

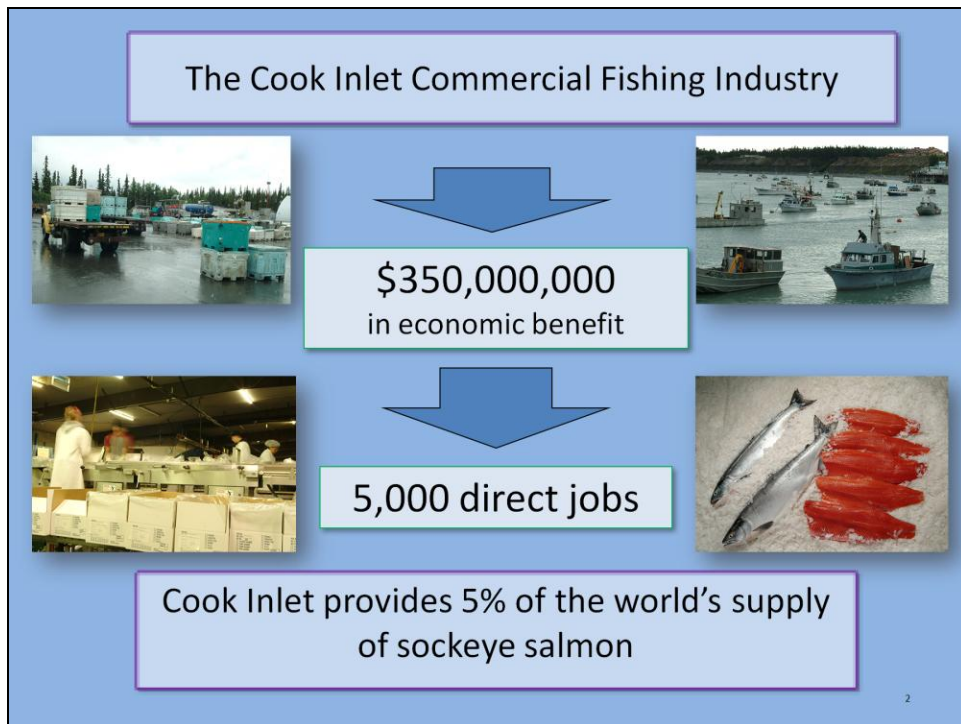


A presentation by the United Cook Inlet Drift Association to the Alaska State Senate Resources Committee, March 26, 2014.

United Cook Inlet Drift Association

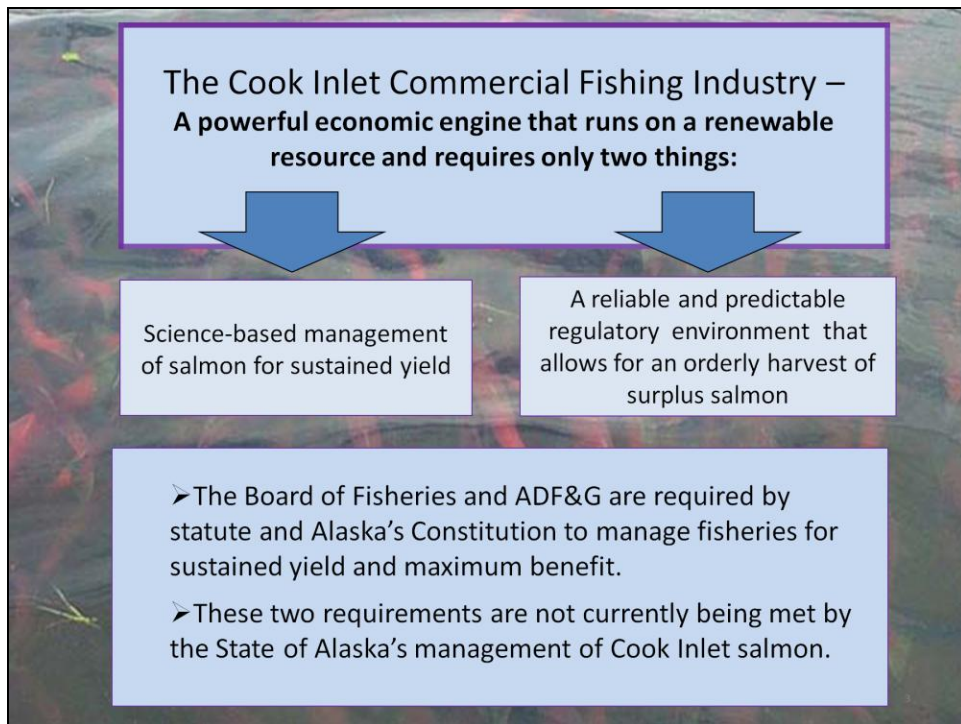
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In 2013, Northern Economics conservatively valued the Cook Inlet commercial fishing industries' annual contribution to the regional economy at \$350,000,000, with 5,000 direct jobs.

Cook Inlet provides 5% of the world's supply of sockeye salmon, and, when managed properly, Cook Inlet is the fourth largest salmon fishery in the state.



This viable and important industry has been here since 1882 and can continue indefinitely. It requires science-based management of salmon for sustained yield and a reliable and predictable regulatory environment.

The Board of Fisheries and ADF&G are required by statute and Alaska's Constitution to manage fisheries for sustained yield and maximum benefit.

These two requirements are not currently being met by the State of Alaska's management of Cook Inlet salmon.

The Board Process is Broken

- Complexity



- Allocative agendas, disguised as conservation, prevail over science

At the recent Upper Cook Inlet meeting, the Board of Fisheries made decisions that compromised ADF&G's ability to manage the fisheries and stay within escapement goals.

New scientific data was available to inform the Board's decision-making process. Decisions were made contrary to scientific information. The efforts by the Board to address the proposals for the fishery were politically motivated, without a scientific or factual basis, or both.

The Board process was influenced by groups pushing allocative agendas under the guise of conservation.

The Board Process is Broken

Board of Fisheries Upper Cook Inlet Finfish Meeting - 2014

- 236 proposals were presented for consideration and vote,
- The day before the meeting began, Board members were presented with 477 separate "Public Comment" documents.
- ADF&G provided 3,000 pages of reports.
- During the meeting, an additional 288 "Record Comment" documents were submitted to the Board



**Over 5,000 pages of material presented to a non-professional Board
in a week...**

The current Board of Fisheries process is broken. Board members were buried under an avalanche of paper dumped on them in the days prior to, and during, the two-week meeting. Much of the information was technical. Without a thorough understanding of the interrelationships between the different fisheries, gear types, run timing, historical patterns and emerging scientific data, the Board is simply unable to understand the consequences of their decisions. As a result we end up with management plans that cannot achieve the intended result.

The Board Process is Broken

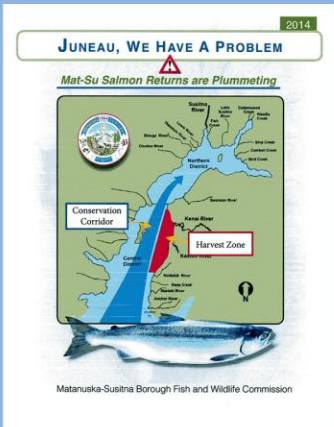
Some of the information presented to the BOF is intentionally misleading.

Exhibit A:

Mat-Su Borough Fish and Wildlife Commission

“Juneau, We Have a Problem”

This pseudo-scientific document became the basis for the BOF’s new Cook Inlet Drift Fishery Management Plan.



The Board Process is Broken

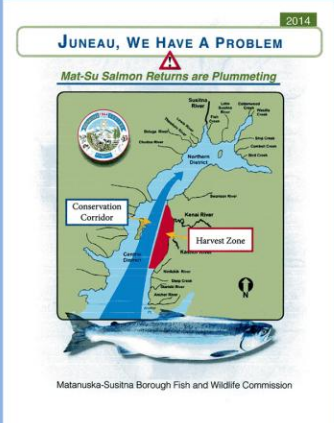
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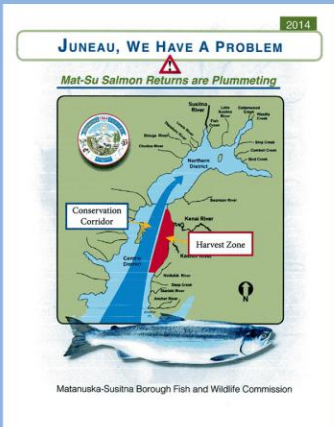
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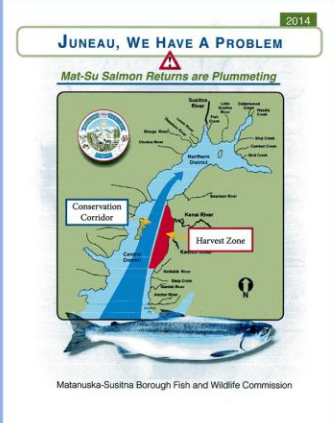
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2014

JUNEAU, WE HAVE A PROBLEM

Mat-Su Salmon Returns are Plummeting

Conservation Corridor

Harvest Zone

Matanuska-Susitna Borough Fish and Wildlife Commission

The Board Process is Broken

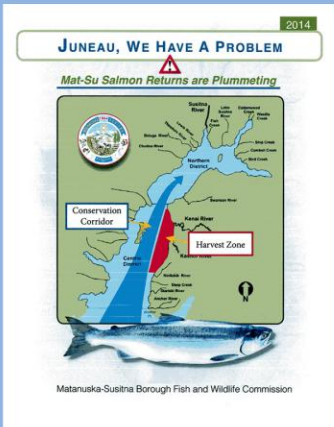
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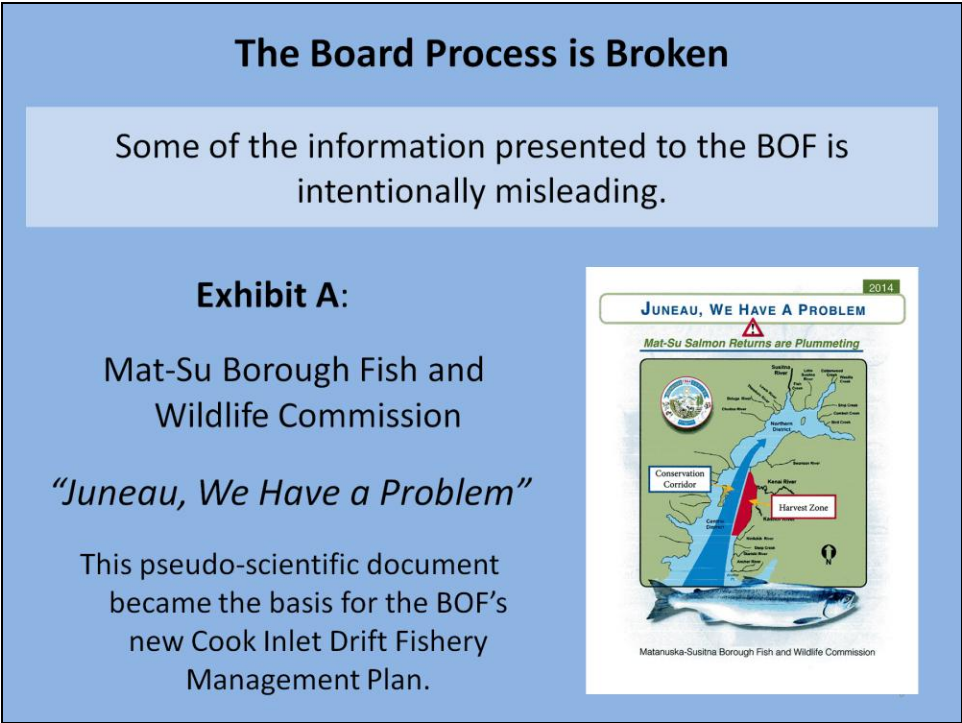
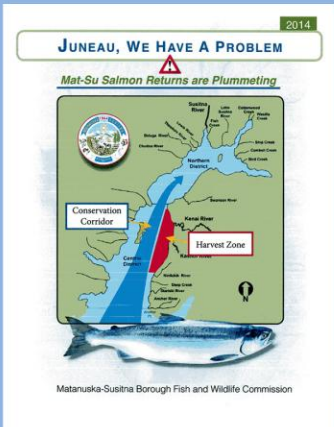
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At the recent UCI meeting, the Board of Fisheries also made decisions that compromised ADF&G's ability to manage the fisheries and stay within escapement goals.

Nowhere else in Alaska will you find a borough-sponsored sport-fishing advocacy group writing commercial fishery management plans. This begs the question “why don’t the plans work?”

The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"

Misinformation

*"Salmon...returning to Northern Cook Inlet streams are almost
universally in decline."* (pg.3)

*"Northern District salmon fail to get through the Central District
commercial fisheries gauntlet in sufficient numbers"* (pg.3)

These are not true statements.

**The causes for salmon declines in the northern district can be
found in the northern district. Mat-Su Borough representatives
are attempting to cover up their in-river problems with
misdirection and allocation.**

The Mat-Su's document is full of exaggerations, half-truths, omissions and insinuations.

The conservation issues that exist for northern Cook Inlet salmon stocks were not caused by saltwater fisheries and cannot be fixed by restricting saltwater fisheries.

The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"
Misinformation – Sockeye Salmon

Not an interception issue:

Chelatna Lake

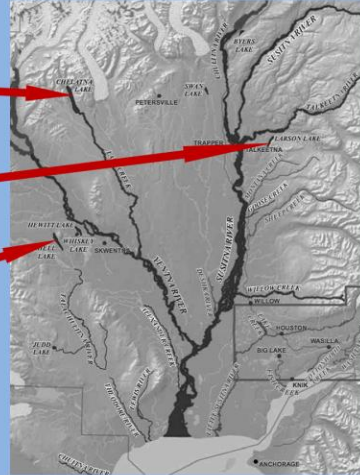
Sockeye escapement goal met or exceeded 4 out of 5 past years.

Larson Lake

Sockeye escapement goal met in 4 out of 5 past years.

Shell Lake

Sockeye escapement 70,000 in 2006; now less than 25 fish due to pike and disease.



If declines in northern salmon stocks were due to so-called interception then effects would be seen across the stocks. But some stocks are doing fine, some stocks are not, because the problems are in the rivers, streams and lakes. For example, Chelatna Lake has made its sockeye escapement goal in four of the past five years and exceeded the goal in two of those years. Larson Lake met its sockeye escapement goals in four of the five past years. In 2006 Shell Lake had nearly 70,000 sockeye spawners, in 2013 it had less than 25 spawners due to invasive pike predation and disease.

The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"
Misinformation – King Salmon

Not an interception issue:

Susitna River

89,463 kings counted here in 2013

(Susitna-Watana Hydroelectric Project, Salmon Escapement Study, February 2014).

Alexander Creek

Lost almost entire king run and
26,000 annual angler days to
invasive northern pike.

Commissioner Campbell, Feb. 18, 2014:

*"I don't believe the department is
assuming commercial harvest pressure as
the causal factor in Chinook declines for
any of the runs we have statewide."*



The Mat-Su document says on page three that "King salmon numbers have dropped to record lows." Not True. This past summer almost 90,000 kings were counted in the mainstem of the Susitna River, upstream of some major king tributaries like the Yentna and Skwentna Rivers. Some stocks are doing fine, some stocks are not.

Alexander Creek, a tributary of the Susitna, has lost almost all of its king run, and 26,000 angler days per year, to invasive northern pike. Several of the other streams with designated king stocks-of-concern are road-accessible and intensely exploited by sport fishing.

Six of the seven stocks-of-concern in the northern district are king runs that have almost no harvest by commercial fisheries.

ADF&G Commissioner Campbell corroborated this after a Mat-Su representative's presentation to another legislative committee last month (Feb. 18) when she said "I don't believe the department is assuming commercial harvest pressure as the causal factor in Chinook declines for any of the runs we have statewide."

The MSB Fish and Wildlife Commission

"Juneau, We Have a Problem"

Misinformation – Coho Salmon

Not an interception issue:

Susitna River

130,000 cohos counted here in 2013.
Adding in the Yentna component
brings the Susitna total to over
240,000 coho.

(Susitna-Watana Hydroelectric Project, Salmon Escapement
Study, February 2014).

Mat-Su's publication does not mention
the Susitna numbers, only the low
escapements in the intensely
exploited and polluted Little
Susitna River and the intensely
exploited and habitat-impaired
Jim Creek.



Nearly a quarter million coho went up the Susitna River last summer. Mat-Su's publication doesn't mention those numbers, only the problem they have with the returns to the Little Susitna River and Jim Creek. They don't mention the pollution, habitat damage and poaching problems they have in those systems. They also don't mention that the Little Susitna used to be enhanced with hatchery coho. When the enhancement program was suspended in 1996, escapement goals were not changed and ADF&G's intent was to see if the natural stocks could handle the sport fishing pressure. ADF&G either needs to adjust escapement goals based on current production or reinstitute a hatchery stocking program.

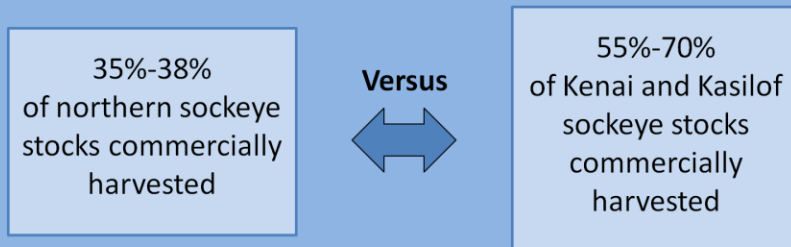
The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"

Misinformation

"One of the issues we feel very strongly about is the current management in Cook Inlet salmon does allow overfishing on northern bound salmon..." (Larry Engel to the Joint Senate and House Fish and Game Finance Subcommittee, February 18, 2014, "Laws for the Sea", 2/24/14.)

This is not a true statement.

Northern Sockeye - Not Overfished



A Mat-Su representative told a legislative Committee last month that ADF&G allows "overfishing" on northern-bound stocks of salmon... This is not a true statement.

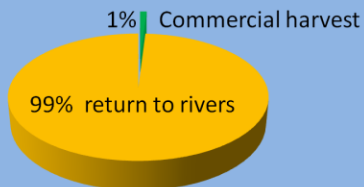
It's not true of sockeye stocks; ADF&G estimates that 35% to 38% of northern sockeye stocks are commercially harvested. The commercial harvest rate on the Kenai and Kasilof stocks range from 55% to 70%.

Normal harvest rates to achieve maximum sustained yield range between 40% and 70%.

The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"
Overfishing?

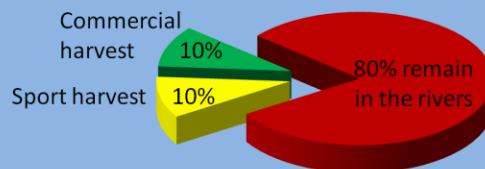
Kings - Not Overfished

99% of northern kings get back to the rivers.



Cohos - Not Overfished

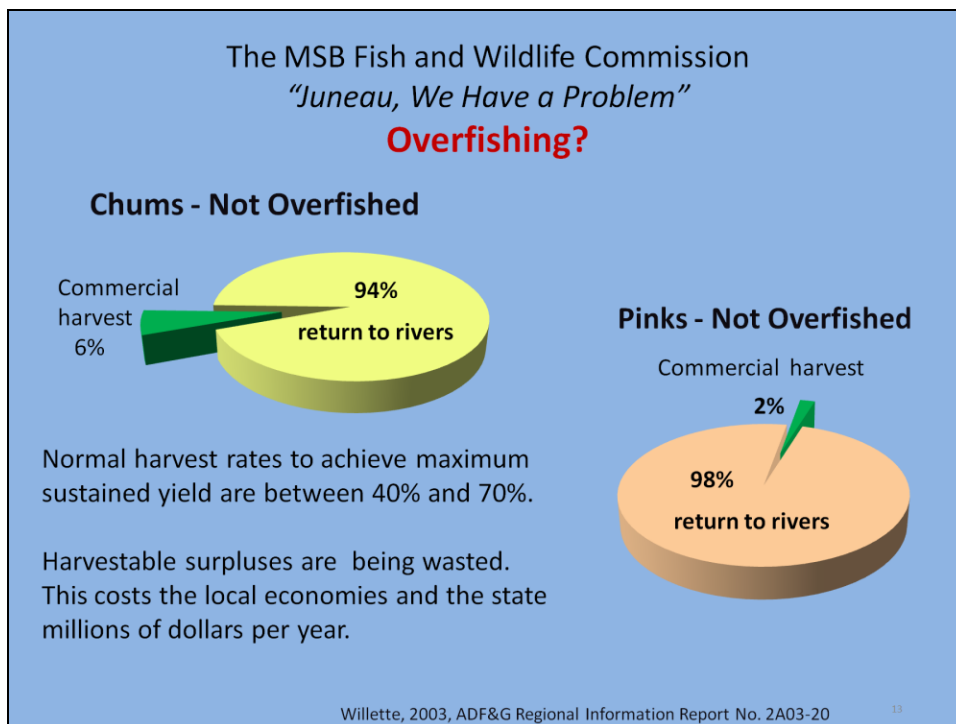
90% of cohos get back to the rivers



Willette, 2003, ADF&G Regional Information Report No. 2A03-20

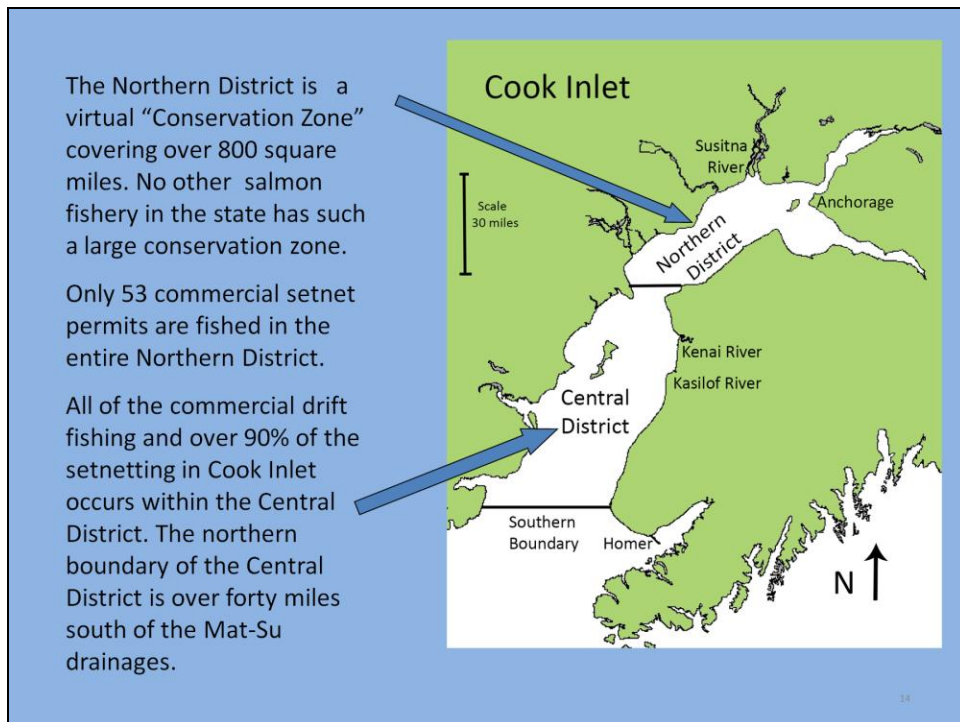
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Neither king stocks nor coho stocks are overfished. About one percent of northern king stocks are commercially harvested and only 10% of UCI coho stocks are commercially caught. These are the facts, with no spin.



Only six percent of UCI chum stocks are commercially harvested and only 2% of UCI pink stocks are commercially harvested.

The Cook Inlet commercial fishery is under-fishing, not overfishing, salmon stocks. This does not meet the mandate for sustained yield.



Commercial harvest rates are low for northern stocks in part due to geography. The Northern District is a virtual “Conservation Zone” covering over 800 square miles. No other salmon fishery in the state has such a large conservation zone.

Only 53 commercial setnet permits are fished in the entire Northern District.

All of the commercial drift fishing and over 90% of the setnetting in Cook Inlet occurs within the Central District. The northern boundary of the Central District is over forty miles south of the Mat-Su drainages.

The MSB Fish and Wildlife Commission
"Juneau, We Have a Problem"

Misinformation

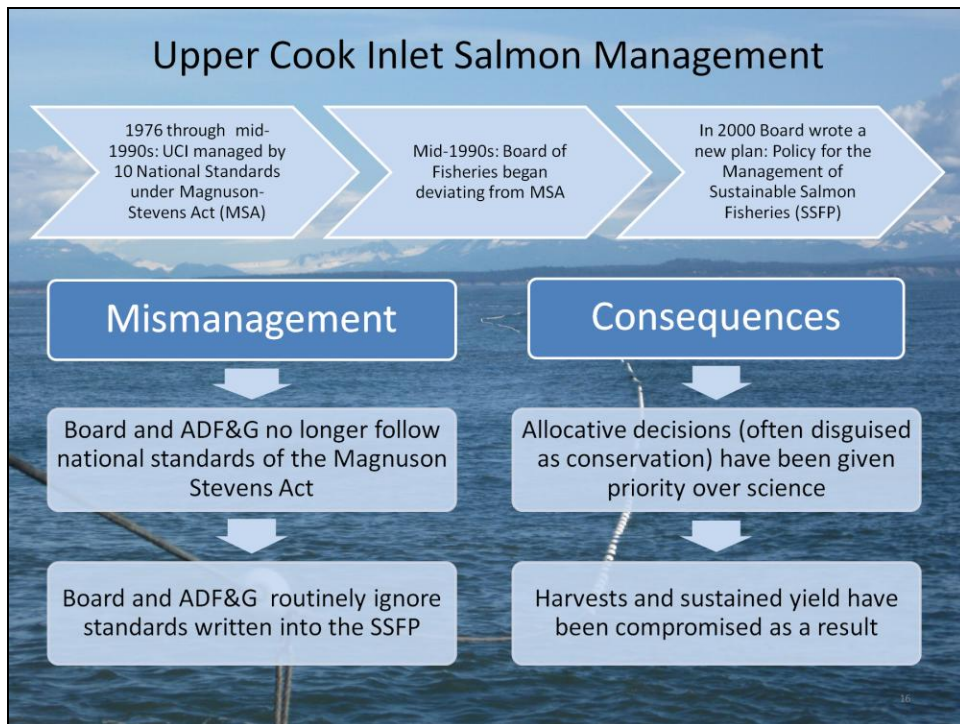
"The single most important human factor impacting Mat-Su region salmon returns is interception in intensive commercial gill net fisheries for mixed species and stocks in the marine waters of Upper Cook Inlet." (pg.27)

This is not a true statement.

ADF&G biologists estimate that salmon production in the Mat-Su Basin has been reduced by 50% as a result of the unmitigated spread of invasive northern pike that were illegally stocked by resident sport fishermen.



Salmon stocks in UCI are not adapted to northern pike predation. ADF&G has found invasive pike in 135 lakes, streams and rivers in the Mat-Su. The department has a pike control program in only one of these systems.

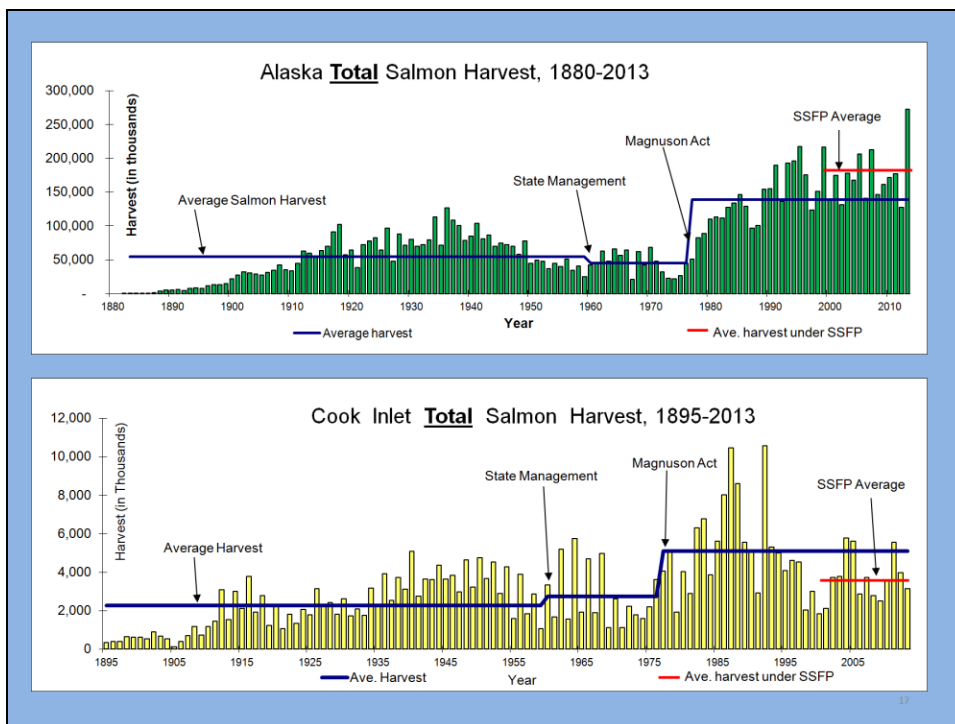


Because management standards are no longer followed and because of the misinformation presented to the Board, there has been a gradual erosion of best management practices.

Salmon are an anadromous specie and as such fall under federal regulation. After the passage of the Magnuson-Stevens Act in 1976, the State of Alaska agreed, in a Memorandum of Understanding with the National Marine Fisheries Service, that it would manage fisheries in Cook Inlet in a manner consistent with the MSA.

In the mid to late 1990s the Board of Fisheries began deviating from MSA. In 2000 the Board wrote a new plan: Policy for the Management of Sustainable Salmon Fisheries (SSFP).

The Board and ADF&G routinely ignore the standards written into the SSFP.



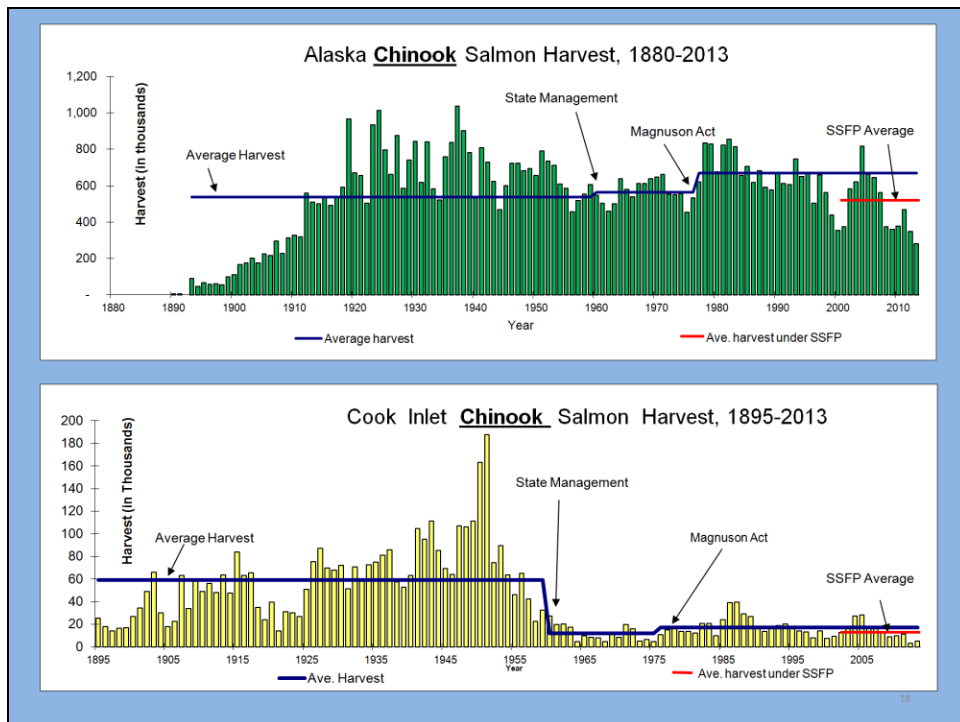
After statehood the Alaskan salmon returns puttered along until 1976 when the Magnuson-Stevens Act (MSA) became federal law. The MSA had immediate and dramatic results on salmon resources across the state. Within a few years the overall commercial harvest of salmon on a statewide basis increased over 200%.

In 2000, the State adopted the Sustainable Salmon Fisheries Policy (SSFP). In the graphs, beginning in 2000, the blue line continues across at the MSA average, while the red line shows the actual average harvest from 2000 through 2013.

In the upper graph you can see a modest benefit gained in the statewide salmon harvest numbers (although those gains are due to hatchery production of pinks and chums). In Cook Inlet, under SSFP, the average harvests of all species of salmon have declined.

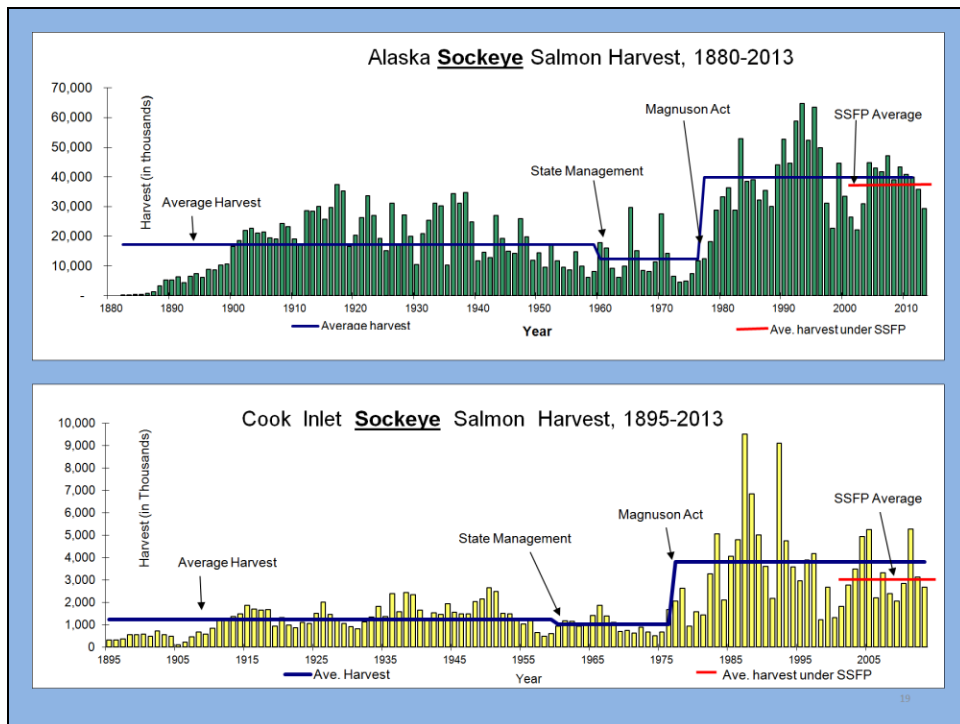
On the Cook Inlet chart, the difference between the average harvests under Magnuson and the SSFP, the red and blue lines, on the right end of the chart is a rough measure of unharvested surplus salmon.

NOTE – the scale on the left axis changes between the statewide and Cook Inlet graphs.



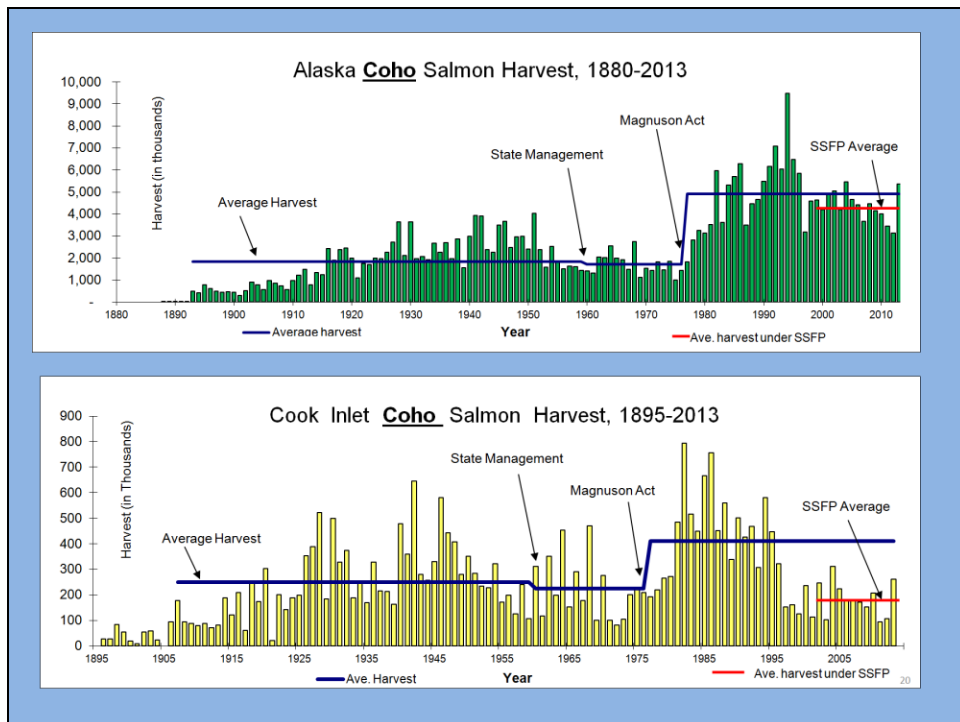
The low Cook Inlet harvest rates of king salmon reflect how they have largely been allocated away from the commercial fisheries in Cook Inlet after the stocks started to recover in the mid-1980s.

ADF&G Commissioner Campbell (on Feb.18 2014) said “I don’t believe the department is assuming commercial harvest pressure as the causal factor in Chinook declines for any of the runs we have statewide.”

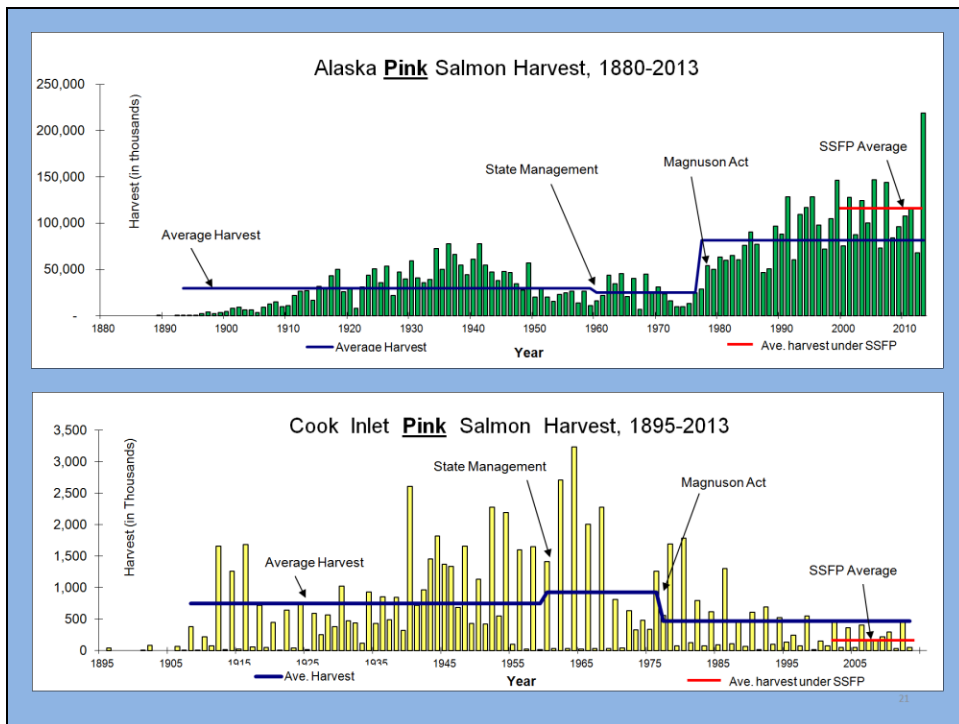


Sockeye salmon harvests across the state benefitted from the MSA but Cook Inlet sockeye harvests have not maintained that level under the SSFP.

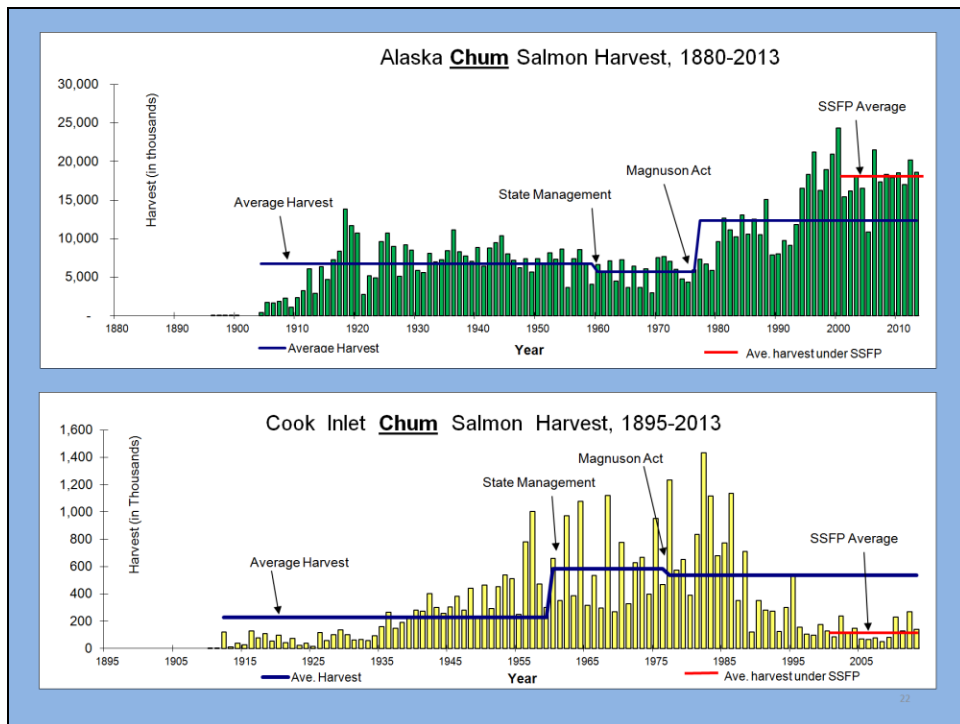
In the mid to late 1990s when the Board of Fisheries and ADF&G stopped complying with their agreement with the National Marine Fisheries Service to manage fisheries in Cook Inlet in a manner consistent with the MSA, the Cook Inlet harvest decreased by an average of about 700,000 sockeye per year. This lost harvest had an ex-vessel value of between 4 and 10 million dollars per year.



Commercial harvests of coho salmon in Cook inlet have been greatly reduced, even though 90% of Cook Inlet coho get back to the rivers. Sport fishing harvests only about another 10%, leaving a large, harvestable surplus which you can see reflected in the decreased harvest in the Cook Inlet chart.



Commercial harvests of pink salmon in Cook inlet have been tremendously reduced. The most recent ADF&G study indicated that the commercial fisheries harvest only 2% of available stocks, leaving an immense harvestable surplus. On even years, this surplus is in the tens of millions of pounds.

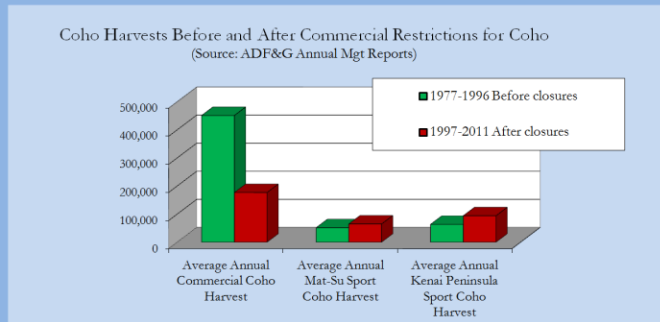


The commercial harvests of chum salmon in Cook inlet have also been tremendously reduced. Commercial fisheries harvest only 6% of available stocks, leaving an immense harvestable surplus. Hundreds of thousands of fish and millions of pounds of product go unharvested. This deprives the region and the state of Alaska of the economic benefit of this surplus natural resource.

What Changed?

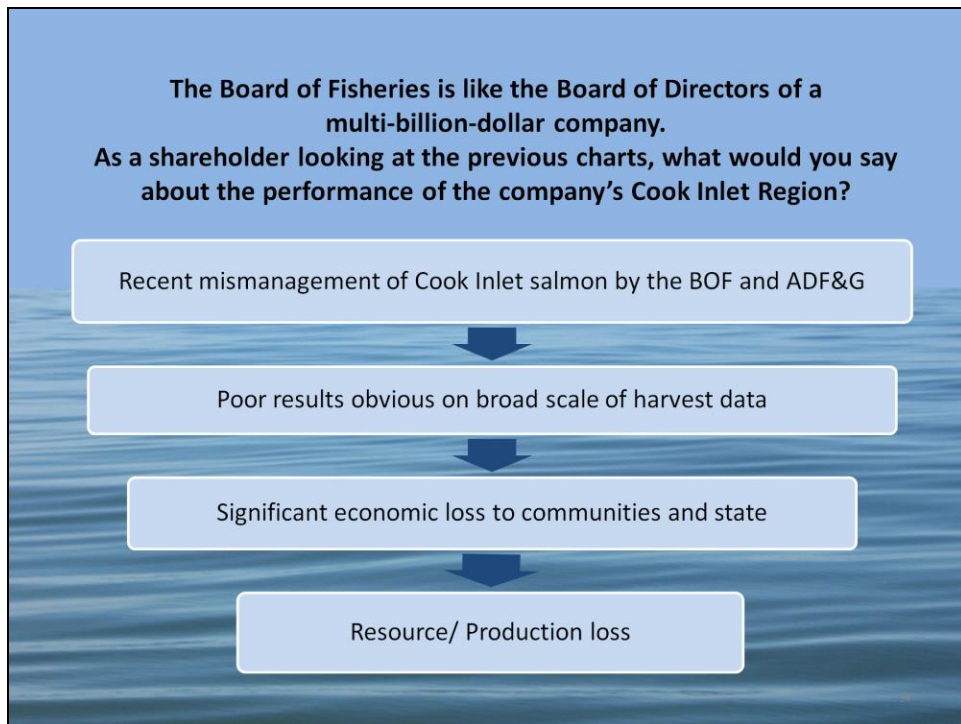
The Board restricted Cook Inlet commercial fisheries in late July and August assuming that the increased sport harvest of coho would be significant.

- The benefit to the in-river users was less than 5% of the coho harvest lost to commercial fisheries.
- Opportunity for commercial harvest of pink and chum salmon was virtually eliminated and commercial harvest of surplus sockeye salmon was reduced.



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This is a clear example of how the Board makes management decisions based on perception rather than factual information.



What we see is mismanagement of Cook Inlet salmon by the BOF and ADF&G that has led to unnecessary reductions in harvest, resulting in significant economic losses and damage to the production capacity of the salmon resource in Cook Inlet.

The Mat-Su Borough Fish and Wildlife Commission is out of step with the economic and scientific realities of sustainable salmon management.

- Utilizing science-based management practices for sustained yield will benefit all user groups.
- Habitat problems and other threats to salmon production cannot be ignored.
- Personal Use fisheries are out of control and approaching maximum capacity.
- All user groups are important to our economy. Commercial fishing in Cook Inlet is a vital and essential part of the economic health of south-central Alaska. If the Board of Fish was doing its job, we would not have millions of dollars of harvestable surpluses of salmon going to waste.



Fish Creek Personal Use fishery, Mat-Su Borough

The Mat-Su Borough Fish and Wildlife Commission is out of step with the economic and scientific realities of sustainable salmon management.

All user groups of the salmon resource are important to Alaska's economy. The 2008 economic crash and recession demonstrated that we shouldn't put all of our eggs in the tourism basket. This is one reason why our constitution and federal fishing policies are designed to support all user groups.

As you have heard from the City of Kenai, Personal Use fisheries are out of control and they are approaching maximum capacity.


If the Board of Fish was doing its job, we would not have millions of dollars of harvestable surpluses of salmon going to waste.



*Juneau, the Mat-Su has a Problem...
but it is not commercial fishing.*

- Most causes of salmon declines have been identified and need to be addressed: pike, beaver dams, culverts, habitat damage, poaching.
- State funding should be spent on rehabilitation projects and enhancement programs.
- State funding should not be wasted on unnecessary research or politically motivated projects. Research funds should only be spent on projects that are scientifically defensible.
- The legislature should expect to get a return on their investment in the Mat-Su in the form of objective improvements in salmon habitat and increased salmon production.

The commercial fishing industry has been funding rehabilitation projects in the Mat-Su for many years through the Cook Inlet Aquaculture Association. We are familiar with the problems and frustrated with the lack of local response.



Solutions

- Manage fisheries consistent with the Magnuson-Stevens Act and the Ten National Standards.
- The Board of Fisheries needs to be turned into a professional group. Board members actually need to be qualified and not geographic/political appointees.
- Proposals should pass a scientific and technical review panel before being presented to the board.
- Board generated proposals must have a public review and a public comment period of at least 48 hours.

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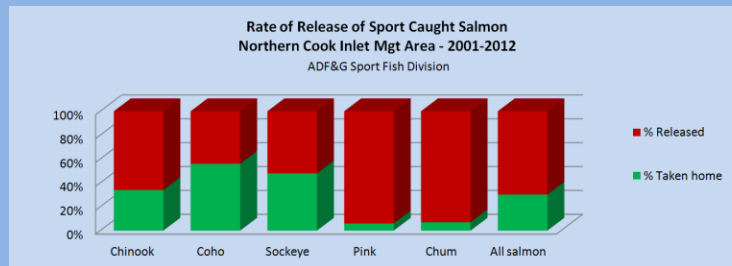
The Legislature can respond with administrative changes to the Board of Fisheries. Re-establishing science-based management of Cook Inlet salmon within proven, existing standards can provide more fish for all user groups.

Addendum

In recent years Mat-Su representatives have been utilizing the “fish for Alaskan’s freezers” argument in their efforts to allocate fish away from commercial fisheries.

This is more misinformation.

Sport fishers in ADF&G’s Northern Cook Inlet Management Area release an average of 70% of their sport catch. If Valley sport fishermen really weren’t getting enough salmon, wouldn’t they keep more of their catch?



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