

October 18, 2017

Testimony to Alaska Board of Fisheries by Matanuska Valley Fish & Game Advisory Committee

Chairman Jensen and Members of the Alaska Board of Fisheries,

my name is Andrew Couch and in this testimony I am representing the Matanuska Valley Fish and Game Advisory Committee. The Committee Consists of 15 members and 2 alternate members. At this time the make up of the Committee consists of mostly sport hunters and sport fishers, although several members at times may also participate in personal use or subsistence fisheries, and some have also participated in subsistence hunting. Currently there are 2 sport fishing guides on the Committee, but no hunting guides, and no commercial fishing permit holders.

The Committee is providing information on 5 subjects that are up for discussion at this meeting:

- A. King Salmon stock status and recent yield levels from struggling Susitna River king salmon populations in Units 2, 3, 5, and 6. We support Yield stock of concern.
- B. The stock status and recent yield levels of Jim Creek coho salmon. We support consideration for Yield stock of concern.
- C. Suggested Northern Cook Inlet sockeye salmon spawning escapement goal changes that have not been proposed in a timely manner by the Department. We have concerns.
- D. The habitat proposal requesting the Board of Fisheries to ~~lobby the Board of Fisheries~~ lobby the legislature to adopt habitat provisions contained in the Sustainable Salmon Fisheries Policy into Title 16. We do not support at this time.
- E. Agenda Change Request #6 We feel this does not meet agenda change criteria.

In April the Committee submitted Nonregulatory proposal "G" asking for "Yield" Stock of Concern designation for 6 Susitna River drainage king salmon stocks with established spawning escapement goals, but on October 12, 2016 the Committee decided, with no objection, to include testimony that the Board consider all Unit 2, Unit 3, Unit 5, and Unit 6 Susitna River drainage king salmon stocks for "Yield" stock of concern designation(s). Please refer to RC # which is the Department's yield / harvest and escapement figures for king salmon stocks in Units 2, 3, 5 and 8. Please note: Extremely low harvest in 2012 follow by no listed legal harvest allowed by emergency regulation in 2013, 2014, 2015, and again in 2016 (not shown on chart). The ADF&G Area Fisheries Manager foresees no allowable sport harvest from these river units again in 2017.

At our October 12 Committee meeting the ADF&G Manager mentioned that he knew of no time that the Department had recommended a stock for possible listing as "Yield" concern when that particular stock had not already missed an established spawning escapement goal for a period of 4 or 5 years. The objection by this committee member was that the Department was in reality only considering stocks that qualified for "Management" stock of concern — while the Sustainable Salmon Fisheries Policy clearly states:

5 AAC 39.222. Policy for the management of sustainable salmon fisheries

(1) at regular meetings of the board, the department will, to the extent practicable, provide the board with reports on the status of salmon stocks and salmon fisheries under consideration for regulatory changes, which should include

(ii) identification of any salmon stocks, or populations within stocks, that present a concern related to yield, management, or conservation; and

**(42) "yield concern" means a concern arising from a chronic inability, despite the use of specific management measures, to maintain expected yields, or harvestable surpluses, above a stock's escapement needs; a yield concern is less severe than a management concern, which is less severe than a conservation concern;**

The Department manager attempted to rationalize not considering either new tributary-based or Unit-wide Susitna drainage king salmon stocks for "Yield" concern designation by saying, 'At this time, the expected yield from these stocks is zero.'

The Committee, respectfully refers the staff and Board to carefully consider the portion of the SSFP definition that states . . . "to maintain expected yields, or harvestable surpluses, above a stock's escapement needs."

For Alaskans and visitors who have lost their legal opportunity to harvest even one Unit 2, Unit 3, Unit 5, or Unit 6 Susitna River king salmon for a period of 4 - 5 years this is a REAL yield concern. We are talking about ZERO in-Unit legal harvest.

While on the subject of salmon stocks that should be considered for "Yield" stock of concern designation, Advisory Committee members noticed that the Department left out mention of Jim Creek coho salmon in its Stock of Concern memo leading up to this meeting.

At the 2013 Board of Fisheries Work Session the Department brought up the subject of Jim Creek coho salmon for Board discussion as a potential "Management" stock of concern since the drainage had failed to reach the McRobert's Creek Index count escapement range minimum in 3 of the previous 5 years. In 2013 Jim Creek clearly did not qualify for "Management" stock of concern status, and therefore may have been an easier topic for the Department to discuss.

Why no mention of Jim Creek in the 2016 work session stock of concern memo? Despite regulatory action taken by the Board in 2014 and in season emergency closures to the sport salmon fishing in 2015 and 2016 the drainage has once again failed to attain the McRoberts Creek coho salmon minimum index count in 3 of the previous 5 years, but in addition, the recent 5-year average coho sport harvest has now dropped by 76% over the previous 10-year period. Not too long ago there were years where the Jim Creek coho salmon sport fishery topped the list for Northern Cook Inlet sport coho salmon harvest. Therefore, the Committee respectfully requests that the Board and Department give reasonable consideration of important Jim Creek coho salmon for potential "Yield" stock of concern designation. For Department generated Jim Creek yield / harvest data please see RC— —

Concerning the Departments Memo on salmon escapement goals, the Committee noticed and was concerned with the Department's recommendation to reduce sockeye salmon escapement goals for all 4 sockeye salmon stocks with established goals in Northern Cook Inlet. If commercial fisheries were to be actively managed to keep sockeye salmon escapement numbers below the recommended upper ends of these decreased escapement ranges it would likely have devastating impacts on sport, subsistence, and personal use harvests within Northern Cook Inlet waters and drainages. It was also mentioned at our Committee meeting, that a memo, only made public, after the first public comment deadline, hardly seems adequate public notice for proposed new escapement goals. Department generated escapement goal proposals should be submitted in accordance with the proposal deadline and included in the proposal book for the public, including Fish and Game Advisory Committees, to consider. Below is the standard in 5 AAC 39.223. Policy for statewide salmon escapement goals

(b) The board recognizes the department's responsibility to

(6) review an existing, or propose a new, BEG, SEG and SET on a schedule that conforms, to the extent practicable, to the board's regular cycle of consideration of area regulatory proposals;

Therefore, if new escapement ranges are to be considered to replace the established Northern Cook inlet sockeye goals, clear forthright proposals should be issued in time for meaningful public debate, and the Department should follow the standards set in the Sustainable Salmon Fisheries Policy and the Policy for Statewide Escapement Goals. As the proposer, the Department should lead the discussion of likely harvest impacts on all user groups, and likely impacts on all Upper Cook Inlet stocks of concern, or potential stocks of concern if the goals were to be reduced as the Department advocates.

The Committee also heard testimony in favor of non regulatory proposal "N" and a motion was made to support. Several members expressed they had inadequate time to review this proposal, which was not included in the public proposal book. One member wondered how this proposal would impact his small gold mining permit, that is already difficult to obtain on an annual basis. Several Committee members were not certain what the exact wording of the proposal meant, and one member asked if the true intent of the proposal at this point was to request the Board of Fisheries lobby the legislature to include habitat provision from the Sustainable Fisheries Policy into Title 16. This indeed was the request. All except one Committee members were unwilling to support this proposal without knowing what the impacts would be. The Committee was opposed to the Board of Fisheries lobbying the legislature to include habitat provisions from the Sustainable Salmon Fisheries into Title 16 at this time.. Committee members saw value in allowing some future uses or developments to continue that could have impacts on salmon and their habitats. Proposal opposed 1-13-0.

The Advisory Committee also considered Agenda Change #6. The Committee member most interested in this proposal believed Agenda Change #6 simply did not meet the criteria for an agenda change. The Committee agreed unanimously and the proposal was opposed. 0-14-0.

Thank you for Listening,



Andrew N. Couch, secretary

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*Yield by management units*

Eastside Susitna River drainage Chinook salmon harvest by management unit, 2011-2015

|           | Parks Hwy | Upper Susitna | Talkeetna | Chulitna |
|-----------|-----------|---------------|-----------|----------|
| Year      | Unit 2    | Unit 3        | Unit 5    | Unit 6   |
| 2011      | 1,078     | ²             | 1,087     | 113      |
| 2012      | 34        | ²             | 113       | 0        |
| 2013      | 0         | ²             | 0         | 0        |
| 2014      | 0         | ²             | 0         | 0        |
| 2015      | 0         | ²             | 0         | 0        |
| 2011-2015 |           |               |           |          |
| Mean      | 222       |               | 240       | 23       |

² Statewide harvest information not available likely due to low number of respondents.

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# Yield By Tributary Streams

## Appendix A5. Eastside Susitna River drainage Chinook salmon harvest by fishery, 1977-2015.

| Year      | Willow Creek | Lt. Willow Creek | Kashwitna River | Caswell Creek | Sheep Creek | Goose Creek | Montana Creek | Birch Creek | Sunshine Creek | Talkeetna River <sup>a</sup> |
|-----------|--------------|------------------|-----------------|---------------|-------------|-------------|---------------|-------------|----------------|------------------------------|
| 1977      | 137          | 16               |                 |               | 259         |             | 415           |             |                | 25                           |
| 1978      | 47           | 0                |                 |               | 256         |             | 408           |             |                | 12                           |
| 1979      | 459          | 0                |                 | 156           | 10          |             | 312           |             | 10             | 312                          |
| 1980      | 289          | 32               |                 | 215           | 45          |             | 559           |             | 13             | 172                          |
| 1981      | 585          | 0                |                 | 249           | 0           |             | 661           |             | 57             | 373                          |
| 1982      | 629          | 0                |                 | 471           | 0           | 0           | 241           | 0           | 52             | 450                          |
| 1983      | 534          | 0                | 231             | 272           | 0           | 0           | 504           | 0           | 105            | 934                          |
| 1984      | 774          | 37               | 0               | 586           | 0           | 0           | 1,522         | 0           | 125            | 1,272                        |
| 1985      | 1,063        | 25               |                 | 527           | 0           | 0           | 979           | 0           | 771            | 871                          |
| 1986      | 1,017        | 872              | 73              | 327           | 1,778       | 145         | 2,796         | 290         | 327            | 908                          |
| 1987      | 1,987        | 711              | 116             | 88            | 1,610       | 334         | 1,726         | 44          | 319            | 1,639                        |
| 1988      | 2,349        | 937              | 0               | 578           | 1,847       | 218         | 1,070         | 28          | 303            | 1,762                        |
| 1989      | 2,846        | 507              | 11              | 357           | 1,116       | 385         | 1,708         | 28          | 368            | 2,372                        |
| 1990      | 3,237        | 387              | 6               | 330           | 1,537       | 504         | 478           | 0           | 465            | 2,358                        |
| 1991      | 3,208        | 684              | 41              | 305           | 1,519       | 288         | 575           | 47          | 230            | 2,025                        |
| 1992      | 8,884        | 1,023            | 16              | 592           | 2,663       | 1,033       | 3,078         | 101         | 365            | 3,338                        |
| 1993      | 8,626        | 1,200            | 38              | 531           | 2,300       | 633         | 4,054         | 9           | 280            | 4,729                        |
| 1994      | 5,980        | 745              | 78              | 562           | 1,349       | 361         | 3,111         | 108         | 297            | 2,144                        |
| 1995      | 2,742        | 436              | 18              | 397           | 746         | 226         | 1,004         | 0           | 132            | 2,126                        |
| 1996      | 2,690        | 896              | 21              | 128           | 1,397       | 437         | 1,612         | 22          | 53             | 3,585                        |
| 1997      | 3,135        | 699              | 10              | 30            | 550         | 298         | 2,181         | 30          | 53             | 3,800                        |
| 1998      | 2,793        | 546              | 15              | 226           | 700         | 348         | 1,471         | 83          | 116            | 3,846                        |
| 1999      | 4,988        | 1,344            | 83              | 142           | 2,558       | 371         | 3,279         | 134         | 11             | 3,701                        |
| 2000      | 3,782        | 578              | 160             | 561           | 851         | 258         | 1,728         | 223         | 472            | 2,740                        |
| 2001      | 4,573        | 941              | 74              | 238           | 1,420       | 160         | 2,646         | 65          | 93             | 2,866                        |
| 2002      | 3,591        | 580              | 217             | 115           | 928         | 403         | 2,026         | 35          | 38             | 2,616                        |
| 2003      | 3,922        | 510              | 373             | 26            | 1,284       | 350         | 1,242         | 167         | 154            | 1,276                        |
| 2004      | 2,818        | 445              | 125             | 23            | 914         | 335         | 1,071         | 0           | 25             | 2,473                        |
| 2005      | 2,466        | 621              | 112             | 394           | 878         | 150         | 1,328         | 287         | 205            | 1,960                        |
| 2006      | 2,141        | 449              | 210             | 264           | 707         | 27          | 1,672         | 97          | 211            | 1,561                        |
| 2007      | 2,258        | 870              | 223             | 190           | 964         | 31          | 1,294         | 0           | 0              | 2,476                        |
| 2008      | 1,101        | 505              | 237             | 30            | 589         | 134         | 1,188         | 46          | 431            | 1,479                        |
| 2009      | 499          | 85               | 212             | 17            | 393         | 0           | 257           | 0           | 0              | 1,982                        |
| 2010      | 218          | 169              | 214             | 0             | 153         | 0           | 371           | 26          | 56             | 1,013                        |
| 2011      | 282          | 33               | 172             | 0             | 213         | 0           | 362           | 0           | 16             | 1,087                        |
| 2012      | 13           | 0                | 8               | 0             | 0           | 0           | 13            | 0           | 0              | 113                          |
| 2013      | 0            | 0                | 0               | 0             | 0           | 0           | 0             | 0           | 0              | 0                            |
| 2014      | 0            | 0                | 0               | 0             | 0           | 0           | 0             | 0           | 0              | 0                            |
| 2010-2014 |              |                  |                 |               |             |             |               |             |                |                              |
| Mean      | 103          | 40               | 79              | 0             | 73          | 0           | 149           | 5           | 14             | 443                          |
| 2015      | 0            | 0                | 0               | 0             | 0           | 0           | 0             | 0           | 0              | 0                            |

<sup>a</sup> Talkeetna River and tributaries including Clear Creek.

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Coho Salmon effort, harvest, escapement Jim Creek Drainage  
1993 - 2006

|      | Effort | Harvest            | McRoberts <sup>a</sup> Creek | Upper Jim Creek | Total Index | Weir Count |
|------|--------|--------------------|------------------------------|-----------------|-------------|------------|
| 1993 | 6,824  | 2,878              | 503                          | 535             | 1,038       | 5,532      |
| 1994 | 9,658  | 3,946              | 506                          | 2,119           | 2,625       | 6,451      |
| 1995 | 10,893 | 3,549              | 702                          | 1,288           | 1,990       |            |
| 1996 | 7,561  | 3,911              | 72                           | 439             | 511         |            |
| 1997 | 5,349  | 1,786              | 701                          | 563             | 1,264       |            |
| 1998 | 5,272  | 4,197              | 922                          | 560             | 1,482       |            |
| 1999 | 6,860  | 2,612              | 12                           | 320             | 332         |            |
| 2000 | 10,975 | 5,653              | 657                          | 2,561           | 3,218       |            |
| 2001 | 13,028 | 8,374              | 1,019                        | 575             | 1,594       |            |
| 2002 | 17,989 | 14,707             | 2,473                        | 1,630           | 4,103       |            |
| 2003 | 13,474 | 6,415              | 1,421                        | 393             | 1,814       |            |
| 2004 | 19,342 | 11,766             | 4,652                        | 1,045           | 5,697       |            |
| 2005 | 19,605 | 10,114             | 1,464                        | 1,883           | 3,347       |            |
| 2006 | 25,271 | 19,259             | 2,389                        | 1,750           | 4,139       |            |
| 2007 | 21,342 | 11,848             | 725                          | 1,150           | 1,875       |            |
| 2008 | 27,874 | 17,545             | 1,890                        | 1,029           | 2,919       |            |
| 2009 | 16,486 | 11,573             | 1,331                        | 1,193           | 2,524       |            |
| 2010 | 16,140 | 8,442              | 242                          | 420             | 662         |            |
| 2011 | 9,810  | 3,132 <sup>b</sup> | 261                          | 229             | 490         |            |
| 2012 | 7,474  | 1,858 <sup>b</sup> | 213 <sup>c</sup>             | 495             | 708         |            |
| 2013 | 8,474  | 3,258              | 663                          | 1,029           | 1,692       |            |
| 2014 | 9,376  | 3,045              | 122                          | 618             | 740         |            |
| 2015 | 3,425  | 2,910 <sup>b</sup> | 571                          | 374             | 945         | 3,572      |
| 2016 |        | <sup>b</sup>       | 106                          | 307             | 413         | 1,764      |

|           |        |        |       |       |       |  |
|-----------|--------|--------|-------|-------|-------|--|
| 2001-2010 |        |        |       |       |       |  |
| mean      | 19,055 | 12,004 | 1,761 | 1,107 | 2,867 |  |
| 2011-2015 |        |        |       |       |       |  |
| mean      | 7,712  | 2,841  | 366   | 549   | 915   |  |

<sup>a</sup> SEG 450-700

<sup>b</sup> fishery restricted or closed early.

<sup>c</sup> foot survey conducted late.

76% Decline

October 18, 2016

Personal Alaska Board of Fisheries Testimony on Susitna Sockeye salmon status

Chairman Jensen and Members of the Alaska Board of Fisheries.

My Name is Andrew Couch, I am a Sportfishing guide who works on multiple salmon streams in the Mat-Su Valley, I am also a member of the Matanuska Susitna Borough Fish and Wildlife Commission, and a member of the Matanuska Valley Fish and Game Advisory Committee. I am submitting this testimony as my own personal testimony in support of Nonregulatory Proposal F that was submitted by the Matanuska-Susitna Borough Fish and Wildlife Commission.

Proposal F seeks to elevate the Yield stock of concern designation for Susitna River sockeye salmon to a Management stock of concern designation or to revise the action plan to include stronger conservation measures. The current minimum escapement goal levels for each of the 3 Susitna drainage tributary weirs have only been achieved one time in the past 7 years. In addition inseason emergency sport fishing closures have occurred the past two years at Larsen Creek in efforts to attain adequate escapement goal needs, and the Shell Lake sockeye salmon population is on the verge of extinction. The Susitna sockeye salmon Yield stock of concern designation occurred back in 2008 — more than the 5 years mentioned in the Sustainable Salmon Fisheries Policy under which improvements should be seen.

In addition, because of budget cuts the Department eliminated Judd Lake weir sockeye salmon escapement counting from their 2016 budget, so documentation of inadequate escapements may have disappeared at this location — although low sockeye salmon production likely persists. Another troubling development is that during a time of low production, and failure to attain ADF&G identified spawning escapement minimum numbers, the Department is now suggesting that all 3 Susitna River sockeye salmon escapement goals should be reduced. Such a policy change could likely accelerate sockeye salmon declines in the less productive riparian sockeye salmon habitat within the drainage. I encourage the Board to take a broad look at sockeye salmon status throughout the Susitna River drainage and see if it does not indeed call for a designation of Management stock of concern or at least for more precautionary action plan measures.

Thank you for the opportunity to express my concerns,



Andrew N. Couch