

Honorable Curt Menard
Mayor, Matanuska-Susitna Borough
350 E. Dahlia
Palmer, AK 99645

May 16, 2008

Dear Mayor Menard,

The Mat-Su Borough Blue Ribbon Sportsmen's Committee finds ourselves greatly disturbed with the manner in which the Board of Fisheries (BOF) and the Department of Fish and Game (ADF&G) is addressing the Stock of Concern status of Susitna Sockeye Salmon. The Committee met following the February Board of Fisheries meeting on Upper Cook Inlet Fin Fish and discovered this sentiment unanimous among our membership. We are writing in hopes of escalating this concern to build support for bringing the Susitna Sockeye Action Plan better into compliance with the Sustainable Salmon Fisheries Policy.

During the course of the BOF meeting, the Board declared Susitna Sockeye a Stock of Concern under the Sustainable Salmon Fisheries Policy (5 AAC 39.222). Pursuant to that designation, the ADF&G proposed what they considered an "Action Plan" to the BOF for consideration. The BOF accepted that document without modification. It is our position that this document fails to meet the criteria set forth in the Sustainable Salmon Fisheries Policy (SSFP) for an Action Plan by a wide margin.

We would like to see the ADF&G and the BOF withdraw this document and generate an SSFP-compliant Action Plan for these stocks and we ask your assistance in advancing our position to the state.

The SSFP is very clear about what to do in the case where the sustainability of a salmon stock is uncertain. The ADF&G has repeatedly documented their "uncertainty" regarding Susitna/Yentna salmon. Quoting from their "Action Plan", "Although sockeye salmon escapements are estimated via a Bendix sonar system, there is *great uncertainty* surrounding their accuracy and precision. . . "the department has *low confidence* in the accuracy of our estimate of the Susitna sockeye salmon harvest".

This uncertainty has been consistent for many years and only this season has the BOF succumbed to pressure and taken steps to address the situation. On its face, this is good news, however the action part of this "Action Plan" is lacking.

The SSFP states clearly, "in the face of uncertainty, salmon stocks, fisheries, artificial propagation, and essential habitats shall be managed conservatively as follows." Excerpting from the SSFP it reads:

(4) in association with the appropriate management plan, the department and the board will, as appropriate, collaborate in the development and periodic review of an action plan for any new or expanding salmon fisheries, or stocks of concern; action plans should contain goals, measurable and implementable objectives and provisions including

- (A) measures required to restore and protect salmon habitat including necessary coordination with other agencies and organizations;
- (B) identification of salmon stock or population rebuilding goals and objectives;
- (C) fishery management actions needed to achieve rebuilding goals and objectives in proportion to each fishery's use of, and hazards posed to, a salmon stock;
- (D) descriptions of new or expanding salmon fisheries, management concern, yield concern, or conservation concern; and;
- (E) performance measures appropriate for monitoring and gauging the effectiveness of the action plan that are derived from the principles and criteria contained in this policy;

It is the position of the Mat-Su Mayor's Blue Ribbon Sportsmen's Committee that the abbreviated 9-page "Action Plan" prepared by the ADF&G and the BOF fails to comply with any of the requirements listed above.

By comparison, the 24-page 2006 Kvichak River Sockeye Salmon Stock Status and Action Plan, as well as, the 21-page Norton Sound Shaktoolik and Unalakleet Subdistrict Chinook Salmon Stock Status and Action Plan contain extensive discussion of goals and objectives along with performance measures that enable the BOF to know whether the concerns regarding these stocks are improving.

To further the insult of what many consider an "Inaction Plan" the BOF under the encouragement of the ADF&G violated the most basic principle of the SSFP by not only failing to proceed cautiously, but by further liberalizing the commercial harvest of Upper Cook Inlet sockeyes.

During the BOF meeting, the ADF&G released statistics collected in the past couple years showing that on certain days the Central District commercial fishery caught as many as 100,000 Northern District-bound sockeyes. The implication of this information is that had the fishery been closed for as little as a few days, the escapement of sockeyes to the Northern District could have been doubled.

Making matters worse, we have received word that ADG&G held closed-door meetings with Cook Inlet Aquaculture regarding the nature of research the department plans to contract for as a result of this alleged Action Plan and rumor is that they plan to discontinue the salt water research that provides this kind of information.

Again, the SSFP calls for public input and we feel the appearance of evasive behavior that denies the public any input in this highly sensitive subject will be detrimental to the ADF&G. The department has not even enlisted input from their regional Advisory Committees on this matter.

It is saddening to report that after attempting to participate in the Board of Fisheries process in good faith the perspective of our committee is that the integrity of both the ADF&G and the BOF appears questionable.

Any recommendations on how to elevate these concerns is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Kluberton", with a long horizontal flourish extending to the right.

Tom Kluberton, Chairman

Cc: John Duffy, MSB Manager

Attachments: SSFP

2008 Susitna Sockeye Action Plan

2007 Kvichak River Sockeye Salmon Stock Status and Action Plan

2003 Norton Sound Shaktoolik and Unalakleet Subdistrict Chinook
Salmon Stock Status and Action Plan