

Substitute Language for Proposal 214

(c) From **June 25** [July 20] through **September 30** [August 6] if the department's assessment of abundance indicates that restrictions are necessary to achieve **mid-point level(s) of established Northern District sockeye and coho salmon escapement goal(s)**, 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 in **portions or** all of the Northern District is limited to the following options selected at the discretion of the commissioner:

- 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 aggregate length;
- (4) Zero set gillnets – closure of specific area(s).**

Rationale: The following statement was included in Department Comments for Proposal 214:

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. The department **OPPOSES** management strategy that unnecessarily restricts fisheries without a conservation need and measurable benefit. The department does not currently have authority to decrease the amount of gear fished during an opener. *Granting the department an allowance for fishing less than a full complement of gear would be a good addition to the department's management toolbox to address weak stock management concerns.* (italics and underline of last sentence added)

My Comment: Escapement goals are set in a range so the department can shoot for the mid-point of a specific goal and hopefully achieve the goal range. Emergency restrictions and in the 2023 season closure to commercial fisheries (central district drift and northern district set net) for Susitna River sockeye salmon, Little Susitna River coho salmon, Deshka River and Susitna River coho salmon) and emergency restrictions (and 2023 season closure for coho) to sport fisheries (Larson Creek sockeye salmon, Little Susitna River coho salmon, Deshka River coho salmon, Susitna River drainage coho salmon and Jim Creek salmon) within the last 4 years all demonstrate the need for these management tools.

Allowing the department the flexibility to make number of nets adjustments to the Northern District set net fishery when projected or inseason escapement levels are falling below the mid-point level of established sockeye salmon and coho salmon goal(s) would better ensure attainment of the goals, provide more reasonable harvest opportunities for inriver users, and likely lessen the severity of additional restrictions and/or closures exacerbated by the current practice of waiting to make inseason restrictions to the set net fishery (during most of the season) only after projected escapement goal shortages have been documented by far upstream weirs. I concur with the department's assessment that emergency authority to adjust the number of gill nets in the Northern District commercial season would be a useful tool for better attaining established escapement goals.