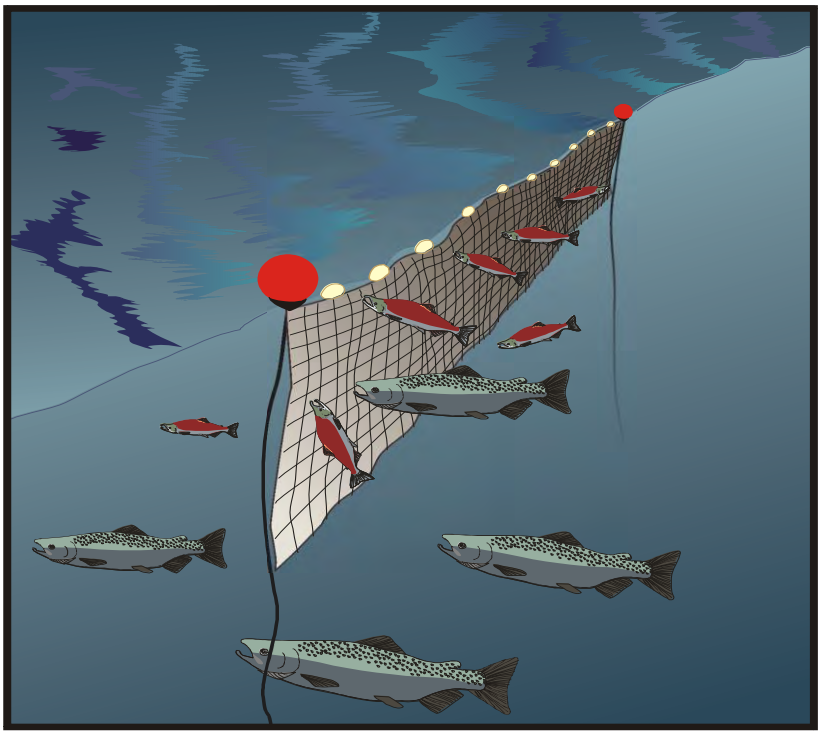
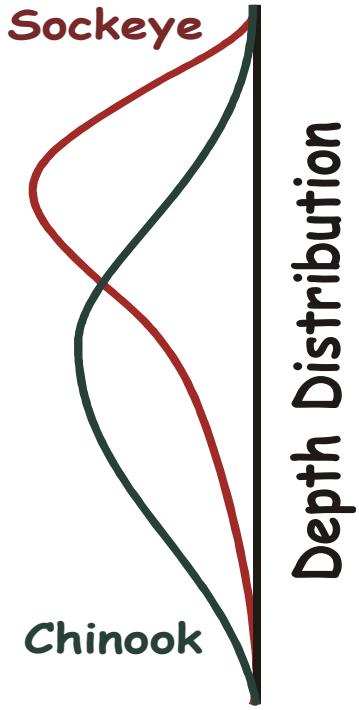
Issue

- Research conducted in UCI by Bethe and Hansen (1998) and Welch et al. (2014) indicated that shallower nets can increase fishery selectivity for sockeye relative to kings.
- Study methodologies do not provide sufficient information to effectively quantify benefits of shallower nets in terms of king savings.
- However, the facts that kings tend to run deeper than sockeye and shallower nets have the potential to reduce king catches relative to sockeye are beyond dispute.
- Despite the potential benefits of shallower nets, ADF&G has not implemented meaningful tests of this alternative gear.





KRSA Proposal (#141) - Limit set gillnet mesh depth

No more than 29 meshes in the Upper Subdistrict of the Central District.

IV. KENAI RIVER LATE-RUN KING SALMON MANAGEMENT PLAN

Plan revisions are needed to address ADF&G's transition to a large fish goal

Background

- ADF&G has recommended revision of the current SEG based on all king sizes with a goal based only on large fish 75 cm MEF (mid-eye to tail fork length) (Table 3).
- This includes kings approximately 33.3 inches in total length and greater. On average, large fish comprise approximately 90% of the total run and include practically all of the females.
- This change is due to difficulties in estimating numbers of small kings (<75 cm MEF) with sonar and inriver netting programs.

Table 3. Summary of previous (2016) and revised (2017) sustainable escapement goals (SEG) for Kenai River late-run king salmon (Fleischman & Reimer 2017).

	Sizes	SEG	In-plan Triggers	
Previous (2016)	All	15,000 – 30,000	16,500 [b]	22,500 [c]
ADF&G 2017 Revision	≥75 cm MEF[a]	13,500 – 27,000	(14,850 [d])	(20,250 [d])

[a] *Mid-eye to tail fork measurement.*

[b] *1,500 fish higher than the OEG, accounting for uncertainty in ability to project run size.*

[c] *Mid-point between upper and lower bounds of the SEG.*

[d] *Equivalent values in large fish units based on 90% of all-size values (estimates by KRSA).*

Issue #1 – Trigger Point Revisions

Reference values for implementation of paired restrictions need to be revised for consistency with the large fish goal. Paired restrictions share the conservation burden for Kenai king salmon among sport, commercial and personal use fisheries during periods of low king abundance. Without paired restrictions, both the sport and commercial fishery are powerful enough to jeopardize escapement at low levels of abundance and to force each other into closure. Paired restrictions were adopted in a serious effort to prevent the disastrous fishery closures experienced in the past and have proven successful in that regard.

KRSA Recommendations

1. We support transition to a large-fish goal to ensure adequate spawning escapements and reduce assessment uncertainty.
2. Management triggers in the Kenai late-run king salmon plan should be revised with equivalent large fish values identified in Table 3.
3. Paired restrictions during times of low king abundance are essential for continuing to preserve the delicate balance of benefit and burden of conservation between commercial, sport and personal use fisheries.

Issue #2 – Management Priorities During Strong King Runs

Management substantially reduces sport fishery opportunity and values when commercial fishery tools are used to reduce inriver runs of Kenai kings at higher run sizes. Such management is inconsistent with the sport fishery priority for this species.

Higher inriver runs produce tremendous sport fishery benefits with no significant impact on future production for total escapements up to 40,000 (36,000 fish ≥75 cm MEF). Returns from all historical escapements below 36,000 fish ≥75 cm MEF exceeded replacement and produced substantial yields on average according the Department's recent escapement goal analysis (Fleischman & Reimer 2017). There was no significant correlation of returns to total escapements between 22,500 and 40,000 (20,250 to 36,000 fish ≥75 cm MEF).

The top end of the SEG for Kenai late-run king salmon is less than the historical average escapement. A higher upper goal is needed to avoid managing for escapements less than the historical average escapement. This is true for both all-size and big fish goals.

When escapements are projected to exceed the upper end of the SEG but still fall within the range of historical average, no management action in addition to the normal fishing regulatory regime should be taken to further reduce the escapement.

KRSA Proposal (#162) - Kenai late-run King Optimum Escapement Goal

Establish an Optimum Escapement Goal (OEG) as follows:

	Sizes	SEG	OEG
Previous (2016)	All	15,000 – 30,000	15,000 – **40,000**
ADF&G 2017 Revision	≥75 cm MEF	13,500 – 27,000	13,500 – **36,000**

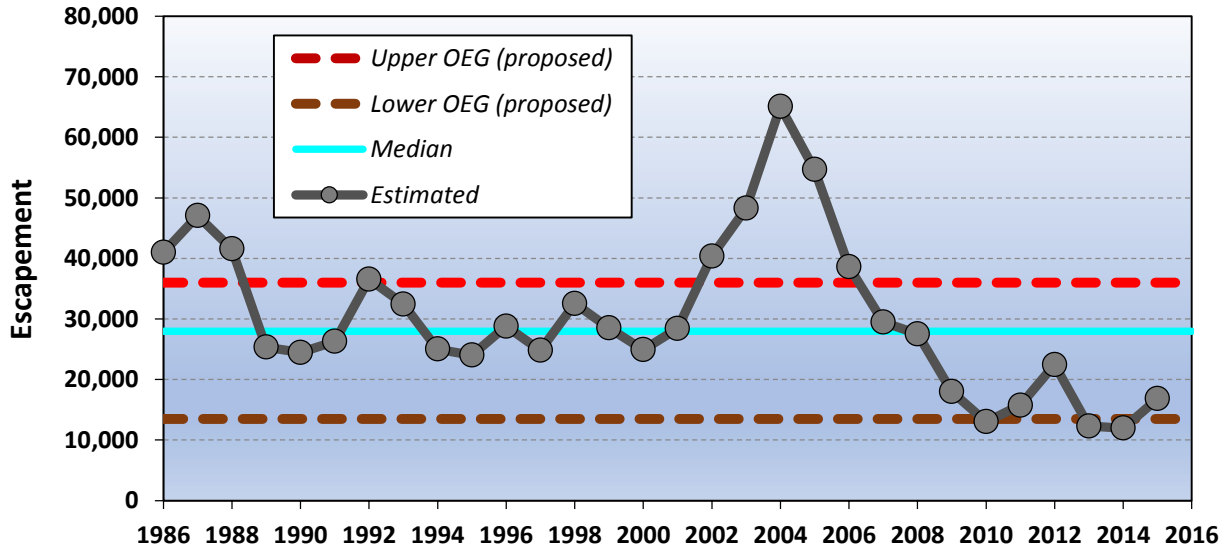


Figure 6. Historical escapements of large (≥75 cm MEF) late-run Kenai king salmon relative to the OEG proposed by KRSA.

V. KASILOF RIVER SALMON MANAGEMENT PLAN

Current plans do not provide adequate protection for Kenai or Kasilof late-run kings during years of large Kasilof sockeye returns

Background

- From the beginning of the fishing season through July 7, the set net fishery in the Kasilof section is regulated by the Kasilof River Salmon Management Plan.
- After July 7, the Kasilof section is governed by the Kenai River Late-Run Sockeye Salmon Management Plan.
- Windows are periodic, regular closures in commercial fisheries designed to pass fish for escapement and harvest by inriver fisheries.
- Under most conditions, the Kenai sockeye plan provides for two commercial closure windows. However, the Kasilof sockeye plan provides only one commercial closure window.
- No windows are specified in current plans for the Kasilof River Special Harvest Area (KRSHA) which is being fished intensively in recent years.

Issue

Current management fails to provide adequate protection for Kasilof late-run kings. Genetics data shows that the Kasilof supports a substantial run of late-run kings and a significant portion of the set net harvest. There is currently no basis for in-season management of Kasilof king salmon. Run strength is not assessed nor have escapement goals been identified.

Kenai kings are also subject to substantial harvest in the Kasilof section set gillnet fishery. New telemetry data shows that most Kenai kings are passing directly through the Kasilof section as they move and mill northward along the coast (Welch et al. 2014).

Intensive fishing in the KRSHA at the river mouth substantially impacts escapement of Kasilof kings and counteracts benefits of district-wide limitations on set net fishing time.

KRSA Proposal (#103) - Expand use of Kasilof windows

Provide adequate protection of Kasilof king escapement by increased use of no-fishing windows in the Kasilof area set gillnet fishery.

1. Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 (in addition to the current 36-hour window at the end of the week).
2. Adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7, the same as those found in the Kenai River late-run sockeye management plan.

Explanation

Windows pose no significant risk to Kasilof sockeye production. Robust sockeye returns continue despite escapements that regularly exceed established escapement goals. No escapement since 1985 has failed to replace itself. In fact, the recent record escapement of 522,000 in 2004 produced a 1.5 million sockeye return (4th largest in 40 years).

The Kasilof River Special Harvest Area (KRSHA) at river mouth was intended to target Kasilof sockeye as a last resort when escapements are large. This area was rarely used before 2005. Subsequent use proved unpopular with both commercial and inriver users and led the BOF to direct to that other measures be used in priority to the special harvest area. Unfortunately, the KRSHA has been heavily fished in recent years with continuing strong Kasilof sockeye runs.

The KRSHA harvests significant numbers of king salmon. King catches in the Kasilof sport fishery drop way off during periods of intensive fishing in the special harvest area. Escapements must be declining accordingly. Extensive use of the special harvest area must be limited in order to protect escapement of Kasilof late-run king salmon. ADF&G does not enumerate Kasilof king salmon. Hence, per the Statewide Sustainable Salmon Policy, conservative, precautionary management is warranted.

Myth: Windows don't work because of unpredictable sockeye movement patterns.

Fact: Windows deliver significant numbers of sockeye and kings to rivers during periods when salmon are moving through the inlet.

Windows are working as intended in UCI. They interrupt sustained periods of set net fishing along the east-side beaches to reduce unpredictable boom or bust patterns in inriver returns that severely impact personal use and sport fisheries.

While windows cannot guarantee delivery of fish to the rivers when fish aren't moving, this in no way counters their value. However, the lack of fishery windows can practically eliminate periodic large influxes of salmon into the rivers as the historical management practice often involved extended periods of intensive commercial fisheries across the peak of the sockeye run. Intensive commercial fisheries have the effect of keeping the inriver fisheries off balance and severely limiting opportunities to access a reasonable share of the common property sockeye salmon resource.

Windows also provide significant biological benefits by protecting escapement of stocks that are not monitored in-season (i.e. Kasilof late-run kings) and protecting the inherent genetic and life history diversity of stocks across the duration of the run.

Initial concern that windows would either unnecessarily constrain management flexibility to attain escapement goals or increase the chances of missing unpredictable large pulses of fish onto the beach, into the river, and over the escapement goal, have not been realized.

VI. CENTRAL DISTRICT DRIFT GILLNET FISHERY MANAGEMENT PLAN

The data show clear benefits of the conservation corridor for northern-bound salmon with minimal impact on commercial fishery value

Background

- The "conservation corridor" regulation provides strategic time and area closures in the center of Cook Inlet and expands use of terminal fishing areas based on abundance of the Kenai and Kasilof sockeye.
- These regulations are designed to pass additional sockeye and coho through marine waters of the Central District, into northern rivers and streams to provide adequate escapements and produce a successful sport fishery for coho in most years.
- This regulation was adopted by the 2011 Board and revised in 2014 by unanimous 7-0 vote. Six years of data are now available on corridor effectiveness (MSBFWC 2017; Willette & Dupuis 2017).

Issue

The Drift Gillnet Fishery is the most powerful and mobile of all commercial fisheries in the UCI. Within the Drift Gillnet Fishery Management Plan, a conservation corridor is established through the use of strategic time and area closures. The expressed purpose of this is to facilitate passage of a variable proportion of sockeye and coho salmon bound north, through the marine waters of the Central District to the Northern District of UCI to regularly achieve escapement and fishery performance objectives.

The drift gillnet fishery of the central district is the most powerful and mobile of all commercial fisheries in UCI. The drift gillnet fleet is the primary harvester of north-bound salmon. Commercial interception of northern inlet sockeye and coho dwarfs harvest of these stocks in upstream sport fisheries. Susitna sockeye Salmon are currently designated as a stock of yield concern. Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.

KRSA Recommendations

KRSA strongly supports continued use of the expanded corridor as a tool to focus commercial harvest of Kenai and Kasilof sockeye within a more terminal area.

The Conservation corridor is based upon the best available biological information. While it is not expected that results will be similar from year to year, observations over the years of record provide significant support of the success of the conservation corridor in achieving its stated objectives (MSBFWC 2017; Willette & Dupuis 2017).

VII. UPPER COOK INLET MANAGEMENT PLAN

A small revision to this plan is necessary to protect ADF&G from having to make in-season out-of-plan allocation decisions that are the purview of the Board

Background

- The Upper Cook Inlet Management Plan [5 AAC 21.363}, commonly known as the "Umbrella Plan," provides general management considerations for all UCI salmon plans.
- Specific management actions are identified in a complex of detailed management plans and elements of one plan, on occasion, conflict with elements found in another.
- During its 2008 meeting, specific regulatory language was adopted in the Umbrella Plan to provide guidance when objectives or prescriptive tools of one management plan conflict with or compromise the department's ability to direction of another plan.
- The revision recognized the commissioner's emergency order authority to meet established escapement objectives as the primary management objective.
- This allows ADF&G to go outside other management plans and effectively prioritizes escapement goals (including inriver goals) over other provisions such as windows, allocations, or time and area restrictions.

Issue

The escapement goal priority protects long-term sustainability and yield of salmon. However, including inriver goals elevates commercial management for sockeye MSY over other escapement and allocation objectives developed to optimize sustained yields of mixed species and stocks. Out-of-plan actions triggered by inriver goals, conflict with management intent for other stocks including Kenai kings and Susitna sockeye. This occurs even when Kenai sockeye escapements are still comfortably within the OEG.

Inriver goals are allocative targets designed to distribute harvest among commercial and inriver fisheries. Out-of-plan actions inevitably impact the allocation balance among commercial drift, commercial set gillnet, personal use, and sport fisheries. This places the Department in the no-win situation of having to decide between one set of allocative targets and similarly allocative out-of-plan actions. Allocation decisions are the responsibility of the Board, not the Department.

KRSA Proposal (#127) – Priority of Kenai late-run sockeye inriver goals*

Drop "inriver goal" from the list of escapement goals in 21.363(e)

Inriver goals are allocative in nature and the department should not be put in a position of favoring one allocation strategy over another without consultation with the Board. The Kenai River is the only location in the state where inriver goals exist in regulation.

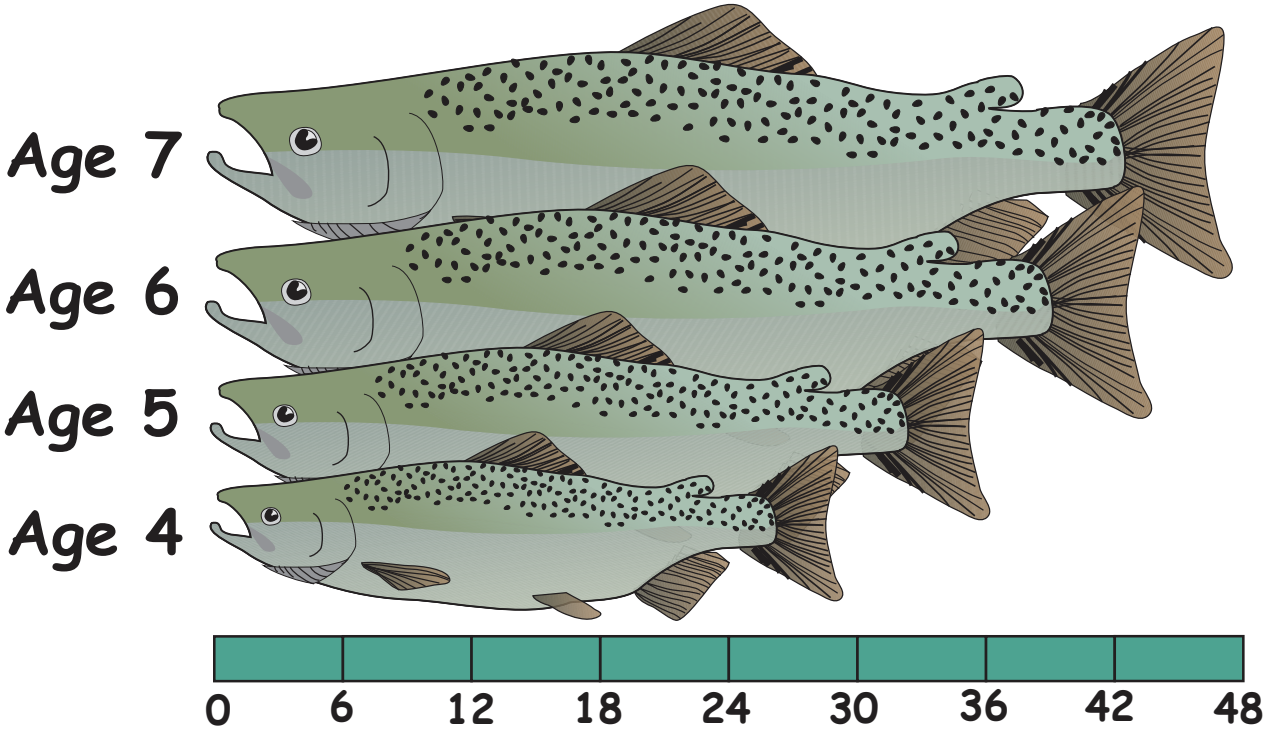
** Proposal 127 also addresses realignment of inriver and escapement goals which is the subject of ADF&G's proposal #116 (See Section II).*

VIII. KENAI EARLY-RUN KING SALMON MANAGEMENT PLAN

This management plan as written is inconsistent with its stated objectives

Background

- ADF&G has recommended revision of the current SEG based on all king sizes with a goal based only on large fish 75 cm MEF (mid-eye to tail fork length).
- The plan currently identifies an OEG that was created and adopted by the BOF to provide additional protection to early-run fish and to manage for an escapement objective based on maximum sustained production, a goal more complementary to sport fisheries.
- Section (b) of the plan directs that the fishery be managed "to ensure the age and size composition of the harvest closely approximates the age and size composition of the run.
- This management plan includes a unique size slot limit which restricts harvest to fish less than 42 inches, total length. This regulation was originally adopted in response to a long-term decline in the relative abundance of large fish and concern for sport fishery selectivity for large fish.
- The Kenai early run king sport fishery has been closed or severely restricted over the last few years during a period of unfavorable environmental conditions for Chinook stocks across the North Pacific from Yakutat to Kamchatka.



Issue #1 – Escapement Goal Revisions

The OEG in the current management plan needs to be revised for consistency with the currency of the new SEG based on large fish. A consistent OEG based on the large fish standard will ensure that management remains precautionary during periods of low abundance.

KRSA Recommendations

1. We support transition to a large-fish goal to ensure adequate spawning escapements and reduce assessment uncertainty.
2. This stock should continue to be managed for a precautionary OEG consistent with historical practice and substantial uncertainty in historical assessment data.
3. We propose a new OEG of 3,700 to 7,000 fish ≥75 cm MEF (as described below).

Explanation

The lower end of KRSA's recommended OEG is equivalent in large fish units to the current OEG. The upper end is higher than the large fish translation of the current goal. This increase provides a wider management target consistent with current limitations in run size forecasting and projection for this stock. This range also maximizes recruitment as per Fleischman & Reimer (2017). The prosed upper end is equivalent to the 80th percentile of historical escapements.

Table 4. Summary of previous (2016) and revised (2017) sustainable escapement goal (SEG) for Kenai River early-run king salmon (Fleischman & Reimer 2017).

	Sizes	SEG	OEG
Previous (2016)	All	3,800 – 8,500	5,300 – 9,000
ADF&G 2017 Revision	≥75 cm MEF [a]	2,800 – 5,600	(3,700 – 6,300 [b])
KRSA Recommendation	≥75 cm MEF [a]	"	3,700 – 7,000 [c]

[a] *Mid-eye to tail fork measurement.*

[b] *Equivalent to previous OEG in large fish units based on 70% of all-size values (KRSA estimate).*

[c] *Higher upper limit provides broader goal range, where additional fish has been shown to not adversely impact future yield.*

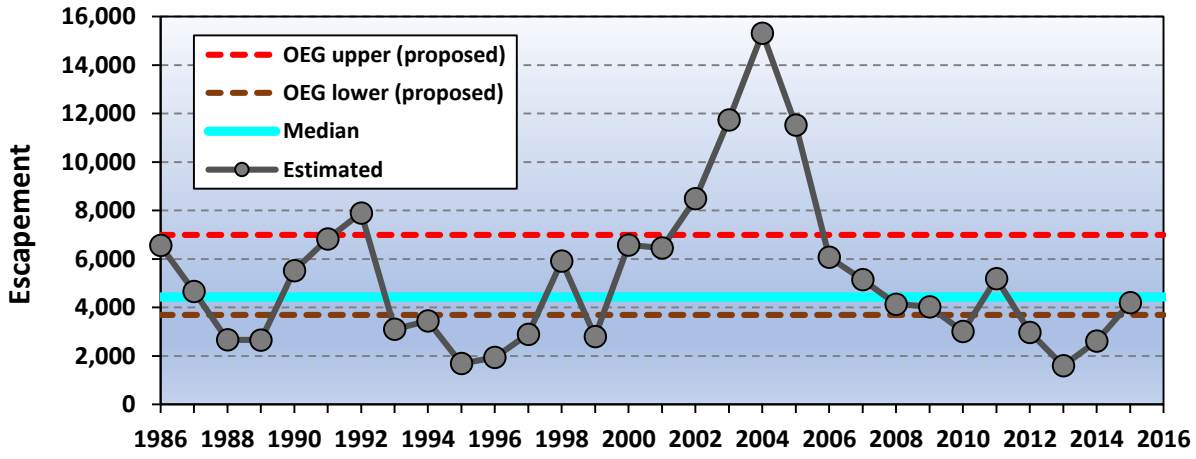


Figure 7. Historical escapements of large (≥75 cm MEF) early-run Kenai king salmon relative to the OEG proposed by KRSA.

Issue #2 – Inconsistencies in the Current Plan

Management plan provisions are contrary to plan goals and have produced undesirable unintended consequences.

- The size slot limit is directly contrary to explicit direction in the plan to manage harvest to closely approximate the size and age composition of the run.
- The size slot has failed to eliminate fishery selectivity. Harvest has simply been reconcentrated on the largest fish allowed under the slot. Smaller fish continue to be substantially under-harvested relative to abundance.
- The slot limit has failed to increase relative abundance of large fish. Subsequent analysis by ADF&G has identified declines in average age and size in king stocks across Alaska (Lewis et al. 2015). This implicates ocean conditions rather than fishing as the cause.
- The protected size slot results in escapements that frequently exceed the optimal escapement goal at large run sizes.
- The proposed large fish escapement goal provides explicit protection for large fish which was the original purpose of the slot limit.

KRSA Proposal (#149) – Revamp Kenai early-run King Management Plan

Revise the management plan [5 AAC 57.160] to achieve to following goals.

1. Manage for escapements comparable to the historical average and range.
2. Manage conservatively at low run sizes to optimize future returns.
3. Provide fishery opportunity based on abundance.

Establish a “step-up” regulatory strategy that replaces the slot limit with an effective but precautionary alternative:

A. Limit harvest to fish under 30 inches at run sizes which produce escapements within the OEG in order to optimize fishery opportunity while also providing some harvest opportunity on small fish sizes that have been historically underexploited.

B. Liberalize fishing opportunity at run sizes which produce escapements exceeding the OEG while also encouraging increased harvest of small fish sizes to balance potential angler preferences for larger fish.

C. Repeal the “over 55 inches” provision and the sealing requirements that help implement this provision.

Myth: ***Inriver habitat issues warrant significant reduction in or reconfiguration of Kenai sport fisheries.***

Fact: ***Freshwater productivity of Kenai kings is robust and virtually unaffected by inriver activities.***

Critics of development and sport, guided sport and personal use fisheries often argue that inriver allocations must be reduced in order to avoid significant habitat or biological damage that results from sport and personal use fishery activities and related development. While we might identify mechanisms by which various concerns have the potential to impact fish, all available evidence indicates that net effects on Kenai salmon abundance and productivity of all current inriver concerns are so marginal as to not be measurable. Normal variation in salmon abundance and productivity is repeatedly misrepresented as a human effect.

Human activities inevitably create environmental concerns in areas where people concentrate. Concerns in the Kenai have included shoreline and watershed development, stream bank erosion, elevated turbidity from boat wakes, hydrocarbon pollution from boat motors, and urban runoff are all issues of concern in the Kenai. Biological effects of sport fishery selection for different sizes, sexes or subpopulations of Chinook have also been questioned.

We can all agree that wise stewardship of our tremendous salmon resources and habitat is an essential Alaskan value. It is also true that where risks are uncertain, precautionary actions are appropriate. Thus, each of these inriver concerns warrant fair consideration and appropriate remediation.

Thus, boat motor restrictions adopted by the Board have been instrumental in reducing hydrocarbon pollution in the Kenai. Many miles of spawning and riparian area have been closed to angling to protect stream banks and bank vegetation. Extensive infrastructure has been put in place to provide fish-friendly access to anglers on the Kenai River. Millions of dollars have been invested protection and restoration of riparian habitat along the Kenai River, both on private and public lands.

The Kenai is Alaska's ground zero for salmon allocation disputes between competing commercial and sport/personal use fisheries. Issues are further complicated by different perspectives among residents and non-residents, guided and unguided sectors, and set gillnetters operating in different areas.

Biological criticisms of the Kenai sport and personal use fisheries are inevitably colored by social issues associated with these fisheries. Social concerns include fishery crowding, a large influx of seasonal visitors, and competition among competing fishery interests. However, allocation and social issues require policy and social solutions. It is disingenuous to substitute biological justifications for political or social aims.

IX. KENAI COHO SPORT FISHERY

If there are enough coho salmon to support significant commercial harvest during August, then there are enough to restore the sport bag limit to three coho

Background

- For nearly 40 years, the daily bag and possession limit for coho salmon in the Kenai River was three fish, 16 inches or greater in length.
- In response to low coho abundance during the late 1990's, bag and possession limits were reduced to two fish as part of a comprehensive plan that included restrictions on commercial fisheries.
- Since that time, abundance has improved, yet the sport fishery still operates under the lowered bag and possession limit for the first part of the run during August.
- During the recent period of low king salmon abundance, coho became much more important to the recreational fishery during August than in the past.

Issue

Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.

If there are enough coho salmon to support significant commercial harvest during August of this sport priority species, then there are enough to restore the bag limit to three coho. If there aren't enough coho to restore the 3-fish bag limit, then there aren't enough to justify expansion of the commercial fishery during August.

Increasing the bag and possession limit from 2 to 3 fish in August would not jeopardize the sustained yield for the resource, would provide increased opportunity for harvest and would produce additional economic value for the fishery.

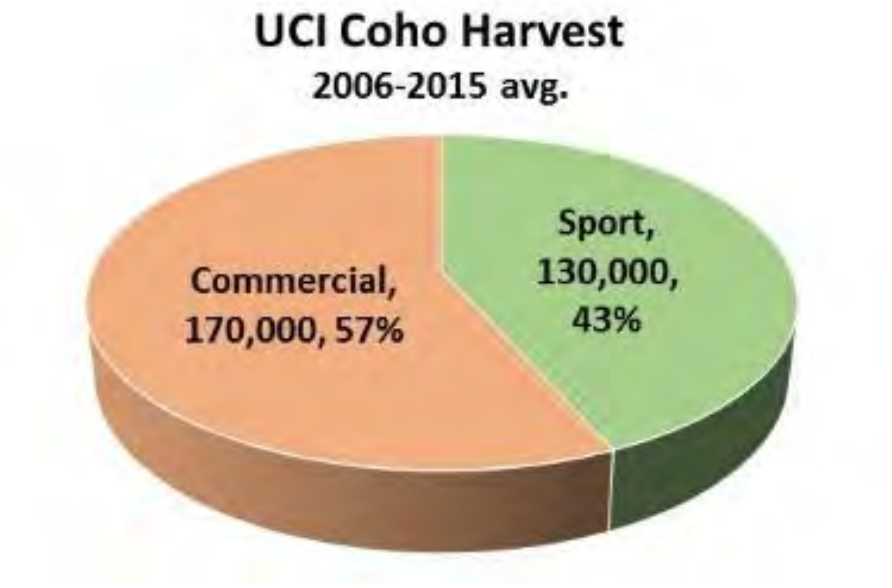


Figure 8. Recent average harvests and harvest shares of Upper Cook Inlet coho salmon.

KRSA Proposal (#191) –Kenai Coho Salmon Bag Limits

Increase coho daily bag and possession limit in the Kenai River from two fish to three fish beginning on the day after the closure of the set net fishery in the Upper Subdistrict.

Corresponding regulatory changes in 5 AAC 57.160 are:

(C) from July 1 through **the day upon which the set net fishery in the Upper Subdistrict is closed for the season** [AUGUST 31], the daily bag and possession limit for coho salmon 16 inches or greater in length is two fish;

(D) from **the day after the set net fishery in the Upper Subdistrict is closed for the season** [SEPTEMBER 1] through November 30, the daily bag and possession limit for coho salmon 16 inches or greater in length is three fish;

X. PERSONAL USE FISHERIES

The UCI personal use fishery is the largest resident only fishery in Alaska, and puts more fish in more freezers of Alaskans that any other state fishery

Background

- Personal use fisheries have a long and dynamic history in UCI but current fisheries were generally established in 1996. Since then popularity and participation have steadily increased.
- As many or more than 30,000 household permits are now fished annually with a peak effort of 43,799 household-days in 2013.
- Harvest has averaged 97% sockeye with small numbers of other salmon species. Combined harvest of sockeye reached a record 630,400 in 2011.
- Harvest opportunity in the Kenai and Kasilof personal use fisheries depends on high and somewhat predictable fish counts. Kenai sockeye counts of about 50,000 are needed before catch rates are adequate to make fishing worthwhile.
- Because most of the Kenai and Kasilof participants are not local, participants typically require some lead time and planning to make the trip. Limited and unpredictable escapement patterns associated with emergency openings of the ESSN fishery can throw the personal use participation off balance and reduce effort, harvest, and allocation.

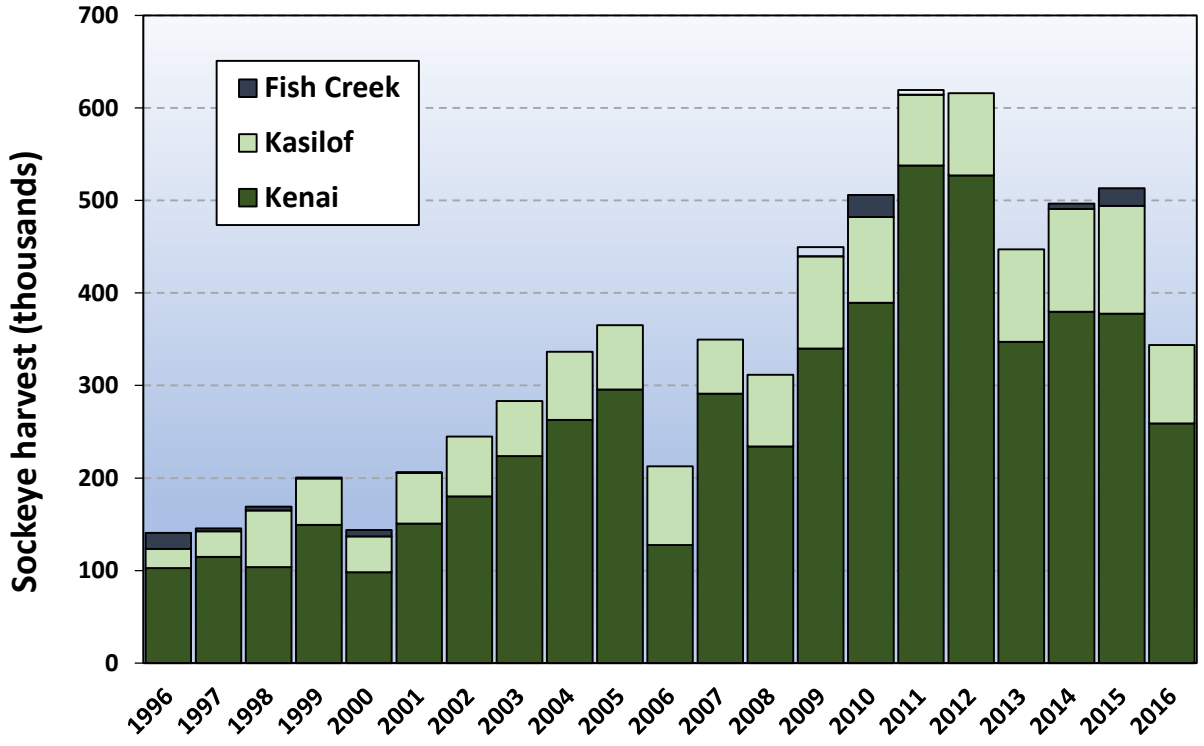


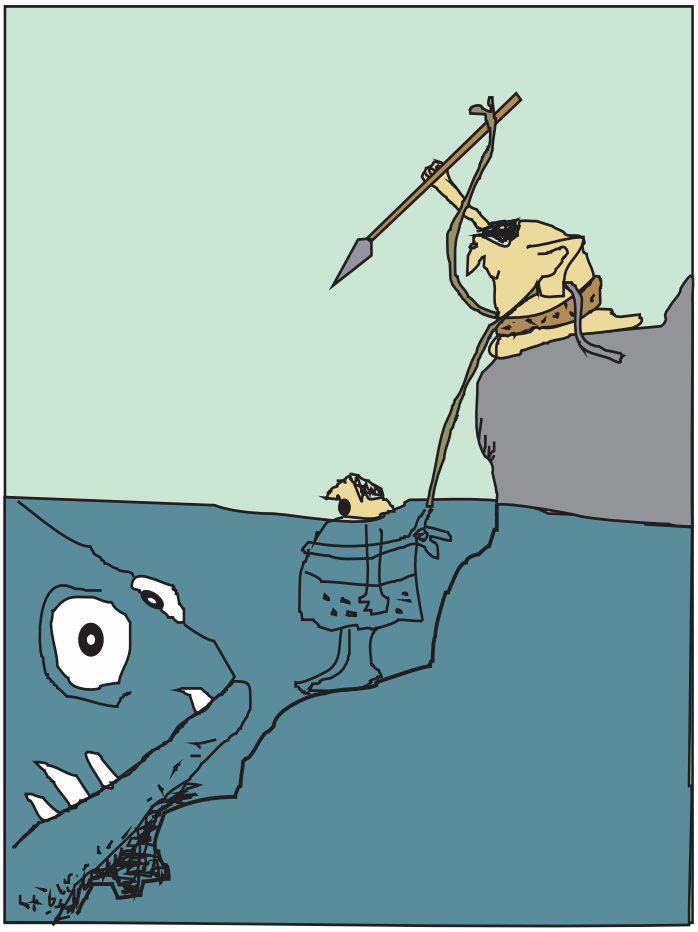
Figure 9. Personal use fishery harvest of sockeye.

Issue

Tremendous growth in the UCI personal use fisheries over the last two decades attests to the high value placed by Alaskans on the opportunity to harvest salmon for their tables in a family outdoor activity.

The popularity of the personal use fishery has led to growing pains while access and infrastructure to the limited fishing area have struggled to catch up. However, the economic value and activity generated by the fishery easily justify and support significant investments in the facilities and systems needed for effective opportunity, regulation and management.

Personal use fishing in the Kenai River from boats currently occurs from Kenai City Dock up to the Warren Ames Bridge at RM 5, and includes boat/motor restrictions starting at the Kenai River Special Management Area boundary at RM 4. Limited periods when sockeye are available and the small fishing area results produces a fishery that is crowded at times.



Now Grog, Now!

KRSA Proposal (#204) –Kenai Personal Use Boat Fishery Boundary Extension

Extend the boundary of the Kenai River personal use dip net boat fishery upsteam to Cunningham Park.

Explanation

This extension would provide additional area for boats to fish and reduce congestion in the area downstream of the Warren Ames Bridge. This proposed area is within the Kenai River Special Management Area, where boat motors while fishing are restricted to 50 horsepower or less. Currently, little sport fishing occurs below Cunningham Park without bait with current low participation. The king sport fishery in this area is only viable in years when water conditions are just right. Thus, there would be little user conflict between the Warren Ames Bridge and the proposed extension up to Cunningham Park.

XI. KRSA POSITIONS

Group 1 - Kenai Late-run Sockeye Management Plan & Set Gillnet Fishery

Kenai River Late-Run Sockeye Management Plan

116 [ADF&G] Review the optimal escapement goal (OEG) and inriver goals for Kenai River late-run sockeye salmon. There is broad support for a review of both the escapement and inriver goals for Kenai River Late-Run sockeye. The Plan calls for obtaining escapements throughout the Optimum Escapement Goal range but the upper bounds of the inriver goals, which are the management objectives for ADF&G commercial fisheries managers, are TOO LOW to provide for escapements within the upper half of the OEG range once the harvest in the sport fishery upstream of the sonar is accounted for. **SUPPORT RAISING THE INRIVER GOALS SUBSTANTIALLY.**

117 [UCIDA, Melenchek] Amend the *Kenai River Late-Run Sockeye Salmon Management Plan* to remove the optimal escapement goal for Kenai River late-run sockeye salmon. **OPPOSE**

Kenai Late-Run sockeye are the primary target of the commercial fisheries in the Central District of Upper Cook Inlet. On years when the total run to Kenai is larger than average (4.6 plus million fish) to achieve the escapement objective of one million the run must be exploited at a rate of roughly 80%. No other stock or species sockeye, coho or king salmon present in Upper Cook Inlet at the same time can sustain an exploitation rate of the magnitude. The OEG for Kenai was designed to allow for additional escapement in the Kenai on years of large runs. When adopted in 1999 the estimated additional number of fish was 200,000 which was then added to the upper bound of the Sustainable Escapement Goal (SEG) of 700,000-1,200,000 to form an OEG of 700,000-1,400,000.

118 [Central Peninsula AC] Remove the optimal escapement goal for Kenai River late-run sockeye salmon and add the guided sport fishery to the list of fisheries managed under the plan. **OPPOSE**

119 [M. Drucker & Beaudoin] Amend management plan to achieve inriver goal range of 850,000–1,050,000 late-run sockeye salmon at run strengths less than 2.3 million sockeye salmon and 950,000– 1,150,000 late-run sockeye salmon at run strengths greater than 2.3 million sockeye salmon. **OPPOSE**

120 [S. Drucker] Decrease the inriver goal ranges for late-run Kenai River sockeye salmon by 100,000 fish and limit the bag and possession of sockeye salmon to three per day and three in possession in the Kenai River sport fishery. **OPPOSE**

121 [Garcia] Repeal and readopt management plan to remove the optimal escapement goal, mandatory restrictions and closed fishing periods or “windows”, and specify that management will be based on the abundance of late-run Kenai River sockeye salmon. **OPPOSE**

122 [McCombs] Remove mandatory closed fishing periods or "windows" from the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**

Upper Subdistrict Set Gillnet Fishery

134 [Central Peninsula AC] Remove restrictions in the Upper Subdistrict commercial set gillnet fishery and allow for regular weekly fishing periods through July 20 with additional fishing periods based on inseason abundance. **OPPOSE**

135 [Person] Redefine sections and manage the commercial set gillnet fishery in the Upper Subdistrict with three sections with staggered opening dates. **OPPOSE**

137 [Central Peninsula AC] Remove “one-percent rule”, where the commercial set gillnet fishery will close after July 31, if less than one percent of the season’s total sockeye is harvested in two consecutive fishing periods. **OPPOSE**

138 [KPFA] Remove the one-percent rule that applies to the commercial set gillnet fishery in the Upper Subdistrict after July 31 so that the set gillnet fishery will close August 15 and be managed using regular fishing periods from August 11 through August 15. **OPPOSE**

139 [Drucker] Repeal the one-percent rule, as it applies to the Upper Subdistrict set gillnet fishery so that the set gillnet fishery will close August 15. **OPPOSE**

136 [Hollier] Allow commercial fishing with set gillnets in the North Kalifonsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8. **OPPOSE**

140 [Hollier] Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth. **OPPOSE**

141 [KRSA] Limit the depth of all set gillnet gear in Upper Subdistrict of the Central District to no more than 29 meshes deep. **SUPPORT**

Group 2 - Kenai River Late-Run King Salmon Management Plan

162 [KRSA] Establish an optimal escapement goal for Kenai River late-run king salmon. KRSA proposal to increase upper bound of goal range - **SUPPORT**

163 [KPFA] Prohibit bait on runs less than 22,000 and eliminate 12-hour fishing period restriction. **OPPOSE**

160 [KAFC] Prohibit use of bait in the late-run Kenai River king salmon fishery until escapement goals have been met. **OPPOSE**

161 [Brush] Start the Kenai River king salmon sport fisheries as unbaited, single-hook, artificial lure, no retention. This already happens at low levels of abundance as part of the Plan. **OPPOSE**

173 [Beaudoin] Decrease the projected inriver run goal of late-run king salmon to 19,000 fish and remove the Upper Subdistrict commercial set gillnet fishery from "paired" restrictions. **OPPOSE**

168 [Doner] Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery in July and August. **OPPOSE**

169 [Shadura] Remove restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery in July and August. **OPPOSE**

172 [McCombs] Remove "paired" restrictions in the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**

167 [Vanek] Close the Kenai River personal use fishery when the late run king salmon sport fishery is closed**. OPPOSE**

174 [Beaudoin] Remove provisions (e)(3)(A) (i) and (ii) that restrict the number and/or depth of commercial set gillnets fished by a Commercial Fisheries Entry Commission limited entry permit holder in the Upper Subdistrict if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**

175 [Person] Clarify (the author wants to use four nets, not the three described in regulation) the length and depth of set gillnets that may be used in the Upper Subdistrict commercial salmon fishery, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**

171 [Goodman] Remove the commercial set gillnet fishery in the Kasilof Section from "paired" restrictions in the *Kenai River Late-Run King Salmon Management Plan*. **OPPOSE**

176 [Shadura] Allow commercial set gillnet fishing periods in the Kenai and Kasilof sections to be managed separately, with regard to "paired" restrictions, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**

177 [Anchorage AC] Allow commercial fishing periods in the Kasilof and Kenai/East Forelands sections to be opened separately, with regard to "paired" restrictions, if the use of bait is prohibited in the Kenai River sport fishery. **OPPOSE**

165 [Hollier] Decrease the trigger for management actions on Kenai River late-run king salmon AFTER AUGUST 1 from 22,500 to 16,500. **OPPOSE**

166 [KAFC] Modify season dates and area for Kenai River late-run king salmon management. The author seeks to reduce both time and area open to sport fishing for king salmon in the Kenai River substantially. **OPPOSE**

164 [Ducker] Repeal and readopt the *Kenai River Late-Run King Salmon Management Plan*. **OPPOSE**

170 [Ware] Reconsider "paired" restrictions to the Kenai River sport and personal use fisheries and the Upper Subdistrict commercial set gillnet fishery. **OPPOSE**

Group 3 - Kasilof River Salmon Management Plan

106 [Young] Replace the optimal escapement goal with the sustainable escapement goal for Kasilof River sockeye salmon. **OPPOSE**

107 [Central Peninsula AC] Replace the optimal escapement goal with a sustainable escapement goal for Kasilof River sockeye salmon. **OPPOSE**

108 [Beaudoin] Replace the optimal escapement goal with the current biological escapement goal for Kasilof River sockeye salmon. **OPPOSE**

99 [Blossum] Amend management plan to remove all restrictions and manage the commercial set gillnet fishery to harvest surplus Kasilof River sockeye salmon. **OPPOSE**

100 [Beaudoin] Open the commercial set gillnet fishery in the Kasilof Section as early as June 20 if the department estimates 50,000 sockeye salmon will be in the Kasilof River before June 25. **OPPOSE**

101 [Shadura] Allow commercial fishing with set gillnets within 600 feet of shore in the Kasilof Section, with fishing time occurring 600 feet or less offshore not subject to the hourly restrictions in the *Kenai River Late-Run Sockeye Salmon Management Plan*. **OPPOSE**

102 [Ducker] Amend management plan to allow commercial fishing with set gillnet gear in the Kasilof Section within one-half mile of shore and eliminate the provision allowing commercial fishing with set gillnet gear only within 600 feet of shore in the Kasilof Section. **OPPOSE**

103 [KRSA] Add a 24-hour no fishing window on Tuesday in the Kasilof Section through July 7 and adopt mandatory no fishing windows in the Kasilof River Special Harvest Area after July 7. **SUPPORT**

104 [Ducker] Reduce the closed fishing period or "window" and increase additional fishing time with set gillnet gear in the Kasilof Section. **OPPOSE**

105 [Every] Allow commercial fishing with set gillnet gear in the North Kalifonsky Beach statistical area (NKB - stat area 244-32) when the upper end of the Kasilof sockeye salmon escapement goal range is projected to be exceeded. **OPPOSE**

109 [ADF&G] Provide clarification on the use of gear in the Kasilof River Special Harvest Area (KRSHA) for individuals who hold two Cook Inlet set gillnet Commercial Fisheries Entry Commission (CFEC) limited entry permits. **KRSA has taken no position on**

proposals addressing the conduct of commercial fisheries within the Special Harvest Area.

110 [Person] Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one gillnet per limited entry permit held. **NO POSITION**

111 [Shadura] Allow a Commercial Fisheries Entry Commission limited entry permit holder to commercial fish in the Kasilof River Special Harvest Area with one set gillnet per limited entry permit held. **NO POSITION**

112 [Hollier] Allow holders of two Commercial Fisheries Entry Commission set gillnet limited entry permits to fish two set gillnets in the Kasilof River Special Harvest Area. **NO POSITION**

113 [Central Peninsula AC] Remove restrictions on the amount of drift or set gillnet gear a vessel may have on board within the Kasilof River Special Harvest Area. **NO POSITION**

114 [Person] Require all nets, buoys, ropes and anchoring devices to be removed from the Kasilof River Special Harvest Area when this area is closed to commercial fishing. **NO POSITION**

115 [ADF&G] Define the boundary that separates set gillnet from drift gillnet gear in the Kasilof River Special Harvest Area (KRSHA), and define the outside boundaries of the KRSHA. **SUPPORT**

Group 4 - Central District Drift Gillnet Fishery Management Plan

85 [Garcia] 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. **OPPOSE**

86 [Central Peninsula AC] 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. **OPPOSE**

89 [UCIDA] 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. **OPPOSE**

87 [Hillstrand] Amend *Central District Drift Gillnet Fishery Management Plan* to maximize commercial harvest of sockeye salmon. **OPPOSE**

88 [McCombs] 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. **OPPOSE**

90 [UCIDA] Remove restrictions on the commercial drift gillnet fishery from July 1–31 and manage the drift gillnet fishery based on inseason salmon abundance. **OPPOSE**

91 [Central Peninsula AC] Remove area restrictions imposed on the commercial drift gillnet fishery during July 9– 15 and 16–31 time periods. **OPPOSE**

92 [Mat-Su Valley AC] Restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15. **SUPPORT**

93 [AOC] Amend preamble of management plan and restrict commercial drift gillnet fishery to the Expanded Corridor and Drift Gillnet Area 1 from August 1–15. **SUPPORT**

95 [ASFA] Restrict commercial drift gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1–15**. SUPPORT**

94 [Central Peninsula AC, UCIDA] Remove the one-percent rule, as referenced to both the set and drift gillnet fisheries, from the drift gillnet management plan. **OPPOSE**

97 [McCombs] Repeal the drift and set gillnet one-percent rules that apply from August 1–15. **OPPOSE**

96 [Hillstrand] 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. **OPPOSE**

98 [Glassmaker] 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. **SUPPORT CONCEPT**

Group A - Cook Inlet Areawide & Northern Cook Inlet Sport Fisheries

Cook Inlet Areawide Sport Fisheries (5 Proposals)

14 [Housh] Allow snagging for sockeye salmon in all Cook Inlet freshwater lakes (*This proposal will be considered at the UCI and LCI meetings*). **OPPOSE**

34 [Housh] Allow party fishing in Cook Inlet fresh and salt water for all species except king salmon (*This proposal will be considered at the UCI and LCI meetings*). **OPPOSE**

144 [Anchorage AC] Require that when proxy fishing in Upper Cook Inlet, once a bag limit is taken the next legal bag limit caught must be retained. **OPPOSE**

145 [McCormick] Allow only barbless hooks in Upper Cook Inlet flowing waters closed to salmon fishing. **OPPOSE**

146 [Central Peninsula AC] Require the use of circle hooks when fishing for sockeye salmon. **OPPOSE**

Knik River, Anchorage Area (13 Proposals)

233 [ADF&G] Extend the area closed to sport fishing downstream of the Little Susitna weir. **SUPPORT**

225 [Young] Reduce the bag limits for salmon, other than king salmon, and prohibit releasing coho salmon. **OPPOSE**

232 [ADF&G] Modify the Fish Creek personal use fishery to accommodate a new Sustainable Escapement Goal (SEG) range. **QUESTIONS REMAIN NO POSITION**

228 [Busch] Increase the hours open to fishing in Fish Creek. **SUPPORT**

235 [Stier] Increase the hours open to fishing on Cottonwood Creek. **SUPPORT**

236 [Warta] Increase the hours open to fishing in the Wasilla Creek / Rabbit Slough drainage. **SUPPORT**

234 [ADF&G] Open waters in a closed area on Wasilla Creek within 300 feet of Palmer Fishhook Road to sport fishing. **SUPPORT**

224 [Counch] Restrict hours and dates open to fishing on Jim Creek. **SUPPORT**

237 [ADF&G] Amend the regulations for the Anchorage Bowl Drainages to allow harvest of salmon, other than king salmon, that are less than 16 inches in length.

238 [ADF&G] Add Lower Sixmile Lake to the list of stocked lakes.

240 [ADF&G] Close all fishing on a portion of Campbell Creek when that portion is not open to coho salmon fishing.

239 [Slinker] Create a youth-only fishery on Ship Creek.

241 [ADF&G] Extend the area closed to sport fishing on Ship Creek.

Group B - Fishing Districts, etc.

Fishing Districts & Gillnet Specifications & Operations (4 Proposal)

84 [ADF&G] Clarify closed waters around the Kenai and Kasilof Rivers. **SUPPORT**

131 [Shadura] Define commercial fishing statistical areas in the Upper Subdistrict set gillnet fishery. **KRSA SUPPORTS ADF&G Position**

132 [UCIDA] Move the southwestern-most point of the Expanded Kasilof Section 1.2 nm west so it aligns with the northwestern-most point of the Expanded Anchor Point Section. **OPPOSE**

133 [Merchant] Allow a single person holding two Commercial Fisheries Entry Commission Cook Inlet drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear. **OPPOSE**

Pink Salmon Management Plan (4 Proposals)

It is not possible to increase commercial harvest of pink salmon without increasing the commercial harvest of coho salmon. Coho salmon are vitally important to the sport fisheries. Pink salmon are of low value most years and have never comprised more than 1% of the total ex-vessel value of salmon in the commercial fishery.

123 [Central Peninsula AC] Repeal and readopt the management plan to allow for the commercial harvest of surplus pink salmon in the Upper Subdistrict with set and drift gillnet gear. **OPPOSE**

124 [Hollier] Amend the *Cook Inlet Pink Salmon Management Plan* to remove or lower the daily harvest triggers. **OPPOSE**

125 [KPFA] Remove mesh size restrictions on set and drift gillnet gear in the commercial pink salmon fishery. **OPPOSE**

126 [Beaudoin] Increase maximum mesh size for set gillnets to 5-inches and expand the fishing season to August 6–15 in the commercial pink salmon fishery. **OPPOSE**

Upper Cook Inlet Management Plan (4 Proposals)

127 [KRSA] Remove inriver goals from the list of escapement goals in the *Upper Cook Inlet Salmon Management Plan* and realign inriver and escapement goals in the *Kenai River Late-Run Sockeye Salmon Management Plan*. **SUPPORT**

The important factor in this proposal is that subsection (e) of this Plan directs the ADF&G to manage for escapement goals even if it means that the management can go outside of restrictions adopted in established plans. Inriver goals are considered an escapement goal for the purpose of this Plan, they are not! The only inriver goals in UCI are for late-run Kenai River sockeye and the inriver goals are too low making it almost impossible for managers to stay within the target. Managers then ignore provisions of the Drift Plan that create the Conservation Corridor, the hour limits on the ESSN and the 1% rules. Inriver goals must be removed from list.

128 [Central Peninsula AC] Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **OPPOSE**

129 [UCIDA] Amend plan to prioritize the need to harvest all surplus salmon stocks and to maximize economic yield and the overall benefits from salmon stocks managed under the plan. **OPPOSE**

130 [Hillstrand] Amend *Upper Cook Inlet Salmon Management Plan* so that fishery restrictions on fully allocated stocks of concern are shared among all user groups in proportion to the respective user group harvest of that stock. **OPPOSE**

West Cook Inlet Salmon (1 Proposal)

142 [Glassmaker] Close waters within one statute mile of the terminus of Kustatan, Drift, and Big rivers, and Bachatna Creek; as measured from mean lower low water, to commercial fishing. **SUPPORT CONCEPT, CASE BY CASE EXAMINATION**

Cook Inlet Smelt (1 Proposal)

143 [Vanek] Increase the amount of smelt that may be taken in the Cook Inlet commercial smelt fishery from 100 tons to 200 tons annually. **ADDITIONAL INFORMATION IS NEEDED**

Group 5 – Kenai/ Kasilof King Sport Fisheries, Vessel/Habitat Restrictions & Guides

Kenai River King Salmon (13 Proposals)

149 [KRSA] Revise *Kenai River and Kasilof River Early-run King Salmon Management Plan*. KRSA proposal **SUPPORT**

148 [Blossum] Rewrite the *Kenai River and Kasilof River Early-run King Salmon Management Plan* to redefine early-run stocks and establish age- and sex-based escapement goals. **OPPOSE**

147 [Brush] Start the Kenai River early-run king salmon fishery as an unbaited, single-hook, artificial lure, no retention fishery. **OPPOSE**

150 [Wackler] Start the Kenai River king salmon sport fisheries as single-hook, no bait, non-retention. **OPPOSE**

153 [KAFC] Prohibit fishing for king salmon from markers 300 yards below Slikok Creek upstream to Skilak Lake. **OPPOSE**

154 [Pearson] Expand the waters of the Kenai River closed to fishing for king salmon. **OPPOSE**

155 [USFWS] Expand the waters of the Kenai River closed to fishing for king salmon. **OPPOSE**

156 [KAFC] Replace slot limit for Kenai River king salmon with maximum size limit to prohibit retention of king salmon greater than 42 inches in length. **OPPOSE**

159 [USFWS] Extend the time that the slot limit for Kenai River king salmon is in effect. **OPPOSE**

157 [KAFC] Modify the annual limit of king salmon from the Kenai River to two fish, only one taken prior to July 1. **OPPOSE**

158 [Brush] Modify the annual limit of two king salmon for the Kenai River to include only one large fish. **OPPOSE**

151 [Brush] Repeal barbless hook provisions in Lower Kenai River. **OPPOSE**

152 [KRPGA] Expand the dates to prohibit back trolling and tie to prohibition of bait. **OPPOSE**

Kenai River Vessels and Habitat Restrictions (4 Proposals)

178 [Corr] Increase the number of days only non-motorized vessels may fish on the lower Kenai River. **OPPOSE**

179 [KAFC] Add Thursdays as a day only non-motorized vessels may fish on the Kenai River downstream of Skilak Lake. **OPPOSE**

180 [ADF&G] Establish two Kenai River riparian habitat areas equal to approximately nine-tenths of a mile that will be closed to fishing from shore within 10 feet of the waterline from July 1 – August 15. **SUPPORT**

181 [McCombs] Only non-motorized vessels may be used when fishing on the Kenai River. **OPPOSE**

Guides Kenai and Kasilof Rivers (4 Proposals)

182 [Wellman] Prohibit all guiding from 6 p.m. to 6 a.m. **OPPOSE**

183 [Erickson] Allow guided anglers to fish on Mondays in August. **OPPOSE**

185 [Wilson] Modify language referencing fishing from guide boats on the Kenai River to include all guided fishing. **OPPOSE**

184 [Erickson] Relax guiding restrictions when king salmon fishing is closed by emergency order. **OPPOSE**

Group 6 - Kenai, Kasilof, Russian River Sport & Personal Use

Kenai, Kasilof & Russian River Sport (9 proposals)

186 [McCormick] Only barbless hooks allowed in Kenai River upstream of the Lower Killey River. **OPPOSE**

187 [Corr] Allow only barbless, unbaited, single-hook gear on the Kenai River from January 1 – August 1. **OPPOSE**

188 [KAFC] Allow only one single-hook or one single-hook lure. **OPPOSE**

189 [Erickson] Allow fishing from shore after harvesting a bag limit of coho salmon. **OPPOSE**

190 [KRPGA] Expand the waters open to fishing after harvesting a bag limit of coho salmon in the lower Kenai River. **OPPOSE**

191 [KRSA] Increase Kenai River coho salmon bag limit from two fish to three the day after the ESSN commercial fishery closes. **SUPPORT**

192 [KRPGA] Shorten the Kenai River coho season by closing October 31. **NEUTRAL**

193 [Robbins] Create an archery fishery for sockeye salmon in a section of the Russian River. **OPPOSE**

194 [Lee] Create a size limit for lake trout on Hidden Lake. **DEFERRED TO ADF&G**

Kenai River Personal Use (13 Proposals)

195 [Koch – City of Kenai] Remove the commissioner's emergency order authority to extend the Kenai River personal use fishery hours. **OPPOSE**

196 [Vanek] Prohibit dip nets from being attached to a vessel. **OPPOSE**

197 [Vanek] Prohibit dipnetting from a vessel that is not anchored in the Kenai and Kasilof river personal use fisheries. **OPPOSE**

198 [Vanek] Prohibit webbing in personal use dip nets that exceeds 2.5 inch stretched measure. **OPPOSE**

199 [Kenai/Soldotna AC] Prohibit dipnetting on the Kasilof River from a vessel with a motor on board greater than 10 horsepower. **OPPOSE**

200 [Shadura] Amend the number of king salmon that may be retained in the Upper Cook Inlet personal use fishery to 10 king salmon under 20 inches. **OPPOSE**

201 [ADF&G] Amend the area open to dipnetting from shore in the Kenai River personal use dip net fishery. **OPPOSE**

202 [Jordan] Extend the Cook Inlet personal use dip net fisheries to the 2nd Sunday of August. **OPPOSE**

203 [AOC] Extend the season and liberalize the bag limit in the Kenai River personal use fishery when the sonar estimate is projected to exceed 1.2 million sockeye salmon. **OPPOSE**

204 [KRSA] Extend the boundary of the Kenai River personal use dip net boat fishery upstream to Cunningham Park. **KRSA PROPOSAL SUPPORT**

205 [SCADA] Allow shore based personal use dipnetting in the Kenai River upstream to Skilak Lake when the ADF&G increases the bag limit in the sport fishery from 3 to 6 fish. **SUPPORT**

206 [Madison] Create an area upstream of the Kenai River personal use fishery where recording and fin clip requirements are waived for fish that have not been off loaded. **OPPOSE**

207 [ADF&G] Amend the boundary description language for the area open to dipnetting in the Kasilof River personal use salmon fishery. **SUPPORT**

Cook Inlet Personal Use (1 Proposal)

208 [Madison] Allow 10 Dolly Varden/Arctic char per household in Cook Inlet Personal Use Fisheries. **OPPOSE**

Group 7 - Northern District Commercial & Susitna River Sport Fisheries

Northern District Commercial Salmon (10 proposals)

209 [Mat-Su Valley AC] Repeal the *Northern District King Salmon Management Plan*. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**

211 [Allen] Close the Northern District commercial set gillnet fishery until the first regular period after June 24, if the Susitna River sport fishery is restricted by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**

210 [Young] Repeal and readopt management plan to fully utilize surplus salmon stocks based on the abundance of salmon returning to the Northern District. **OPPOSE**

212 [AOC] Close the commercial set gillnet fishery in the Northern District on August 15. **SUPPORT**

213 [Mat-Su Borough FWC] Close commercial fishing within one mile of Little Susitna River when the Little Susitna River sport fishery is restricted to no bait. **SUPPORT**

214 [Mat-Su Borough FWC] Close commercial fishing within one mile of the Little Susitna River when more than half of Northern District streams with king salmon escapement goals are closed to sport harvest of king salmon or when the Little Susitna River sport fishery is restricted by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**

215 [Allen] Close commercial fishing within one mile of the Little Susitna River, if the Little Susitna River king salmon sport fishery is restricted to harvest less than 7 days per week and artificial lures by emergency order. **SUPPORT CONCEPT OF PAIRED RESTRICTIONS**

216 [Mat-Su Valley AC, ASFA] Close waters within one-statute mile of the Little Susitna River to commercial fishing. **SUPPORT**

217 [Rollman] Remove the Eastern Subdistrict of the Northern District from commercial set gillnet restrictions that apply July 20–August 6. **OPPOSE**

218 [NDSNCI] Allow a holder of more than one Commercial Fisheries Entry Commission set gillnet limited entry permit to fish with one set gillnet per permit held in the Northern District. **OPPOSE**

Susitna River Sport Fisheries (10 proposals)

230 [Mat-Su Borough FWC] Create a Deshka River King Salmon Management Plan. **SUPPORT CONCEPT**

231 [Counch] Create a Susitna River King Salmon Management Plan. **SUPPORT CONCEPT**

219 [Mathis/Montana Creek Campground] Allow an unbaited, single-hook, artificial lure, no retention fishery on resident species when waters of Montana Creek are closed to fishing for king salmon. **SUPPORT**

221 [McCormick] Prohibit harvest of king salmon in units 2, 3, 5 and 6, except Willow Creek.

223 [Warta] Prohibit king salmon fishing in Unit 2 if no retention is allowed.

220 [Mat-Su Borough FWC] Establish sport fishery closure times in the Larsen Creek drainage. **SUPPORT**

222 [Central Peninsula AC] Prohibit fishing for king, sockeye, and coho salmon in the Larson Creek drainage. **OPPOSE**

226 [B. Allen] Create a bag limit of one hatchery king salmon in the Susitna River drainage.

227 [A. Allen] Allow harvest of hatchery king salmon when emergency orders restrict the sport fishery.

229 [Hallsten, Wallace, Grogan, Gibbs] Reduce the maximum legal size for rainbow trout in Byers Creek from 20 to 16 inches. **OPPOSE**

Group 8 – Regulatory Alignment Sport Fishing

71 [ADF&G] Align size restrictions for Dolly Varden and rainbow trout bag limit in the flowing waters of the Kenai River Drainage Area.

72 [ADF&G] Amend general provisions for lakes and ponds of the Kenai River drainage to restore winter ice fisheries for landlocked coho salmon less than 16 inches in length.

73 [ADF&G] Align the Swanson River rainbow trout spawning closure with the proposed Kenai River drainage rainbow trout spawning closure start date.

74 [ADF&G] Align the Kenai River king salmon sanctuaries start date, and boat closures with the proposed rainbow trout spawning closure start date.

75 [Buntjer] Align dates anglers are prohibited from fishing from boats with rainbow trout closure.

76 [ADF&G] Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar closure periods.

77 [ADF&G] Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar fishing seasons, such that anglers are prohibited from fishing for salmon.

78 [ADF&G] Align the closure start date for all the tributaries of the Upper Section of the Kenai River Drainage Area with the start dates proposed for the king salmon sanctuaries and the start dates proposed for the rainbow trout spawning closure. In addition, create the same fishing season in all the tributaries of the Upper Section of the Kenai River Drainage area.

79 [ADF&G] Change the Kenai River king salmon sanctuaries and the Moose-Kenai rivers confluence area fly-fishing-only waters to artificial fly waters, and align dates for these special provisions with other provisions.

80 [ADF&G] Align gear restrictions for Kenai River tributaries.

81 [ADF&G] Create consistent rainbow/steelhead trout regulations in the Kasilof River above and below the Sterling Highway Bridge and amend the open season date for Tustumena Lake tributaries to protect spawning rainbow/steelhead trout.

82 [ADF&G] Amend Kasilof River early-run king salmon possession requirements.

83 [ADF&G] Repeal gear regulations for northern pike.

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To: Alaska Board of Fisheries

Thank you for this opportunity to comment on proposals.

Proposals 147 and 150: Oppose both. Given the poor runs of recent years, to "maximize opportunity" to catch Kenai River king salmon makes no sense whatsoever. Until such time that adequate spawning escapement can be assured, these fish should be left alone.

Proposal 151: Oppose Barbless hooks have been required in Washington state salmon fisheries for several years, and for good reason. In Washington as well as in Alaska, some salmon have to be released by law, and others are released by the angler's choice. Barbless hooks release more easily and more quickly than barbed hooks, which surely causes less stress to salmon that already may be stressed from other causes. An advantage to anglers and fish alike is that barbless hooks are easier to remove from a net.

Proposal 155: Support The 4.5 miles of the Kenai River immediately downstream from Skilak Lake is a known spawning area for king salmon. These fish aren't moving through, but are there to spawn. They should be left alone. Trout fishing in this area has greatly increased in recent years, causing a higher incidence of incidentally caught kings. This, along with the almost constant noise and disturbance by power-boats surely affects spawning success. There is plenty of fishing opportunity in this stretch of the river without king salmon fishing.

Proposal 159: Support This well-thought-out and researched proposal would extend the existing slot limit and no-bait restriction through July. It addresses several concerns and would benefit early-run king salmon.

Thank you for your consideration.

Les Palmer

Sterling, Alaska

Submitted By
Mark Glassmaker
Submitted On
2/9/2017 7:43:34 AM
Affiliation
MGF

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33361 KEYSTONE DR
SOLDOTNA, Alaska 99669

My name is Mark Glassmaker and I have operated a sportfish guide business on the Kenai River since 1990. My company also offers day trips via floatplane to a number of remote fisheries on the West Side of Cook Inlet. I would like to speak today regarding a suit of proposals that address West Side Cook Inlet coho salmon stocks. Proposal 142, seeks to extend the area closed to commercial fishing near the mouths of the primary West Side Cook Inlet Coho producing streams. Currently the regulations measure stream mouth closure distances from mean high tide and this needs to be changed to mean low tide to better afford the protection intended by this closure. The area in question includes extensive tidal flats and rivers, especially at low tide, that extend well beyond the area where the shoreline vegetation meets the mud flats. They snake their way out to Cook Inlet and the closed waters around the mouths of these rivers should be measured from where they meet salt water at low tide, not merely where the river meets the tidal mud. Current regulations allow commercial vessels to set nets at high tide that essential block off the entire streambed or channel throughout the intertidal portion of that stream inside of the low water mark.

I would also like to comment on proposal 98 which would reduce the sport fish limit from three to two fish and restrict the central district drift gillnet fishery to the expanded Kenai and Kasilof sections when the little Susitna is restricted. I chose the Little Susitna as it is currently the most proximate West Cook Inlet river to Big River and the Kustatan and thus serves as the best available indicator of Northern District and West Cook Inlet coho run strength. Given the increased exploitation of these stocks over the last decade, is seems more than prudent to establish restrictions to both commercial and sport harvest in years of lower coho abundance. I would also like to state my support for proposal 95 which would restrict the commercial gillnet fishery to the Expanded Corridors and Drift Gillnet Area 1 from August 1-15.

Concerning Kenai River issues, I would like to state my support for starting the early run king salmon management with at least catch and release. This conservative approach provides predictability and marketability for the fishery. I would also tentatively support beginning the run with catch and keep, as this will have very little biological impact on runs of low abundance due to low angler participation and success rates. Advantages are increased harvest opportunity, marketability and creel survey data to identify age and condition of fish kept. In regards to first run in season management, I strongly support managing based on a “hurdle” system. A hurdle system would allow management decisions to be at the 25, 50 and 75 percent marks of the run. This would layout clear numbers of fish that the department would use to make management decisions. I strongly feel that the “hurdles” should be based on the mid-point of the escapement goal rather than the low end. Liberalization could occur on runs above the mid-point. The first liberalization tool should be removal of the slot limit. The second liberalization tool would be the use of bait, but only if the upper end of the escapement goal is projected to be exceeded.

For Second Run Season Management, I support status quo. I believe with the current management plan and paired restrictions, managers have the necessary tools to manage the run at all run strengths and particularly at low abundance: are able to restrict both the sport and commercial fisheries to ensure sustainability. I do not support any removal or liberalization of the current paired restirctions as I feel sharing the burden of conservation among all user groups is very important.

I do not support adding additional drift only days for the following reasons:

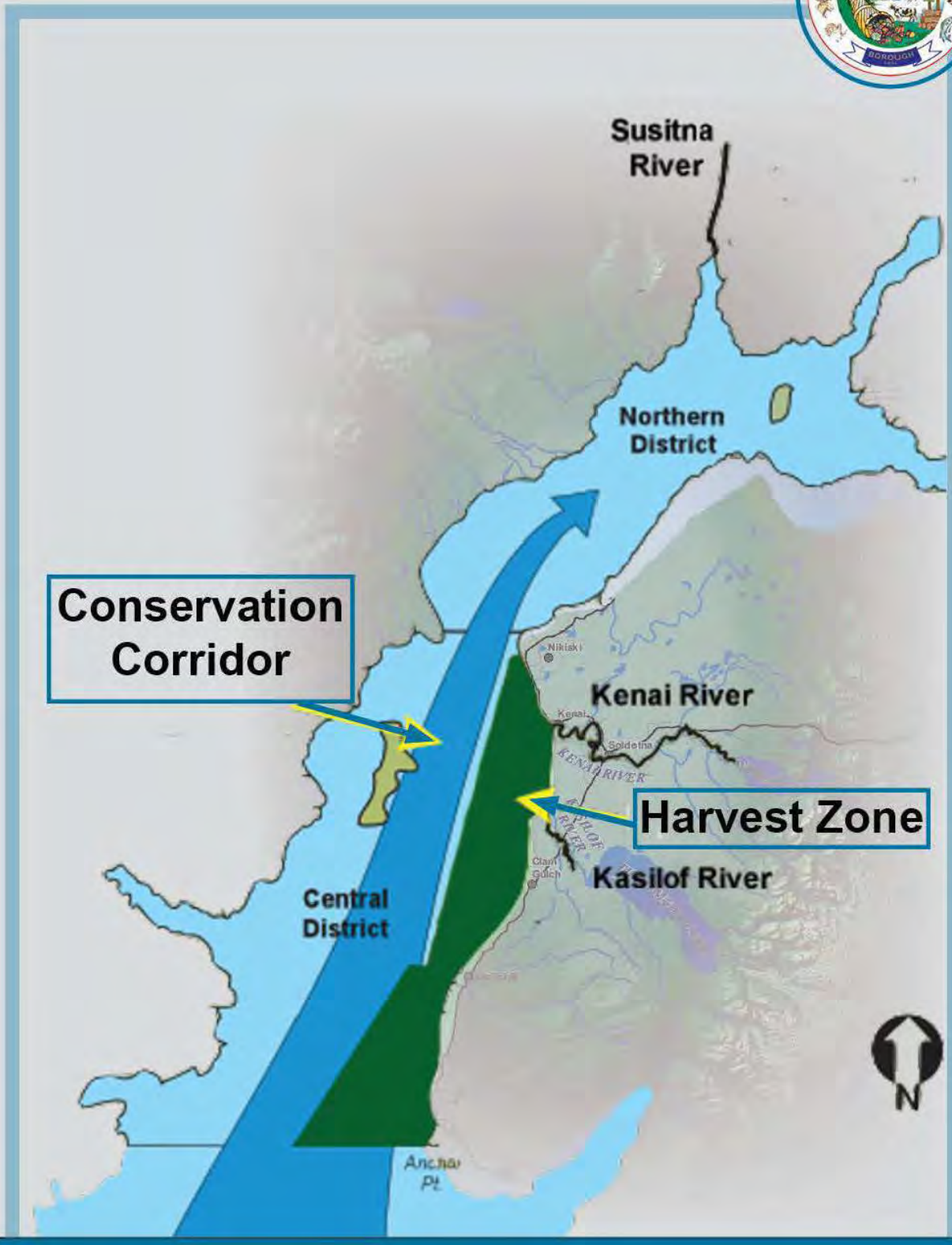
- Drift is currently available at any time.
- There is inadequate infrastructure, restrooms and parking to facilitate launch and retrieval.
- This would necessitate the purchase of a drift boat for those without this resource, thus creating a cost increase to the individual.
- This could lead to an increase in sockeye fishing and crowding on days designated as drift only.

I also do not support implementation of guide hours on guides not fishing from a boat for the following reasons:

- Increased crowding during times when the public normally uses this resource.
- Could lead to an increase in guide numbers.
- There is no biological need.

Report to the Alaska Board of Fisheries

2017



Matanuska-Susitna Borough Fish and Wildlife Commission

Contents

SUMMARY & RECOMMENDATIONS

This report was prepared by the Matanuska-Susitna Borough Fish and Wildlife Commission (referred to hereafter as the Commission) to address critical fishery management concerns under consideration by the Alaska Board of Fisheries in the 2017 Upper Cook Inlet meeting.

Current sport and personal use fisheries in Northern Cook Inlet fail to meet demand by the growing regional population.

- Sport fisheries have been heavily impacted by poor or sporadic coho and king returns. Angler days have fallen to the lowest level in almost 40 years.
- Declining sockeye numbers do not support consistent personal use opportunities in Northern Cook Inlet.
- The Northern Cook Inlet commercial set gillnet fishery for sockeye has been severely reduced over the last 30 years.

The Commission believes that the sustainability of Northern Cook Inlet salmon runs and fisheries has been placed at risk by overfishing in mixed stock commercial fisheries of the Central District.

- Commercial drift and set gillnet fisheries are managed primarily to maximize harvest of the large and productive Kenai and Kasilof sockeye stocks to the detriment of upstream fisheries and less productive salmon stocks.
- Commercial fisheries continue to harvest the majority share of coho despite a long-standing sport fishery priority for this species.
- Commercial fisheries harvest large numbers of Susitna sockeye despite continuing declines and chronic escapement failures.

Fishery management and harvest allocation in Upper Cook Inlet (UCI) has not kept pace with growing demand by the sport and personal use sectors, and is out-of-step with the economic and cultural realities of today. Management continues to be driven by commercial fisheries despite the much greater economic value and participation in sport and personal use fisheries.

- Less than 25% of the UCI salmon harvest is allocated to over 150,000 sport anglers and 30,000 plus personal use fishery households. Over 75% of the salmon harvest in Cook Inlet is taken by fewer than 1,300 limited entry commercial permit holders.
- Over half of the statewide sport fishing effort and the majority of the personal use fishery occurs in UCI Boroughs. UCI commercial fisheries produce less than 5% of the statewide total salmon harvest.
- Sport fisherman spent over $100 million in the Matanuska-Susitna Borough and $700 million in UCI during 2007. In contrast, ex-vessel value of salmon in the commercial fishery currently averages $30 million per year. First wholesale in 2007 was $77 million (last available estimate).

The Commission offers the following recommendations to the 2017 Board of Fisheries:

1. Continue to protect Stocks of Concern – particularly Susitna sockeye.

Susitna sockeye are currently a Stock of Yield Concern. Continuing declines and chronic escapement failures also qualify this stock for listing as a stock of management and conservation concern. Susitna sockeye are tremendously diverse but inherently less productive than Kenai and Kasilof populations which drive Upper Cook Inlet commercial fisheries. Freshwater productivity of Susitna sockeye also appears to be declining. The combination of declined productivity and continuing high harvest rates are a recipe for extinction. Freshwater production problems are an imperative for limiting exploitation, not an excuse for continued overfishing in the mixed stock commercial fishery.

2. Maintain the conservation corridor in the Central District drift gillnet fishery –it is working as designed.

The conservation corridor provides strategic time and area closures in the center of Cook Inlet and expands use of terminal fishing areas based on abundance of the Kenai and Kasilof sockeye. Following corridor adoption, significant increases were observed in sockeye and coho salmon runs to the Mat-Su, local sport fisheries and escapements. The uptick in salmon numbers is part of what we, the Commission, were asking for when the 2014 Alaska Board of Fisheries (BOF) adopted the current drift gillnet fishery management plan.

3. Limit commercial drift gillnet fishing in August to avoid excessive coho harvest.

The commercial drift gillnet fishery is currently closed by regulation in August when less than 1% of the season's total sockeye harvest is caught on two consecutive fishery openers. This rule provides flexibility to extend the commercial fishing season when the sockeye run is late and significant numbers continue to be available for harvest. The rule also ensures that commercial harvest of sport-priority coho and Kenai kings is limited after the sockeye run winds down. This closure rule, as adopted, was meant to be absolute except as otherwise provided under the commissioner's authority to manage to meet escapement goals as a first priority.

4. Continue to provide robust personal use opportunities where stocks permit.

Over 30,000 households now participate in the UCI personal use fishery, harvesting 600,000 or more sockeye salmon per year, primarily from Kenai or Kasilof rivers. The majority of participation comes from residents of areas outside the Kenai Peninsula including the Mat-Su as other regional personal use opportunities are quite limited. The Commission supports maintaining and enhancing personal use fishery opportunities wherever possible. Commercial fishery limitations including closure "windows' are essential for delivering fish to the rivers when sockeye are running. The Commission also supports proposals to increase in-river goals for Kenai late-run sockeye for consistency with current in-river harvest levels.

THE MATANUSKA-SUSITNA BOROUGH FISH & WILDLIFE COMMISSION

Left to right front row: Assembly Member Steve Colligan, Chair Terry Nininger, former Chair Larry Engel, Jehnifer Ehmann, Howard Delo. Back row L to R: Mike Wood, Andy Couch, Bruce Knowles, Assembly Member Jim Sykes

The Commission consists of eight dedicated volunteers appointed by the Mayor and Assembly to advise the Assembly and the Alaska State Boards of Fish and Game on policies that affect the resource and the people of the region.

Efforts by the Commission have been heavily focused on salmon concerns including:

- Conservation of diverse and productive natural habitats of fish and wildlife in balance with the needs of the people that live, work, and recreate throughout the region.
- Scientifically sound and sustainable fisheries and wildlife management.
- A fair and equitable balance in the allocation of fish and wildlife resources, values and opportunities for all users.

The Commission has actively supported the development and implementation of effective fishery management plans and strategies. We have sought to foster an effective working relationship with the Alaska Department of Fish and Game (ADF&G); providing regular input on research and management policies and strategies; facilitating the exchange of ideas and knowledge with Mat-Su residents. The Commission has also successfully worked through the Governor's and Legislature's budgeting process to secure critical funding for scientific research and monitoring, and to develop a comprehensive research plan for Mat-Su salmon and factors that affect them.

Commission Members

Members of the Commission combined have over three centuries of life, work and experience in the Mat-Su region, 50 years of expertise as state biologists, 70 years of experience as fishing guides, and 12 years of service on the State's Board of Fisheries.

Terry Nininger (Chairman) — Member of the Mat-Su Valley Fish & Game Advisory Committee and Planning Committee of the Mat-Su Basin Salmon Symposium. Retired, after a career in resource development in Alaska.

Larry Engel—Chair of the Alaska Board of Fish for three years, a member on the BOF for ten years, former fisheries biologist with ADF&G for 30 years including 20 years as Mat-Su Area Manager.

Jehnifer Ehmann — Former President of the Palmer Chamber of Commerce and an avid sports fisher. Chair of the Matanuska Valley Fish & Game Advisory Committee.

Howard Delo — Former member of the Alaska Board of Fish for three years and worked as a biologist with Fish & Game for 21 years, outdoor columnist.

Andy Couch — Fishing guide business owner for 30 years in the Mat-Su, member Matanuska Valley Fish & Game Advisory Committee, fisheries writer.

Mike Wood — Lives on the Susitna River, North of Talkeetna, where he works as a carpenter and builds remote log homes. During the summer he and his family travel to the mouth of the Susitna, to a camp on the Ivan River where they commercial set net fish.

Steve Colligan — Mat-Su Assembly member representative. Lifelong Alaskan and sportsman. Businessman and executive for over 25 years.

Jim Sykes — Mat-Su Assembly member representative. Long-term interest in hunting and fisheries issues since 1985, personal use fisherman, retired hunter and keen interest in sustainable future for fish and wildlife.

Bruce Knowles (emeritus member)—Veteran fishing guide and advocate for sustainable fisheries.

Borough Staff: Frankie Barker, Stefan Hinman, Patty Sullivan

NORTHERN COOK INLET SALMON FISHERIES

Current sport and personal use fisheries
fail to meet demand by the growing regional population

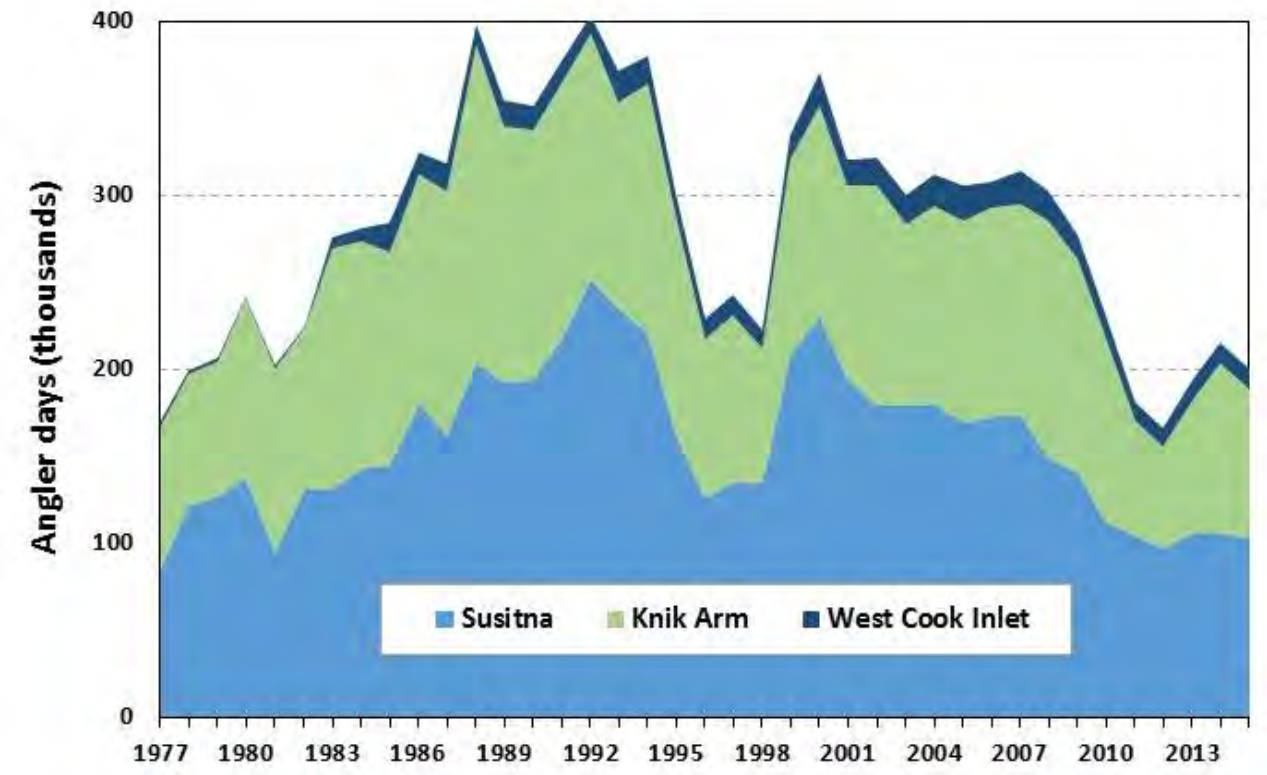


Figure 1. Angler days of sport fishing expended by recreational anglers fishing in Northern Cook Inlet Management Area waters, 1977-2015 (http://www.adfg.alaska.gov/sf/sportfishingsurvey/).

Declining Sport Fishery Participation

- Mat-Su area sport fisheries have been heavily impacted by recent poor King, inconsistent coho and limited sockeye returns to Borough waters.
- Angler days have fallen by over half from a peak of over 400,000 in 1992 to just 165,000 to 215,000 since 2011 – the lowest levels since the 1970s (Figure 1).
- This decline is striking in light of continuing population growth in Southcentral Alaska over this period.
- Effort started rebounding in 2014, with stronger returns of coho salmon to northern waters, following conservation corridor changes adopted by the Board of Fisheries.

Declining Sport Salmon Harvests

- Coho are by far the most popular target of Northern Cook Inlet sport fisheries, followed by Kings (Figure 2).
- Coho harvest has declined by more than 50% since the early 2000s (Figure 2).
- Recent king salmon sport harvests show an 80% decline from peaks in the 1990's. Low king salmon returns and fishery restrictions have particularly impacted road-accessible streams on the east side of the Susitna River.

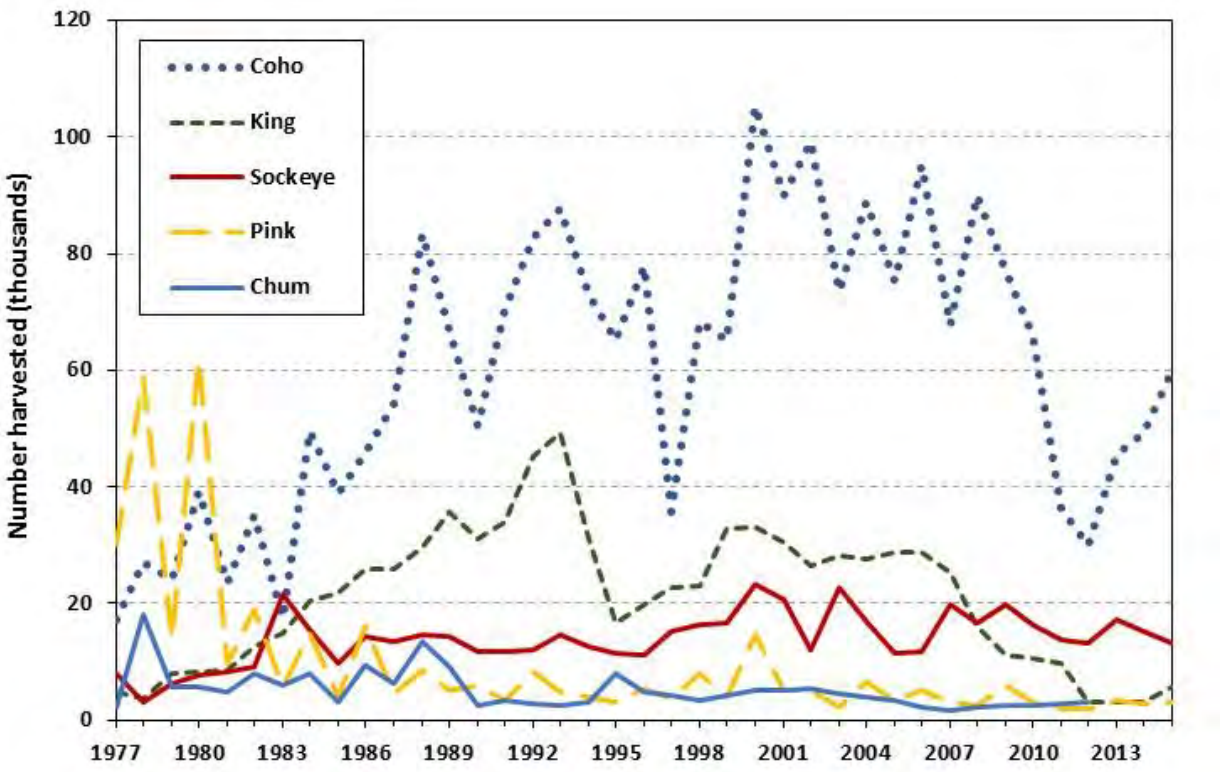


Figure 2. Salmon harvest by recreational anglers fishing in Northern Cook Inlet Management Area waters, 1977-2015 (data from Oslund et al. 2013; Statewide Harvest Survey).

Limited Personal Use Access

- Consistent annual personal use opportunities do not exist in Northern Cook Inlet.
- Only one personal use fishery exists in Northern Cook Inlet (Fish Creek), and too few fish return in most years to open this fishery.
- Northern Cook Inlet residents currently travel to the Kenai Peninsula (or Chitna on the Copper River) to access significant numbers of salmon for personal use.

Limited Northern Cook Inlet Commercial Fishery

The Northern District of Cook Inlet begins at the narrowest part of Cook Inlet and extends to the Susitna River, Knik and Turnigan Arm. This is a set net fishery and no drift fleet is allowed. This is a small-scale, family run fishery with a myriad of difficulties including transport of catch to a processor in the Kenai or Anchorage. Many fisherman have adapted by direct marketing with catcher-seller permits for residential markets in their local areas.

- About 90 Northern District set gillnet permits are registered on average and 80 are fished.
- Harvest by this fishery has been substantially reduced since the 1990s (Figure 3).
- Sockeye harvests have increased since implementation of the conservation corridor in 2014.

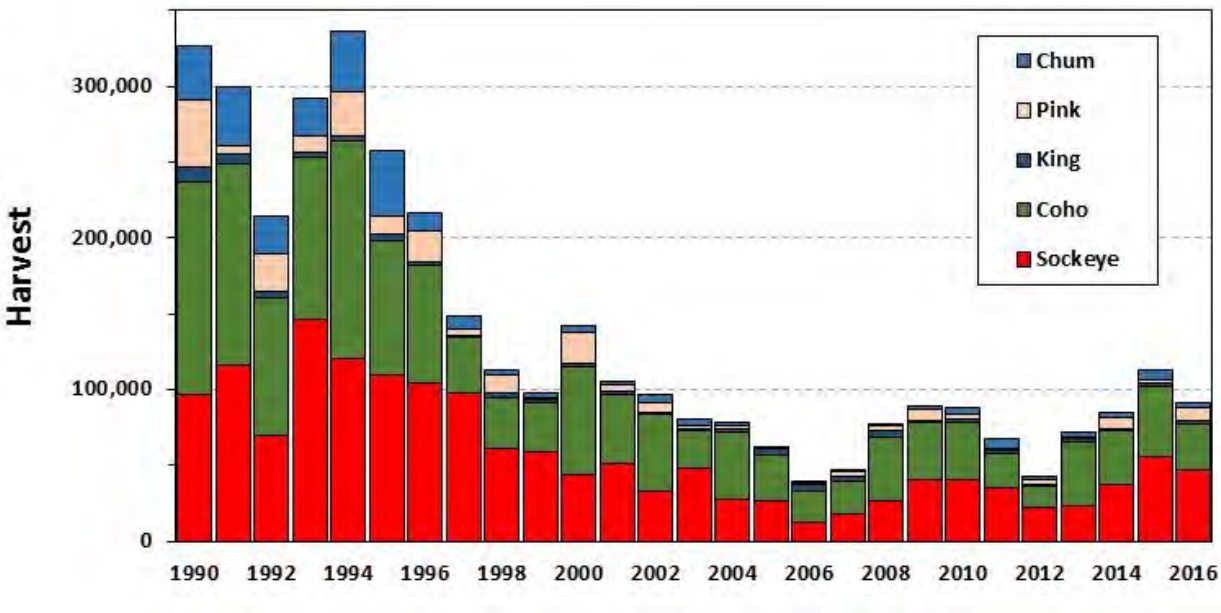


Figure 3. Salmon harvest in Northern District commercial set gillnet fishery.

This fishery varies greatly depending on the location of individual set net fisherman. Primarily it is a "flood tide fishery" lasting only 4 hours total in that 12-hr. period. Legal fishing periods begin in late May/early June for King salmon. One, 12-hour opener occurs per week for the entire Northern District (except recording area "Beluga" at the mouth of the Chuitna, Theodore, Lewis and Big Susitna River, where no fishing is allowed for King salmon due to a "stock of Concern" status). A total of 1,500 to 2,000 king salmon are harvested a year on average in the whole Northern District fishery. Beginning late June, the Northern District fishes every Monday and Thursday for a 12-hour period, being allowed to use a full complement of gear (three 35 fathom nets, set a distance of at least 600' apart). In mid-July ADF&G reduces the gear to 1 net per permit for three openers. The season typically tapers off in August but varies greatly throughout the Northern District of Cook Inlet.

Unbalanced Harvest Sharing

- Harvest allocation in Upper Cook Inlet has not kept pace with growing demand by sport and personal use sectors, and is out-of-step with today's economic and cultural realities.
- Fishery management continues to be driven by commercial fisheries despite much greater economic value and participation in sport and personal use fisheries.
- Less than 25% of the UCI salmon harvest is effectively allocated to over 150,000 sport anglers and 30,000+ personal use fishery households.
- Fewer than 1,300 commercial permit holders take over 75% of the UCI salmon harvest.

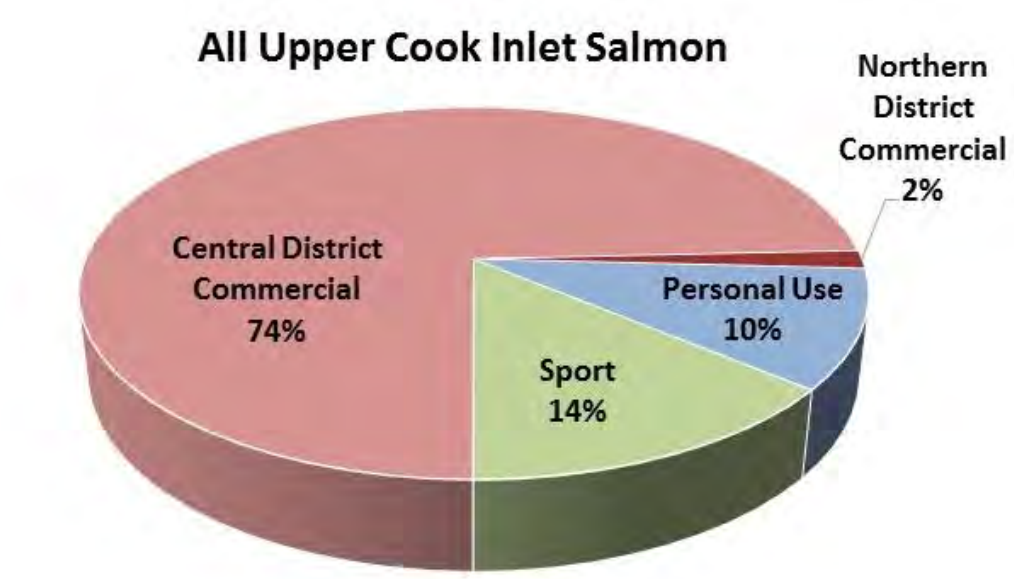


Figure 4. Recent (2006-2015) harvest shares of Upper Cook Inlet salmon among commercial, sport, and personal use fisheries as a result of current management plans.

Myth: UCI Salmon Management is not science based.

Fact: Regulatory decisions by the Board of Fisheries are firmly grounded in science but also guided by values and expectations of the stakeholders.

Science informs but does not dictate resource management decisions. It does not and cannot provide an objective basis for choosing human goals embedded in decisions. Nor is science an allocative weapon. It is a body of organized information, interpretations and qualifications developed to minimize subjectivity – in our case regarding fishery management decisions. Science identifies alternatives, tradeoffs, risks, and uncertainties. To the Board of Fisheries falls the responsibility of identifying fish management plans that balance and optimize sometimes competing fishery values.

COHO ALLOCATION & ESCAPEMENT ISSUES

Commercial fisheries continue to harvest the major share of coho despite a long-standing sport fishery priority for this species

For more than 35 years, Upper Cook Inlet salmon management plans have stipulated that the drift fishery harvest of northern-bound coho is to be minimized in order to provide sportfishers and guided sportfishers with reasonable opportunity to harvest these salmon. Until recently, implementation of this clear directive has not been happening. The drift gillnet fleet continues to catch large numbers of northern-bound coho as "bycatch," while they are actually targeting Kenai sockeye.

Harvest Imbalance

- Commercial fisheries continue to harvest the majority of UCI harvest of coho in spite of a 35-year-old regulatory directive to minimize the harvest of coho for benefit of the sport fishery.
- The commercial drift gillnet fishery is the primary harvester of coho destined for Northern Cook Inlet streams.
- Since 2000, the drift fleet fishery has harvested over 100,000 coho per year on average versus 65,000 in the Susitna/Knik sport fishery.

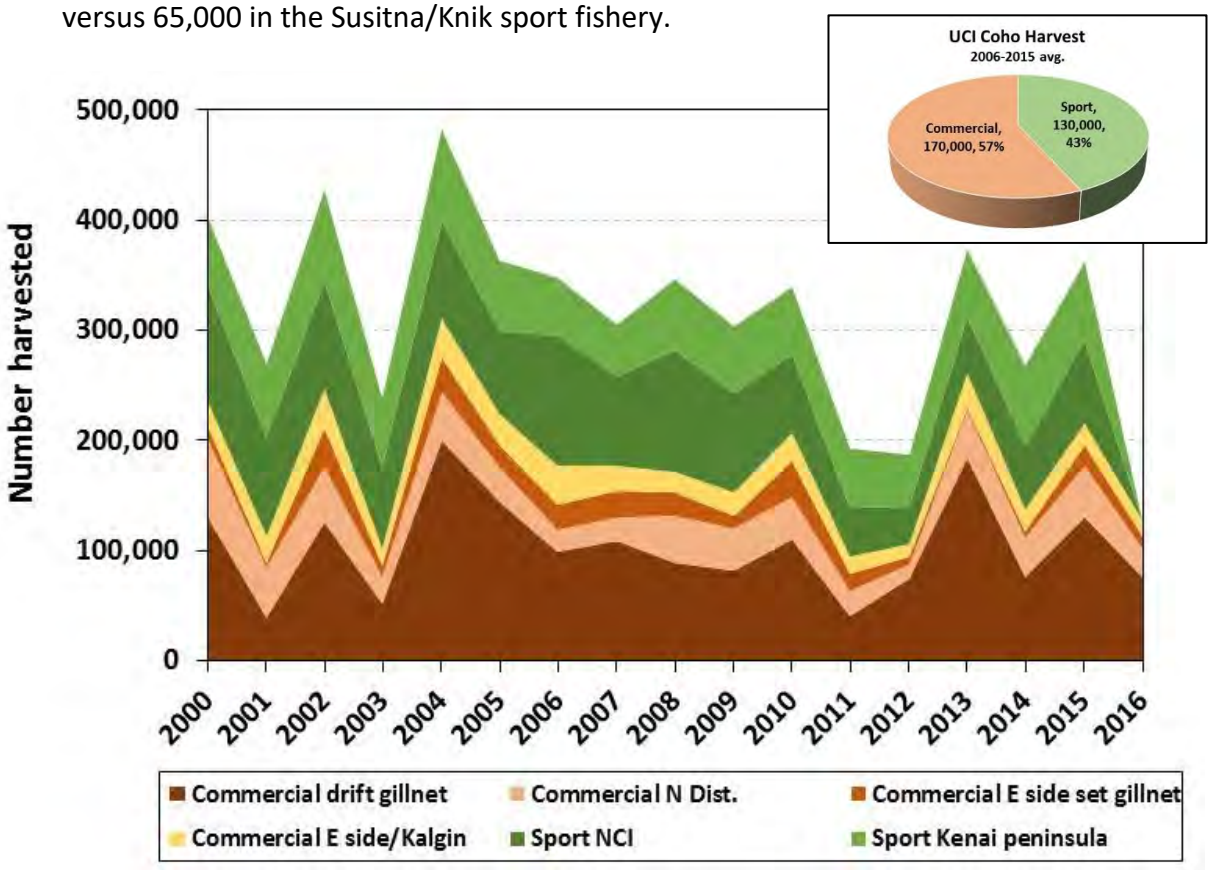


Figure 5. Annual harvest and harvest shares of coho in Upper Cook Inlet by fishery. (Sport harvest numbers for 2016 are not yet available.)

Abundance

- Coho Salmon return to practically every accessible stream in the region.
- Susitna drainages support the largest coho returns in Cook Inlet, with returns historically numbering several hundred thousand fish.
- Coho are counted in only a handful of the hundreds of Northern Cook Inlet streams to which they return. Numbers fluctuate widely but approached 20-year lows in 2011-2012 (Figure 6).
- Mark-recapture estimates by ADF&G for the Susitna River above river mile 30 and the Yentna rivers ranged from 158,700 to 216,900 in 2010-2014.

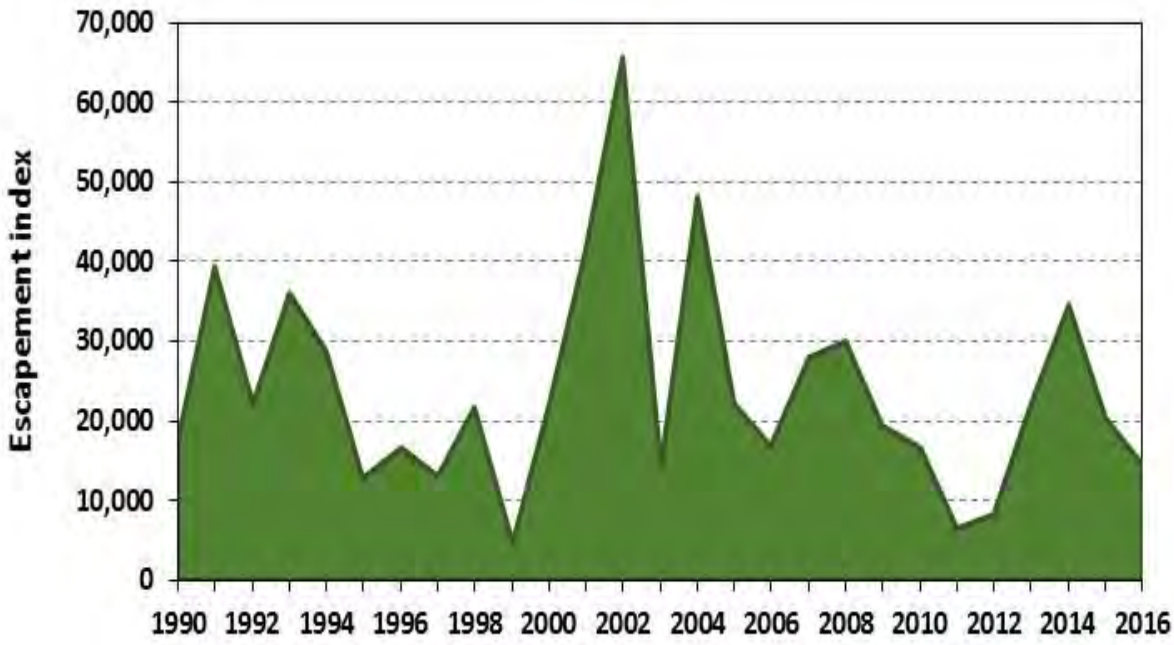


Figure 6. Escapement index for Northern Cook Inlet coho salmon (total of index counts from Little Susitna River, McRoberts Creek, and Fish Creek).

Escapement

- Coho consistently failed to meet escapement goals from 2010-2012.
- Escapement of Northern Cook Inlet coho is monitored relative to goals in three Knik arm streams (Little Susitna River, McRoberts Creek, and Fish Creek).
- There are presently no escapement goals for Susitna River drainage coho salmon.

Table 1. Goals and recent escapements of NCI coho. Escapements below goals are highlighted.

	Goal	2010	2011	2012	2013	2014	2015	2016
Little Susitna	10,100-17,700	**9,214**	**4,826**	**6,779**	13,583	24,200	12,421	**9,998**
McRoberts Cr.[a]	450-700	**242**	**229**	**213**	663	**122**	571	**106**
Fish Creek	1,200-4,400	7,034	1,428	1,237	7,593	10,283	7,370	4,483

[a] *McRoberts Creek is a tributary in Jim Creek drainage.*

Management

- Sport fisheries continue to be constrained by current low coho abundance.
- Bag limits throughout much of Northern Cook Inlet have been reduced from three to two coho per day.
- Regular bait restrictions also limit angler participation and harvest levels.
- In 2016 for instance, no bait use was allowed in the Little Susitna during the coho fishery. Bait use was limited to only eight days during the king salmon season (July 6 - 13). The Little Susitna River provides one of the Northern Management Area's most heavily used sport fisheries for both king salmon and coho salmon.

Myth: *Commercial fishery impacts on coho are insignificant.*

Fact: ***Commercial harvest patterns affect the success of all other fisheries operating in their shadow.***

Claims of low commercial exploitation rates on coho are based on subjective interpretations of limited data and ignore substantial evidence to the contrary. Commercial gillnet fisheries are extremely effective harvesters of UCI salmon including millions of sockeye per year and tens or hundreds of thousands of comingled coho. Commercial harvest is concentrated on the front end of the coho run which effectively delays delivery of significant coho numbers to freshwater sport fisheries by several weeks in spite of a long-standing sport fishery priority for this species. ADF&G consistently argues to maintain low bag and possession limits for sport fishermen. If there are not enough coho to support more liberal sport fishery limits, there are no surplus coho for additional commercial harvest.

SUSITNA SOCKEYE AT RISK

Continuing declines and chronic escapement failures of Susitna sockeye qualify this stock for yield, management and conservation concerns

Stock of Concern Designation

- Susitna sockeye salmon were designated as a Stock of Yield Concern in 2008.
- ADF&G recommended continuing the Stock of Concern designation at the 2016 Board Work Session.
- Management actions to date have failed to stabilize or rebuild this stock.
- Similar trends have resulted in listing of many lower 48 salmon stocks under the U.S. Endangered Species Act.

Declining Abundance & Harvest (Yield)

- Average returns and harvest have fallen by over half during the last 30 years.
- This decline has occurred during a period of historically high abundance of sockeye stocks throughout Alaska.

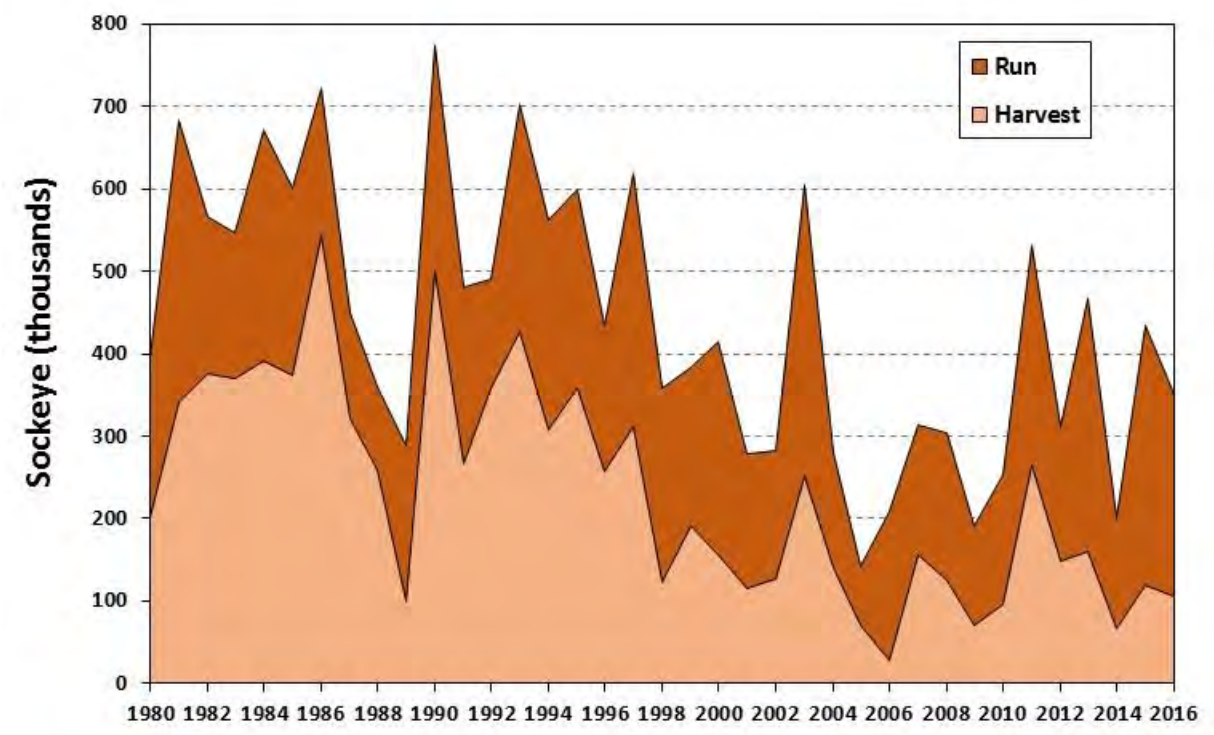


Figure 7. Historical Susitna sockeye run to Upper Cook Inlet (Tobias & Willette 2013; Shields & Dupuis 2016).

Failing Escapements

- Sockeye consistently fail to achieve escapement goals established for four Northern Cook Inlet populations (Table 2).
- The three Susitna sockeye goals (Chelatna, Judd, Larsen) have all been met just once since they were established in 2009.
- Susitna sockeye have a long history of falling short of established goals. Prior to 2009, escapement fell short of Yentna Sonar goals in five of the previous nine years of monitoring.
- Escapement goals have been periodically reduced or replaced as Susitna sockeye continue to decline. Goal reductions are again proposed for 2016 in the current escapement goal review (Table 2).
- Escapement goals are not defined for Shell Lake sockeye but the drastic decline of this population provide an obvious justification for a stock of conservation concern designation.

Table 2. Goals and escapements for Northern Cook Inlet sockeye. Escapements less than goals are highlighted.

Year	Chelatna	Judd	Larsen	Fish	Shell
Goals	***20,000-65,000*** [a]	***25,000-55,000*** [a]	***15,000-50,000*** [a]	***20,000-70,000*** [b]	***No goal***
2006	18,433	40,633	57,411	32,566	69,720
2007	41,290	58,134	47,736	27,948	26,784
2008	73,469	54,304	35,040	**19,339**	2,624
2009	**17,865**	43,153	41,929	83,477	4,968
2010	37,784	**18,361**	20,324	126,829	2,223
2011	70,353	39,997	**12,413**	66,678	937
2012	36,577	**18,303**	16,708	**18,813**	No data
2013	70,555	**14,021**	21,810	**18,912**	133
2014	26,212	**22,416**	**12,040**	43,915	No data
2015	69,897	47,934	23,185	102,012	
2016	60,785	No count[c]	**14,187**	46,202	
Goals (2017)	***20,000-45,000***	***15,000-40,000***	***15,000-35,000***	***15,000-45,000***	***No goal***
Pike	*Yes*	*No*[d]	*No*	*Yes*	*Yes*

[a] *Established in 2009.*

[b] *Established in 2002.*

[c] *Not counted due to lack of funds.*

[d] *Judd Lake is not identified on ADF&G's list of waters with invasive pike. Cook Inlet Aquaculture Association has conducted fish enumeration studies in Judd Lake and has neither observed pike or received first-hand accounts of their occurrence in Judd Lake (Gary Fandrei, CIAA, personal communication on 1/30/17).*

Production Issues

- Susitna sockeye are tremendously diverse and include over 30 populations that spawn and rear in lakes, rivers, and sloughs throughout the system.
- Many of these systems are inherently far less productive for sockeye than the large lake systems of the Kenai and Kasilof rivers.
- There is little doubt that freshwater productivity of Susitna sockeye has declined. Invasive pike have apparently impacted salmon numbers in many lower elevation waters. Climate change, upstream fish passage, beavers and disease may also be factors.

Myth: Pike & Beavers Excuse the Need for Commercial Fishery Limits

Fact: Freshwater production problems are an imperative for limiting harvest, not an excuse for continued overfishing.

Uncomfortable with recent changes to fishing regulations, some leaders of the commercial drift fleet heap blame on Mat-Su habitat as the main cause for the area's weak salmon returns. This criticism is contrary to modern principles of sustainable salmon fishery management.

The combination of reduced freshwater productivity and significant fishery exploitation is a recipe for salmon stock extinction. Commercial fisheries cannot be held harmless for habitat issues where limits are needed to sustain the salmon resource. Production concerns for Northern Cook Inlet salmon including sockeye will require reductions in historical levels of exploitation in order to avoid long-term conservation problems.

The myth here is that participants in UCI commercial fisheries have nothing to do with the challenges facing fish habitat even though many of these people live in the region and enjoy the roads, utilities and other modern developments. Cook Inlet is the most highly populated and urbanized region of the State. Development provides homes and jobs but inevitably affects fish habitat in areas where people concentrate. While impacts of development can be and are being mediated, does anyone really think that twenty years from now we will have fewer cities, towns, roads, subdivisions, schools and shopping malls or that 50 years of pike invasion can be cost-effectively reversed in hundreds of miles of streams?

The question is not whether factors like culverts, beavers, and pike impact salmon but rather what habitat and fishery strategies are necessary to sustain salmon populations and fisheries in the face of these pressures. Substantial habitat protection and restoration initiatives have been undertaken by the Matanuska-Susitna Borough and partners. If the fish truly come first and maximizing total harvest is secondary, then precautionary fishery management strategies for impaired stocks such as Susitna sockeye must also be part of the solution.

Commercial Overexploitation

- Freshwater production issues for Susitna sockeye are compounded by continuing high rates of exploitation in Central District commercial fisheries.
- Current exploitation rates average about 40% and may be even higher in large Kenai sockeye return years. Historical rates often reached 60-70% which was nearly twice what Susitna sockeye could sustain.
- High fishing rates continue to be rationalized by: 1) the high costs of reduced fishing in terms of foregone harvest of the more abundant and productive Kenai and Kasilof sockeye, and 2) little commercial yield benefit of increased Susitna sockeye escapement due to low productivity.
- While ADF&G has failed to develop criteria for identifying conservation stocks of concern under the Sustainable Salmon Policy, several populations of Susitna sockeye are very obviously in conservation crisis (Table 2).
- The combined impact of freshwater production issues and continuing harvest levels impose a significant conservation concern for marginal Susitna sockeye populations that do not have escapement goals.

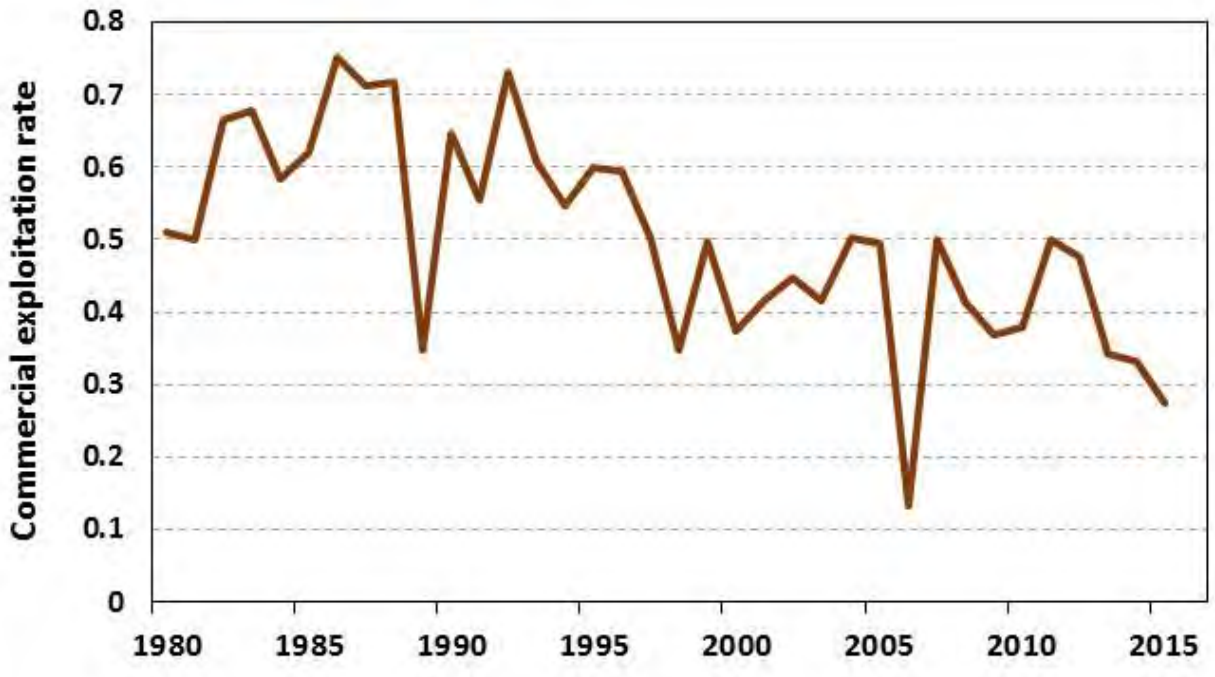


Figure 8. Annual exploitation rates of Susitna sockeye in UCI commercial fisheries based on run reconstructions (Tobias & Willette 2013; Shields & Dupuis 2016).

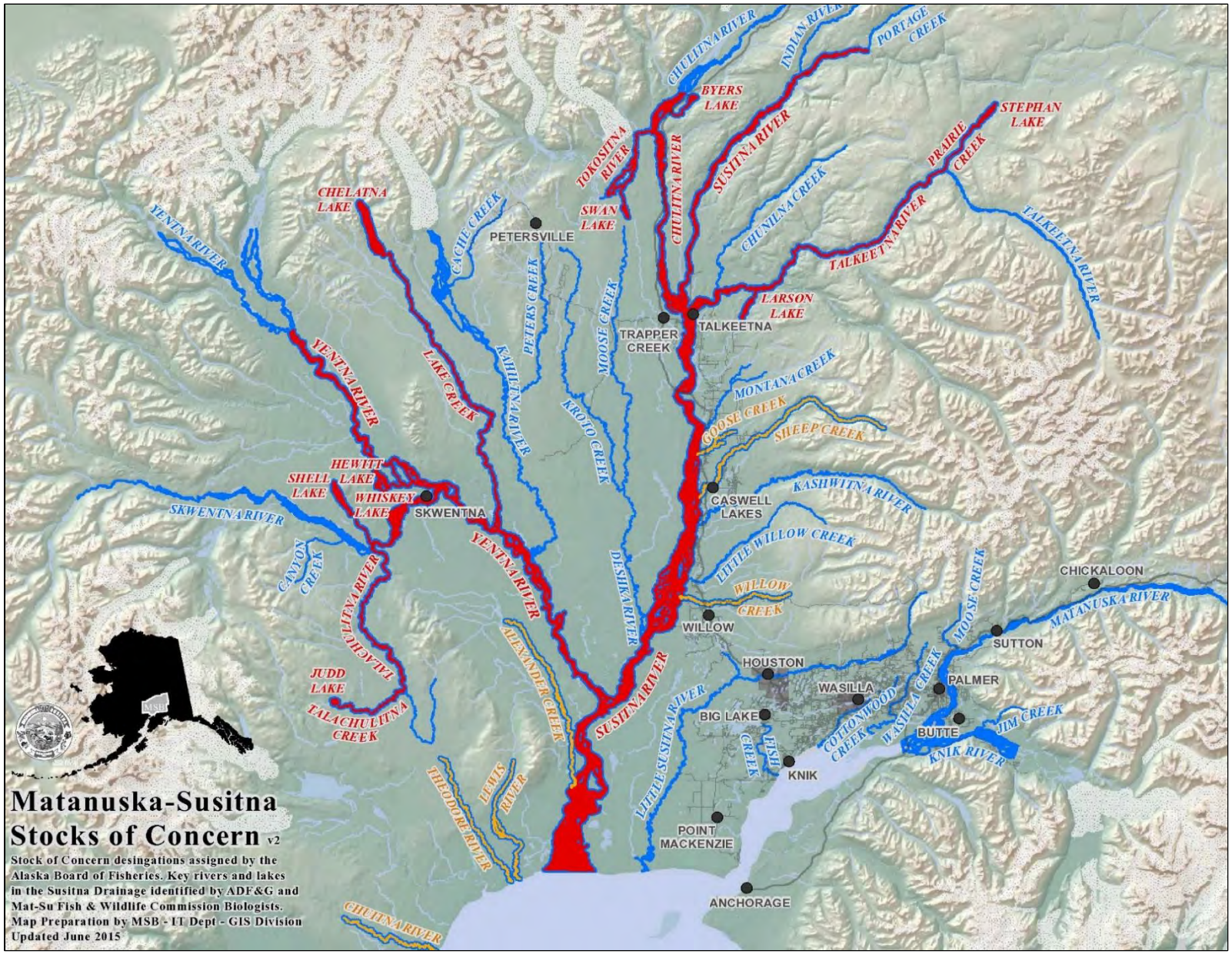


Figure 9. Distribution of stocks of concern in Northern Cook Inlet. Sockeye are designated by red. Kings are designated by yellow.

UCI COMMERCIAL FISHERY VALUES

Rumors of commercial fishery demise are greatly exaggerated

UCI commercial fisheries continue to enjoy great success, driven by consistently strong returns of Kenai and Kasilof sockeye. These valuable and lucrative fisheries harvest an average 3 million sockeye per year and many thousands of intermingled coho and kings (Figure 10).

- Implementation of the conservation corridor has clearly not reduced the success of the Central District commercial fishery when measured in ex-vessel value of the catch (Figure 11).
- Ex-vessel values of the UCI salmon harvest since 2011 when the regulation was first adopted, were more than double the 20-year average.
- The drift gillnet fishery produced some of the highest values in the last 20 years while fishing in expanded terminal fishing areas in recent years where the east side set gillnet fishery was restricted to protect poor king runs.

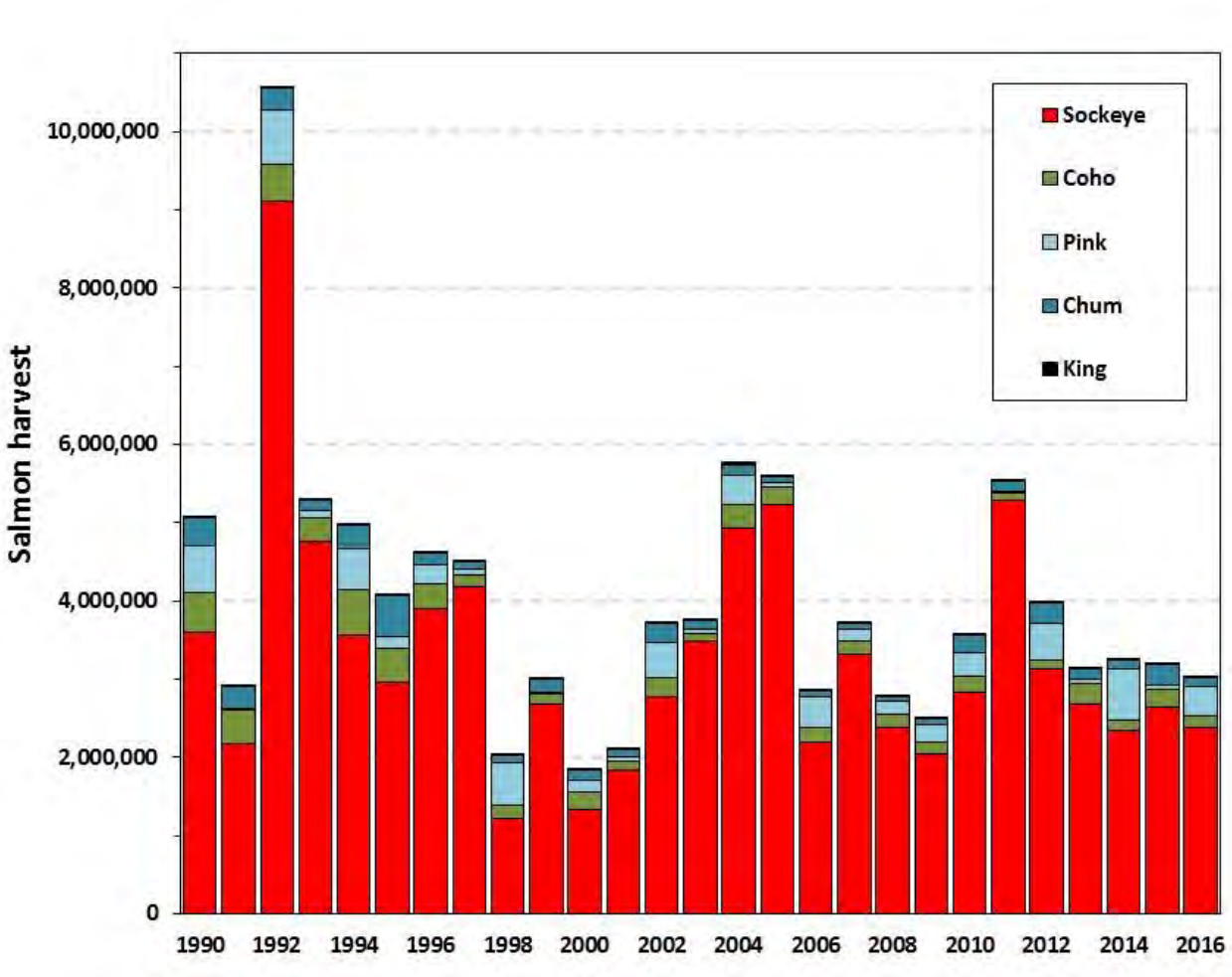


Figure 10. Annual harvest of salmon in UCI commercial fisheries.

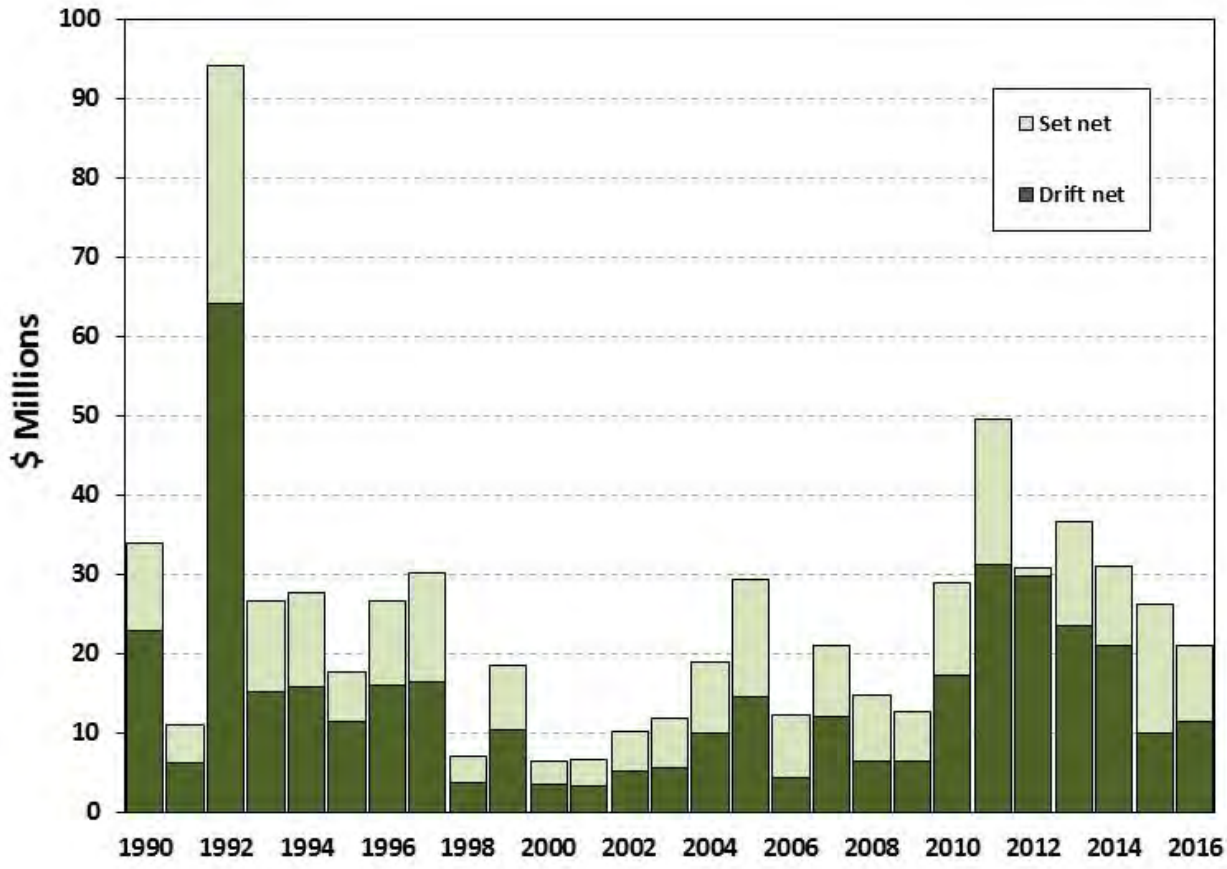


Figure 11. Annual ex-vessel value of UCI commercial sockeye salmon fishery harvest (data from Shields and Dupuis 2016).

Myth: Maximizing UCI commercial harvest maximizes salmon economic value.

Fact: The essential economic question in Cook Inlet is not which fishery is more valuable but rather how to optimize the combined value of commercial, sport, personal use, and subsistence fisheries.

Successful sport, personal use, subsistence and commercial fisheries are all vital to the economic and social well-being of people throughout Upper Cook Inlet (UCI). The economic value of the commercial salmon fishery has long been recognized but equivalent or greater values of sport and personal fisheries in Cook Inlet have only recently been realized. The needs and values of no single user group are preeminent. An honest discussion of UCI fisheries issues must recognize the perspectives, needs, and values of each of the competing fishery interests. Each fishery deserves a reasonable opportunity and a fair share of the common property salmon resource.

THE MIXED STOCK FISHERY PROBLEM

Large numbers of northern-bound salmon are harvested in Cook Inlet by a mixed species and stock commercial gillnet fishery managed primarily for Kenai and Kasilof sockeye

The single most important human factor impacting Northern Cook Inlet salmon returns is interception in intensive gillnet fisheries for mixed species and stocks in marine waters of Upper Cook Inlet.

Without question, the management of Upper Cook Inlet salmon is complicated by the great differences in the biological productivity of the various species and stocks and their overlapping run timing. Kenai sockeye are highly productive and can be harvested heavily, but many north- migrating salmon cannot withstand similar harvest pressure. Maximizing the benefit from a strong stock can come at a cost to others, as has happened all too often for Mat-Su salmon.

The problem with mixed stock fisheries targeting strong stocks is that they overfish less productive stocks included in the mix. The less productive stocks in the mix simply cannot sustain the same high harvest rates as the more productive stocks. That is why Alaska primarily manages its salmon fisheries in terminal harvest areas rather than mixed stock areas.

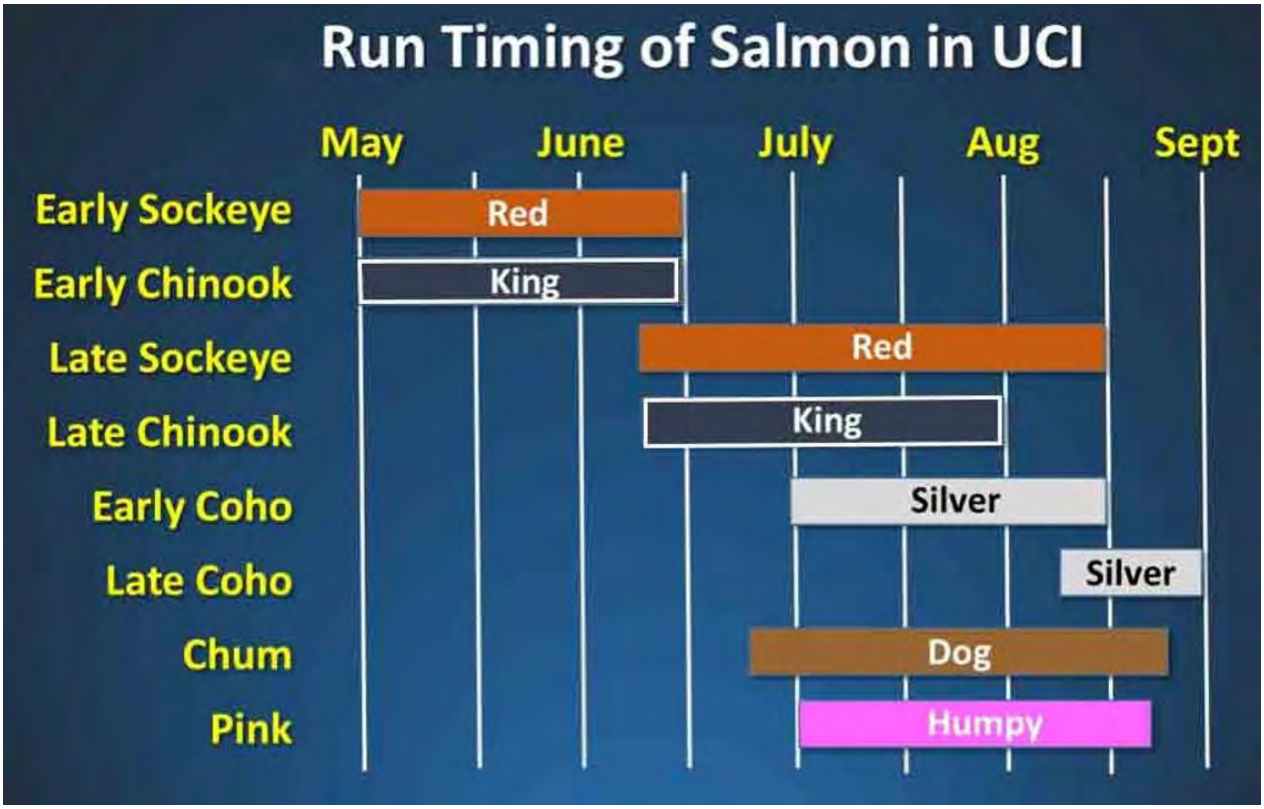


Figure 12. Run timing of major salmon stocks in Upper Cook Inlet.

Kenai sockeye come from large lakes which are among the most productive sockeye habitats on the planet.

- Kenai and Kasilof sockeye return 4.5 fish per spawner on average.
- This means that nine sockeye are produced for every two spawners, and stocks can sustain themselves at annual harvest rates of 70% (Figure 13).
- In fact, Kenai sockeye are among the most heavily exploited sockeye stocks in the world.

Susitna sockeye originate in a variety of smaller lakes, rivers and sloughs, which are inherently much less productive.

- Susitna sockeye return less than 1.5 fish per spawner which means that they are overfished at much lower rates than Kenai sockeye can support.
- Therefore, if only three Susitna sockeye salmon are produced per spawning pair only one Susitna sockeye offspring (compared to seven Kenai sockeye offspring) may be harvested if the stock is to sustain itself over time.
- Productivity has been reduced in freshwater by factors including predation by non-native pike.

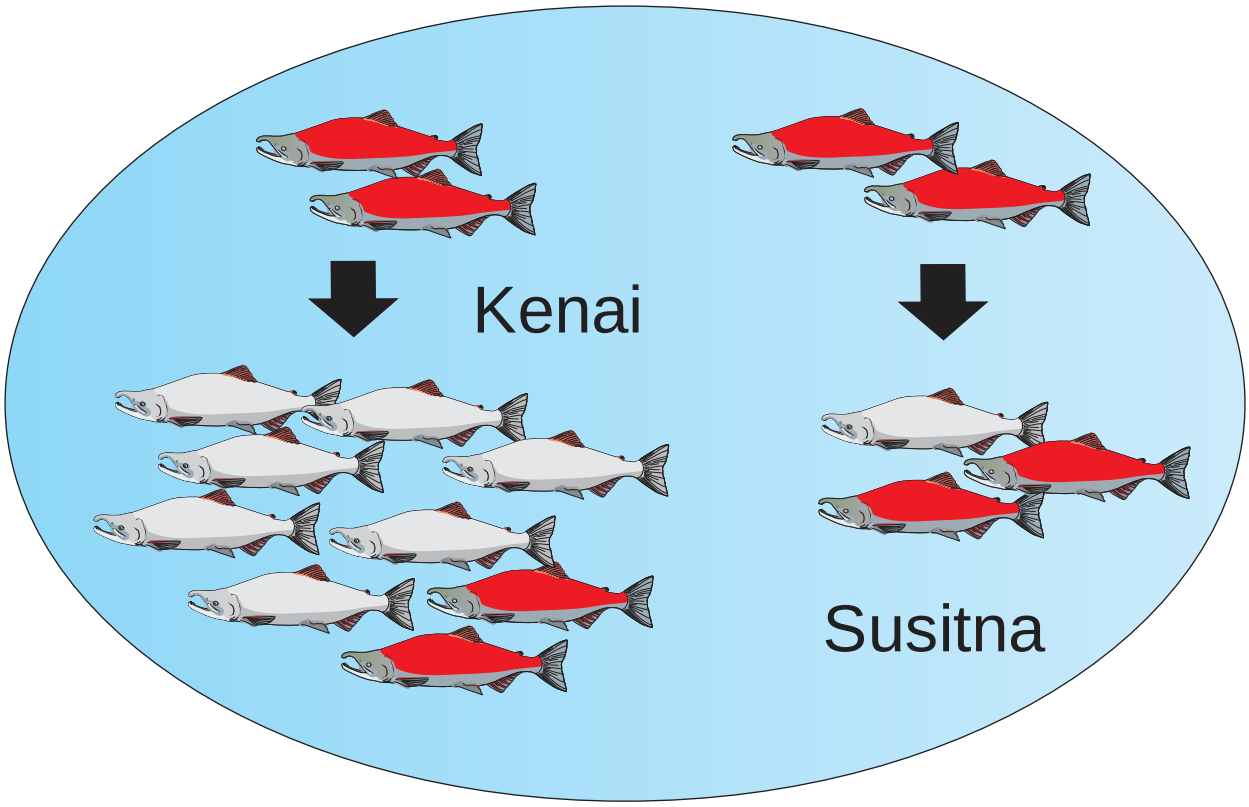
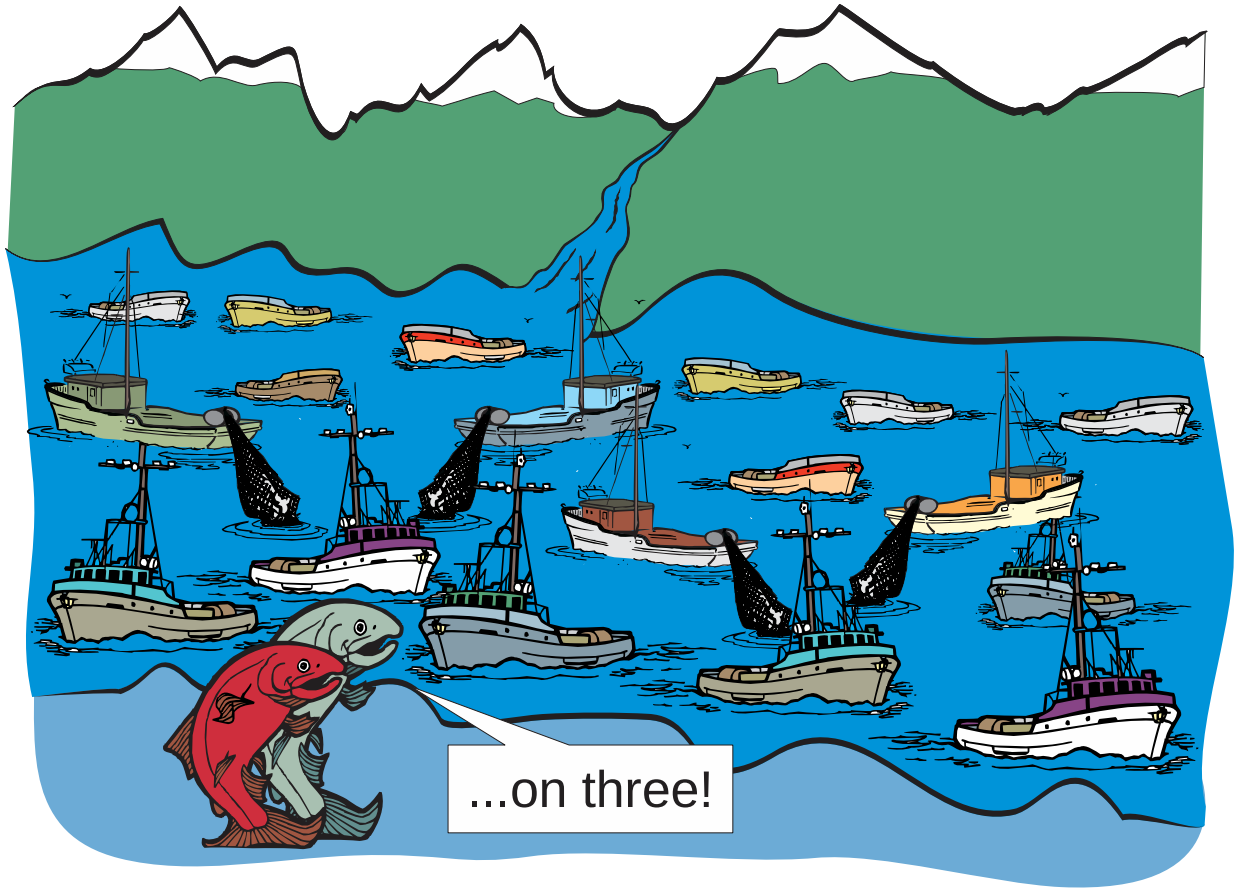


Figure 13. Return per spawner of Kenai and Susitna sockeye. Harvestable surplus is identified as silver and replacement spawner fish are red.

ADF&G has historically failed to implement effective management tools and authority to protect northern stocks of sockeye and coho from the Central District mixed stock commercial fishery. Too few northern inlet salmon historically made it through the Central District commercial fishery to consistently achieve spawning escapement goals or support upstream subsistence, sport, guided sport, commercial, or personal use fisheries.

Thus, the Central District commercial fishery is overfishing Susitna sockeye beyond their capacity to sustain maximum yields. Current fishing rates, in combination with freshwater production issues, have likely reduced some Susitna sockeye populations to the point of a severe conservation concern. The commercial fishery is also overfishing coho well beyond its fair share relative to the long-established sport fishery priority for this species.

Management of the Inlet's weak and strong stock "mix" often results in substantial conflict among user groups. When commercial fishermen have a banner year for sockeye, sport fishermen often face closures because of few returning coho. By studying when and where specific stocks and species are located in the inlet, hotly-contested harvest practices can hopefully be fine-tuned to benefit all users of this common property resource.



Myth: Limited Entry & Traditional Management Strategies are All We Need for Effective UCI Fishery Management

Fact: There is far more commercial fishing gear in the marine waters of UCI each summer than is needed to effectively harvest the available surplus of salmon. In the long-term, commercial fisheries can prosper but management must evolve toward fishing more selectively.

Limited entry, the state statute that placed a maximum number on participants in commercial fisheries by gear type and region, does nothing to limit the harvest potential of the commercial salmon fisheries of UCI. The commercial salmon fishery in UCI is substantially overcapitalized and a reduction in gear could be beneficial but a rationalization or buyout strategy does not seem to be impending. On average, only about 65% of the gill net permits are fished during any given season. The others are considered to be "latent." There is no room for additional set net gear along the shores of the Kenai Peninsula.

The historical tools used to manage UCI gill net fisheries have limited utility when used in the traditional manner for one simple reason. They lack effective selectivity between stocks and species. New tools are necessary to meet evolving demands of these complex mixed species, stock and user fisheries for the benefit of all involved. Recent innovations including closure windows and shallow nets for the set net fisheries, and terminal harvest strategies and conservation corridors for the drift gill net fishery, are just a few of the potentially effective management tools that may be employed to optimize harvests.

The market price of fresh, high quality, wild Alaska salmon and the demand for this outstanding product is high. UCI commercial fisheries will continue to prosper even when providing plenty of kings and coho for successful sport fisheries and sockeye for personal use. The magnitude of expected loss resulting from reconfiguration of gillnet fisheries in the manner selected by the Board of Fisheries in 2014 is no more than 5-10% of the year's total ex-vessel value. In contrast, the normal annual variation in ex-vessel value which has ranged from less than $8 million to more than $53 million over the past 25 years.

The commercial ex-vessel value foregone to manage more selectively is small relative to annual variations in sockeye harvest and price per pound paid to the fisherman. The forgone value is far less than the economic contribution of a successful sport fishery.

Cook Inlet salmon are a tremendous, renewable, natural resource with the capacity to support vibrant sport, personal use, commercial and subsistence fisheries. However, the days of strong stock, single industry salmon fisheries in UCI are past. It is time to shape the successful fisheries of the future. The ability to innovate and adapt will be key to future fishery success.

CENTRAL DISTRICT DRIFT GILLNET MANAGEMENT PLAN

"The purpose this management plan is to ensure adequate escapement of salmon into the Northern District Drainages." [5 AAC 21.353]

The drift gillnet fishery of the central district is the most powerful and mobile of all commercial fisheries in UCI. The fishing power of the commercial fleet is tremendous. The drift fleet has demonstrated an ability to harvest more than half a million salmon in a single day during the peak of a strong run. The drift gillnet fleet is the primary harvester of north-bound salmon. Commercial interception of northern inlet sockeye and coho dwarfs harvest of these stocks in upstream sport fisheries.

The drift gillnet management plan includes a suite of actions that acknowledge the need to pass northern salmon and harvest Kenai sockeye.

Timeframes

July 9-15: primarily for passage of Susitna sockeye with northern coho as a secondary objective.

July 16-31: primarily for passage of northern coho with Susitna sockeye as a secondary objective.

August 1 to close: the primary objective is to protect coho after the 1% rule signals the conclusion of significant drift gillnet sockeye harvest.

Kenai Sockeye Run Strength Triggers

Less than 2.3 million Kenai sockeye: Maximum passage of northern salmon.

2.3 to 4.6 million Kenai sockeye: Moderate passage of northern salmon.

More than 4.6 million Kenai sockeye: Minimum passage of northern salmon.

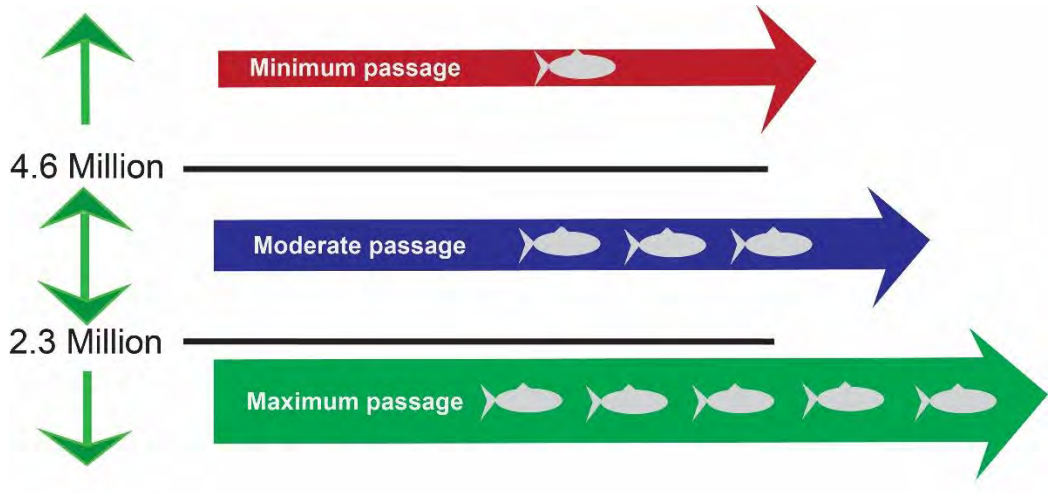


Figure 14. Relative effects of Kenai sockeye run strength triggers in the drift gillnet fishery management plan on passage of salmon into northern Cook Inlet waters.

Drift Gillnet Harvest Areas

District-wide: Employed to maximize drift harvest of Kenai and Kasilof sockeye salmon but can over harvest less productive northern sockeye and coho at the same time.

South of Kalgin Island (Area 1): Allows drift harvest of Kenai and Kasilof sockeye, while still allowing northern-bound sockeye and coho salmon the opportunity to migrate through the Area 2.

Kenai & Kasilof Sections: Narrow bands outside the eastside set gillnet fishery historically used to target local returns. Use is generally infrequent and catches typically low.

Expanded Kenai & Kasilof Sections: Terminal harvest areas designed to focus harvest on Kenai and Kasilof while providing a conservation corridor through the Central Inlet for passage northward of Susitna sockeye and northern inlet coho.

Anchor Point Section: Adopted by the 2014 BOF to allow fishery opportunity to Homer-based fishers during some periods when the conservation corridor is in place.

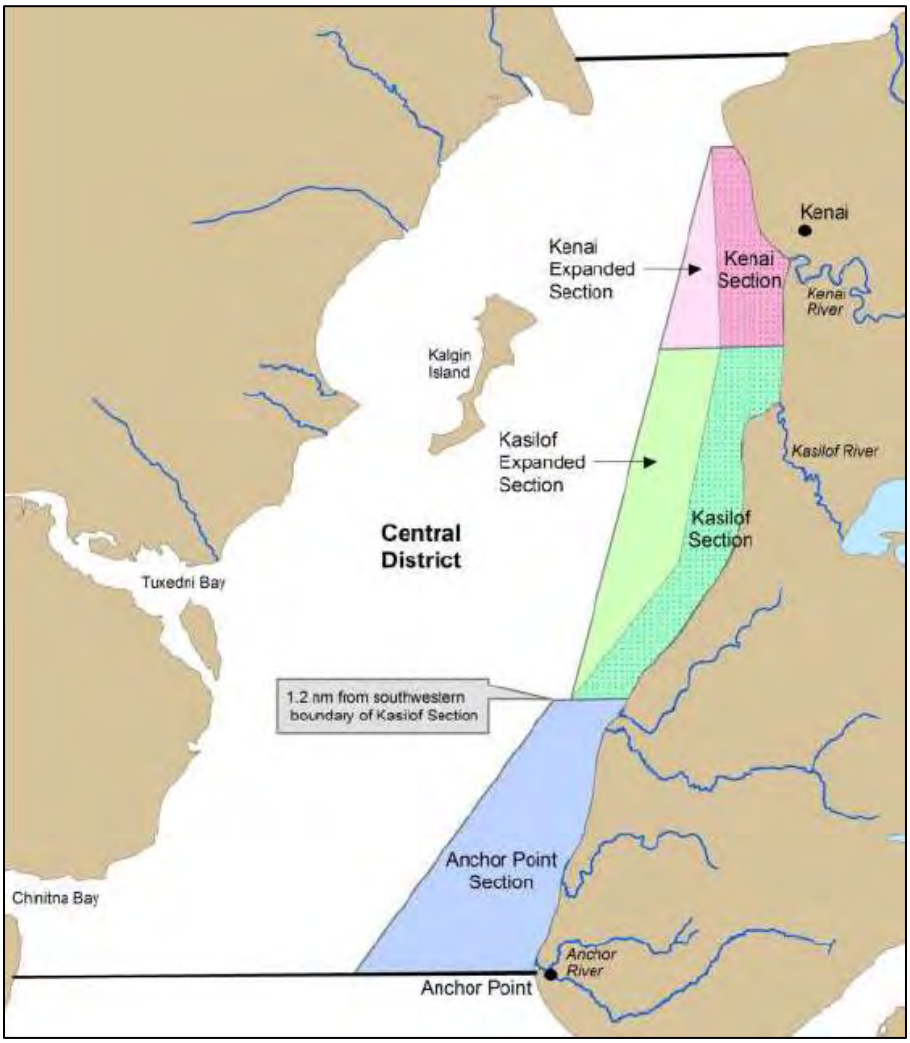


Figure 15. Map of drift gillnet fishery terminal harvest areas, including the Kenai and Kasilof sections, Expanded Kenai and Expanded Kasilof sections, and the Anchor Point Section (ADF&G Figure).

Table 3. Summary of key time and area provisions of the Central District Drift Gillnet Management Plan.

<table>
<tr><th>Dates</th><th>Kenai sockeye</th><th>District wide</th><th>Area 1</th><th>Expanded Kenai & Kasilof sections</th><th>Anchor Point section</th><th>Areas 3&4</th></tr>
<tr><td>Jun 19 [a] – Jul 8</td><td>--</td><td>2 reg. periods / week</td><td colspan="4"></td></tr>
<tr><td rowspan="2">July 9–15</td><td rowspan="2">--</td><td rowspan="2"></td><td colspan="2">2 reg. periods / wk</td><td rowspan="2"></td></tr>
<tr><td>Additional time allowed</td></tr>
<tr><td>>2.3 mil</td><td></td><td colspan="2">1 additional 12-hr period</td><td></td></tr>
<tr><td rowspan="4">July 16–31</td><td>< 2.3 mil</td><td colspan="2"></td><td>All periods</td><td></td></tr>
<tr><td rowspan="2">2.3-4.6 mil</td><td rowspan="2"></td><td colspan="2">1 reg. period / wk</td><td rowspan="2"></td></tr>
<tr><td>1 period / wk</td></tr>
<tr><td>> 4.6 mil</td><td>1 reg. period / wk</td><td colspan="2">1 reg. period / wk</td><td></td></tr>
<tr><td>(all)</td><td colspan="2"></td><td>Additional time allowed</td><td></td></tr>
<tr><td>August 1–15</td><td>--</td><td>2 reg. periods / wk [b]</td><td colspan="3"></td><td>Periods following 1% closure</td></tr>
<tr><td>After Aug 16</td><td>--</td><td colspan="4"></td><td>Until closed by EO</td></tr>
</table>

[a] *3rd Monday in June or June 19, whichever is later.*

[b] *Closure triggered by 2 consecutive fishing periods of less than 1% of the seasons' total sockeye catch taken per period.*

Myth: UCI Management Violates the Magnuson-Stevens Act (MSA)

Fact: Claims of inconsistency are an effort to end run the state BOF process for a federal process that has historically been heavily weighted toward commercial fisheries and far less accessible to the public.

The Magnuson–Stevens Fishery Conservation and Management Act is the primary law governing marine fisheries management in United States federal waters. Management of salmon in the Upper Cook Inlet is very obviously consistent with the national standards of the MSA involving management for optimum yield and use of the best available science. The North Pacific Fishery Management Council historically referred management of Alaska salmon to the State with good reason.

Alaska's world-best salmon fisheries are a testament to the effectiveness of the current Board of Fishery process. Attacks on this process are nothing more than a cynical attempt to return to bygone days when a Board, dominated by commercial interests, allocated the vast majority share of the UCI salmon harvest to commercial fisheries.

THE CORRIDOR – SAFE PASSAGE HOME

The data show clear benefits of the conservation corridor for northern-bound salmon with little or no impact on commercial fishery value

The "conservation corridor" regulation is designed to increase passage of northern-bound salmon through the mixed stock commercial fishery. The Drift Gillnet Fishery Management Plan restricts some fishing periods to terminal harvest zones in order to focus the harvest on abundant and valuable Kenai and Kasilof sockeye stocks. Terminal harvest zones are referred to as the Expanded Kenai, Kasilof and Anchor Point Sections.

These new regulations required drifters to fish more often in coastal waters closer to the Kenai and Kasilof rivers. When commercial fishermen pursue sockeye closer to their "home" drainages, the offshore salmon migrating north, like coho, have a better chance of reaching their spawning grounds. Targeting sockeye in more discrete near-shore harvest zones is also how Bristol Bay, the world's most famous salmon fishery has been managed for decades. The conservation corridor seeks to emulate that successful model in upper Cook Inlet.

- The conservation corridor was adopted by the 2011 Board and revised in 2014 by unanimous 7-0 vote. Six years of data are available on corridor effectiveness.
- 2014 was the first time in several years that regulations significantly enforced the longstanding intent of the management plan by providing a meaningful conservation corridor for coho and other salmon to swim north.
- Since the corridor was adopted, the drift net fishery has enjoyed some of its most successful seasons in the last 20 years (Figure 11).
- The Expanded Kenai and Kasilof Sections have proven successful for harvesting sockeye. Substantial numbers have been harvested in the terminal harvest zones in every year (Figure 18).
- The corridor restriction has reduced commercial harvest of coho, consistent with a long-standing sport-fishery priority for this species.
- Total exploitation rates on Susitna sockeye by the commercial fishery have been significantly reduced since current conservation corridor adopted in 2014 (Figure 8).[1]
- Sockeye catch per delivery is reduced in the terminal harvest zone relative to wider openings. Therefore, more fishing time in terminal harvest zones is needed to make up the difference.

[1] *Genetic studies do not appear to show a difference in sockeye stock composition inside and outside the expanded terminal harvest area, but the statistical power to identify differences from the offshore test fishery is limited by small samples sizes. Fishery openers are not designed for the purpose of testing for stock differences.*

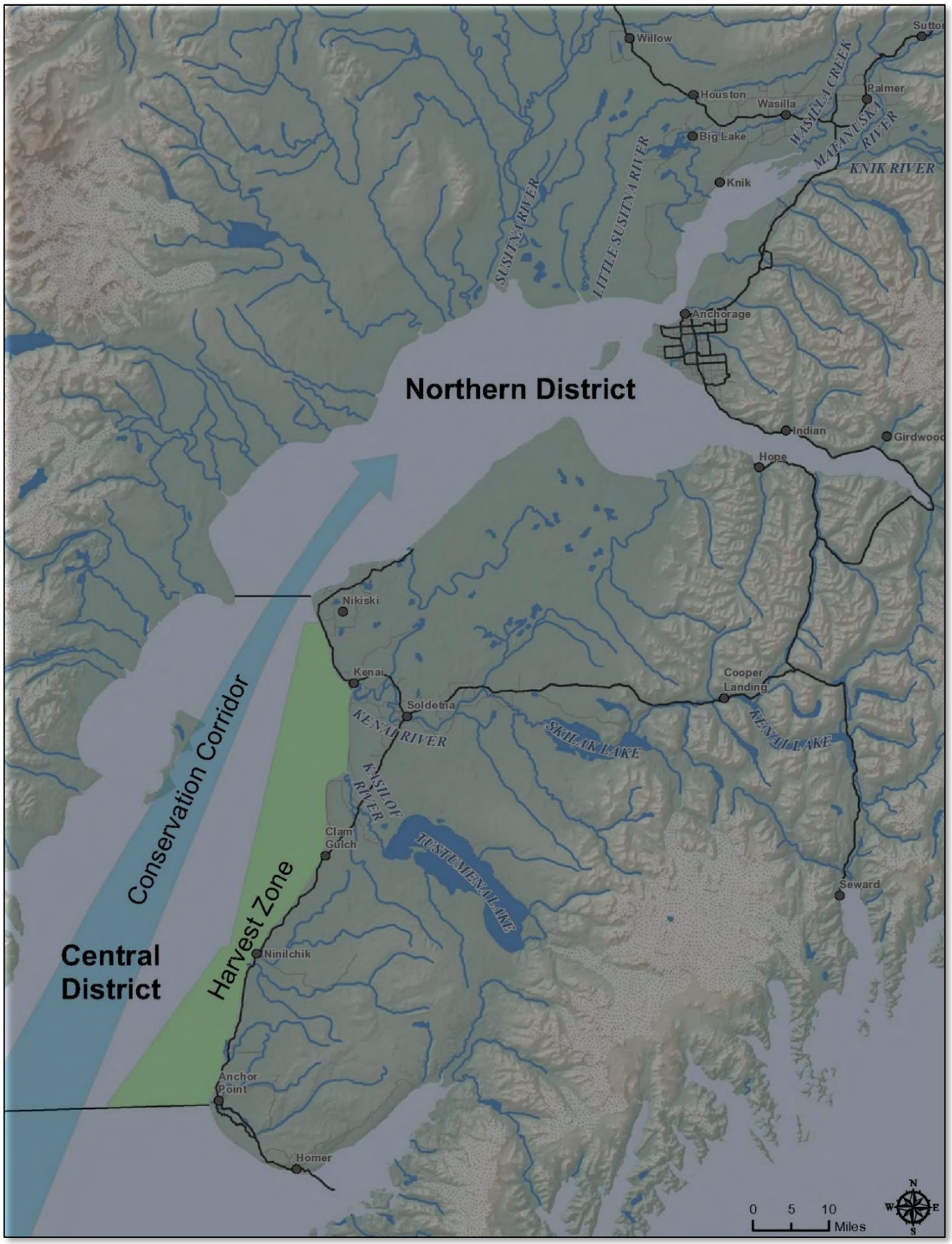


Figure 16. Location of conservation corridor and expanded terminal harvest zone in the Central District commercial drift gillnet fishery.

Coho Benefits

- The conservation corridor has proven very effective for reducing coho harvest in the commercial drift gillnet fishery.
- Coho catch per delivery is very low in the expanded drift terminal harvest area relative to more-district-wide openers. Sockeye to coho catch ratios in the expanded terminal harvest area are almost double those seen in district-wide openers during the last three weeks of July.
- As a result, many more sockeye can be caught per incidental coho taken in the expanded Kenai and Kasilof sections than in more district-wide openers.
- Substantial improvements in coho returns to northern inlet streams followed refinements in the conservation corridor regulation by the 2014 Board of Fisheries.

Table 4. Central District commercial drift gill net fishery harvest of coho by fishing area (season totals).

Year	Districtwide[a]	Kasilof section	Kasilof terminal	Expanded Kenai/Kasilof	
	Number	Number	Number	Number	% of total
2011	33,201	8	0	7,170	17%
2012	66,884	0	0	7,002	9%
2013	170,480	27	49	11,320	6%
2014	60,821	13	22	13,698	18%
2015	96,803	13	311	28,019	22%
2016[b]	59,000	4	na	18,000	23%

[a] *Includes district wide and combined districtwide/expanded section openers.*

[b] *Numbers for 2016 are approximate.*

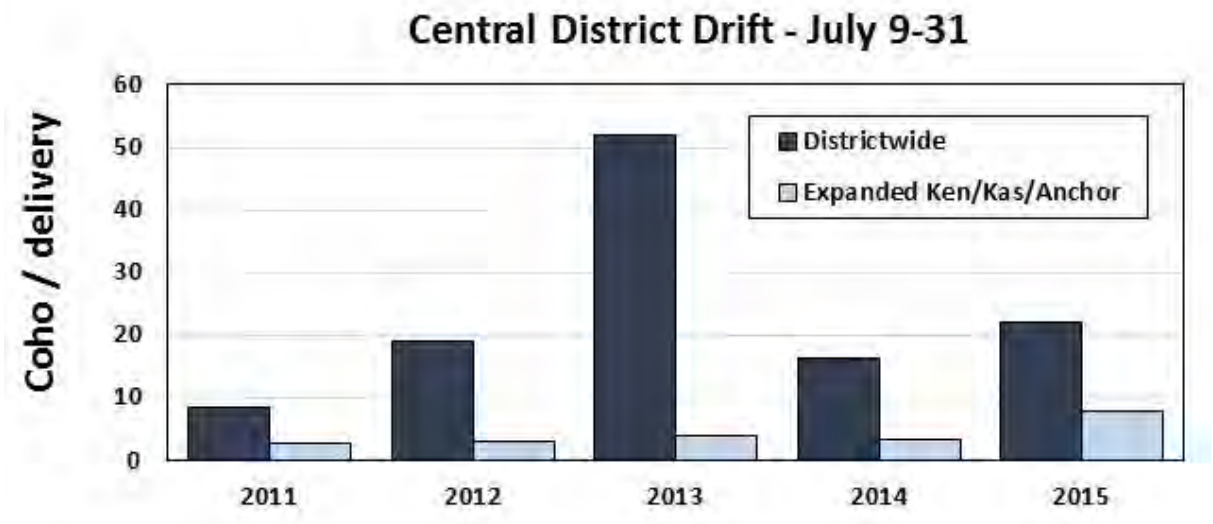


Figure 17. Effects of drift gillnet fishery area on coho harvest per delivery following adoption of conservation corridor regulations.

Sockeye Tradeoffs

- Six years of data clearly demonstrates that large numbers of sockeye can be caught in the Expanded Kenai and Kasilof Sections where fishing is focused while the conservation corridor protects northern-bound sockeye and coho moving up the center of the inlet.
- However, the commercial fishery typically has to work a little harder to catch their sockeye – sockeye catch per delivery is less in the terminal harvest areas than in larger areas of the district.
- The difference can be made up with more frequent openers of the Expanded Kenai and Kasilof Sections.
- However, commercial fishery managers have historically been reticent to decouple drift gillnet and set gillnet openers due to allocation objections by the commercial setnet fishery.

Table 5. Central District commercial drift gill net fishery harvest of sockeye by fishing area (season totals).

Year	Districtwide [a]	Kasilof section	Kasilof terminal	Expanded Kenai/Kasilof	
	Number	Number	Number	Number	% of total
2011	2,262,108	8,808	0	930,119	29%
2012	2,337,161	176	0	586,803	25%
2013	1,313,908	12,634	2,995	333,012	20%
2014	1,041,994	6,806	11,676	440,196	29%
2015	522,762	1,768	28,387	458,772	45%
2016[b]	725,000	2,900	na	538,000	42%

[a] *Includes district wide and combined districtwide/expanded section openers.*

[b] *Numbers for 2016 are approximate.*

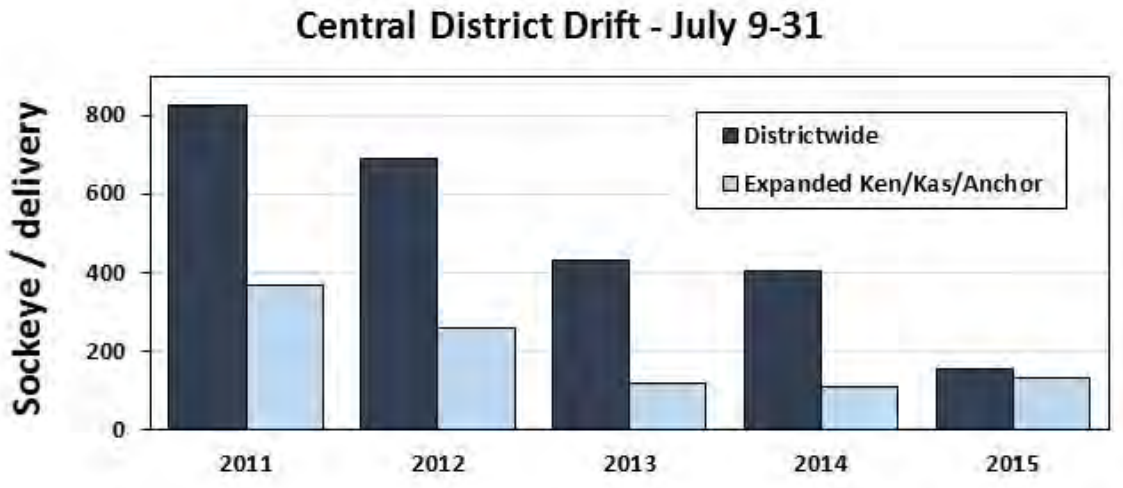


Figure 18. Effects of drift gillnet fishery area on sockeye harvest per delivery following adoption of conservation corridor regulations.

KINGS STILL A CONCERN

Improving Susitna numbers will provide us with the opportunity to consider the shape of future fisheries in the face of growing demand

Stocks of Concern

- King salmon return to large rivers and streams throughout Northern Cook Inlet.
- Escapement is monitored in 24 systems of which 17 have established escapement goals.
- Six populations were designated in 2011 as stocks of management (Alexander, Goose, Chuitna, Theodore and Lewis Rivers) or yield (Willow) concern (Figure 20).
- A seventh, Sheep Creek was designated as a stock of management concern in 2014.
- All Susitna River tributaries upstream from the Deshka River meet qualifications for stocks of yield concern but have not been designated. (No harvest has occurred in these stream for the last four years. Fishery closures are expected to continue in 2017.)
- ADF&G recommended no changes to king salmon Stocks of Concern in the 2016 BOF work session.

Abundance & Escapement

- Susitna basin streams support the largest king run in Cook Inlet and the fourth largest in the state – total returns exceed 100,000 in good years.
- Stock of Concern designations were precipitated by extremely poor escapement from 2008 through 2013.
- Small increases in 2015 and 2016 hold hope for continued improvement in abundance and escapement.
- It remains to be seen whether low numbers were temporary or portend an extended period of reduced abundance.

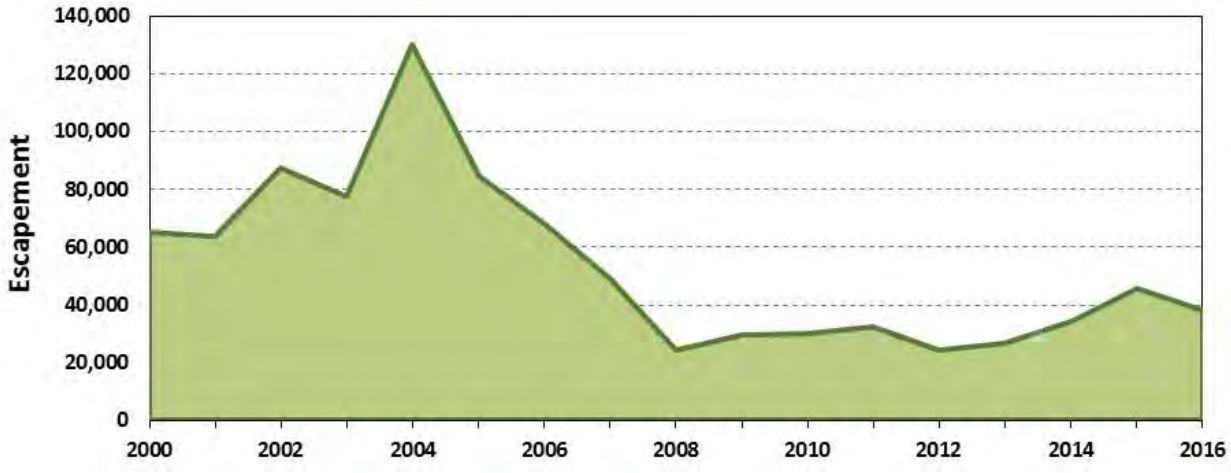


Figure 19. Escapement index for Northern Cook Inlet king salmon (total of index counts from 24 Susitna and Knik Arm streams).

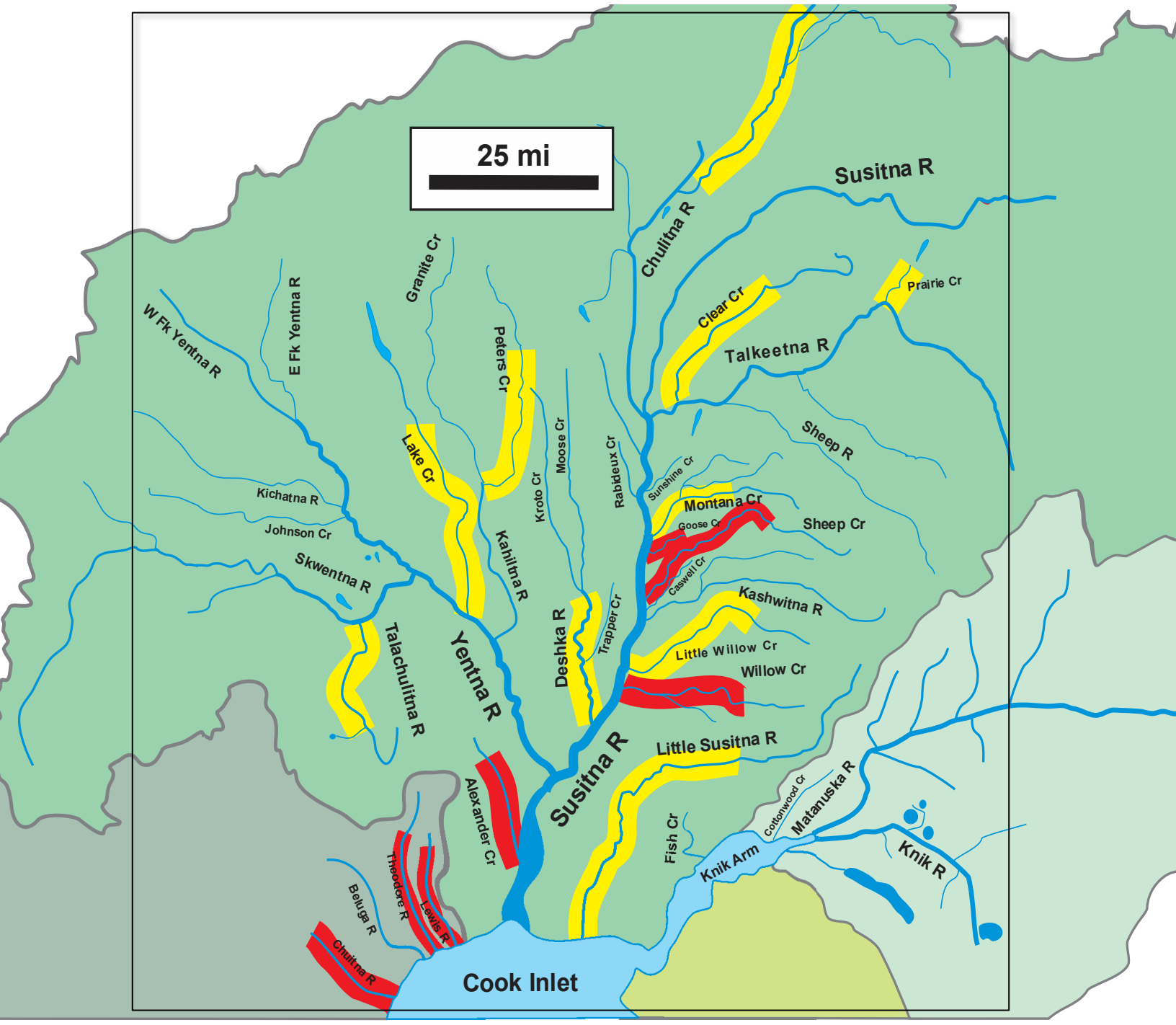


*Figure 20. Index areas for Northern Cook Inlet King populations with established escapement goals. Stocks of Concern are identified in **red**. Other stocks with goals are identified in **yellow**.*

PERSONAL USE FISHERIES – FOOD FOR ALASKANS

Over 30,000 households currently participate in the Cook Inlet personal use fishery on the Kenai Peninsula but opportunities are limited in Mat-Su waters

Personal use fisheries have a long and dynamic history in UCI but current fisheries were generally established in 1996. Since then popularity and participation have steadily increased. Over 30,000 household permits are now fished annually with a peak effort of 43,799 household-days in 2013. Harvest has averaged 97% sockeye with small numbers of other salmon species. Combined harvest of sockeye reached a record 630,400 in 2011.

Personal use fisheries for salmon are open to Alaska residents and occur in portions of the Kenai River, Kasilof River, Fish Creek, and the Beluga River. Most participants in the Kenai and Kasilof personal use fisheries come from areas outside the Kenai Peninsula including the Mat-Su as other regional personal use opportunities are quite limited. The only personal use fishing opportunity available within the Mat-Su Borough is located at Fish Creek, outlet to the Big Lake drainage. The Fish Creek fishery opens only occasionally. The Beluga River fishery is very small.

The intent behind personal use salmon fisheries is spelled out in 5 AAC 77.001 of Alaska codified fishery regulations. In summary, the intent acknowledges that implementation of the state's subsistence law changed things in a manner that excludes a large number of individuals from efficiently harvesting fish for their personal use. In recognition, the regulation states that "it is necessary to establish a fishery classified as personal use."

Myth: Personal Use Fisheries are Out of Control

Fact: Growth in the UCI personal use fisheries over the last two decades attests to the tremendous value placed by Alaskan families on the opportunity to harvest salmon for their tables

The UCI personal use fishery is the largest resident only fishery in Alaska, and puts more fish in more freezers of Alaskans that any other state fishery. The popularity of the personal use fishery has led to growing pains while access and infrastructure to the limited fishing area have struggled to catch up. However, the economic value and activity generated by the fishery easily justify and support significant investments in the facilities and systems needed for effective regulation and management.

Many criticisms of the personal use fishery are self-serving. Commercial interests see personal use as a direct competitor for harvestable surpluses of sockeye, a reduction in the local consumer market, and an effective management tool for regulating sockeye escapement. However, Alaska residents are voting with their feet and their wallets. The growth of this fishery clearly demonstrates the high value placed on the opportunity for Alaskans to harvest salmon for their tables.

THE MAT-SU IS LOOKING AFTER FISH HABITAT

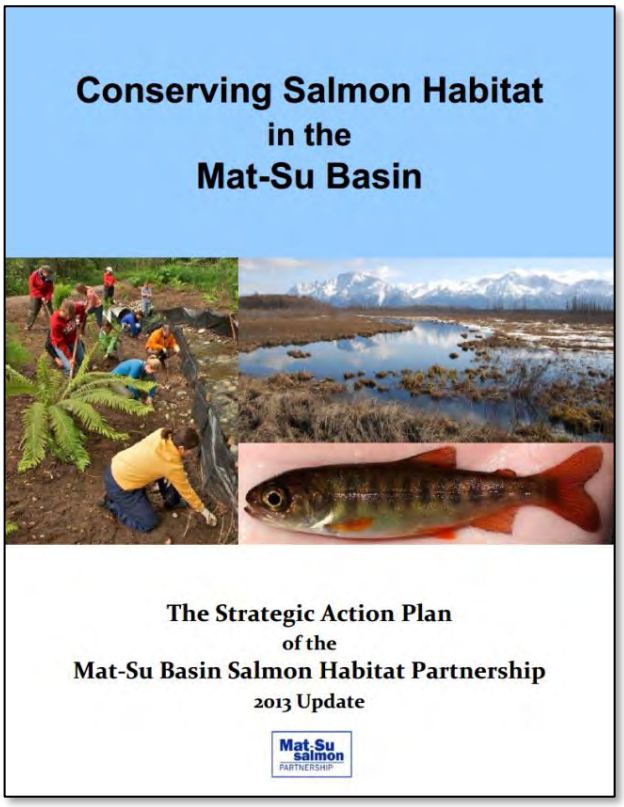
The Matanuska-Susitna Borough and its many partners are aggressively working to ensure the continuing health of its watersheds, wetlands, streams and waters

Northern Cook Inlet waters support one of the most diverse salmon ecosystems on the planet. The vast and varied landscape and topography of the Mat-Su Basin supports a tremendous variety of fish habitat. Salmon return to practically every accessible niche and water body including over 700 Mat-Su Basin rivers, streams and creeks totaling over 4,000 miles and spread across more than 25,000 square miles. The vast majority of this region is practically pristine.

The Matanuska-Susitna Borough (MSB) and its many partners are aggressively working to ensure the continuing health of its watersheds, wetlands, streams and waters. These efforts involve research, conservation, restoration and education projects. A few examples of this work are summarized below.

Partnerships

Concern over habitat impacts from population growth and development led ADF&G, the U.S. Fish and Wildlife Service (USFWS), The Nature Conservancy (TNC), the MSB and other agencies in 2005 to establish the Matanuska-Susitna Basin Salmon Habitat Partnership. Since its inception, the Partnership has brought together a diverse group of over 60 members representing businesses, governments, landowners, Native Alaskans, and the non-profit conservation community.



Since 2006, the partnership has funded and supported nearly 80 on-the-ground assessment, restoration, protection, and education projects. Salmon habitat activities are guided by goals and priorities identified in a strategic action plan most recently updated in 2013.

Work has included educational programs, fish passage improvements, lakeshore restoration, wetlands protection and recreational access. The partnership also supports an annual forum to exchange information and ideas about salmon and their habitat in the Mat-Su Basin.

Research & Science

FWC Fish Research Plan – developed by the MSB with agencies and community groups to prioritize research needs for UCI. This was the first time a comprehensive fish research plan has ever been done for UCI. Eleven research projects are now underway. This work was funded with a state grant awarded to the MSB in 2013 ($1.6m research, $900K fish passage).

Stream Mapping – Nature Conservancy, USGS and partners remapped the Mat-Su. This project increased map accuracy by doubling the number of streams represented and brought maps up to national standards.

Stream temperatures – Several years of work has been conducted to map water temperature trends by Cook Inletkeeper and University of Alaska Anchorage to locate cold water refugia as summer stream temperatures increase.

Juvenile salmon distribution – Important summer rearing areas and overwintering areas are being identified through field surveys by USFWS and others.

Conservation

Knik Islands – A new conservation easement, at the upper end of Knik arm, was established to protect 4,800 acres of prime salmon habitat through Great Land Trust and the property owner Eklutna Inc., the tribal native corporation. This easement ensures continuing access for traditional subsistence activities and permitted public uses.

Anadromous Waters Catalog & Instream flow reservations – Field work to collect data for the catalog and water reservations are being done every year. In 2014 & 2015, six streams and 84 stream miles were added to the AWC and applications for “core area” streams were filed to ensure sufficient water for fish.

Restoration

Revegetation – ADF&G & USFWS have ongoing programs to restore streambanks and lake shores in the Mat-Su along with other partners. ADF&G provides a training workshop annually on revegetation techniques. Projects have been completed on Wasilla Lake, Big Lake, Cottonwood Creek tributaries (2500 feet of lake shores, 1000 feet of streambanks).

Figure 21. Fish passage culvert installed on Caswell Lake Road in 2014.

Fish Passage Projects –ADF&G, MSB and USFWS have been surveying and prioritizing culverts that block fish passage since 2001. MSB, USFWS and partners, working with road service areas, nonprofits, local, state and federal agencies, have replaced over 100 culverts since 2001 at an average cost per project of $200,000. Over $8 million in federal, state, local and private funds have been spent on culvert replacement to improve fish passage and flood water management.

Fish Passage Ordinance – The MSB Assembly unanimously adopted an ordinance in 2013 establishing fish passage design standards for culverts on Borough roads. This means all culverts installed since then must allow for juvenile fish passage. This is the only such ordinance in the state.

Education

Mat-Su Salmon Habitat Partnership members continually reach out to the public to increase awareness of salmon life cycles and habitat needs through their two-day Salmon Science Symposium, stream signage “Baby Salmon Live Here,” project site tours and more.

Figure 22. ADF&G Spring Creek salmon education class with local school children.

PROPOSAL 213 – Paired Northern District Commercial & Sport Restrictions

5 AAC 21.358. Northern District Salmon Management Plan

Close commercial fishing within one mile of Little Susitna River when the Little Susitna River sport fishery is restricted to no bait, as follows:

Amend section (d) of the Northern District Salmon Management Plan by adding a new provision:

(3) when the Little Susitna River sport fishery is closed to use of bait, commercial fishing shall be closed within one mile of the Little Susitna River confluence with Knik Arm.

What is the issue you would like the board to address and why?

Although the Northern District Salmon Management specifies that:

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 fishermen a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of in river restrictions, the Little Susitna River sport fishery is restricted to artificial lures only from October 1 - August 5 as a conservation measure to ensure adequate escapement of king salmon, coho salmon, and in river species.

At the same time, commercial fishing is allowed to within 500 yards of the Little Susitna River confluence with Knik Arm. While the sport fishery is restricted by a bait closure for most of the season, the commercial fishery enjoys a more liberal harvest opportunity than exists around the confluences of most other significant Upper Cook Inlet salmon streams.

This occurs despite the fact that ADF&G only manages for abundance of king salmon and coho salmon in the Little Susitna River, with no established goals for other salmon species, and with annual sockeye salmon weir counts of less than 1,600 sockeye per year in 2013, 2014, and 2015.

Liberal commercial fishing near the Little Susitna River confluence with Knik Arm should not cause or contribute to restriction of the sport king salmon and sport coho salmon fisheries, which according to management plans, are to be managed to provide sport and guided sport fishermen a reasonable opportunity to harvest salmon resources. Liberal commercial harvest opportunity near the Little Susitna River confluence should also not contribute to depressed Little Susitna River sockeye salmon escapements.

PROPOSAL 214 – Paired Northern District Commercial & Sport Restrictions

5 AAC 21.366. Northern District King Salmon Management Plan.

Close commercial fishing within one mile of the Little Susitna River when more than half of Northern District streams with king salmon escapement goals are closed to sport harvest of king salmon or when the Little Susitna River sport fishery is restricted by emergency order, as follows:

Amend the Northern District King Salmon Management Plan by adding the following provisions:

(12) if more than half of the Northern District streams with king salmon escapement goals are closed to king salmon sport harvest; the commissioner shall close by emergency order, the Northern District commercial set net fishery until the first regular period after June 24.

(13) if the Little Susitna River sport fishery is restricted by emergency order: the commissioner shall close, by emergency order, commercial fishing within one mile of the Little Susitna River confluence with Knik Arm.

What is the issue you would like the board to address and why?

The purpose of this plan is to ensure an adequate escapement of king salmon into the Northern District drainages and to provide management guidelines to the department. The department shall manage the Northern District king salmon stocks primarily for sport and guided sport uses in order to provide sport and guided sport fishermen with a reasonable opportunity to harvest these salmon over the entire run as measured by the frequency of inriver restrictions.

During times of king salmon shortages in 2013, 2014 and 2015, the Commission discovered the above preamble language within the Northern District King Salmon Management Plan did not adequately address how ADF&G shall manage the commercial fishery at times when:

#1. More than half of the Northern District streams with ADF&G established king salmon escapement goals were closed to king salmon sport harvest for the entire year, yet the Northern District commercial fishery was allowed to continue harvesting kings salmon bound for all drainages, and all emergency restrictions to the Northern District king salmon fishery were removed whenever bait fishing was allowed in the Deshka River.

#2. The Little Susitna River sport fishery was restricted by emergency regulation but the commercial fishery was allowed to continue harvesting king salmon within a mile of the Little Susitna River confluence with Knik Arm. When the Little Susitna River sport fishery is restricted, why does the commercial fishery retain a liberal harvest opportunity on the same stock that the management plan stipulates be managed primarily for sport and guided sport uses?

PROPOSAL 220 – Larsen Creek Mouth Closure

5 AAC 61.120. Special provisions for the seasons, bag, possession, and size limits, and methods and means for Unit 5 of the Susitna River Drainage Area.

Establish sport fishery closure times in the Larsen Creek drainage, as follows:

Larsen Creek including all waters within a 1/4 mile radius of its confluence with the Talkeetna River closed to fishing from 11:00 pm to 6:00 am from July 1 to August 15.

What is the issue you would like the board to address and why?

Establish a more organized fishery at the confluence of Larsen Creek and the Talkeetna River. Susitna River drainage sockeye salmon are currently designated as a Stock of Yield Concern. Larsen Creek is one of three indicator/ index lakes used to assess sockeye production in the Susitna Valley. Larsen Lake is the only monitored and index lake used by ADF&G to assess the sockeye production and spawning success on the main stream of the Susitna River. It has barely made escapement goals in the last five years and has had to be closed twice during that time due to low escapement numbers early on.

The area where people fish is a concentrated area at the confluence of the Talkeetna River and Larsen creek. Access into the mouth of Larson Creek and the Talkeetna river confluence can be crowded with people wading shoulder to shoulder in the creek making fish passage difficult.

Rod and reel fishermen who would normally fish till 11:00 pm then sleep at the creek and fish at 1:00 am will be less likely to spend the night. Guides will still arrive at 6: 00 am to bring their clients through. This may intensify fishing during that period of the day, but it would allow a reprieve during the night for escapement.

PROPOSAL 230 - Deshka River King Salmon Management Plan

5 AAC 61.XXX.

Create a Deshka River King Salmon Management Plan, as follows:

The purpose of this plan is to direct the Department to manage the Deshka River sport king salmon fishery to attain spawning escapements within the SEG range of 13,000 - 28,000 fish, while encouraging adaptive management to attain the escapement objective in a manner which avoids inseason closures and restrictions when possible, and thereby maximizes benefit as much as practical. If the Department's annual Deshka River king salmon outlook calls for a total return of less than 21,000 king salmon, then effective starting May 16, the Department may use, in preferential order, one or more of the following tools to precautionarily increase king salmon escapement through the sport fishery: restrict anglers to use of one single hook only, restrict the fishery to use of artificial lures only, restrict harvest to one bag limit per day (either personal or proxy, but not both), reduce the number of days per week king salmon may be harvested.

Once the Department can project a king salmon escapement of 17,000 king salmon past the Deshka River Weir or when 13,000 king salmon have swum past the weir (whichever comes first), the Department may return the fishery to normal fishing regulations the following day.

The commissioner may depart from the provisions of the management plan under this section as provided in 5AAC 21.363(e).

What is the issue you would like the board to address and why?

For five consecutive years (starting in 2012) the Deshka River sport king salmon fishery has been managed by preseason emergency orders setting the regulations to be used at the start of each season. From discussions by the Commission with the ADF&G, it has come to our attention the Department seems to have no clear plan as to when and what emergency regulations may be appropriate at specific projected king salmon return levels. This creates several additional problems, a significant one of which is for the past five years regulations published in the Southcentral Alaska Sport Fishing Regulations Summary have been inconsistent with preseason emergency regulations issued by the Department. Every time this occurs the Department must spend considerable time and money (consequentially) to publicize these changes. We believe sport anglers may be better served with a Deshka River king salmon management plan printed in the regulations book, and clarifying what anglers might expect under specific king salmon outlook and return levels. This is even more appropriate during these times of state financial downturn.

In addition, when the fishery is managed by emergency regulation there is no clear way for the public to weigh in on an ineffective emergency regulation or propose a regulation change, since all emergency orders expire after 90 days. For example, for the past two years ADF&G has been implementing emergency Little Susitna River and Susitna River drainage king salmon regulations starting May 1, but since there is no significant king salmon harvest until after May 15, the

primary result of implementation on May 1 is to minimize benefit for hardly any, and in some years, zero biological gain.

Another dubious emergency regulation is the reduction in annual king salmon limit from five to two fish throughout the Susitna River drainage and Little Susitna River combined. On the Deshka River and Little Susitna River, in particular, there is enough angling effort that a reduction in annual bag limit likely has little positive affect on king salmon escapement — especially considering that many Alaskans simply take up proxy fishing to sidestep a decreased annual limit. In these times of state economic hardship wouldn't it be more cost effective if the Department simply kept the annual limit at five king salmon and, thereby, reduced the need for proxy permits and proxy fishing? During times of king salmon shortage, wouldn't king salmon escapements be more positively increased by restricting daily harvest to one bag limit (either personal or proxy, but not both)?

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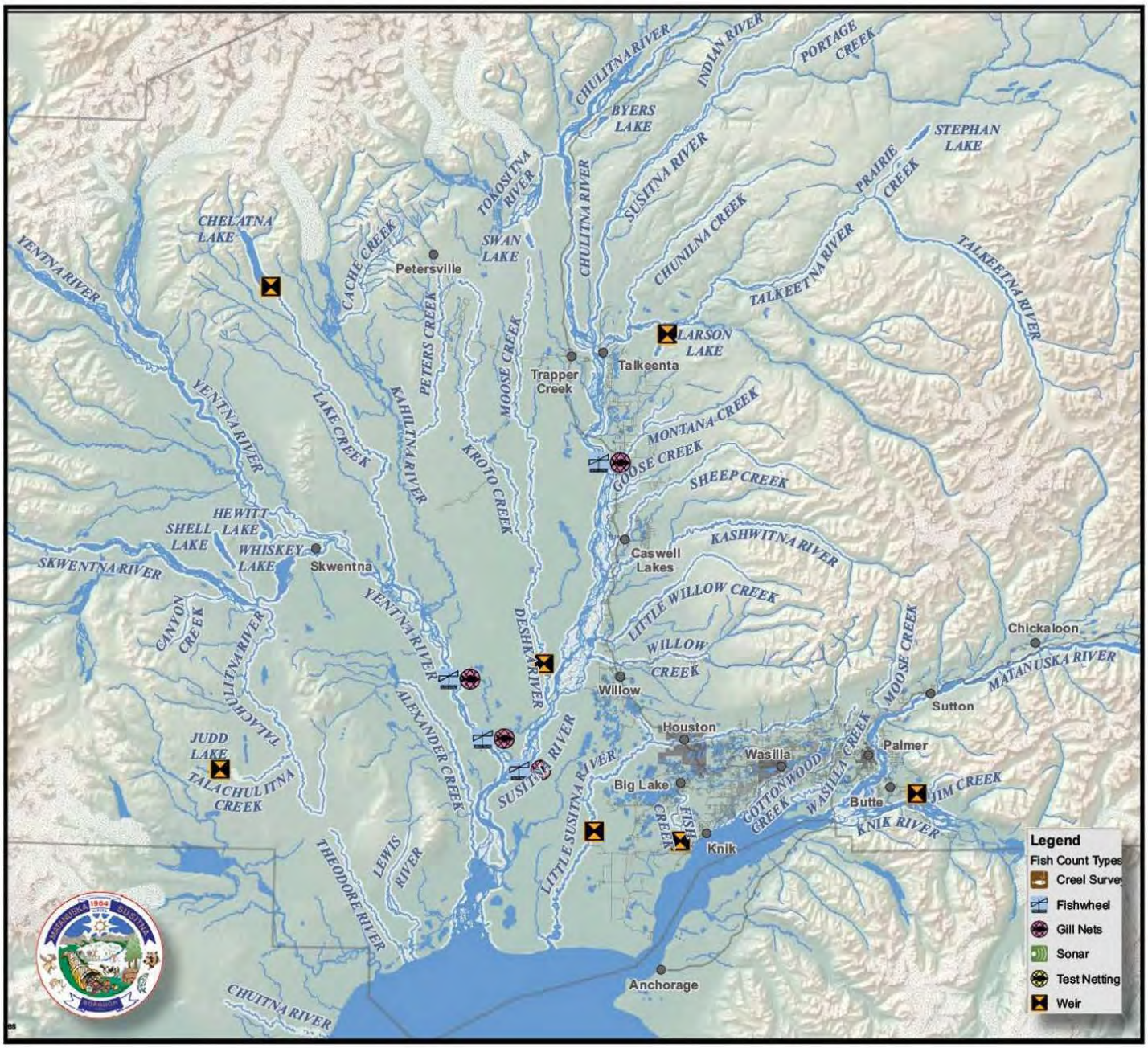
Matanuska-Susitna Basin



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Mat-Su salmon PARTNERSHIP

February 2, 2017

Alaska Board of Fisheries
ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

ATTN: Board of Fisheries Comments for Upper Cook Inlet Finfish Meeting

Dear Board of Fisheries members:

The Matanuska-Susitna Basin Salmon Habitat Partnership has been working to protect salmon habitat in the Mat-Su Basin for over 10 years. Guided by a strategic action plan, we do this by protecting the healthy habitat that occurs throughout the Mat-Su, restoring degraded habitat in the more developed areas, and preventing habitat degradation in ongoing development in the Mat-Su by improving our scientific knowledge of salmon and their habitat, and by providing a platform for collaboration and information sharing.

Management of Alaska's fisheries is respected around the world. We appreciate the crucial and challenging role the Board plays in this successful management model, and hope that knowing more about the Partnership will be helpful for the Board's consideration of Cook Inlet fisheries management policies.

The future of Mat-Su salmon depends upon what happens to them during each life stage, from their incubation and rearing in freshwater, to their maturation in saltwater, and during their return back to freshwater to spawn. While debate continues about the reasons for decline of some salmon stocks across Alaska and in the Mat-Su, it is well-known that freshwater habitat loss and fragmentation have been some of the primary drivers in the decline of anadromous fish in the U.S. and the world. Our goal is to ensure that Mat-Su salmon have healthy habitats in the Mat-Su and upper Cook Inlet so that habitat loss does not contribute to the other stresses that Mat-Su salmon must endure. In the Mat-Su, our top priority is to protect and maintain healthy habitat wherever possible.

The attached report "Matanuska-Susitna Basin Salmon Habitat Partnership: Healthy Salmon\Healthy Communities 2014-2015" describes progress of the Partnership in the areas of collaboration and information sharing, conservation, restoration and science for

the past two years. There are over 60 partners from business, non-profit, tribal and agency organizations who make this work possible.

Since 2006, the Partnership has funded a total of 78 salmon and salmon habitat related projects in the Mat-Su through the National Fish Habitat Partnership. This includes 32 science, 22 restoration, 12 conservation and 12 education/coordination projects totaling nearly $700,000 in direct funds with millions more in matching funds and volunteer contributions from private and public sources. This year, the Partnership anticipates funding multiple salmon habitat projects that include improving fish passage, eradication of pike, conservation of priority salmon habitat and quantifying wetland loss in Mat-Su's most populated areas.

We welcome any questions or requests for information that the Board of Fisheries may find helpful in its work toward maintaining sustainable fisheries into the future for all Alaskans, and thank you for your recognition of habitat as a critical foundation. If you have any questions for the Partnership about habitat issues in the Mat-Su, please feel welcome to get in touch.

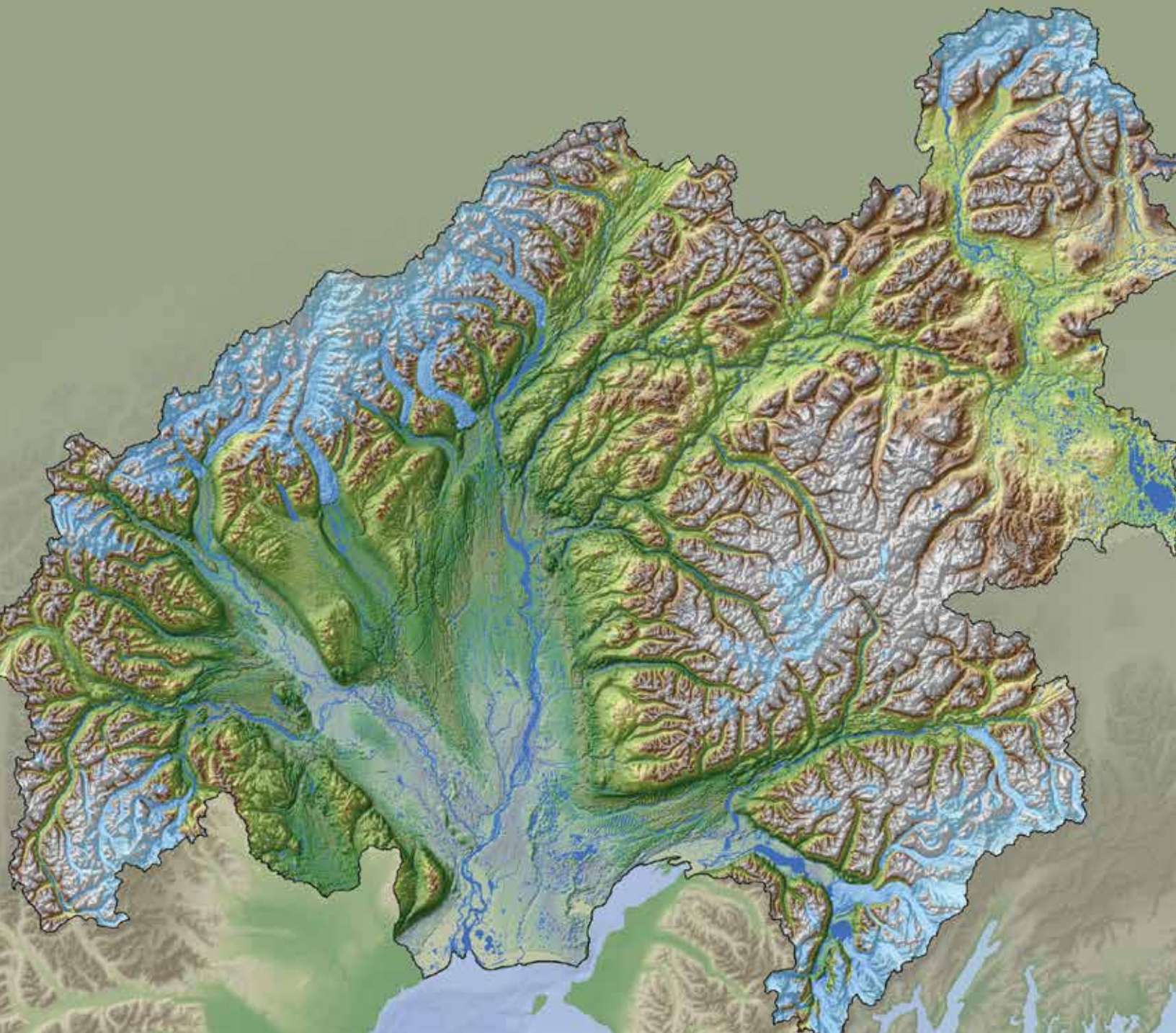
On behalf of the Mat-Su Salmon Partnership,

Jessica Speed
Mat-Su Basin Salmon Habitat Partnership Coordinator
jspeed@tnc.org
907-865-5713

MATANUSKA-SUSITNA BASIN
SALMON HABITAT PARTNERSHIP

Healthy Salmon / Healthy Communities

2014–2015



Mat-Su salmon PARTNERSHIP

Three happy girls after a day of fishing on the Little Susitna River. *Patty Sullivan/Mat-Su Borough*

On the cover: The Matanuska and Susitna watersheds, covering nearly 25,000 square miles and near in size to the state of West Virginia. Recent updated stream maps doubled the number of mapped stream miles to a total of over 50,000 miles.
James DePasquale/The Nature Conservancy

Dear Salmon Friends,

There are few places in the world where salmon still run up the rivers and feed communities; Mat-Su is one of them. From the fishermen who make a living catching salmon, to guides who take anglers up the rivers and residents who fish to put food in their freezers, salmon are an essential part of our lives.

Mat-Su Basin Salmon Habitat Partnership (the Partnership) members believe that thriving fish, healthy habitats, and vibrant communities can co-exist in the Mat-Su. We've been busy these past two years protecting and restoring salmon habitat through science, conservation, restoration and outreach projects. This report highlights just a few of the projects and collective achievements in 2014–2015.

Partnership Coordinator Jessica Speed (far left) and Partnership Steering Committee members Corinne Smith/The Nature Conservancy, Bill Rice/ U.S. Fish & Wildlife Service, Frankie Barker/Mat-Su Borough and Christy Cincotta/Tyonek Tribal Conservation District.

Thanks to the National Fish Habitat Partnership, the Partnership was able to award grants to local and regional organizations totaling $258,000 in 2014 and $236,000 in 2015 for 17 projects focused on conserving or restoring salmon habitat or improving knowledge about Mat-Su salmon and their habitat.

Our annual Mat-Su Salmon Science and Conservation Symposiums, held in November every year, continue to be our premier outreach event and annual general meeting for the Partnership. A new endeavor last summer took community leaders on a summer site tour of partner projects around Big Lake and Shell Lake, giving exposure to what partners are doing and why it matters.

The Partnership has several conservation priorities going forward. A main focus continues to be improving our knowledge of the location and presence of salmon in streams to provide essential information for protecting key existing habitat. In addition, as development continues, the Partnership is concerned about the alteration of riparian areas along lakes, streams and rivers; the filling of wetlands; and culverts that block fish passage. The latter is an ongoing priority that has seen many successful efforts over the years.

It takes all of us to keep our salmon habitat healthy. Please contact us if you want to know how you can help protect salmon in the Mat-Su.

Sincerely,
Mat-Su Basin Salmon Habitat Partnership Steering Committee and Coordinator

PARTNERSHIP

The Mat-Su Basin Salmon Habitat Partnership formed ten years ago to address increasing impacts from human use and development on salmon habitat in the Mat-Su. With the Partnership's existence came an opportunity to leverage past efforts and catalyze diverse interests around salmon and the conservation of their habitat. Today the Partnership is a diverse and dedicated group of over 60 organizations and individuals who are proactively addressing salmon habitat issues in the Mat-Su Basin. From the beginning, the Partnership has been united by a common vision where thriving fish, healthy habitats, and vibrant communities co-exist. An important role, and one we pride ourselves on, is bringing people together to gain and share knowledge, resources, and a vibrant appreciation for salmon.

2015 Mat-Su Salmon Symposium in Palmer. Please consider joining us at this fun annual event—everyone is welcome.

Annual Mat-Su Salmon Science and Conservation Symposium

The Symposium is the most diverse gathering of its kind in the Mat-Su, bringing together a broad range of people to share information and exchange ideas about salmon science and conservation. Presentations span a wide range of topics from the economic value of salmon to prioritizing efforts for strategic conservation. With near 100 people attending each day, over 30 oral and poster presenters, a 9-person planning committee, over 25 volunteers, and dozens of supporters, it is unquestionably a partnership event that embodies a spirit of cooperation and collaboration. Each year the Symposium continues to evolve and mature. These past two years have brought a record turnout of 140 people in a day, college and high school student participation, greater general public and local business involvement, and incredible keynote speakers. Perhaps its greatest asset, the Symposium provides a friendly forum where a range of ideas, collaborations and a diversity of views can be shared. We are looking forward to further involvement of the general public and broader community in future years.

Partnership Summer Site Tour

In August 2015, the Partnership and Cook Inlet Aquaculture Association hosted a first annual tour of partnership projects for community leaders. The goal of the event was to introduce the Partnership and the range of work undertaken by partners to a broader public audience. It was a great opportunity for all of us—participants, presenters and organizers—to get to know each other, learn more about Mat-Su salmon and their habitat, as well as the great efforts to maintain our wild salmon resources in the Mat-Su. We are so grateful to everyone who took the time to attend, demonstrating their commitment to keeping wild abundant salmon in the Mat-Su! Please stay tuned for details about our 2016 site tour.

Wildlife Wednesdays

In 2015 The Mat-Su Salmon Partnership partnered with the Alaska Department of Fish and Game (ADF&G), Alaskans for Palmer Hayflats and The Nature Conservancy on a monthly lecture series about local fish and wildlife resources at Mat-Su College called Wildlife Wednesdays.

Here are just a few of the creative outreach and education initiatives partners are offering:

Clean Boating Cook Inletkeeper's clean boating campaign addresses hydrocarbon pollution in Mat-Su waters.

Baby Salmon Live Here signs around the valley highlight that baby salmon do live here year round and need us to play a role. Get in touch with Great Land Trust if you want to sponsor a sign!

Septic Smart Mat-Su Conservation Services coordinates and educates about cost share pumping of septic tanks and potential impacts to nearby waterbodies.

Kingmakers Great Land Trust's Kingmakers initiative celebrates exceptional efforts of individuals for salmon.

Mike Gracz of Kenai Watershed Forum is crowned a King Maker by Kim Sollien of Great Land Trust for all the work he has done to map wetlands important to salmon.

Salmon in the Classroom Alaska Department of Fish and Game helps kids learn about the salmon lifecycle by nurturing salmon eggs to fry in the classroom.

Susitna Salmon Center in Talkeetna Aquatic Restoration and Research Institute has created a new home grown salmon education center, art gallery and gift shop.

Partnership site tour at Shell Lake. *Gary Fandrei /Cook Inlet Aquaculture Association*

17 With funding from the National Fish Habitat Partnership, the Partnership has provided nearly $500,000 for 17 salmon habitat projects in the Mat-Su in 2014 & 2015, with over 4 million dollars in direct match and leveraged funds from private and public sources.

72 The Mat-Su Salmon Partnership has funded 72 projects in the Mat-Su Basin since 2006.

Welcome to our 6 New Partners in 2014/15

- Alaska Trails (Non-profit)
- Knik Tribal Conservation District (Tribal)
- Mat-Su Trails and Parks Foundation (Non-profit)
- Sustainable Design Group (Business)
- 2 private individuals—Eagle River & Sutton residents

From an economic perspective, wild salmon may be the world's most perfect business model: Nature provides the necessary infrastructure, we invest nothing in the wild production system, and every year we harvest an enormously valuable resource.

– Richard Nelson, Keynote speaker at the 2015 Mat-Su Salmon Science and Conservation Symposium

SCIENCE

In the Mat-Su, as in much of Alaska, we are still lacking in some of the basic foundational science needed to inform strategic habitat conservation. Filling in those knowledge gaps has been a priority. In the last two years we have made some great strides in these foundational areas:

Mapping streams to national standards

In December of 2015 The Nature Conservancy and partners completed an update to the U.S. Geological Survey (USGS) National Hydrographic Database. This doubled the number of mapped streams in the Mat-Su Basin, increased the accuracy of stream maps, and brought them up to national standards. Having the many smaller tributary streams in which juvenile salmon mature before swimming to the sea now mapped accurately for the first time, will help us all make salmon-friendly decisions about how to manage and develop our lands and waters. The utility of this publicly-available dataset goes beyond salmon to potentially include enhanced flood preparedness, emergency response, and community and development planning. For the Partnership, it improves our ability to effectively participate in the national fish habitat assessment looking at the status of fish habitat across the nation and helps partners prioritize fish passage restoration efforts.

Increasing knowledge of juvenile salmon

Partners have continued to increase our knowledge of juvenile salmon distribution, abundance and important areas for summer rearing and overwintering over the last few years. For example, Aquatic Restoration and Research Institute scientists discovered greater use of the mainstem Susitna River by juvenile salmon. Fisheries biologists from the U.S. Fish and Wildlife Service (USFWS) have found that although widespread in summer in tributaries and mainstem rivers, juvenile coho salmon in the Big Lake drainage have just a handful of key overwintering areas. Knowing how juvenile salmon are using habitat throughout the year, and what areas are most important for them is critical information for making informed decisions regarding development and where to spend limited fish passage restoration dollars to improve access to key habitats.

Left: Using a minnow trap to document salmon presence. *Katrina Mueller/USFWS*
Above Top: Trapping juvenile salmon on Swiftwater Creek to understand how, where and when they use certain habitats. *Katrina Mueller/USFWS*
Above: Juvenile coho salmon from the Big Lake drainage. *Caroline Walls/USFWS*

Long-term stream temperature monitoring and identification of cold water refugia

Scientists agree that, in general, when water temperatures exceed 17°C (~62°F) salmon suffer negative effects. Prolonged exposure to high temperatures can even result in death. Cook Inletkeeper (CIK) and partners are maintaining a network of stream temperature monitoring sites to track long-term patterns across the Mat-Su basin. In addition, CIK and U.S. Fish and Wildlife Service are identifying cold water refugia—areas that will remain coolest in a warming climate and therefore provide important habitat to support salmon resiliency. This knowledge is directly informing land trusts as they work to conserve important lands today and into the future.

Building on their work in Mat-Su, CIK, and University of Alaska Anchorage also established minimum standards for water temperature data collection for Alaska. Acquiring more comparable data across the state will aid in understanding current and future regional temperature trends in Alaska's freshwater habitat.
Go to the AKOATS website!
http://accs.uaa.alaska.edu/aquatic-ecology/akoats/.

Index watersheds

In the last two years, the Partnership's Science and Data Committee started work to identify representative index watersheds. These areas will be used for focused study on salmon and their habitat, and to detect both change within these individual index watersheds, and across the basin as a whole over time.

Invasive species surveys

Several non-native invasive species like the aquatic invasive plant Elodea and predatory fish northern pike pose threats to salmon and their habitat. Partner organizations are including surveys in their field work for early detection of aquatic invasive species spread. *Read more in restoration section.

The Mat-Su is the fastest growing area in the state by a large margin. How do you conserve habitat if you don't know where it is? You have to identify where your streams are and that's what the new stream mapping does for the Mat-Su.

– Larry Engel, retired Alaska Department of Fish and Game and member of the Mat-Su Borough Fish and Wildlife Commission

RESTORATION

Sockeye salmon struggling to move upstream through a road-stream crossing to spawning grounds. *Katrina Mueller/ USFWS*

The quality of salmon spawning, rearing, and overwintering habitat in the Mat-Su is closely linked to the level and location of human activity. Areas that overlap with more developed locations like the Palmer-Wasilla area are more degraded. Impacts are typically related to removal or alteration of native shoreline vegetation, degraded water quality, fish passage impediments and water flow changes.

Fish passage

Adult fish must be able to reach spawning areas and juvenile fish must be able to move both up and downstream to feed, find cover and overwinter: year-round, free passage is critical. Where roads cross streams, many culverts block or impede fish movements. A cost-benefit fish passage prioritization done in 2015 indicated that 290 barriers to fish passage remain in Mat-Su and likely prevent or limit salmon from reaching spawning or nursery grounds. Sixty-three of these barriers account for 75% of the total miles upstream of barriers. This information will help partners prioritize culverts for replacement opening up free passage for juvenile and adult salmon.

Aquatic invasives

Aquatic invasive species can have significant impacts on salmon and their habitat. Current threats to salmon in the Mat-Su are from water and shoreline plants Elodea and reed canarygrass, as well as the fish northern pike. The Partnership goal is to prevent further invasive introductions. The goals for the existing threats are:

- Eradication for Elodea, which was discovered in Alexander Lake in 2014. Treatment is planned for summer 2016 with partners performing detection surveys and educational outreach on the highest risk waterbodies.

- Containment for northern pike because they are much more widespread and well established than Elodea. Over 100 waterbodies in the Mat-Su have confirmed pike. Alexander Creek, which was formerly the home of a premier Chinook salmon fishery, is a focus area for ADF&G pike containment and localized eradication. Results have been positive and with each year of pike suppression, Chinook fry are being found farther up the stream system.

- Containment for reed canarygrass, which also is much more widespread. Partners have been mapping the extent of reed canarygrass and herbicide control is planned for in 2016.

14 barrier removals opened up 49.5 miles of upstream habitat and 857 acres of lakes.

11 shoreline restoration projects on public and private land through ADF&G/USFWS cost share program.

Stream bank restoration

In 2015, the Partnership identified maintenance of shoreline areas along lakes, streams and rivers as one of its top four conservation priorities. In the last two years the Mat-Su Valley Habitat Restoration and Protection Cost Share Program, administered cooperatively by ADF&G and USFWS completed 11 restoration projects on public and private land in the Mat-Su that conserved 2,500 feet of lake and streamside habitat along salmon streams; restored nearly 1,000 feet; and removed 670 feet of human-made structures that impacted salmon habitat.

Palmer Soil and Water Conservation District completed an assessment of riparian impacts on 35 priority waterbodies in the Mat-Su. Although some waterbodies like Big Lake, Blodgett Lake, and Cottonwood Creek had 27%, 12%, and 4% impacted shorelines respectively, the overall percentage of impacted shorelines remains relatively low. This underscores both the recognition there are areas of concern, and that there is a great opportunity in the Mat-Su to conserve riparian salmon habitats before they are impacted and financial resources expended in their restoration.

By connecting with local experts at annual Mat-Su Salmon Symposiums, we've been able to build relationships and increase our capacity to achieve our fish habitat restoration goals. Through these connections we've successfully opened over 20 miles of salmon habitat through culvert replacements since 2012.

– Christy Cincotta, Tyonek Tribal Conservation District

Restoring streambanks on Wasilla Creek. These vegetated shoreline areas provide cover for juvenile fish; cooler temperatures; have slower moving currents where weaker swimming fish can rest; and have over-hanging plants that fall into the water, creating food sources for aquatic insects that juvenile salmon eat. *Photos: Frankie Barker/Mat-Su Borough and Jessica Speed/The Nature Conservancy*

CONSERVATION

Katrina Mueller/USFWS

In the Mat-Su, there is still high quality, intact salmon habitat, and our top priority is to conserve and maintain that habitat—so salmon can successfully complete each life stage, from egg, alevin, fry, smolt to spawning adult. Strategically conserving healthy and intact salmon habitat has been one of the Partnership's greatest areas of success.

Important salmon habitat conserved

Since 2014, Great Land Trust and partners have conserved nearly 2,000 acres of priority estuaries, wetlands, riparian areas, and uplands important for salmon in perpetuity under conservation easements. Priority lands for conservation were identified in a parcel prioritization (started in 2009 and updated in 2014) that identified 1,000 parcels providing important spawning, rearing, and overwintering habitat for salmon on 35 priority waterbodies.

Stream protection

Six streams and 84 stream miles were added to the Anadromous Waters Catalog. Adding waters to the Anadromous Waters Catalog improves information about salmon distribution and affords streams the protections under state law that come by being listed. Currently less than 20% of the miles of mapped streams in Mat-Su are in the catalog.

Conserving water quantity

Partners have been completing water reservations on important salmon streams vulnerable to development. This means that as the region grows and demand for water resources increases, or climatic conditions change, water will be reserved to remain in the stream for salmon. Applications for water reservations have focused on covering the most populated 'core area'—Palmer-Wasilla-Knik area and along the Parks Highway from Willow to Talkeetna. These applications should be complete by 2017. A prioritization is underway by USGS, USFWS and ADF&G to help identify the next set of priority streams.

2000 Nearly 2,000 acres of important salmon habitat conserved.

6/84 6 streams and 84 stream miles added to the Anadromous Waters Catalog.

Great Land Trust partnered with the Student Conservation Association to build a light penetrating wetland boardwalk that provides an easy way for people to experience the Palmer Hay Flats Game Refuge.
Kim Sollien/Great Land Trust

In conclusion

Our Partnership and salmon habitat conservation in the Mat-Su is strong because of the competence and involvement of our Partners. Each has unique knowledge, expertise and resources to achieve together what we could not alone. We invite you to join us—students, teachers, scientists, managers, landowners, fishermen, developers and industry—we can all contribute in positive ways to a future where salmon continue to thrive in the Mat-Su. Looking forward, the Partnership will continue to focus on the goals laid out in our strategic plan, ensuring that salmon have healthy habitat to rear in and return to in the Mat-Su. We have a lot of people to thank for our collective success, many that could not be included in this publication.

The Partnership has been an invaluable resource in connecting Great Land Trust with agency and community partners who have helped us target our conservation dollars toward the lands that provide highest value for salmon and water quality. Thanks to the support of the Partnership, GLT has successfully conserved over 8,000 acres including 6,000 acres of wetlands and 44 miles of shoreline important to salmon in the Mat-Su.

– Kim Sollien, Great Land Trust

Mat-Su Salmon Habitat Partners

Alaska Department of Commerce, Community and Economic Development
Alaska Department of Environmental Conservation
*Alaska Department of Fish and Game
Alaska Department of Natural Resources
Alaska Department of Transportation & Public Facilities
Alaska Center for the Environment
Alaska Outdoor Council
Alaska Pacific University
Alaska Railroad Corporation
*Alaska Salmon Alliance
Alaska Trails
AlaskaChem Engineering
Alaskans for Palmer Hay Flats
Aquatic Restoration & Research Institute
Bureau of Land Management
Butte Area Residents Civic Organization
*Chickaloon Village Traditional Council
City of Palmer
ConocoPhillips Alaska, Inc
Cook Inlet Aquaculture Association
Cook Inletkeeper
Eklutna Tribal Conservation District
Environmental Protection Agency
Envision Mat-Su
Fishtale River Guides
Glacier Ridge Properties
Great Land Trust
HDR Alaska, Inc
Knik River Watershed Group
Knik Tribal Conservation District
Matanuska River Watershed Coalition
*Matanuska-Susitna Borough
Mat-Su Anglers
Mat-Su Conservation Services
Mat-Su Trails & Parks Foundation
Montana Creek Campground
*National Marine Fisheries Service/NOAA
National Park Service
*Native Village of Eklutna
Natural Resources Conservation Service
Palmer Soil and Water Conservation District
Pioneer Reserve
Pound Studio
SAGA
Sierra Club
Sustainable Design Group
The Conservation Fund
*The Nature Conservancy
The Wildlifers
Three Parameters Plus, Inc
*Tyonek Tribal Conservation District
United Cook Inlet Drift Association
United Fishermen of Alaska
Upper Susitna Soil & Water Conservation District
U.S. Army Corps of Engineers
*U.S. Fish and Wildlife Service
U.S. Geological Survey
U.S. Forest Service
Wasilla Soil and Water Conservation District

The Partnership includes 59 organizations and two private individuals.
*Organizations on the Steering Committee

Learn more and get in touch!

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IN REPLY REFER TO:
OSM 17004.GP

Mr. John Jensen, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

FEB 0 9 2017

Dear Chairman Jensen:

The Alaska Board of Fisheries (Board) will consider 173 proposals, among other issues, at its Upper Cook Inlet Finfish meeting in Anchorage from February 23 through March 8, 2017. We have reviewed the proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that have potential impacts on Federally qualified subsistence users and fisheries resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola, Jr.
Assistant Regional Director

Enclosure

cc: Sam Cotten, ADF&G, Juneau
Anthony Christianson, Chair FSB
Lisa Olson, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Thomas Brookover, ADF&G, Anchorage
Administrative Record
Glenn Haight, ADF&G, Juneau
Jill Klein, ADF&G, Anchorage
Stewart Cogswell, OSM, Anchorage
Scott Kelley, ADF&G Juneau
Interagency Staff Committee

OFFICE OF SUBSISTENCE MANAGEMENT (OSM) COMMENTS ON ALASKA BOARD OF FISHERIES PROPOSALS for the UPPER COOK INLET MANAGEMENT AREA

State of Alaska

Board of Fisheries Meeting

February 23 – March 8, 2017

Anchorage, Alaska

Office of Subsistence Management Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

Proposal 71 – 5 AAC 57.120. Align size restrictions for Dolly Varden and rainbow trout bag limit in the flowing waters of the Kenai River Drainage Area.

Current Federal Regulations:

§____ 27(e)(10)(iv)(F)

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 18 inches in length are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession. Only one of these fish can be 20 inches or longer.

(3) In flowing waters, daily harvest and possession limits for rainbow/steelhead trout are one per day and one in possession and must be less than 18 inches in length. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

§____ 27(e)(10)(iv)(G)

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

(3) In flowing waters, daily harvest and possession limits for rainbow/steelhead trout are one per day and one in possession and it must be less than 16 inches in length. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal would result in increasing regulatory complexity and enforcement concerns because of the divergent State and Federal length limit regulations. If this proposal is adopted, the Federal Subsistence harvest size limits for Rainbow Trout and Dolly Varden in the Kenai River watershed below Skilak Lake will be more liberal (18 inches in length rather than 16 inches in length) than the new sport fishery limits.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adoption of this regulation would potentially reduce sport fishery induced mortality of Rainbow Trout and Dolly Varden by eliminating harvest of fish between 16 and 18 inches in

length and from catch and release mortality in the Kenai River below Skilak Lake. Reducing mortality rates caused by the sport fishery on high use area stocks may result in some minimal increase in the numbers of both species available for harvest by Federally qualified subsistence users.

Proposal 72 – 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai River Drainage Area. Amend general provisions for lakes and ponds of the Kenai River drainage to restore winter ice fisheries for landlocked coho salmon less than 16 inches in length, as follows:

Current Federal Regulations:

§____ 27(e)(10)

> *(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. Current Federal subsistence fisheries regulations do not differentiate between landlocked and free swimming salmon in the Cook Inlet Area. Adoption of this proposal will result in additional harvest opportunity for Federally qualified subsistence users fishing with a rod and reel for landlocked Coho Salmon in the lakes and ponds under Federal subsistence fisheries jurisdiction.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: Adoption of this proposal will effectively authorize Federally qualified subsistence users to harvest landlocked Coho Salmon under 16 inches in length in waters under Federal subsistence fisheries jurisdiction in the lakes and ponds of the Kenai River Middle Section Area all year. Though the opportunities to participate in this fishery will depend upon temporary blockage of water bodies to form lakes and ponds following high water events in portions of the Kenai River drainage, authorizing this fishery may provide some additional opportunity for Federally qualified subsistence users if they choose to participate.

Proposal 73 – 5 AAC 56.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Align the Swanson River rainbow trout spawning closure with the proposed Kenai River drainage rainbow trout spawning closure start date.

Current Federal Regulations:

§100.27 Subsistence taking of fish.

§____ 27(e)(10)(4)(D)

(i) At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56 and 5 AAC 57 and 5 AAC 77.540).

§____ 27(e)(10)(4)(F)

For Federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik may take resident fish species including lake trout, rainbow trout, and Dolly Varden/Arctic char with jigging gear through the ice or rod and reel gear in open waters. Resident fish species harvested in the Kenai River drainage under the conditions of a Federal subsistence permit must be marked by removal of the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these resident species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.54), except for the following harvest and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal would result in expanding the season dates for the Federal subsistence rod and reel fishery in the Swanson River drainage by expanding the Rainbow Trout spawning closure period for an additional 19 days. At this time, adoption of this proposal is not expected to significantly impact current participation levels in the Federal subsistence fisheries of the Swanson River drainage.

Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal.

Rationale: The Alaska Department of Fish and Game submitted this proposal as part of a suite of proposals to simplify and align regulations. Detailed justification for this proposal was not offered. Support for this proposal is conditional and is dependent upon the Alaska Department of Fish and Game's justifications to increase fishing opportunity without significantly impacting the Swanson River Rainbow Trout population. Although adoption of this proposal would increase Federal subsistence users fishing opportunities in the Swanson River drainage, current participation levels are not expected to be significantly impacted. The OSM may change positions on this proposal depending upon further detailed justifications from Alaska Department of Fish and Games through staff comments or presentations at the Board of Fisheries meeting.

<u>PROPOSAL 76</u> – 5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage

Area. Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar closure periods.

Current Federal Regulations:

§____ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10′ N. Lat.) and a line extending south from Cape Fairfield (148°50.25′ W. Long.).*

(D) Residents of Hope, Cooper Landing, and Ninilchik may take only sockeye salmon through a dip net and a rod and reel fishery at one specified site on the Russian River, and sockeye, late-run Chinook, coho, and pink salmon through a dip net/rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided in this section. For Ninilchik residents, salmon taken in the Kasilof River Federal subsistence fish wheel, and dip net/rod and reel fishery will be included as part of each household's annual limit for the Kenai and Russian Rivers' dip net and rod and reel fishery. For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for early-run Chinook salmon (unless otherwise provided for), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released. For the Russian River fishing site, incidentally caught fish may be retained for subsistence uses, except for early- and late-run Chinook salmon, coho salmon, rainbow trout, and Dolly Varden, which must be released. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Harvests must be reported within 72 hours to the Federal fisheries manager upon leaving the fishing site, and permits must be returned to the manager by the due date listed on the permit. Chum salmon that are retained are to be included within the annual limit for sockeye salmon. Only residents of Cooper Landing, Hope, and Ninilchik may retain incidentally caught resident species.

(1) The household dip net and rod and reel gear fishery is limited to three sites:

(i) At the Kenai River Moose Range Meadows site, dip netting is allowed only from a boat from a Federal regulatory marker on the Kenai River at about river mile 29 downstream approximately 2.5 miles to another marker on the Kenai River at about river mile 26.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56 and 5 AAC 57 and 5 AAC 77.540).

(ii) At the Kenai River Mile 48 site, dip netting is allowed while either standing in the river or from a boat, from Federal regulatory markers on both sides of the Kenai River at about river mile 48 (approximately 2 miles below the outlet of Skilak Lake) downstream approximately 2.5 miles to a marker on the Kenai River at about river mile 45.5. Residents using rod and reel gear at this fishery site may fish from boats or from shore with up to two baited single or treble hooks June 15-August 31. Seasonal riverbank

closures and motor boat restrictions are the same as those listed in State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.540).

(2) Fishing seasons are as follows:

(i) For sockeye salmon at all fishery sites: June 15-August 15;

(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

(1) In the Kenai River below Skilak Lake, fishing is allowed with up to two baited single or treble hooks June 15-August 31.

(F) For Federally managed waters of the Kenai River and its tributaries below Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik may take resident fish species including lake trout, rainbow trout, and Dolly Varden/Arctic char with jigging gear through the ice or rod and reel gear in open waters. Resident fish species harvested in the Kenai River drainage under the conditions of a Federal subsistence permit must be marked by removal of the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these resident species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57, and 5 AAC 77.54), except for the following harvest and possession limits:

(J) Residents of Ninilchik may harvest Sockeye, Chinook, Coho, and Pink salmon with a gillnet in the Federal public waters of the Kenai River. Residents of Ninilchik may retain other species incidentally caught in the Kenai River except for Rainbow trout and Dolly

Varden 18 inches or longer. Rainbow trout and Dolly Varden 18 inches or greater must be released.

(4) Fishing will be allowed from June 15 through August 15 on the Kenai River unless closed or otherwise restricted by Federal special action.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. This complex proposal may impact Federally qualified subsistence users by restricting, shifting, or liberalizing the various fisheries closures in place to protect various spawning or milling fish stocks in the Kenai River drainage. Some of the proposed changes will potentially provide months of additional fishing opportunity for Federally qualified subsistence users while others may restrict months of fishing opportunities, depending upon which portion of the watershed is addressed. Adoption of this proposal will indirectly liberalize, delay, or restrict several of the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction. Other Federal subsistence fisheries of the Kenai River drainage are defined in Federal regulation and those defined fisheries season dates will not change if this proposal is adopted. Current Federal subsistence regulations for the Kenai River drainage state "*Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations…"* and adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

The following comparison is divided by component of each proposed change of the proposed area closures and is an attempt to illustrate the impacts this proposal will have on the Federal subsistence fisheries if adopted.

For the Funny and Killey rivers:

5 AAC 57.121(2) is amended to read:

(2) the following waters of the Kenai River ***drainage*** *are closed to sport fishing, as follows:*

(A) from ***May 1 – July 31*** *[APRIL 15 – AUGUST 15], Slikok Creek****, Funny River, and Killey River****;*

Impacts from adoption of this portion of the proposal on the Federal subsistence rod and reel fishing regulations for the Funny and Killey rivers would be a mixture of restrictions and liberalizations depending upon tributary and what portion of the tributary being fished. The Federal subsistence s*easons, areas "… for take are the same as for the taking of these salmon species under State of Alaska fishing regulations…"* and if this proposal is adopted the Federal subsistence fishing seasons will change in the referenced areas of the Kenai River watershed.

For this section of the proposal, Federal subsistence rod and reel fishery is only authorized within the boundaries of the Kenai National Wildlife Refuge which include the majority of both the Killey and Funny rivers upstream of the Refuge Boundary. Adoption of this portion of the

proposal would result in restricting the Federal subsistence rod and reel fishery in that portion of the Funny River within the Refuge boundary by approximately three months (May 1 – July 31) annually (existing area open all year as compared to the proposed May 1 – July 31 closure). The portion of the proposal addressing the Killey River will impact the Federal subsistence fishing season by restricting the fishery for an additional three months (currently open all year as compared to the proposed May 1 – July 31 closure).

For the flowing waters of the Lower Kenai Section, including Beaver Creek, Soldotna Creek, and in the Moose River upstream of the Sterling Highway Bridge:

> *(B) from* ***May 1 – June 10, all remaining*** *[JANUARY 1 – DECEMBER 31, THE] flowing waters of* ***the Lower Kenai Section, including Beaver Creek,*** *Soldotna Creek****, and in the Moose River upstream of the upper edge of the Sterling Highway Bridge*** *[UPSTREAM OF ADF&G MARKERS LOCATED APPROXIMATELY 100 FEET UPSTREAM FROM ITS CONFLUENCE WITH THE KENAI RIVER];*

For this section of the proposal, the Federal subsistence rod and reel fishery is only authorized within the boundaries of the Kenai National Wildlife Refuge upstream of the referenced part of the Moose River. Adoption of this portion of the proposal would result in liberalizing the Federal subsistence rod and reel fishery by one day (May 1). The proposed one day liberalization is not easily apparent in the proposed language because the existing regulation governing season length for the Funny River (*5 AAC 57.121(2)(F)*) would be repealed and the content of (F) would be moved to (B).

For the portion of the Kenai River upstream of the Lower Killey River to Skilak Lake outlet:

(K) from **May 1 – June 10** [MAY 2 – JUNE 10], in that portion of the Kenai River from an ADF&G regulatory marker located approximately one mile upstream from the mouth of the Lower Killey River upstream to an ADF&G regulatory marker located at the outlet of Skilak Lake;

Federal subsistence rod and reel fishing regulations in the reference area below the outlet of Skilak Lake but above the Federal subsistence dipnet and rod and reel fishery area (that portion of the Kenai River below River Mile 48 that overlaps with the are identified in this proposal), like the State sport fishery season, would be restricted by one additional day (loss of May 1).

The Federal subsistence rod and reel fishery between Kenai River Mile 45.5-48 would not be impacted by this proposal because the Federal subsistence rod and reel fishing for salmon in the referenced area is cumulatively open from June 15 through September 30 for the different species. Adoption of the portion of the proposal which addresses the Kenai River upstream from River Mile 48 up to the outlet of Skilak Lake portion of the proposal will not impact the Federal subsistence rod and reel fishery season dates.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rationale: Adoption of this proposal will potentially adjust some Federal subsistence fisheries season dates as a result of modifying State sport fishing area closures. Adoption of this proposal is not expected to result in changes to current effort or harvest levels in the Federal subsistence fisheries though it could initially increase regulatory complexity and user confusion.

The OSM does have concerns regarding significant expansion and restriction of the number of days of opportunity for sportfishing anglers which ultimately result in modification to Federal subsistence fisheries. The OSM's concerns are focused on proposing modifying fishing season lengths without providing detailed justifications for each proposed change, expected results, and potential impacts will have on the various fish species located in various portions of the Kenai River watershed.

Though adoption of this proposal may not result in significant changes to the Federal subsistence fisheries, ANILCA Title VIII provides for the closure of subsistence uses for conservation purposes, continuance of subsistence uses, or for reasons of public safety. The justifications offered by the proponent do not contain enough information to meet these thresholds. The OSM looks forward to receiving additional information from ADF&G at the Board of Fisheries meeting.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times would have to submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and/or submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 77 – 5 AAC 57.122. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Align the Kenai River tributary fishing closure start dates with the proposed king salmon sanctuaries and rainbow trout spawning closure start dates, and align all Kenai River tributary closures so they have similar fishing seasons, such that anglers are prohibited from fishing for salmon.

Current Federal Regulations:

§____ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10′ N. Lat.) and a line extending south from Cape Fairfield (148°50.25′ W. Long.).*

> *(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:*

(D) Residents of Hope, Cooper Landing, and Ninilchik may take only sockeye salmon through a dip net and a rod and reel fishery at one specified site on the Russian River, and sockeye, late-run Chinook, coho, and pink salmon through a dip net/rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided in this section. For Ninilchik residents, salmon taken in the Kasilof River Federal subsistence fish wheel, and dip net/rod and reel fishery will be included as part of each household's annual limit for the Kenai and Russian Rivers' dip net and rod and reel fishery. For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for early-run Chinook salmon (unless otherwise provided for), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released. For the Russian River fishing site, incidentally caught fish may be retained for subsistence uses, except for early- and late-run Chinook salmon, coho salmon, rainbow trout, and Dolly Varden, which must be released. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Harvests must be reported within 72 hours to the Federal fisheries manager upon leaving the fishing site, and permits must be returned to the manager by the due date listed on the permit. Chum salmon that are retained are to be included within the annual limit for sockeye salmon. Only residents of Cooper Landing, Hope, and Ninilchik may retain incidentally caught resident species.

(1) The household dip net and rod and reel gear fishery is limited to three sites:

(iii) At the Russian River Falls site, dip netting is allowed from a Federal regulatory marker near the upstream end of the fish ladder at Russian River Falls downstream to a Federal regulatory marker approximately 600 yards below Russian River Falls. Residents using rod and reel gear at this fishery site may not fish with bait at any time.

(2) Fishing seasons are as follows:

(i) For sockeye salmon at all fishery sites: June 15-August 15;

(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas

(including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

> *(5) For other salmon 16 inches and longer, the combined daily harvest and possession limits are six per day and six in possession, of which no more than four per day and four in possession may be coho salmon, except for the Sanctuary Area and Russian River, for which no more than two per day and two in possession may be coho salmon.*

(G) For Federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik may take resident fish species including lake trout, rainbow trout, and Dolly Varden/Arctic char with jigging gear through the ice or rod and reel gear in open waters. Resident fish species harvested in the Kenai River drainage under the conditions of a Federal subsistence permit must be marked by removal of the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these resident species under Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.54), except for the following harvest and possession limits:

> *(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.*
>
> *(3) In flowing waters, daily harvest and possession limits for rainbow/steelhead trout are one per day and one in possession and it must be less than 16 inches in length. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/fisheries: Yes. If this proposal is adopted, Federally qualified subsistence users may be slightly impacted by modifying the various fisheries closures in place for the "Middle River" area of the Kenai River watershed. These closures are in place to protect various spawning or milling fish in the Kenai River drainage as well as to provide opportunity for Sockeye Salmon to escape through the Russian River weir.

Adoption of this proposal will indirectly liberalize several of the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction because Federal subsistence rod and reel salmon fishing seasons in the Middle Kenai River and tributaries (except for portions of the Russian River) are identical to the State sport fishing season dates.

Other Federal subsistence fisheries of the Kenai River drainage, such as the dip net and rod and reel fishery from a Federal regulatory marker near the upstream end of the fish ladder at the Russian River Falls, downstream to a Federal regulatory marker approximately 600 yards below

the Russian River falls, are defined in Federal regulation and those defined fisheries season dates will not change if this proposal is adopted. Current Federal subsistence regulations for the Kenai River drainage state "*Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations…, except as noted below* (content of regulations summary book) *or as superseded by Federal Special Action…"* and adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

The following comparison is divided by component of each proposed change of the proposed area closures and is an attempt to illustrate the impacts this proposal will have on the Federal subsistence fisheries if adopted.

For the lower portion of the Middle Section of the Kenai River drainage and Cooper Creek.

> *(1) the following waters of the Middle Section of Kenai River drainage are* ***closed to sport fishing,*** *[OPEN TO SPORT FISHING, ONLY] as follows:*
>
> > *(A) from* ***May 1 – June 10*** *[JUNE 11 – MAY 1], the Kenai River from the waters of Skilak Lake within a one-half mile radius of the Kenai River inlet, upstream to the downstream edge of the Sterling Highway Bridge at the outlet of Kenai Lake;*
> >
> > *(B) from* ***May 1 – June 10 and from September 15 – October 31, the flowing waters of*** *[JUNE 11 – SEPTEMBER 14, AND FROM NOVEMBER 1 – MAY 1,] Cooper Creek;*

Federal subsistence rod and reel fishing regulations in the referenced area at and upstream of the inlet into Skilak Lake and Cooper Creek, like the State sport fishery season, would be restricted by one day additional day (May 1).

For the Russian River Drainage area:

> *(C)* ***repealed / /2017*** *[FROM JUNE 11 – MAY 1, FLOWING WATERS OF THE RUSSIAN RIVER DRAINAGE UPSTREAM OF A POINT APPROXIMATELY 100 YARDS FROM ITS CONFLUENCE WITH THE KENAI RIVER, EXCLUDING UPPER RUSSIAN (GOAT) CREEK];*
>
> *(D)* ***repealed / /2017*** *[FROM JULY 15 – MAY 1, THE RUSSIAN RIVER SANCTUARY, INCLUDING WATERS UPSTREAM FROM ADF&G REGULATORY MARKERS LOCATED JUST DOWNSTREAM OF THE FERRY CROSSING ON THE KENAI RIVER TO ADF&G REGULATORY MARKERS LOCATED APPROXIMATELY 300 YARDS UPSTREAM OF THE PUBLIC BOAT LAUNCH AT SPORTSMANS LANDING (INCLUDING THE WATERS AROUND THE UPSTREAM END OF THE ISLAND NEAR THE RUSSIAN RIVER MOUTH) AND THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM 100 YARDS TO ADF&G REGULATORY MARKERS IS OPEN TO SPORT FISHING, EXCEPT SOCKEYE SALMON MAY BE TAKEN ONLY FROM JULY 15 – AUGUST 20];*

(E) ***repealed / /2017*** *[FROM JUNE 11 – AUGUST 20, THE WATERS OF THE KENAI RIVER NEAR THE CONFLUENCE OF THE RUSSIAN RIVER, FROM THE POWERLINE CROSSING ON THE KENAI RIVER UPSTREAM TO THE FERRY CROSSING, ARE OPEN TO SPORT FISHING FOR SOCKEYE SALMON];*

(F) ***repealed / /2017*** *[FROM JUNE 11 – AUGUST 20, THE WATERS OF THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM TO AN ADF&G REGULATORY MARKER LOCATED APPROXIMATELY 600 YARDS DOWNSTREAM FORM THE FALLS ARE OPEN SPORT FISHING FOR SOCKEYE SALMON];*

(G) from ***May 1 – June 10*** *[JUNE 11 – JULY 31], and from* ***August 1 – August 31*** *[SEPTEMBER 1 – MAY 1], the Upper Russian (Goat) Creek upstream from an ADF&G regulatory marker located approximately 300 yards from its confluence with Upper Russian Lake;*

To be mostly replaced with:

(5) ***all tributaries to the Middle Section of the Kenai River, except a section of*** *the Russian River drainage* ***downstream*** *[UPSTREAM] of an ADF&G regulatory marker located approximately 600 yards downstream from the falls* ***are*** *[IS] closed to sport fishing for salmon;*

H) from ***May 1 – June 10, the flowing waters of*** *[JUNE 11 – MAY 1] Jean Lake Creek****, Juneau Creek, the Russian River upstream of a point approximately 100 yards from its confluence with the Kenai River, excluding Upper Russian (Goat) Creek,*** *and Hidden Lake Creek;*

(I) ***repealed / /2017*** *[FROM JULY 1-SEPTEMBER 30, THE WATERS OF THE RUSSIAN RIVER FROM ITS MOUTH UPSTREAM TO AN ADF&G REGULATORY MARKER LOCATED APPROXIMATELY 600 YARDS DOWNSTREAM FORM THE FALLS ARE OPEN SPORT FISHING FOR COHO SALMON];*

5 AAC 57.122 is amended by adding a new paragraph to read:

(10) the following waters of the Middle Section of Kenai River drainage are open to sport fishing, only as follows:

(A) from July 15 – April 30, the Russian River Sanctuary, including waters upstream from ADF&G regulatory markers located just downstream of the ferry crossing on the Kenai River to ADF&G regulatory markers located approximately 300 yards upstream of the public boat launch at Sportsman's Landing (including the waters around the upstream end of the island near the Russian River mouth) and the Russian River from its mouth upstream 100 yards to ADF&G regulatory markers is open to sport fishing, except sockeye salmon may be taken only from July 15 – August 20;

(B) from June 11 – August 20, the waters of the Kenai River near the confluence of the Russian River, from the powerline crossing on the Kenai River upstream to the Ferry Crossing, are open to sport fishing for sockeye salmon;

(C) from June 11 – August 20, the waters of the Russian River from its mouth upstream to an ADF&G regulatory marker located approximately 600 yards downstream from the falls are open to sport fishing for sockeye salmon;

(D) from July 1 – September 30, the waters of the Russian River from its mouth upstream to an ADF&G regulatory marker located approximately 600 yards downstream from the falls are open to sport fishing for coho salmon.

The fishing season for the Federal subsistence rod and reel portion of the dipnet and rod and reel fishing regulations for a section of the Russian River near the falls is from June 15 through August 15. Adoption of this proposal will not impact the rod and reel portion of the dip net and rod and reel Federal subsistence fishery season length or dates with that area defined in *§____ 27(e)(10(iv)(D(1)(iii)*. The fishing season for the Federal subsistence general rod and reel fishery in the Russian River drainage will be impacted by the proposed changes by liberalizing the season dates by one day (e.g. May 1)

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the restrictive impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rationale: Adoption of this proposal will potentially adjust some Federal subsistence fisheries season dates as a result of modifying State sport fishing area closures by one day of gained or lost fishing opportunity (May 1). Adoption of this proposal will also potentially adjust some Federal subsistence fisheries season dates as a result from modifying State sport fishing area closures. Adoption of this proposal is not expected to result in changes to current effort or harvest levels in the Federal subsistence fisheries.

Though adoption of this proposal may not result in changes to the Federal subsistence fisheries as significant as requested in Proposal 76, the OSM has the same concerns expressed for Proposal 76 regarding restricting Federally qualified subsistence users without utilizing the thresholds contained in ANILCA.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request the desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 78 – 5 AAC 57.123. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Upper Section of the Kenai River Drainage Area. Align the closure start date for all the tributaries of the Upper Section of the Kenai River Drainage Area with the start dates proposed for the king salmon sanctuaries and the start dates proposed for the rainbow trout spawning closure. In addition, create the same fishing season in all the tributaries of the Upper Section of the Kenai River Drainage area.

Current Federal Regulations:

§____ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10′ N. Lat.) and a line extending south from Cape Fairfield (148°50.25′ W. Long.).*

(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(D) Residents of Hope, Cooper Landing, and Ninilchik may take only sockeye salmon through a dip net and a rod and reel fishery at one specified site on the Russian River, and sockeye, late-run Chinook, coho, and pink salmon through a dip net/rod and reel fishery at two specified sites on the Kenai River below Skilak Lake and as provided in this section. For Ninilchik residents, salmon taken in the Kasilof River Federal subsistence fish wheel, and dip net/rod and reel fishery will be included as part of each household's annual limit for the Kenai and Russian Rivers' dip net and rod and reel fishery. For both Kenai River fishing sites below Skilak Lake, incidentally caught fish may be retained for subsistence uses, except for early-run Chinook salmon (unless otherwise provided for), rainbow trout 18 inches or longer, and Dolly Varden 18 inches or longer, which must be released. For the Russian River fishing site, incidentally caught fish may be retained for subsistence uses, except for early- and late-run Chinook salmon, coho salmon, rainbow trout, and Dolly Varden, which must be released. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Harvests must be reported within 72 hours to the Federal fisheries manager upon leaving the fishing site, and permits must be returned to the manager by the due date listed on the permit. Chum salmon that are retained are to be included within the annual limit for sockeye salmon. Only residents of Cooper Landing, Hope, and Ninilchik may retain incidentally caught resident species.

(1) The household dip net and rod and reel gear fishery is limited to three sites:

(iii) At the Russian River Falls site, dip netting is allowed from a Federal regulatory marker near the upstream end of the fish ladder at Russian River Falls downstream to a Federal regulatory marker approximately 600 yards below Russian River Falls. Residents using rod and reel gear at this fishery site may not fish with bait at any time.

(2) Fishing seasons are as follows:

(i) For sockeye salmon at all fishery sites: June 15-August 15;

(ii) For late-run Chinook, pink, and coho salmon at both Kenai River fishery sites only: July 16-September 30; and

(iii) Fishing for sockeye, late-run Chinook, coho, or pink salmon will close by special action prior to regulatory end dates if the annual total harvest limit for that species is reached or superseded by Federal special action.

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

(G) For Federally managed waters of the upper Kenai River and its tributaries above Skilak Lake outlet at river mile 50, residents of Cooper Landing, Hope, and Ninilchik may take resident fish species including lake trout, rainbow trout, and Dolly Varden/Arctic char with jigging gear through the ice or rod and reel gear in open waters. Resident fish species harvested in the Kenai River drainage under the conditions of a Federal subsistence permit must be marked by removal of the dorsal fin immediately after harvest and recorded on the permit prior to leaving the fishing site. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these resident species under Alaska fishing regulations (5 AAC 56, 5 AAC 57, 5 AAC 77.54), except for the following harvest and possession limits:

(2) In flowing waters, daily harvest and possession limits for Dolly Varden/Arctic char less than 16 inches are one per day and one in possession. In lakes and ponds, daily harvest and possession limits are two per day and two in possession of which only one fish 20 inches or longer may be harvested daily.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/fisheries: Yes. Adoption of this proposal will indirectly restrict the Federal subsistence rod and reel fisheries in waters under Federal subsistence fisheries jurisdiction within the waters referenced in the proposal. The Federal subsistence rod and reel salmon fishing seasons in the Upper Kenai River and tributaries are identical to the State sport fishing season dates and adoption of this proposal will reduce the Federal subsistence fishing season by one day (May 1). Current Federal subsistence regulations for the Kenai River drainage state "*Seasons, areas (including seasonal riverbank closures), harvest and possession*

limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations…except as noted below (content of regulations summary book) *or as superseded by Federal Special Action…".* Adoption of this proposal will modify several fishing seasons for Federally qualified subsistence users.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery but **opposes** the restrictive impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rationale: Adoption of this proposal will potentially restrict Federal subsistence rod and reel fisheries season length by one day (May 1) as a result from modifying State sport fishing area closures in the Upper Kenai River drainage area. The proponent indicates the intention of the proposal is to simplify and align regulations.

Though adoption of this proposal may not result in changes to the Federal subsistence fisheries as significant as requested in Proposal 76, the OSM has the same concerns expressed for Proposals 76 and 77 regarding restricting Federally qualified subsistence users without utilizing the thresholds contained in ANILCA.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to participate in the Federal subsistence rod and reel fisheries outside of the State sport fisheries closures times may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

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.

Current Federal Regulations:

§____ 27(e)(10) Cook Inlet Area. *The Cook Inlet Area includes all waters of Alaska enclosed by a line extending east from Cape Douglas (58°51.10' N. Lat.) and a line extending south from Cape Fairfield (148°50.25' W. Long.).*

(ii) You may take fish by gear listed in this part unless restricted in this section or under the terms of a subsistence fishing permit (as may be modified by this section). For all fish that must be marked and recorded on a permit in this section, they must be marked and recorded prior to leaving the fishing site. The fishing site includes the particular Federal public waters and/or adjacent shoreline from which the fish were harvested.

(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5

AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/fisheries: Yes. Currently, Federal subsistence rod and reel fisheries regulations governing the fresh waters under Federal subsistence fisheries jurisdiction on the west side of Cook Inlet do not specify harvest and possession limits thus *§____ 27(e)(10)(iv)* states the limits will be the same as those for the Alaska sport fishing regulations. If this proposal is adopted the Coho Salmon sport fishery harvest limits in the streams on the west side of Cook Inlet are restricted based upon management actions for entirely different watersheds, Federally qualified subsistence users will be unnecessarily restricted by a 33% reduction in the daily harvest limit.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rationale: Adoption of this proposal may result in harvest limit restrictions on Federally qualified subsistence users fishing in the freshwater streams under Federal subsistence jurisdiction on the west side of Cook Inlet. The potential harvest limit reduction would be based on management actions for separate watersheds and may not be based on conservation concerns, challenges to continuance of subsistence uses, or public safety reasons for the specific streams within Federal public lands boundaries being fished by Federally qualified subsistence users. Though adoption of this proposal will not likely impact effort, participation, or harvest levels in the Federal subsistence rod and reel fisheries in the area of concern, the OSM opposes unnecessary restrictions to Federally qualifies subsistence users but is neutral on the impacts to the sport fisheries.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to retain three Coho Salmon in the Federal subsistence rod and reel fisheries may submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and submit a proposal to the Federal Subsistence Board to request desired long term changes to the harvest and possession limits for these fisheries during the fisheries proposal 2017/2018 cycle. The freshwaters under Federal subsistence jurisdiction potentially impacted by this proposal include flowing waters within the Lake Clark National Park and some of the drainage headwaters of the Susitna valley waters within the Denali National Park and Preserve.

<u>Proposal 14</u> – 5 AAC 56.122. Special provisions for the seasons, bag, possession, annual, and size limits, and methods and means for the Kenai Peninsula Area. Allow snagging for Sockeye Salmon in all Cook Inlet freshwater lakes.

Current Federal Regulations:

Current Federal subsistence fishing regulations prohibit retaining Sockeye Salmon snagged with a rod and reel in the Cook Inlet Area. Current Federal subsistence fishing regulations do authorize snagging salmon with a hand line or hook and line attached to a rod and reel in a few areas of Alaska within waters under Federal subsistence fisheries jurisdiction. The areas where

snagging is authorized are in more remote parts of the State in low participation fisheries (as compared to the more accessible Cook Inlet Area high use fisheries).

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/fisheries: Yes. If this proposal is adopted as written, some Sockeye Salmon sport fisheries in the freshwater lakes of the Cook Inlet Area may lead to conservation concerns and eventual challenges to continuance of subsistence uses. If this proposal is adopted as written, authorizing intentional snagging in the sport fisheries may increase mortality of incidentally snagged non-target fish and wounding loss in targeted species. Snagging is an indiscriminate method and means and damage to non-target species, target species outside of a legal size limits, and target species in a condition which an angler chooses not to retain (water marked etc.) may lead to high mortality rates of non-retained fish (e.g., gut hooked small fish or eye hooked in-slot Chinook Salmon), additive to conservation concerns for species under restrictive protections (above length limit trout and char), or lead to wanton waste of mortally wounded less desirable fish (jacks, heavily net marked, or fish not fit for most human consumptive practices).

Adoption of this proposal may have unintended consequences for remote lakes with diminutive Sockeye Salmon populations such as those found in some streams and lakes on the west side of Cook Inlet which are accessed by small aircraft. Small West Cook Inlet Sockeye Salmon stocks that could be impacted by this proposal and potentially comprise a conservation concern for the Crescent Lake population, which experiences notable fly-in angler pressure with sometimes up to 100 anglers per day. Potential conservation issues arise due to the relatively small population size on the spawning grounds which could be vulnerable to impact of additional snagging take or mortality due to snagging.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.

Rational: Adoption of this proposal may lead to conservation concerns for some Cook Inlet Sockeye Salmon stocks eventually leading to challenges to continuance of subsistence uses for Federally qualified subsistence users. Authorizing intentional snagging in the sport fisheries may increase mortality of incidentally snagged target and non-target fish.

PROPOSAL 159 - 5 AAC 57.120. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Kenai river Drainage Area. and 5 AAC 57.121. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Extend the time that the slot limit for Kenai River king salmon is in effect.

Current Federal Regulations:

*§_____100.27 Subsistence taking of fish***.**

(e)(10)(iv)(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

> *(1) In the Kenai River below Skilak Lake, fishing is allowed with up to two baited single or treble hooks June 15-August 31.*
>
> *(2) For early-run Chinook salmon less than 46 inches or 55 inches or longer, daily harvest and possession limits are two per day and two in possession.*
>
> *(3) For late-run Chinook salmon 20 inches and longer, daily harvest and possession limits are two per day and two in possession.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/fisheries: Yes. There are specific Federal subsistence regulations for the Chinook Salmon fishery in the Kenai River, including a 46-55 inch slot harvest limit. The Federal subsistence fishery early-run slot limit season dates of January 1 through July 14 for the rod and reel only fishery are adopted by reference from State of Alaska sport fishing regulations governing the sport fishery from the Sterling Highway Bridge in Soldotna upriver to the outlet of Skilak Lake. Separate Federal subsistence regulations for late-run Chinook Salmon harvested in the dip net and rod and reel fishery from July 16 –September 30 currently do not include a slot limit.

If this proposal is adopted as written, the slot limit for the Kenai River Chinook salmon sport fishery would be extended through July 31 which would, by default, extend the slot limit for the Federal subsistence rod and reel only fishery from July 15 through July 31, effectively creating a fishery more restrictive than in current Federal regulation. Adoption of this proposal will require the release of an unknown number of Chinook Salmon caught in both the sport and Federal subsistence fisheries. The number of Chinook Salmon released between 42 and 55 inches in length for the sport fishery and the number of Chinook Salmon released between 46 and 55 inches in length from the Federal subsistence fishery may benefit the Chinook Salmon stocks of the Kenai River at some unknown level by allowing those fish to pass through the fisheries potentially increasing spawning success of larger and more fecund fish.

Federal position/recommended action: The OSM recommendation is **neutral** on the resulting impacts this proposal may have on the sport fishery, but **opposes** the impacts adoption of this proposal will have on the Federal subsistence fisheries due to the structural Federal regulatory requirement to adopt State regulation by reference in absence of Federal regulation.

Rational: The Federal Subsistence Board adopted the current slot harvest limit regulations (46"-55") for resource conservation as advised by Federal staff and based largely on information provided by the State. The season dates for the Kenai River Chinook Salmon slot limit do not exist in Federal subsistence regulations, rather the season dates are adopted by reference from State regulations.

Increasing the Kenai River early-run Chinook Salmon slot limit season dates by extending the season through the two remaining weeks in July will impact Federally qualified subsistence users who choose to fish with a rod and reel for Chinook Salmon during that time frame. It is unknown how many Chinook Salmon between 46 and 55 inches in length would be foregone by Federally qualified subsistence users fishing for Chinook Salmon with a rod and reel if this proposal is adopted as participation in this fishery has been minimal to date.

If this proposal is adopted in part or as written, Federally qualified subsistence users who desire to harvest Chinook Salmon with a rod and reel between July 16 - 31 without a slot limit, they could choose to participate in the dip net and rod and reel fisheries within the portions of the Kenai River as authorized by Federal regulation where a slot limit does not apply. If a Federally qualified subsistence user preferred to harvest Chinook Salmon in the rod and reel only Federal subsistence fishery between July 16 - 31 without a slot limit, the user would have to submit a Fisheries Special Action Request to the Federal Subsistence Board for temporary relief from the restrictions and/or submit a proposal to the Federal Subsistence Board to request desired long term changes during the fisheries proposal 2019/2020 cycle.

PROPOSAL 178 - 5 AAC 57.121. Special provisions for the seasons, bag, possession, and size limits, and methods and means for the Lower Section of the Kenai River Drainage Area. Increase the number of days only non-motorized vessels may fish on the lower Kenai River.

Current Federal Regulations:

§_____.27(i)(10)(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

> *(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species*

under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries. Yes. Seasons, harvest and possession limits, and methods and means for take are the same as for taking of those species under Alaska sport fishing regulations (5AAC 56 and 5AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, the Kenai River would be closed to Federally-qualified subsistence users and State sport anglers an additional day each week unless they fish from a drift boat or shore. This would reduce fishing opportunities for Federally-qualified subsistence users who do not own or have access to a drift boat. Additionally, access to and participation in the Kenai River Federal subsistence dipnet fisheries at river mile 48 and at Moose Range Meadows would be severely restricted or eliminated as both require motorized vessels as a platform for efficient and effective dipnetting.

Federal position/recommended action: The OSM recommendation is to **oppose** this proposal.

Rational: The OSM supports conservation of the resource and would support this proposal if adoption was necessary to address a biological concern in waters under Federal subsistence fisheries jurisdiction. However, this proposal appears to address a social issue (crowding) rather than a biological issue. Unless a conservation concern exists, adoption of this proposal would unnecessarily reduce harvest opportunities for Federally-qualified subsistence users who do not have access to drift boats to fish within Federal public waters of the Kenai River.

If this proposal is adopted, the Federal inseason manager could submit a Special Action request to the Federal Subsistence Board to temporarily change Federal regulations (effective for a maximum of 60 days) to adjust methods and means for Federally qualified subsistence users to provide additional fishing opportunity to Federally qualified subsistence users. If the proposal is adopted, a proposal could be submitted to the Federal Subsistence Board to modify Federal subsistence fisheries regulations to allow fishing from other-than-drift boats on the listed days.

PROPOSAL 192 - 5 AAC 57.122. Special Provisions for the seasons bag, possession, and size limits, and methods and means for the Middle Section of the Kenai River Drainage Area. Shorten the Kenai River coho season by closing October 31.

Current Federal Regulations:

§_____.27(i)(10)(iv) You may take only salmon, trout, Dolly Varden, and other char under authority of a Federal subsistence fishing permit. Seasons, harvest and possession limits, and methods and means for take are the same as for the taking of those species under Alaska sport fishing regulations (5 AAC 56 and 5 AAC 57) unless modified herein. Additionally for Federally managed waters of the Kasilof and Kenai River drainages:

(E) For Federally managed waters of the Kenai River and its tributaries, in addition to the dip net and rod and reel fisheries on the Kenai and Russian rivers described under paragraph (e)(10)(iv)(D) of this section, residents of Hope, Cooper Landing, and

Ninilchik may take sockeye, Chinook, coho, pink, and chum salmon through a separate rod and reel fishery in the Kenai River drainage. Before leaving the fishing site, all retained fish must be recorded on the permit and marked by removing the dorsal fin. Permits must be returned to the Federal fisheries manager by the due date listed on the permit. Incidentally caught fish, other than salmon, are subject to regulations found in paragraphs (e)(10)(iv)(F) and (G) of this section. Seasons, areas (including seasonal riverbank closures), harvest and possession limits, and methods and means (including motor boat restrictions) for take are the same as for the taking of these salmon species under State of Alaska fishing regulations (5 AAC 56, 5 AAC 57 and 5 AAC 77.54), except for the following harvest and possession limits:

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries. Yes. Seasons, harvest and possession limits, and methods and means for take are the same as for taking of those species under Alaska sport fishing regulations (5AAC 56 and 5AAC 57) unless specifically modified in Federal regulations. If this proposal is adopted, the identified portion of the Kenai River would be closed to Federally-qualified subsistence users for Coho Salmon during the month of November. The area identified in the proposal does encompass several miles of the Kenai River which is within the Kenai National Wildlife Refuge and thus is under Federal subsistence fisheries jurisdiction.

Federal position/recommended action: The OSM recommendation is to **oppose** this proposal.

Rational: The OSM opposes this proposal because adoption of this proposal will effectively restrict Federally qualified subsistence users' opportunity to harvest Coho Salmon in the Federal subsistence fisheries of the Kenai River below Skilak Lake during the month of November. Adoption of this proposal may result in placing the administrative burden on Federally qualified subsistence users who desire to continue to fish for Coho Salmon during the month of November to submit a Special Action Request to the Federal Subsistence Board to temporarily reauthorize the fishery during November. The Federally qualified subsistence user would be further burdened by being required to submit a proposal to the Federal Subsistence Board during the next fisheries regulatory cycle to re-authorize the Federal subsistence fishery for Coho Salmon during the month of November.

PROPOSAL 279 – 5 AAC 07.365. Kuskokwim River Salmon Management Plan. Submitted by Alaska Board of Fisheries. Clarify when 4-inch mesh set gillnets may be used during the early season king salmon subsistence fishery closure.

Current Federal Regulations:

§____100.14 Relationship to State procedures and regulations.
(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§____100.27 Subsistence taking of fish.

(4)(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries. Yes. Adoption of this proposal may provide some limited early season fishing opportunities for Federally qualified subsistence users who choose to target fish other than Chinook Salmon during years when managers project the Chinook Salmon return will fall within the drainagewide escapement goal range. If this proposal is adopted and managers project the drainagewide escapement goal range will be exceeded, Federally qualified subsistence users who choose to participate in the State managed fishery will have the opportunity to fish seven days per week with the described gear.

Additionally, adoption of this proposal may result in enforcement concerns for both subsistence users and agency enforcement officers regarding the operation of a set gillnet proposed restriction prohibiting any part of the gillnet from being more than 100 feet from the ordinary high water mark.

Federal position/recommended action: The OSM recommendation is to **support** this proposal.

Rational: Adoption of this proposal will allow for some targeted subsistence harvest of species other than Chinook Salmon during the early season Chinook Salmon closure currently in State regulations. As written, the proposal limits this potential fishing opportunity to times when managers estimate the Chinook Salmon return will fall within or exceed the Kuskokwim Drainage escapement goal range. If this proposal is adopted, Federally qualified subsistence users will have opportunity to harvest other species with defined shore bound set gill nets of 4 inches stretch mesh in a manner which will reduce the incidental mortality of Chinook Salmon.

Adoption of this proposal and the resulting additional fishing opportunity will likely be beneficial to all subsistence users as long at both targeted and non-targeted species exploitation rates continue to be sustainable. If incidental mortality of Chinook Salmon becomes cumulative enough to cause concerns for the managers, both State and Federal management actions can be enacted to ensure the conservation of the resource.

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I SUPPORT THIS PROPOSAL, for the same reasons as listed below by Mr. Hollier.

PROPOSAL 140 - 5 AAC 21.331. Gillnet specifications and operations. Allow a set gillnet to be up to 45 fathoms in length and a Commercial Fisheries Entry Commission limited entry permit holder to operate up to 135 fathoms of set gillnet gear when commercial fishing with set gillnets 29 meshes or less in depth, as follows:

5 AAC 21.3311 (d) (x)

A set gillnet that is no more that 29 meshes deep, can be up to 45 fathoms long. The total aggregate, for one set net permit, can be no more that 135 fathoms for these voluntarily fished nets.

What is the issue you would like the board to address and why? The issue here is how to minimize late-run Kenai River king salmon harvest, while maximizing sockeye salmon harvest in the commercial set net fishery, in the Upper Subdistrict

In the Kenai River late-Run Sockeye Salmon Management Plan (KRLRSSMP). (a) The department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial use. The department shall also mange the commercial fishery to minimize the harvest ...., late-run Kenai River king,....

Satisfying these two main objectives in the KRLRSSMP by the department, sometimes is very challenging, to say the least.

The 2013 KINTAMA study in Cook Inlet, indicated that king salmon swim at an average depth of 16 ft. Sockeye salmon swim at an average depth of 6 ft.

There are some setnetters in Cook Inlet who voluntarily fish 29 mesh deep gear. They do so to MINIMIZE king harvest, while still being economically viable catching sockeye. 29 mesh deep nets hang about 12 ft. deep at slack tide. A 45 mesh deep net hangs about 18 ft. at slack tide.

Many setnetters are very reluctant to change to shallow gear, for a variety of reasons. Setnetters by regulation should not be mandated to fish 29 mesh deep gear.

A very viable solution to persuade setnetters to VOLUNTARILY fish 29 mesh deep gear, would be to increase the length of those nets to 45 fathoms. At this length and depth of the nets, there would be still 17% less gear in the water, than the current regulation.

I believe a regulation like this in the KRLRSSMP would certainly meet the intent of 5 ACC 21.360 (a), to commercially harvest sockeye while helping minimizing king harvest.

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I Support Proposal 136, for all the resons listed below as outlined by MR. Hollier, although I fish outside of the 600 ft. area listed, I believe it to be a good proposal to help manage the Kasilof Area.

PROPOSAL 136 – 5 AAC 21.310. Fishing Seasons. Allow commercial fishing with set gillnets in the North Kalifonsky Beach (NKB), statistical area 244-32, within 660 feet of shore with shallow nets only, when the Kasilof Section is open, on or after July 8, as follows:

NKB, MAY have the opportunity to harvest with SELECT gear, (4 3/4 in maximum mesh size and can't be more than 29 meshes deep), from July 8 on, when any portion of the Kasilof section is fishing. The set nets fished on NKB, cannot fish farther than 600 ft from the mean high tide mark.

Fishing within 600 ft, from mean high tide, using SELECT gear, with 29 mesh deep nets would make the king salmon harvest minimal. Additionally using, 4 3/4 in mesh or smaller, would be very efficient in harvesting Kasilof sockeye that are abundant on the beach, and those smaller size fish that make up 61% of the Kasilof River escapement. It is these two ocean and younger age classes that continually drive the Kasilof River over the top end of its BEG.

By fishing NKB, with SELECT gear, should cut down on the amount of time fished in the KRSHA.

The regulation would read something like this:

From July 8 on, when any portion of the Kasilof section is fishing; North Kalifonsky Beach, stat area 244-32, MAY open with set gill nets, restricted to fishing within 600 ft from the mean high tide mark. Nets cannot be more than 29 meshes deep and the mesh size cannot exceed 4 3/4 in.

What is the issue you would like the board to address and why? The issue here is lack of traditional and historic harvest of Kasilof sockeye on North Kalifonsky Beach (NKB), statistical area 244-32.

NKB since before Statehood was a traditional and historic harvester of Kasilof sockeye. With management changes that went into place in 1999, the opportunity to harvest Kasilof stocks were greatly diminished for NKB.

ADF&G staff has stated that Kasilof sockeye are predominately "beach orientated". The ESSN fishery catches 58% of the Kasilof harvest, while the Drift fleet harvests 27%.

A 2009 report from ADF&G- *Genetic Stock Identification of Upper Cook Inlet Sockeye Salmon Harvest,* showed that the harvest of Kenai and Kasilof sockeye on all NKB was close to a 50/50 split between the two stocks, (page 52). This study was taken from samples of the entire NKB section. If samples were taken only from nets fishing 600 ft of mean high tide, Kasilof sockeye that are predominately " beach orientated", the Kasilof sockeye proportion would be undoubtedly higher.

From 1979 to 1999, the Kasilof River exceeded its BEG 12 out of 21 years, (57% of the time). During some of this time period the Kasilof River escapement goal was considerable less, 75,000 to 150,000 sockeye. During this time NKB was a traditional and historic harvester of Kasilof sockeye.

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PROPOSAL 165 - 5 AAC 21.359. Kenai River Late-Run King Salmon Management Plan.

SUPPORT THIS PROPOSAL, For the same reasons as listed below by Mr. Hollier.

Decrease the trigger for management actions on Kenai River late-run king salmon from 22,500 to 16,500, as follows:

I would like to see (f) be deleted from the plan, but I don't think this will happen, therefore:

To err on the side of conservation, I would like the 22,500 number of projected king salmon escapement lowered to 16,500 in this regulation (f).

The regulation would read something like this:

(f) From August 1 through August 15, if the projected escapement of king salmon into the Kenai River is at least **15,000, but less than 16,500** [16,500, but less than 22,500], notwithstanding ...

What is the issue you would like the board to address and why? In the Kenai River Late-Run King Salmon Management Plan (KRLRKSMP) the sustainable escapement goal (SEG) is 15,000- 30,000 king salmon. The mid point of the SEG is 22,500 king salmon. From August 1 through August 15 if the projected escapement of king salmon into the Kenai River is less than 22,500, the Upper Subdistrict set gillnet fishery can fish no more than 36 hours.

22,500 kings is far to liberal. There is no biological reason or data, that can justify for this number. 22,500 puts unnecessary restrictions on the ESSN fishery. In the Kenai-East Forelands sections, where in some years up to 25% of their harvest can occur in August, the current regulation is very devastating.

If 15,000 is the minimum goal, and the minimum escapement goal is projected, why are there any time restrictions put on the set net fleet?

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2/9/2017 8:51:52 PM
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My name is Chris Shaffer, and I represent the Pautzke Bait Company. Many know Pautzke Bait Company as the business that produces the green covered jars of bright red salmon eggs know as Balls O' Fire. In addition to those salmon eggs, frequently used by trout anglers, Pautzke Bait Company also sells salmon roe, bait cures for fresh salmon roe, bait dyes, and scent frequently used by sport salmon anglers. Pautzke Bait Company both purchases salmon roe from the commercial fishing industry and sells bait and bait products primarily to the sport fishing industry.

Pautzke Bait is concerned about decreasing opportunities for sport anglers to use bait and bait products when fishing for Upper Cook Inlet's abundant salmon resources. Bait restrictions adopted by the Alaska Board of Fisheries and emergency bait restrictions implemented inseason by the Alaska Department of Fish and Game take an unreasonably large share of potential bait and bait product sales from our business. Consider for example, what has happened in the Northern Cook Inlet Management Area-- before 1996 bait use was allowed in all or nearly all of the Northern Cook Inlet freshwater king salmon sport fisheries. This past year during the May 1-- July 13 bait use for ocean-run king salmon in the management area was only allowed at the hatchery produced Eklutna Tailrace fishery, the Deshka River starting on June 1, and at Little Susitna River (but only form July 6 -- 13).

The 2016 sport fishery for coho salmon on the Little Susitna River in the Northern Management Area saw a bait restriction for the entire time after the king salmon fishery closed on July 14 through December 31. No legal opportunity for sport anglers to fish for salmon with even a single salmon egg in the Little Susitna River -- yet at the same time commercial gill netting was allowed within one mile of the Little Susitna River mouth through August 15. If there are not enough coho salmon to allow even the use of one single salmon egg for sport anglers, then there should not be enough salmon to allow commercial fishing within one mile of the river mouth.

Even at locations in the Northern Management Area where bait was still allowed during the 2016 coho salmon season , because of an extreme shortage of coho salmon allowed into the streams sport coho catch and harvest were much lower than average. At the same time, the Northern District commercial fishery was allowed to harvest close to their average annual 10 year take of coho salmon -- even though these fish, by management plan are designated by the Board to be managed primarily for the sport and guided sport users.

At Jim Creek, the coho shortage was so severe that the Department of Fish and Game entirely closed the sport fishery inseason by emergency order, and only 108 coho were counted at the McRoberts Creek index area -- less than 1/4 of the escapement rage minimum of 450 coho spawners.

In short, Pautzke Bait Company requests a more reasonable sharing of the Northern Cook Inlet coho salmon resource, that better meets the needs to sustain coho salmon sport fisheries and coho salmon sport harvests for the thousands of sport anglers who participate and who purchase Alaska fishing licenses that support the management of this fishery. Anytime commercial opportunity is provided in August for Northern Cook Inlet coho salmon, bait fishing opportunity should also be provided on the larger sport fisheries in the area including both Little Susitna River and Jim Creek.

Pautzke Bait Company therefore supports Proposal 215 which would recognize the significance of the Little Susitna River king salmon and coho salmon sport fisheries and establish a one-statue-mile closed waters radius from where the mouth of Little Susitna River meets Knik Arm. Similar to such closed water around most other steams with significant salmon production in Upper Cook Inlet, these waters would be closed to commercial fishing inorder to allow staging king salmon and coho salmon a more realistic opportunity to migrate upstream. This is the best option which could allow sport anglers a more realistic annual opportunity to use bait while fishing the Little

Susitna River for salmon. It should be mentioned that Little Susitna River anglers are already shouldering a significant portion of king salmon and coho salmon conservation burden through board established regulations that do not allow any bait fishing during king salmon season (unless king salmon escapement goals can be projected beyond the upper range of the goal) and only allow bait fishing form August 6 - September 30 during coho season.

Pautzke Bait Company also supports Proposal 92, Proposal 93, and Proposal 95 which would require the Central District Drift Gillnet fishery to fish in a more stock selective manner during August and allow the passage of more coho salmon through to Northern Cook Inlet waters -- both to provide a better opportunity to meet escapement goals and to provide reasonable opportunity for Northern Management Area coho salmon sport fisheries. Such changes, if adopted by the Board, would better align the fishery to goals stated in the Central District Drift Gillnet Fishery Management Plan -- and the plan would still allow the use of emergency order fishing time in the event of an unusually large late sockeye salmon return. Such changes as offered by these 3 proposals would also more closely follow guidelines of 5 AAC 39.222 Policy for the Management of Sustainable Salmon Fisheries.

Finally Pautzke Bait Company supports proposal 212 which would close the Northern District commercial set net fishery after August 15. Currently the Northern District set net fishery harvests significantly more coho salmon per delivery than any other commercial user group in Upper Cook Inlet. It is understandable that the Northern District set net fishery will harvest some coho salmon while fishing during times of sockeye, pink, and chum salmon abundance. After August 15, however, the numbers of these salmon, managed primarily for commercial use, declines significantly, and coho salmon can dominate Northern District commercial harvests.

Such a change in regulation as suggested in proposal 212 would more closely align salmon management with preamble language of 5AAC 21.353 Northern District Salmon Management Plan. The first stated purpose of the plan is to, "minimize the harvest of coho salmon bound for the Northern District of Upper Cook Inlet." The Plan further directs, "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 fishermen a reasonable opportunity to harvest these salmon resources over the entire run as measured by the frequency of inseason restrictions, or as specified in this section or other regulations."

Minimizing commercial Northern District coho harvest by a commercial closure after August 15, rather than earlier in the season, would allow continued commercial harvest at a time when sockeye, chum, and pink are in better condition and larger abundance. If the Board allowed additional salmon to pass through the Central District Conservation Corridor in early August, likely any reduction in Northern District coho harvest after August 15, would more than be made up for with increased harvest of all salmon species during the first two weeks of August. Such a change would increase the chances of attaining adequate Northern District coho salmon escapement goals, and also allow a better late-season opportunity for reasonable sport coho harvests. It could also allow a more consistent bait fishing opportunity for salmon anglers fishing the Little Susitna River and Jim Creek.

Thank you, Board Members, for considering the concerns of Pautzke Bait Company when adopting regulations for Upper Cook Inlet salmon fisheries.

Sincerely

Pautzke Bait Company

Submitted By
Penny Johnson
Submitted On
2/7/2017 2:29:28 PM
Affiliation

I'm neither a commercial fisher or a dipnetter. But, I think it's important to consider the issue of waste that happens in both of these fishery events. There is a frenzied, greedy effect with the dipnetting. I've seen it. I would like to ask if people consider there may be much waste from thousands of freezer cleanouts at the end of each winter. Then I also wonder if there's an equivalent with the commercial fishery when it reaches retail. Then, I'd like to ask if people understand that if they don't self-regulate, then the government will do it for them; much to their dissatisfaction, no doubt. It's akin to parents saying "now, children, you must share - and the kids are destroying whatever it is they're fighting over". Let's not let that happen, or there won't be anything for anyone. This truly is the issue at hand.