating primarily from outside of Cook Inlet and outside of Alaska. This proposal seeks to help address the growing perception that this management plan punishes Alaska fishermen for catching non-Alaska fish.

PROPOSED BY: Pete Zimmerman, spokesman for Cook Inlet Recreational Fishermen

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