

From: Bruce Knowles [<mailto:bigfish@mtaonline.net>]

Sent: Friday, May 16, 2008 6:11 PM

To: Rep. Craig Johnson; Rep. Bill Stoltze; Rep. Mark Neuman; Rep. Wes Keller; Sen. Charlie Huggins; Sen. Lyda Green

Subject: Mat-Su Borough Blue Ribbon Committee Comments

Rep. Johnson following our phone conversation this afternoon I am sending you the Cook Inlet Preseason Salmon Forecast from the ADFG commercial fishing web site. The Dept is forecasting a total return of 5.6 million sockeye with a harvest total harvest by all user groups of 3.9 million which equates to a 70% harvest rate.

The department has forecasted 453,000 sockeye for the Susitna River Drainage, when you subtracted 70% from the 453,000 that leaves 136,000 sockeyes to return to the Susitna River drainage that needs a minimum of a 180,000 to met both the Yetna River SEG. The harvest would have to be reduced to less than 50% to met the escapement goal.

I am also attaching a copy of the letter that has been sent to the Matanuska-Susitna Borough Mayor, from the Mat-Su Borough Blue Ribbon Sportsmen's Committee. Express our concerns about the actions of the Board of Fisheries and the Department of Fish and Game.

I serve as the chairman of the Susitna River Advisory Committee, co chair of the Mat-Su Borough Blue Ribbon Sportsmen's Committee and several committees and groups. I am available to provide information concerning the Northern District Stocks and the mismanagement that has taken place and is still currently taking place. I have some very sound and logical management action that could be taken to move all stocks into the Northern District and in two life cycles approximately 10 years would increase the runs and the harvest of commercial fishermen. When first over escapement occur on the Kenai River sockeye salmon return was going to die and each year after, dire results were forecasted. The only thing that has happen commercial fishermen have had some of their largest harvest on record year after. While the Northern District stocks decline.

Bruce Knowles
907-495-4965
232-5873

ALASKA DEPARTMENT OF FISH AND GAME
DIVISION OF COMMERCIAL FISHERIES
NEWS RELEASE



Denby S. Lloyd, Commissioner
John Hilsinger, Director



Contact:
Mark Willette, Research Project Leader
Jeff Fox & Pat Shields, Area Management Biologists
Phone: (907) 262-9368
Fax: (907) 262-4709

Soldotna ADF&G
43961 Kalifornsky Beach Rd.
Suite B
Soldotna, AK 99669
Date Issued: 12/17/2007

2008 UPPER COOK INLET SOCKEYE SALMON FORECAST

A run of 5.6 million sockeye salmon is forecasted to return to UCI in 2008 with a harvest by all user groups of 3.9 million sockeye salmon. The forecasted harvest in 2008 is about 200,000 fish below the 20-year average harvest by all user groups. The sockeye salmon run forecast for the Kenai River of 3.1 million is 16% less than the 20-year average run of 3.7 million. Age-1.3 sockeye salmon typically comprise about 65% of the run to the Kenai River. A sibling model based upon the return of age-1.2 sockeye salmon in 2007 was used to predict a return of 2.6 million age-1.3 sockeye salmon to the Kenai River in 2008, while the fry model predicted a return of 2.5 million age-1.3 sockeye salmon. Age-2.3 sockeye salmon typically comprise about 20% of the run to the Kenai River. A sibling model based upon the return of age-2.2 sockeye salmon in 2007 was used to forecast the return (286,000) of age-2.3 sockeye salmon to the Kenai River in 2008. The return of age-2.2 sockeye salmon in 2007 was 58% less than the 20-year average return for this age class. The predominant age classes in the 2008 run should be age 1.3 (85%) and age 2.3 (9%).

The sockeye salmon run forecast for the Kasilof River of 1.3 million is 33% greater than the 20-year average run of 968,000 fish. Age-1.3 sockeye salmon typically comprise about 35% of the run to the Kasilof River. A sibling model based upon the return of age-1.2 sockeye salmon in 2007 was used to forecast the return (376,000) of age-1.3 sockeye salmon in 2008. The return of age-1.2 sockeye salmon last year was 57% greater than the 20-year average return for this age class. Age-1.2 sockeye salmon typically comprise about 30% of the run to the Kasilof River. A sibling model based upon an above average return of age-1.1 sockeye salmon in 2007 was used to forecast the return of age-1.2 sockeye salmon to Kasilof River. The sibling model predicted a return of 484,000 age-1.2 sockeye salmon. However, we are less confident in this forecast, because a smolt model predicted a return of only 252,000 age-1.2 sockeye salmon. Age-1.2 sockeye salmon migrated as smolts from the Kasilof River in 2006, when their estimated abundance was only 2.6 million, about one-half of the 20-year average. The predominant age classes in the 2008 run should be age 1.2 (38%) and age 1.3 (29%).

The sockeye salmon run forecast for the Susitna River of 344,000 is 24% less than the 20-year average run of 453,000. Age-1.2 and -1.3 sockeye salmon typically comprise 72% of the run to the Susitna River. A spawner-recruit model was used to forecast the return (80,000) of age-1.2 sockeye salmon to the Susitna River. The spawner abundance for this age class was about 37% less than the 20-year average spawner abundance. A sibling model based upon the return of age-1.2 sockeye salmon in 2007 was used to forecast the return (170,000) of age-1.3 sockeye salmon to the Susitna River in 2008. The return of age-1.2 sockeye salmon in 2007 was 44% less than the 20-year average. The predominant age classes in the 2008 run should be age 1.3 (49%) and age 1.2 (23%).

The sockeye salmon run forecast for Fish Creek of 53,000 is 67% less than the 20-year average run of 159,000. Age-1.2 and -1.3 sockeye salmon typically comprise 79% of the run to Fish Creek. Sibling models based upon the abundances of age-1.1 and -1.2 sockeye salmon in 2007 were used to forecast the returns of age-1.2 (36,000) and -1.3 (10,000) sockeye salmon in 2008. The abundances of age-1.1 and -1.2 sockeye salmon returning to Fish Creek in 2007 were 74% less than the 20-year average. The predominant age classes in the 2008 run should be age 1.2 (67%) and age 1.3 (19%).

The sockeye salmon run forecast for Crescent River of 100,000 is 7% less than the 20-year average run of 108,000. Sibling models based upon returns of age-1.2 and -2.2 sockeye salmon in 2007 were used to forecast returns of age-1.3 (48,000) and -2.3 (28,000) sockeye salmon to the Crescent River in 2008. The predominant age classes in the 2008 run should be age 1.3 (48%) and age 2.3 (28%).

Forecast runs to individual freshwater systems are as follows:

System	Run	Goal Range
Crescent River	100,000	30,000–70,000
Fish Creek	53,000	20,000–70,000
Kasilof River	1,286,000	150,000–250,000
Kenai River	3,064,000	750,000–950,000
Susitna River	344,000	90,000–160,000 ^a
Minor Systems	727,000	N/A

^a The inriver goal listed for Susitna River sockeye salmon is the escapement goal range for Yentna River sockeye salmon. The sonar estimate of sockeye salmon escapement into the Yentna River is typically multiplied by 1.95 to expand the estimate to the entire Susitna River watershed.

For more information contact Mark Willette, Jeff Fox, or Pat Shields at the Soldotna ADF&G office at (907) 262-9368.

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 6-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,

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