<u>PROPOSAL 6</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. Extend the fishing season for Anchor River, Deep Creek, Ninilchik River, and Stariski Creek from October 31 through November 30, as follows:

Amend 5 AAC 56.122(a)(2), (5), (6), and (10) to change the season closing date for Anchor River, Deep Creek, Ninilchik River and Stariski Creek from October 31 to November 30.

What is the issue you would like the board to address and why? Provide more opportunity for steelhead fishing on Anchor River, Deep Creek, Ninilchik River and Stariski Creek. Fishing pressure is very light by late October. Although these waters often freeze up by early November,

they sometimes remain unfrozen into December. Until a few years ago, the season had remained open until December 31. Then, as I recall, ADF&G became concerned about late season mortality in these catch-and-release fisheries and recommended the closing date be October 31, which the Board adopted. However, the biological justification for doing so seemed weak at the time. In recent years, the steelhead have been running late, and no harm would occur from a slightly longer season. I was on the steelhead planning team for ADF&G in the 1990's which recommended catch-and-release for the steelhead fisheries on these streams and wild stock management, which the Board adopted. At that time the closing date was never an issue. I would like to see the Board review the science to either justify the current closing date or revise it to November 30, in light of the fact that the pressure is very light by the latter part of October and in some years the fish have seemed to be running late.

<u>PROPOSAL 7</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. Extend the fishing season on Anchor River, Deep Creek, Ninilchik River, Stariski Creek through November 15, as follows:

All season ending dates related to the Anchor River, Deep Creek, Ninilchik River, Stariski Creek changed from October 31st to November 15th as the last day you can fish. Example under Deep Creek Drainage currently states "Closed to all fishing from November 1st-May 15th" change to November 16th-May 15th"

What is the issue you would like the board to address and why? Extend the fishing season on the Anchor River, Deep Creek, Ninilchik River, and Stariski Creek for other species other than salmon from a closing date of November 1st to November 15th. Basically extend the season 2 weeks. The primary species targeted during this time frame are Steelhead and Dolly Varden. Historically the season had been open thru November 30th. The last Board cycle changed the season to the current regulation closing these rivers to all fishing on October 31st. The reasoning behind the change was to reduce pressure and stress on Steelhead during what is thought to be low water conditions and extremely cold tempertures during the month of November.

To my knowledge there hasn't been any biological studies on the Lower Kenai Peninsula streams related to Steelhead catch and release mortality and water temperatures to support this regulation. The fishery is already heavily restricted single hook, no bait and 100% catch and release in addition to non removal of fish out of the water. In addition anglers participating in the fishery are very self-policing and some of the most ethical anglers you will see on Alaska waterways. Whether its global warming or other unknown environmental factors it has become a noticeable later freeze up on these rivers. In the past few seasons the month of November has been mild and conditions have not warranted the October 31st closure this can be supported by weather records and water temperatures recorded by the USGS stream gauge located on the Anchor River. Fish and Game would still have the authority to close the fishery by Emergency Order at any time if conditions warrant it.

Additionally these stocks are not a concern of depletion/sustainability. If the department of Fish and Game was truely concerned about the status of Steelhead in these streams and or were concerned about about there vulnerability current regulations would reflect that. Historically the legal use of bait and multiple hooks during King Salmon season during late may and early June coincides with the outmigration of Steelhead to the saltwater after spawning. Incidental Steelhead mortality due to bait, multiple hooks, and poor catch and release tactics can run quite high during the King Salmon seasons due to the poor condition the Steelhead kelts are in due to spawning and being in the river all winter. (Should be noted that bait and multiple hooks were not allowed last few years by emergency order due to low King Salmon numbers, however as King Salmon rebound bait and multiple hooks will be allowed.) Additionally bait and multiple hooks are allowed during the month of August to target Silver Salmon however Steelhead are present and caught at this time as well. In short one day of bait fishing for King Salmon will kill more Steelhead than the additional 2 weeks of catch and release in November.

Who will benefit: resident and non-resident anglers, all businesses from Girdwood to Homer especially those in the Anchor Pt. and Ninilchik area from an additional 2 weeks of anglers spending money in the communities. State of Alaska: more revenue from fishing licence sales and state park camping and parking fees. Kenai River anglers and fisheries will not see as much pressure and crowded conditions from November 1-15th due to increased opportunities elsewhere.

Negative impacts: additional dolly varden char will be harvest in this fishery, and an unknown amount of Steelhead mortality will occur due to catch and release during these 2 weeks.

If nothing is done than angler opportunity will continue to have been unnecessarily taken away from resident and non-resident anglers to enjoy that was not based on sound science. Local economies, businessses and the State of Alaska will continue to lose out on additional revenues.

PROPOSED BY: Jon Madison	(EF-F16-005)
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<u>PROPOSAL 8</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. Extend the start date for king salmon fishery on the Ninilchik from July 1 to June 16, as follows:

Because of the large increase in the numbers of hatchery King Salmon being released in the Ninilchik River, move the opening day of the regular hatchery King Salmon opening from July 1st to June 16th, to allow increased opportunity to harvest these fish, while they are available, and in prime condition.

What is the issue you would like the board to address and why? Recently, the Alaska Department of Fish and Game has significantly increased the number of King Salmon fingerlings being released into the Ninilchik River, and would like to see an increased opportunity to harvest these fish when they return as adults. The current regulations on the Ninilchik River allow fishing for King Salmon for just three 3-day weekends, starting on Memorial weekend. After that last 3-day weekend, the Ninilchik River remains closed for up to 22 days until July 1st, depending on

where Memorial weekend falls on the calendar each year. On July 1st, the Ninilchik River reopens for hatchery King Salmon fishing only, on a daily basis.

This long closure in June is a lost opportunity to harvest hatchery King Salmon on the Ninilchik River, when they are in prime condition, and within reach of the two mile fishing limit marker on that river. In June of 2015, the Ninilchik River was only open for King Salmon fishing for 4 days, and in June of 2016, it is scheduled to open for 6 days.

<u>PROPOSAL 9</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. Increase the bag limit for king salmon on the Ninilchik River to 2 per day, only 1 may be wild, as follows:

Go back to the daily bag limit for King Salmon over 20" on the Ninilchik River, as it was prior to 2014, allowing the harvest of 2 King Salmon per day, where just 1 fish could be a wild King Salmon. After taking this daily bag limit, a person may not fish for any species on that same day.

What is the issue you would like the board to address and why? Recently, the Alaska Department of Fish and Game has significantly increased the number of King Salmon fingerlings being released into the Ninilchik River, and would like to see an increased opportunity to harvest these fish. Currently, the bag limit for King Salmon over 20" is 1 King Salmon per day, either wild or hatchery. For at least 9 years prior to 2014, the bag limit for King Salmon over 20" was 2 King Salmon per day, but where just 1 fish could be a wild King Salmon.

PROPOSED BY: Gary Sinnhuber	(EF-F16-141)
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(Proposal 10 was submitted by two proposers. The proposal and justification for each proposer is listed below.)

<u>PROPOSAL 10</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. Require mandatory retention of king salmon caught with bait on Anchor River, Deep Creek, and the Ninilchik River, as follows:

The solution to this problem would be to eliminate the option of catch and release with bait. If you want to fish with bait because of its effectiveness and your goal is to catch fish for the freezer, thats ok. However, once you land a fish, that fish must be retained. The option to catch and release with bait killing as many as 6 out of 10 as fish are "sorted through" no longer exists.

New regulation would read to the effect of <u>During the dates of (normally stated King Salmon fishing dates)</u> fishermen choosing to use bait who land a King Salmon over the length of 20 inches must retain that fish and immediately record their catch. The practice of catch and release of King Salmon using bait is prohibited.

New regulation would apply to the open waters of Anchor River, Ninilchik River, and Deep Creek during the King Salmon season.

What is the issue you would like the board to address and why? The use of bait allowing for "increased harvest opportunity" within the waters of Anchor River, Ninilchik River, and Deep Creek has had the unintended consequence of drastically increasing "cryptic mortality". The practice of fisherman choosing to use bait and then "sort" through their fish until landing one they deem worth retention has resulted in a large amount of fish surccoming to the increased mortality rates of bait fishing. The latest study of fish mortality of catch and release with artificial means vs. bait by Idaho Fish and Game showed 4-6% with artificial lures/ flies and ~25% with bait. In the 1996 report "Survey of Recreational Fishing in Canada" by Schiller and Bergersen it was determined to be approximately 10% vs. 32-64% respectively for artificial lures/ flies vs. bait. While the idea of increased harvest opportunity with the use of bait in a fishery that clearly is going to be within the escapement goal is a reasonable idea, the idea of killing multiple fish to get the one and angler likes is unacceptable.

If nothing is changed there will continue to be unnecessary mortality to King Salmon runs that have struggled to meet the minimum escapement goals for the last several years

Other options would be to eliminate bate entirely, however, that would impact harvest opportunity.

PROPOSED BY: Zach Stubbs (EF-F16-153)

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What is the issue you would like the board to address and why? The use of Bait in Anchor, Deep Creek, and Ninilchick rivers during king season. practicing catch and release using bait has a direct affect on mortality of king salmon entering the river to spawn. The more people use bait to catch kings and practice catch and release for sport or selection of a desired king decreases the number of kings reaching spawning grounds. We have to reduce the mortality rate of kings to increase future escapement goals

<u>PROPOSAL 11</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. Create a youth-only fishery on Anchor, Deep Creek, and Ninilchik rivers, as follows:

New regulation would read to the effect of King Salmon Fishing on the Fridays evenings before the day of opening on Anchor, Deep Creek, and Ninilchick rivers between 6 and 9pm will be available for 16 and under fisherman only. A mother or Father can accompany the fisherman and help with fishing but may not fish.

What is the issue you would like the board to address and why? There are insufficient opportunities for youth only fisheries. In order to promote youth fishing there should be time and dates specifically for youth fishing only.

PROPOSED BY: Mike Priebe (EF-F16-156)

<u>PROPOSAL 12</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. Create a youth-only fishery on Anchor, Deep Creek, and Ninilchik rivers, as follows:

The solution: Create a youth sports fishery on the Anchor River, Ninilchik River, and Deep Creek. Fishery would be held within the normally open geographic boundaries between the hours for 6-9pm on the Fridays preceding the open weekends on the prospective streams. The fishery would be available to those Alaskans between the ages of 6 and 15. This age does not require a fishing license or king salmon stamp, but would require a youth fishery form to record their catch. The annual limit would be 1 per year total between the streams within the special fishery (A successful catch in the youth fishery would not stop them from fishing in normal fisheries). This fishery could be managed very similarly to the extremely successful Big Game Youth Hunts found within the State already.

This proposal would also meet 1 of the 3 stated core values in the 2015-2020 Fish and Game Strategic Plan - Excellence in Fisheries management and research for the benefit of sport anglers, the State's economy, and **future generations of Alaskans.**

What is the issue you would like the board to address and why? The King Salmon fishery of the lower Cook Inlet steams Anchor River, Ninilchik River, and Deep Creek have seen a large increase in pressure over the years. This increased pressure and the way in which the fishing periods are managed (opening at 12:00am) have impacted the fishing quality for our future Alaskans. When the fishery opens the amount of light is very low. Hooks fly around and most adults' attention falls upon catching their own fish. When day breaks the majority of the aggressive more easily caught fish have been taken and the opportunity for our youth to catch a Wild Alaskan King Salmon is extremely low.

If nothing is changed the amount of young alaskans entering and showing interest in sports fishing will continue to decline.

PROPOSED BY: Zach Stubbs (EF-F16-162)

<u>PROPOSAL 13</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. Create a disabled angler-only fishing area on the Anchor River, as follows:

The Department of Fish and Game shall dedicate a Handicap only (and Disabled Veteran) fishing area from the Anchor Rive bridge downstream 200'. This area will be for the exclusive use of those

who qualify using the same standards as the already established and successful Russian River site. The Handicap only area would only be "live" during the King Salmon season. The required improvements to access the area would be provided for at no cost to the State of Alaska.

What is the issue you would like the board to address and why? In South-central Alaska there are no areas dedicated to exclusive use King Salmon fishing for handicap persons and disabled veterans. While there has been much success with the handicap access/ fishery for Sockeye Salmon on the Russian River, there has yet to be a dedicated area for King Salmon. Access to one of Alaska's most valuable resources is extremely difficult for or physically challenged citizens.

If nothing changes our handicap Alaskans and disabled veterans will continue to only have a dedicated area for Sockeye Salmon and lacking for King Salmon.

(Proposal 14 will be heard and public testimony will be taken at both the LCI and UCI meetings and deliberated at the UCI meeting).

<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, as follows:

Allow sockeye salmon not hooked in the mouth to be retained in Fresh water Lakes in the Cook Inlet Drainage.

What is the issue you would like the board to address and why? It is almost impossible to catch sockeye salmon in the mouth unless there is some current, Sockeye salmon do not bite unless in late spawning stage,

<u>PROPOSAL 15</u> – 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet—Resurrection Bay Saltwater Area.; and 5 AAC 58.060. Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Modify the king salmon bag and possession limit north of the latitude of Bluff Point, the Cook Inlet harvest record requirement, and the *Winter King Salmon Management Plan* to include all Cook Inlet salt waters from September 1 through March 31, and review the guideline harvest level, as follows:

- 5 AAC 58.022(b)(1) is amended to read:
 - (b).....
 - (1) in waters of Cook Inlet north of the latitude of Bluff Point (59° 40.00' N. lat.): (A) king salmon:

(i) may be taken from January 1 – December 31; bag and possession limit of one fish; no size limit; an annual harvest limit of five king salmon 20 inches or greater in length, except as provided in (iv) and in (c) of this section;.....

. .

(iv) from September 1 – March 31, king salmon are not required to be entered on a harvest record and do not count against the annual limit set out in (a)(1) of this section;

- (2) in the waters of Cook Inlet south of the latitude of **Bluff Point (59° 40.00' N. lat.)** [THE ANCHOR POINT LIGHT AT 59° 46.14' N. LAT.], including all of Kachemak Bay, to the latitude of Cape Douglas at 58° 51.10' N. lat., and east to the longitude of Gore Point at 150° 57.85' W. long.:
 - (A) king salmon: from <u>September 1 March 31</u> [OCTOBER 1 MARCH 31], king salmon do not need to be entered on a harvest record and do not count against the annual limit set out in (a)(1) of this section;

. . .

5 AAC 58.060 is amended to read:

- **5 AAC 58.060. [LOWER] Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan.** (a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon in the salt waters of [LOWER] Cook Inlet during the winter, which occurs from **September 1** [OCTOBER 1] through March 31.
 - (b) In the winter salt water king salmon sport fishery in [LOWER] Cook Inlet
 - (1) the guideline harvest levels is **x,xxx** [3,000] king salmon;

. .

(c) For the purpose of this section, [LOWER] Cook Inlet consists of the salt waters west of the longitude of Gore Point at 150° 57.85' W. long. and north of the latitude of Cape Douglas at 58° 51.10' N. lat., including all of Kachemak Bay. [SOUTH OF THE LATITUDE OF THE ANCHOR POINT LIGHT AT 59° 46.14' N. LAT., INCLUDING ALL OF KACHEMAK BAY, TO THE LATITUDE OF CAPE DOUGLAS AT 58° 51.10' N. LAT., AND EAST TO THE LONGITUDE OF GORE POINT AT 150° 57.85' W. LONG.]

What is the issue you would like the board to address and why? In response to public concerns regarding regulations adopted by the Alaska Board of Fisheries (board) at the 2001 Lower Cook Inlet meeting, the board formed a Local Area Management Plan (LAMP) Committee charged with exploring options to slow the growth of the Cook Inlet winter king salmon fishery. The Alaska Department of Fish and Game (department) provided Statewide Harvest Survey (SWHS) and coded wire tag data on king salmon catch from the area that indicated sport effort and harvest were increasing, but the department was not able to provide specific information regarding stock of origin of that harvest by area or time of year. The department supported Proposal 437 submitted for the October 2002 board meeting stating the "Lack of winter fishery statistics precludes the development of definitive management objectives...the winter fishery plan is a broad approach that will stabilize the winter king salmon sport fishing opportunity and harvest..." Proposal 437 went on to become 5 AAC 58.060. Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Since the creation of the plan in 2002, the department has collected SWHS data reported by season

and genetics data to contribute to the discussion and understanding of potential impacts of the winter king salmon fishery on local Cook Inlet stocks.

The boundary defined in the *Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan* creates an unnecessary disparity between king salmon bag, possession and annual limits within Cook Inlet. The timing of the spawning migration of Cook Inlet king salmon stocks occurs from April through August. By including September in the winter fishery plan, anglers will no longer be required to record the king salmon harvest in the month of September as a part of the their annual limit. In addition, the new regulation would align the king salmon annual limit during the period of time when spawning Cook Inlet stocks are present in Cook Inlet. This proposal would modify the timeframe of the winter king fishery by including September, and expand area to include all of Cook Inlet. This change would simplify the sport fishing regulations in the winter fishery.

The guideline harvest level (GHL) of 3,000 king salmon was established to slow the growth of the sport harvest of king salmon in the marine waters of Lower Cook Inlet. If the board's intent was to limit the harvest of Cook Inlet stocks, then the board may want to consider if an increase should be considered to account for the contribution of nonlocal feeder king salmon harvest in Cook Inlet from September through March.

PROPOSED BY: Alaska Department of Fish and Game	(HQ-F16-118)
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<u>PROPOSAL 16</u> – 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet–Resurrection Bay Saltwater Area.; and 5 AAC 58.055. Upper Cook Inlet Salt Water Early-run King Salmon Management Plan. Redefine fishing area, species that may be retained, the goal of the *Upper Cook Inlet Saltwater Early-run King Salmon Management Plan*, and eliminate special harvest areas, and clarify that guides and their crew may not fish for king salmon while guiding, as follows:

- 5 AAC 58.022(b)(1)(A)(iii) is amended to read:
 - (b)...(1) in waters of Cook Inlet north of the latitude of Bluff Point (59° 40.00' N. lat.)(A) king salmon:
 - (iii) in the salt waters of the latitude of the mouth of the Ninilchik River (60° 03.99' N. lat.) to the latitude of Bluff Point (59° 40.00' N. lat.), [AND WITHIN ONE MILE OF SHORE,] a person may not, after taking a king salmon 20 inches or greater in length, fish for **king salmon** [ANY SPECIES OF FISH] on that same day as specified in 5 AAC 58.055(e);
- 5 AAC 58.055 is amended to read:
- **5 AAC 58.055. Upper Cook Inlet Salt Water [EARLY-RUN] King Salmon Management Plan.** (a) The goal of this management plan is to stabilize the sport harvest of [EARLY-RUN] king salmon in the mixed stock salt water sport fishery in **Upper** [UPPER] Cook Inlet.

- (b) <u>Upper Cook Inlet</u> [THE EARLY-RUN KING SALMON SPECIAL HARVEST AREA] consists of all salt water south of the latitude of the mouth of the Ninilchik River (60° 03.99' N. lat.) to the latitude of Bluff Point (59° 40.00' N. lat.) [AND WITHIN ONE MILE OF SHORE].
- (c) From April 1 through <u>August 31</u> [JUNE 30], within the waters described in (b) of this section, a person who is a sport fishing <u>guide or sport fishing guide crewmember</u> [GUIDING] may not sport fish <u>for king salmon</u> while a client is present or is within the guide's control or responsibility.

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(e) Within the waters described in (b) of this section, from April 1 through <u>August 31</u> [JUNE 30], a person may not, after taking a king salmon 20 inches or greater in length, fish for <u>king salmon</u> [ANY SPECIES OF FISH] on that same day.

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What is the issue you would like the board to address and why? This proposal seeks to simplify regulations associated with the early-run king salmon fishery. Special Harvest Areas (SHA) and associated regulations were created to reduce harvest of early-run king salmon returning to the Anchor River, Stariski Creek, Deep Creek, and Ninilchik River. Regulations associated with SHAs are difficult to follow and enforce because the 1 mile distance from shore fluctuates with the changing tide cycle. Furthermore, king salmon returning to Cook Inlet streams to spawn also move in and out of the 1-mile corridor with the changing tide.

This plan will simplify the regulations by removing the SHAs while maintaining effective regulations defining the closed areas surrounding the river mouths of the Anchor River, Stariski Creek, Deep Creek, and Ninilchik River. The proposal will also prohibit guides and crew from sport fishing for king salmon while guiding, and prohibit anglers from fishing for king salmon after harvesting a king salmon 20 inches or greater in length. In addition, by extending this plan through August 31 all returning Cook Inlet king salmon stocks migrating through the saltwater area in July and August will be offered some additional protection.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F16-119)

<u>PROPOSAL 17</u> – 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet–Resurrection Bay Saltwater Area. Remove the special harvest areas and extend the distance from shore an angler can fish for king salmon after harvesting a king salmon 20 inches or greater in length, as follows:

- 5 AAC 58.022(b)(1)(A) is amended to read:
 - (b)...

(1) in waters of Cook Inlet north of the latitude of Bluff Point (59° 40.00' N. lat.): (A) king salmon:

• • •

(ii) <u>repealed</u> / /2017 [THE SALT WATERS WITHIN A ONE MILE RADIUS OF THE TERMINUS OF THE NINILCHIK RIVER ARE CLOSED TO SPORT FISHING FOR KING SALMON FROM JANUARY 1 – JUNE 30, EXCEPT

THAT SPORT FISHING FROM SHORE IS ALLOWED ON MEMORIAL DAY WEEKEND AND THE FOLLOWING TWO WEEKENDS AND THE MONDAY FOLLOWING EACH OF THOSE WEEKENDS];

(iii) in the salt waters south of the latitude <u>approximately one mile north</u> [OF THE MOUTH] of the Ninilchik River (60° 03.99' N. LAT.) to the latitude of Bluff Point (59° 40.00' N. lat.), and within one mile of shore, a person may not, after taking a king salmon 20 inches or greater in length, fish for any species of fish on that same day as specified in 5 AAC 58.055(e);

5 AAC 58.055(d)(1) is amended to read:

- (d) The following waters, within one mile of shore, are closed to all sport fishing from April 1 through June 30:
 - (1) <u>from an ADF&G regulatory marker located approximately one mile north</u> [SOUTH OF THE LATITUDE] of the Ninilchik River <u>at 60° 03.99' N. lat.</u> to [THE LATITUDE OF] an ADF&G regulatory marker located two mile south of Deep Creek at 60° 00.68' N. lat., except that sport fishing from shore is allowed on Memorial Day weekend and the following two weekends and the Monday following each of those weekends;

What is the issue you would like the board to address and why? Eliminating the closed area north of the Ninilchik River and extending the conservation zone south of the Ninilchik River to include the area one mile north of the Ninilchik River would simplify regulations in the closed areas surrounding the Ninilchik River from April 1 through June 30. The area one mile north of the Ninilchik River would be included into the *Upper Cook Inlet Salt Water Early-run King Salmon Management Plan*.

PROPOSED BY: Alaska Department of Fish and Game (HQ-F16-120)

<u>PROPOSAL 18</u> – 5 AAC 58.055. Upper Cook Inlet Salt Water Early-run King Salmon Management Plan. Align the saltwater closed area season with inriver run timing and freshwater regulations, as follows:

The introductory language of 5 AAC 58.055(d) is amended to read:

(d) The following waters, within one mile of shore, are closed to all sport fishing from April 1 through **July 15** [JUNE 30]:

. . .

What is the issue you would like the board to address and why? On July 1, the saltwater closed areas surrounding the Anchor River, Stariski Creek, Deep Creek, and Ninilchik River open to sport fishing (including king salmon). Bait and multiple hooks are allowed in this fishery. Based on run timing data, a significant number of king salmon enter the adjacent streams during the first two weeks

of July 1, the Anchor River, Stariski Creek, Deep Creek also open to sport fisheries (except for king salmon). In 2010, the Alaska Board of Fisheries limited gear to one unbaited, single-hook artificial lure from July 1-15 to reduce hooking mortality of maturing king salmon in these streams.

PROPOSED BY: Alaska Department of Fish and Game	(HQ-F16-121)
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<u>PROPOSAL 19</u> - 5 AAC 58.060. Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan by starting the season August 10, as follows:

(a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon in the salt waters of Lower Cook Inlet during the winter, which occurs from <u>August 10</u> [OCTOBER 1] through March 31

What is the issue you would like the board to address and why? This proposal would amend the plan's designation of "winter" occurring, from the current stated date of October 1, to the proposed date of August 10, in efforts to increase recreational angler safety while maintaining the effectiveness of management actions.

According to ADF&G records for each of the past several years, the Anchor River weir was removed on August 3rd because most of the returning king salmon were already in the river.

In each of the past 5 years the Kenai River sonar (located over 8 miles up-river) was removed between Aug 10-15th because most of the returning king salmon were already in the river.

Despite the fact that the salmon returning to these Cook Inlet spawning aggregations were in-river and unavailable to recreational salt water anglers, the Lower Cook Inlet recreational troll fishery 5 king salmon limit remains in place until September 30th.

The October 1 date set forth in the management plan arbitrarily and unnecessarily restricts sport fishing opportunities for the Lower Cook Inlet recreational troll fishery. Further, if there are some stragglers, they benefit from the existing "Special Harvest Zones" and "Conservation Zones" established to protect returning spawning stocks.

Marine weather conditions in Lower Cook Inlet are a significant factor for these recreational anglers; many of whom fish from small vessels and a good number will fish alone on occasion. The marine weather after October 1 is significantly more variable and dangerous than the months of August and September.

Changing the plan's designated start of "winter" from October 1 to August 10 is unlikely to have any effect on management concerns, but could significantly improve angler safety in the fishery.

In the event that, in a future year, weir logs or river sonar logs indicate a significant shift in latearriving king salmon, there would be sufficient time for responsive management measures to be undertaken

PROPOSED BY:	Pete Zimmerman, spokesma	in for Cook Inlet Recreational	Fishermen
			(HQ-F16-054)
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<u>PROPOSAL 20</u> - 5 AAC 58.060(a). Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan by extending season to April 30, as follows:

(a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon in the salt waters of Lower Cook Inlet during the winter, which occurs from October 1 through **April 30** [MARCH 31].

What is the issue you would like the board to address and why? This proposal would amend the plan's designation for the end date of "winter" fishery, from the presently stated March 31, to the proposed end date of April 30.

According to ADF&G records for the 8 year period of 2007-2014, a total of 38,248 king salmon entered the Anchor River. Yet, for the same 8-year period, a total of only 32 king salmon entered the Anchor River prior to May 13.

Years of data confirm that the numbers of king salmon passing the Anchor River weir prior to May 13 is very low and virtually insignificant. Yet despite these facts, this management plan imposes the 5 king salmon limit after March 31 on a salt water troll sport fishery that catches primarily non-local "feeder" king salmon and not king salmon returning to Cook Inlet spawning aggregations.

This management plan's March 31 date is not reflective of actual migration data for king salmon returning to Cook Inlet spawning aggregations.

The March 31 date set forth in the management plan arbitrarily and unnecessarily restricts sport fishing opportunities for the Lower Cook Inlet recreational troll fishery. Particularly in light of the fact that the fishery catches primarily non-Cook Inlet "feeder" king salmon. In addition, king salmon returning to Cook Inlet spawning aggregations benefit from designated "Special Harvest Zones" and "Conservation Zones" established to protect stocks of concern.

The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

The management plan's March 31 date imposes more of the conservation burden on the Lower Cook Inlet recreational king salmon troll fishery than is warranted in light of its very low impact on Cook Inlet king salmon stocks of concern. The best available information shows that the proposed April 30 amendment to the management plan will not generate any sustained yield concerns on Cook Inlet Chinook salmon spawning aggregations.

The Lower Cook Inlet recreational salt water troll fishery does not pose a threat to conservation of either Cook Inlet king salmon stocks or visiting non-local feeder king salmon.

However, it is an extremely important fishery for both the local economy and for personal and family consumption. King salmon fishing in what is typically viewed as the "off" season is very important for providing residents with the opportunity to obtain fish for personal or family consumption. Particularly in light of strict harvest restrictions on many traditional fishing locations, the chance to harvest abundant non-local feeder king salmon for personal consumption is a very important recreational fishing opportunity. One that should not be restricted any more than absolutely necessary.

For many recreational anglers, the current March 31 imposition of the 5 king salmon limit is viewed as an unnecessary restriction, one that is not rationally related to conservations, and a limit on their ability to catch fish for consumption purposes. As a result, their number of fishing trips would be reduced, along with the associated economic inputs, while their resentment may increase. Beside the economic impacts from the accumulation of lost recreational fishing opportunities, anglers may find themselves purchasing imported farmed salmon as an inadequate substitute.

Changing the plan's designated end of "winter" from the currently designated March 31 date, to the proposed date of April 30, is highly unlikely to have any effect on management concerns, but would have considerable benefit to the Lower Cook Inlet recreational feeder king troll fishery participants, their families, and the local and regional economy.

PROPOSED BY:	Cook Inlet Recreatio	nal Fishermen (CIRF) Pete Zir	nmerman, sp	okesman
				(1	HQ-F16-051)
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<u>PROPOSAL 21</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet - Resurrection Bay Saltwater Area. Eliminate king salmon annual limit for Lower Cook Inlet marine fishery south of Anchor Point Light, as follows:

5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet - Resurrection Bay Saltwater Area (a) Except as provided in (b) and (c) of this section, the following are the seasons, bag, possession, annual, and size limits, and special provisions for finfish and shellfish in the Cook Inlet - Resurrection Bay Saltwater Area: (1) king salmon: may be taken from January 1 - December 31; bag and possession limit of two fish; no size limit; an annual harvest limit of five king salmon 20 inches or greater in length, except the "annual harvest limit of five king salmon 20 inches or greater in length" requirement shall not apply to the Lower Cook Inlet recreational troll king salmon fishery south of Anchor Point Light (59°46.14' N. lat.),

What is the issue you would like the board to address and why? Eliminate the current regulations' harvest limit of five king salmon, 20 inches or greater in length, for the Lower Cook Inlet recreational salt water troll fishery south of Anchor Point Light.

The Lower Cook Inlet recreational salt water troll fishery harvests primarily "feeder" king salmon which do not originate from Cook Inlet spawning aggregations.

As mounting scientific data confirms, the Lower Cook Inlet recreational salt water troll fishery does not pose a threat to conservation of returning Cook Inlet stocks-of-concern. Application of the 5 king salmon seasonal harvest limit to this recreational salt water troll fishery is neither a very effective nor reliable means for advancing sustainable management of Cook Inlet king salmon stocks of concern.

In addition to not providing any measurable benefit, the 5 king salmon seasonal harvest limit is unduly restrictive and disproportionally burdensome on the Lower Cook Inlet salt water king salmon sport fishery and its participants' opportunity to catch non-local "feeder" king salmon for consumption.

The 5 king salmon harvest limit deprives the public of sport fishing opportunities during months when non-Cook Inlet "feeder" king salmon are abundant and weather patterns are most favorable and less hazardous.

PROPOSED BY: Pete	e Zimmerman, spokesman for Cook Inlet Recreational	Fishermen
		(HQ-F16-045)
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<u>PROPOSAL 22</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet – Resurrection Bay Saltwater Area. Eliminate harvest record requirement for Alaska residents for king salmon in Lower Cook Inlet marine fishery south of Anchor Point Light, as follows:

5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet - Resurrection Bay Saltwater Area (a) Except as provided in (b) and (c) of this section, the following are the seasons, bag, possession, annual, and size limits, and special provisions for finfish and shellfish in the Cook Inlet - Resurrection Bay Saltwater Area: (1) king salmon: may be taken from January 1 - December 31; bag and possession limit of two fish; no size limit; an annual harvest limit of five king salmon 20 inches or greater in length, except as provided in (c) of this section; a harvest record is required as specified in 5 AAC 75.006, except a harvest record shall not be required of Alaska residents for king salmon harvested in the Lower Cook Inlet recreational troll king salmon fishery south of Anchor Point Light (59°46.14' N. lat.),

What is the issue you would like the board to address and why? Eliminate the harvest record requirement for king salmon harvested from marine waters south of Anchor Point Light in the Lower Cook Inlet recreational salt water troll fishery.

The Lower Cook Inlet recreational salt water troll fishery harvests primarily "feeder" king salmon which do not originate from Cook Inlet spawning aggregations.

As mounting scientific data confirms, the Lower Cook Inlet recreational salt water troll fishery does not pose a threat to conservation of returning Cook Inlet stocks-of-concern. The harvest record requirement is neither a very effective nor reliable means for advancing sustainable management of Cook Inlet king salmon stocks of concern.

In addition to not providing any measurable benefit, the harvest record requirement is unnecessarily burdensome on the Lower Cook Inlet salt water king salmon sport fishery.

In light of the above, the harvest record requirement for king salmon harvested from marine waters south of Anchor Point Light in the Lower Cook Inlet recreational salt water troll fishery is viewed as unnecessary paperwork and should be eliminated.

PROPOSED BY: Pete Zimmerman, spokesman for Cook Inlet Recreational Fishermen
(HQ-F16-046)

<u>PROPOSAL 23</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet – Resurrection Bay Saltwater Area. Eliminate harvest record requirement for king salmon in Lower Cook Inlet marine fishery south of Anchor Point Light, as follows:

(a) Except as provided in (b) and (c) of this section, the following are the seasons, bag, possession, annual, and size limits, and special provisions for finfish and shellfish in the Cook Inlet - Resurrection Bay Saltwater Area: (1) king salmon: may be taken from January 1 - December 31; bag and possession limit of two fish; no size limit; an annual harvest limit of five king salmon 20 inches or greater in length, except as provided in (c) of this section; a harvest record is required as specified in 5 AAC 75.006, except a harvest record shall not be required for king salmon harvested in the Lower Cook Inlet recreational troll king salmon fishery south of Anchor Point Light (59°46.14' N. lat.),

What is the issue you would like the board to address and why? Eliminate the harvest record requirement for Alaska residents for king salmon harvested from marine waters south of Anchor Point Light in the Lower Cook Inlet recreational salt water troll fishery.

The Lower Cook Inlet recreational salt water troll fishery harvests primarily "feeder" king salmon which do not originate from Cook Inlet spawning aggregations.

As mounting scientific data confirms, the Lower Cook Inlet recreational salt water troll fishery does not pose a threat to conservation of returning Cook Inlet stocks-of-concern. The harvest record requirement is neither a very effective nor reliable means for advancing sustainable management of Cook Inlet king salmon stocks of concern.

In addition to not providing any measurable benefit, the harvest record requirement is unnecessarily burdensome for Alaska residents participating in the Lower Cook Inlet salt water king salmon sport fishery.

In light of the above, the harvest record requirement for king salmon harvested by Alaska residents from marine waters south of Anchor Point Light in the Lower Cook Inlet recreational salt water troll fishery is viewed as unnecessary paperwork and should be eliminated.

PROPOSED BY:	Pete Zimmerman,	spokesman	for Cook	Inlet Rec	reational Fig	shermen (CIRF)
						(HQ-F1	6-047)
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<u>PROPOSAL 24</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet - Resurrection Bay Saltwater Area. Eliminate harvest limit for king salmon harvested in Lower Cook Inlet marine fishery south of Anchor Point Light, as follows:

5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for Cook Inlet - Resurrection Bay Saltwater Area (a) Except as provided in (b) and (c) of this section, the following are the seasons, bag, possession, annual, and size limits, and special provisions for finfish and shellfish in the Cook Inlet - Resurrection Bay Saltwater Area: (1) king salmon: may be taken from January 1 - December 31; bag and possession limit of two fish; no size limit; an annual harvest limit of five king salmon 20 inches or greater in length, except the "annual harvest limit of five king salmon 20 inches or greater in length" requirement shall not apply to Alaska residents for king salmon harvested in the Lower Cook Inlet recreational troll king salmon fishery south of Anchor Point Light (59°46.14' N. lat.),

What is the issue you would like the board to address and why? Eliminate the current regulations' harvest limit of five king salmon, 20 inches or greater in length, for Alaska residents in the Lower Cook Inlet recreational salt water troll fishery south of Anchor Point Light.

The Lower Cook Inlet recreational salt water troll fishery harvests primarily "feeder" king salmon which do not originate from Cook Inlet spawning aggregations.

As mounting scientific data confirms, the Lower Cook Inlet recreational salt water troll fishery does not pose a threat to conservation of returning Cook Inlet stocks-of-concern. Application of the 5 king salmon seasonal harvest limit to Alaska residents in this recreational salt water troll fishery is neither a very effective nor reliable means for advancing sustainable management of Cook Inlet king salmon stocks of concern.

In addition to not providing any measurable benefit, the 5 king salmon seasonal harvest limit is unduly restrictive and disproportionally burdensome on Alaska residents' opportunity to catch non-local "feeder" king salmon for consumption.

The 5 king salmon harvest limit deprives Alaska residents of sport fishing opportunities during months when non-Cook Inlet "feeder" king salmon are abundant and weather patterns are most favorable and less hazardous

PROPOSED BY:	Pete Zimmerman, spok	esman for Cook Inle	t Recreational Fish	ermen
				(HQ-F16-048)
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<u>PROPOSAL 25</u> - 5 5 AAC 58.060(a). Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan to specify that the plan applies to king salmon of Cook Inlet spawning origin, as follows:

(a) The purpose of the management plan under this section is to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon <u>originating from Cook</u> <u>Inlet spawning aggregations</u>, in the salt waters of Lower Cook Inlet during the winter, which occurs from October 1 through March 31.

What is the issue you would like the board to address and why? This proposal would amend the identified management plan's guiding principles by clarifying that the plan's goal addresses king salmon "originating from Cook Inlet spawning aggregations" and does not seek to manage non-local and non-Alaska king salmon stocks via the plan's restrictions on the Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery.

The purpose and stated goal of the identified management plan are vague and indefinite. This proposal seeks to amend the plan's goal to clarify the management plan's guiding principles.

The stated purpose of the management plan under 5 AAC 58.060 is "to meet the Board of Fisheries' goal of slowing the growth in the sport harvest of king salmon in the salt waters of Lower Cook Inlet during the winter..."

Without the proposed change, the management plan unnecessarily regulates a sport fishery whose harvest consists primarily of non-spawning "feeder" kings that do not originate from Cook Inlet spawning aggregations. In fact, the fishery's primary catch comprises visiting non-local, non-spawning, and non-Alaska salmon.

The present proposal is respectfully submitted in an effort to clarify the purpose and goal of the management plan in light of the best available scientific information. When the management plan was first implemented, the Board understandably adopted a precautionary approach, taking into account the then-existing uncertainties. In the ensuing years, those uncertainties have been greatly reduced through considerable scientific study and the contributions of the local and traditional knowledge (LTK) of this fishery's participants.

The sum total of this body of evidence confirms what Lower Cook Inlet recreational salmon troll anglers have been stating all along, and fishery science had long suggested – that the sport harvest

of king salmon in the salt water of Lower Cook Inlet harvests primarily non-Cook Inlet "feeder" kings.

Alaska's policy for regulation and management of sustainable salmon fisheries is recognized and appreciated, as is the need for specific guiding principles and criteria. (5 AAC 39.222)

The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

Without the proposed amendment, the management plan will continue to state a purpose and goal that unnecessarily and improperly impose a punitive restriction on the recreational anglers seeking to fish for these feeder king salmon.

PROPOSED BY:	Pete Zimmerman, spokesman f	for Cook Inlet Recreational Fishermen	
		(HQ-F16-05)	0)
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PROPOSAL 26 - 5 AAC 58.060(a). Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan to specify that the plan applies to king salmon of Cook Inlet spawning origin, as follows:

(1) the guideline harvest level is 3,000 king salmon <u>originating from Cook Inlet</u> spawning aggregations;

What is the issue you would like the board to address and why? This proposal would amend the guideline harvest level (GHL) in effort to clarify the plan guiding principle to manage wild king salmon "originating from Cook Inlet spawning aggregations" rather than non-Cook Inlet "feeder" king salmon comprising the bulk of the recreational catch in the Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery.

Alaska's policy for regulation and management of sustainable salmon fisheries is recognized and appreciated, as is the need for specific guiding principles and criteria. (5 AAC 39.222) In light of this policy, the GHL is viewed as inconsistent and not proportionally related to advancement of the conservation standards contained in the sustainable salmon and mixed stock salmon policies. The present proposal is respectfully submitted in an effort to clarify the purpose and goal of the management plan in light of these policies. When the management plan was first implemented, the Board understandably adopted a precautionary approach, taking into account the then-existing uncertainties. In the ensuing years, those uncertainties have been greatly reduced and the allencompassing scope of a blanket GHL is no longer justified.

The GHL set forth in the current management plan is not very effective for conserving Cook Inlet wild king salmon stocks of concern. The Lower Cook Inlet recreational troll king salmon fishery harvests primarily "feeder" king salmon that do not originate from Cook Inlet spawning aggregations. Rather, as fishermen have long known and science has recognized, these "feeder" king salmon originate from hatcheries in Southeast Alaska, British Columbia, Washington, Oregon and elsewhere. Great numbers of these "feeder" king salmon come to Lower Cook Inlet waters to feed on abundant bait resources in the area.

In addition to not providing any measurable benefit, the plan's GHL is unduly restrictive and disproportionally burdensome on the Lower Cook Inlet salt water king salmon sport fishery and its participants' opportunity to catch non-local "feeder" king salmon for consumption.

The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

The management plan's GHL is unwarranted and inappropriate, particularly in light of the major proportion of this sport fishery's harvest of king salmon that do not originate from Cook Inlet spawning aggregations. Comparisons of Cook Inlet wild king salmon interceptions from various sources demonstrate the insignificant effect of this sport fishery on wild king salmon originating from Cook Inlet spawning aggregations.

The State of Alaska manages salmon populations to meet spawning (escapement) requirements first, allowing salmon that are surplus to escapement to be harvested in the commercial, sport, subsistence, and personal use fisheries. The Lower Cook Inlet recreational troll king salmon fishery has low to very low impact on wild king salmon originating from Cook Inlet spawning aggregations, especially during the management plan's "winter" period.

Accordingly, it is inappropriate and unnecessarily punitive to maintain this overly broad GHL to slow the growth in the sport harvest of king salmon in an effort to conserve specific Cook Inlet king salmon stocks of concern. This GHL imposes more conservation burden on the Lower Cook Inlet recreational troll king salmon fishery than is appropriate in full consideration of the fishery's very low impact on Cook Inlet king salmon stocks of concern.

Without the proposed change, the management plan will continue to unnecessarily and unfairly limit a sport fishery for catching primarily "feeder" king salmon originating from outside Cook Inlet and outside Alaska. This proposal seeks to help address the growing perception that this management plan punishes Alaska fishermen for catching non-Alaska fish.

PROPOSED BY:	Pete Zimmerman, sp	ookesman for	Cook Inlet R	ecreational Fisl	nermen
					(HQ-F16-052)
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PROPOSAL 27 - 5 AAC 58.060. Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan. Amend Lower Cook Inlet Winter Salt Water King Salmon Sport Fishery Management Plan by removing the guideline harvest level, as follows:

[(1) THE GUIDELINE HARVEST LEVEL IS 3,000 KING SALMON;]

What is the issue you would like the board to address and why? This proposal would remove the guideline harvest level (GHL) of 3,000 king salmon from the management plan. The GHL is viewed as unnecessary, overly broad, and not proportionally related to advancement of the conservation standards contained in the sustainable salmon and mixed stock salmon policies.

The present proposal is respectfully submitted in an effort to clarify the purpose and goal of the management plan in light of the best available scientific information. When the management plan was first implemented, the Board understandably adopted a precautionary approach, taking into account the then-existing uncertainties. In the ensuing years, those uncertainties have been greatly reduced and the GHL is no longer warranted.

Alaska's policy for regulation and management of sustainable salmon fisheries is recognized and appreciated, as is the need for specific guiding principles and criteria. (5 AAC 39.222)

The GHL set forth in the current management plan is not very effective for conserving Cook Inlet king salmon stocks of concern. The Lower Cook Inlet recreational troll king salmon fishery harvests primarily "feeder" king salmon that do not originate from Cook Inlet spawning aggregations. Great numbers of these "feeder" king salmon come to Lower Cook Inlet waters to feed on abundant bait resources in the area.

In addition to not providing any measurable benefit, the plan's GHL is unduly restrictive and disproportionally burdensome on the Lower Cook Inlet salt water king salmon sport fishery and its participants' opportunity to catch non-local "feeder" king salmon for consumption.

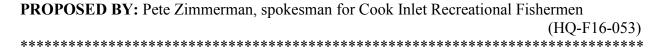
The sustainable salmon fisheries policy states that salmon management objectives should be appropriate to the scale and intensity of uses (5 AAC 39.222(c)(3)(A)). The policy also provides that the burden of conservation should be shared among all fisheries in close proportion to their respective use (5 AAC 39.222(b)(4)(D) and (f)(4)). This idea of proportional burden sharing is also found in the mixed stock policy, which likewise provides that the burden of conservation should be shared among all fisheries in close proportion to their respective harvest on the stock of concern (5 AAC 39.220(b)).

The management plan's GHL is unwarranted and inappropriate, particularly in light of the major proportion of this sport fishery's harvest of king salmon that do not originate from Cook Inlet spawning aggregations. Comparisons of Cook Inlet king salmon interceptions from various sources demonstrate the insignificant effect of this sport fishery on king salmon originating from Cook Inlet spawning aggregations.

The State of Alaska manages salmon populations to meet spawning (escapement) requirements first, allowing salmon that are surplus to escapement to be harvested in the commercial, sport, subsistence, and personal use fisheries. The Lower Cook Inlet recreational troll king salmon fishery has low to very low impact on king salmon originating from Cook Inlet spawning aggregations, especially during the management plan's "winter" period.

Accordingly, it is inappropriate and unnecessarily punitive to impose this GHL to slow the growth in the sport harvest of king salmon in an effort to conserve specific Cook Inlet king salmon stocks of concern. This GHL imposes more conservation burden on the Lower Cook Inlet recreational troll king salmon fishery than is appropriate in full consideration of the fishery's very low impact on Cook Inlet king salmon stocks of concern.

Without the proposed change, the management plan unnecessarily and unfairly limits a sport fishery for catching "feeder" king salmon originating primarily from outside of Cook Inlet and outside of Alaska. This proposal seeks to help address the growing perception that this management plan punishes Alaska fishermen for catching non-Alaska fish.



<u>PROPOSAL 28</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area. Reduce Lower Cook Inlet marine fishery bag limit to one king salmon, as follows:

January 1 - December 31, one king salmon per day, 5 king salmon per year.

What is the issue you would like the board to address and why? While there have been restrictions and closures of Upper Cook Inlet sport, guided sport, personal use, and commercial fisheries over the past 5 years caused by king salmon shortages, in salt water South of the Anchor Point Light from October 1 - March 31 the sport limits are 2 king salmon per day with no annual limit. There are currently 7 king salmon stocks of concern in Northern District drainages with the possibility that more could be added at the 2017 Upper Cook Inlet Board of Fisheries meeting. Kenai River king salmon shortages have created hardships for thousands of users. I do not know how many October - March king salmon caught South of the Anchor Point line are destined to Upper Cook Inlet drainages, however, in light of the hardships to Upper Cook Inlet user groups caused by king salmon shortages I believe it may be time to adjust daily and annual king salmon bag limits South of the Anchor Point line. Such a change should be considered, because of uncertainty, and for precautionary reasons, in light of well-documented Upper Cook Inlet king salmon shortages.

This proposal is also a call to hear and consider the most recent and best available science on the harvest numbers and origin of king salmon stocks caught in this fishery. With public involvement perhaps better solution(s) may be reached. Another solution could be to somehow adjust the October - March bag limit in response to emergency orders issued for stocks North of the Anchor Point Light. If solid and recent science shows hardly any harvest of Upper Cook Inlet king salmon stocks, it could be best to leave this fishery unchanged.

<u>PROPOSAL 29</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area. Allow anglers fishing from non-motorized vessels to keep fishing in the Cook Inlet special harvest areas after harvesting a king salmon, as follows:

(iii) in the salt waters south of the latitude of the mouth of the Ninilchik River (60_03.99' N. lat.) to the latitude of Bluff Point (59_40.00' N. lat.), and within one mile of shore, a person may not, after taking a king salmon 20 inches or greater in length, fish for any species of fish on that same day as specified in (e) **Non-motorized vessels are exempt from this provision.**;

What is the issue you would like the board to address and why? Board of Fish, Please consider an exemption, for non-motorized vessels, from the rule that states: "(iii) in the salt waters south of the latitude of the mouth of the Ninilchik River (60_03.99' N. lat.) to the latitude of Bluff Point (59_40.00' N. lat.), and within one mile of shore, a person may not, after taking a king salmon 20 inches or greater in length, fish for any species of fish on that same day as specified in 5 AAC 58.055(e);"

The reason is safety. There are a small but dedicated group of anglers who choose to fish Cook Inlet from more traditional non motorized methods such as drift boats and kayaks. The days are often limited by weather and the unique fishery off of Lower Cook Inlet where this regulation applies is one area where halibut can be targeted closer to shore. Allowing halibut harvest after a king has been retained allows for maximum opportunities to fish the tides and maximizes safety for those wishing to participate in a more economical and environmentally friendly methods.

The terrain and geography of the area often create calmer waters near shore while areas further offshore have unfishable waters. The fast currents of Cook Inlet on many days restricts the number of hours that are fishable. Both waves and current action are significantly reduced near the shorelines allowing for a safer fishery for non-motorized vessels.

My personal motivation is to expose my 11 year old son further to kayak angling. Having him for only half of the time, my opportunities when combined with weather often limit the opportunity to fish. This requested rule change would allow for greater and safer participation in the world of non-motorized sport angling.

The impact to the resources would be negligible. The limits would remain the same. If a king is caught first, switching over to halibut gear minimizes the likelihood of a king being hooked.

Though effort from non-motorized platforms could increase, by their nature, the catch per unit effort off of non-motorized platforms are likely far below those off of powered vessels.

The current number of non-motorized anglers I would estimate to be less than 30 that currently utilize this area via non-motorized means. Though growing, it will continue to be a very tiny fraction of the total effort in the area for the foreseeable future.

<u>PROPOSAL 30</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area. Increase the king salmon daily bag limit to 10 king salmon under 20" at the Nick Dudiak Fishing Lagoon, as follows:

What is the issue you would like the board to address and why? At the Nick Dudiak Fishing Lagoon, there are large numbers of King Salmon under 20" that never get harvested, because they count towards your daily bag limit of 2 King Salmon. Even though these King Salmon under 20" are in salt water, they are part of the terminal King Salmon fishery at the lagoon, and will not grow any larger, nearing the end of their life cycle. Catching these King Salmon under 20" is especially fun for kids, which is a big reason why the fishing lagoon was created. If nothing in changed, large numbers of King salmon under 20" will continue to go to waste.

On our local rivers, the limit for King Salmon under 20" is 10 per day, and they do not count towards your daily bag limit of King Salmon over 20". Standardizing the daily bag limit for King Salmon under 20" between our local rivers the Nick Dudiak Fishing Lagoon will also eliminate much confusion between fishermen on this issue.

<u>PROPOSAL 31</u> - 5 AAC 58.030. Methods, means, and general provisions – Finfish. Create an archery fishery for salmon in waters of Kachemak Bay open to snagging, as follows:

archery fishing tackle shall be allowed for the taking of salmon where open to snagging by regulation (June 24-Dec 31) in Kachemak bay as follows:

Inside a line extending from the marker defining the northwest boundary of the Nick Dudiak fishing lagoon extending roughly southeast to Peterson point (approx N 59° 35' 51". W 151° 16' 22") including the waters of halibut cove lagoon and the area locally known as "Mud Bay" at the base of the Homer spit.

What is the issue you would like the board to address and why? Lack of opportunity for use of archery fishing tackle where there is no reasonable justification for prohibition.

With the eradication of pike from the kenai peninsula there is no longer anyplace to pursue the sport of bow fishing within reasonable distance of the Homer or Kenai/Soldotna areas.

<u>PROPOSAL 32</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area. Open Lower Cook Inlet ling cod season on June 15 instead of July 1, as follows:

What is the issue you would like the board to address and why? LIng Cod are finished spawning by this time, & additional opportunity should be allowed to harvest ling cod when the weather is good in June, August is very rough in the gulf of alaska and very few days can you get out to fish.

<u>PROPOSAL 33</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area. Establish possession and size limits for small salmon in Resurrection Bay, as follows:

Sockeye, Chum, Pink or Coho less then 16 inches in length and King salmon less then 20 inches in length.

10 per day, 10 in possession in combination.

What is the issue you would like the board to address and why? There is no regulations on small salmon in Resurrection Bay.

Make consistent with the rest or the Kenai Peninsula.

(Proposal 34 will be heard and public testimony will be taken at both the LCI and UCI meetings and deliberated at the UCI meeting).

<u>PROPOSAL 34</u> - 5 AAC 58.022. Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Cook Inlet – Resurrection Bay Saltwater Area; and 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 party fishing in Cook Inlet salt and freshwaters for all species except king salmon, as follows:

What is the issue you would like the board to address and why? 100% of private anglers & 95% of guided anglers party fish for most species, current rules make criminals out of all them,

Tis rule is also non-enforcable for private anglers, & only enforceable on guided anglers if there iran undercover cop nearby or onboard the vessel. When fishing for abundant species with high bag limits such as black rockfish, sockeyes, pinks & others it is almost impossible to keep track of which individual anglers caught what & how many, example is 5 anglers fishing for pinks with limit of 6, it is easy to count to 30, but is very easy to lose track of how many each individual angler has retained.