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## Special Meeting

January 29, 2026

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***Pg.* = *Item*:**



Assembly Chambers, DSJ Bldg, 350 E. Dahlia Ave., Palmer, AK 99645
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**DRAFT**

# Environmental Assessment for the Harvest Specifications of the Cook Inlet Salmon Fisheries in the EEZ Off Alaska

**January 2026**

Lead Agency: National Marine Fisheries Service, National Oceanic and Atmospheric Administration

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**Abstract**
This Environmental Assessment (EA) analyzes proposed harvest specifications for salmon fishing in the Cook Inlet Exclusive Economic Zone Area (CI EEZ). The *Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska* (Salmon FMP) governs management of the salmon fisheries in the United States EEZ off Alaska's coast. The North Pacific Fishery Management Council (Council) developed the Salmon FMP under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and National Standard Guidelines. In 2024, amendment 16 to the Salmon FMP and its implementing regulations established management of the Federal salmon fishery in the CI EEZ—including methods for establishing and assessing stock tiers, status determination criteria (SDC) used to evaluate overfishing, and harvest specifications—for five species of Pacific salmon (*Oncorhynchus spp.*). This EA analyzes the impacts to the human environment of adopting the 2026 harvest specifications under a range of proposed alternatives. This EA addresses the requirements of the MSA and National Environmental Policy Act (NEPA) by providing analyses to support informed decision-making regarding the 2026 harvest specifications.

# List of Commonly Used Acronyms and Abbreviations

| Acronym or Abbreviation | Meaning |
|---|---|
| 1954 Act | North Pacific Fisheries Act of 1954 |
| 1992 Stocks Act | North Pacific Anadromous Stocks Act of 1992 |
| AAC | Alaska Administrative Code |
| ABC | acceptable biological catch |
| ACL | annual catch limit |
| ADEC | Alaska Department of Environmental Conservation |
| ADF&G | Alaska Department of Fish and Game |
| ADOR | Alaska Department of Revenue |
| AFSC | Alaska Fisheries Science Center |
| AIS | Automated Information System |
| AKFIN | Alaska Fisheries Information Network |
| AKRO | NMFS Alaska Regional Office |
| AM | accountability measure |
| AMMOP | Alaska Marine Mammal Observer Program |
| ANCSA | Alaska Native Claims Settlement Act |
| ANILCA | Alaska National Interest Lands Conservation Act |
| APA | Administrative Procedure Act |
| AS | Alaska Statute |
| BEG | biological escapement goal |
| BiOp | biological opinion |
| BLS | U.S. Bureau of Labor Statistics |
| BOF | Alaska Board of Fisheries |
| BSAI | Bering Sea and Aleutian Islands |
| CFEC | Commercial Fisheries Entry Commission |
| CFR | Code of Federal Regulations |
| COAR | Commercial Operator Annual Reports |
| Council | North Pacific Fishery Management Council |
| CPUE | catch per unit effort |
| CWT | coded-wire tag |
| DCCED | Department of Commerce, Community, and Economic Development |
| DNR | Alaska Department of Natural Resources |
| DPS | distinct population segment |
| E.O. | Executive Order |
| EA | Environmental Assessment |
| EDPS | Eastern Distinct Population Segment |
| EEZ | Exclusive Economic Zone |
| EFH | essential fish habitat |
| EIS | Environmental Impact Statement |

| Acronym or Abbreviation | Meaning |
|---|---|
| ESA | Endangered Species Act |
| FFP | Federal Fisheries Permit |
| FMA | Fisheries Management Area |
| FMP | fishery management plan |
| FMU | fishery management unit |
| FONSI | Finding of No Significant Impact |
| FR | Federal Register |
| Ft | foot or feet |
| GOA | Gulf of Alaska |
| GSI | genetic stock identification |
| IRFA | initial regulatory flexibility analysis |
| LOA | length overall |
| M | meters |
| MFMT | maximum fishing mortality threshold |
| MSA | Magnuson-Stevens Fishery Conservation and Management Act |
| MSC | Marine Stewardship Council |
| MMPA | Marine Mammal Protection Act |
| MSST | minimum stock size threshold |
| MSY | maximum sustainable yield |
| NEPA | National Environmental Policy Act |
| NMFS | National Marine Fisheries Service |
| NOAA | National Oceanic and Atmospheric Administration |
| NOAA OLE | NOAA Office of Law Enforcement |
| NPFMC | North Pacific Fishery Management Council |
| NS | National Standard |
| OEG | optimal escapement goal |
| OFL | overfishing limit |
| OY | optimum yield |
| PBF | physical or biological feature |
| PBR | potential biological removal |
| PCFA | principal components factor analysis |
| PPI | Producer Price Index |
| RFA | Regulatory Flexibility Act |
| RIR | Regulatory Impact Review |

## List of Commonly Used Acronyms and Abbreviations (Continued)

| Acronym or Abbreviation | Meaning |
|---|---|
| SAFE | Stock Assessment and Fishery Evaluation |
| SBRM | Standardized Bycatch Reporting Methodologies |
| SDC | Status Determination Criteria |
| Secretary | Secretary of Commerce |
| SEG | sustainable escapement goal |
| SFHS | Alaska Sport Fishing Harvest Survey |
| SSC | Scientific and Statistical Committee |
| State | State of Alaska |
| TAC | total allowable catch |
| UCI | Upper Cook Inlet |
| UCIDA/CIFF | United Cook Inlet Drift Association and Cook Inlet Fishermen's Fund |
| U.S. | United States |
| USFWS | United States Fish and Wildlife Service |
| USGS | United States Geological Survey |
| VMP | vessel monitoring plan |
| VMS | vessel monitoring system |
| WDPS | Western Distinct Population Segment |

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## Executive Summary

This EA examines proposed harvest specifications for salmon fishing in the Federal CI EEZ salmon fishery as established in the Salmon FMP[1] under the terms of the MSA and National Standard Guidelines (50 CFR 600.305 – 600.355). The proposed harvest specifications analyzed in this EA includes the following alternatives.

- **Alternative 1 –** *The no action alternative*. Harvest specifications are not established, total allowable catch (TAC) is not set for any salmon species, and salmon fishing would not be permitted in the CI EEZ.
- **Alternative 2 –** *Status quo and the preferred alternative*. Harvest specifications are established following the methods and procedures in the Salmon FMP. To account for uncertainty, TACs are set less than the preseason overfishing limit ($OFL_{PRE}$) and less than or equal to the combined acceptable biological catch (ABC) of the salmon stocks and stock complexes for each salmon species.
- **Alternative 3 –** *The alternative that represents the highest allowable harvest under the Salmon FMP*. Harvest specifications are established with TACs set equal to the $OFL_{PRE}$. This would remove any buffer to account for scientific or management uncertainty such that $OFL_{PRE}$ = ABC = TAC.

This EA analyzes the impacts to the human environment of adopting the 2026 harvest specifications under a range of proposed alternatives. This EA addresses the requirements of NEPA to provide the analytical background for decision-making.

## Proposed Action, Purpose and Need

In accordance with the MSA, National Marine Fisheries Service's (NMFS) proposed action is the adoption of the 2026 harvest specifications for the CI EEZ salmon fishery based on the Council's harvest specification recommendations.

This proposed action would implement the Council's recommended harvest specifications for the federally-managed salmon fishery in the CI EEZ that are consistent with the methods and procedures in the Salmon FMP; provide for the sustained participation of fishing communities, harvesters, and processors; and balance the allowable harvest of target salmon stocks with ecosystem needs. This proposed action is necessary for the continued implementation of the Salmon FMP and for NMFS to manage a viable salmon fishery in the CI EEZ while preventing overfishing.

## Alternatives

This EA considers three alternative harvest specification scenarios. Because salmon of the same species originate from separate stocks, but cannot be visually distinguished in the fishery, TACs may be set at the species level based on the estimated available yield across stocks, unless inseason methods become available (e.g., genetic methods) that would enable the management of TACs at the stock level. Under the terms of the MSA and the Salmon FMP, the TAC must be less than or equal to the ABCs established for each component stock(s) and their estimated

[1] https://www.npfmc.org/wp-content/PDFdocuments/fmp/Salmon/SalmonFMP.pdf

proportional contribution to total catch, and account for allowable de minimis harvest amounts and projected removals from the recreational salmon fishery. The TACs may be reduced from ABCs if warranted on the basis of concerns about the harvest of weak salmon stocks, bycatch considerations, management uncertainty, ecosystem requirements, or social and economic considerations. The criteria used in evaluating the management objectives are the reference points, which are defined in National Standard 1 Guidelines as SDC, MSY, ABC, and ACL for each stock or stock complex and optimum yield (OY) for the fishery, as described in the Salmon FMP and annual CI EEZ SAFE documents (Appendix 1). If a preseason forecast suggests that the spawning escapement target will not be achieved for a given stock, de minimis harvest on the stock may be allowed to reduce the risk of fishery restrictions that impose severe economic consequences to fishing communities without substantive management or conservation benefits. The following alternatives considered in this EA span a range of potential harvest levels from: no fishing, TACs set less than or equal to the combined ABC of the salmon stocks and stock complexes for each salmon species, and fishing at the maximum permissible level allowed under the Salmon FMP. The three alternatives are as follows.

**Alternative 1 –** *The no action alternative*. Harvest specifications are not established, TAC is not set for any salmon species, and salmon fishing would not be permitted in the CI EEZ salmon fishery.

Under Alternative 1, the CI EEZ salmon fishery would be closed if NMFS did not publish the annual harvest specifications for this fishery. Thus, this alternative does not meet the purpose and need for the proposed action. Under this alternative, harvest could still occur within State of Alaska (State) waters.

**Alternative 2 –** *Status quo*[2] *and the preferred alternative.* Harvest specifications are established following the methods and procedures in the Salmon FMP. To account for uncertainty, TACs are set less than the $OFL_{PRE}$ and less than or equal to the combined ABC of the salmon stocks and stock complexes for each salmon species.

The Council and its Scientific and Statistical Committee (SSC) recommend OFLs, ABCs, and TACs for each stock or stock complex based on tier assignment and buffers to account for uncertainty that are described in the Salmon FMP and CI EEZ SAFE report (Appendix 1). NMFS would implement these Federal management measures according to the Salmon FMP and the Federal rulemaking process.

**Alternative 3 –** *The alternative that represents the highest allowable harvest under the Salmon FMP*. Harvest specifications are established with TACs set equal to the $OFL_{PRE}$. This would remove any buffer to account for scientific or management uncertainty such that $OFL_{PRE}$ = ABC = TAC

Under Alternative 3 the TACs would be set to the maximum permissible harvest levels described in the 2025 CI EEZ SAFE report for each stock or stock complex (Appendix 1). Alternative 3 is not the preferred alternative due to conservation concerns for less abundant stocks of salmon.

[2] Status quo refers to the fishery management regime as established by amendment 16 to the Salmon FMP.

**Environmental Assessment**

Section 3 considers impacts to the human environment under a range of alternative harvest strategy scenarios for the CI EEZ salmon fishery. This EA and the documents incorporated by reference provide the best available information on the status of the salmon stocks in Cook Inlet, interactions between the EEZ and State water salmon fisheries, ESA-listed Pacific salmon, marine mammals, non-salmon finfish, and essential fish habitat. Pursuant to section 7 of the ESA, NMFS consulted on the impacts of salmon fishing activities in the EEZ on ESA-listed species and designated critical habitat when implementing amendment 16 (NOAA Fisheries 2024). Under the proposed action, Alternative 2 (*preferred alternative*) would not affect endangered and threatened species or critical habitat in any manner that was not previously considered in the amendment 16 ESA section 7 consultation. The potential impacts from the proposed action to Pacific salmon, other non-salmon finfish, marine mammals, and essential fish habitat are discussed in this section.

The primary effects of each alternative would derive from the harvest limits that are allocated to the directed commercial drift gillnet and the recreational salmon fisheries in the CI EEZ salmon fishery. The environmental effects of these alternatives are summarized in Table 1.

The preferred alternative (Alternative 2) would set TACs below $OFL_{PRE}$ and less than or equal to the combined ABC of the salmon stocks and stock complexes for each salmon species to account for scientific and management uncertainty, which is consistent with the Salmon FMP and the harvest specifications for the 2024 and 2025 CI EEZ salmon seasons. This action is expected to establish annual harvest limits that would be consistent with historical harvest estimates in the CI EEZ. As a result, no significant environmental impacts are anticipated with this alternative.

**Community and Economic Considerations**

Section 4 analyzes the economic considerations of the three alternatives considered in this EA.

A primary impact of all alternatives considered in this EA is on revenue from commercial salmon and charter salmon fisheries. The final Environmental Assessment/Regulatory Impact Review for amendment 16 (A16 EA/RIR) (NMFS 2024a) notes that because the commercial and charter salmon fishing operations are distributed among many communities, the impacts of the alternatives are likely to be broadly shared, but somewhat diffuse among various communities. The social and economic impacts of the alternatives are summarized in Table 1.

Under the preferred alternative (Alternative 2), harvest of CI salmon stocks in the CI EEZ by the Upper Cook Inlet (UCI) drift gillnet fishing fleet would be managed to prevent overfishing less abundant stocks; however, over the long term, annual harvest totals of salmon in the CI EEZ are expected to be fairly consistent with estimated historical harvest levels from this area. Federal harvest limits that account for scientific uncertainty will avoid depleting weak stocks that would ultimately limit harvests and/or result in overfishing/rebuilding plans over the long term that could result in more restrictive management strategies limiting fishing opportunity. Overfishing would be more likely to occur under Alternative 3. Given the extremely small harvest of the recreational salmon fishery in the CI EEZ, combined with the recreational fishery's ability to avoid or release weak stocks, it is unlikely recreational harvests would change significantly under Alternative 2 versus Alternative 3.

**Description of Terms**

Briefly, $OFL_{PRE}$ is the preseason overfishing limit and the basis for establishing preseason ABC. As described in the Salmon FMP, the ABC must be less than or equal to the OFL. The Council's Scientific and Statistical Committee (SSC) may recommend reducing ABC from the OFL to account for scientific uncertainty, including uncertainty associated with the assessment of spawning escapement goals, forecasts, harvests, and other sources of scientific uncertainty. For Tier 1 and 2 stocks, the $OFL_{PRE}$ is based on the preseason total run size forecast and defined as the maximum stock-specific EEZ harvest (number of fish) that could occur while still achieving the spawning escapement target and accounting for estimated non-EEZ (State) harvests for the coming fishing season. For Tier 3 stocks, consistent with the Salmon FMP and recommended by the SSC for the 2025 assessment, the OFL is the largest *cumulative* EEZ harvest (number of fish) across a species generation time while the $OFL_{PRE}$ is the largest *average* harvest from the stock that occurred in the EEZ across a single generation. As an example, for tier 3 sockeye salmon, the OFL is defined by the five consecutive years for which the sum of estimated EEZ harvests is the largest in the timeseries, while the $OFL_{PRE}$ would be the average harvest for those same years. For Tier 3 stocks, the OFL is the postseason basis for assessing overfishing. For Tier 1 and 2 stocks, overfishing is assessed postseason by comparing the actual stock-specific harvest rate in the EEZ ($F_{EEZ}$) with the maximum fishing mortality threshold (MFMT).

**Table 1. Comparison of alternatives and major impacts.**

| | Alternative 1 (no action alternative) | Alternative 2 (Preferred alternative) | Alternative 3 |
|---|---|---|---|
| **Description of Alternative** | The no action alternative. Harvest specifications are not established and TACs are not set. Salmon fishing is closed in CI EEZ. | Establish harvest specifications following the methods and procedures in the Salmon FMP. The TACs are set less than $OFL_{PRE}$ and less than or equal to the combined ABC of the salmon stocks and stock complexes for each salmon species to account for uncertainty. This alternative balances harvest of the most abundant stocks with the need to conserve less abundant stocks. | Establish harvest specifications at the highest allowable level. The TACs are set equal to the preseason overfishing limit ($OFL_{PRE}$) and therefore do not account for scientific or management uncertainty. This EA assumes that fully harvesting the TAC for the most abundant stocks will result in exceeding the TACs for some less abundant stocks. |
| **Comparison of Alternatives --** (Section 2) | | | |
| **Commercial Catch Limits** | No commercial salmon harvests are permitted in CI EEZ. | The commercial catch limits (TACs) account for uncertainty. The $OFL_{PRE}$ for each stock is reduced by a buffer such that the resulting ABC accounts for scientific uncertainty (e.g., uncertainty in forecast estimates); the ABC may also be reduced by a buffer such that the resulting TAC accounts for management uncertainty (e.g., uncertainty due to the mixed-stock nature of the fishery). | The commercial catch limits (TACs) are set at the $OFL_{PRE}$ and do not account for scientific or management uncertainty. Commercial catch limits ($OFL_{PRE}$ = ABC =TACs) for Tier 1-2 stocks represent total potential yield in the EEZ after the achievement of the spawning escapement target and predicted harvests in State fisheries. For Tier 3 stocks, TACs are set at the largest average harvest for a single generation in the historical time series. |
| **Recreational Management Measures** | No recreational salmon harvests are permitted in CI EEZ. | No anticipated changes to the recreational management as outlined in 50 CFR 679.119 | Recreational management measures would be unchanged from alternative 2. |

| **Environmental Impacts --** (Section 3) | | | |
|---|---|---|---|
| **Alaska Salmon Stocks** | Kenai and Kasilof sockeye salmon may exceed spawning escapement targets in some years, which could result in future reductions in productivity. No detrimental effects expected to other salmon stocks. Impacts to salmon stocks would be dependent upon compensatory harvest opportunities provided in non-EEZ fisheries. | No detrimental effects to Alaska salmon stocks expected due to harvest specifications that account for scientific uncertainty. Escapement targets are expected to be achieved at a rate that is similar to recent years. UCI salmon stocks of high abundance (Kenai and Kasilof sockeye salmon) may continue to exceed spawning escapement targets during some years. | Harvest at the $OFL_{PRE}$ level for stocks of high abundance may result in overfishing the less abundant stocks. Escapement targets may not be achieved for indicator stock(s) of Aggregate coho and Aggregate Other sockeye salmon. Aggregate coho salmon in particular may enter an overfished condition. Impacts to Aggregate Chinook salmon are unclear due to a lack of evidence that this stock is harvested in the CI EEZ. No expected detrimental effects to pink or chum salmon stocks. |
| **ESA-listed Pacific Salmon** | No effects are expected as there are no ESA-listed species of Pacific salmon originating from freshwater habitats in Alaska and no evidence that ESA-listed salmon species are harvested in the CI EEZ. | No effects are expected as there are no ESA-listed species of Pacific salmon originating from freshwater habitats in Alaska and no evidence that ESA-listed salmon species are harvested in the CI EEZ. | No effects are expected as there are no ESA-listed species of Pacific salmon originating from freshwater habitats in Alaska and no evidence that ESA-listed salmon species are harvested in the CI EEZ. |
| **Other non-salmon finfish** | No notable effects are expected as incidental bycatch is minimal. | No notable effects are expected as incidental bycatch is minimal and logbook reporting is required for non-salmon species. | No notable effects are expected as incidental bycatch is minimal and logbook reporting is required for non-salmon species. |

| | | | |
|---|---|---|---|
| **Marine Mammals** | Potential positive effects to ESA-listed CI beluga whales and some other marine mammals due to enhanced availability of salmon as prey, especially coho salmon, unless harvest increases correspondingly within State waters. | Status quo levels of prey available in the CI EEZ. No detrimental effects to marine mammals expected. | Potential for adverse effects to ESA-listed beluga whales and some other marine mammals due to reduced availability of salmon as prey, especially coho salmon. |
| **Essential Fish Habitat** | No detrimental effects expected to marine habitat. | No detrimental effects expected. There is a risk of gear loss which may have minor impacts to habitat. | No detrimental effects expected. May increase the risk of gear loss with associated impacts to habitat. |
| **Social and Economic Impacts --** (Section 4) | | | |
| **Commercial and Charter Revenue** | Potentially forgone revenue of up to $3.9 million (2025 CI EEZ ex-vessel drift gillnet value), de-minimis changes in charter revenue | Revenue of approximately $3.9 million (2025 CI EEZ ex-vessel drift gillnet value) or more depending on TACs and market conditions, no expected change in charter revenue | Potentially increased revenue in 2026 with TAC set at $OFL_{PRE}$, depending on market conditions, no expected change in charter revenue. If overfishing were to occur in 2026 and salmon stock rebuilding plans were necessary, then that could decrease potential revenue in future years. |
| **Community Impacts** | Potentially adverse impacts on communities if revenue cannot be made up in State waters | Maintains or potentially increased revenue; therefore, is beneficial to fishery dependent communities with the scale depending on TAC level and market conditions. | |

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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 Kasilof 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 Deshka 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.*

| | Deshka kings | Deshka 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.[i] 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.

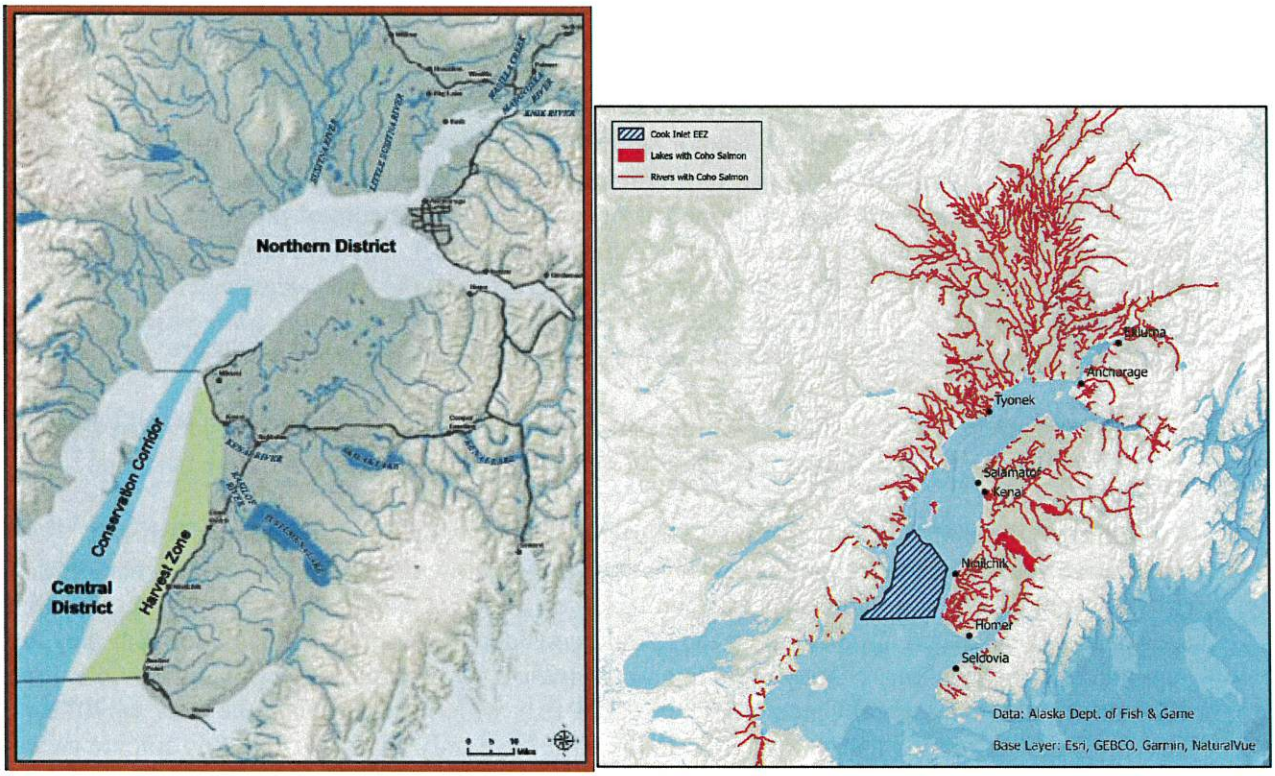


*Figure 1. Left: When commercial fishing is limited to nearshore areas, a passage opens to allow salmon to migrate to the Northern District. Right: EEZ and streams that aggregate coho stocks return to.*

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 data[iii]… 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.

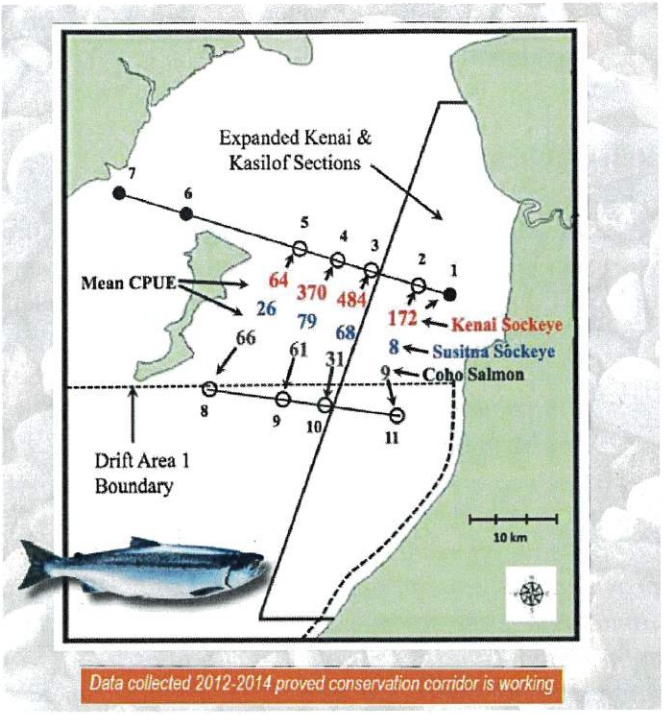


*Figure 2. Results of offshore test fisheries conducted by ADFG.*

**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,

Andrew N. Couch

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

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[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