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Mr. Glenn Haight,
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Alaska Board of Fisheries
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ATTN: Board of Fisheries Comments for Upper Cook Inlet Finfish

Dear Mr. Haight and Chairman Johnstone:

The Alaska Salmon Alliance (ASA) wishes to provide supplemental comments to the Board of Fisheries in response to PC 300, submitted by Senator Dunleavy and provided to the Board on January 31, 2013. ASA greatly appreciates the sincere interest that the Senator has in restoring MatSu Valley drainage salmon runs and we wish to share our perspective on his long term solutions and to provide alternatives for consideration.

- 1). Extension of the Board of Fisheries Proposal deadline: Is it really necessary to extend the Board of Fisheries long established deadline of April 10th for submission on proposals to meet the Legislators' 90 day work schedule? If the public has to plan their annual working calendar around the deadline, it seems appropriate that Legislators can also meet the same deadline, unless there is some political advantage for the Alaska public in advancing the deadline to follow the session?
- 2). The need for the Board to consider the hiring of professional staff person for economic analysis, based on the NPFMC model: Although contracting an economist to conduct economic analyses of major proposals at first glance would appear to be a positive idea, there is a major difference between the North Pacific Council process and the Board of Fisheries process. The Council has a process for prioritizing proposals for consideration, and following that, there is an additional layer of selectivity before the proposal is prioritized for socio-economic analysis. Given the thousands of proposals that the BOF entertains in its "open book" process, for it to engage in an initial prioritization process, and to then streamline the priorities to a select few for economic analysis would

be a time consuming and controversial public process. An economist can only undertake one or two economic analyses at a time, each one taking months to develop.

3). ASA and the entire commercial salmon sector involved in Cook Inlet salmon fisheries share the interest in rebuilding salmon runs in the Susitna and other west side streams, along with Kenai kings. To this end the ASA and the Cook Inlet Aquaculture Association, representing virtually all commercial user groups in the Cook Inlet Region, including the Mat-Su Borough, joined with the Mat-Su Fish and Wildlife Commission and the Kenai River Sportfishing Association in sponsoring a joint letter to the Alaska Legislature supporting three common research goals in March of 2013. The joint letter was instrumental in securing over \$7 million in research and enhancement funds to rebuild salmon stocks in the Mat-Su Valley. The bulk of the funds were expended for research, in lieu of stocking streams and Pike control and elimination. As we will learn, this is part of a Mat-Su agenda.

In reference to Mr. Dunleavy's comment that "It is not productive to continue the Cook Inlet Fish Wars, nor will much long lasting change occur until all sides come together and make a concerted effort to reach consensus": I find this statement to be disingenuous, and contradicted by statements I repeatedly encounter in my numerous conversations with all but a few sportfishing constituents in the Valley. First of all, Mr. Dunleavy's fisheries staff person is well aware of ASA's widely publicized efforts to initiate all sector collaborative discussions in search of long term solutions. However, there has been no followup from the Senator to demonstrate leadership, or a willingness to initiate dialogue.

Second, true sportfish interests in the Valley cannot understand why Mr. Dunleavy, the Commission, the Borough and the Mat-Su delegation do not cut to the chase and use their collective legislative leadership to prioritize funding for reduction of the Pike population and predation, beaver dam notching and wild stock enhancement of numerous streams. There is not a word of support in Mr. Dunleavy's letter for time proven specific enhancement solutions that can accelerate rebuilding of salmon stocks in the MatSu rivers and streams.

The same people who support salmon enhancement also support negotiating long term solutions, as does the ASA. A growing number of these persons confide in me that the leadership in the Valley is actively thwarting ADFG, and Borough action to implement aggressive stocking programs in the rivers—until the drift and set net fleets are eliminated by regulation—while at the same time they are publicly talking collaboration. They actually fear that positive rebuilding results will deter or interfere with the goal of elimination of the fleets, under the theory that the fleets, not Mat-Su habitat and in-river overfishing are issues. By engaging in this Machiavellian course of action, they are both inhibiting the rebuilding of precious salmon stocks and the economic recovery of the sportfish-based tourism industry in the valley.

Next in Mr. Dunleavy's letter, we are confronted with another outlandish statement: "If the Department and Board do not establish well-based escapement goals for ALL Cook

Inlet tributaries my objective will not be sustainable over the long haul. " What does this mean, other than a veiled threat of legislation or a ballot initiative aimed at elimination of the commercial fleets—unless the Board of Fisheries and ADFG succumb to the political demands of a few Mat-Su Valley residents.

Mr. Dunleavy goes on further to prescribe with scientific certainty: "If the Board in its allocative decisions, does not assure passage of salmon to meet mid-level escapement THROUGHOUT THE SYSTEM, we will be unnecessarily risking the continued production of those rivers and lakes." Standardized, scientifically peer reviewed minimum escapement goals (which include conservation buffers) are apparently inadequate for Valley experts. They also do not seem particularly concerned that the commercial fishing restrictions they want would put at-risk the continued production of Kenai River and Kasilof River sockeye salmon, with measurably greater economic impacts.

Mr. Dunleavy's opinions are not supported by any of the science or literature from the Department, bringing his credibility into question. The threats and misinformation he presents are part of his agenda to eliminate commercial fisheries. That agenda is the source of the so-called "fish wars" in Cook Inlet.

Proposals Addressed

Proposal 103

Proposal 103 further restricts adaptive management, and it undermines the Dept's ability to make in-season decisions.

The application of the language in this proposal could eliminate commercial fisheries. This is clearly the goal of the author.

There is no methodology for measuring the effects of commercial fishing restrictions. There is no way to determine cause and effect. It is virtually impossible to connect a restriction on the drift fleet in mid-July to some variance in escapement to a stream in the Mat-Su that isn't counted until 30-60 days later.

The geographic and temporal distribution of salmon stocks in the Cook Inlet is on a scale that prohibits the measurement of escapement in time to affect or adjust management decisions.

Escapement goals must be scientifically defensible.

Sustained over-escapements are more damaging than under-escapements to salmon stocks and to the economies that are built around the harvest of those stocks.

The ADF&G is eliminating some escapement goals due to budget restraints.

Some methodologies used for measuring escapements are so flawed that actual escapement numbers will never be known, as in Bendix and DIDSON counters for sockeye in the Susitna River, Bendix and DIDSON counters for both sockeye and Chinook in the Kenai River.

Errors in methodologies used for enumeration may not be detectable until after a run is passed or in some cases several years later or, as in the Susitna River, over 20 years later.

Run timing, water levels, water temperatures and countless other variables affect the movement of fish, escapement goals should have some flexibility to allow these variances to play out.

The example of this is the Deshka coho run in 2013, the water temperature was very high and the coho spawners held in the mainstream below the weir until a rain event occurred. The water cooled down, and within 48 hours over 10,000 coho went past the weir.

Proposals that restrict the drift fleet to the corridor:

The commercial fishing industry requires the opportunity for an orderly harvest. We need regular openings and adaptive, abundance based management to operate with the greatest efficiency, and in order for processors to produce a premium product for market. For example, on average it takes the drift fleet 10 full days of fishing in the corridor to harvest the equivalent catch of 1 full Inlet opening. In 2011 those extra days in the corridor actually increased commercial harvest percentage of Susitna sockeye. That was not only inefficient, it was contrary to the intent of the restriction.

The genetic stock identification work the ADF&G is doing shows that from 2008 – 2013, the drift fleet's harvest of Susitna sockeye went up 26% from the previous 5 year average, in spite of having additional area restrictions to the corridor during that time. The restrictions do not accomplish the purported objective.

There is no methodology for measuring the effects of commercial fishing restrictions. There is no way to determine cause and effect. It's impossible to connect a restriction on the drift fleet in mid July to some variance in escapement to a stream in the Mat-Su that isn't counted until 30-60 days later.

During the decades that area restrictions were placed on the drift fleet to conserve northern stocks, no studies were ever done and no evidence of data was ever generated to show that the restrictions had any effect on escapements.

Mr. Dunleavy made a particular request that "The Board should not overlook that when the Department opened Area 1 last season, the cohos were absolutely slammed." This particular opening occurred as a direct result of he and his staff interfering with regional management, and specifically demanding a restricted opening on that date, in that area. A regular opening would have spread the fleet throughout the inlet. Instead, the fleet ended up concentrated in an area where coho happened to be present. As a direct result of their interference the fleet caught an above average number of coho. This illustrates what happens when ill-informed, politically motivated, so-called "fish experts" manage the fishery.

Habitat Issues:

ADF&G's 2012 *Upper Cook Inlet Management Report 2012* clearly stated that:
"...unless the impacts from pike predation, disease and beaver dams can be significantly

reduced, the total sockeye salmon production in the Susitna River drainage will continue to suffer, regardless of the amount of restrictions placed on commercial fisheries.”

In 2013 ADF&G published *A Comprehensive Inventory of Impaired Anadromous Fish Habitats in the Matanuska-Susitna Basin, with Recommendations for Restoration* wherein the Habitat Research and Restoration Staff described habitat problems affecting salmon production and recommended restoration and research projects totaling over \$8.5 million. Many of these projects are only assessing damage or will require annual funding so the actual cost of restoration is yet to be determined.

Within the Sustainable Salmon Fisheries Policy, a new level of concern needs to be added - “a stock of habitat concern” - defined as “a concern arising from the inability of salmon to successfully spawn and rear in their freshwater habitats as a result of invasive species, parasites, pollution, migration impedances or other habitat disturbances.” This would enable the Board of Fisheries and ADF&G to focus their efforts on the cause of declining salmon runs, not just the effects. A new action plan should be developed that will help stabilize salmon production in systems that are still functioning, work towards eliminating pike from other systems, set goals for removal of migration impedances and develop a restocking program.

Problems with Susitna salmon production have been identified and are the result of freshwater habitat issues.

Intensive management of saltwater fisheries will never solve the problems found in the freshwater habitats of spawning and rearing salmon.

Discreet Fishery Harvest Zones (the Bristol Bay sockeye salmon model):

Cook Inlet is not Bristol Bay. There is neither the harvesting capacity nor processing capacity to conduct a commercial fishery in terminal areas in Cook Inlet. This would only serve to increase the commercial harvest of king salmon and further illustrates an ill-informed view of fisheries management and a Mat-Su-centric perspective on Cook Inlet salmon management.

Arni Thomson
Executive Director
Alaska Salmon Alliance



cc: Senator Charlie Huggins
Representative Mike Chenault
Senator Kevin Meyer
Senator Pete Kelly
Senator Anna Fairclough
Senator Mike Dunleavy
Senator Click Bishop
Senator Donny Olson
Senator Lyman Hoffman
Senator Cathy Giessel

Senator Peter Micciche
Senator Fred Dyson
Senator Bert Stedman
Representative Eric Feige
Representative Alan Austerman
Representative Bill Stoltze
Representative Mark Neuman
Representative Mia Costello
Representative Bryce Edgmon
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Commissioner Cora Campbell, ADFG
Stefanie Moreland, Fisheries Advisor to the Governor
Jeff Regnart, Director of Commercial Fisheries, ADFG
Charlie Swanton, Director of Sport Fisheries, ADFG