

PROPOSAL 85 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal and readopt provisions (a)–(f) of the management plan and add provisions to manage the drift gillnet fishery to harvest surplus sockeye, pink, and chum salmon production and achieve escapement goals, as follows:

(Repeal and Readopt)

5 AAC 21.353 Central District Drift Gillnet Fishery Management

(a) The purpose of this management plan is to direct the harvest of surplus salmon in the Central District of UCI by the drift gillnet fishery. The department shall manage the drift gillnet fishery to harvest sockeye, pink and chum salmon stocks in UCI surplus to the escapement needs in order to achieve the various escapement goal ranges for these stocks. This plan does not provide for additional fishing periods directed at Susitna River, Little Susitna River or Kenai River coho salmon stocks. The department shall manage the Central District commercial drift gillnet fishery as follows.

(b) The fishery will be open for regular weekly fishing periods as described in 5 AAC 21.320(b). The fishing season will open the third Monday in June or June 19, whichever is later.

(c) From July 1 through August 15,

(1) Fishing will be allowed with drift gillnets as described in 5 AAC 21.320(b)(1).

(2) The fishing periods set forth in (1) of this subsection may be modified by emergency order based on the abundance of sockeye, pink and chum stocks.

(d) If additional fishing time is necessary to harvest surplus salmon it will be allowed in one or more of the following areas based on inseason salmon abundance by stock:

(1) Expanded Kenai Section

(2) Expanded Kasilof Section

(3) Anchor Point Section

(4) Drift Gillnet Area 1

(5) Central District

(e) From August 16 until closed by emergency order, drift gillnetting will be allowed in all waters of the Central District except those within 5 nautical miles of the Kenai Peninsula shoreline during regular fishing periods.

What is the issue you would like the board to address and why? Both the Board and department are charged with conservation and development of fisheries which has been defined as managing for escapement goals and sustained yield. The Board has put in place the most restrictive and unmanageable management plans in Cook Inlet in an effort to give nearly exclusive use of coho stocks in Cook Inlet to sport fishing interests. The department has failed to react inseason or to submit proposals to correct this excessive waste of the resources they are charged to protect. The need and success of this "experiment" is readily apparent when you look at the Little Susitna Coho salmon catch and escapement data. One of only two escapement goals for coho salmon in Cook Inlet where approximately 1,000 coho stocks are known.

The Little Susitna coho salmon escapement of 10,100 to 17,700 has exceeded the goal in 14 of 25 years by an average of 14,000 coho and only achieved the goal in 7 years. This system can not be managed with restrictions in the commercial fishery to pour more and more coho into this stream to achieve the escapement goal. It is obvious that the commercial restrictions are unnecessary and unwarranted in well over half of the years wasting hundreds of thousands of coho as well as sockeye, pink and chum salmon. In only 5 of 25 years of data was the goal not achieved, missing the lower end by an average of only 3,300 coho. This system is basically unmanaged and this needs to change. When you consider the fact that the Little Susitna is an index of other coho stocks, most with much less of an inriver exploitation the amount of overescapement, lost harvest and reduced production is staggering. Therefore, this proposal seeks to modify the overly restrictive provisions within the Central District Drift Gillnet Fishery Management Plan in order to: allow for flexible inseason management, provide a reasonable opportunity to harvest abundant sockeye, pink and chum salmon; and to provide adequate protection to northern bound sockeye salmon and coho salmon and Kenai River coho salmon. A companion proposal has been submitted under sport fishing regulations.

PROPOSED BY: Chris Garcia

(HQ-F16-107)

PROPOSAL 86 – 5 AAC 21.353. Central District Drift Gillnet Fishery. Amend provisions (a)–(f) of the management plan and add language to manage the commercial drift gillnet fishery based on the inseason abundance to meet escapement goals and harvest surplus salmon, as follows:

5AAC 21.353 Central District Drift Gillnet Fishery Management

(a)The purpose of this management plan is to provide the department with the ability to gather in-season data and to have the flexibility to use their in-season management tools to meet the escapement goals and to harvest the surplus salmon. The department shall manage the Central District commercial drift gillnet fishery as described in this section.

(b)The regular weekly fishing periods are as described in 5AAC21.320(b). The fishing season will open the third Monday in June or June 19, whichever is later.

(c) From the opening date as determined by 5AAC21.353 (b) until August 15,

(1) fishing will be opened for drift gillnets as described in 5AAC 21.320(b)(1).

(2) The fishing periods set forth in (1) of this subsection may be modified by emergency order;

(d) additional fishing time, based on in-season salmon abundance, needed to meet the objectives of harvesting the surplus salmon and staying within the escapement goals will be allowed in one or more of the following areas.

(1) Expanded Kenai Section of the Upper Subdistrict;

(2) Expanded Kasilof Section of the Upper Subdistrict;

(3) Anchor Point Section of the Lower Subdistrict;

(4) Drift Gillnet Area 1;

(5) Central District

What is the issue you would like the board to address and why? 5AAC 21.353. (a) through (f)

Prior to 1996 the central district drift gillnet fishery operated on a management plan of two twelve hour inlet wide weekly fishing periods. The plan worked as designed. The biologist had indices, from catch data, to know the size and location of the schools of salmon entering that year and could make sound scientific management decisions. Based on the in-season abundance count, salmon managers would open and close fisheries on a real time daily basis to ensure spawning escapements where adequate and to harvest the surplus salmon throughout the run to sustain production. Delegated emergency authority provided for immediate management decisions by area biologist. When runs were strong, managers liberalized harvest regulations to utilize surpluses. When runs were poor, managers closed fisheries to provide for predetermined escapement needs which ensure long-term sustainable yields. There was order, stability and predictability in the fisheries, fishery support businesses and the communities. This style of management is also mandated by the Constitution and the Magnuson Stevens Act (MSA). This successful management style is currently used in most areas of the State, It was also adopted by the Pacific Salmon Commission to manage and conserve salmon resources shared by Alaska, Oregon, Washington, and Canada, and worked well in Cook Inlet to achieve the escapement goals and allow all users an opportunity to utilize the surplus. The current version of 5 AAC21.353. central district drift gillnet fishery management plan is in violation of the constitutional mandate and does not allow adaptive in-season management. The plan makes it impossible for the biologist to know the run size and location or to manage for escapement goals or harvest the surplus. The result has been gross annual over-escapements and annual loss of harvest in the tune of millions of salmon and tens of millions of dollars. The resource, habitat, commercial and sports fishermen, processors, workers, industries, communities and the State are needlessly harmed. The constitution mandates that renewable resources "shall be utilized, developed and maintained on the sustained yield principle." Alaska law states: "The Commissioner shall manage, protect, maintain, improve, and extend the fish, game and aquatic plant resources of the state in the interest of the economy and general well being of the state... through rehabilitation, enhancement, and development programs. [the department must] do all things necessary to insure perpetual and increasing production and use of the food resources of state waters and continental shelf areas."

This proposal seeks to develop the central district drift gillnet management plan to be in compliance with the Constitution, MSA, Alaska statute and 5 AAC 39.222. This plan will give the biologist the flexibility and proven tools to perform in-season real-time abundance based management and to be effective in achieving the escapement goals and to harvest the salmon surplus. This proposal also seeks to provide a reasonable opportunity for all harvesters and to provide adequate protection for northern bound and central district salmon stocks. This proposal does not limit the commissioner's use of emergency order authority under AS 16.05.060.

PROPOSED BY: Central Peninsula Fish and Game Advisory Committee (EF-F16-145)

PROPOSAL 87 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.
Amend *Central District Drift Gillnet Fishery Management Plan* to maximize commercial harvest of sockeye salmon, as follows:

(a) The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District and Kenai River coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions. The department shall manage the Central District commercial drift gillnet fishery as described in this section **to maximize the commercial harvest of sockeye salmon.**

(b) The regular weekly fishing periods are as described in 5 AAC 21.320(b). The fishing season will open the third Monday in June or June 19, whichever is later.

(c) From July 9 through [JULY 15] **July 20, or until an inseason assessment of Kenai River sockeye salmon run strength is determined by the department,**

(1) fishing during the first regular fishing period and second regular fishing period is restricted to the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict and Drift Gillnet Area 1;

(2) at run strengths greater than 2,300,000 sockeye salmon to the Kenai River, the commissioner may, by emergency order, open one additional 12-hour fishing period in the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict and Drift Gillnet Area 1;

(3) at run strengths greater than 4,600,000 sockeye salmon to the Kenai River, the commissioner may, by emergency order, open additional 12-hour fishing periods in one or more of the following sections and areas:

(i) the Expanded Kenai Section of the Upper Subdistrict;

(ii) the Expanded Kasilof Sections of the Upper Subdistrict;

(iii) Drift Gillnet Area 1;

(iv) Drift Gillnet Area 2;

(4) Additional fishing time under this subsection is allowed only in the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict.

(d) From [JULY 16] **July 20** through July 31,

(1) at run strengths of less than 2,300,000 sockeye salmon to the Kenai River, fishing during all regular 12-hour fishing periods will be restricted to the Expanded Kenai and Expanded Kasilof Sections for the Upper Subdistrict;

(2) at run strengths of 2,300,000–4,600,000 sockeye salmon to the Kenai river,

(A) fishing during [ONE] **all** regular 12-hour fishing period per week will be [RESTRICTED TO ONE OR MORE OF] **opened in the following sections and areas:**

- (i) Expanded Kenai Section of the Upper Subdistrict;
- (ii) Expanded Kasilof Section of the Upper Subdistrict;
- (iii) Anchor Point Section of the Lower Subdistrict;
- (iv) Drift Gillnet Area 1;

(B) [THE REMAINING WEEKLY 12-HOUR REGULAR FISHING PERIOD WILL BE RESTRICTED TO ONE OR MORE OF THE FOLLOWING SECTIONS:] **Additional fishing time under this subsection is allowed in one or more of the following sections:**

- (i) Expanded Kenai Section;
- (iii) Expanded Kasilof Section;
- (iii) Anchor Point Section
- (iv) Drift Gillnet Area 1**

(3) at run strengths greater than 4,600,000 sockeye salmon to the Kenai River, [ONE REGULAR 12-HOUR FISHING PERIOD PER WEEK] **all regular** fishing periods per week will be restricted to **one or more of the following areas or sections:**

(A) Expanded Kenai Section;

(B) Expanded Kasilof Section;

(C) Anchor Point Section;

(D) Drift Gillnet Area 1;

(E) Drift Gillnet Area 2;

(F) Central District;

(4) additional fishing time under this subsection is allowed only in one or more of the following **areas or** sections:

- (A) Expanded Kenai Section;
- (B) Expanded Kasilof Section;
- (C) Anchor Point Section;
- (D) Drift Gillnet Area 1;**
- (E) Drift Gillnet Area 2;**
- (F) Central District;**

(e) From August 1 through August 15, **on Kenai River sockeye salmon runs under 2,300,000 fish,** there are no mandatory area restrictions to regular fishing periods, except that if the Upper Subdistrict set gillnet fishery is closed under 5 AAC 21.310(b)(2)(C)(iii), or the department determines that less than one percent of the season's total drift gillnet sockeye salmon harvest has been taken per fishing period for two consecutive fishing periods in the drift gillnet fishery, regular fishing periods will be restricted to Drift Gillnet Areas 3 and 4. In this subsection, " fishing period" means a time period open to commercial fishing as measured by a 24-hour calendar day from 12:01 a.m. until 11:59 p.m. **On Kenai runs over 2,300,000 fish, from August 1 through August 15, there are no mandatory area restrictions to regular fishing periods.**

(f) From August 16 until closed by emergency order, Drift Gillnet Areas 3 and 4 are open for fishing during regular fishing periods.

What is the issue you would like the board to address and why? At the 2014 Alaska Board of Fisheries (BOF) meeting for Upper Cook Inlet (UCI) finfish, restrictions were added to the Central District Drift Gillnet Fishery Management Plan that make this plan very inflexible and significantly changed the intent of the plan from when it was adopted in 1999. This proposal seeks some relief from these overly burdensome restrictions so that the drift plan is more in line with 5 AAC 21.363 (a) (1), where it states that the harvest of UCI salmon should be allowed in order to maximize the benefits of these resources. The current drift gillnet management plan is too restrictive and does not allow ADF&G the tools it needs in order to harvest surplus Kenai and Kasilof river sockeye salmon stocks. An overly restrictive drift gillnet management plan can therefore result in over escapement of these stocks, which it has in two out of two years since the plan was changed. Over escapement results in immediate loss to fish harvesters of all sectors and it also poses unneeded economic loss to the people of Alaska by not maximizing the benefits of these resources!

Therefore, I urge the BOF to carefully consider providing ADF&G with as many flexible management tools as necessary to ensure the future health of our salmon resources by crafting management plans that are more flexible and less restrictive. Overly-restrictive management plans often hinder our manager’s ability to do their most important job, i.e., managing fisheries to meet established escapement goals.

PROPOSED BY: David Hillstrand (HQ-F16-043)

PROPOSAL 88 – 5 AAC 21.353. –Central District Drift Gillnet Fishery Management Plan. Remove restrictions to the commercial drift gillnet fishery, so that the fishery would occur during two inlet-wide fishing periods based on test fishery and escapement data, as follows:

Drift fishing open Inlet-wide 7 – 7 Mondays and Thursdays

Additional time in restricted areas based on test boat data and abundance

What is the issue you would like the board to address and why? Drift Fishery – Area H area restrictions.

2014 restrictions are wasteful, costly to fishermen and processors, board generated

PROPOSED BY: John McCombs (HQ-F16-087)

PROPOSAL 89 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Repeal and readopt *Central District Drift Gillnet Fishery Management Plan* with the amended plan removing mandatory time and area restrictions from July 1–August 15, as follows:

Repeal and readopt sections of 5 AAC 21.353, and renumber remaining sections (g-h) to (f-g) to read:

5 AAC 21.353 Central District Drift Gillnet Fishery Management

(a) The purpose of this management plan is to direct the harvest of surplus salmon stocks in the Central District of Upper Cook Inlet by the drift gillnet fishery. The department shall manage the sockeye, pink and chum salmon stocks primarily for commercial uses to provide commercial fishermen with an economic yield from the harvest of these salmon resources based on abundance. This plan does not provide for additional fishing periods directed at Susitna River coho, Little Susitna River coho, or Kenai River coho salmon stocks. The department shall manage the Central District commercial drift gillnet fishery as follows;

(b) The fishery will be open for regular weekly fishing periods as described in 5 AAC 21.320(b). The fishing season will open the third Monday in June or June 19, whichever is later.

(c) From July 1 through August 15,

(1) Fishing will be allowed with drift gillnets as described in 5 AAC 21.320(b)(1).

(2) The fishing periods set forth in (1) of this subsection may be modified by emergency order;

(d) If additional fishing time is necessary to harvest surplus salmon, it will be allowed in one or more of the following areas based on inseason salmon abundance:

(1) Expanded Kenai Section

(2) Expanded Kasilof Section

(3) Anchor Point Section

(4) Drift Gillnet Area 1

(5) Central District

(e) From August 16 until closed by emergency order, drift gillnetting will be allowed in all waters of the Central District except those within 5 nautical miles of the Kenai Peninsula shoreline during regular fishing periods.

What is the issue you would like the board to address and why? From July 9–31, the Central District drift gillnet fishery is managed primarily by provisions found in the *Central District Drift Gillnet Fishery Management Plan* 5 AAC 21.353(c),(d) and (e). This plan was most recently modified in 2014 and is now the most inflexible and restrictive version of this plan since its adoption in 1999.

As currently written, the restrictive provisions prevent adaptive inseason management resulting in lost harvest opportunity and the over escapement of Kenai and Kasilof river sockeye salmon stocks. These restrictive provisions also result in the lost harvest of abundant pink and chum salmon stocks. The original intent of these restrictions was to conserve sockeye salmon bound for the Susitna River; however, more recent science indicates the restrictions were based on faulty data and flawed assumptions. These restrictive provisions have also been made a surrogate for allocating northern bound coho salmon to inriver sport fisheries; this manipulation of the original intent uses the same flawed assumptions.

Genetic stock identification (GSI) data from the Anchor Point offshore test fishery (OTF) and the commercial drift harvest shows that there is no distinct temporal or spatial separation of Susitna River sockeye stocks from other sockeye salmon stocks as they migrate through the Central District. Moreover, there are no conservation concerns for Northern District coho salmon; in fact, since 1990, the Little Susitna coho salmon escapement goal has been met or exceeded 21 times in

26 years (81%). It is important to note that in most of the years where the Little Susitna coho salmon goal was met or exceeded, the drift gillnet fishery was prosecuted with far fewer restrictions than they currently have. Finally, the Kenai River late-run sockeye salmon inriver goal has been exceeded in 7 of the past 10 years while the Kasilof River sockeye salmon BEG has been exceeded in 9 of the past 10 years. Since these rivers are indices of escapements in other unmonitored systems it is likely that all systems are being under harvested by similar amounts resulting in lost harvests now and lower production in the future.

Because GSI data from the OTF and the commercial drift harvest show no one time period or any specific areas in the Central District where Susitna River sockeye salmon stocks separate themselves from east side Cook Inlet sockeye salmon, mandatory restriction on specific dates in July result in large escapements of sockeye salmon to the Kenai and Kasilof rivers while not providing any significant savings of sockeye salmon migrating north. Currently the drift fishery is restricted to Drift Area 1 and the Expanded Kenai and Expanded Kasilof sections for both regular fishing periods from July 9 to July 15. Then, from July 16 to July 31, ADF&G must restrict the drift fleet based upon the size of the sockeye salmon run to the Kenai River. At most, the drift fleet is allowed to fish in the middle of Cook Inlet no more than one day per week, regardless of how strong the sockeye salmon run is to the Kenai and Kasilof rivers. As noted above, the Kenai River sockeye salmon inriver goal and Kasilof River BEG have been exceeded 16 out of 20 years (combined). This needs to change in order to keep these and other stocks within sustainable levels.

This proposal seeks to provide ADF&G with more flexible use of the drift fleet in order to harvest abundant Kenai and Kasilof river sockeye salmon runs. If these changes are adopted, ADF&G will still retain its emergency order authority to restrict or close the drift fleet for sockeye and coho conservation when needed, keep in mind, northern Cook Inlet coho salmon escapement goals are being met or exceeded more than 80% of the time and Kenai sockeye inriver goals have been exceeded 100% of the time for the last 5 years.

Therefore, this proposal seeks to modify the overly restrictive provisions within the Central District Drift Gillnet Fishery Management Plan in order to: 1) allow for flexible inseason management; 2) provide a reasonable opportunity to harvest abundant sockeye, pink and chum salmon; and 3) to provide adequate protection to northern bound sockeye salmon and coho salmon and Kenai River coho salmon.

PROPOSED BY: United Cook Inlet Drift Association (HQ-F16-011)

PROPOSAL 90 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.
Remove restrictions on the commercial drift gillnet fishery from July 1–31 and manage the drift gillnet fishery based on inseason salmon abundance, as follows:

5 AAC 21.353(c)-(d) is repealed and readopted to read:

(c) From July 1 through July 31st

Fishing will be allowed with drift gillnets as described in 5 AAC 21.320(b)(1).

The fishing periods set forth in (1) of this subsection may be modified by emergency order.

(d) If additional fishing time is necessary to harvest surplus salmon, it will be allowed in one or more of the following areas based on inseason salmon abundance:

Expanded Kenai Section

Expanded Kasilof Section

Anchor Point Section

Drift Gillnet Area 1

Central District

What is the issue you would like the board to address and why? Repeal the regulations based on the Susitna Sockeye stock of yield concern and the Susitna Sockeye Salmon Action Plan (SSSAP). This action plan describes certain regulatory restrictions on the Central District Drift Gillnet fishery. The restrictions are found in 5AAC 21.353 (c) and (d). These regulations were based on data that was later proven to have been wrong. Since the data was wrong, the regulations need to be repealed.

In 2008, the BOF designated Susitna sockeye a stock of yield concern due to a chronic inability to meet the Yentna SEG (range 90-160,000) as measured by sonar. In 2009 that sonar system was determined by ADF&G (FMS 09-01) to be grossly underestimating the number of sockeye returning to the Susitna River system. The 2006-09 ADF&G escapement goal review for the Susitna River revealed that for the prior 27 years the Susitna River escapement goal had been met and exceeded. See Table 1 below.

In addition, there are at least 23 genetically different sockeye populations (ADF&G FMS 12-06) within the Susitna watershed. Each unique sockeye population has different characteristics and requirements. For example, some are lake spawners, some are tributary spawners, and some utilize the mainstem, its side channels, sloughs and tributary deltas. These populations are all individually affected by numerous other factors, e.g. run timing, water temperatures, northern pike, parasites, disease, in-stream water levels, beaver dams, culverts and other migration impedances.

The SSSAP makes several assumptions that we now know are incorrect; first, it treats Susitna sockeye as one salmon stock and assumes that all cause and effect relationships are the same. Second, the plan assumes that specific restrictions in time and area allowed for commercial fishing will result in conservation of Susitna bound salmon. This assumption is also wrong. Genetic stock identification (GSI) data from the Anchor Point offshore test fishery (OTF) and the commercial drift harvest shows that there is no distinct temporal or spatial separation of Susitna River sockeye stocks from other sockeye salmon stocks as they migrate through the Central District.

Therefore, all the regulations based on the Susitna Stock of Yield Concern and the SSSAP must be repealed.

This proposal will repeal the restrictive provisions within the Central District Drift Gillnet Fishery Management Plan in order to: 1) allow for adaptive inseason management; 2) provide a reasonable opportunity to commercially harvest abundant sockeye salmon; and 3) to provide adequate protection to northern bound sockeye salmon and coho salmon.

PROPOSAL 91 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.
Remove area restrictions imposed on the commercial drift gillnet fishery during July 9–15 and 16–31 time periods, as follows:

5AAC 21.353. Central District Drift Gillnet Fishery Management Plan

(c) From July 1 through July 31st

(1) The regular weekly fishing periods are as described in 5AAC 21.320(b)(1).

(2) the fishing periods set forth in (1) of this subsection may be modified by emergency order;

(d) additional fishing time, based on in season salmon abundance, needed to meet the objectives of harvesting the surplus salmon and staying within the escapement goals will be allowed in one or more of the following areas.

(1) Expanded Kenai Section of the Upper Subdistrict;

(2) Expanded Kasilof Section of the Upper subdistrict’

(3) Anchor Point Section of the Lower Subdistrict’

(4) Drift Gillnet Area 1;

(5) Drift Gillnet Area 2;

(6) Central District

[DELETE THE ENTIRE EXISTING SECTIONS OF (c) AND (d)]

What is the issue you would like the board to address and why? Repeal of the regulations based on the Susitna sockeye stock of yield concern is necessary because the restrictions have been proven invalid by the data collected since their implementations. The data used to create the restrictions found in 5AAC 21.353 (c) and (d) have been proven wrong. In fact the wrong data has been used for decades and unfortunately or suspiciously the wrong data is still being used even after the corrections were determined by ADF&G in their 2006-09 escapement review. The current data clearly puts these restrictions in violation of not meeting the requirements of 5AAC 39.222. Policy for the management of sustainable salmon fisheries, especially (a)(2) in formulating fishery management plans designed to achieve maximum or optimum salmon production;(a)(c)(3) (M) procedures should be implemented to regularly evaluate the effectiveness of fishery management and habitat protection actions; and (a)(c)(3)(P) the best available scientific information on the status of salmon populations and the condition of the salmon’s habitats should be routinely updated and subject to peer review. (a)(d)(2) in response to the department’s salmon stock status reports, reports from other resource agencies, and public input, the board will review the management plan, or consider developing a management plan, for each affected salmon fishery or stock; management plans will be based on the principles and criteria contained in this policy and will

(A) contain goals and measurable and implementable objectives that are reviewed on a regular basis and utilized the best available scientific information;

(B) minimize the adverse effects on salmon habitat caused by fishing;

(C) protect, restore, and promote the long-term health and sustainability of the salmon fishery and habitat;

(D) prevent overfishing; and

(E) provide conservation and management measures that are necessary and appropriate to promote maximum or optimum sustained yield of the fishery resource;

The current restrictions are also in violation of State fisheries policy, Article 8 of the Constitution and the Magnuson Stevens Act all of which require the best scientific information available in formulating fishery management plans designed to achieve maximum or optimum salmon production.

The escapement data that was used to create the regulations has been found to have been grossly undercounting the escapement by an average of around three hundred percent. This is not sustainable and is an unnecessary and unacceptable monetary loss to the State and fishing industries, along with the loss of a high quality and natural sustainable food source. It makes no sense, especially in this time of huge budget deficits, to continue poor stewardship of the resource in management plans that literally waste millions of dollars and millions of harvestable surplus salmon and jeopardizes future salmon returns.

This proposal uses the reliable scientific data to repeal the unfounded restrictions that make it impossible to harvest the surplus salmon, by allowing the biologist to implement in-season abundance based management and still provide sufficient protection for all central and northern bound salmon stocks.

PROPOSED BY: Central Peninsula Advisory Committee (EF-F16-120)

PROPOSAL 92 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.
Restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15, as follows:

Amend the Central District Drift Gillnet Fishery Management Plan as follows:

(e) from August 1 - 15, [THERE ARE NO MANDATORY AREA RESTRICTIONS TO REGULAR PERIODS,]

(1) fishing during both regular 12 hour periods per week will be restricted to one or more of the following sections: (A) Expanded Kenai Section; (B) Expanded Kasilof Section; (C) Anchor Point Section; (D) Drift Gillnet Area 1, except that if the Upper Subdistrict set gill net fishery is closed under 5 AAC 21.310(b)(2)(C)(iii), or the department determines that less than one percent of the season’s total drift gill net sockeye salmon harvest has been taken per fishing period for two consecutive fishing periods in the drift gill net fishery, regular fishing periods will be restricted to Drift Gillnet Areas 3 and 4. In this subsection, “fishing period” means a time period open to commercial fishing as measured by a 24-hour calendar day from 12:01 a.m. until 11:59 p.m.

(2) additional fishing time under this subsection is allowed only in one or more of the following sections: (A) Expanded Kenai Section; (B) Expanded Kasilof Section; (C) Anchor Point Section.

What is the issue you would like the board to address and why? While changes to the drift management plan adopted by the Board in 2014 have proven more effective in increasing

escapements of Northern District drainage salmon stocks during July and providing more reasonable harvest opportunities for Northern District user groups during July, management during 2015 proved the plan inadequate in continuing those benefits throughout August. As currently configured the plan allows unnecessary drift gillnet fishing in Drift Gillnet Area 2 during the first half of August, which jeopardizes both attainment of Northern District drainage salmon escapement needs and reasonable salmon harvest opportunities for Northern District and Northern District drainage user groups. As proven many times the drift fleet can harvest plenty of surplus Kenai River sockeye without corking off Northern District bound sockeye and coho salmon in Area 2. Therefore, to address Northern conservation concerns and to allow more reasonable Northern harvest opportunity for other user groups, this proposal seeks to amend the drift management plan in a manner that still maintains drift gill netters an extremely liberal opportunity to harvest surplus sockeye salmon during times of July and August abundance. Note: under this proposal even if the drift fishery was restricted under the 1% rule, the department could still allow the fleet to fish 7 days per week (5 days per week in the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections and 2 days per week in Drift Gillet Area 3 and 4 during a portion of the season when sockeye salmon abundance is in decline and coho harvests makes up an increasing portion of the drift catch).

Considering restrictions on other user groups during the August 1 - 31 timeframe, this proposal, if adopted, should increase the likelihood of attaining Northern District escapement needs, provide more reasonable harvest opportunity for Northern and other user groups, while retaining significant drift gillnet harvest opportunity during August. In short, such changes would better align the plan provisions with it's stated purpose:

“The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gill net fishery to minimize the harvest of Northern District and Kenai River coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions.”

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee (EF-F16-055)

PROPOSAL 93 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.

Amend preamble of management plan and restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1-15, as follows:

Amend sections (a) and (e) of the Central District Drift Gillnet Fishery Management Plan:

(a) The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gill net fishery to minimize the harvest of [NORTHERN DISTRICT AND KEANI RIVER] coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run,

as measured by the frequency of inriver restrictions. The Department shall manage the commercial drift gillnet fishery as described in this section.

(e) from August 1 - 15, [THERE ARE NO MANDATORY AREA RESTRICTIONS TO REGULAR PERIODS,]

(1) fishing during both regular 12 hour periods per week will be restricted to one or more of the following sections: (A) Expanded Kenai Section; (B) Expanded Kasilof Section;

(C) Anchor Point Section; (D) Drift Gillnet Area 1, except that if the Upper Subdistrict set gillnet fishery is closed under 5 AAC 21.310(b)(2)(C)(iii), or the department determines that less than one percent of the season's total drift gill net sockeye salmon harvest has been taken per fishing period for two consecutive fishing periods in the drift gill net fishery, regular fishing periods will be restricted to Drift Gillnet Areas 3 and 4. In this subsection, "fishing period" means a time period open to commercial fishing as measured by a 24-hour calendar day from 12:01 a.m. until 11:59 p.m.

(2) additional fishing time under this subsection is allowed only in one or more of the following sections: (A) Expanded Kenai Section; (B) Expanded Kasilof Section; (C) Anchor Point Section.

What is the issue you would like the board to address and why? The plan allows unnecessary drift gillnet fishing in Drift Gillnet Area 2 during the first half of August, which jeopardizes attainment of Northern District drainage salmon escapement needs and reasonable salmon harvest opportunities for other Upper Cook Inlet user groups. Looking at a map of Upper Cook Inlet that shows Drift Gillnet Area 2 and the Northern District, a person can visualize how effectively salmon can be blocked from Northern District waters by concentrated drift gillnet fishing in Area 2. Even if no drift gill netting were allowed in Area 2, individual drift gillnet permit holders would still get first harvest opportunity, in a much larger harvest area, using considerably more gear, fishing in a more mobile fashion, and with more commercial openings to harvest Northern District bound salmon compared to Northern District users.

As proven many times the drift fleet can harvest plenty of surplus Kenai River sockeye without corking off Northern District bound sockeye and coho salmon in Area 2. While addressing Northern conservation issues (Jim Creek coho salmon and stock of concern Susitna River sockeye salmon) and allowing more reasonable Northern harvest opportunity for all other user groups, this proposal also seeks to maintain drift gill netters a liberal opportunity to harvest surplus sockeye salmon during times of July and August abundance. Note: Even if the drift fleet was restricted under the 1% rule, the department could still allow the fleet to fish 7 days per week (5 days per week in the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections and 2 days per week in Drift Gillnet Areas 3 and 4 during a portion of the season when sockeye salmon abundance is in decline and coho harvest makes up an increasing portion of the drift catch). Just as the importance of sockeye salmon is recognized for commercial users throughout Upper Cook Inlet, so should the importance of coho salmon, throughout Upper Cook Inlet, be recognize for sport and guided sport users in a management plan.

Considering restrictions on other user groups during August, this proposal, if adopted, would increase the likelihood of attaining Northern District escapement needs, provide more reasonable harvest opportunity for other user groups, while retaining significant drift gillnet opportunity. Such

changes would better align the plan provisions with it's stated purpose: "The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gill net fishery to minimize the harvest of Northern District and Kenai River coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions."

PROPOSED BY: Alaska Outdoor Council (EF-F16-099)

(Proposal 94 was submitted by two proposers. The proposal and justification for each proposer is listed below.)

PROPOSAL 94 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan.
Remove the one-percent rule, as referenced to both the set and drift gillnet fisheries, from the Drift Gillnet Management Plan, as follows:

5AAC 21.353(e) Central District Drift Gillnet Fishery Management Plan

(e) From August 1 through August 15, there are no mandatory time or area restrictions to regular fishing periods. [, EXCEPT THAT IF THE UPPER SUBDISTRICT SET GILLNET FISHERY IS CLOSED UNDER 5 AAC 21.310(B)(2)(C)(III), OR THE DEPARTMENT DETERMINES THAT LESS THAN ONE PERCENT OF THE SEASON'S TOTAL DRIFT GILLNET SOCKEYE SALMON HARVEST HAS BEEN TAKEN PER FISHING PERIOD FOR TWO CONSECUTIVE FISHING PERIODS IN THE DRIFT GILLNET FISHERY, REGULAR FISHING PERIODS WILL BE RESTRICTED TO DRIFT GILLNET AREAS 3 AND 4. IN THIS SUBSECTION, "FISHING PERIOD" MEANS A TIME PERIOD OPEN TO COMMERCIAL FISHING AS MEASURED BY A 24-HOUR CALENDAR DAY FROM 12:01 A.M. UNTIL 11:59 P.M.]

What is the issue you would like the board to address and why? 5AAC 21.353(e)

In 2014 the BOF adopted the one percent rule on the drift gillnet fishery. The adoption of the one percent rule has no scientific or biological support. It is not used statewide and was strictly an arbitrarily and capriciously implemented allocation regulation. It is a backdoor approach by some special interest groups to close the commercial fishery in the first week of August. The current regulation failed to address the lost harvest of surplus salmon stocks in August and the impossibility of managers to manage for the escapement goals. In 2015 the UCI sockeye run was the latest on record. The Kenai River sockeye escapement was over two million. The Kenai and Kasilof Rivers received twice their biological escapement goals for sockeye. All sockeye and coho escapement goals were met with many systems grossly over-escaped. The surplus salmon were not harvested by anybody. The August chum and pinks runs are virtually un-harvested. August can have pink returns in the millions, but this regulation prevents their harvest. This is not sustainable. An example of how ludicrous this regulation is: Thirty local commercial drifters are fishing the two regular weekly 12 hour periods on Monday, August 3rd and again on Thursday, August 6th . The salmon escapement goals are met or exceeded for all salmon species. The coho

northern bound coho salmon, the Little Susitna River coho salmon escapement goal has been met or exceeded in 21 out of 26 years (81%) since 1990, even with an active drift gillnet fishery in August. See Table 1 below.

Both Kenai River and northern Cook Inlet coho salmon are afforded protection by the decreased participation in August in the Central District drift fishery. The one-percent rule needlessly prevents drift gillnet fishermen from harvesting surplus sockeye salmon in August. Coho salmon escapement goals have been met or exceeded in the Little Susitna River over 80% of the time, even when the drift fishery was allowed full participation in August. Therefore, in order to provide for a reasonable opportunity to harvest surplus sockeye salmon, this proposal seeks to remove the one percent rules that can unnecessarily restrict drift fishing in August. This proposal does not affect the ability of ADF&G to use its emergency order authority to restrict or close drift gillnetting in those years when coho salmon runs are weak.

Table 1. Little Susitna River coho salmon escapement, 1988-2015

Year	Sport	Sport	Weir	Escapement Goal		Goal	Exceeded	Amount
	Catch	Harvest*	Count	Lower	Upper	Met/Missed/	Amount	below goal
						Exceeded		
1988		28,647	21,437					
1989 ¹		24,726	15,855					
1990		9,739	15,511	7,500		Exceeded	8,011	
1991		24,149	39,241	7,500		Exceeded	31,741	
1992		23,439	21,182	7,500		Exceeded	13,682	
1993		35,313	34,822	7,500		Exceeded	27,322	
1994		23,830	28,948	7,500		Exceeded	21,448	
1995 ²		17,442	12,266	7,500		Exceeded	4,766	
1996 ³	22,996	20,171	15,803	7,500		Exceeded	8,303	
1997	11,560	7,756	9,894	7,500		Exceeded	2,394	
1998	18,621	14,469	15,159	7,500		Exceeded	7,659	
1999	11,990	8,864	3,017	9,600	19,200	Missed		6,583
2000	31,517	20,357	15,436	9,600	19,200	Met		
2001	24,636	17,071	30,587	9,600	19,200	Exceeded	11,387	
2002	30,582	19,278	47,938	10,100	17,700	Exceeded	30,238	
2003	21,649	13,672	10,877	10,100	17,700	Met		
2004	24,981	15,307	40,199	10,100	17,700	Met	22,499	
2005	13,447	10,203	16,839	10,100	17,700	Exceeded		
2006 ⁴	20,558	12,399	8,786	10,100	17,700	Met		
2007	14,895	11,089	17,573	10,100	17,700	Met		
2008	18,618	13,498	18,485	10,100	17,700	Exceeded	785	
2009	11,283	8,346	9,523	10,100	17,700	Missed		577
2010	12,811	10,662	9,214	10,100	17,700	Missed		886
2011	3,835	2,452	4,826	10,100	17,700	Missed		5,274
2012 ⁵	2,114	1,681	6,779	10,100	17,700	Missed		3,321
2013	6,670	5,229	13,583	10,100	17,700	Met		
2014	8,663	6,922	24,211	10,100	17,700	Exceeded	6,511	
2015			12,421	10,100	17,700	Met		
							196,746	16,641
* Sport "harvest" averages about 70% of sport "catch".								
¹ Exxon oil spill year, no drift gillnetting in Cook Inlet.								
² Hatchery stocking program ended (began in 1982)								
³ The weir was moved from river mile 32.5 to river mile 71								
⁴ Weir washed out, escapement goal is believed to have been met or exceeded								
⁵ The weir was moved back to river mile 32.5								

PROPOSED BY: United Cook Inlet Drift Association (HQ-F16-003)

PROPOSAL 95 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Restrict commercial drift gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1–15, as follows:

Amend the Central District Drift Gillnet Fishery Management Plan as follows:

(e) from August 1 -15, [THERE ARE NO MANDATORY AREA RESTRICTIONS TO REGULAR PERIODS,]

(1) fishing during both regular 12 hour periods per week will be restricted to one of more of the following sections: (A) Expanded Kenai Section; (B) Expanded Kasilof Section; (C) Anchor Point Section; (D) Drift Gillnet Area 1, except that if the Upper Subdistrict set gillnet fishery is closed under 5 AAC 21.310(b)(2)(C)(iiii), or the department determines that less than one percent of the season’s total drift gillnet sockeye salmon harvest has been taken per fishing period for two consecutive fishing periods in the drift gill net fishery, regular fishing periods will be restricted to Drift Gillnet Area [S 3 AND] 4. In this subsection, “fishing period” means a time period open to commercial fishing [as measured by a 24-hour calendar day from 12:01 a.m. to 11:59 p.m.] **of 12 hours during a calendar day.**

(2) additional fishing time under this subsection is allowed only in one or more of the following sections; (A) Expanded Kenai Section; (B) Expanded Kasilof Section; (C) Anchor Point.

What is the issue you would like the board to address and why? While changes to the drift management plan adopted by the board in 2014 have proven more effective in increasing escapements of Northern District drainage salmon stocks during July and providing more reasonable harvest opportunities for Northern District user groups during July, management during 2015 proved the plan inadequate in continuing those benefits throughout August. As currently configured the plan allows excessive amounts of drift gillnet fishing during the first half of August which jeopardizes both attainment of Northern District drainage salmon escapement needs and reasonable salmon harvest opportunities for Northern District and Northern District drainage user groups. Therefore, to address Northern conservation concerns and to allow more reasonable Northern harvest opportunity for other user groups, this proposal seeks to amend the drift management plan in a manner that still maintains drift gillnetters an extremely liberal opportunity to harvest surplus sockeye salmon during times of August abundance. Note: under this proposal even if the drift fishery was restricted under the 1 % rule, ADF&G could still allow the fleet to fish 7 days per week (5 days per week in the Expanded Kenai, Expanded Kasilof, and Anchor Point Sections and 2 days per week in Drift Gillet Area

4 during a portion of the season when sockeye salmon abundance is in decline). Considering restrictions on other user groups during the August 1-31 timeframe, this proposal, if adopted, should increase the likelihood of attaining minimum Northern District escapement needs, provide more reasonable harvest opportunity for Northern and other user groups, while retaining significant drift gillnet harvest opportunity during August.

PROPOSED BY: Alaska Sport Fishing Association (HQ-F16-001)

PROPOSAL 96 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Allow commercial fishing with drift gillnets in all waters of the Central District, except the Kenai and Kasilof Sections, from August 16 until closed by emergency order, as follows:

5 AAC 21.353 Central District Drift Gillnet Fishery Management Plan

(f) From August 16 until closed by emergency order, [DRIFT GILLNET AREAS 3 AND 4 ARE OPEN FOR FISHING DURING REGULAR FISHING PERIODS.], drift gillnetting will be open in all waters of the Central District, except in the Kenai and Kasilof sections, from 7:00 a.m. Monday until 7:00 p.m. Monday, and from 7:00 a.m. Thursday until 7:00 p.m. Thursday.

What is the issue you would like the board to address and why? The Upper Cook Inlet Salmon Management Plan (5 AAC 21.363 (a) (1)) states that the harvest of UCI salmon should be allowed in order to maximize the benefits of these resources. The current Central District drift gillnet management plan is too restrictive and does not allow ADF&G the tools it needs in order to harvest surplus Kenai and Kasilof river sockeye salmon stocks. An overly restrictive drift gillnet management plan can therefore result in over escapement of these stocks, which it has in two out of two years for both Kenai and Kasilof river sockeye salmon since the plan was modified in 2014. As ADF&G has shown in previous reports to the board, escapements above goals, and especially consecutive years of escapements above goals, results in an immediate yield loss to all harvesters in the year of the over-escapement, and it also poses unwarranted risks to these stocks through lower yields in the future.

In the current drift gillnet management plan, drifters are restricted to Drift Areas 3 & 4 on or before August 16. There is no significant reason to move the drift gillnet fleet out of the middle of the Central District after August 15. In previous reports to the board, ADF&G has shown that drifters are a very minor harvester of Kenai and Kasilof river coho salmon. That said, in order to provide additional protection to these stocks, this proposal seeks to allow drifting in the Central District, except for the Kenai and Kasilof Sections, for regular 12-hour fishing periods only after August 15. This would allow for additional harvest of Kenai and Kasilof sockeye salmon stocks while not posing threats to east-side coho salmon stocks or to northern bound coho salmon stocks, which are

largely done with their migration through the Central District by this time of year. It would provide those drifters who wish to fish later in the season with additional economic opportunities, and it could help ADF&G with the issue of continued over-escapement of sockeye salmon in both the Kenai and Kasilof rivers.

PROPOSED BY: David Hillstrand (EF-F16-041)

PROPOSAL 97 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan and 21.310. Fishing Seasons. Repeal the drift and set gillnet one-percent rules that apply to from August 1–15, as follows:

What is the issue you would like the board to address and why? 1 % Rule – drift and set net.

A large harvestable surplus is wasted, early closures and late returns equal wasted harvestable surplus.

Repeal the 1% Rule

PROPOSED BY: John McCombs (HQ-F16-088)

PROPOSAL 98 – 5 AAC 21.353. Central District Drift Gillnet Fishery Management Plan. Reduce sport fishery bag limit for coho salmon on the west side of Cook Inlet and close drift gillnet fishing in Areas 3 and 4 for remainder of season if coho salmon sport fishing is restricted or closed in the Little Susitna River, as follows:

5 AAC 21.353. CENTRAL DISTRICT DRIFT GILLNET FISHERY MANAGEMENT PLAN.

(a) The purpose of this management plan is to ensure adequate escapement of salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the commercial drift gillnet fishery to minimize the harvest of [**Northern District and Kenai River**] coho salmon in order to provide sport and guided sport fishermen a reasonable opportunity to harvest these salmon stocks over the entire run, as measured by the frequency of inriver restrictions. The department shall manage the Central District commercial drift gillnet fishery as follows:

- (1) weekly fishing periods are as described in 5 AAC 21.320(b);
- (2) the fishing season will open the third Monday in June or June 19, whichever is later,

and

(A) from July 9 through July 15,

(i) fishing during the first regular fishing period is restricted to the Expanded Kenai and Expanded Kasilof Sections; additional fishing time is allowed only in the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict;

(ii) fishing during the second regular fishing period is restricted to the Kenai and Kasilof Sections of the Upper Subdistrict and Drift Gillnet Area 1;

(iii) at run strengths greater than 2,300,000 sockeye salmon to the Kenai River, the commissioner may, by emergency order, open one additional 12-hour fishing period in the Kenai and Kasilof Sections of the Upper Subdistrict and Drift Gillnet Area 1;

(B) from July 16 through July 31,

(i) at run strengths of less than 2,300,000 sockeye salmon to the Kenai River, fishing during one regular 12-hour fishing period will be restricted to the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict;

(ii) at run strengths of 2,300,000 to 4,600,000 sockeye salmon to the Kenai River, fishing during one regular 12-hour fishing period per week will be restricted to either or both the Expanded Kenai and Expanded Kasilof Sections of the Upper Subdistrict or Drift Gillnet Area 1;

(iii) at run strengths greater than 4,600,000 sockeye salmon to the Kenai River, there will be no mandatory restrictions during regular fishing periods;

(C) from August 16 until closed by emergency order, Drift Gillnet Areas 3 and 4 are open for fishing during regular fishing periods;

(D) from August 11 through August 15, there are no mandatory area restrictions to regular periods, except that if the Upper Subdistrict set gillnet fishery is closed under 5 AAC

(E) if coho salmon sport fishing is restricted or closed in the Little Susutna River

(i) All coho fisheries on the west side of Cook Inlet shall have a reduced bag limit from three coho to two coho.

(ii) All drift gillnet fishing in Areas 3 and 4 shall close for remainder of the season. 21.310(b)(2)(C)(iii), regular fishing periods will be restricted to Drift Gillnet Areas 3 and 4.

(b) For the purposes of this section,

(1) "Drift Gillnet Area 1" means those waters of the Central District south of Kalgin Island at 60° 20.43' N. lat.;

(2) "Drift Gillnet Area 2" means those waters of the Central District enclosed by a line from 60° 20.43' N. lat., 151° 54.83' W. long. to a point at 60° 41.08' N. lat., 151° 39.00' W. long. to a point at 60° 41.08' N. lat., 151° 24.00' W. long. to a point at 60° 27.10' N. lat., 151° 25.70' W. long. to a point at 60° 20.43' N. lat., 151° 28.55' W. long.;

(3) "Drift Gillnet Area 3" means those waters of the Central District within one mile COOK INLET AREA 103 of mean lower low water (zero tide) south of a point on the West Foreland at 60° 42.70' N. lat., 151° 42.30' W. long. ;

(4) "Drift Gillnet Area 4" means those waters of the Central District enclosed by a line from 60° 04.70' N. lat., 152° 34.74' W. long. to the Kalgin Buoy at 60° 04.70' N. lat., 152° 09.90' W. long. to a point at 59° 46.15' N. lat., 152° 18.62' W. long. to a point on the western shore at 59° 46.15' N. lat., 153° 00.20' W. long., not including the waters of the Chinitna Bay Subdistrict.

(c) 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? Coho salmon stocks on the west side of Cook Inlet (Area's 3 and 4) are being over exploited by commercial drift gillnets after August 11. Management of coho salmon on the west side of Cook Inlet should be managed for a sportfish priority as is the Northern District and Kenai River.

The Alaska Department of Fish and Game has failed to identify an adequate coho escapement goal for any west side Cook Inlet streams. Sportfish participation has increased dramatically in the last decade and these systems cannot continue to support commercial harvest without threatening sustainability

PROPOSED BY: Mark Glassmaker

(EF-F16-038)
