



MATANUSKA-SUSITNA BOROUGH

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Re: Fisheries of the Exclusive Economic Zone; Cook Inlet salmon; Harvest and Research 2025

The Matanuska Susitna Borough (MSB) Fish and Wildlife Commission (FWC) has been engaged with the NPFMC/NMFS process of management of salmon in the Cook Inlet Exclusive Economic Zone (EEZ) since 2023. In 2024, we recommended that proposed regulations reduce commercial drift gillnetting in the EEZ from two days a week to a single 12-hour period per week between July 16th and August 15th, the critical period when salmon are moving into the Northern District. In addition, that drift gear be reduced from 200 fathoms to 150 fathoms. We would like to thank NMFS for only opening the EEZ for a single 12-hour period each week between July 16th and August 1st 2024.

The FWC has reviewed the 2024 harvest results from the Alaska Department of Fish and Game (ADFG) and the National Marine Fisheries Service (NMFS). We also reviewed sections of the NMFS Stock Assessment and Fishery Evaluation (SAFE) report for the Cook Inlet Exclusive Economic Zone (EEZ) and the 2025 draft Environmental Assessment for Harvest Specifications for Cook Inlet Salmon Fisheries in the EEZ off Alaska (EA).

Of the Alternatives provided in the 2025 draft EA, the FWC prefers Alternative 1, the No Action Alternative, in which there would be no total allowable catch (TAC) set and no commercial fishing in the EEZ. However, given that this does not meet the “purpose and need”, the FWC supports Alternative 2, the status quo. We would amend Alternative 2 in the following ways:

- We encourage NMFS to only open the EEZ for a single 12-hour period between July 16th and August 15th 2025.
- We recommend that drift gillnet gear be reduced to 150 fathoms.

Additionally,

- We strongly support the reduction of Acceptable Biological Catch (ABC) for coho to 6,701 fish in 2025.

- We encourage NMFS to conduct research to fill data gaps on salmon populations and migration timing that are now part of the NMFS management mandate.
- We recommend that enforcement be expanded to ensure all fish that are harvested in the EEZ are counted.

The FWC represents the interests of the MSB in the conservation and allocation of fish, wildlife and habitat and advises borough officials, state or federal agencies and other organizations with interests that may impact conservation of fish, wildlife, and habitat. Specifically, the FWC advises MSB officials, state, or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area encompassing 25,258 square miles, an area slightly larger than West Virginia. Approximately half of Alaska’s human population resides near the shores of Upper Cook Inlet (UCI). This includes the city of Anchorage (288,121 in 2021) an additional 110,000 plus residing in the MSB. This vast region contains more than 50,000 miles of mapped streams, and supports all five species of Pacific salmon. The MSB has invested millions in fish passage improvements, reopening more than 1,000 stream miles and 6,000 acres of lake habitat for salmon rearing and spawning.

Fishing Periods / Conservation Corridor

Throughout the UCI, there are commercial and sport fisheries, residents use dipnets for a personal use fishery, and four indigenous communities - Tyonek, Knik, Eklutna and Chickaloon – engage in subsistence, educational, or personal use fisheries. These fisheries are already fully allocated among the many user groups, but with careful conservative management and sustainable salmon populations there can be fair opportunity for people to access fishery resources.

All salmon bound for the MSB move through Cook Inlet. The “Conservation Corridor” is a net-free area in the Inlet that opens up when drift gillnetters are not fishing, which allows fish bound for the Northern District to move through the Central District. By limiting drift gillnetting to one 12-hour opening per week during the critical period, NMFS is helping to maintain the corridor.

The Northern Cook Inlet stocks are not as productive and much smaller than the Kenai and Kaslof stocks, and in many cases are not meeting escapement objectives. Over the past several years, king and coho salmon returns have reached historic lows; 2024 was no exception.

Actual escapement at Dëshka and Little Su weirs over a generation. The generation time is considered 6 years for kings and 4 years for coho. Asterisks are shown where data is incomplete due to flooding at the weir.

	Dëshka kings	Dëshka coho	Little Su coho
BEG or SEG	9,000-18,000 (BEG)	10,200-24,100 (SEG)	9,200-17,700 (SEG)
2024	3,741	642*	964*
2023	3,440	1,817*	3,439*
2022	5,440	No data	2,816
2021	18,674	No data	10,229
2020	10,638		
2019	9,705		

Extremely low levels of coho returns resulted in ADFG announcing an emergency closure of all sport coho salmon fishing in the *entire* Susitna and Little Susitna River drainages effective August 15th 2024. At the Deshka River, only 642 coho passed the weir and at the Little Susitna River, only 964 coho passed the weir, far below minimum escapement goals of 10,200 and 9,200 respectively.¹ Although these are incomplete escapement estimates because the weirs flooded out, the numbers are so low that it is not reasonable to expect escapement was met. These low returns reflect the situation throughout the MSB, as the Deshka is an indicator for the entire Susitna River drainage and the Little Su coho escapement has a high correlation with coho escapement throughout the Knik Arm drainage.

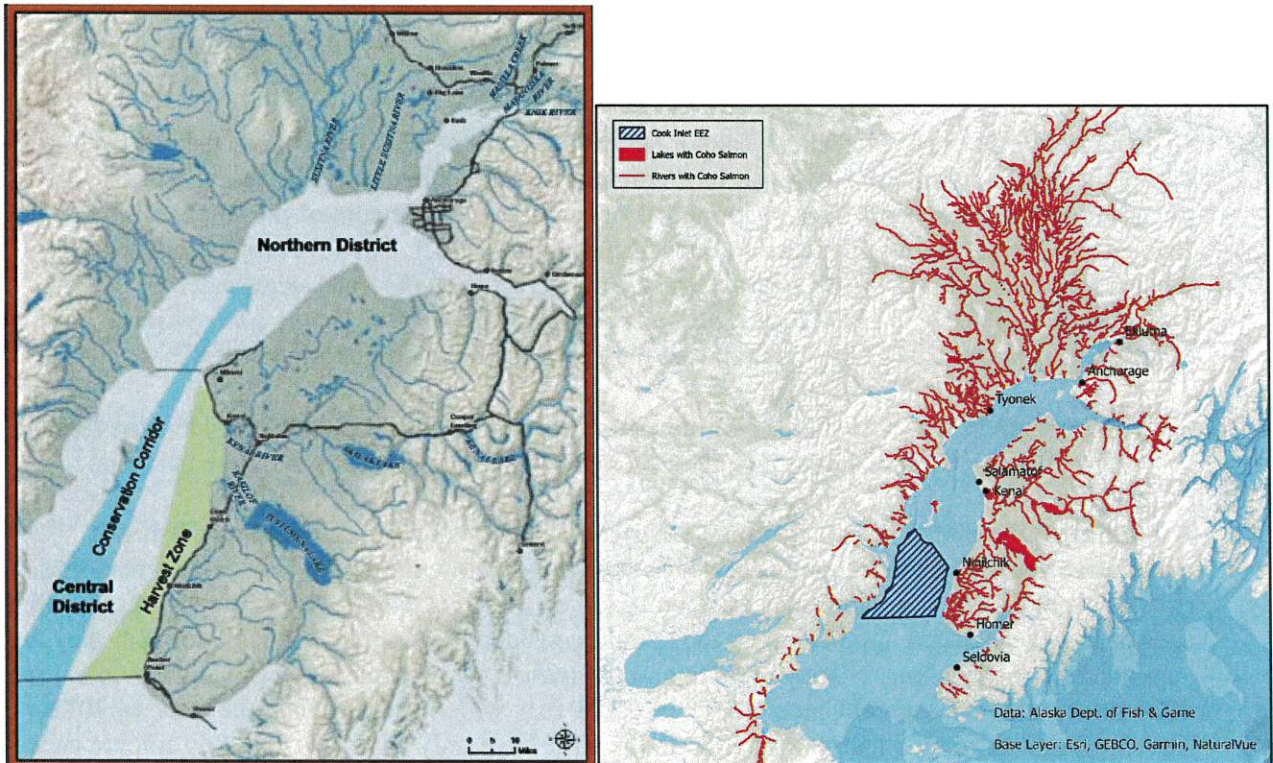


Figure 1. Left: When commercial fishing is limited to nearshore areas, a passage opens to allow salmon to migrate to the Northern District. Right: EEZ and streams that aggregate coho stocks return to.

The sustainable escapement goals (Little Su and Chuitna Rivers) and biological escapement goals (Deshka River) were not met for kings. As noted in the 2025 SAFE report 7.5.2.4, there are four Chinook Stocks of Concern in the northern part of Cook Inlet. Given recent escapement, there is an argument that all Chinook stocks in the Susitna drainage should be Stocks of Concern.

We appreciate the NMFS consideration of our comments in 2024, and their findings that *“Allowing salmon stocks of lower abundance bound for Northern Cook Inlet more opportunities to pass through the EEZ in July—particularly coho and Chinook salmon—means it is less likely the fishery will close early due to reaching the TAC for a stock of lower abundance before the drift gillnet fleet is able to harvest the TAC for abundant sockeye salmon. Additionally, spreading out the sockeye salmon harvest throughout the season by reducing fishing periods in late July will reduce pressure on Northern District sockeye salmon—which are Tier 3 stocks with less known conservation status”*

- We thank NMFS for only opening the EEZ for a single 12-hour period each week between July 16th and July 31st 2024, a critical period when salmon are moving into the Northern District. It is critical that NMFS maintain this single 12-hour opening each week and not expand commercial driftnet fishing in 2025 in the EEZ during this period.

Given the continued low escapements, particularly for coho and Chinook in 2024:

- We encourage NMFS to reduce the current two openings per week between August 1st and August 15th to a single 12-hour period each week in 2025 and all future years until escapement goals in the Susitna drainage are broadly met. This would enhance the effectiveness of a conservation corridor to allow salmon to migrate to the Northern District.

In general, Northern District stocks cannot have a determination of being “overfished” because escapement data is limited. However, they can be assessed to determine if “overfishing” occurred during the season. This is defined as occurring when the sum of the stocks EEZ harvests across a generation exceed the overfishing limit (OFL). NMFS recommends the OFL be “*the largest cumulative EEZ harvest across a generation in the timeseries under consideration and the 2025 OFL (preseason) is the average harvest for the same years...*”. This is different from the 2024 OFL, which used the “largest estimated historic harvest”.

- We support the 2025 method for determining the Tier 3 OFL_{pre} that considers the largest average EEZ harvest over a generation rather than the highest cumulative harvests.

According to the SAFE report, Northern District coho stocks can be declared overfished if cumulative spawning escapements are determined to be below minimum stock size threshold (MSST), and overfishing would be assessed based on the OFL. NMFS states that aggregate coho are not in an overfished condition, but they could consider a future recommendation that they are “approaching overfishing”. They recommend applying a 90% buffer to the pre-season OFL for a 2025 Acceptable Biological Catch (ABC) of 6,701 fish, which is lower than the ABC of 2024. They note that estimated harvests of coho in the EEZ have only been less than this amount twice since 1999. Recognizing the very low returns of these Northern District coho stocks in recent years combined with the possibility in the future of a determination of “approaching overfishing” it seems very wise and prudent to apply the ABC at 6,701 fish.

- We appreciate and support the increased buffer and reduced ABC for coho to 6,701 fish in 2025.

Gear and Enforcement

NMFS allows up to 200 fathoms of drift gear to be fished in the EEZ. By reducing this to 150 fathoms, NMFS would align with state of Alaska code (5 AAC 21.331). It also recognizes that salmon can move through an area in bursts, and would reduce the potential for exceeding a TAC in a single period.

- We recommend that drift gear in the EEZ be reduced to 150 fathoms.

We understand that NMFS inspections of vessels in the EEZ documented unrecorded fish in 2024, including kings.

- We support increased enforcement to ensure that all salmon caught in the EEZ are counted.

Research/data gaps

Unlike Kenai and Kasilof stocks, there is no real time assessment of salmon entering the Northern District. There are weirs on a handful of rivers, but they are not always operational due to lack of funding or flooding, resulting in incomplete data. NMFS recognizes this and notes;

“The NMFS SAFE Team recommends prioritizing future research to better characterize the abundance, timing, spatial distribution, and genetic stock composition of the coho salmon harvested in the CI EEZ fishery.”

The purpose of the Central District Drift Gillnet Fishery Management Plan is *“to ensure adequate escapement and a harvestable surplus of salmon into the Northern District and to provide management guidelines to the (Alaska) Department (of Fish and Game). The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District salmon and Kenai River coho salmon in order to provide all users a reasonable opportunity to harvest these salmon stocks over their entire run...”*

NOAA has a similar mandate concerning these stocks. The Magnuson-Stevens Act provides authority beyond the EEZ for all anadromous species throughout the migratory range of each such species.ⁱⁱ The primary research responsibility lies with NOAA Fisheries, which is required to conduct robust scientific studies to inform fishery management decisions, ensuring that all management plans are based on the best available scientific dataⁱⁱⁱ... and promote sustainable fisheries **by monitoring fish populations**, identifying essential fish habitat, and assessing the impacts of fishing activities on marine ecosystems.

The ADF&G in the past annually operated an offshore test fishery (OTF) near the southern boundary of the Upper Cook Inlet (UCI). The purpose of this test fishery was to estimate the sockeye salmon run returning to UCI. In 2012, an additional OTF was implemented to examine the spatial and temporal distributions of various sockeye and coho salmon stocks to identify migration routes and run timings of Susitna and other UCI salmon stocks. Neither of these important test fisheries are in operation today.

In our letters to the NPFMC/NMFS in 2024, we outlined the need for additional data to support NMFS management of Northern District stocks that cannot have escapement enumerated in real-time. Specifically, in order to establish a reliable TAC based on the proportional contribution of each stock to this fishery, better data must first be established:

- Test fisheries need to be reinstated to help determine return abundance and take place where Northern bound fish are most easily differentiated from Kenai bound fish.
- In-season genetic data and more robust escapement data is needed for salmon stocks of Northern Cook Inlet.

SUMMARY

In summary, we advocate for a single 12-hour opener per week during the critical July 16th- August 15th period in 2025; we support the new buffer for the 2025 coho ABC; we strongly advocate for NMFS to conduct research, including test fisheries and genetic studies to fill data gaps on abundance and run strengths of salmon bound for Northern District rivers; we recommend increased enforcement efforts; we request that NMFS reduce drift gear lengths from 200 fathoms to 150 fathoms; ; and we support the method for determining the OFL.

Sincerely,



Andy Couch
Chair, Matanuska-Susitna Borough Fish & Wildlife Commission

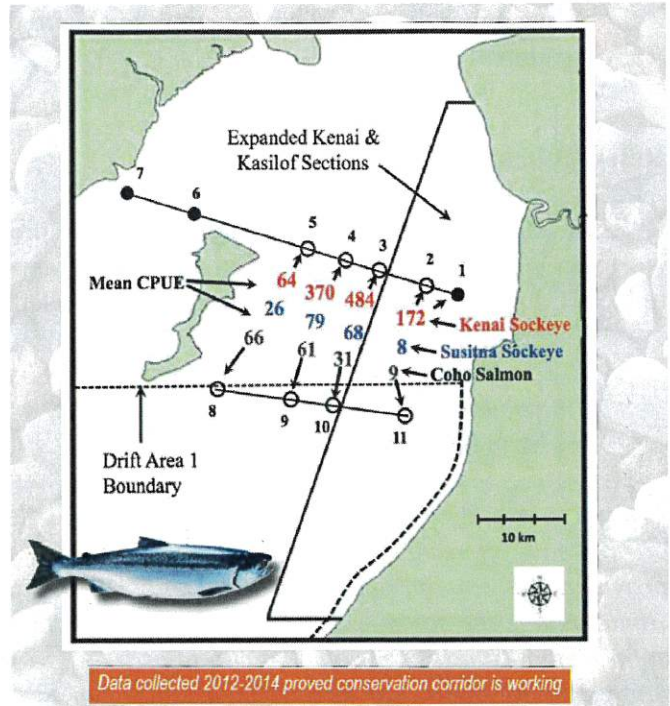


Figure 2. Results of offshore test fisheries conducted by ADFG.

ⁱ ADFG 2024 Upper Cook Inlet Commercial Salmon Fishery Season Summary, released Nov 13 2024

ⁱⁱ https://www.st.nmfs.noaa.gov/st1/fus/fus08/11_general2008.pdf

ⁱⁱⁱ <https://www.fisheries.noaa.gov/topic/laws-policies>

Cc's

Edna Devries, Mayor Matanuska-Susitna Borough
State of Alaska Doug Vincent-Lang, Commissioner, State of Alaska
Matanuska-Susitna Borough Assembly and Manager