

RC 14

October, 9, 2013

RE: Upper Cook Inlet Stocks of Concern

Chairman Johnstone and Board of Fisheries Members,

It has come to the attention of the Matanuska Susitna Fish and Wildlife Commission that the Alaska Department of Fish and Game (ADF&G) may have overlooked some important Upper Cook Inlet salmon stocks that according to Department data may present concern related to yield and / or management in the Department's submission of RC8.

Please also reference the Commission's previous submission of PC15.

Northern Cook Inlet King Salmon for Stock of Concern Consideration.

In reviewing RC8 the Department has made a recommendation to add Sheep Creek king salmon and elevate Goose Creek king salmon as stocks of management concern. The commission could concur with this recommendation, however, it should be noted that ADF&G has provided no discussion on which any additional Northern Cook king salmon stock(s) may present yield concern(s).

Rather than attempting to separately list and discuss ALL Northern King salmon stocks which may present yield concern it may be more appropriate to consider ALL Northern king salmon as a group for inclusion in a stock of yield concern. Please see the included ADF&G harvest data for Northern king salmon and note the following: in 2008 the combined Northern king salmon harvest by all identified user groups was the lowest in 25 years dating back through 1984. The total harvest dropped again to an even lower level in 2009. The total harvest dropped further in 2010. In 2011 ADF&G data shows an even lower total harvest of Northern king salmon. This represents 4 consecutive years in a row of harvests that clearly demonstrates a yield concern as identified in the Sustainable Salmon Fisheries Policy (SSFP).

Complete harvest data is not yet available for the 2012 and 2013 seasons, however, it should be noted that in 2012 ADF&G started the season with preseason emergency order restrictions attempting to reduce wild Northern king salmon (Susitna River drainage plus Knik Arm) harvests by approximately 75 percent in both the commercial and sport fisheries. In 2012 these restrictions were followed by additional emergency orders that further closed all Northern wild king salmon fisheries inseason. In 2012 even after the restrictions and closures only 4 of 17 Northern king salmon stocks with established escapement goals attained minimum spawning escapement goals. Under such regulation restrictions, followed by inseason closures, followed by failure to attain even escapement goal minimums in 13 out of 17 streams, would the Department suggest that anything near a normal harvest of Northern king salmon occurred in 2012?

In 2013 the preseason king salmon restrictions were even more severe, as evidenced by this statement taken directly from ADF&G emergency order 2--KS--2--09--13:

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It is anticipated that the reduction in the annual limit combined with additional restrictions contained in other emergency orders will reduce harvest by as much as 80 percent across the Susitna drainage and 75 percent in the Little Susitna River, providing the greatest potential for achieving escapement goals during 2013 and provide fishing opportunity throughout the season. Below average runs over recent years, a below average outlook for 2013, and uncertainty over how quickly returns may recover justify starting the 2013 season with these restrictions.

Please note: ADF&G restrictions in 2013 prohibited all sport king salmon harvest for the entire season in 13 of the 17 streams for which the Department has established escapement goals, thereby reducing legal yield from each of these sport fisheries to zero as defined by the SSFP. These restrictions paid off in that the Department attained king salmon escapement goal minimum levels in 11 of these streams during the 2013 season, and late in the season there was a lifting of some restrictions placed on the Doshka River, however, any reasonable Department spokesperson should in no way suggest that a normal king salmon harvest occurred from any wild Northern king salmon stock in 2013.

In light of the above demonstrations of decreased yield, the Commission requests that the Board, Department, and public work together to see that Northern Cook Inlet king salmon stock(s) receive full discussion and consideration for designation as stock(s) of yield concern at the 2014 Upper Cook Inlet Board of Fisheries Meeting.

Little Susitna River Coho Salmon -- Qualifications as Stock of Concern:

In RC8 it is good to see ADF&G include a discussion of Jim Creek coho salmon as a stock the Department considered for designation as a stock of concern based on the fact that this stock missed the established escapement goal 3 years in a row. The Department concludes, however, that since this stock made escapement in 2013 ADF&G would not recommend it for stock of concern. By SSFP definition chronic inability means continuing or anticipated inability to meet escapement goal thresholds over a four or five year period, the approximate generation time of most salmon species. For that reason it is clear to see why the Department may choose not to recommend Jim Creek coho salmon for stock of concern designation. What is not clear, is why ADF&G makes no mention of Little Susitna River coho salmon, a stock for which ADF&G failed to attain the escapement goal minimum from 2009 - 2012 (4 consecutive years) despite specific management measures.

The lack of mention to Little Susitna River coho salmon stock status is especially troubling considering the SSFP calls for stock status reports from ADF&G that provide (ii) identification of **ANY** salmon stock, or populations within stocks, that present concern related to yield, management, or conservation. It should be noted that in RC8 ADF&G mentions the 3 weir-measured escapement components of the already designated Susitna Sockeye Stock of Yield concern met escapement goals in 4 out of 5 years (Chelatna Lake), 2 out of 5 years (Judd Lake), and 4 out of 5 years (Stephan Lake). Even so, the Department recommends maintaining this stock designation as a stock of yield concern. ADF&G based this recommendation for Susitna sockeye salmon

on (1) five escapements (out of 15) below the minimum goal and (2) harvests in the Central and Northern districts from 2008 - 2013 generally less than the long-term averages. If this is sufficient for recommending continuation of a current stock of concern status, why is there no discussion of Little Susitna River coho salmon, a stock which would seem to meet or exceed the same criteria?

In addition to the four consecutive years mentioned earlier, where ADF&G failed to attain the Little Susitna River coho salmon escapement goal, you will find enclosed ADF&G data that may demonstrate, coho harvest by the management plan designated primary user group generally below average from 2009 through 2011. Note in 2012 (by ADF&G emergency orders) the Little Susitna River sport coho salmon fishery was closed to bait fishing starting August 6 (the regulatory date on which bait fishing normally opens) and then totally closed to all coho salmon fishing on August 10. In addition during 2012 the Little Susitna River coho salmon minimum escapement threshold was missed by 3,230 fish. In light of these facts it would appear highly likely the harvest from this sport fishery was below average once again in 2012.

After 4 years of depressed inriver returns of Little Susitna River coho salmon both guided and unguided effort and coho salmon harvests likely fell below normal levels once again during the 2013 season (these numbers could be considered by checking 2013 charter logbook reports and Little Susitna River sport fishery exit survey data in comparison to past years' data). Finally, while the Department measured escapement was slightly less than the coho salmon escapement goal range midpoint, even if all coho salmon in excess of the goal minimum had been harvested by the sport fishery, this still may not have been enough harvest to achieve the previous average harvest level.

In light of facts and uncertainties brought to light in this discussion of Little Susitna River coho salmon, the Commission would once again request that the Board, Department, and public work together to see that Little Susitna River coho salmon receive a full discussion and consideration for designation as a stock of management concern and / or stock of yield concern.

For the Matanuska -Susitna Borough Fish and Wildlife Commission,

Andrew N. Couch

Andrew N. Couch, Commission Member

Table 20. Estimated harvests of Chinook salmon originating from the Northern Cook Inlet Management

Year	Commercial ^{ab}			Recreational ^b				Total
	NCI ^c	Kustatan	Total	Knik Arm Drainages	Eastside Susitna	Westside Susitna	West Cook Inlet	
1977	565	207	772	207	1,056	2,938	473	4,674
1978	666	221	887	140	886	2,039	478	3,543
1979	1,714	159	1,873	800	1,298	5,768	98	7,964
1980	993	174	1,167	646	1,370	6,148	34	8,198
1981	725	43	768	1,466	2,202	4,742	192	8,602
1982	2,716	391	3,107	1,666	2,063	8,573	147	12,449
1983	933	163	1,096	1,255	2,852	9,568	1,185	14,860
1984	1,004	214	1,218	2,057	4,428	12,106	1,833	20,424
1985	1,890	211	2,101	1,889	4,342	13,644	2,029	21,904
1986	15,488	308	15,796	1,524	8,569	13,402	2,378	25,873
1987	12,701	176	12,877	2,476	8,603	13,350	1,477	25,906
1988	12,836	123	12,959	2,916	9,139	15,970	1,695	29,720
1989	12,731	1,144	13,875	4,341	9,783	19,343	2,325	35,792
1990	9,582	1,084	10,666	2,022	9,423	17,425	2,097	30,967
1991	6,859	925	7,784	2,277	9,083	21,836	762	33,958
1992	4,554	964	5,518	3,969	21,307	18,737	1,213	45,226
1993	3,277	424	3,701	3,602	22,688	21,142	1,955	49,387
1994	3,185	449	3,634	4,303	14,970	10,248	1,583	31,104
1995	4,130	198	4,328	1,707	7,872	6,265	693	16,537
1996	1,958	145	2,103	1,579	11,023	5,879	1,358	19,839
1997	1,133	113	1,246	2,938	10,989	7,799	894	22,620
1998	2,547	83	2,630	2,031	10,472	9,716	693	22,912
1999	2,812	776	3,588	2,724	16,875	12,131	1,073	32,803
2000	2,307	759	3,066	2,824	11,774	17,341	1,163	33,102
2001	1,811	712	2,523	2,255	13,504	13,914	722	30,395
2002	1,895	439	2,334	3,195	10,695	11,357	1,227	26,474
2003	1,670	445	2,115	2,562	9,499	15,035	1,124	28,220
2004	2,058	430	2,488	2,556	8,498	15,694	795	27,543
2005	3,373	87	3,460	3,692	8,453	15,945	592	28,682
2006	4,261	244	4,505	3,813	7,339	16,454	1,038	28,644
2007	3,822	37	3,859	4,326	8,337	11,370	1,380	25,413
2008	3,983	198	4,181	2,843	5,834	6,805	437	15,919
2009	1,630	107	1,737	2,152	3,462	4,713	829	11,156
2010	1,750	52	1,802	1,076	2,274	6,306	854	10,510
2011	2,299	77	2,376	1,012	2,710	5,914	76	9,712
2012	1,050	58	1,108					

Data not available

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^a Fox and Shields 2005.

^b Mills 1979-1994; Howe et al. 1995, 1996, 2001a-d, Walker et al 2003, Jennings et al. *In prep* a and b.

^c Northern District total.

data continued on back

Table 34. Harvest and effort for Little Susitna River coho salmon as estimated by SWHS, 1977-2011.

Year	Harvest			Released	Annual Effort Angler days ^c
	Hatchery ^a	ery	Total ^b		
1977		3,415	3,415		11,063
1978		4,865	4,865		12,127
1979		3,382	3,382		21,301
1980		6,302	6,302		22,420
1981		5,940	5,940		26,162
1982		7,116	7,116		24,020
1983		2,835	2,835		35,477
1984		14,253	14,253		48,517
1985		7,764	7,764		37,498
1986	109	5,930	6,039		45,776
1987	3,407	9,596	13,003		35,659
1988	9,638	9,371	19,009		49,731
1989	10,597	3,550	14,129		54,708
1990	2,242	5,255	7,497	4,906	40,159
1991	7,699	8,751	16,450	4,692	50,838
1992	3,406	16,627	20,033	7,960	49,304
1993	7,703	19,907	27,610	10,589	42,249
1994	6,165	11,500	17,665	4,576	45,149
1995	2,991	11,460	14,451	5,042	41,119
1996	3,418	13,335	16,753	5,445	24,575
1997	0	7,756	7,756	2,242	27,883
1998	0	14,469	14,469	4,558	22,108
1999	0	8,864	8,864	3,036	30,437
2000	0	20,357	20,357	11,160	39,556
2001	0	17,071	17,071	7,565	33,521
2002	0	19,278	19,278	11,304	40,346
2003		13,672	13,672	7,977	31,993
2004	0	15,307	15,307	9,674	33,819
2005	0	10,203	10,203	3,244	27,490
2006	0	12,399	12,399	8,159	28,547
2007	0	11,089	11,089	3,806	23,233
2008	0	13,498	13,498	5,120	31,989
2009	0	8,346	8,346	2,937	28,151
2010	0	10,662	10,662	2,149	24,846
Mean	2,391	10,415	12,102	6,007	33,582
Prior 5 yr average		11,199	11,199	4,434	27,353
2011	0	2,452	2,452	1,383	12,779

^c Participation directed at coho salmon represents only a portion of the annual effort.

^a Bartlett and Conrad 1988, Bartlett and Vincent-Lang 1989, Bartlett and Sonnichsen 1990, Bartlett and Bingham 1991

^b Mills 1977-1994, Howe et al. 1995-2000.