February 24, 2024 Steve Reifenstuhl

Board of Fisheries
UCI Meeting February 2024
Anchorage, Alaska

Re: Proposal 43 5 AAC 40.820 Basic Management Plans

Dear Chairman Wood and Board Members:

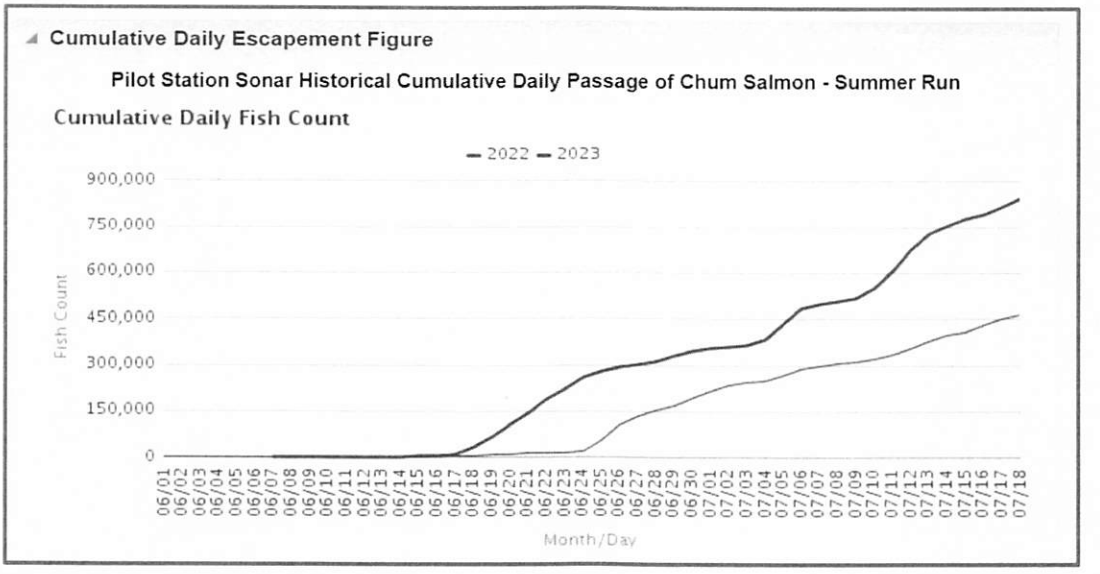
On behalf of the PNP Hatchery Associations I submit these comments on Proposal 43 which was submitted by the Fairbanks Fish and Game Advisory Committee. First and foremost, this proposal has statewide aspirations and statewide implications. The proposal is predicated on the statement: "reduce production to 25% of the year 2000 production as promised in the 2000", quoted here verbatim. There was no promise, written or verbal, in 2000 or in any previous or subsequent year. The proposal is therefore based on a fiction and attempts to use this fiction as a rationale for some action that is ill-defined. Of the five paragraphs in Proposal 43, four focus on erroneous or non-demonstrable evidence, while only paragraph #4 speculates about marine productivity and escapements in AYK and Cook Inlet regions. Additionally, the proposal refers to 'productivity cycle'. A cycle has ups and downs by definition, which is exactly what salmon stocks have demonstrated throughout human history. Proposal 43 admits the systems they refer to are "currently in a very low cycle". However, even this statement is not entirely accurate. I will explore each of these regions referenced in the proposal separately using ADF&G reference materials.

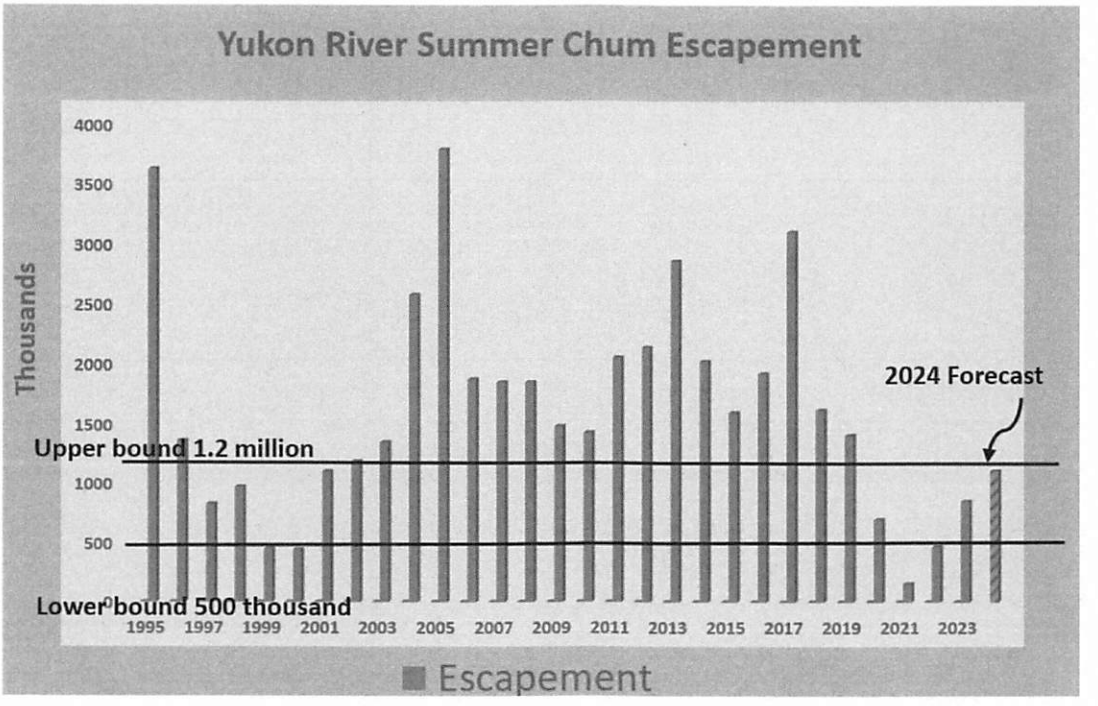
AYK Region

The Yukon River summer run escapement in 2022 was 450,000 while in 2023 the escapement was 845,000 chum, 300,000 summer chum above what was forecast for 2023[1]. In terms of productivity

[1] Graph source: https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon_escapement

cycles, the Yukon and Kuskokwim Rivers were in a low cycle in 2021 and 2022. Low productivity cycles were also documented in 2000/2001 on the Yukon River, although summer chum runs were over 2.5 million by 2005 and the Yukon did not experience another low cycle until 2020.[2] All salmon stocks in Alaska fluctuate, sometimes dramatically, and these cycles are often strongly linked to



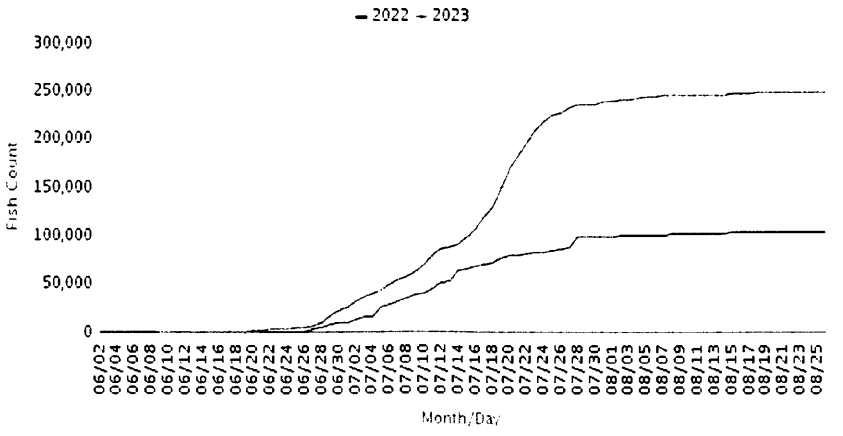


[2] https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon_escapement

regional ocean conditions or the Pacific Decadal Oscillation (PDO). Pacific Ocean gyres shift favoring Alaska stocks for one to three decades, then shift favoring southern stocks in the Pacific Northwest.

In 2023, Yukon chum escapement was 845,000 summer chum, well within the ADF&G escapement bounds of 500,000 to 1.2 million. Due to the higher escapement in 2023, summer run chum subsistence salmon fishing was open in Yukon districts 1-4 and 5 ABC in summer 2023.[3] Summer chum do not extend significantly beyond subdistricts 5 ABC. The Department of Fish and Game (ADF&G) is confident that Yukon River summer chum escapements fell within the drainage-wide escapement goal range, although final review of data is not available at this time. Kuskokwim chum returns also rebounded in 2023[4]:

Cumulative Daily Escapement Figure



[3] https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1506817489.pdf

[4] https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareakuskokwim.emihd

Subsistence and commercial fishing were open on the Kuskokwim in 2023.[5] Thus, the situation has improved significantly for chum since 2022 and there is no new evidence of an additional conservation concern.

Proposal 43 is lacking in causal evidence or a clear rationale for their position. As for the Western Alaska rivers where chum and chinook runs suffered most in 2021 and 2022, there is quite an abundance of scientific evidence available, both mechanistic and significant, linking poor survival of Coastal Western Alaska (CWAK) chum to the warm ocean years 2016 – 2019 when these stocks were juveniles and young adults. Collaborative work conducted by International Year of the Salmon (IYS), NOAA Fisheries, and ADF&G Coastal Program found that CWAK genetic stock group chum sampled in both the Bering Sea and the North Pacific Ocean were in poor condition with low fat reserves and few prey items in their stomachs. This was also true for many Alaska chum stocks from S.E. Alaska to AYK during those years. [6,7]

Cook Inlet Region

Proposal 43 states "most of Cook Inlet stocks are not meeting escapement goals". This statement is demonstrably untrue based on LCI escapements from 2022 ADF&G report. [8]

The ADF&G 2022 report is one example of information easily attainable that was ignored or does not fit their narrative. There are also similar reports for UCI both from commercial and sport divisions. This is not to say all escapements have been met or that there are not serious problems, particularly with Chinook salmon where four stocks are listed for concern. McNeil River is the only chum stock in Cook

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[5] https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1528358401.pdf; https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1529956606.pdf

[6] https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/hatchery/1-overview-of-scientific-understanding-of-salmon-competition-at-sea-and-an-update-on-research.pdf

[7] https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2022-2023/peninsula/11%20Marine%20research%20Overview.pdf

[8] https://www.adfg.alaska.gov/FedAidPDFs/FMR23-04.pdf

Inlet that is listed as a stock of concern. The 2022 UCI and 2023 LCI reports were not available at time of this writing, so tables are presented from available reports on ADF&G website December 17, 2023.

Table 6.–Escapements relative to escapement goals and methods used to monitor escapements in 2022 for chum, pink, and sockeye salmon stocks in Lower Cook Inlet Management Area, Alaska.

	2022	Escapement goal range			Monitoring method				
Stock	Escapement	Lower	Midpoint	Upper	Aerial	Ground	Video	Weir	Comments
CHUM SALMON (12 with goals)									
Port Graham River	606	1,200	1,950	2,700		X			
Dogfish Lagoon	3,319	3,500	6,050	8,600	X	X			used ground index
Rocky River	5,580	1,500	2,950	4,400	X				
Port Dick Creek	2,817	1,900	3,100	4,300	X	X			used ground index
Island Creek	2,822	5,100	8,500	11,900	X	X			used ground index
Big Kamishak River	13,013	6,800	11,200	15,600	X				
Little Kamishak River	22,330	8,000	12,400	16,800	X				
McNeil River	17,739	24,000	36,000	48,000	X				
Bruin River	3,948	5,200	7,600	10,000	X				
Ursus Cove	6,977	5,900	8,000	10,100	X				
Cottonwood Creek	6,588	5,200	8,700	12,200	X				
Iniskin Bay	12,740	5,900	9,750	13,600	X				
PINK SALMON (18 with goals)									
Humpy Creek	2,055	17,500	34,450	51,400		X			
China Poot Creek	145	2,500	4,400	6,300		X			
Tutka Creek	22,908	6,500	11,750	17,000		X			
Barabara Creek	3,492	2,000	3,800	5,600		X			
Seldovia Creek	16,999	21,800	29,600	37,400		X			
Port Graham River	9,193	7,700	13,700	19,700		X			
Dogfish Lagoon Creeks	11,596	800	3,950	7,100	X	X			used ground index
Port Chatham	7,126	7,800	12,950	18,100	X	X			used ground index
Windy Creek Right	17,380	3,400	7,300	11,200	X				
Windy Creek Left	39,094	5,400	16,250	27,100	X				
Rocky River	12,542	11,700	33,250	54,800	X				
Port Dick Creek	30,411	17,900	33,850	49,800	X	X			used ground index
Island Creek	8,550	9,600	21,050	32,500	X	X			used ground index
S. Nuka Island Creek	2,300	2,800	7,000	11,200	X				
Desire Lake	3,820	1,500	9,750	18,000	X				
Bruin River	330	17,800	60,400	103,000	X				
Sunday Creek	3,208	4,400	14,650	24,900	X				
Brown's Peak Creek	541	2,600	10,050	17,500	X				
SOCKEYE SALMON (8 with goals)									
English Bay	11,452	6,000	9,750	13,500				X	
Delight Lake[a]	22,777	7,550	12,575	17,650	X	X		X	weir count primarily
Desire Lake	20,460	4,800	8,350	11,900	X				
Bear Lake	9,961	700	4,500	8,300				X	
Aialik Lake	2,863	3,200	4,300	5,400	X				
Mikfik Lake	2,870	3,400	7,200	11,000			X		
Chenik Lake	16,461	2,900	8,300	13,700			X		
Amakdedori Creek	2,050	1,200	1,900	2,600	X				

[a] Used weir-based goal because Cook Inlet Aquaculture Association (CIAA) operated a weir at Delight Lake in 2022.

Another example of actual escapement data from UCI sockeye:[9] In 2021, of the five major UCI sockeye systems, four exceeded the upper escapement bound and two were within escapement bounds, none were below escapement bounds. The fundamental point is there is no linkage between hatchery pink salmon and poor returns to AYK or Cook Inlet.

[9] https://www.adfg.alaska.gov/FedAidPDFs/FMR22-16.pdf

Table 1.–Upper Cook Inlet sockeye salmon goals and passage, 2021.

System	Goal type[a]	Goal range Lower	Upper	2021 passage
Fish Creek	SEG	15,000	45,000	99,324
Kasilof River	BEG	140,000	320,000	521,859
Kenai River	Inriver	1,000,000	1,200,000	2,441,825
Larson Lake	SEG	15,000	35,000	21,987
Judd Lake	SEG	15,000	40,000	49,250
Packers Creek	SEG	15,000	30,000	19,975

Note: Escapement estimates do not account for any harvest above counting sites. BEG = biological escapement goal; SEG = sustainable escapement goal; OEG = optimal escapement goal.

These reports are public information and therefore available to the proposer, especially to an Advisory Committee which often has department management and research biologists in attendance.

AS 16.10.440 Issue

As for the proposer's statement "....the Attorney General ruled the Board does have the authority to regulate the number of eggs taken for production." That is certainly an opinion, but untested. AS 16.10.440(b) that Proposal 43 references was adopted in the mid-1970's when Alaska salmon stocks were at historical lows and the enhancement program was beginning. Taking eggs from a wild source was important to the department, primarily for escapement goals, while at the same time important to the Board of Fish because taking eggs/broodstock could be allocative. This was occurring at a time of extremely low salmon returns so every salmon was critical, both to harvesters and the principle of sustained yield. The statute 16,10.440 addressed the issue in this context.

Because this proposal lacks coherence and factual information, it is arbitrary and capricious, and therefore, should be rejected.

Respectfully submitted,

Steve Reifenstuhl