Howard Delo's Comments on Proposal 205 RC 37

I am resubmitting my proposal 205 in its entirety since the version printed in the BOF proposal book has had all the supporting data on which the proposal is based removed from the proposal listing. With this RC, you can view the data and see where it came from to realize how badly unbalanced the "minimize" concept has become in the Northern District Salmon Management Plan.

In the original proposal, I showed, using ADF&G data, why I am asking for a specific definition of the word "minimize." However, I didn't make a specific recommendation of what that definition should look like. Having given the definition some further thought, I would like to make some specific suggestions.

First, after July 31, no commercial drift fishing can occur outside the expanded harvest zones on the East Side of Cook Inlet – no fishing in the center of the Inlet in the area referred to as the Conservation Corridor. This is to reduce interception of mixed stock and mixed species fish moving north toward their natal streams.

Second, when the species of salmon expected to be in the greatest numbers during a fishing period in an area outside the expanded harvest zones is other than sockeye, chum, or pink, the scheduled commercial drift fishing period shall be reduced to six hours.

Third, if in-river Coho sport fishing is restricted during the season for lack of fish or concerns of failing to make escapement goals, then commercial drift fishing for Coho salmon shall be closed until a projection of sufficient numbers to make escapement goals is determined.

ALASKA BOARD OF FISHERIES
Regulation Proposal Form 2019-2020
Proposals must be received Wednesday, April 10, 2019
PO BOX 115526, JUNEAU, ALASKA 99811-5526 or FAX (907) 465-6094 or E-MAIL
dfg.bof.comments@alaska.gov

BOARD OF FISHERIES REGULATIONS

☐ Subsistence ☐ Personal Use ☒ Sport ☐ Commercial

***Which meeting would you like to submit your proposal to?**

☐ Lower Cook Inlet Finfish ☒ Upper Cook Inlet Finfish

☐ Kodiak Finfish ☐ Statewide King and Tanner Crab

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.

1. Alaska Administrative Code Number: 5 AAC 21. 358 Northern District Salmon Management Plan

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

When the Board of Fisheries developed this plan, they included purpose and direction for ADF&G to follow when managing under this plan. The plan starts, "(a) The purposes of this management plan are to minimize the harvest of Coho salmon bound for the Northern District of upper Cook Inlet and to provide the department direction for management of salmon stocks...The department shall 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 inriver restriction...."

The term "minimize" has never been defined in regulation. Over the last ten years, using available data from Fish and Game (2008 to 2017) which I have attached, the Central District commercial drift fishery has harvested more Coho bound for the Northern District than the entire Northern District sport catch in eight of the last ten years. At the 2017 UCI meeting, I was personally told by the Soldotna commercial fisheries management biologist that 95% of all Coho salmon harvested by the drift fleet had been shown by genetic sampling to be northern-bound silvers. If the Northern District commercial set net fishery is included, then the commercial fishery has harvested significantly higher numbers of Coho Salmon in all ten years. How is this "minimizing" the commercial harvest of northern-bound Coho?

The commercial data comes from Fisheries Management Report No. 18-10, Upper Cook Inlet Commercial Fisheries Annual Management Report, 2017, by Pat Shields and Alyssa Frothingham.

The sportfishing data comes from Alaska Sport Fishing Survey database [Internet]. 1996--. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish (cited April 7, 2019).

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

I would like to see the BOF specifically define what is meant by the term "minimize." This could take the form of a specified percentage of the harvestable surplus or it could be a specific cap number based on the five-year average of sport harvested silvers in the Northern

District or, perhaps, more specific restrictions on time and area for the commercial fishery than currently exist. I don't have a specific methodology in mind other than having a specific definition as guidance for ADF&G to manage to.

When the commercial drift fleet harvests 191,490 silvers, as they did in 2017 and the entire Northern District sport harvest was 47,706, it doesn't appear that any "minimization" of the commercial harvest is occurring.

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**Indicates a required field*

Alaska Department of Fish and Game

Southcentral Alaska Region

Region: Southcentral Alaska

Select the desired regional estimates summary or choose a survey area in Southcentral Alaska to obtain detailed estimates data.

Regional Effort Summary

2008-2017

Number of days fished

Get Data >

Regional Species Summary

2008-2017

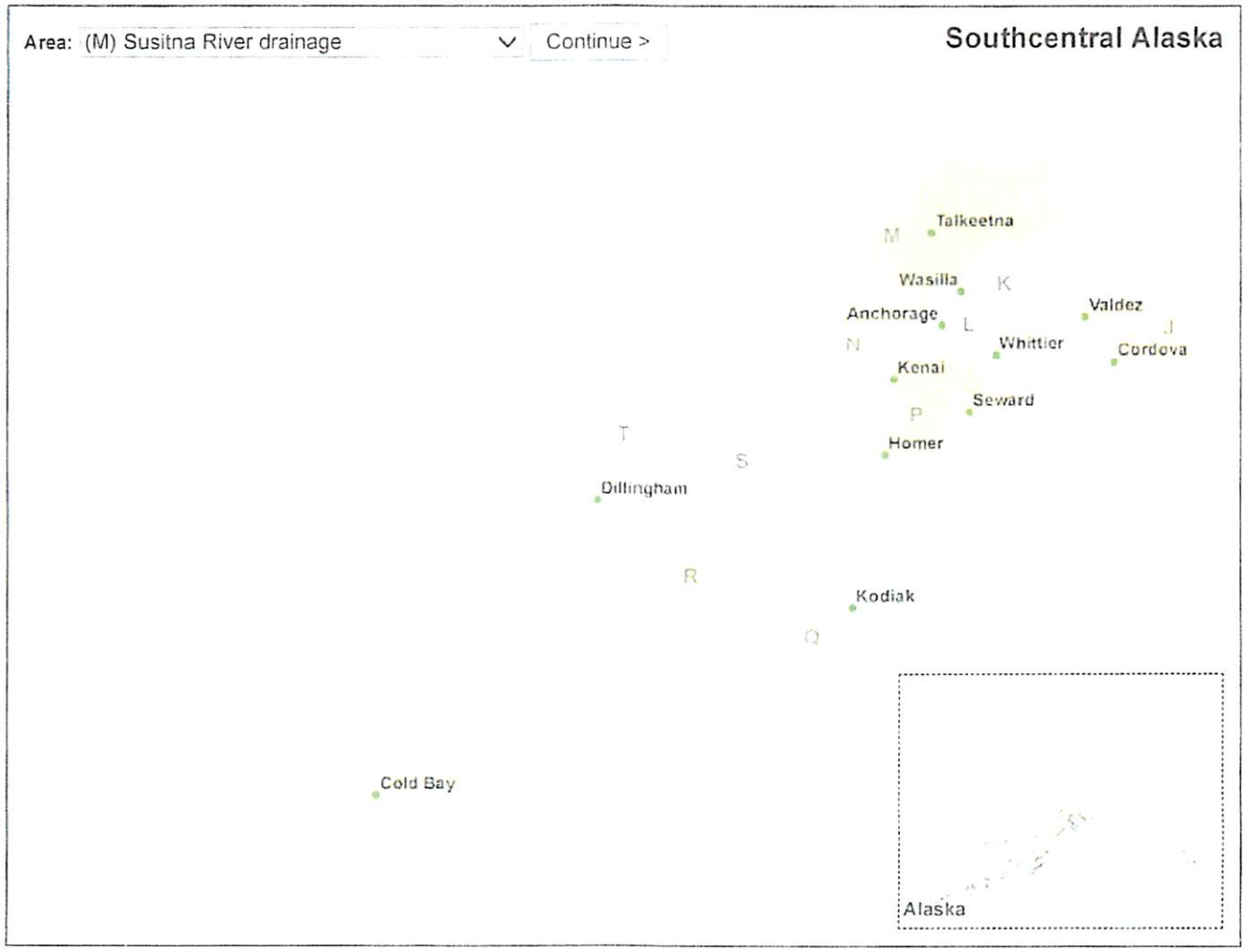
Salmon, Silver

All Watertypes Saltwater Only Freshwater Only

Harvest Catch

Get Data >

Area: (M) Susitna River drainage Continue >



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Alaska Sport Fishing Survey harvest data for all water types for Southcentral Region, survey areas K, L, M, and N for Coho salmon for the years 2008 to 2017.

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
K	35996	37380	26369	8484	5014	12335	16180	17800	7962	6232
L	17996	10805	4466	7405	4187	6190	9430	15099	5069	13049
M	41708	31193	30327	21806	17063	25594	25654	29234	9921	23597
N	14673	9801	9030	6292	7813	7698	7320	12849	6015	4828
	110373	89179	70192	43987	34077	51817	58584	74982	28967	47706

K: Knik survey area
L: Anchorage survey area
M: Susitna River Drainage survey area
N: West Cook Inlet Drainage survey area

Data from: Alaska Sport Fishing Survey database [Internet]. 1996-- . Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish (cited April 7, 2019).

Fishery Management Report No. 18-10

Upper Cook Inlet Commercial Fisheries Annual Management Report, 2017

by

Pat Shields

and

Alyssa Frothingham

May 2018

Alaska Department of Fish and Game

Divisions of Sport Fish and Commercial Fisheries

Appendix B3.–Upper Cook Inlet commercial coho salmon harvest by gear type and area, 1966–2017.

	Central District						Northern District		
	Drift Gillnet		Upper Subdistrict Set		Kalgin/West Side Set		Set Gillnet		
Year	Number[b]	%	Number[b]	%	Number[b]	%	Number[b]	%	Total
1966	80,901	27.9	68,877	23.8	59,509	20.5	80,550	27.8	289,837
1967	53,071	29.9	40,738	22.9	40,066	22.5	43,854	24.7	177,729
1968	167,383	35.8	80,828	17.3	63,301	13.5	156,648	33.5	468,160
1969	33,053	32.8	18,988	18.9	28,231	28.0	20,412	20.3	100,684
1970	110,070	40.0	30,114	10.9	52,299	19.0	82,722	30.1	275,205
1971	35,491	35.4	16,589	16.5	26,188	26.1	22,094	22.0	100,362
1972	21,577	26.7	24,673	30.5	15,300	18.9	19,346	23.9	80,896
1973	31,784	30.4	23,901	22.9	24,784	23.7	23,951	22.9	104,420
1974	75,640	37.8	36,837	18.4	40,610	20.3	47,038	23.5	200,125
1975	88,579	39.0	46,209	20.3	59,537	26.2	33,051	14.5	227,376
1976	80,712	38.7	47,873	22.9	42,243	20.2	37,835	18.1	208,663
1977	110,184	57.2	23,693	12.3	38,093	19.8	20,623	10.7	192,593
1978	76,259	34.8	34,134	15.6	61,711	28.2	47,089	21.5	219,193
1979	114,496	43.2	29,284	11.0	68,306	25.8	53,078	20.0	265,164
1980	89,510	33.0	40,281	14.8	51,527	19.0	90,098	33.2	271,416
1981	226,366	46.7	36,024	7.4	88,390	18.2	133,625	27.6	484,405
1982	416,274	52.5	108,393	13.7	182,205	23.0	85,352	10.8	792,224
1983	326,965	63.3	37,694	7.3	97,796	18.9	53,867	10.4	516,322
1984	213,423	47.4	37,166	8.3	84,618	18.8	114,786	25.5	449,993
1985	357,388	53.6	70,657	10.6	147,331	22.1	91,837	13.8	667,213
1986	506,818	66.9	76,495	10.1	85,932	11.4	88,108	11.6	757,353
1987	202,506	44.8	74,981	16.6	75,201	16.6	97,062	21.9	449,750
1988	278,828	49.6	54,975	9.9	77,503	13.8	149,742	26.7	561,048
1989	856	0.2	82,333	24.1	81,004	23.9	175,738	51.8	339,931
1990	247,453	49.3	40,351	8.0	73,429	14.6	140,506	28.0	501,739
1991	176,245	41.2	30,436	7.1	87,515	20.6	132,302	31.0	426,498
1992	267,300	57.0	57,078	12.2	53,419	11.4	91,133	19.4	468,930

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	Central District						Northern District		
	Drift Gillnet		Upper Subdistrict Set		Kalgin/West Side Set		Set Gillnet		
Year	Number[b]	%	Number[b]	%	Number[b]	%	Number[b]	%	Total
1993	121,829	39.7	43,098	14.0	35,661	11.6	106,294	34.6	306,882
1994	310,114	52.7	68,449	11.9	61,166	10.5	144,064	24.8	583,793
1995	241,473	54.0	44,751	10.0	71,606	16.0	89,300	20.0	447,130
1996	171,434	53.3	40,724	12.6	31,405	9.8	78,105	24.3	321,668
1997	78,666	51.6	19,668	12.9	16,705	11.0	37,369	24.5	152,408
1998	83,338	51.9	18,677	11.6	24,286	15.1	34,387	21.4	160,688
1999	64,814	51.5	11,923	9.3	17,725	14.1	31,643	25.1	126,105
2000	131,478	55.5	11,078	4.7	22,840	9.6	71,475	30.2	236,871
2001	39,418	34.8	4,246	3.7	23,719	20.9	45,928	40.5	113,311
2002	125,831	51.1	35,153	14.3	35,005	14.2	50,292	20.4	246,281
2003	52,432	51.5	10,171	10.0	15,138	14.9	24,015	23.6	101,756
2004	199,587	64.2	30,154	9.7	36,498	11.7	44,819	14.4	311,058
2005	144,753	64.4	19,543	8.7	29,502	13.1	30,859	13.7	224,657
2006	98,473	55.4	22,167	12.5	36,845	20.7	20,368	11.5	177,853
2007	108,703	61.3	23,610	13.3	23,495	13.2	21,531	12.1	177,339
2008	89,428	52.0	21,823	12.7	18,441	10.7	42,177	24.5	171,869
2009	82,096	53.6	11,435	7.5	22,050	14.4	37,629	24.6	153,210
2010	110,275	53.2	32,683	15.8	26,281	12.7	38,111	18.4	207,350
2011	40,858	42.9	15,560	16.3	16,760	17.6	22,113	23.2	95,291
2012	74,678	69.9	6,537	6.1	12,354	11.6	13,206	12.4	106,775
2013	184,771	70.8	2,266	0.9	31,513	12.1	42,413	16.3	260,963
2014	76,932	56.0	5,908	4.3	19,379	14.1	35,200	25.6	137,419
2015	130,720	60.5	17,948	8.3	20,748	9.6	46,616	21.6	216,032
2016	90,242	61.2	11,606	7.9	15,171	10.3	30,476	20.7	147,495
2017	191,490	63.1	29,916	9.9	29,535	9.7	52,701	17.4	303,642
1966-16 Avg[a]	144,812	48.6	34,329	12.6	47,787	16.8	61,902	22.0	288,830
2007-16 Avg	98,870	58.1	14,938	9.3	20,619	12.6	32,947	19.9	167,374

Note: Harvest data prior to 2017 reflect minor adjustments to historical catch database.

[a] 1989 not used in average because the drift fleet did not fish due to the Exxon Valdez oil spill; this had an effect on all other fisheries.