

PROPOSAL 169

5 AAC 39.223. Policy for statewide salmon escapement goals.

Repeal and readopt the *Policy for Statewide Salmon Escapement Goals*, as follows:

5 AAC 39.223 Policy for statewide salmon escapement goals (a) Escapement goals have been the mainstay of salmon management since long before statehood. These goals are set to achieve Maximum Sustained Yield (MSY) whenever possible, which results in escapements that are orders of magnitude (10X or higher) more than needed to sustain these salmon runs. The goal of this policy is to maximize yields for stocks with sufficient information (spawner-recruit) and to use methods developed by Willette and Yanetz as a proxy for MSY for stocks without sufficient information (escapement only). The purpose of this policy is to establish the concepts, criteria, and procedures for establishing and modifying salmon escapement goals. The department will publish an escapement goal report for each area as it comes before the board during its regular meeting cycle. This report for each management area will be published by January 10th, three months prior to the proposal deadline. This report will contain a scientific analysis with supporting data for all escapement goals and management targets within the management area, along with the department's recommendation for the goal.

(b) The department will develop a biological escapement goals (BEG) for all important salmon stocks for which the department can enumerate salmon escapement levels, as well as total annual returns. This goal will be established with a range of 90 percent of the MSY value on both sides of MSY regardless of data quality. This will be the goal the department manages the fisheries to achieve. Important stocks are generally the larger stocks of salmon within the management area that the department actively manages with emergency orders, collects in-season data on harvest, age composition and escapements.

(c) The department will develop a management target (MT) for those salmon stocks in need of in-season management for which the department has collected only escapement information. These stocks are generally less important than stocks for which an escapement goal has been established or are harvested in mixed stock fisheries where it is not cost effective or necessary to determine harvests by stock. These management target stocks will not be used as an index to the health or size of the return of other stocks of the same or different species since the harvest is unknown. The department will follow the guidelines set out in Fisheries Manuscript No. 14-06, An evaluation of the Percentile Approach for Establishing Sustainable Escapement Goals in Lieu of Stock Productivity Information by Clark et.al. when evaluating or setting these management targets without consideration of the allocative impacts.

(d) The board after public input during the regular board meeting will approve or may recommend changes to the department's report and goals or targets if warranted.

(e) Unless the context requires otherwise, the terms used in this section have the same meaning given those terms in 5 AAC 39.222(f).

What is the issue you would like the board to address and why? The Policy for statewide salmon escapement goals, 5 AAC 39.223 is not serving the fishing public or the state very well and needs to be rewritten and simplified. The current policy allows the department to submit an

escapement goal report just days before a BoF meeting, months after proposals are due, which subverts the entire public process and does not give any one enough time to review the escapement goals the department is proposing, what methods were used or have them reviewed by other experts. Additionally the policy gives the department way too much discretion in establishing goals which has lead to the insertion of unknown “allocation” being added to escapement goals which is entirely illegal and outside of the department’s authority. This was admitted to by an ADF&G Chief Fishery Scientist at the most recent Cordova meeting for Copper River. The results of these actions can be seen on the figure on page 66 of FMS 17-02, Spawner-Recruit Analyses and Escapement Goal Recommendations for Kenai River Chinook Salmon, where all goals are shifted to the right, to much larger escapements than is necessary or prudent, sometimes by as much as 100 percent. Ironically the board and department have deigned numerous petitions and ACR’s alleging this very thing in recent years. While these huge escapements may result in better in-river fishing in some years it leads to numerous restrictions and closures of all fisheries in order to pay for these inflated goals. The Deshka River Chinook return is a perfect example of this mismanagement, in 2018 yet another year of closures and restrictions announced prior to the first fish showing up and an overall return per spawner of 0.27 or one fish returning for every four that escape. The documented waste of salmon and lost fishing time for all participants is staggering, and this is for stocks with good spawner-recruit data, no telling what problems are associated with SEG’s and OEG’s which should both be done away with and replaced with a management target. In no case should the Board or department trade away yield of any species in favor of allocation.

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