



United Cook Inlet Drift Association

43961 K-Beach Road, Suite E • Soldotna, Alaska 99669 • (907) 260-9436 • fax (907) 260-9438
ucida@acsalaska.net

January 23, 2009

Dear Legislative Task Force Members,

The purpose of this letter is to respond to a letter to the task force sent through Curt Menard, Mayor of the Matanuska-Susitna Borough dated December 5, 2008.

It is unfortunate that Mayor Menard was misinformed by his advisory panel and as a result he has misinformed the task force as well.

Here are some of the issues that should be clarified or corrected:

Menard states:

"It is apparent to our committee members that the Board of Fisheries (BOF) and the Alaska Department of Fish and Game (ADF&G) primarily manages the Upper Cook Inlet commercial salmon fishery to attain "Maximum Sustained Yields"(MSY) from the Kenai and Kasilof River sockeye salmon."

This statement is incorrect. Since 1999 the BOF passed the Kenai River Sockeye Salmon Management Plan which changed the MSY sockeye salmon goal to an Optimum Goal. The MSY goal was 500,000 to 800,000 fish while the optimum goal is 500,000 to 1 million sockeye salmon. Therefore, the BOF recognized that MSY goals needed to be altered to meet some of the social needs in UCI. The higher sockeye salmon goals would result in reduced returns to the Kenai River on average.

Menard states:

"Today demographics have changed drastically...certain past management practices are no longer acceptable to the rapidly growing portion of the population."

We believe the state must change from the present practice of pursuing maximum sustained yield for a limited audience, when it deprives others (the great majority) of their constitutional right to an equitable share of that resource. Residents of northern Cook Inlet cannot and will not accept management that primarily emphasizes maximum sustained harvests of Kenai and Kasilof sockeye salmon at the almost total exclusion of other salmon species and stocks.

These statements are very unfortunate and misleading. The residents of the Anchorage and Matanuska-Susitna Basin are the major harvesters of Kenai and Kasilof sockeye

salmon. Combined harvest levels in the personal use and sport fishery approach 400,000 to 500,000 fish and most of this harvest is from residents outside the Kenai Peninsula area.

The sockeye salmon sport harvest in the Susitna River is only about 10,000 fish from a total return of 400,000 to 900,000 entering the system. Additionally, Mat-Su fishermen harvest about 3,000 pink salmon from a total return of 10,000,000 to 20,000,000 annually. Putting more sockeye into the Susitna River above the goals does not benefit any users if the excess escapement results in a reduced sockeye production in Kenai and Kasilof River that is presently used by these same residents.

The claim that ADF&G manages to the almost total exclusion of other salmon species and stocks is not proven with any objective data. Review of emergency orders will show that each year ADF&G writes numerous orders restricting the commercial fisheries to move northern bound stocks into the Susitna and other northern drainages.

Finally, if one reviews the escapements for Kenai and Kasilof sockeye salmon relative to goals one will see they are consistently exceeded which refutes the idea that these stocks are managed to the detriment of other stocks.

Menard states:

“Therefore, we believe...manage Upper Cook Inlet salmon for “Optimum Sustained Human Benefits”

This is a very perplexing statement. The State Constitution notes that resources are to be managed for the maximum benefit of the people. No definition of optimum is provided except for three management objectives. These are:

- A. Management of Susitna and Fish Creek is to meet existing in-season escapement goals. This is presently being done. Escapement goals have been met and exceeded based on new data from the weir counts and mark/recapture estimates.
- B. The development of scientifically based escapement goals for in-season commercial management of coho, pink, and chum salmon is also requested. ADF&G has been working on this technical issue and has not done so, not for political reasons but because of biological and technical limitations. For example, in-season management requires counts to be available in a timely manner. The inability to count salmon in the lower Susitna River makes in-season counting impossible and therefore not useful for in-season management of the fisheries. However, other indicators of abundance – the drift gill net harvest and offshore test boat index – can be used to assess overall run strength coming into Cook Inlet
- C. The final request is for genetic identification program that will provide in-season information on all stocks. Again, there are several significant technical issues that limit any in-season use of these types of data. Even if successful, the cost of such a program is very high relative to other priorities for salmon management. Within the Susitna River drainage there are major threats to production including, but not limited to, northern pike infestations, stream blockages and habitat destruction.

Lastly, Menard states:

We recommend that the Task Force consider the following approaches to meeting conservation goals... again thank you for investigating the sub-standard returns of salmon stocks to Northern Cook Inlet...

The idea that returns to the Northern Cook Inlet are sub-standard is not true for pink, chum, coho, and Chinook salmon. Data on these stocks presented by ADF&G to the BOF has shown that there is no conservation concern for these stocks and that they are healthy. Exploitation rates by the commercial fishery on these stocks are very low and most of the fish are currently reaching their natal streams.

While Susitna sockeye salmon were made a “stock of yield concern” by the BOF, this designation is not a “conservation concern.” Yields have decreased in the commercial fishery because of lower production and reduced fishing time. However, lower production is primarily due to issues associated with pike predation, blockages to migration and in-lake production issues. Again, escapement goals have been reached in three of the last three years using the weir counting method widely recognized as the most accurate salmon counting method.

One recommendation that requires further discussion is the concept of a conservation corridor in UCI. First, ADF&G has the authority via emergency order to restrict commercial fishing time by time and area. Therefore, they can use their flexibility to create a conservation corridor at any time if needed.

However, if a conservation corridor as purposed was put in place as proposed, the ability to harvest all salmon stocks in Cook Inlet would be seriously reduced, and the quality of the salmon harvest would decrease. This would cost the citizens of the State millions of dollars for no useful purpose. There are times and areas that the drift gill net fleet must fish in the open waters of UCI for effective management and product quality. To deny this demonstrates a complete lack of understanding of correct fishery management principles as applied to UCI fisheries management.

In summary, it is our opinion that the BOF and ADF&G have listened to the citizens of the State of Alaska, including those from the Northern areas, and have made a series of management plans and management actions that are consistent with the maximum benefit to the citizens of this State, including the Anchorage and Matanuska-Susitna areas. In contrast the letter from Mayor Menard including the recommendations would cause direct harm to these same citizens, including his residents of Anchorage and the Mat-Su.

Sincerely,

Original Signed Document

Roland Maw
UCIDA Executive Director
ams