PROPOSAL 210

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

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

- (b) the department shall manage the Northern District commercial salmon fisheries based on the abundance of sockeye salmon counted through the weir on Larson, Chelatna, and Judd Lakes, and based on the abundance of king, sockeye, and coho salmon counted through Little Susitna River weir or other salmon abundance indices as the department deems appropriate.
- (1) commercial fishing within one stature mile of the Little Susitna River channel and terminus with saltwater as measured at mean lower low water may only be allowed by inseason emergency order as follows:
- (A) through July 13, when the department projects the king salmon escapement to exceed the Little Susitna River king salmon SEG, and only if more than 1,000 sockeye salmon have also migrated through Little Susitna River weir.
- (B) after July 14 when the department projects the coho salmon escapement through Little Susitna River weir to exceed the Little Susitna River coho salmon SEG, and only if more than 3,000 sockeye salmon have also migrated through Little Susitna River weir.

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

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

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

All or most fishers may prefer to fish in the best harvest locations — but because of conservation needs — and in order to provide legitimate harvest opportunities for other users — the best harvest locations or someone's favorite fishing spot, overtime may become closed to fishing. This can be seen in the Little Susitna River sport fishery after installation of the Alaska Department of Fish and Game (ADF&G) salmon counting weir. Standard closure area as listed in regulation below a weir is 300 feet — overtime waters closed to sport fishing below Little Susitna River weir have expanded to approximately 1,500 feet — 5 AAC 60.122 (9) (M). This section of water was a favorite fishing location for some anglers. Did its closure cause those people to cease fishing Little Susitna River? Perhaps, but not necessarily. Just as would be the case in the commercial fishery, while maybe not as productive for catching salmon, many additional miles of water remain open to fishing and harvest.

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

PROPOSED BY: Andrew Couch	(EF-F23-054)
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