

# MATANUSKA-SUSITNA BOROUGH Fish & Wildlife Commission

350 E Dahlia Ave., Palmer, Alaska 99645

## CHAIRPERSON

Andy Couch

## VICE CHAIR

Peter Probasco

## MSB STAFF

Maggie Brown



## BOARD MEMBERS

Tim Hale

Michael Bowles

Marty Van Diest

Gabe Kitter

Bill Gamble

Kendra Zamzow

*Ex officio:* Jim Sykes

## Regular Meeting

February 13, 2025

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Cold Water Land Designation
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**Physical Location of Meeting:** Room 203 DSJ Bldg, 350 E. Dahlia Ave., Palmer

**Remote Participation:** See attached agenda on p. 1

**Planning and Land Use Department - Planning Division**

<http://www.matsugov.us> • [planning@matsugov.us](mailto:planning@matsugov.us)

**MATANUSKA-SUSITNA BOROUGH  
MSB Fish and Wildlife Commission  
AGENDA**

Edna Devries, Mayor

Andy Couch – Chair  
Peter Probasco – Vice Chair  
Gabriel Kitter  
Tim Hale  
Bill Gamble  
Kendra Zamzow  
Michael Bowles  
Marty Van Diest  
Jim Sykes – Ex officio member

Maggie Brown and Rebecca Skjothaug – Staff



Michael Brown, Borough Manager

PLANNING & LAND USE DEPARTMENT  
Alex Strawn, Planning & Land Use Director  
Jason Ortiz, Planning & Land Use Deputy  
Director  
Vacant, Development Services Manager  
Fred Wagner, Platting Officer

Conference Room 203  
Dorothy Swanda Jones Building  
350 E. Dahlia Avenue, Palmer

**February 13, 2025  
REGULAR MEETING  
4:00 p.m.**

Ways to participate in MSB Fish and Wildlife Commission meetings:

IN-PERSON: Conference Room 203, DSJ Building

REMOTE PARTICIPATION VIA MICROSOFT TEAMS:

Join on your computer:

[Join the meeting now](#)

Meeting ID: 213 715 044 561

Passcode: mJ26N5BL

Or call in (audio only):

1-907-290-7880

Phone Conference ID: 123 236 754#

- I. CALL TO ORDER
- II. ROLL CALL – DETERMINATION OF QUORUM
- III. LAND ACKNOWLEDGEMENT

*"We acknowledge that we are meeting on traditional lands of the Dena'ina and Ahtna Dene people, and we are grateful for their continued stewardship of the land, fish, and wildlife throughout time immemorial."*

- IV. PLEDGE OF ALLEGIANCE
- V. APPROVAL OF AGENDA

VI. APPROVAL OF MINUTES

A. January 9, 2025

VII. AUDIENCE PARTICIPATION (*three minutes per person*)

VIII. STAFF/AGENCY REPORTS & PRESENTATIONS

A. Staff Report/ New Appointees to MSB FWC

B. Chair's Report

C. Elections

i. Chair

ii. Vice Chair

IX. UNFINISHED BUSINESS

A. Doshka Cold Water/Land Designation

B. Borough Waterbody Setback Report

C. Report on Board of Game

D. FWC Game Special Meeting

E. Report on CAPSIS

F. Report from workgroup on comments to NOAA

X. NEW BUSINESS

A. Presentation on ACWA

B. Participation at Statewide Board of Fisheries meeting March 11 – 16 Egan Convention Center, Anchorage -- Supplemental issues

C. Participation at BOG Statewide Regulations March 21-28 Anchorage

XI. MEMBER COMMENTS

XII. NEXT MEETING DATE: March 13, 2025, 4:00-6:00 PM

XIII. ADJOURNMENT

**People needing reasonable accommodation in order to participate at a MSB Fish and Wildlife Commission Meeting should contact the borough ADA Coordinator at 861-8404 at least one week in advance of the meeting.**

**MATANUSKA-SUSITNA BOROUGH**  
**MSB Fish and Wildlife Commission**  
Regular Meeting: January 9, 2025  
DSJ Building, Room 203/TEAMS  
Minutes

I. CALL TO ORDER

Chair Andy Couch called the meeting to order at 4:00pm

II. ROLL CALL – DETERMINATION OF QUORUM

Present:

Andy Couch  
Gabe Kitter  
Howard Delo  
Larry Engel  
Kendra Zamzow  
Jim Sykes  
Bill Gamble

Absent:

Tim Hale  
Peter Probasco

III. LAND ACKNOWLEDGEMENT

AC read the land acknowledgment:

*"We acknowledge that we are meeting on traditional lands of the Dena'ina and Ahtna Dene people, and we are grateful for their continued stewardship of the land, fish, and wildlife throughout time immemorial."*

IV. PLEDGE OF ALLEGIANCE

APPROVAL OF AGENDA

**LE moved to amend the agenda to have the BOG discussion moved to the beginning of the agenda after Chair's Comments; seconded by JS**  
**No objection, motion passed unanimously.**

V. APPROVAL OF MINUTES

**JS moved to approve the November 14 minutes LE seconded**  
**No objection, motion passed unanimously.**

**GK moved to approve the December 12 minutes LE seconded**  
**No objection, motion passed unanimously.**

VI. AUDIENCE PARTICIPATION

Neil DeWitt – Member of the public  
Chennery Fife – Trout Unlimited  
Chris Brockman – Area game biologist  
Garrett Van Diest – Area game biologist  
Representative Kevin McCabe  
Mike Camfield – Public Works manages the fish passage program  
Micheal Bowles – Prospective FWC  
Rebecca Skjohaug  
Lacie Olivieri

VII. STAFF/AGENCY REPORTS & PRESENTATIONS

- A. Staff Report – Maggie Brown
- B. Chair’s Report – Andy Couch
  - i. BG CAPSIS update
  - ii. Workgroup PP, GK, BG, - AC leaving group

VIII. UNFINISHED BUSINESS

- A. Board of Game Central/Southwest Region Regulations Discussion

**JS moved that Howard represents the FWC at the BOG Central & Southwest Region Meeting; seconded by BG**

**LE moved to amend the motion that AC and GK help represent the FWC at the BOG; seconded JS**

**No objection, motion passed unanimously.**

**KZ moved to consider the BOG comments; seconded by GK**

**KZ moved to amend Proposal 64, adding “The commission has supported the concept by not harvesting cows accompanied by calves” to the proposal; seconded by JS**

**HD amended to add, “The commission has supported the concept by not harvesting cows accompanied by calves in selected areas”; not accepted by KZ.**

**KZ moved to amend Proposal 64, adding “We recognize that the Sutton and Chickaloon community councils object to the harvest of cow accompanied by**

calves.” to the end of the proposal; seconded by JS

Howard Delo discussed Proposal 75 -- which would allow aerial management of wolf, brown bear, and black bear by the Alaska Department of Fish and Game, specifically in Game Management Unit (GMU) 16B, in order to more closely meet moose population and harvest objectives. He also discussed Proposal 73 which sought to change Dall sheep harvest in GMU 14A drawing permit hunts from only full curl rams being legal for harvest to any ram being legal for harvest (this proposal currently had no comments from the commission).

After Howard's discussion, there were no further amendments to the Commission's draft comments.

The question was called on the motion to approve the Commission comments for the Board of Game as amended. The motion passed without objection.

Mayor DeVries arrived 5:08 PM

Chris Brockman and Garrett Van Diest left at 5:10PM

- B. KZ presented on Waterbody Setback draft changes to MSB Code
- C. Mike Campfield gave a MSB Fish Passage Program Presentation

**LE moved to support the resolution of the MSB FWC in support of the Wasilla Creek Tributary at Bonnie Drive Fish Passage Culverts Replacement Project; seconded by JS**

**No objection, motion passed unanimously.**

**LE moved to extend the meeting to 6:15pm; seconded by HD**

**No objection, motion passed unanimously.**

**LE moved to send a thank you letter and request from NOAA for additional seasonal reports or updates; seconded by HD.**

**No objection, motion passed unanimously.**

IX. NEW BUSINESS

- A. Updates on New Appointees to MSB FWC

Representative McAbe left 6:13PM

**Motion to extend the meeting to 6:15pm; seconded by JS  
KZ objected, motion did not pass.**

X. NEXT MEETING DATE: February 13, 2025, 4-6pm Room 203

XI. ADJOURNMENT

**LE moved to adjourn; seconded by KZ.  
No objection, motion passed unanimously.  
*Meeting adjourned at 6:15 PM.***

DRAFT

**MATANUSKA-SUSITNA BOROUGH  
FISH & WILDLIFE COMMISSION RESOLUTION SERIAL NO. FWC 22-03**

A RESOLUTION OF THE MATANUSKA-SUSITNA BOROUGH FISH AND WILDLIFE COMMISSION RECOMMENDING MATANUSKA-SUSITNA BOROUGH ASSEMBLY DIRECT ADMINISTRATION TO CLASSIFY KEY BOROUGH-OWNED PARCELS ON THE SHORE OF DESHKA RIVER AS WATERSHED LANDS TO PROTECT SALMON POPULATIONS.

WHEREAS, the Matanuska-Susitna Borough (MSB) Fish and Wildlife Commission (FWC) has reviewed the outcomes of a recent study on the temperature of water entering the Deshka River from adjacent groundwater seeps; and

WHEREAS, this new information shows that certain parcels supporting the cold water inputs to the Deshka River are essential for maintaining healthy salmon runs on the river; and

WHEREAS, the FWC believes it is important that the MSB takes every available action to safeguard healthy salmon runs in local water bodies; and

WHEREAS, economic studies in our region in 2007 and 2017 show the significant positive economic impact returning salmon have on the economy of the MSB, that included \$56 million in direct spending benefits to the MSB in 2017 alone, and there are additional economic benefits from healthy wildlife and fish populations, both of which require adequate and quality habitat locally; and

WHEREAS, the MSB can classify these parcels as watershed lands in recognition of the water quality function they provide that



protects salmon habitat.

NOW, THEREFORE, BE IT RESOLVED, that the FWC recommends the Matanuska-Susitna Borough Assembly direct Borough Administration to bring forward legislation classifying key Borough-owned parcels on the shore of the Deshka River as "Watershed" Lands

ADOPTED by the Matanuska-Susitna Borough Fish and Wildlife Commission this 19<sup>th</sup> day of May, 2022.

  
Mike Wood, Chair

ATTEST:

  
TED EISCHEID, Staff

(SEAL)

## **Matanuska-Susitna Borough Fish and Wildlife Commission Comments (MSBFWC) on Proposals for the Board of Game (BOG) Central and Southwest Regional Meeting held in January 2025, in Wasilla**

### **General Overview of proposals presented**

#### **Bear Proposals**

There doesn't appear to be any shortage of bears, either brown or black, around the region. Several of the proposals dealing with bears are asking for increased seasons, increased bag limits, or other factors which would potentially increase harvest opportunities. The commission supports the proposals which increase harvest opportunity, or which give Fish and Game increased management ability to help regulate bear populations.

Something many people don't understand is that once man starts dabbling in an ecosystem by managing a few populations of animals, say prey species like moose and caribou, without managing other populations like predatory species such as wolves and bears, an imbalance in animal numbers can develop over time. This imbalance can eventually hurt numbers of all the various populations, both predator and prey.

#### **Proposals 39-44**

These proposals focus on the management of moose populations in the subunits of Unit 13. These proposals (39,41,42), developed by the Alaska Department of Fish and Game (Department), propose changes in the management objectives for the subunit populations and proposals (43-44) recommend reauthorizing the antlerless moose hunts. Proposal 40, submitted by the Copper Basin Fish & Game Advisory Committee also recommends changes to the management objectives for subunit 13C.

The Department provides a long series of historical data to support their recommendation for reducing the population and harvest objectives for these subunits. The MSBFWC supports these proposals primarily because these changes are based on the best available data and support the need to maintain a more sustainable population.

The proposal submitted by the Copper Basin Fish & Game Advisory Committee also addresses subunit 13C, recommending an increase in the harvest objective. However, no data is provided to support this recommendation and is not supported by the historical data presented by the Department. The MSBFWC opposes this proposal for this reason.

The reauthorization of the antlerless moose seasons as addressed in proposals 43-44 are a necessary step the department is required to follow. As stated in State regulations to conduct antlerless moose seasons, these hunts must be annually reauthorized by the local advisory committees and by the BOG. The MSBFWC should support these proposals for the reasons stated by the Department, e.g. *Unit 13 has an active intensive management program to benefit moose populations for human consumptive use. Managing a moose population for high levels of human*

*consumptive use requires harvest of cow moose to utilize additional surplus moose on the landscape and prevent moose populations from exceeding the carrying capacity of the land. To maintain moose populations within their appropriate population and sex ratio objectives while also providing adequate opportunity to meet harvest objectives, antlerless moose hunts are an essential management tool to adjust the population trajectory through additional sustainable harvest opportunities.*

#### **Proposal 49**

This proposal submitted by the Ahtna Intertribal Resource Commission (AITRC) recommends the closure of the Nelchina Caribou Herd (NCH) season for six years or until the herd reaches the midpoint of the management objective of 37,500. The management objective for this herd is 35,000 to 40,000 animals. Preliminary 2024 surveys conducted by the Department estimate the herd to be approximately 12,000 animals, well below the management objective. The Department has stated, *“That with the Nelchina caribou herd’s current low abundance, combined with low recruitment in recent years, there may be a long recovery period as the herd builds back up toward objectives. The NCH last experienced a long recovery period in the 1970s and 80s, and a similar recovery period of up to 15 years could be ahead of us. During this recovery it will be important to protect cows from harvest, as they represent the reproductive potential of the herd. This recovery period will allow forage on the range to recover if it has been negatively impacted by caribou use.”* The MSBFWC does not support this proposal as it seems unnecessary for the reason the season is currently closed; the herd is well below the management objective and if the herd does obtain the lower end of the management objective (necessary to manage a healthy herd) it is not justifiable to curtail the harvest until the mid-point of the management objective.

#### **Proposal 63**

This proposal submitted by the Department recommends that you must have a registration permit to hunt ptarmigan in Units 13B and 13E. The purpose of this proposal is to improve the collection of harvest data which is necessary to better manage this resource. This area is a very popular bird hunting area and one which experiences high hunting pressure. The current process of obtaining harvest data relies on voluntary reported harvest information which historically results in very limited data. Meaningful data is necessary to manage wildlife populations which are in very accessible areas and experience high hunting pressure. For this reason, the MSBFWC supports this proposal.

#### **Proposal 64**

The reauthorization of the antlerless moose seasons as addressed in proposal 64 is a necessary step the department is required to follow. As stated in State regulations; in order to conduct antlerless moose seasons, these hunts must be annually reauthorized by the local advisory committees and by the BOG. The MSBFWC supports this proposal. We recognize that the Sutton and Chickaloon community councils object to the harvest of cows accompanied by calves.

#### **Proposal 75**

This proposal submitted by the Department recommends adding the removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan by allowing department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and

brown bears using state-owned, privately-owned, or chartered equipment, including helicopters. When the Intensive Management Plan was developed to include the Predation Control Area (Unit 16), regulations did not allow for the department to do the removal.

This is one controversial proposal which asks the BOG to grant Fish and Game authority to do aerial predator control using state employees. The board should grant the department this authority. Using only “civilian” hunters to do this in predator control areas hasn’t really resulted in the reduction in numbers of predators needing to be removed. Giving the department this authority/ability adds another tool to the ecosystem management toolbox scenario.

Adding the ability for the department to conduct control efforts of wolves and bears ensures the department could actively manage predators in the area to aid in achieving the population and harvest objectives set by the BOG. Just because the department can do this doesn’t mean they will do this in anything other than an extreme situation.

As stated in the proposal, the department has no plans to activate bear control at this time. The wolf management objective for this area is 35-50 wolves, the current population is minimally estimated at 120 wolves. Current harvests, as allowed by existing regulations, are proving not to be sufficient to keep the number of wolves within the management objective. In addition, poor pelt quality (lice) and other harvest opportunities outside of Unit 16 have also played a role in affecting the overall harvest. The MSBFWC supports this proposal for the stated reasons.

### **Proposal 82**

This proposal was submitted by the Alaska Wildlife Alliance to establish 50-yard trapping setbacks along specific trails in Unit 14. The MSBFWC supports this proposal for the following reasons. The Matanuska Susitna Borough (MSB) is the fastest growing area in the State of Alaska. The MSB population in 2010 was estimated at 89,731 in 2022 the population has grown to 113,325 an increase of 26.3%. The continued growth of the MSB has resulted in substantial uses of the many multi-use trails. In 2017, the MSB assembly passed regulations restricting trapping on six borough-managed trails and on school grounds, but did not issue regulations for state-managed trails in deference to the regulatory powers of the Board of Game. The purpose of this proposal is to reduce potential conflicts between trapping and loose dogs, along highly developed trails in the Mat-Su Borough.

### **Summary**

The MSBFWC’s general stance on these upcoming game proposals is that if the proposal gives the department a better ability to manage the various animal species, then the commission supports the proposal. If it hurts or restricts active management, don’t pass it.

**ALASKA BOARD OF GAME**  
**Central & Southwest Region Meeting Best**  
**Best Western Lake Lucille Inn | Wasilla,**  
**Alaska**  
**January 10 – 17, 2025**

*Preliminary Actions*

C = Carry; CA = Carry as amended; F = Fail; D = Defer; T = Table; NA = No Action

**Regionwide & Multiple Units (4 proposals)**

- C** **PROPOSAL 1:** Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units.
- F** **PROPOSAL 2:** Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal
- F** **PROPOSAL 3:** Allow the use of cellular cameras for the taking black bear and brown bear over bait in Unit 9, 11, 13, 14B, 16, and 17.
- F** **PROPOSAL 4:** Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14B

*The board adopted a positive finding for customary and traditional take of black bear in Units 9A and 9B. The board deferred developing the amount reasonably necessary for subsistence for these units until the new Central & Southwest Region meeting.*

**King Salmon Area (20 proposals)**

- F** **PROPOSAL 5:** Reduce the nonresident bag limit for caribou in Unit 9D from two bull caribou to one.
- F** **PROPOSAL 6:** Shorten the nonresident hunting season for caribou in Unit 9D.
- C** **PROPOSAL 7:** Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents.
- C** **PROPOSAL 8:** Clarify that hunting feral reindeer in Unit 10, Umnak Island, is allowed under the current caribou hunting regulations. *The board adopted the option for defining reindeer on Umnak Island as deleterious exotic wildlife under 5 AAC 92.990.*
- F** **PROPOSAL 9:** Lengthen the spring and fall brown bear hunting seasons in Unit 9.

- F PROPOSAL 10:** Close Unit 9A to nonresident brown bear hunting.
- F PROPOSAL 11:** Shorten the spring and fall brown bear hunting seasons in Unit 9C by one week for residents and nonresidents.
- C PROPOSAL 12:** Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents.
- NA PROPOSAL 13:** Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, and lengthen the nonresident spring hunting season. *The board took no action due to proposal 15. The board took no action due to the action on proposal 12.*
- NA PROPOSAL 14:** Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents.
- C PROPOSAL 15:** Lengthen the nonresident, spring brown bear hunting season in Units 9D and 9E.
- NA PROPOSAL 16:** Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, *The board took no action due to the action on proposal 12.*
- F PROPOSAL 17:** Lengthen the spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents.
- NA PROPOSAL 18:** Shorten the spring and fall brown bear hunting seasons in Unit 9C for residents and nonresidents, and convert to drawing permit hunts.
- CA PROPOSAL 19:** Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10. *The board amended the proposal to set the season dates at 9/1 – 4/30, and the nonresident bag limit at 2 and no limit for residents.*
- F PROPOSAL 20:** Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10.
- C PROPOSAL 21:** Remove the two per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9.
- C PROPOSAL 22:** Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents.
- F PROPOSAL 23:** Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters.
- C PROPOSAL 24:** Close the season for Alaska hares in Units 9 and 17.

**Dillingham Area – Unit 17 (14 proposals)**

- F PROPOSAL 25:** Increase the number of moose drawing permits issued to nonresidents for Unit 17A.
- C PROPOSAL 26:** Lengthen the nonresident, fall moose hunt in Unit 17A.
- C PROPOSAL 27:** Reauthorize the antlerless moose season in Unit 17A.
- C PROPOSAL 28:** Reduce population and harvest objectives for moose in Unit 17B.
- F PROPOSAL 29:** Review the population and harvest objectives for the Mulchatna caribou herd.
- F PROPOSAL 30:** Implement a three-year moratorium on caribou hunting in Units 9, 17 and 19.
- NA PROPOSAL 31:** Close the resident caribou season in Units 9B, 17 and 19. *The board took no action because the season is already closed.*
- C PROPOSAL 32:** Allow the year-round take of brown bear in Unit 17.
- F PROPOSAL 33:** Allow same day airborne take of brown bear and wolves Unit 17.
- NA PROPOSAL 34:** Allow the same day take of brown bear in Unit 17. *The board took no action due to the action on Proposal 33.*
- CA PROPOSAL 35:** Shorten the trapping seasons for wolverine in Units 9 and 17, to the last day of February. *The board amended the proposal to exclude Unit 18.*
- F PROPOSAL 36:** Shorten the hunting season for wolverine in Unit 17.
- C PROPOSAL 37:** Remove the two per day bag limit for beaver when taken by firearm and allow the use of firearm from October 10 – May 31 in Unit 17.
- CA PROPOSAL 38:** Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting. *The board amended the dates in the proposal to September 1 – October 20.*

**Glennallen Area – Units 11 & 13 (25 proposals)**

- C PROPOSAL 39:** Reduce population and harvest objectives for moose in Unit 13B.
- C PROPOSAL 40:** Change the population objective for moose in Unit 13C.
- C PROPOSAL 41:** Reduce harvest objectives for moose in Unit 13C.
- C PROPOSAL 42:** Reduce harvest objectives for moose in Unit 13E.



- NA PROPOSAL 43:** Establish an antlerless moose season in Unit 13A. *The board took no action due to not having the required approval by the advisory committees for that unit.*
- NA PROPOSAL 44:** Establish an antlerless moose season in Unit 13C. . *The board took no action due to not having the required approval by the advisory committees for that unit.*
- F PROPOSAL 45:** Add a five-day archery only season for hunting moose in Unit 13.
- F PROPOSAL 46:** Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions.
- F PROPOSAL 47:** Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway.
- NA PROPOSAL 48:** Modify the intensive management plan for Unit 13 to include Nelchina caribou. *The board took no action on the proposal. The board requested a feasibility study from ADF&G to be presented at the Southcentral Region meeting in March 2026.*
- F PROPOSAL 58:** Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves.
- F PROPOSAL 49:** Eliminate the harvest of Nelchina caribou.
- F PROPOSAL 50:** Change the sheep draw hunt DS165 in Unit 13D to a general season hunt.
- F PROPOSAL 51:** Open a resident only sheep hunt in the Chitina River drainage in Unit 11.
- F PROPOSAL 52:** Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only.
- F PROPOSAL 53:** Establish a resident, archery only sheep drawing hunt in Unit 13D.
- C PROPOSAL 54:** Change the bag limit for the Unit 13D sheep drawing hunts, DS160 and DS260.
- F PROPOSAL 55:** Divide the goat drawing permit hunt DG720 into three separate permit hunts.
- F PROPOSAL 56:** Establish an archery only registration goat hunt in Units 13D and 11.
- C PROPOSAL 57:** Increase the bag limit for brown bear in Unit 13.
- F PROPOSAL 59:** Lengthen the wolf trapping season in Unit 11.
- F PROPOSAL 60:** Lengthen the coyote trapping season in Unit 11.
- C PROPOSAL 61:** Change the start date for the ptarmigan hunting season in Unit 13B.
- F PROPOSAL 62:** Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D.



NA **PROPOSAL 63:** Require a registration permit to hunt ptarmigan in Units 13B and 13E. *The board took no action based on the request of the sponsor to pull it.*

### **Palmer Area - Units 14A, 14B & 16 (21 proposals)**

C **PROPOSAL 64:** Reauthorize the antlerless moose draw permits in Units 14A and 14B.

F **PROPOSAL 65:** Decrease the number of antlerless moose permits for Unit 14A.

F **PROPOSAL 66:** Open a fall, archery only moose hunt in Units 14A and 14B.

F **PROPOSAL 67:** Open a fall, archery only moose hunt in Unit 16A.

F **PROPOSAL 68:** Change the bag limit of the fall, Tier II moose hunt in Unit 16B.

CA **PROPOSAL 69:** Shorten the season for the Tier II moose hunt in Unit 16B. *The board amended the proposal so the season closes on the "last day of February" and clarified implementation will be in the following year due to permits already being awarded for the upcoming hunting season.*

NA **PROPOSAL 70:** Extend the hunting season for brown bear in Units 14A and 14B. *The board took no action due to action taking on proposal 71.*

CA **PROPOSAL 71:** Extend the brown bear hunting season in Unit 14B. *The board amended the proposal to include Unit 14A.*

NA **PROPOSAL 77:** Extend the brown bear season in Unit 14B, *The board took no action due to action on proposal 71.*

F **PROPOSAL 72:** Eliminate the harvest ticket requirement for hunting black bear in Unit 16.

F **PROPOSAL 73:** Change the bag limit for sheep in Unit 14A draw hunts to any ram.

F **PROPOSAL 74:** Establish a resident, archery only, sheep drawing hunt in Unit 14A.

C **PROPOSAL 75:** Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan.

F **PROPOSAL 76:** Allow the take of brown bear in Unit 16, the same day airborne.

NA **PROPOSAL 78:** Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan. *The board took no action because the board lacks statutory authority to allow it (see AS 16.05.783).*

CA **PROPOSAL 79:** Extend the wolf trapping season in Unit 14A. *The board amended the proposal to restrict the use of traps and snares 3/32 inch diameter or smaller in October and April.*

- C **PROPOSAL 80:** Require sealing of beaver taken in Unit 16.
- F **PROPOSAL 81:** Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours.
- CA **PROPOSAL 82:** Establish 50-yard trapping setbacks along specific trails in Unit 14. *The board amended the proposal to define “enclosed”.*
- F **PROPOSAL 83:** Extend the spring hunting season for ptarmigan in Unit 16.
- F **PROPOSAL 84:** Extend the spring hunting season for ptarmigan in Units 14A and 14B.

### **Proposals Outside the Board of Game’s Authority**

*The Board of Game may discuss the following proposals but does not have authority to take regulatory action.*

- \_\_\_\_\_ **PROPOSAL 167:** For Unit 17, exempt residents who have a Tribal ID card from having a hunting or trapping license.
- \_\_\_\_\_ **PROPOSAL 168:** For Unit 17, exempt residents who have a Tribal ID card from having a hunting license for taking small game.
- \_\_\_\_\_ **PROPOSAL 171:** All domestic animals on lands designated as refuges, critical habitat areas, ranges and parks in the Central & Southwest Region, must be physically restrained by a tether.
- \_\_\_\_\_ **PROPOSAL 174:** Pause Predator Control program in Unit 17 until ADF&G can come up with a population assessment of bear density.
- \_\_\_\_\_ **PROPOSAL 184:** Establish a 4-zone management approach in Units 17A, 17B, 17C, 9B, and Unit 18.



## MATANUSKA-SUSITNA BOROUGH

### Planning and Land Use Department Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

[www.matsugov.us](http://www.matsugov.us)

January 30, 2025

Ms. Gretchen Harrington  
Assistant Regional Administrator  
Sustainable Fisheries Division  
Alaska Region, NMFS  
PO Box 21668 Juneau, Alaska 99802-1668

David Witherell  
Executive Director  
North Pacific Fishery Management Council  
1007 West 3rd Ave., Suite 400  
L92 Building, 4th floor  
Anchorage, Alaska 99501

Re: Fisheries of the Exclusive Economic Zone; Cook Inlet salmon; Harvest and Research 2025

The Matanuska Susitna Borough (MSB) Fish and Wildlife Commission (FWC) has been engaged with the NPFMC/NMFS process of management of salmon in the Cook Inlet Exclusive Economic Zone (EEZ) since 2023. In 2024, we recommended that proposed regulations reduce commercial drift gillnetting in the EEZ from two days a week to a single 12-hour period per week between July 16<sup>th</sup> and August 15<sup>th</sup>, the critical period when salmon are moving into the Northern District. In addition, that drift gear be reduced from 200 fathoms to 150 fathoms. We would like to thank NMFS for only opening the EEZ for a single 12-hour period each week between July 16<sup>th</sup> and August 1<sup>st</sup> 2024.

The FWC has reviewed the 2024 harvest results from the Alaska Department of Fish and Game (ADFG) and the National Marine Fisheries Service (NMFS). We also reviewed sections of the NMFS Stock Assessment and Fishery Evaluation (SAFE) report for the Cook Inlet Exclusive Economic Zone (EEZ) and the 2025 draft Environmental Assessment for Harvest Specifications for Cook Inlet Salmon Fisheries in the EEZ off Alaska (EA).

Of the Alternatives provided in the 2025 draft EA, the FWC prefers Alternative 1, the No Action Alternative, in which there would be no total allowable catch (TAC) set and no commercial fishing in the EEZ. However, given that this does not meet the “purpose and need”, the FWC supports Alternative 2, the status quo. We would amend Alternative 2 in the following ways:

- We encourage NMFS to only open the EEZ for a single 12-hour period between July 16<sup>th</sup> and August 15<sup>th</sup> 2025.
- We recommend that drift gillnet gear be reduced to 150 fathoms.

Additionally,

- We strongly support the reduction of Acceptable Biological Catch (ABC) for coho to 6,701 fish in 2025.



- We encourage NMFS to conduct research to fill data gaps on salmon populations and migration timing that are now part of the NMFS management mandate.
- We recommend that enforcement be expanded to ensure all fish that are harvested in the EEZ are counted.

The FWC represents the interests of the MSB in the conservation and allocation of fish, wildlife and habitat and advises borough officials, state or federal agencies and other organizations with interests that may impact conservation of fish, wildlife, and habitat. Specifically, the FWC advises MSB officials, state, or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area encompassing 25,258 square miles, an area slightly larger than West Virginia. Approximately half of Alaska’s human population resides near the shores of Upper Cook Inlet (UCI). This includes the city of Anchorage (288,121 in 2021) an additional 110,000 plus residing in the MSB. This vast region contains more than 50,000 miles of mapped streams, and supports all five species of Pacific salmon. The MSB has invested millions in fish passage improvements, reopening more than 1,000 stream miles and 6,000 acres of lake habitat for salmon rearing and spawning.

**Fishing Periods / Conservation Corridor**

Throughout the UCI, there are commercial and sport fisheries, residents use dipnets for a personal use fishery, and four indigenous communities - Tyonek, Knik, Eklutna and Chickaloon – engage in subsistence, educational, or personal use fisheries. These fisheries are already fully allocated among the many user groups, but with careful conservative management and sustainable salmon populations there can be fair opportunity for people to access fishery resources.

All salmon bound for the MSB move through Cook Inlet. The “Conservation Corridor” is a net-free area in the Inlet that opens up when drift gillnetters are not fishing, which allows fish bound for the Northern District to move through the Central District. By limiting drift gillnetting to one 12-hour opening per week during the critical period, NMFS is helping to maintain the corridor.

The Northern Cook Inlet stocks are not as productive and much smaller than the Kenai and Kasilof stocks, and in many cases are not meeting escapement objectives. Over the past several years, king and coho salmon returns have reached historic lows; 2024 was no exception.

*Actual escapement at Deshka and Little Su weirs over a generation. The generation time is considered 6 years for kings and 4 years for coho. Asterisks are shown where data is incomplete due to flooding at the weir.*

	Deshka kings	Deshka coho	Little Su coho
BEG or SEG	9,000-18,000 (BEG)	10,200-24,100 (SEG)	9,200-17,700 (SEG)
2024	3,741	642*	964*
2023	3,440	1,817*	3,439*
2022	5,440	No data	2,816
2021	18,674	No data	10,229
2020	10,638		
2019	9,705		



Extremely low levels of coho returns resulted in ADFG announcing an emergency closure of all sport coho salmon fishing in the *entire* Susitna and Little Susitna River drainages effective August 15<sup>th</sup> 2024. At the Deshka River, only 642 coho passed the weir and at the Little Susitna River, only 964 coho passed the weir, far below minimum escapement goals of 10,200 and 9,200 respectively.<sup>1</sup> Although these are incomplete escapement estimates because the weirs flooded out, the numbers are so low that it is not reasonable to expect escapement was met. These low returns reflect the situation throughout the MSB, as the Deshka is an indicator for the entire Susitna River drainage and the Little Su coho escapement has a high correlation with coho escapement throughout the Knik Arm drainage.

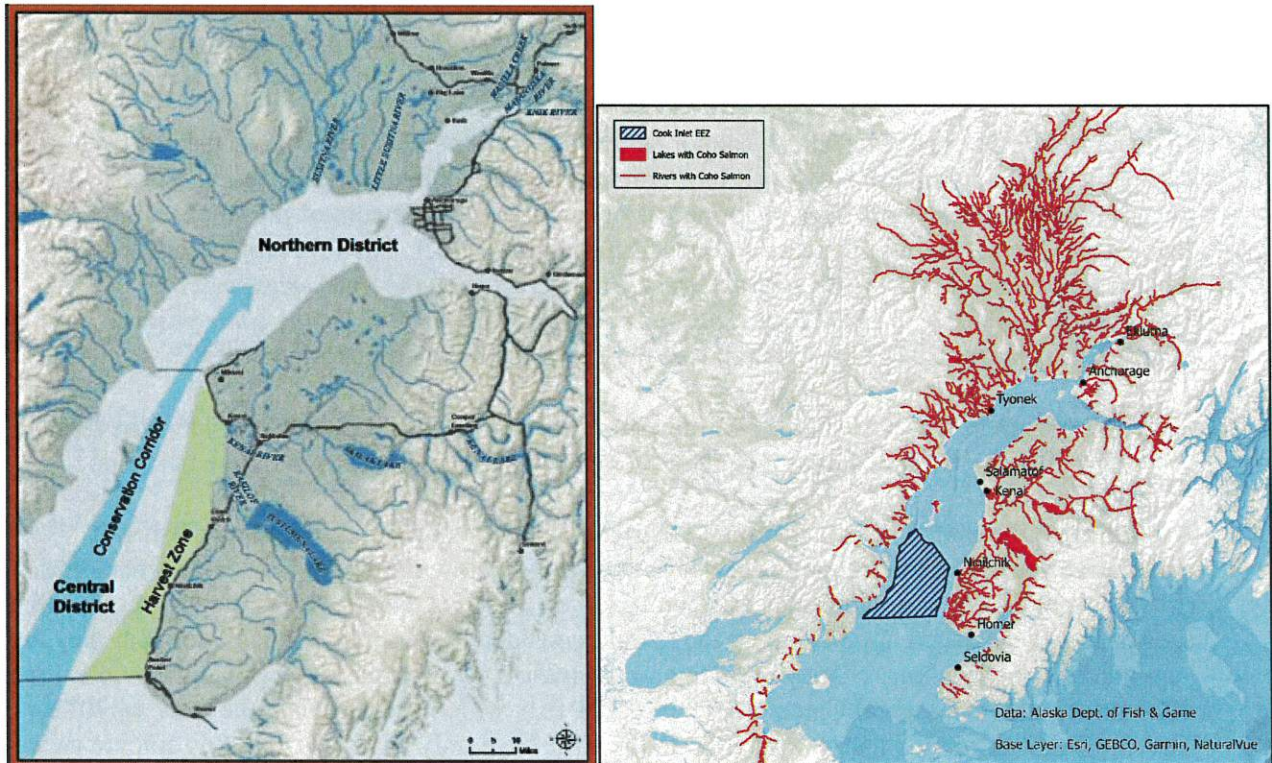


Figure 1. Left: When commercial fishing is limited to nearshore areas, a passage opens to allow salmon to migrate to the Northern District. Right: EEZ and streams that aggregate coho stocks return to.

The sustainable escapement goals (Little Su and Chuitna Rivers) and biological escapement goals (Deshka River) were not met for kings. As noted in the 2025 SAFE report 7.5.2.4, there are four Chinook Stocks of Concern in the northern part of Cook Inlet. Given recent escapement, there is an argument that all Chinook stocks in the Susitna drainage should be Stocks of Concern.

We appreciate the NMFS consideration of our comments in 2024, and their findings that *“Allowing salmon stocks of lower abundance bound for Northern Cook Inlet more opportunities to pass through the EEZ in July—particularly coho and Chinook salmon—means it is less likely the fishery will close early due to reaching the TAC for a stock of lower abundance before the drift gillnet fleet is able to harvest the TAC for abundant sockeye salmon. Additionally, spreading out the sockeye salmon harvest throughout the season by reducing fishing periods in late July will reduce pressure on Northern District sockeye salmon—which are Tier 3 stocks with less known conservation status”*



- We thank NMFS for only opening the EEZ for a single 12-hour period each week between July 16<sup>th</sup> and July 31<sup>st</sup> 2024, a critical period when salmon are moving into the Northern District. It is critical that NMFS maintain this single 12-hour opening each week and not expand commercial driftnet fishing in 2025 in the EEZ during this period.

Given the continued low escapements, particularly for coho and Chinook in 2024:

- We encourage NMFS to reduce the current two openings per week between August 1<sup>st</sup> and August 15<sup>th</sup> to a single 12-hour period each week in 2025 and all future years until escapement goals in the Susitna drainage are broadly met. This would enhance the effectiveness of a conservation corridor to allow salmon to migrate to the Northern District.

In general, Northern District stocks cannot have a determination of being “overfished” because escapement data is limited. However, they can be assessed to determine if “overfishing” occurred during the season. This is defined as occurring when the sum of the stocks EEZ harvests across a generation exceed the overfishing limit (OFL). NMFS recommends the OFL be “*the largest cumulative EEZ harvest across a generation in the timeseries under consideration and the 2025 OFL (preseason) is the average harvest for the same years...*”. This is different from the 2024 OFL, which used the “largest estimated historic harvest”.

- We support the 2025 method for determining the Tier 3 OFL<sub>pre</sub> that considers the largest average EEZ harvest over a generation rather than the highest cumulative harvests.

According to the SAFE report, Northern District coho stocks can be declared overfished if cumulative spawning escapements are determined to be below minimum stock size threshold (MSST), and overfishing would be assessed based on the OFL. NMFS states that aggregate coho are not in an overfished condition, but they could consider a future recommendation that they are “approaching overfishing”. They recommend applying a 90% buffer to the pre-season OFL for a 2025 Acceptable Biological Catch (ABC) of 6,701 fish, which is lower than the ABC of 2024. They note that estimated harvests of coho in the EEZ have only been less than this amount twice since 1999. Recognizing the very low returns of these Northern District coho stocks in recent years combined with the possibility in the future of a determination of “approaching overfishing” it seems very wise and prudent to apply the ABC at 6,701 fish.

- We appreciate and support the increased buffer and reduced ABC for coho to 6,701 fish in 2025.

### **Gear and Enforcement**

NMFS allows up to 200 fathoms of drift gear to be fished in the EEZ. By reducing this to 150 fathoms, NMFS would align with state of Alaska code (5 AAC 21.331). It also recognizes that salmon can move through an area in bursts, and would reduce the potential for exceeding a TAC in a single period.

- We recommend that drift gear in the EEZ be reduced to 150 fathoms.

We understand that NMFS inspections of vessels in the EEZ documented unrecorded fish in 2024, including kings.

- We support increased enforcement to ensure that all salmon caught in the EEZ are counted.

### Research/data gaps

Unlike Kenai and Kasilof stocks, there is no real time assessment of salmon entering the Northern District. There are weirs on a handful of rivers, but they are not always operational due to lack of funding or flooding, resulting in incomplete data. NMFS recognizes this and notes;

*“The NMFS SAFE Team recommends prioritizing future research to better characterize the abundance, timing, spatial distribution, and genetic stock composition of the coho salmon harvested in the CI EEZ fishery.”*

The purpose of the Central District Drift Gillnet Fishery Management Plan is *“to ensure adequate escapement and a harvestable surplus of salmon into the Northern District and to provide management guidelines to the (Alaska) Department (of Fish and Game). The department shall manage the commercial drift gillnet fishery to minimize the harvest of Northern District salmon and Kenai River coho salmon in order to provide all users a reasonable opportunity to harvest these salmon stocks over their entire run...”*

NOAA has a similar mandate concerning these stocks. The Magnuson-Stevens Act provides authority beyond the EEZ for all anadromous species throughout the migratory range of each such species.<sup>ii</sup> The primary research responsibility lies with NOAA Fisheries, which is required to conduct robust scientific studies to inform fishery management decisions, ensuring that all management plans are based on the best available scientific data<sup>iii</sup>... and promote sustainable fisheries **by monitoring fish populations**, identifying essential fish habitat, and assessing the impacts of fishing activities on marine ecosystems.

The ADF&G in the past annually operated an offshore test fishery (OTF) near the southern boundary of the Upper Cook Inlet (UCI). The purpose of this test fishery was to estimate the sockeye salmon run returning to UCI. In 2012, an additional OTF was implemented to examine the spatial and temporal distributions of various sockeye and coho salmon stocks to identify migration routes and run timings of Susitna and other UCI salmon stocks. Neither of these important test fisheries are in operation today.



In our letters to the NPFMC/NMFS in 2024, we outlined the need for additional data to support NMFS management of Northern District stocks that cannot have escapement enumerated in real-time. Specifically, in order to establish a reliable TAC based on the proportional contribution of each stock to this fishery, better data must first be established:

- Test fisheries need to be reinstated to help determine return abundance and take place where Northern bound fish are most easily differentiated from Kenai bound fish.
- In-season genetic data and more robust escapement data is needed for salmon stocks of Northern Cook Inlet.

### SUMMARY

In summary, we advocate for a single 12-hour opener per week during the critical July 16<sup>th</sup>- August 15<sup>th</sup> period in 2025; we support the new buffer for the 2025 coho ABC; we strongly advocate for NMFS to conduct research, including test fisheries and genetic studies to fill data gaps on abundance and run strengths of salmon bound for Northern District rivers; we recommend increased enforcement efforts; we request that NMFS reduce drift gear lengths from 200 fathoms to 150 fathoms; ; and we support the method for determining the OFL.

Sincerely,



Andy Couch  
Chair, Matanuska-Susitna Borough Fish & Wildlife Commission

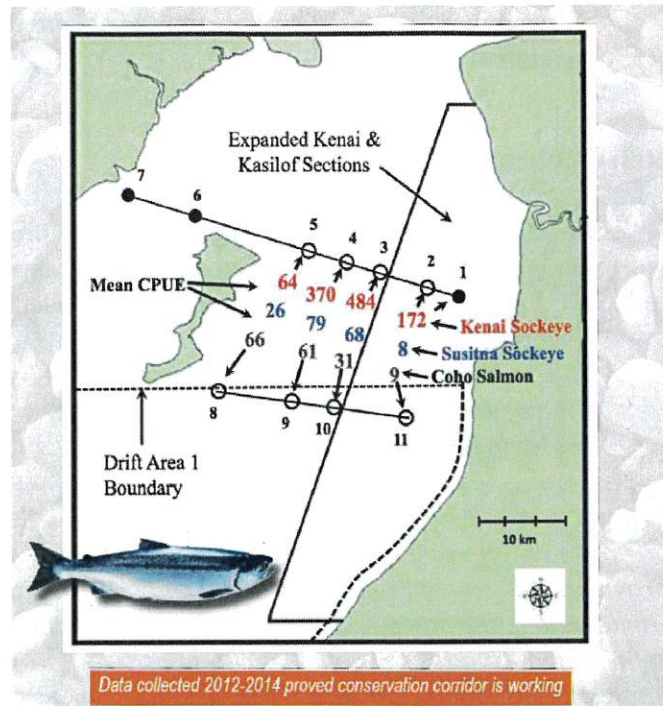


Figure 2. Results of offshore test fisheries conducted by ADFG.

<sup>i</sup> ADFG 2024 Upper Cook Inlet Commercial Salmon Fishery Season Summary, released Nov 13 2024

<sup>ii</sup> [https://www.st.nmfs.noaa.gov/st1/fus/fus08/11\\_general2008.pdf](https://www.st.nmfs.noaa.gov/st1/fus/fus08/11_general2008.pdf)

<sup>iii</sup> <https://www.fisheries.noaa.gov/topic/laws-policies>

Cc's

Edna Devries, Mayor Matanuska-Susitna Borough  
State of Alaska Doug Vincent-Lang, Commissioner, State of Alaska  
Matanuska-Susitna Borough Assembly and Manager