



MATANUSKA-SUSITNA BOROUGH

Planning and Land Use Department

Planning Division

Fish & Wildlife Commission

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

www.matsugov.us

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Re: Fisheries of the Exclusive Economic Zone Off Alaska; Cook Inlet Salmon;
Amendment 16

After review of the SAFE report and careful consideration of the National Marine Fisheries Service's (NMFS) proposed Amendment 16 establishing a Federal managed fishery for all salmon fishing which occurs in the Cook Inlet Exclusive Economic Zone (EEZ), the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC) finds the proposed Fisheries Management Plan (FMP) seriously deficient for a variety of reasons and unanimously opposes the proposal.

- **All salmon bound for the MSB move through Cook Inlet.** To allow salmon to move into the MSB, drift gillnets are currently restricted by time (one 12-hour period per week) and area (all areas outside the terminal harvest zones) between July 15 and July 31. The proposed FMP does not consider run timing, and would expand fishing time and net length, reducing the ability of salmon to reach the MSB.
- The proposed FMP would develop total allowable catch (TAC) and annual biological catch (ABC) based on 5-year averages of salmon runs. This risks overfishing on weak run years, particularly without the ability of NMFS to respond quickly in-season.
- Using the low-end of escapement goals, the method used in developing spawner-recruitment ratios for the proposed FMP, was explained for the strong Kenai late-run sockeye but inexplicably expanded to be used in development of the overfishing limit (OFL) for ALL runs, including aggregate coho stocks which include known weak stocks moving to the MSB.

Cook Inlet is one of the longest marine inlets in the United States where salmon management is difficult and complex. The State of Alaska has developed large amounts of data, real-time analysis of various salmon runs, and maintains the ability to implement timely emergency closures or openings as the situation demands. NMFS does not currently have these tools or the flexibility that the state enjoys. Perhaps a change in the Magnuson-Stevens Act by Congress can provide the needed ability to make timely and critical decisions that are absent in the current proposed plan.

MSB streams and rivers are part of the Upper Cook Inlet system, and all salmon bound for the MSB move through Cook Inlet. Unlike the well-monitored Kenai and Kasilof salmon runs, the success of salmon spawning in MSB freshwater is not known until long after the salmon have moved into the Central District. This means conservative management must be in place.

Time and area restrictions of one 12-hour drift gillnet fishing period per week between July 16 and July 31 in areas outside the terminal harvest zone creates the "Conservation Corridor", the conservative management plan that allows salmon to move to the Northern District where they are available to Cook Inlet beluga whales, Northern District setnetters, and sport and personal use fisheries in the MSB. A large part of the Conservation Corridor lies within the EEZ. The Environmental Assessment Impact Review of Amendment 16 for the FMP explicitly states that the FMP must contain conservation measures. These measures are not evident in the proposed FMP.

The Conservation Corridor is outlined in the Central District Drift Gillnet Fishery Management Plan developed by the Board of Fisheries of the State of Alaska and has proven to be a key element in moving fish bound for the Northern Cook Inlet through the Central District. Recognizing the fact that these Northern Cook Inlet stocks are much smaller and in many cases are currently not meeting escapement objectives, necessitates there is a need to maximize the protections offered through the management plan and the subsequent "conservation corridor."

Because the Conservation Corridor includes the EEZ, the ability of the drift gill net fleet fishing in the EEZ to harvest large numbers of salmon, e.g., potentially harvesting 300,000 salmon per opening as noted in Amendment 16, causes concern. Especially when this potential could be realized during the critical period (July 16 to August 15) of moving fish through the Central District. Run timing has not been considered in the proposed FMP or in the SAFE report. Amendment 16 proposes two 12-hour periods each week on Monday from 7 a.m. until 7 p.m. and Thursday from 7 a.m. until 7 p.m. with no period of restricted fishing. As stated in the proposed Amendment 16,

"Fishing at a rate to fully harvest the most abundant stocks would likely result in overfishing on these weaker or less abundant salmon stocks ...the State has reduced the number of drift gillnet fishing periods in Cook Inlet EEZ waters after July 15 to minimize mixed stock harvests. "Page - 72323

The proposed two 12-hour fishing periods per week after July 15 would actually increase fishing time during the critical period as earlier described and could result in a greater harvest of northern bound salmon, resulting in fewer fish reaching this area. In addition, the proposed amendment also increases the length of legal drift gillnet gear from 150 fathoms to 200 fathoms, which by itself could dramatically increase the catch per unit of effort (CPUE).

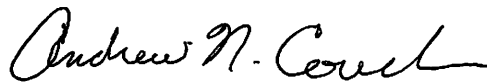
The methods applied to develop overfishing limits and ABC, as outlined in the SAFE report, do not consider the lower productivity of Susitna stocks. While a pair of Kenai sockeye may produce nine returning fish, a pair of Susitna sockeye will only produce three returning fish. As a fisheries manager, is reaching the lower escapement goal considered optimal to ensure future strong,

healthy runs? How is the lower escapement goal justified for smaller or weaker stocks?

The SAFE report uses a 5-year average run size to determine an ABC. However, these risks overfishing in years when there are small returns. This is an especially important point, again, for stocks headed to the MSB, as the actual returns will not be known until long after fish have (or have not) moved through the Central District. The SAFE report applies a Tier system and a buffer to liberalize (e.g. aggregate chum) or limit (e.g. aggregate coho) allowable catch. However, the proposed Tier 3 status (most conservative) and a 10% buffer as applied to aggregate coho actually allows *more* coho (36,000 as the ABC) to be caught than placing aggregate coho in Tier 2 with a 15% buffer (4,900 fish as the ABC) (pages 48-49 of SAFE report). Aggregate coho include stocks known to not be meeting escapement objectives. Therefore, the Tier and buffer method may not reliably be conservative, and the Conservation Corridor needs to be in place.

The FWC recommends maintaining the current drift gillnet length of 150 fathoms, maintaining one 12-hour fishing period per week from July 16 to July 31 and expanding the restricted fishing through August 15 to allow only one 12-hour fishing period per week.

Please see the attached letter sent by the Fish & Wildlife Commission in December 2023, including six specific points of recommendation.



Fish & Wildlife Commission Chair, Andy Couch