



VIA EMAIL & U.S. MAIL

(eric.volk@alaska.gov, bob.clark@alaska.gov,
adfg.chinookanalysis.comments@alaska.gov)

November 9, 2012

Eric C. Volk & Robert A. Clark
Divisions of Commercial & Sport Fish
Alaska Department of Fish & Game
333 Raspberry Road
Juneau, AK 99518-1599

Re: 2012 Alaska Chinook Salmon Symposium & Gap Assessment

Dear Mr. Volk & Mr. Clark:

Thank you for the opportunity to comment on the management and fate of our public fisheries. These comments supplement additional comments submitted recently by Inletkeeper's Science Director.

Cook Inletkeeper appreciates the State's efforts to respond to Chinook salmon concerns in Cook Inlet and elsewhere. But ADFG's recent Chinook Salmon Symposium/GAP Analysis largely fails to address the loss and degradation of fresh water habitat as a factor in wild Alaska salmon run strength, productivity and overall population health. It also fails to address ADFG's inability or unwillingness to enforce laws designed to protect salmon habitat. These are two things are under direct state and local control, and if we address them as we can and should, our salmon have a much stronger chance of enduring.

It's clearly important and necessary to confront our "black box" understanding of salmon in the ocean, where we have little or no idea what truly affects salmon fitness or survivorship. By-catch, climate change and ocean acidification are but a few of the more pressing issues needing more research and management attention. But the ocean is only part of the equation. We know the loss and degradation of freshwater salmon habitat will directly impact wild salmon productivity and sustainability. We need look no further than the well-documented loss of once-great salmon runs around the world to understand the role habitat loss played in the demise of those runs.

Too many salmon runs have succumbed to the "death by a thousand cuts," where a lack of planning and piecemeal development – combined with the active or passive refusal by responsible agencies to

enforce the laws - have fragmented the unique and diverse habitats needed to sustain them. Now, Cook Inlet salmon runs are staring down the barrel of the same fate:

- ADFG issued illegal permits this August to allow Hilcorp to mine boulders and fill a salmon stream in the Redoubt Bay Critical Habitat Area, so industry could resume oil storage at the base of an active volcano.
- ADFG has refused to act on gravel pit pollution dumping directly into King salmon habitat on Two Moose Creek, a tributary of the Anchor River on the Kenai Peninsula. Inletkeeper has provided ADFG with pictures, water quality data and other evidence to show ongoing violations, to no avail.
- ADFG continues moving forward with the proposed Chuitna coal strip mine, which will set a dangerous precedent by removing 11 miles of salmon streams and irreversibly polluting the Chuitna River, known as the “Kenai of the West Side” and renowned for its King salmon runs.
- The Alaska Department of Environmental Conservation has made it a priority to authorize pollution “mixing zones” in salmon habitat; mixing zones embrace the long-discounted notion that dilution is the solution to pollution, and they have been rightly banned in Alaskan salmon habitat for years.
- The ADFG refuses to give Alaskans public notice and the opportunity to comment on “Title 16” permits, which authorize in-stream impacts to salmon habitat.
- The ADFG rubber-stamped the ill-conceived 35 mile railroad connection to Port Mackenzie, which will dam surface and groundwater flows in salmon streams in the Mat Su Valley, where fishing closures and restrictions are increasingly the norm.
- The Alaska Division of Natural Resources (DNR) recently proposed new, extensive coal leases adjacent to the Little Susitna River, in a move that will fragment and pollute important Cook Inlet salmon habitat for all users downstream.

Donald Rumsfeld is not a fisheries biologist. But he spoke these famous words as if he were:

“There are known knowns. These are things we know that we know. There are known unknowns. That is to say, there are things that we know we don't know. But there are also unknown unknowns. There are things we don't know we don't know.”

In the case of Chinook and other wild Pacific salmon:

- We know salmon need freshwater habitat and intact landscapes to survive;
- We also know we don't know enough about freshwater systems;
- And we know we don't know much of anything about salmon in the ocean.

If the ocean is the “black box” fisheries managers struggle to understand, it is imperative ADFG do everything possible to protect the resources and values we do understand and where we do have controls – i.e. the freshwater habitat salmon need to live and breed. Furthermore, the State of Alaska must enforce existing water quality and habitat protection laws and rules, provide Alaskans meaningful opportunities to engage on projects that will harm salmon habitat, and prioritize the protection of

intact salmon streams and riparian areas to avoid habitat fragmentation. These basic protections become all the more important as temperatures continue to increase, making wild salmon more vulnerable to pollution, predation and disease.

Alaskans across the spectrum broadly support wild salmon habitat protection. That's why over 6000 thousand Alaskans have signed a petition to protect wild Alaska salmon habitat¹. If the State of Alaska and our fisheries managers continue to ignore common sense safeguards, Alaska will surely follow Europe, New England and the Pacific Northwest in watching our salmon disappear.

We cannot state more emphatically the need for the State of Alaska to take a more active and engaged role protecting our wild salmon habitat through additional research and management efforts.

Very truly yours,



Bob Shavelson
Director of Advocacy & Inletkeeper

cc: (VIA EMAIL ONLY)

Cora Campbell, Commissioner, ADFG

Randy Bates, Habitat Director, ADFG

Larry Hartig, Commissioner, ADEC

Dennis McLerran, EPA Region 10 Administrator

Dianne Soderlund, EPA Alaska Operations Director

Geoffrey Haskett, Regional Director, USFWS

Doug McBride, Acting Branch Chief-Fisheries, USFWS

Samuel D Rauch III, Acting Assistant Administrator for Fisheries, NOAA

James Balsiger, Alaska Region Administrator, NMFS

Doug Mecum, Regional Administrator, NMFS

Doug Limpinsel, Habitat Conservation Division, NMFS

Mike Navarre, Mayor, Kenai Peninsula Borough

Ricky Gease, Kenai River Sportfishing Association

Roland Maw, United Cook Inlet Drift Association

Paul Shadura, Kenai Peninsula Fisherman's Association

Buck Laukitis, North Pacific Fisherman's Association

Mark Vinsel, United Fishermen of Alaska

¹ See the petition at: <http://bit.ly/SalmonPetition1>