

5 AAC 21.358. 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 for commercial and inriver uses to provide an opportunity to harvest 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 and other inriver users 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.

Both the Northern District King salmon Management Plan and the Northern District Salmon Management Plan speak to the opportunity to harvest king and coho salmon, respectively. I believe that inriver users are not being provided with the opportunity to harvest these salmon stocks based on their abundance. The inriver users do not have the opportunity to harvest these salmon based upon their abundance. This has resulted in an unauthorized allocation from the inriver users, primarily the sport fishery, to the commercial fishery. I respectfully request the Board to fix this plan so that all users benefit. The following graphs and table depict this reallocation and the decline in Coho salmon escapements to the Densha and Little Susitna rivers.

There needs to be a hard cap on the Northern District commercial harvest of Coho salmon. I proposed using a percentage of the Total Allowable Catch (TAC), which will result in a hard but variable cap dependent on the TAC. However, I understand that the Department says that they cannot manage using a TAC. However, using a percent allocation of the TAC for the commercial and sport fisheries would translate into variable numbers of fish dependent on the size of the run and the associated percent of the TAC in both high and low run events. I believe that this could be accomplished using an estimate of the TAC derived from the preseason forecast and then adjusting the TAC and the commercial fishery, inseason, based on inseason information. A hard cap in numbers of salmon must be set at a higher level to adequately address good runs. However, the Chinook and Coho salmon runs are presently low, and I am fearful that the cap will be set too high and looked upon as a target.

The commercial fishery manager is tasked with not only providing for the escapement but also the allocation of salmon to the inriver users. This has not and is not happening because of the pair restrictions. The commercial fishery manager must wait until the sport fishery manager restricts the sport fishery to trigger the response in the commercial fishery. In most every case this restriction in the sport fishery may aid in the achieving the low end of the SEG but takes away harvest opportunity for inriver users. In addition to this plan resulting in the unauthorized increase in the allocation of salmon to the commercial fishery, this also negatively impacts the escapement in low runs or runs that were overforecasted. At the least, the commercial fishery manager must pass enough fish to provide for the inriver users and the escapement.

- Alternative 1. Suspend the commercial fishery until there is enough information to fish, instead of fishing and then finding out that the run did not develop as anticipated.
- Another alternative would be to restrict the fishery to one net so that commercial harvest may be slowed down and spread out over the entire run. This may also result in reduced commercial fishery harvest.
- Allow the department the tool to allow, at their discretion, to set the number of nets fishermen could use in the commercial fishery.

I sincerely hope that this information is helpful in your deliberations.

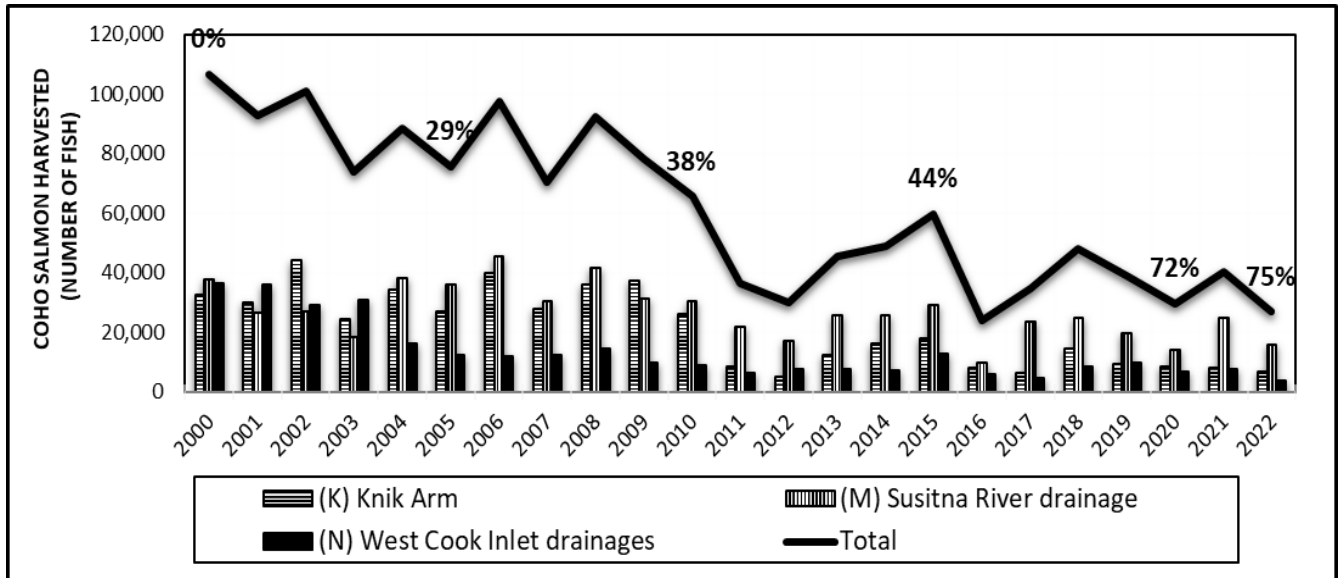


Figure 1. Sport harvest in the Northern Cook Inlet Management Area. Line above bars indicates the percent decline in the harvest from 2000. The percentage above the line are point estimates of the decline in the harvest from 2000.

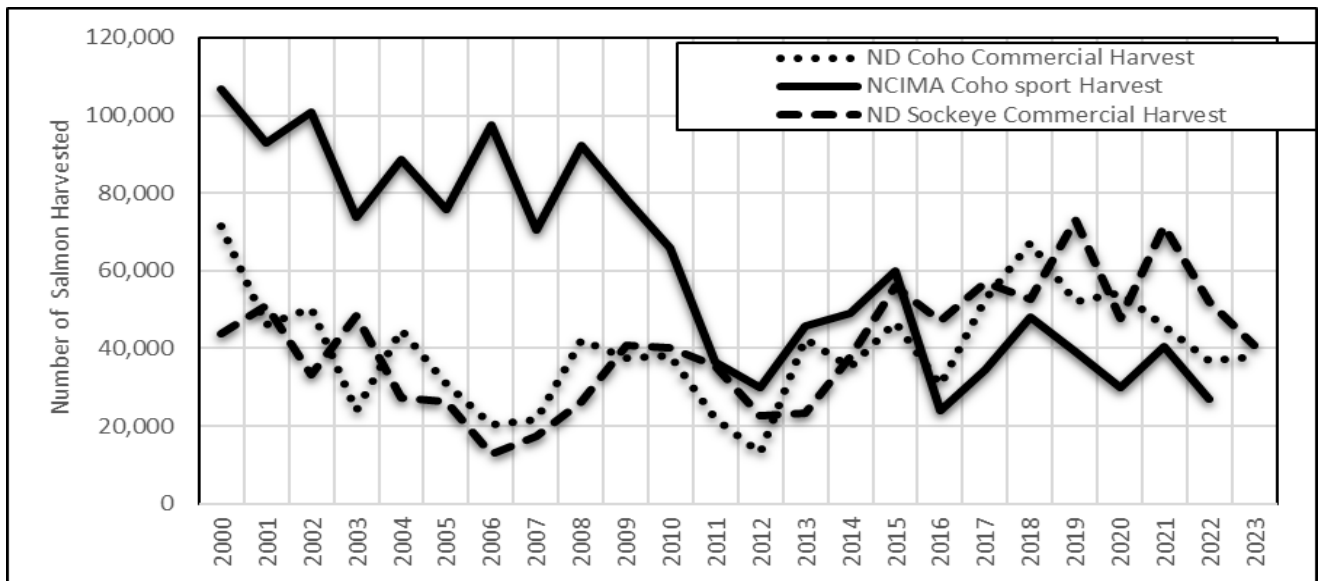


Figure 2. Comparison between the Northern District Commercial Coho Salmon and the Northern Cook Inlet sport Coho salmon sport harvest and the Northern District commercial Sockeye salmon harvest.

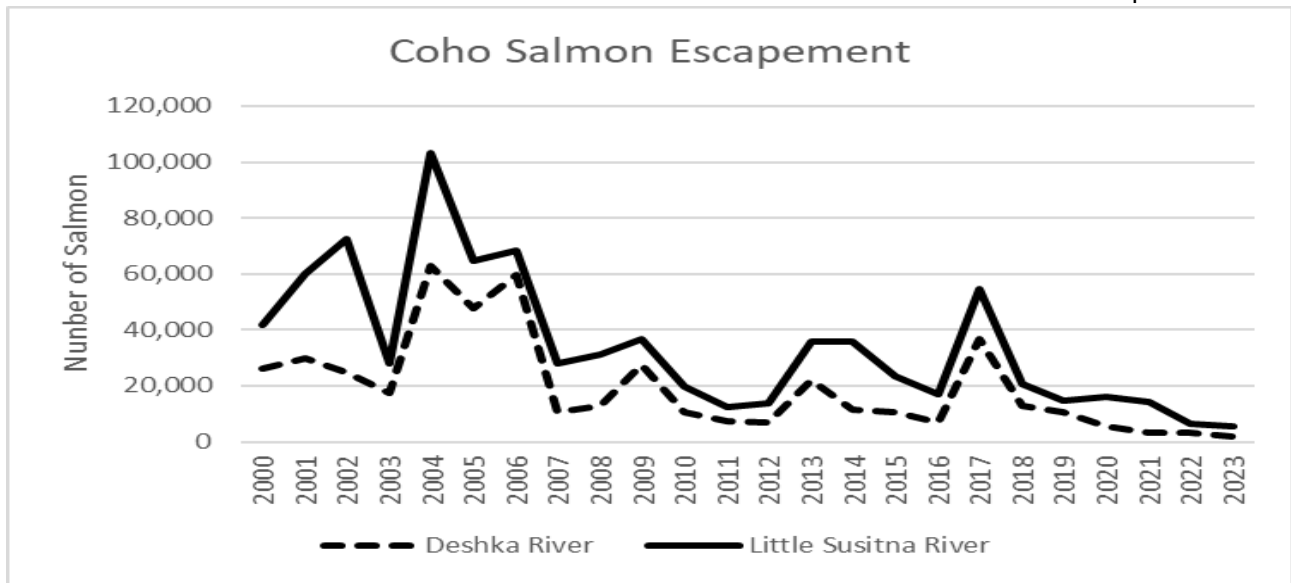


Figure 3. Coho salmon escapement to the Deshka and Little Susitna rivers, 2000-2023. The Deshka River weir counts were incomplete for 2020-2023. The Little Susitna River weir counts were incomplete for 2022 and 2023. See Table 1 for further information.

Table 1. Coho salmon harvest and escapement for the Northern District and the Northern Cook Inlet Management Area, 2000-2023

Year	Coho Salmon Harvest							
	Northern District Commercial Harvest		Northern Cook Inlet Sport Harvest		Total Harvest	Deshka River Escapement	Little Susitna Escapement	
	number	prop.	number	prop.	number	number	number	
2000	71,475	0.40	106,737	0.60	178,212	26,297	15,436	
2001	45,928	0.33	92,960	0.67	138,888	29,915	30,383	
2002	50,292	0.33	100,947	0.67	151,239	24,612	47,938	
2003	24,015	0.25	73,928	0.75	97,943	17,305	10,877	
2004	44,819	0.34	88,746	0.66	133,565	62,940	40,199	
2005	30,859	0.29	75,795	0.71	106,654	47,887	16,839	
2006	20,368	0.17	97,631	0.83	117,999	59,419	8,786	
2007	21,531	0.23	70,574	0.77	92,105	10,575	17,573	
2008	42,177	0.31	92,377	0.69	134,554	12,724	18,485	
2009	37,629	0.32	78,374	0.68	116,003	27,348	9,523	
2010	38,111	0.37	65,726	0.63	103,837	10,390	9,182	
2011	22,113	0.38	36,582	0.62	58,695	7,508	4,826	
2012	13,206	0.31	29,890	0.69	43,096	6,825	6,770	
2013	42,413	0.48	45,627	0.52	88,040	22,141	13,583	
2014	35,200	0.42	49,154	0.58	84,354	11,578	24,211	
2015	46,616	0.44	59,883	0.56	106,499	10,775	12,421	
2016	30,476	0.56	23,898	0.44	54,374	6,816	9,998	
2017	52,701	0.60	34,657	0.40	87,358	36,869	17,781	
2018	67,098	0.58	47,918	0.42	115,016	12,933	7,583	
2019	51,935	0.57	39,051	0.43	90,986	10,445	4,226	
2020	54,453	0.65	29,784	0.35	84,237	5,368	^a 10,765	
2021	45,825	0.53	40,280	0.47	86,105	3,338	^b 10,923	
2022	36,895	0.58	26,863	0.42	63,758	3,168	^c 3,162	
2023	37,924	na	na	na	na	1,817	^d 3,726	
Averages								
Years	number	prop	number	prop	number	number	number	
2018-22	45,406	0.58	33,995	0.42	81,272	4,827	6,560	
2013-17	46,418	0.52	43,102	0.48	89,520	15,794	14,399	
2008-12	30,694	0.37	51,240	0.63	81,934	14,842	8,777	
2004-07	31,951	0.27	85,025	0.73	116,975	38,709	20,376	
2000-03	47,928	0.33	93,643	0.67	141,571	24,532	26,159	
^a	Incomplete weir counts. Weir pulled on August 13							
^b	Incomplete weir counts. Weir pulled on August 12							
^c	Incomplete weir counts. Weir pulled on August 8							
^d	Incomplete weir counts. Weir pulled on August 30							
^e	Incomplete weir counts. Weir pulled on August 10							
^f	Incomplete weir counts. Weir pulled on August 26							