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Fish and Wildlife Commission  
Matanuska Susitna Borough  
Public Testimony  
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Federal management in the EEZ could devastate Northern District salmon stocks. Conservative management will likely not be implemented by federal managers, and therefore must be implemented by the state. This is particularly critical for this first year of federal salmon management in the EEZ.

NMFS will set time and harvest limits pre-season, with virtually no tools for in-season management to adjust to actual runs. Salmon harvest in the EEZ will be taken without regard to stock of origin in the mixed stock fishery.

The current NMFS proposal is for (2) twelve-hour drift gillnet fishing periods from June 15 to August 15. This doubles the drift fishing time in the EEZ for late July when sockeye and coho are returning to the Northern District. On page 15 of PC 138 is a quote by NOAA, from the Federal Register, that *“Stocks returning to freshwater systems farther north in Cook Inlet tend to stay close to the middle of the Inlet when they move through the EEZ”*.

The NMFS will allow fishing twice a week until August 15<sup>th</sup> or until a Total Allowable Catch (TAC) is reached. TACS are set by species – not by stock – and are based on a pre-season forecast developed by NMFS. No one knows how many salmon of any species have been caught in state versus federal waters, yet NMFS has had to make estimates of historical EEZ catches to develop a pre-season forecast as a basis for harvest. As of two weeks ago, the TAC harvest suggested by NMFS for sockeye salmon in the EEZ ranged from 1.3 million to 440,000 fish and for coho ranged from 39,000 to 25,000 fish. We have no idea where in that range they will land, but they must make and publish their decision by May 1.

NMFS has no tools to determine run size or abundance of stocks for fish within federal waters. NMFS has essentially no in-season management tools, only a pre-season forecast and a TAC set by salmon species. The Conservation Corridor was created by this board in 2011. NMFS appears to be on track to eliminate the benefits that the Corridor has brought to Northern District sockeye, and may make it even more difficult for Northern coho stocks to return to abundance.

As a result of these concerns the Mat-Su Borough Fish & Wildlife Commission recommends that the Board:

- Affirm a commitment to terminal stock fisheries management by limiting all drift gillnet fishing in state waters to the terminal harvest areas. This is a proven method to allow for stock specific harvest of Kenai and Kasilof sockeye while protecting less productive Northern District stocks.
- Reject any expansion of the drift gillnet fishery in state managed waters.
- Consider and adopt a Super Exclusive management system for waters managed by the State.

Thank you.

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